

PROPOSED WALVIS BAY WATERFRONT DEVELOPMENT, NAMIBIA

ENVIRONMENTAL IMPACT ASSESSMENT (EIA) - JUNE 2017

CLIENT: WALVIS BAY WATERFRONT DEVELOPMENT PTY LTD

BACKGROUND INFORMATION DOCUMENT



PURPOSE OF THIS DOCUMENT

The purpose of this Background Information Document (BID) is to provide interested and affected parties (I&APS) with a background to the proposed Walvis Bay Waterfront and invite I&APS to register in the Environmental Impact Assessment (EIA) process. Through registering, the I&APS will be kept informed throughout the EIA and a pathway provided to submit comments pertaining to the project.

This BID includes the following:

- Introduction
- How the EIA process works
- Public participation process and how to become involved
- What is proposed and where
- Why the project is needed and what benefits or impacts are anticipated
- Alternatives being considered
- Next steps and way forward

Project Introduction

Environmental Compliance Consultancy [ECC] has been engaged by Walvis Bay Waterfront Development Pty Ltd to undertake the Environmental Impact Assessment (EIA) for the proposed Walvis Bay Waterfront development.

Walvis Bay Waterfront Development Pty Ltd intends to develop land portions 4941 and 4939 in accordance with the councils Integrated Urban Strategic Development Framework (IUSDF). The project includes developing a marina for the proposed Waterfront.

The proposed plans incorporate residential, public open space, retail and various other activities in a waterfront development in Walvis Bay, Namibia.

The proposed project triggers listed activities in accordance with the Environmental Management Act 2007. An application for Environmental Clearance will be submitted in the form of an Environmental Impact Assessment to the relevant competent authorities and Ministry of Environment and Tourism in accordance with the Act.



Proposed Waterfront Concept Images

Project Introduction - Continued

The land site is currently zoned as Private Open Space. The site is characterized by public open space with municipal facilities including swimming pool, cricket field, tennis and jukskei courts.

The proposed site faces the Walvis Bay Lagoon, a RAMSAR listed wetland with the marina portion of the project located near the Raft restaurant on the edge of the mouth of the Walvis Bay lagoon. The proposed land site is heavily disturbed by urban development while the marina portion extends between 30-50m into the lagoon to connect with the Raft restaurant.

The development is not large, relative to other on-going construction in the Walvis Bay environs, but it may impact on the mouth leading into the lagoon. The area being considered for development is neither pristine nor undeveloped. Although the Walvis Bay lagoon and wetlands have been declared a RAMSAR site and area of global environmental significance, there are numerous commercial enterprises in and around the wetlands, including saltpans and a salt works, an upmarket hotel at Pelican Point near the entrance to the lagoon.

Namibia became a signatory to the Ramsar Convention in 1995 and has registered 4 sites of International Importance: Walvis Bay; Sandwich Harbour; Etosha Pan and the Cuvelai Drainage; and the Orange River mouth (jointly with South Africa). The mission of the Ramsar Convention is "the conservation and wise use of all wetlands through local and national actions and international cooperation, as a contribution towards achieving sustainable development throughout the world".

The area holds significant social importance to members of the Walvis Bay community. The area is used by a broad spectrum of community members and associations for sporting and recreational activities. The proposed project will include the relocation of such facilities and will disturb the existing social elements associated with these facilities while the facilities are relocated. The developer in conjunction with the municipality and the community expectations will relocate the sporting facilities offering a new and generally higher standard of facility than currently exists.

Need for the Walvis Bay Waterfront

Walvis Bay is Namibia's largest harbour and port with passenger amenities, cargo loading quays, storage and transport services, dry-dock facilities, and commercial fish processing factories. The lagoon is used for commercial mariculture farms and also for tourism and recreational activities such as wind- and kite-surfing and kayaking. Marine tours take visitors into the lagoon and out to Pelican Point to view seals and dolphins close up. Recreational fishing spots are found on the sandspit at the seaward end of the wetlands, within the lagoon and around the northern shores of the bay.

The wetlands are popular with birdwatchers, as they host vast populations of resident and migratory birds of a variety of species. The esplanade along the eastern shore of the lagoon affords visitors and locals the opportunity to view flamingos, pelicans, waders and other coastal birds from close range.

The proposed Walvis Bay Waterfront will bring a new and improved dimension to Walvis Bay offering a secure and safe place of anchorage for small recreational and commercial boats/yachts. The waterfront will bring social cohesions offering access to the marine waterfront, new opportunities for existing and new businesses with increased patronage to the area. The waterfront will lend itself to free flowing pedestrian access linking into existing walkways to allow tourists and pedestrian access to flow freely. The Waterfront will become a place for local residents and tourist alike to enjoy, offering restaurants, shopping, retail, housing and offices to the Walvis Bay community. With such a development there will be economic benefits and up-liftment of the area for the town, jobs will be created through construction and long term through retail and business that will operate from the Waterfront.

Applicant – Walvis Bay Waterfront Development Pty Ltd

Environmental Assessment Practitioner – Environmental Compliance Consultancy (ECC)

Competent Authority – Ministry of Environment and Tourism (MET)



What is Proposed?

The proposed Waterfront development will include several types of infrastructure and land use within the proposed site. Preliminary designs for the proposed development include the following:

- Medium Density residential areas
- High Density residential areas
- Public Open Space
- Business Offices
- Hotel
- Service Yard and Parking Areas
- Conference Centre
- Internal Access Roads
- Marina
- Restaurants

The above-proposed activities are illustrated in the preliminary design for the development.



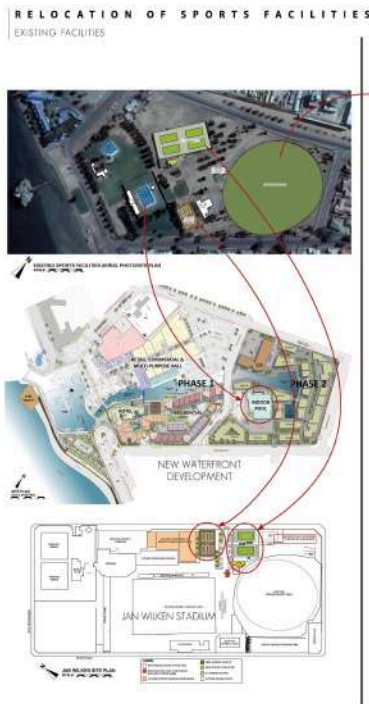
Site location

The site is located in the Walvis Bay Municipality of the Erongo Region, Namibia. The proposed Waterfront is situated on the land portions 4941 and 4939. The site has the following Municipal facilities that will be relocated as part of the project:

- Swimming Pool and ablution/supporting services
- Tennis Courts
- and -small clubhouse
- Cricket clubhouse (phase 1)
- Cricket field (phase 2)
- Jukskei courts

The project will be completed in two phases:

- Phase 1A &1B – 3.4ha
- Phase 2 – 2.5ha



The City Council is investigating and trying their best to find an appropriate site for the cricket field accompanied by practice nets and a clubhouse. Two sites have been considered by the Municipality/Town Council:

- One next to bridge as you come into town from Swakopmund on the right hand side. (Not approved as that area is to be used for housing rather.)
- A site @ the Nuusboom stadium, where there are currently 2 soccer fields. (Not approved as the community is fully utilizing the soccer fields both for practice and also as for parking area for big events at the stadium.)

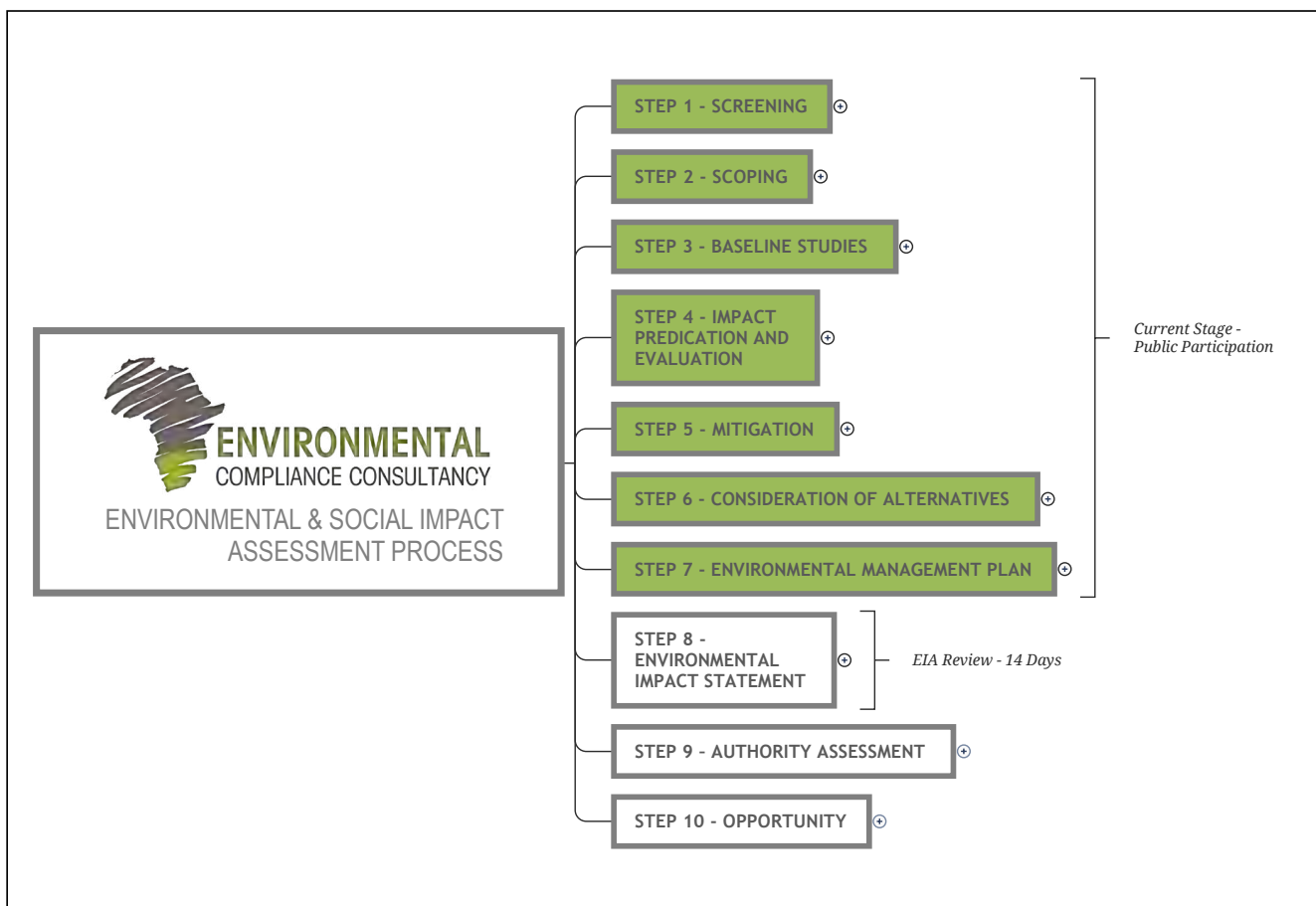


THE EIA PROCESS

The Environmental Impact Assessment process followed is in accordance with Environmental Management Act 2007. The environmental practitioner is required to conduct the environmental application process and manage the public participation process. According to the EIA process flowchart below, this project is currently at the Scoping phase and the public participation process is being conducted. ECC will perform the following:

- Identify key stakeholders, authorities and municipalities, environmental groups and interested or affected members of the public, hereafter referred to as IAPs.
- Give written notice to the owners and occupiers of land adjacent to the site
- Compile a Background Information Document (BID) for the proposed development,
- Advertise the environmental application in two newspapers, namely: 'The Namibian' and 'The Informate' in addition ECC has advertised in the Namib Times;
- Place on-site notices at conspicuous places at/ near the proposed development boundary;
- Obtain landowner's consent, where required (in this instance the applicant is the landowner);
- Host a Public meeting to encourage stakeholder participation and engagement, and provide details of issues identified by the EAP, stakeholders and IAPs;
- Record all comments of IAPs and present such comments, as well as responses provided by ECC, in a full Comments and Responses Report, which will be included in the Scoping Report that is submitted to MET;
- Circulate all IAP comments to the project team;

The commenting period for all IAPs will be 14 days from notification. The Draft Scoping Report (DSR) will be made available to all relevant stakeholders and IAPs for further comment, before the final scoping is submitted to MET and the Competent Authority. The following process flowchart illustrates the environmental process to be followed during the EIA for the proposed project.



Scope of Work

The scope of work for the EIA is based on the scope of work provided by the MET and includes but not limited to assessment of:

- Impacts of construction of channel and other structures below the high water mark on the water quality of the lagoon;
- Risks of Marine pollution from boats
- Impacts of boats navigation to and from the proposed Marinas, taking into consideration of tidal variations in the lagoon;
- A hydrodynamic modelling study needs to be completed for the channel and structures to see how these may affect the circulation in the lagoon and then assess the potential associated impacts
- Appropriate maintenance plan for channel (dredging) and its impacts
- Strategies for waste management
- Impact of lights on the birds in the lagoon and alternatives
- Any other impacts that may be found to be associated with the proposed project

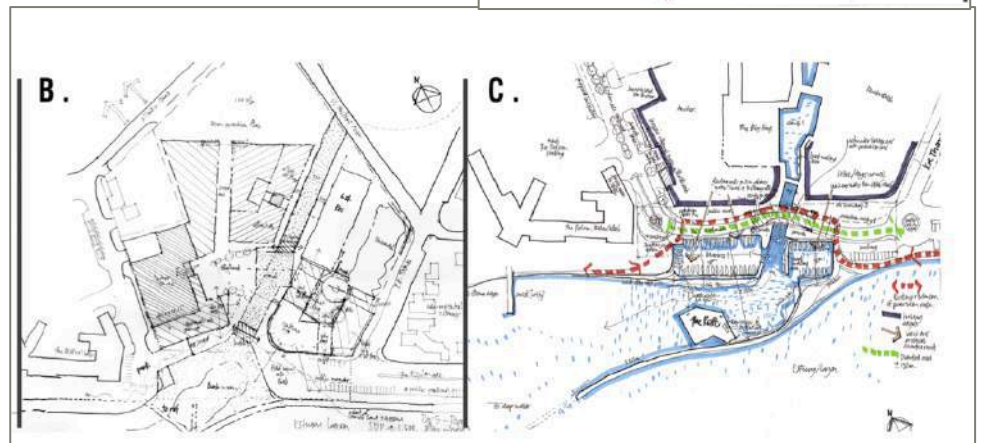


What alternatives are being considered?

Many alternatives are being considered for the project these include:

- Design alternatives for example breakwater wall design
- Marina design and position to prevent sedimentation
- Building design and positioning
- Sporting facilities relocation and options
- Traffic routing and alternatives

One key component for consideration in the undertaking of this environmental impact assessment is the process of conducting a project alternatives assessment. The alternative assessment will look at options in project siting, technologies and land uses and will be included in the EIA.



Design Development - Sketch Plans



Design Development -Stage 05



Design Development -Stage 08



Moving Forward...

Public Participation

HOW TO GET INVOLVED?

Public participation is an important part of the EIA process, as it allows public to obtain information about the proposed project.

Public participation occurs at various stages throughout a project lifecycle including:

- Advertising in newspapers
- Distributing this BID to identified stakeholders
- Providing access to draft scoping reports
- Registered I&APS will also be informed of the availability of the draft scoping report for a 14 day comment period, during which the period the public will have the opportunity to review the draft document and raise any issues of concerns
- Advertising the decision received from MET and affording an opportunity to I&APS to appeal the decision

At ECC we make sure all information is easily accessible to the public, follow our social media pages to be kept up to date.



https://www.facebook.com/environmentalECC/?ref=br_rs



<https://twitter.com/ECCEnvironment>



<http://eccenvironmental.com/projects/>



**+264 81 262 7872 OR
+264 81 653 1214**

I&APS Next Steps

1. Register as I&AP on our website.
 - <http://eccenvironmental.com/projects/>
2. Follow ECC on Facebook and social media to keep up to date
3. Comments must be submitted in writing and can be emailed to the following address:
 - info@eccenvironmental.com
 - Tel: +264 81 626 7278
 - Please note the EIA review period will be 14 days from the date that I&AP have been notified.

Contact Us:

Environmental Compliance Consultancy Contact Details

We welcome any enquiries regarding this document and its content, please contact:

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Appendix D – Stakeholder Engagement

Walvis Bay Waterfront Pty Ltd

PREPARED FOR



MARCH 2018

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1. NEWSPAPER ADVERTS

THE NAMIBIAN

mOshiwambo

FRIDAY 2 JUNE 2017 31



OKWAANA ELAGO ... Oholongo yimwe oya si sho ya purmwa kohautu mondjila yopokati kaGobabis noshilandopangelo shaNamibia mEtiyali lyoshiwike shika. Ayehe mboka ya li mahouto oye ehamekwa ashike kashona.

Ethano: Garwin Beukes

Aakongo taa gandja uumbangi moshipotha shedhipago lyamukwawo

EPULAKENO lyihokololoyoshi-
potha shomuna-
faalama gwomomudhi-
ngoko gwaKahandja,
ngoka ta fekelelwa
edhipago lyomukongo
muJanuali omumwo gwa
yi, okwa tegelelwa li
ka tsikile mopangungu
yopashitopolwa moshil-
landopangelo Iwanima
omwedhi nguka, konima
yiwike itatu.



Kai Rust

Konima shoo oom-
bangi dhotang dhepan-
gelo ndatu dha gandja
uumbangi, oshipotha shomunamimvo 45
Kai Rust osha li shu undulilwa komasiku
22 Juni uunambo.

Ihokolola oya tamekele mEtiyali ly-
oshiwike shika.

Pethimbo lyihokolola, Rust okwa tindi
ondjo moshipotha shedhipago nosho wo
miipotha itatu yonkambadhala yedhipago.

Rust ota fekelelwa edhipago lyomu-
namimvo 41 Andreas Ukandanga ko-
faalama yedhina Otukaru, ofaalama yaha
yaRust, momasiku 27 Januari 2016.

Ukandanga okwa si kiilalo yoholo.
Epangelo otali nyenyeta kutya Rust
okwa li wo ta kambadhala okudhipaga
aakongo pamwe naUkandanga ye li ya-
tatu, sho e yu umbu pethimbo lyedhipago
lyaUkandanga.

Aalumentu yatatu mboka ya li naU-
kandanga sho a dhipagwa oyo oombangi
dhotang dhepan-gelo dha gandja uum-
bangi, dhe shi ningi mEtiyali nomEtitatu
lyoshiwike shika.

Oya hokololothwa komutokolihapu
Alexis Diegaard.

Oya tseyithile ompangu kutya yo naU-
kandanga oya yile mofaalama Otukaru, yi
li mUmbangalantu-zilo wOkahandja, oyo
ya ka konge iyamakuti, esiku Ukandanga
a yahwa.

Oya li yi ipyakidhila taa yuyu oholongo
shoo yu uvu omotopelo gwondjembo e taa
mono Ukandanga ti ihata po noya fadhuka
po, oombangi tadi hokolola.

Manga ya li taa ga tanga ya thinda
komamwenyo, Ndara Ndjamba, Nikanor
Njamba naMuronga Hausiku oya ti Rust
okwe yu umbu.

Ehokololo kutya Rust okwe yu umbu
manga ya li taa li ongaku, nando ongaku,
ina li gandja petameko sho ya hokololele
opolisi konima yoshiningwanima, ihe
olya holoka ashike momahokololo ngoka
ya gandja kopolisi konima yoomwedhi,
hahende gwaRust, omunongoveta Jan
Wessels taseyithile oombangi dhikandatu.

Omunongolaamata Wessels okwa tum-
bula wo kutya omutanenki ngoka a li a
kalela po epangelo, okwa fundja ompangu
pethimbo lyepulakeno lyeyindilo lyom-

booloha yaRust mop-
pangungu yamangestrata
mOkahandja muFebulu-
ali omumwo gwayi, sho
li lombwele Rust kutya
okuna omahokololo e ga
peva kumboka ye mu
mona, taa ti okwe yu
umbu manga taa tanga
omakwanambiyu taa
thigi po ehala mpoka
pwa dhipagelwa Ukan-
danga.

Mbyoka iifundja,
molwashoka ehokololo
lyaaokongo kutya Rust
okwe yu umbu, oga
kuthwa konima yepulakeno lyeyindilo
lyombooloha, Wessels ta ti.

Wessels okwa gwedha po wo kutya omu-
tamaneki okwa fundja sho a li a lombwele
Rust kutya sho a yaha Ukandanga, okwe
mu tsikinika.

Omunongolaamata Wessels okwa
gwedha po wo kutya olopota ontiyali
yomakonako gomudhimba gwaUkan-
danga oya manithwa konima yoomwedhi
omulongo konima sho olopota yotango ya
gandjwa nale.

Nando osha li sha yelithwa molopota
ontiyali kutya Ukandanga okwa yaha
mothingokombinga yokolumoho, olopota
yotango otayi holola kutya okwa yaha
mepepe yokolumoho, mwa monika iilalo
itatu, shoka tashi tsu kumwe nehokololo
kunya Ukandanga okwa yakwa koshikuti
shi idhenga tango musha manga inashi mu
yaha, Wessels ta ti.

Kombinga yoshipotha shedhipago,
shoka Rust i ikala mEtiyali lyoshiwike
shika, epangelo otali ti Rust okwa dhipaga
Ukandanga sho e mu yaha mothingo.

Rust petameko okwa li a hokolola ku-
tya, esiku lyoshiningwanima, okwa adha
ombwa mofaalama yaha e tu umbu hoka
ya gama, Wessels ta lombwele ompangu.

Ombwa oya li ya thikama komeho
gemanya enene, nopahokololo IyaRust,
okwa mono aalumentu yatatu ya hwatuka
konima yemanya e taa fadhuka po konima
shoo u umbu oshikuti shotango.

Opo the oku umbu ishewe iikuti itatu
mombepo, nolwahugunina okwa shoneke
ombwa e te yi yaha, Wessels ta hokolola.

Rust okwa li inu umbu omuntu nela-
lakano lyoku mu yaha, oku mu ehameka
nenge oku mu dhipaga, Wessels ta hoko-
lolele ompangu.

Kapu na omalimbililo kutya Ukandanga
okwa yakwa koshikuti sha nuka kusha
shilwe shi ili, Wessels ta ti.

Rust okwa kala e edhililwa mondho-
longo okuza esiku a mangwa po, momasiku
27 Januari omumwo gwa yi.

Pethimbo lyihokolola oshiwike shika,
epangelo olya li lya kalelwa po komuta-
maneki Filemon Nyau.

NOTICE OF ENVIRONMENTAL ASSESSMENT AND PUBLIC PARTICIPATION PROCESS

PROPOSED WALVIS BAY WATERFRONT AND MARINA, NAMIBIA

Applicant: WALVIS BAY WATERFRONT PROPERTIES (PTY) LTD

Project: Walvis Bay Waterfront Development and Marina

Proposed Activity: WALVIS BAY WATERFRONT PROPERTIES (PTY) LTD propose to develop land portions 4941 and 4939 current private open space to business space for the proposed Walvis Bay Waterfront. The project includes developing a marina for the proposed Waterfront.

Location: Walvis Bay, Erongo region, Namibia



Application for Environmental Clearance Certificate: In terms of the Environmental Management Act (No 7 of 2007), WALVIS BAY WATERFRONT PROPERTIES (PTY) LTD is required to submit an application for Environmental Clearance to the Environmental Commissioner of the Ministry of Environment and Tourism for the above-mentioned project. The above-mentioned EIA is being conducted by Environmental Compliance Consultancy (ECC).

Review and Comment Period: The purpose of the comment period is to present the proposed project and to afford interested and affected parties (I&AP) an opportunity to comment on the project to ensure that all issues and concerns are captured and considered in the assessment.

A public meeting will be held on the 12th June 2017 at the Walvis Bay Town Hall from 5pm until 7pm.

Public Participation Process: Environmental Compliance Consultancy is undertaking the required environmental assessment and public participation process in accordance with the Act. I&APs and Stakeholders are required to register for the project at: <http://eccenvironmental.com/projects/>

Please note that only registered I&APs will be included in future correspondence regarding this process.

Social media platforms are available to keep up to date with the project, please follow these pages to be kept informed regularly:

<https://www.facebook.com/WalvisBayWaterfront/>
<https://www.facebook.com/environmentalECC/>

Alternatively please submit your name, contact information and interest in the project, in writing to Environmental

Compliance Consultancy: Mr JS Beuzendhouet or Ms J Mooney

Environmental Compliance Consultancy (ECC)

Registration Number CC/2013/11404

P. O. Box 91193, Klein Windhoek

Tel: +264 81 262 7872 or +264 81 653 1214

E-mail: info@eccenvironmental.com

Website: www.eccenvironmental.com





Photo: EPA

GROWING DEMAND ... Protests over housing at an informal settlement near Johannesburg. There has been surprisingly little innovation in the field of housing. Now, more than ever, new approaches are needed.

South Africa Urgently Needs To Rethink Its Approach To Housing

• AMIRA OSMAN

Recent protests over housing shortages in Gauteng, South Africa's richest province and economic hub, have put the spotlight on the problem and the role of government in providing it.

Housing is a contentious political issue in the country. Strict social engineering during apartheid meant that black people were disadvantaged. Cities were racially divided, and the black population forced to live far from places of economic activity and without public amenities.

When it came into power in 1994, the new government tried to address these issues through various strategies, initially focusing on building houses, then attempting to shift the focus from "housing" to "human settlements". A new plan was announced in 2004, designed to address problems arising from the policies of the first 10 years of democracy.

But problems have persisted, leading to protests across the country. This article focuses on Gauteng where the housing backlog is big and tensions have been running high.

Ability To Deliver

Gauteng has a backlog of a million houses. The problem has been exacerbated by budget cuts. In addition, it is said that more than 100 000 people move to Johannesburg a year, making it impossible to address the scale of demand.

Recent events seem to imply that the government may be resorting to short-term measures to pacify anger and protest. But a major overhaul of housing policy is what's actually needed.

Pinning down the exact size of the housing backlog is difficult. What's clear is that the government's ability to deliver has declined. Protesters point out that they have been on housing waiting lists for many years. Extreme frustration has given rise to violent protests which have been growing in intensity.

People are unhappy with unclear time frames about when developments will take place. Tired of empty promises, they now want "time lines and commitments".

The Gauteng government initially responded by outlining the projects it was planning. But these longer term visions are starting to give way to unrealistic promises being made at community meetings. These include plans to initiate land distribution and housing projects as soon as next month.

The danger is that government runs the risk of deviating from designing innovative, lasting solutions. Despite claiming that it's committed to changing the way in which it manages demand; the more vocal residents are, the more the pressure piles up to continue providing houses in the same way.

This further delays the need to shift its focus from greenfields, peripheral locations to 'corridors' that connect different parts of the disjointed city.

Successes And Failures

South Africa's post-apartheid constitution emphasised the right of everyone to adequate housing. This has been reaffirmed in subsequent Constitutional Court judgements, such as the celebrated Grootboom Case of 2000.

The housing programme is based on the Reconstruction and Development Programme of 1994. 'RDP' houses became a colloquial term for free houses provided by the government under a

subsidy programme.

South Africa's mass housing programme has been hugely successful in terms of the number of houses built: nearly four million 'housing opportunities' – serviced stands, houses or social housing units – have been built since democracy in 1994.

Yet the supply of houses has not been able to keep up with the increase in demand in urban areas.

And the government's approach has given rise to rows upon rows of 'one-size-fits all' houses located at the periphery of cities, far from work opportunities and services, reinforcing apartheid's spatial patterns.

While it's acknowledged that the country must think beyond free houses, and that sustainable human settlements must include socio-cultural amenities and jobs, not much has been done to make this a reality.

Government is fully aware of this challenge. According to Paul Mashatile, the minister in charge of housing for Gauteng: "RDP houses used to be built far away from anything. Today we are bringing RDP, bonded houses and rental stock together. We want poor people to live in the same space as everyone else."

In a bid to achieve this objective, and to increase the supply of houses, two years ago the government announced a programme to deliver mega housing projects. These and other government plans will, over the next few years, see people being housed in new developments.

But corridor developments and mega projects bring new layers of complexity. Can these be managed? Can demand be addressed and anger reduced? Can this be done fast enough?

Time For Change

Models of delivery can't continue to depend on the government. Instead, it should see its role as facilitating a diverse and multifaceted approach to ensure the involvement of many role players. This would result in different types of housing products and housing delivery methods that are less reliant on subsidies.

There are potential solutions that the government could pursue. These include:

- Rethinking government's role as the sole funder. Diverse funding streams and the involvement of a range of stakeholders would allow for low cost and affordable housing to be an integral part of all city developments in well located, mixed income, mixed function, mixed community settings.

- There should be a shift away from ownership and more focus on rental options. Private developers must be supported to operate in the field.

- Delivery needs to be quick and efficient with minimal bureaucracy and delay, and must acknowledge the social as well as the technical aspects of housing.

- Policymakers must revisit the questions of who should be targeted, what housing products should be delivered and how they should be delivered. For example, there needs to be a shift away from individual subsidies and products to collective models of housing.

There has been surprisingly little innovation in the field of housing. It's time for that to change, before it's too late.

– This article was originally published on *The Conversation*. You can read it at theconversation.com

– Amira Osman, associate professor in architecture, University of Johannesburg.

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E-mail: info@eccenvironmental.com
Website: www.eccenvironmental.com



08 June - 14 June 2017

Informanté

COASTAL 11

Hearts and hands open for shack dwellers

COMMUNITY AIDS SHACK FIRE VICTIMS

The scourge of shack fires has brought the community of Walvis Bay closer together in a gesture to help those who have suffered the most.

Niel Terblanche

Two incidents of fires raging through shacks in the informal settlements of Walvis Bay in as many weeks have left yet another group of families without a roof over their heads.

In the first incident, about 15 shacks burned to the ground when a fire started in the informal settlement of Tutenani and in a second incident a few days later, 17 more shacks were destroyed as people looked on helplessly.

Businesses and other organisations came together and donated money, blankets and other essential items to the Mayoral Fund of Walvis Bay to help where they can. The recent Winter Knights drive from the Round Table also garnered some donations towards the fund which would distribute the items to families left destitute by fires.

The Round Table has donated household items worth more than NS30 000 to the fund. During the latest round of donations, Paulus Ndume of Ndume Trading in Walvis Bay, donated an amount of NS50 000 towards the fund.

Namsov, Fishmar and OK Grocer also added to the basket of donations with goods and money.

Build-it and Elgin Brown & Hamer Namibia donated building material worth tens of thousands of dollars.

During the hand-over, the mayor of Walvis Bay, Immanuel Wilfried, said since the beginning of this year, 43 shacks were destroyed. He also mentioned that over the past 16 months 103 families were left without a roof over their heads because of the shack fire scourge.

"We can always count on the community of Walvis Bay to reach out with a helping hand when people

suffer this devastation and when they find themselves with nowhere else to go. It is heart-warming to see that big business and individuals alike always help where and with what they can," he said. The chief of the Walvis Bay Fire Brigade, Dennis Basson, said shortly after the latest incident that members struggled to extinguish the fires because the heads of the nearby fire hydrants has been stolen to be sold for scrap metal. This slowed down the fire brigade's ability to extinguish the fires quickly because members were forced to cart water in tanker trucks to the site to battle the blaze.

The heads of fire hydrants is usually manufactured from brass, which has a high value when sold as scrap metal.



SAFETY FIRST: The chief of the Walvis Bay Fire Brigade, Dennis Basson and the Mayor Immanuel Wilfried with Round Table members Jens van Vuuren, Byron Westerdale and Leigh Westerdale. Photo: Niel Terblanche

Chariot prepares for offshore drilling

Niel Terblanche

UK-based Chariot Oil & Gas has identified five structural prospects on two exploration blocks offshore Namibia and is preparing for a drilling program on this acreage.

Chariot holds a 65% interest and operatorship in Blocks 2312 and 2412A (the Central Blocks) in partnership with AziNam with 20% interest, and NAMCOR and a local partner Ignitus Oil & Gas hold a 10% and 5% carried interest, respectively.

Chariot, in conjunction with its partners, completed acquisition of a three dimensional seismic survey of approximately 2 600 square kilometres in February 2016, targeting leads identified in the north-western area of the Central Blocks.

According to the company's update, following an extensive evaluation of the combined 6 100 square kilometre three dimensional seismic dataset, Chariot has identified five new structural prospects. "These diposed prospects target the same good quality Upper Cretaceous deepwater turbidite reservoirs as penetrated in the Muroombe-1 well and are modelled to have received hydrocarbon charge from the proven, excellent quality Aptian marine source rocks identified in both the Wingat-1 and Muroombe-1 wells. These five new prospects add to the portfolio of principally stratigraphic

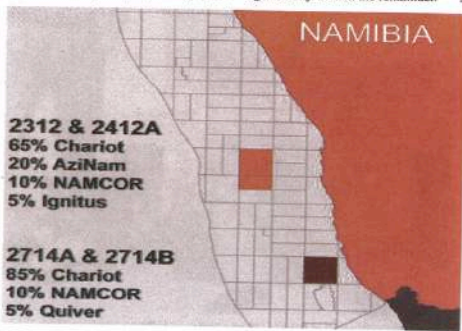
prospects and leads described from the legacy 3D seismic data," the company said. Chariot has initiated the process to prepare for drilling by undertaking an Environmental Impact Assessment over the new prospects identified from the 2016 seismic campaign.

In addition, the company said it is undertaking a contract strategy to identify an appropriate drilling unit, long-lead items such as wellheads and tubulars, auxiliary services and logistic base for well services, supplies, helicopters and medical evacuation.

The initial scope of work will be managed through Chariot's in-house team supported by Robert Mwanachilenga, Country Manager and Senior Staff Drilling Engineer, Namibia who was responsible for in-country support for the Tapir South-1 deep well operated by Chariot in 2012.

The target is to undertake this drilling in H2 2018 and the partnering process continues.

Larry Bottomley, Chariot CEO said: "The focus for Chariot is the delivery of transformational value through the discovery of material hydrocarbon accumulations. The maturation of the portfolio in the Central Blocks in Namibia has uncovered a series of robust, low risk structural traps that are targeting the proven play elements demonstrated in nearby wells. These prospects have the potential for material accumulations and success in one will significantly de-risk the remainder."



NOTICE OF ENVIRONMENTAL ASSESSMENT AND PUBLIC PARTICIPATION PROCESS PROPOSED WALVIS BAY WATERFRONT AND MARINA, NAMIBIA

Applicant: WALVIS BAY WATERFRONT PROPERTIES (PTY) LTD

Project: Walvis Bay Waterfront Development and Marina

Proposed Activity: WALVIS BAY WATERFRONT PROPERTIES (PTY) LTD propose to develop land portions 4941 and 4939 current private open space to business space for the proposed Walvis Bay Waterfront. The project includes developing a marina for the proposed Waterfront.

Location: Walvis Bay, Erongo region, Namibia.



Application for Environmental Clearance Certificate: In terms of the Environmental Management Act (No 7 of 2007), WALVIS BAY WATERFRONT PROPERTIES (PTY) LTD is required to submit an application for Environmental Clearance to the Environmental Commissioner of the Ministry of Environment and Tourism for the above-mentioned project. The above-mentioned EIA is being conducted by Environmental Compliance Consultancy (ECC).

Review and Comment Period: The purpose of the comment period is to present the proposed project and to afford interested and affected parties (I&AP) an opportunity to comment on the project to ensure that all issues and concerns are captured and considered in the assessment.

A public meeting will be held on the 12th June 2017 at the Walvis Bay Town Hall from 5pm until 7pm.

Public Participation Process: Environmental Compliance Consultancy is undertaking the required environmental assessment and public participation process in accordance with the Act. I&APs and Stakeholders are required to register for the project at: <http://eccenvironmental.com/projects/>

Please note that only registered I&APs will be included in future correspondence regarding this process.

Social media platforms are available to keep up to date with the project, please follow these pages to be kept informed regularly:
<https://www.facebook.com/WalvisBayWaterfront/>
<https://www.facebook.com/environmentalECC/>

Alternatively please submit your name, contact information and interest in the project, in writing to Environmental Compliance Consultancy:

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Multirole vessel will be more productive

TUNACOR INVESTS IN FISHING VESSEL

The building of a brand-new fishing vessel through a smart partnership with a shipyard in Spain has opened up new opportunities within the marine industrial complex of Walvis Bay.

Niel Terblanche

Tunacor Fishing recently announced the construction of a locally developed and designed vessel which would fill a variety of roles when deployed in Namibian waters.

The Minister of Fisheries and Marine Resources, Bernard Esau, said that the Namibian fishing sector makes use of Namibianised or foreign vessels and that investment into the industry on this scale means that there is high hopes for the Namibian economy.

The MV Oshiveli will be a polyvalent steel stern trawler which is expected to have an operational life of 40 years, with a displacement in excess of 1 200 tons, a cargo capacity of 500 tons, measuring 53 meters long and 11.5 meters wide. It is anticipated that this will be the first of many fishing vessels built by local companies in the years ahead.

An investment of NS160 million will be required to build the Oshiveli and construction is expected to take 18 months. It will be the first dedicated vessel capable of being converted to catching at least three of the main commercial species

in Namibian waters, namely hake, monk, as well as horse mackerel. Esau said the fact that the vessel is designed to fulfil more than one role means that it will not stand idle and will be able to produce fish at a high rate.

"More skilled people within the marine sector will be able to manufacture and service our equipment, without the need for recourse to imported labour," he added.

Esau went on to say that private and public entities must diversify the sector through value addition and innovation, encouraging self-reliance and sustainability.

The director within Tunacor Group, Peya Hitula, stated at the launch that the construction of the new vessel will benefit Namibia through improved operational capabilities, increased fuel efficiency, and the development of a more competitive and sustainable fleet. It is anticipated that this improved fleet will be both safer for the crew and friendlier to the environment.

"The benefits to the Namibian economy as a result of this project include the 200 direct jobs we expect to create by building this vessel. Sixty of these positions will be

onboard and 140 will be land-based. There will also be hundreds of jobs indirectly created in the supply, maintenance and logistic chains," Hitula said.

Since Namibia does not yet have a local ship building facility, the hull construction has been allocated to a Spanish shipyard Armon Shipyards, which also constructed the MV Hifikepunye Pohamba, the newly-commissioned Namibian Police marine patrol vessel.

Construction will be supervised by the Directorate of Maritime Affairs, while quality control will be overseen by Lloyds Register, one of the most respected marine surveyors and classification societies in the world.



SHIP OUT: The Minister of Fisheries Bernard Esau, director of Tunacor, Andimba Toivo Ya Toivo, Erongo Governor Cleophas Mutjavikua, and the Mayor of Walvis Bay, Wilfried Immanuel. Photo: Niel Terblanche

Esau slams NAMFI management

Niel Terblanche

The announcement of the new members of the board of directors for the Namibian Maritime and Fisheries Training Institute (Namfi) turned into an embarrassment for both the management and the Minister of Fisheries and Marine Resources, Bernard Esau, recently.

Esau announced the new members of the board, but was told by the managing director of the institute that they did not prepare a complete annual report for the minister to peruse. When the new board members were supposed to sign their performance agreements, none of those were prepared either and the ceremony had to be postponed.

"I cannot accept this. This not the way things are supposed to be done. The board must come back and explain some of the documents and also hand over all reports to the new board members, and only then will I be in a position to even comment on Namfi," an irate Esau said.

Namfi was formally established in July 1996 by the ministry of fisheries as a trust to provide maritime and fisheries training in order to enable students to take up qualified positions within the maritime and fisheries industries in Namibia and elsewhere.

Esau also did not accept the financial records and other bundles of documents from the Namfi board and management because none of them were signed off by the outgoing board members. He noted that some of the key documents were not complete



FUMING: Fisheries Minister Bernard Esau. Photo: Niel Terblanche

while others are not in order.

Before the meeting started, the minister was informed of the situation by the person in charge and that put a sombre atmosphere on the meeting when Esau said that the actions of the management blaming the board and vice versa is unacceptable. He said shifting the blame would not rectify the situation and that drastic action should be taken by both the management and the outgoing board members to ensure that the work is properly done and handed in to him as quickly as possible. Esau ordered that the new board of directors of Namfi take charge of the institution's affairs and not be controlled by management.

The new board of trustees are Connie Pandeni, who will also serve as the Chairperson, Chris Fikunawa, Lukas Kafuna, Sharon Neumbo, Aina Ipinge, Sezuni Sioka and Hilda Bone.

Neumbo and Ipinge formed part of the outgoing board.

The new members will serve for the next three years.

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Mr JS Bezuidenhout or Ms J. Mooney
Environmental Compliance Consultancy (ECC)
Registration Number CC/2013/11404
PO Box 91193, Klein Windhoek
Tel: +264 81 633 1271
E-mail: enquiries@enviroconsultants.co.za
Website: www.enviroconsultants.co.za



FOR ALL YOUR COASTAL NEWS CALL:

Niel Terblanche
064 212 000 or
Email: nielt@tgh.na

6 JUNE 2017

COMMUNITY NEWS

NAMIB TIMES 11

MTC Swakopmund Mobile Home moves to Platz Am Meer

Swakopmund MTC's Mobile Home Express, formerly situated in Stadtmittel Centre in the town's central business district relocated to Platz Am Meer, the new high-end mixed-use mall development in Vineta. The business rebranded to MTC Mobile Home Platz Am Meer.

The relocation was done following the request from MTC's customers, considering previously all two Mobile Homes were based in the CBD. It also in line with the Swakopmund local economic community development plan of extending services to the outskirts of town and away from the already congested CBD.

The move cost NS1 million. With a large reception hall, the new and trendy looking MTC Mobile Home Platz Am Meer is the choice of shop for the mobile telecommunications giant's customers in the coastal town of Swakopmund. It provides first class services to both locals and visitors alike.

The operating hours of the new mobile home is extended to provide convenience to all customers. The new operating hours are Mondays to Thurs-days 08:00 to 18:00, Friday 09:00 to 19:00, Saturday from 08:00 to 17:00 and Sundays and Public Holidays from 08:00 to 16:00.

"The new MTC Mobile Home Platz Am Meer makes essential telecommunications products and services readily available. These services allow us to showcase not only top class modern communications

systems that are easily access-ible across the country, but also that MTC recognises the importance of making these services available

to all corners of the country", says Tim Ekandjo, Chief Human Capital and Corporate Affairs Officer of MTC.



NCCI Walvis Bay Presents:

FNB NAMIBIA SPECIAL FUND & TAX EDUCATION TRAINING

The NCCI Walvis Bay Branch, in collaboration with FNB Namibia & the Ministry of Finance, is offering workshops on the SME Special Fund (FNB collateral free loan) & Tax education, respectively.

TAX EDUCATION SESSION

Date: 07 June 2017
Time: 09:00 – 13:00
Venue: Atlantic Hotel, Walvis Bay

FNB NAMIBIA SME SPECIAL FUND SESSION

Date: 22 June 2017
Time: 09:00 – 12:00
Venue: Atlantic Hotel, Walvis Bay

Please contact us for your booking, limited seats available.
Visit our offices at 57 Sam Nujoma Avenue, Walvis Bay.
Call or email us on +264 64 205 578 / wbccii@way.na



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Compliance Consultancy: Mr JS Bezuidenhout or Ms J Mooney
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P.O. Box 91193, Klein Windhoek.
Tel: +264 81 262 7872 or +264 81 853 1214
E-mail: info@eccenvironmental.com
Website: www.eccenvironmental.com



2. SITE NOTICES



3. STAKEHOLDER REGISTRATION FORM



INTERESTED AND AFFECTED PARTIES REGISTRATION FORM

PROJECT DETAILS

ECC Project Reference: ECC-41-54 Walvis Bay Waterfront

Project Title: Proposed Walvis Bay Waterfront Development

Applicant: Walvis Bay Waterfront Development Pty Ltd

This form serves to register Interested and Affected Parties (I&AP's) for the above-mentioned project(s) and to solicit input and participation. This form will be submitted to the competent authority for consideration in the decision making process.

INTERESTED AND AFFECTED PARTIES (I&AP) DETAILS	
Title (Mr/Mrs/Dr/Prof.):	
First Name:	
Surname:	
Cell Phone:	
Telephone other:	
Email Address:	
Postal Address:	
Organisation and/or property description (if landowner/lawful occupier)	
Stakeholder Group <i>(please tick)</i>	<input type="checkbox"/> Member of Affected Community <input type="checkbox"/> Non-Governmental Organisation (NGO) <input type="checkbox"/> Provincial or Government Official <input type="checkbox"/> Local or District Official
GENERAL INTEREST IN THE PROJECT	
Please describe the nature of your interest in this project.	



INTERESTED AND AFFECTED PARTIES REGISTRATION FORM

GENERAL INTEREST IN THE PROJECT	
<p>Do you have any specific concerns associated with the Project (for example: water, soil, pollution, Cultural or historical)?</p>	
<p>If you know of anyone else who should be informed about the project, please provide their contact details:</p>	
Title (Mr/Mrs/Dr/Prof.):	
First Name:	
Surname:	
Cell Phone:	
Telephone other:	
Email Address:	
Postal Address:	
Organisation and/or property description (if landowner/lawful occupier)	

ECC respectfully requests that you please sign this letter and return it to info@eccenvironmental.com to confirm that you have received notification with regard to the above, and to ensure that your comments, concerns or objections are recorded. All comments, queries, and concerns must be received via this I&AP registration form and questionnaire or alternate means. Please note that only registered I&AP's will included in future correspondence regarding this process.

Signed..... Name..... Date.....

4. PUBLIC MEETING ATTENDANCE REGISTER



Walvis Bay Waterfront – Public Meeting

ATTENDANCE REGISTER

Date : Monday 12th June 2017
Venue : Walvis Bay Town Hall
Time : 16:00 – 19:00

Meeting Chair:

Environmental Compliance Consultancy: Ms Jessica Mooney and Mr Stephan Bezuidenhout

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Gerhard Rossler	0811243628	grossler@iway.na	Walvis Bay
Yolanda van Rooyen	0811273993	yolanda.hitair@gmail.com	Private - Walvis Bay
Aiko Jansen v. Vuuren	0814812603	" " " "	" "
Johan VAN ZYL	0811285960	johan@anjoestates.com	ESTATE AGENCY

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David Koch	0812195962	dijkz@iway.na	Marie Visser Trust.
MURUNGA HANGURU	0811220807	marwal37@iway.na	Municipality of W/Bay

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PEYA HITULA	0811276792	pman347@me.com	WBAY/TUNACOR

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RIMCO NUKUSEB	081242708	R.NUKUSEB@gmail.com	Rimco Construction
Kim Visser	0816253453	Kim.jvr@hotmail.com	WFA

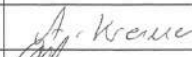


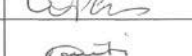
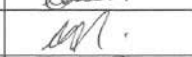


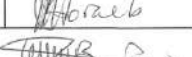

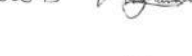


END 

5. MINISTRY OF FISHERIES AND MARINE RESOURCES

 23rd JUNE 2017

MFMR - Meeting Snakop.



Name	Address	Email	Cell Phone	Signature
Anja Kremer	Box 912 SWK	Anja.kremer@mfmr.gov.na	081 2396378	
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Anja van der Plas	"	anja.vanderplas@mfmr.gov.na	0812421591	
Victor Miti Libuku	"	Victor.Libuku@mfmr.gov.na	0811463142	
André van Niekerk	"	andre.vanniekerk@mfmr.gov.na	0811229342	
Deon Chaur	"	deon.chaur@mfmr.gov.na	081 1546600	
Frikkie Bates	"	Frikkie.Bates@mfmr.gov.na	0812240022	
Richard Horach	"	Richard.Horach@mfmr.gov.na	064 4101000/173	
Besau U Jizoo	"	besau.jizoo@mfmr.gov.na	064-4101159	
Levinia Nghimwoty	"	Levinia.Nghimwoty@mfmr.gov.na	0811226175	
Stephan Bezuidenhout	"	Stephan@eccenvironmental.com	0812027872	


WALVIS BAY WATER FRONT DEVELOPMENT PROJECT
UNDERTAKING OF MEETING – MINISTRY OF FISHERIES AND MARINE RESOURCES MEETING

PROJECT: WALVIS BAY WATERFRONT

VENUE: Ministry of Fisheries and Marine Resources Office Swakopmund

DATE: 23rd June 2017

TIME: 09:00 – 10:30

Environmental Compliance Consultancy (ECC) meeting with Ministry of Fisheries and Marine Resources (MFMR) stakeholder engagement meeting regarding the proposed Walvis Bay Waterfront Development.

Attendees:

Attendance register attached at the end of this document.

Proceedings:

ITEM	DESCRIPTION	PERSON
1	Welcome and Introductions	
	All members were welcomed and they were requested to introduce themselves to the meeting group.	Ms Jessica Mooney
2	Purpose of Meeting	
	The purpose of the meeting was to engage with MFMR regarding the proposed Walvis Bay Waterfront project.	Ms Jessica Mooney
3	Discussion Session	
	- Set out below	



COMMENTATOR:	QUESTION, QUERY, CONCERN ASKED:	RESPONDED BY:	RESPONSE
MFMR	<ul style="list-style-type: none"> Mrs Anja Kreiner greeted everyone and welcomed all to the meeting. All meeting attendees introduced themselves 	ECC	<ul style="list-style-type: none"> ECC thanked Mrs Kreiner and the MFMR team for their time and opportunity to discuss the EIA and project.
		ECC	<ul style="list-style-type: none"> An update on the project and a background into the stage of the ESIA Explained the engagement process undertaken to date and that government and specialists have been engaged throughout the project Explained ECC had initiated the conversation with the MFMR in Walvis Bay. Explained that RAMSAR and MET have been consulted regarding the project Explained that the public meeting held was to obtain insights from the stakeholders into the concerns and questions regarding the project and unfortunately MFMR were unable to attend, hence the meeting today. Explained that the project is a joint venture and explained the project ownership Explained the breakwater wall to be constructed, the depth of excavation to cater for the marina and the marina is in the design Explained that the marina will include some form of a lock and channel allowing a permanent water body in the channel. Explained that the water in the channel will be constantly moving and flushing will occur Explained the design of the breakwater wall, and that this has been a critical element in the design and the EIA process to understand the impacts that the wall may have on the marine environment



COMMENTATOR:	QUESTION, QUERY, CONCERN ASKED:	RESPONDED BY:	RESPONSE
MFMR	<ul style="list-style-type: none"> MFMR member asked the total size of the project area 	ECC	<ul style="list-style-type: none"> Explained the total project size is approx. 9 ha.
		ECC	<ul style="list-style-type: none"> Explained the position of the breakwater wall size and that it is located near the Raft Explained that from a social point of view the Raft is important as it retains the character of Walvis Bay however the public have mixed feelings about if the Raft if it should remain or be removed.
MFMR	<ul style="list-style-type: none"> MFMR Member asked if the esplanade road will be closed 	ECC	<ul style="list-style-type: none"> Confirmed that it would be, and a traffic impact assessment is being conducted to understand the potential impacts to traffic as a result of the project. Explained that the proposed Waterfront will link into the existing landscape Explained that the design of the breakwater wall is still being determined based on the EIA and EIA team advice
MFMR	<ul style="list-style-type: none"> Mrs Anja Kreiner explained that the scope from MET included recommendations from MFMR 	ECC	<ul style="list-style-type: none"> Explained that consultation had taken place with Namport and UNAM to obtain bathymetry survey data from the lagoon to demine the access channel and breakwater wall – unfortunately no new data was made available to ECC Explained that as a result a new bathymetry study was conducted for the project area and that data is available and has been shared with any stakeholder requiring the data. Explained that the survey revealed that two channel exist in the lagoon Explained Delta Marina Consulting (DMC) had been commissioned to conduct a hydrodynamic study as per the scope of work issued by the MET
MFMR	<ul style="list-style-type: none"> Member asked if the channels are natural or man made – naturally made. 	MFMR	<ul style="list-style-type: none"> Member explained that the channel in the lagoon had been dredged in the past.



COMMENTATOR:	QUESTION, QUERY, CONCERN ASKED:	RESPONDED BY:	RESPONSE
MFMR	<ul style="list-style-type: none"> Mrs Anja Kreiner explained the importance of the EIA to consider the no go option. Has the option not to have a marina been considered? 	ECC	<ul style="list-style-type: none"> Explained that all marina options are being considered including no marina, linking the marina with Namport and alternative designs Explained that the developer has revised the plans 18 times taking into consideration community and stakeholder feedback. Explained that feedback from the EISA team including Dr Rob Simmons has influenced the design of the breakwater wall including the orientation Explained that it is also in the best interest of the developer that the breakwater wall does not impact on the flow of the lagoon as it they too do not want sediment build up in the marina
MFMR	<ul style="list-style-type: none"> MFMR Member asked if the current Waterfront area is part of this development. 	ECC	<ul style="list-style-type: none"> Explained that it is not. Explained that Namport had proposed a Waterfront however it to date it has not been considered a committed project, to our knowledge Ministry of Finance had not committed to fund the project.
MFMR	<ul style="list-style-type: none"> MFMR Member mentioned that opening the Lagoon up which is a RAMSAR site could cause degradation to the whole lagoon. 	ECC	<ul style="list-style-type: none"> Explained that the lagoon will not be 'opened up' for boats but rather an access channel will be maintained for boats to reach to Marina which is approx. 200m from the existing boat ramp which that is located within the lagoon and RAMSAR site
MFMR	<ul style="list-style-type: none"> Mrs Anja Kreiner mentioned that motor boats are not permitted in the Lagoon 	ECC	<ul style="list-style-type: none"> Boats from the marina will not enter the lagoon beyond the marina. Explained that boats access the Lagoon with the current boat ramp less then 200m from the proposed opening of the marina.
MFMR	<ul style="list-style-type: none"> Mrs Anja Kreiner explained that Dr Rau's presentation mentioned that Marina Mammals are 	ECC	<ul style="list-style-type: none"> Explained that consultation with the Namibian Dolphin project is occurring and they will be involved in monitoring

COMMENTATOR:	QUESTION, QUERY, CONCERN ASKED:	RESPONDED BY:	RESPONSE
	able to adapt to change. However Mrs Kreiner explained there is an upper threshold to which they can adapt and that ECC must consult with Dr Simon Elwin.		<p>the marina mammals for the project.</p> <ul style="list-style-type: none"> ECC mentioned that the marine mammal report should be read to understand the context of the slides. This context was presented and explained at the public meeting.
MFMR	<ul style="list-style-type: none"> Member asked what kind of boats will the marina accommodate some yachts have a deep draft 	ECC	<ul style="list-style-type: none"> Response that yes boats with a deep draft will use the marina and therefore the marina will be excavated to a depth to accommodate boats in the marina.
MFMR	<ul style="list-style-type: none"> MFMR Member explained that the Swakopmund Waterfront has a very large marina that is completely underutilised and constructed incorrectly that doesn't permit safe boat access MFMR Member mentioned that the potential users of the Waterfront would be motorized boats as these are the boats that are used for marine tourism so the Marina must be practical for those users MFMR Member mentioned that you cant use the Swakopmund waterfront marina because the design is totally wrong and unsafe MFMR mentioned that the marina must be practical. 	ECC	<ul style="list-style-type: none"> Explained that the there is a number of differences between the Swakopmund waterfront compared the proposed Walvis Bay waterfront in that there is no facilities of this nature available in Walvis Bay. (Unlike Swakop who already had the Mola) There are a number of tourists that visit Walvis Bay but leave and return for the evening in Swakopmund due to the limited accommodation facilities in Walvis Bay. The design has been considered for Walvis Bay including input from local boat users, the design is critical for the developer to get right and has extensive experience in building marinas.
MFMR	<ul style="list-style-type: none"> MFMR Member asked if the hydrodynamic study will address simulations on tidal patterns MFMR member mentioned that there was a case in the Victoria Alfred Waterfront some years ago that there was rotting water in the cancel and it is critical that this is avoided in the Walvis Bay Waterfront. MFMR Member mentioned that the design is critical to ensure that the few days in which sulphur eruptions occur naturally in the water can be released to allow continued naturally flushing 	ECC	<ul style="list-style-type: none"> Confirmed the hydrodynamic model includes tidal patterns. Explained that the water in the inner channel will be circulated with pumps to avoid stagnant water the potential for foul smelling water.

COMMENTATOR:	QUESTION, QUERY, CONCERN ASKED:	RESPONDED BY:	RESPONSE
MFMR	<ul style="list-style-type: none"> MFMR member identified the area that aquaculture is taking place outside of the lagoon and reference to aquaculture within the lagoon should be corrected. 	ECC	Noted to be corrected.
MFMR	<ul style="list-style-type: none"> MFMR Member mentioned that from discussions with Namport have shown that the outward flow out of the lagoon has slowed down since the container terminal; and to a point that some boats can not access certain areas of the lagoon any more due to sedimentation MFMR member stated that the he sits on the environmental committee for Namport and that the committee has identified that the flow of water out of the Lagoon is slower then what it was contributing to sedimentation and that Namport may look at dredging parts of the lagoon MFMR Member mentioned that there is a discussion with Namport at the moment to dredged an area to maintain access to the lagoon MFMR Member mentioned that the Namport design was intended to be an open bridge but during construction it was decided that would not be functionally therefore they constructed a solid structure. 	MFMR	<ul style="list-style-type: none"> The group had a discussion about the fact that there are cases when an EIA is conducted for example Namport and then when construction starts changes that are material are implemented. Often these changes are made without consequence, or for example in the case of the Swakopmund Waterfront no EIA is completed and there is no consequence for the developer.
MFMR	<ul style="list-style-type: none"> A MFMR member mentioned that the Walvis Bay Waterfront marina intake would impact on the flow at the mount of the lagoon. A MFMR member stated that there will be less circulation in the Lagoon due to the changes in flow from Namport 	ECC	<ul style="list-style-type: none"> Explained that the developer does not want to impede on the flow of the lagoon as it negatively affect their marina so it is in the best interest of the developer not to do this. Furthermore the Hydrodynamic modelling is being conducted to ensure the proposed project does not impact on the lagoon.

COMMENTATOR:	QUESTION, QUERY, CONCERN ASKED:	RESPONDED BY:	RESPONSE
MFMR	<ul style="list-style-type: none"> A member of MFMR stated that the marina will silt up, it will smell and it will provide a suitable environment for sulphur eruptions and phytoplankton blooms and it will become smelly. 	MFMR ECC	<ul style="list-style-type: none"> A member of MFMR in response to the comment mentioned that if the water is able to pass through and circulate this might not occur Explained that there is circulation and engineering designs to ensure that circulation is promoted in the Marina to ensure that stagnant water does not occur. Gave an overview of the design and the planned pumping system to prevent stagnant water. Explained that the Marina itself will be tidal and therefore not a closed system that will create stagnant water as suggested. Explained that the Marina and access to the Marina is very close to the existing boat ramp and slip way (less than 200m) and boats will not be permitted into the Lagoon beyond the Marina
MFMR	<ul style="list-style-type: none"> A member of MFMR mentioned that there is anaerobic water at shallow depths near the Raft Restaurant. If you dig there the water is black, and boats will create turbulence in the marina and therefore the water will become smelly. 	ECC	<ul style="list-style-type: none"> Explained that the Marina will be excavated during construction to a suitable depth and therefore the daily operations of Boats in the Marina will not contribute to this as suggested
MFMR	<ul style="list-style-type: none"> A member MFMR asked how the lock and the canal will work and 	ECC	<ul style="list-style-type: none"> ECC gave an explanation on the functioning of the system
MFMR	<ul style="list-style-type: none"> MFMR member asked how will boats access the canal during low tide and what options are being considered for the lock area. 	ECC	<ul style="list-style-type: none"> Explained that several options are being considered and the design team are investigating alternatives including the use of a sling or crane; these options will be presented in the report.
MFMR	<ul style="list-style-type: none"> Member mentioned that the statement that the Marine Mammals will adapt required clarification 	ECC	<ul style="list-style-type: none"> ECC explained that this is likely a misinterpretation of information read on a slide note without having read the



COMMENTATOR:	QUESTION, QUERY, CONCERN ASKED:	RESPONDED BY:	RESPONSE
	<p>what will the marina mammals adapted to? The noise, the changes etc.? Is there going to be monitoring for the marina mammals.</p> <ul style="list-style-type: none"> • Mrs Kreiner mentioned that cumulative impacts on marine mammals should be considered • Mrs Kreiner mentioned that Dr Rau misquoted a paper from the NDP that marine tourism is a treat to Marine Mammals however this project wants to increase Marine Tourism. 		<p>full report. ECC encourages that the report must be read to understand the context.</p> <ul style="list-style-type: none"> • The focus is that the main access channel is not impeded as this is the hunting ground for mammals and the area they pass in an out and the main mitigation measure is that marina should not impact on the access channel • Informed the meeting that the marine mammal report includes the mitigation measures to ensure impacts to mammals are mitigated. • Mr Bezuidenhout confirmed that ECC is discussing with the Namibian Dolphin Project regarding ongoing monitoring to ensure the project does not impact marine mammals. • Mr Bezuidenhout informed the MFMR that the marine mammal report used available published data and that Dr Rau confirmed with the NDP of available published data.
MFMR	<ul style="list-style-type: none"> • MFMR asked if marine mammal monitoring will be conducted during the operational phase or only during construction 	ECC	<ul style="list-style-type: none"> • Confirmed monitoring will continue during operations
MFMR	<ul style="list-style-type: none"> • MRMF member stated the concern is that the monitoring measures will be left to the proponent to implement as with all other projects in the country. 	ECC	<ul style="list-style-type: none"> • Explained that ECC will continue to work with the proponent to ensure all monitoring and mitigations measures are implemented along with ongoing monitoring • Ms Mooney explained that ECC will ensure every measure is in place to help the proponent comply with laws and management plans



COMMENTATOR:	QUESTION, QUERY, CONCERN ASKED:	RESPONDED BY:	RESPONSE
			<ul style="list-style-type: none"> The Environmental Management Plan is a legally compliant document and the proponent must comply with the EMP
MRMF	<ul style="list-style-type: none"> MFMR member asked if ECC is aware of the studies being conducted by Namport and UNAM, Ms Mooney confirmed we are. 	ECC	<ul style="list-style-type: none"> Ms Mooney explained that consultation with Namport has been ongoing with regards to sharing of data and information
MFMR	<ul style="list-style-type: none"> Member asked about how the flow of water will be pumped, as the water will go into the lagoon. 	ECC	<ul style="list-style-type: none"> Confirmed that the water will be circulated in the lagoon and that therefore understanding the water quality is important Gave an example of the developers experience in relation to water circulation in a waterfront that includes rubbish collection traps designed into the marina
MFMR	<ul style="list-style-type: none"> A MFMR member indicated that the Cape Town Waterfront has phytoplankton blooms because an environment was created that was shallow and didn't promote circulation 	ECC	<ul style="list-style-type: none"> The benefit for the Walvis bay project is the learning's from other waterfronts can be carried over into the Walvis Bay Waterfront Ms Mooney asked the MFMR for studies or information they can provide ECC in relations to zooplankton for the Walvis Bay Area.
MFMR	<ul style="list-style-type: none"> The MFMR member propose that the development should consider an alternative that does not include a marina Marinas are expensive and the cost to park a boat in a marina is to high, the member believes the whole development could go ahead just leave the marina out The waterfront is a good idea but leave the expensive marina element out of the plan 	ECC	<ul style="list-style-type: none"> ECC to confirm with developers

COMMENTATOR:	QUESTION, QUERY, CONCERN ASKED:	RESPONDED BY:	RESPONSE
MFMR	<ul style="list-style-type: none"> Is the developer happy with the size of the marina and how many boats can use it? The design should be guided by the impacts of the EIA study and environmental advice 	ECC	<ul style="list-style-type: none"> Naturally any developer would want to have a larger area however they are working within the confines of what is practical and realistic minimising potential impacts to the environment. Mr Bezuidenhout explained that there have been a number of revisions of the design based on the feedback from the environmental team including the specialist.
MFMR	<ul style="list-style-type: none"> MFMR member mentioned that the wind could cause damage to the boats in the marina and the wind direction is a key consideration MFMR member indicated that the marina tourist would prefer to get in and out of a boat in a safe environment for example off a jetty in the marina 	ECC	<ul style="list-style-type: none"> Explained that there have been a number of revisions of the design based on the feedback from the community, and environmental team.
MFMR	<ul style="list-style-type: none"> A MFMR member asked how deep are the hauls of the boats that will use the marina? 	MWMR ECC	<ul style="list-style-type: none"> MRMW replied that it depends on each boat. MFMR member confirmed if constant circulation is maintained then there should not be a build up of stagnant water Ms Mooney confirmed the design will cater for boats of vary haul depths
		ECC	<ul style="list-style-type: none"> Impact on the marina mammals covered all potential aspects and the report is broad due to the fact that the design has not been finalised and the information from the from the specialist studies will inform the design and construction method to ensure impacts are minimised General mitigation measures have been provided

COMMENTATOR:	QUESTION, QUERY, CONCERN ASKED:	RESPONDED BY:	RESPONSE
			<ul style="list-style-type: none"> Ms Mooney explained that the MFMR will have an opportunity to review the reports and management plans and provide feedback Mr Bezuidenhout mentioned to the members that the public meeting someone raised a point that the focus is on the impacts to the marine mammal however what about the mammals living on the surface outside of the lagoon and the impacts to them? Mr Bezuidenhout explained that some of the members have shown us their basements with the current sewerage problems and the concerns they are experiencing
		ECC	<ul style="list-style-type: none"> Ms Mooney asked that the MWMF share information and research with ECC in order to ensure the ESIA is robust
MFMR	<ul style="list-style-type: none"> MFMR member asked how will the development will relate to the mall currently being construed 	ECC	<ul style="list-style-type: none"> Explained that the retail component will be informed on the market demand will depend on the retail market The Waterfront is designed to be an experience rather than a shopping mall
MFMR	<ul style="list-style-type: none"> MFMR asked what did the RAMSAR convention in Switzerland say in relation to the development. What did they say that something would be built in a RAMSAR site? 	ECC	<ul style="list-style-type: none"> Ms Mooney explained that they have an appointed Office in Namibian (Mr Holger) with whom we consult with. Ms Mooney confirmed that development could occur in a RAMSAR site, as RAMSARs mission is the sustainable wise use of wetlands. Ms Mooney explained that consultation with Holger confirmed that providing the impacts to birds, mammals

COMMENTATOR:	QUESTION, QUERY, CONCERN ASKED:	RESPONDED BY:	RESPONSE
			and hydrodynamic is understood then there should be a reason why the development should not proceed.
MFMR	<ul style="list-style-type: none"> MFMR member states that this might trigger a series of development along the lagoon front 	ECC	<ul style="list-style-type: none"> Explained that the any future or further development along the lagoon must be aligned with the towns approved strategic development plan.
MFMR	<ul style="list-style-type: none"> Mrs Kreiner mentioned that the cricket field people would be upset because their field is being relocated. 	MFMR	<ul style="list-style-type: none"> Ms Mooney explained that the relocation of the cricket oval will be to suit the need of the users and uplift other parts of the town that currently have not cricket facilities such as Kuisebmond
MFMR	<ul style="list-style-type: none"> MFMR members commented that the development would improve the area and uplift the site that is currently wastes space and underutilised 		
MFMR	<ul style="list-style-type: none"> MFMR mentioned that the sewerage issue is a key concern and the costs must be allocated for the relocation and improving the sewerage system 	ECC	<ul style="list-style-type: none"> Mr Bezuidenhout mentioned that the increase in guest houses, subdivisions of properties and the addition of Namport to the sewerage line has contributed to the sewerage problem
MFMR	<ul style="list-style-type: none"> Mrs Kreiner mentioned that Richard Franklin is the chair of the cricket Namibia board and that there is a conflict of interests if he supports moving the cricket field as it paves the way for the development to relocate the cricket field 	ECC	<ul style="list-style-type: none"> The conflict of interest has been declared up front.
ECC	<ul style="list-style-type: none"> A video was shown showing the overall concept of the marina and development. 	MFMR	<ul style="list-style-type: none"> Feedback from the video included discussion about the developer must consider the northwesterly winds and how boats will handle winds from the North West within the Marina. Tidal pools may present a problem Will beaches be realistic



COMMENTATOR:	QUESTION, QUERY, CONCERN ASKED:	RESPONDED BY:	RESPONSE
MFMR	<ul style="list-style-type: none"> Has climate change been considered and incorporated into the design 	ECC	<ul style="list-style-type: none"> Confirmed that climate change has been considered in the design
MFMR	<ul style="list-style-type: none"> What will happen should Donkey bay or pelican point be breached 	ECC	<ul style="list-style-type: none"> It would be very troublesome for the whole of Walvis Bay if this occurs, however the design will cater so such potential impacts
ALL	All points raised and no further points presented or discussed.	ECC	<ul style="list-style-type: none"> Ms Mooney thanked the members for their time and for their feedback during the meeting.

The meeting was closed at: 10:30 AM

Attachments:

- Attachment 1 –Meeting Attendance Register

6. STAKEHOLDER ENGAGEMENT



23rd May 2017

INTERESTED AND AFFECTED PARTIES LETTER RECEIVED FORM

PROJECT DETAILS

ECC Project Reference: ECC-41-54 Walvis Bay Waterfront
Project Title: Proposed Walvis Bay Waterfront Development
Applicant: Walvis Bay Waterfront Development Pty Ltd
Public Participation Period: 23rd May – 23rd June 2017

This form serves to ensure accurate records are kept with whom we have delivered the attached letter; we kindly request you complete this form for our records.

Name	Address	Email	Cell Phone	Signature
Anneline Rossouw	10 Esplanade rd. Wil Bay	fran@mvweb.com.na	0812966010	Rossouw
Conrad de Beer	No 3 Lichard duys str	debeerconrad@gmail.com	0617556831	Conrad de Beer
Raine Young	No.1 Bramwell str	suzet.young@gmail.com	0814358902	Raine Young
Nie Adams	16 KR THOMAS STR	nampet@inay.na	0811276987	Nie Adams
BARBARA WEYLANDT	"	barbara@weylandt.info	085 129 8033	Barbara Weylandt
Urte van der Watt	17 Ke Thomas str.	veidun@westbanktransport.com	081085539	Urte van der Watt
NEGG DREYER	24 ALHA...cst	MEGAN@24ALHA...c.com	081242522	Megan Dreyer



Name	Address	Email	Cell Phone	Signature
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Schalk du Plessis	The Ratt	reservations@ theraft Restaurant.co.za	204877	
Clinton Byloo	Prelec Pelican	cm.pelican@byloo.com	061 214000	
PHILIP YOUNG	UAH 5th floor	PHILIP@UNITED.com.NA	061 277 800	



24th May 2017.

INTERESTED AND AFFECTED PARTIES LETTER RECIEVED FORM

PROJECT DETAILS

ECC Project Reference: ECC-41-54 Walvis Bay Waterfront

Project Title: Proposed Walvis Bay Waterfront Development

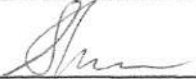
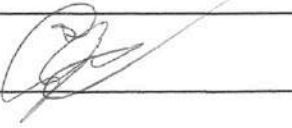
Applicant: Walvis Bay Waterfront Development Pty Ltd

Public Participation Period: 23rd May – 23rd June 2017

This form serves to ensure accurate records are kept with whom we have delivered the attached letter; we kindly request you complete this form for our records.

Name	Address	Email	Cell Phone	Signature
DAVID UUSHONA	WB Municipality	DUUSHONA@WALVISBAYCC.ORG.NA	0811220814	
Johannes Kaiyamo	WB Municipality	j.kaiyamo@gmail.com	0811292143	
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Lettie Visser	26 KR Thomas St	orchidajm@gmail.com	0813556749	



Name	Address	Email	Cell Phone	Signature
Sonia	28 KR Thomas St	sonia.vainzyl@gmail.com	0812772992	
SR Van Wijk	21 KR Thomas St		0811293217	
C.J.H. Grobbel	30 KR Thomas	grobbel.casper00@gmail.com	0812335259	

7. NAMPORT



Walvis Bay Waterfront – Stakeholder Meeting

ATTENDANCE REGISTER

Date : Monday 14th August 2017
Venue : Namport Office
Time : 14:30

Full Name	Cell Phone	Email	Position
Jessica Mooney	081 653 1214	jessica@ecc-environmental	EIA consultant ECC
Derik van der Merwe	083 275596 (027)	dfudmerwe@telkomsa.net	Development Manager
André Olivier	085 629 0805	andre.oliviere@bigenkumba.com.na	Engineering.
Karin Harry	0811246742	k.harry@namport.com.na	Namport.
Basen UCRAS	0811002636	bisey@namport.com.na	CEO/Namport
Muronga Hanigaya	0811220807	mhanigaya@walvisbaycc.org.na	CEO Walvis Bay CC
Titus Mshumbe	0811248123	titus@afrikumba.com.na	Executive Director Afrikumba
CONRAD SCHEFFER	0811293125	conradwb@iway.na	ARCHITECT
S. Bezuidenhout	0812627872	stephan@ecc-environmental.com	EAP – ECC
T. I. Hanabek	0812299636	tino@namport.com.na	Namport Commercial


WALVIS BAY WATER FRONT DEVELOPMENT PROJECT
UNDERTAKING OF MEETING – NAMPORT MEETING

PROJECT:	WALVIS BAY WATERFRONT
VENUE:	Namport Office Walvis Bay
DATE:	16 th August 2017
TIME:	14:30 – 15:30

Walvis Bay Waterfront developers and Namport had an opportunity to discuss the proposed Walvis Bay Waterfront and the potential Namport Waterfront to consider pertinent issues surrounding the proposed waterfront developments.

Attendees:

Ms Jessica Mooney	-	Environmental Compliance Consultancy
Mr. Stephan Bezuidenhout	-	Environmental Compliance Consultancy
Mr. Conrad Scheffer	-	Walvis Bay Waterfront Architects
Mr. Titus Nakuumba	-	Afrikuumba (Project Developer)
Mr. Kevin Harry	-	Head of Finance (Namport)
Mr. Derick van der Merwe	-	Walvis Bay Waterfront Development Pty Ltd
Mr. André Olivier	-	Bigenkuumba Construction Services
Mr. Baser Uirab	-	Baser Uirab (also acting as meeting chair)
Mr. Muronga Haingura	-	Walvis Bay Municipality CEO
Mr. L.T Hanbeb	-	Namport
Mr. Cliff Shikuambi	-	Ex. Assistant to CEO (Namport)

Proceedings:

ITEM	DESCRIPTION	PERSON
1	Welcome and Introductions	
	All members were welcomed and they were requested to introduce themselves to the meeting group. Apologies: Namport Engineer, Mr. Elzevir Gelderbloem	Mr Bisey Uirab
2	Purpose of Meeting	
	The agenda of the meeting was discussed and accepted (attached appendix A). The purpose of the meeting was to engage with each party regarding the proposed Walvis Bay Waterfront project. The meeting was called by the Walvis Bay Waterfront team who requested a meeting with Namport to discuss the project.	Mr Bisey Uirab
3	Discussion Session	
	-	

	<p>that there are two proposed waterfront developments, but one is certain and the other is not. Stress must be given to the community to understand that the proposed developments are ‘needs’ driven.</p> <ul style="list-style-type: none"> • In terms of planning for the future of the two developments there is need to establish a committee that communicates on plans and decisions for the two projects. • Emphasis was given to Namport on infrastructure sharing is to enable affordable decisions in relation to serving and routing. Thus it would be less complicated to service and route with Namport Waterfront development being incorporated into bulk services planning. • Water, electricity and communications also need to be handled the same manner as the sewer situation will be handled. 		<p>constructed seamlessly.</p> <ul style="list-style-type: none"> • If development does go ahead without Namport’s decision it would be possible for the Municipality to sell the land inclusive of bulk servicing infrastructure. • The agreement to get future developers of Namport to contribute should not be difficult. The cost of putting in their own infrastructure would be significantly higher if implemented separately at a later stage than sharing the services cost now between the two projects.
<p>Mr Bisey Uirab</p>	<ul style="list-style-type: none"> • The major points of action noted: <ul style="list-style-type: none"> - Namport to compile a letter for Walvis Bay Waterfront outlining their position and how the two projects will interrelate to ensure the best outcome for the environment and the community. - ECC to meet with Elzevir of Namport to obtain relevant data and sharing of information - Establishment a working committed between Walvis Bay Waterfront project and Namport’s waterfront development. 	<p>Ms Jessica Mooney</p> <p>Mr Stephan Bezuidenhout</p>	<ul style="list-style-type: none"> • Agreed on the points of action. Namport to submit letter before the end of the month for inclusion in the EIA report. • Emphasized the importance of transparency on the carrying out the projects and recommended that if the two developments work together it can improve the perception of people regarding the proposed developments.

The meeting was closed at: 15:30 PM

Attachments:

- Attachment 1 –Meeting Attendance Register



NAMIBIAN PORTS AUTHORITY

Enquiries: E. Gelderbloem
Tel.: +264 (0)64 208 2376
Fax: +264 (0)64 208 2333

Our Ref.: Afrikuumba waterfront

08 September 2017

Titus Nakuumba
Walvis Bay Waterfront Property Pty
P O Box 90885
Klein Windhoek
Windhoek
Namibia

Dear Mr Nakuumba

NAMPORT INPUT ON THE AFRIKUUMBA WATERFRONT AND MARINA DEVELOPMENT PROJECT

Our meeting held on 16 August 2017 refers.

Firstly we would like to again congratulate you on the progress made thus far on this very exciting project. We believe that, together with the Namport waterfront and marina project, these two developments will greatly enhance the existing recreational, tourism and hospitality sectors in Walvis Bay.

This letter serves to give our formal input into your Environmental and Social Impact Assessment studies that are currently underway. Whilst some of the aspects we highlight in this letter may not deal directly with the environment, they are nevertheless important to consider early on in your project.

Note that in the unlikely event that this letter should contradict the minutes of our meeting held on 16 August 2017, then this letter will overrule that minutes.

NAMPORT WATERFRONT AND MARINA PROJECT STATUS

The Namport Waterfront and Marina project is divided into two phases.

Phase 1: Marina development

This phase consists of a small boat marina and slipway located on the western side of the new container terminal causeway, see attached sketch. This location was chosen primarily to avoid future maintenance dredging, and also to stay as far away from the lagoon as possible. This phase of the project is already in construction mode (Environmental clearance is on file) and will be completed by end of 2018. The marina will thus be in service by early 2019.

Phase 2: Waterfront development

This phase consists of a modern waterfront development inclusive of retail, commercial, hotels, restaurants, museum, amphitheatre, etc. This part of the project will also be designed to interact very closely with the brand new cruise liner berth currently under construction inside the port. An expression of interest (EOI)

Port of Walvis Bay (Head Office):
P.O. Box 361 Walvis Bay, Namibia

Port of Lüderitz:
P.O. Box 836 Lüderitz, Namibia

Directors

Adv. GS Hinda
(Chairperson)
Ms. JJ Comalie
Mr. M Hindjow
Mr. J Kangandjera
Ms. N Hamunjela

Chief Executive Officer

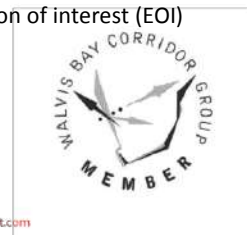
Mr. B Uirab
Company Secretary
Ms. N Haikali



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 www.namport.com

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Mr. B Uirab
Company Secretary
Ms. N Haikali



NAMIBIAN PORTS AUTHORITY

for sourcing private developer(s) closed in 2016. We expect to appoint developer(s) by 2018 if all goes as planned.

BULK SERVICES

Whilst we appreciate that there are inherent synergies in jointly designing and sharing the costs of the provision of bulk services to the two waterfront projects, we can unfortunately not make any commitments or considerations in this regards until such time that we have formally appointed our developer(s), which we expect to do sometime in 2018 if all goes as planned.

DREDGING IN AND AROUND THE LAGOON

The design of your proposed marina will invariably require capital and maintenance dredging both inside and outside the lagoon. Such dredging could be required to extend all the way from the lagoon mouth up to the new Namport Marina, since this area is also quite shallow. Namport has never done dredging inside or close to the lagoon in the past and we also have no in-house equipment to do such dredging in the future. All dredging which Namport does are outsourced to international private dredging contractors.

Any dredging done in or around the lagoon will be “environmental dredging” in which certain mitigation measures are adopted such as restricted overflow etc. The dredging equipment to be used will have to be specialised equipment that can work in shallow water areas and such dredging is likely to be expensive.

Once capital dredging is completed, it is our view that you will be required to carry out maintenance dredging at relatively frequent intervals for as long as your marina is in service, primarily due to the dynamic nature of the lagoon where you have shifting sand banks and channels.

The environmental impacts from dredging in the lagoon will need to be studied carefully by yourselves with appropriate mitigation measures adopted where needed. Mass biological fatalities (birds, fish, etc.) can result from dredging in the lagoon.

NAUTICAL SAFETY

There is currently a restriction by the Ministry of Environment and Tourism that prohibits any motorised craft from entering the lagoon. This restriction would need to be lifted before Namport could allow any craft to enter the lagoon on the way to your marina.

A proper port engineering design will be required for the approaches to your marina, and depending on size of vessels anticipated, this might require a channel starting from somewhere in the bay and leading all the way into the lagoon to your marina entrance, complete with aids to navigation such as navigational buoys etc. All craft will comply at all times to port regulations.



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Mr. B/Uirab
Company Secretary
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Approaches to the lagoon mouth will need to factor in Namport's plans in that area. It is pointed out that the water area on the South-Western side of the new Namport Marina channel will continue to be used for single point moorings of recreational craft. Access to the lagoon mouth by craft will thus need careful consideration.

STABILITY OF THE LAGOON AND MONITORING

The issue of the siltation of the lagoon is more than 50 years old and should thus not be seen as a new problem. For example, the South African authorities intervened in 1975 by doing dredging in the lagoon to keep it open. To date several comprehensive studies has been completed over many decades which focused on the wellbeing of the Walvis Bay lagoon of which the more recent one was carried out by Namport as part of the environmental impact assessment (EIA) study for the new container terminal project currently under construction. The Namport EIA concluded that our new container terminal project, which includes our marina development, will not have any adverse effects on the lagoon.

As part of our commitment towards ensuring the wellbeing of the lagoon, we have committed to doing physical monitoring of certain parameters in the lagoon for a number of years post construction. This monitoring work was outsourced to the University of Namibia who has already commenced with the monitoring work.

Yours sincerely



Bisey /Uirab
Chief Executive Officer

Cc: ECC
P O Box 91193
Klein Windhoek
Windhoek
Namibia
Attention Jessica Mooney



8. INVITATION TO PUBLIC MEETING - RAMSAR

info@eccenvironmental.com
www.eccenvironmental.com
+264812627872
+264816531214



REFERENCE: ECC-41-54-LET-
2nd June 2017

Ministry of Environment and Tourism
Private Bag 13306
Windhoek
Namibia

FOR ATTENTION: MR HOLGER KOLBERG AND MR KENNETH UISEB

Dear Sir,

**RE: INVITATION TO PUBLIC MEETING FOR THE WALVIS BAY WATERFRONT PROJECT,
WALVIS BAY, ERONGO REGION.**

Environmental Compliance Consultancy [ECC] on behalf of our client Walvis Bay Waterfront Development Pty Ltd would like to formally extend an invitation to you for the upcoming public meeting for the proposed Walvis Bay Waterfront. Details are provided below:

Location: Walvis Bay Town Hall
Date: 12th June 2017
Time: 4pm – 7pm

ECC uses a web-based platform for Stakeholders and I&AP who wish to register for the project. Please follow the link below to ECC website, selecting 'Walvis Bay Waterfront, Namibia' as the project.

o <http://eccenvironmental.com/form/>

We kindly request to have RSVPs received before the 7th July 2017. We look forward to hearing from you.

Yours sincerely



Stephan Bezuidenhout
Environmental Compliance Consultancy
Email: stephan@eccenvironmental.com



Jessica Mooney
Environmental Compliance Consultancy
Email: jessica@eccenvironmental.com

9. INVITATION TO PUBLIC MEETING – I&AP

✉ info@eccenvironmental.com
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📱 +264816531214



REFERENCE: ECC-41-54-LET-15-A
2nd June 2017

Stakeholders
Interested and Affected Parties
Proposed Walvis Bay Water Front

Dear Sir or Madam:

**RE: INVITATION TO PUBLIC MEETING FOR THE WALVIS BAY WATERFRONT PROJECT,
WALVIS BAY, ERONGO REGION.**

Environmental Compliance Consultancy [ECC] on behalf of our client Walvis Bay Waterfront Development Pty Ltd would like to formally extend an invitation to you for the upcoming public meeting for the proposed Walvis Bay Waterfront. Details are provided below:

Location: Walvis Bay Town Hall
Date: 12th June 2017
Time: 5pm – 7pm

ECC uses a web-based platform for Stakeholders and I&AP who wish to register for the project. Please follow the link below to ECC website, selecting 'Walvis Bay Waterfront, Namibia' as the project.

- <http://eccenvironmental.com/form/>

We kindly request to have RSVPs received by return email before the 7th July 2017. We look forward to hearing from you.

Yours sincerely



Stephan Bezuidenhout
Environmental Compliance Consultancy
Email: stephan@eccenvironmental.com



Jessica Mooney
Environmental Compliance Consultancy
Email: jessica@eccenvironmental.com

10. INVITATION TO PUBLIC MEETING – NEIGHBOURING BUSINESSES

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+264816531214



REFERENCE: ECC-41-54-LET-13-A
2nd June 2017

Graham F Howard
Director Hospitality, Gaming & Development
United Africa Group (Pty) Ltd
51-55 Werner List Street, Gutenberg Plaza, Ground Floor, Windhoek, Namibia
Direct Tel: +264 61 213 231 | Fax: +264 61 246 6660
E-Mail: graham@united.com.na

FOR ATTENTION: OWNERS OF PELICAN BAY HOTEL WALVIS BAY

Dear Sir,

RE: INVITATION TO PUBLIC MEETING FOR THE WALVIS BAY WATERFRONT PROJECT, WALVIS BAY, ERONGO REGION.

Environmental Compliance Consultancy [ECC] on behalf of our client Walvis Bay Waterfront Development Pty Ltd would like to formally extend an invitation to you for the upcoming public meeting for the proposed Walvis Bay Waterfront. Details are provided below:

Location: Walvis Bay Town Hall
Date: 12th June 2017
Time: 4pm – 7pm

ECC uses a web-based platform for Stakeholders and I&AP who wish to register for the project. Please follow the link below to ECC website, selecting 'Walvis Bay Waterfront, Namibia' as the project.

o <http://eccenvironmental.com/form/>

We kindly request to have RSVPs received before the 7th July 2017. We look forward to hearing from you.

Yours sincerely



Stephan Bezuidenhout
Environmental Compliance Consultancy
Email: stephan@eccenvironmental.com



Jessica Mooney
Environmental Compliance Consultancy
Email: jessica@eccenvironmental.com

11. STAKEHOLDER MEETING NOTES – PROTEA HOTEL



STAKEHOLDER MEETING – UNTIED AFRICA GROUP WALVIS BAY WATERFRONT DEVELOPMENT

MEETING NOTES

PROJECT: WALVIS BAY WATERFRONT

VENUE: AFRICA UNTIED GROUP - HEAD OFFICE 5TH FLOOR
GUTENBERG PLAZA, 51-55 WERNER LIST STREET WINDHOEK

DATE: 2nd June 2017

TIME: 09:30 - 10:30

A meeting was held with Africa United Group to discuss the process of the environmental assessment and to seek to understand potential issues or concerns of the stakeholder as identified owners of the Protea Hotel.

Mr Graham Howard delegated the meeting to his colleague Mr Philip Young. Mr Howard was an apology for the meeting.

ATTENDEES:
Ms Jessica Mooney - Environmental Compliance Consultancy
Mr Philip Young - Africa United Group

APOLOGIES:
Mr Graham Howard - Africa United Group

MEETING NOTES:

Ms Mooney gave an overview of the project and the Environmental Assessment being conducted by Environmental Compliance Consultancy.

Ms Mooney sought to understand the potential issues and concerns of the proposed project on the stakeholder, that being, the Protea Hotel.

The following summarizes the key concerns presented by Mr Young on behalf of the Africa United Group:

- The closure of the public open space and the implications of such for the community
- Mr Young enquired if the town planning aspects of the project have been thoroughly understood
- Mr Young mentioned that he was concerned about the construction and engineering integrity of the marina, that poor design could lead to odour problems associated with stagnant water
- Mr Young expressed concern that the retail component of the proposed development is not compatible with rate of development for the town and that the market growth doesn't support the development
- Mr Young expressed that the major concern is the access to the hotel and subsequently that the flow-thru traffic would be diverted away from the Pelican Bay Hotel towards the proposed Waterfront development.
- A concern regarding parking was also mentioned.

Ms Mooney extended an invitation to the Africa United Group to attend the upcoming public meeting.

The meeting concluded at 10:30am, Mr Young informed Ms Mooney he would be attending the public meeting.

12. MINUTES OF PUBLIC MEETING



PROPOSED – WALVIS BAY WATER FRONT DEVELOPMENT PROJECT UNDERTAKING OF MEETING – PUBLIC MEETING

PROJECT:	WALVIS BAY WATERFRONT
VENUE:	WALVIS BAY TOWN HALL
DATE:	12 th June 2017
TIME:	18:00 – 20:19

Members of the community had an open session between 16:00 – 18:00 with the project team to discuss details pertaining to the plans of the proposed development. Community members were encouraged to ask specific questions directly to the project team during this session to help I&AP understand the details of the project. In addition specialists were available to answer questions directly with the community members.

Panel Members:

Derick van der Merwe	-	Walvis Bay Waterfront Development Pty Ltd
Jessica Mooney	-	Environmental Compliance Consultancy (also acting as moderator)
Titus Nakuumba	-	Afrikuumba
Ziyad Adroos	-	Bigen Africa Engineering Services
Thinus van Zyl	-	Afrideca
Gert de Wet	-	Walvis Bay Waterfront Architects
Conrad Scheffer	-	Walvis Bay Waterfront Architects
Manfred Kloos	-	WML coastal
Agostinho Victor	-	Walvis Bay municipality
Dr Rob Simmons	-	Avian Impact Assessment

Attendees:

Attendance register attached at the end of this document.

Apologies:

MET Commissioner Mr Teofilus Nghitila
 MET Officials Mr Kenneth Uiseb and Mr Holger Kolberg
 MFMR Officials – Mrs Anja Kreiner and team
 I&APs: Mrs Sarah Goldsack, Mr Gary Goldsack, Mr Nic Adams and Ms Barbara Weylandt

Proceedings:

ITEM	DESCRIPTION	PERSON
1	Welcome and Introductions	
	All present were welcomed on behalf of ECC and the agenda confirmed. Apologies: MET Commissioner Mr Teofilus Nghitila, MET Officials Mr Kenneth Uiseb and Mr Holger Kolberg.	Jessica Mooney
2	Purpose of Meeting	
	The meeting is to allow the public an opportunity to learn about the project. To allow the public an opportunity to provide their comments, questions and concerns directly to the project team and open dialogue for questions and answers.	Jessica Mooney
3	Conduct of Meeting	
	• The public meeting is open to all stakeholders/I&AP and has been	Jessica Mooney

ECC-41-54-MOM-19-B (Final Version)
 Note: Draft revision period completed 20th June – 4th July 2017

Page 1 of 12

	<p>many people to attend.</p> <ul style="list-style-type: none"> • Meeting is there for I&APs to learn about the project and the Project team to learn from I&APs • Proceedings of the meeting were: <ul style="list-style-type: none"> - Questions are to be reserved for the Question and Answer session - Respecting opinions was emphasized. - Keep an open mind - Allow everyone to speak - Criticize issues, not people - Listen - Respecting time was emphasized - Please turn off cell phones 	
4	Background and overview of the project	
	<ul style="list-style-type: none"> • Project site was shown on a slide show, phases 1 and 2 sites illustrated and explained. • It was emphasized that the video is a concept to allow the public to understand the scale and nature of the proposed project. 	Jessica Mooney
	<ul style="list-style-type: none"> • Derick explained his background on Waterfront developments • An in-depth explanation of the development was explained covering proposed facilities, relocations and further considerations. See attached annexed proposed layout. • Emphasis was given that the project is for the people and it is intended to be the Walvis Bay community Waterfront. • The EIA is being conducted to ensure that the proposed development is undertaken to minimise potential impacts on the environment and community and allow a sustainable development • Emphasis was given that the purpose is to create a waterfront and tourism node to take tourism for Walvis Bay to another level. • The development will involve excavating the existing road to create the marina. Areas where the road will be developed were noted and explained. • A breakwater is going to be constructed temporarily to allow the smooth running of the project. It is important to note that the Walvis bay tide is not high. • The development will have a place where people can walk freely along and through the development • Residential provisions and considerations have been made and located at the back of the waterfront • Relocation of the Swimming pool, Tennis courts and cricket field • A conference centre and hotel will be constructed as part of the development. • A new road will be developed called “waterfront drive” and upgrading of intersections will take place as per recommendations from the traffic impact assessment. • A transport specialist study is being conducted by ITS (Innovative Transports Solutions). • The project specialist’s assessments will available on ECCs website and I&APs will be notified for their review. 	Derick van der Merwe
	<ul style="list-style-type: none"> • Development video was aired for the stakeholders to acquaint themselves further with the project. 	Derick van der Merwe
5	Overview of the EIA Process	
	<ul style="list-style-type: none"> • Environmental Compliance Consultancy ECC) background was given. • The EIA process will cover Magnitude of impact, duration, timing, etc. and 	Jessica Mooney

	<p>be conducted in accordance with the Act.</p> <ul style="list-style-type: none"> The meeting is being held to understand the community questions and concerns regarding the project. The impact assessment process is open to comments during the whole process and not limited time i.e. 21 days for commenting The importance of the Public involvement was emphasized because of the information that can emanate from the public in terms of possible impacts, solutions, proposed modifications to the development The public's concerns will be considered during the planning, construction and operation of the project Public Participation Process (PPP) is important for the decision makers to make decisions as the project has considered a wider range of perspectives and opinions. PPP benefits the developers as local knowledge is shared, key issues are identified by the public and measures to reduced impacts and enhance benefits are identified by the public. Studies currently being undertaken include: Avian Impact assessment, Traffic Impact assessment, Mammals impact Assessment, Social Impact Assessment etc. 	
6	Avian Impact Assessment	
	<ul style="list-style-type: none"> Dr. Rob Simmons was introduced and an overview on his background in relation to the project and previous projects was given. 	Jessica Mooney
	<ul style="list-style-type: none"> It was noted that Walvis bay is a Ramsar site, however does not have a legal status Walvis Bay Lagoon (Lagoon) is ranked globally in terms of bird species In Africa the Lagoon is ranked top on bird diversity with and it is important to note that it is an important wetland The Walvis Bay wetland is a harbour to a lot of migrant birds from across the world It is the top Wetland in Southern Africa It was noted that there has been a decline in bird populations, especially notable long-term decline in migrant birds However, the local birds and short migrant birds on the wetland are stable or increasing in population The lagoon, wetland and development was illustrated on a slide show. The lagoon is a biologically active area, Several species in the lagoon have shown decline, whilst other species are showing increase Stable or increasing bird species are more thriving in Saline conditions, indicating increase salinity on the lagoon Possible reasons for decrease in bird populations were listed based on research studies undertaken on the lagoon or Walvis Bay in general It is important to note that Benthic studies in 2013 identified Biologically dead zones in the lagoon. Trends of decline of birds on the lagoon indicated decrease after developments on the bay. Mitigation measure given included pollution control, light illumination must be reduced and developers have taken this into account (coloured lights) Conclusively the Ramsar site is of importance to note, decrease in bird species is due to decrease in tidal water flushing Thanks, was given 	Dr. Rob Simmons
8	Marina Mammal Impact Assessment	



	Dr. Amanda Rau was introduced, her academic background given.	Jessica Mooney
	<ul style="list-style-type: none"> • It was noted that there is little data available on marine mammals on Walvis bay, hence other literature where considered form different researched around the world • Dolphins, Seals and Whales are important species in the bay area • Possible impacts are expected during construction and post construction • Major impacts expected area: <ul style="list-style-type: none"> ○ Noise which may affect communication, and behaviours ○ Turbidity on the bay ○ During operation ○ Potential pollution from human waste ○ Increase in marine traffic ○ Altered feeding patterns ○ Organic injuries on the marine mammals ○ Human interaction (safety issues) • Animals to be affected during construction includes dolphins, whales and seals • During operation stage pile drive may affect several animals • Impacts on seals and dolphins was alluded in terms of frequency rates and comparison with studies in New Zealand. • Recommendations given included: <ul style="list-style-type: none"> ○ Visual acoustic monitoring by qualified specialist i.e. Exclusion zones for seals and dolphins • Pile driving is unlikely to cause long term impacts on Cape seals, dolphins and killer whales. • Dredging Impacts on the channel were noted and these included: <ul style="list-style-type: none"> ○ Broadband sounds emissions, however research in Hawaii indicated that dredging does not affect marine mammals except for dolphins that may approach the dredging equipment. ○ Turbidity in the area however sediment plumes are localised ○ Dredging will have limited impacts and mitigation measures will be required ○ Dredging effects are temporary hence there may be no need for intervention ○ Marine traffic impacts will be experienced from vessels entering the bay • Mitigation includes limiting vessels to designated shipping lanes, speed and route control and vigilance in terms of mammals in the area • Water Quality impacts will have to be managed by controlling storm water runoff and rubbish control measures • Effects on water quality if not managed may result in toxin accumulation, non-biodegradable water • Human interaction may affect marine animals diet and survival skills hence need for education on human aquatic life • Construction site waste control and access control • Conclusively impacts may be between medium to high during construction and low during operation. 	Dr. Amanda Rau
9	Q & A Session	
	-All members on the panel were introduced	

COMMENTATOR /I & A P:	QUESTION, QUERY, CONCERN RAISED:	RESPONDED BY:	RESPONSE
Mrs Anneline Rossouw	<ul style="list-style-type: none"> Walvis bay does not have a lot of green zones with pool, tennis court, cricket pitch and children playground on the area Why do we have to take the green zones? 	Titus Nakuumba Agostinho Victor	<ul style="list-style-type: none"> The commentator was asked if she owns a swimming school (<i>Response: 15 years ago I did but not anymore</i>) Walvis bay is growing hence the need for growth and development Green zones will be lost, but facilities will be replaced along with improvements. The project is not for the developers only because Walvis bay is a stakeholder in the development Sparta is being developed for a Cricket pitch which is also municipality pitch Sparta is fully occupied and there is a need for a second facility The majority of young cricket players are from areas of Walvis Bay that currently have no facilities and the idea is to also provide for these children with the relocation A background of the development was given, going back to 2003. AFRIKUUMBA is the only company that was interested in a JV for the project. We cannot stop development, we diversify sustainably Namport said they are focusing on the terminals and that waterfront developments are not their core area of business hence the municipality decision to move forward with the proposed development.
Mr Riaan Lottering	<ul style="list-style-type: none"> Sparta cricket pitch is mostly for professional players But on the affected pitch there are over 120 kids on rotation that come from residential locations far from the pitch Hence there is need for more pitches. 	Agostinho Victor Titus Nakuumba	<ul style="list-style-type: none"> There are plans to create more cricket fields, but it is important to note that there are three areas identified for the pitches. Emphasized that the budget is there and the president of cricket Namibia has been communicated to.

		Jessica Mooney	<ul style="list-style-type: none"> Interested people may make further communication to the president. The municipality is not sure of the exact site, but the developers want to hear from the public if they have recommendations? Alternatives and suggestions from the public were encouraged.
Peya Hitula	<ul style="list-style-type: none"> Praise was given to the developers Is there going to be an Olympic size swimming pool? Are there options for smaller pools? Has parking been considered? Have a hydro study been undertaken Impacts on seals are high Dead matter in the lagoon is increasing releasing sulphur, has been research been undertaken on this topic? How are we going to control sea colonies 	Conrad Scheffer Derick van der Merwe	<ul style="list-style-type: none"> The swimming pool is going to be 25 metres long with 7 lanes indoor heated swimming pool, more or less the same as the existing pool. <i>(NB - The agreement with the Municipality is that sports facilities of an equal standard, as a minimum, are to be provided at a mutually agreed alternative location).</i> The developer has 22 million for the relocation of existing sporting facilities and other amenities. I don't have the exact numbers in front of me and I speak under correction but I can tell you that there is enough parking space in fact adequate parking is provided at a rate higher than suggested by the town planning schemes. (More or less 6/100m² for retail and 2 per residential unit). Parking modelling has been completed. <i>NB - A detailed hydrodynamic study is being conducted as part of the EIA study that will address matters associated with water quality.</i>
Kim Visser	<ul style="list-style-type: none"> Is the pool going to be still Municipal 	Conrad Scheffer	<ul style="list-style-type: none"> The pool is going to remain municipal property
Mr Gerhard Rossler - Walvis bay resident	<ul style="list-style-type: none"> There are great impacts on mammals but impacts on people not considered People are being put on the background from animals 	Jessica Mooney	<ul style="list-style-type: none"> As part of the EIA a social impact assessment is being conducted to determine the social impacts associated with the project The social impact assessment will be available for review and input from the community Today's meeting is to focus on the inputs from the people to hear first hand what the community feels the impacts will be to them

			<p>will benefit the entire neighbourhood and not just the immediate project.</p> <ul style="list-style-type: none"> Electricity – The project will contribute a substantial amount of money towards the development of a new Substation in the area by Erongo. This would be in the order of 8% of the Capital required for the new substation. In general, it is important to note that Municipalities need and rely on projects of this nature to contribute with infrastructure upgrades requiring large upfront capital. This is in addition to all of the revenue opportunities that the project creates for the Municipality.
Bryan Nicolson	<ul style="list-style-type: none"> Flushing of the lagoon is expensive and will negatively affect the lagoon TSS monitoring has been conducted on the lagoon and high sediment readings show on the outgoing tide meaning that it is because of desert windblown siltation 	<p>Manfred Kloos</p> <p>Jessica Mooney</p>	<ul style="list-style-type: none"> Dry construction is being considered with use of breakwaters at the Yacht club Channel to be created by waterborne dredging equipment It is unlikely that the lagoon will be dredged as a whole ECC has contacted Namports environmentalists requesting for such data
Ms Vazembua Tjizoo	<ul style="list-style-type: none"> Avian impact assessment about the wetland the lagoon Requested the Avian basement slide How will the lagoon and the WB wetland be differentiated? Illustrated that the area proposed for development is a lagoon Emphasized on cumulative impacts and gave reference the need for incorporating seismic surveys data When is the EIA proposed for submission 	<p>Dr Rob Simmons</p> <p>Jessica Mooney</p> <p>Conrad Scheffer</p>	<ul style="list-style-type: none"> Explained that the marked area is the major area and where lagoon bird counts have been identified There is a difference between a lagoon and a primary lagoon Asked if a definition of lagoon can be sent Expected within in the next one to two months and I&AP will be notified of review periods and feedback encouraged Construction expected second half of next year
Andrew Angula	<ul style="list-style-type: none"> How are those people who live away from the development benefit? People in the other areas do not have homes and jobs, how will these people benefit? 	Derick van der Merwe	<ul style="list-style-type: none"> There will be job creation for local people For every 1 job created in the waterfront there will be an additional 3-5 jobs created outside of the waterfront The goal is to circulate money within the community for

Rowan McNamara	<ul style="list-style-type: none"> • Thanked for the development • Can the cricket pitch be considered in the residential areas because it can be used as a green zone as well? • Are motorboats allowed into the lagoon? 	I&APS Titus Nakuumba	<ul style="list-style-type: none"> • Unanimously agreed no motorboats allowed • Cricket pitch will be affected during phase two, hence the area for the cricket pitch will be a public open space • Four public beaches with green zones will be created since there is no formal access to the beach • Two public nodes will be created within the waterfront solely as free public open space
Danie du Toit	<ul style="list-style-type: none"> • Where will the boats come from? • Namport is already creating a marina/windbreak for the boats so where will these boats come from? • Highlighted that people can swim on the beach 	Derick van der Merwe	<ul style="list-style-type: none"> • There will be a porting point for recreational vessels especially from other bays • The raft will extend by 5m • The marina is being developed and docking preferences will depend on boats
Unidentified Female I&AP	<ul style="list-style-type: none"> • Is the project going to be built by Namibian companies 	Titus Nakuumba	<ul style="list-style-type: none"> • Developer is 100% Namibian company
Kim Visser	<ul style="list-style-type: none"> • Creation of free space is remarkable, but are the open spaces for the tourists or the public? • It is possible that this development will make the area expensive? • Is there enough data on the economics of the development? 	Derick van der Merwe Jessica Mooney	<ul style="list-style-type: none"> • Statistics show that in other waterfronts 70% of locals use the waterfront • Survey indicated that the development can only be feasible in phases to handle expenses • We need to make sure we keep conducting pricing surveys to ensure the Walvis Bay waterfront stays affordable • Social impact assessment will also investigate these questions
Mr Koot Potgieter	<ul style="list-style-type: none"> • Deals will be made like the dunes mall and construction jobs will be subcontracted to Chinese companies 	Agostinho Victor	<ul style="list-style-type: none"> • Municipality will ensure that Namibians will benefit
Mr Alan Louw	<ul style="list-style-type: none"> • Who is going to be responsible for the maintenance of the dredged channel • Developer will have to dredge the other area because Namport will not dredge the areas 	Titus Nakuumba	<ul style="list-style-type: none"> • Municipality will only maintain the area of the lagoon • The developer will also contribute to dredging costs.



ITEM	DESCRIPTION	PERSON
10	Where to from here and how to stay involved in the EIA process?	
	<ul style="list-style-type: none"> • Those not registered encouraged to register • 14 day commenting period will be given and I&AP will be notified when this period commences • Emphasis was given on registering comments in writing • Stakeholders can continuously check on the progress of the project on ECC website and social media 	Jessica Mooney
11	Conclusions and thanks	
	ECC and project team gives thanks on following the rules of the meeting and for attending.	Jessica Mooney

The meeting was closed at: 20:19 PM

Attachments:

- Attachment 1 – Public Meeting Attendance Register
- Attachment 2 – Proposed layout

13. NAMIBIAN DOLPHIN PROJECT



20 Nov 2017

Suggestions for use of a Marine Mammal Observer – Walvis Bay Lagoon

To whom it may concern

The Sea Search group, through its study the “Namibian Dolphin Project” has been researching the whales and dolphins (cetaceans) of Walvis Bay since 2008, with data running back considerably beyond that time. We are thus well placed to advise on the likely impacts of human activities on these animals at both the individual and population level.

We have been in contact with Ms J Mooney and Mr S Bezuidenhout of ECC Environmental, the environmental consulting company for this phase of the project to discuss potential impacts and mitigation methods for the proposed Walvis Bay Waterfront project to be built in the vicinity of the Raft restaurant and Protea Hotel at the north western side of the main lagoon.

The cetacean species most likely to be impacted by construction during this project (dredging, vibratory pile driving, vessels, general noise impacts) is the common bottlenose dolphin (*Tursiops truncatus*). The population inhabiting Walvis Bay numbers approximately 100 individuals, making it one of the smallest populations of any mammal in southern Africa. The population is already heavily impacted by other human activities within its range including marine tourism, large scale harbor expansion, prey depletion and desalination plants amongst others. A large proportion (possibly all) of the population uses the shallow waters of the Walvis Lagoon for feeding, socializing and resting on a regular basis (dolphins are recorded in the lagoon every week at least) and this area appears to be significantly important area for this population. Due to the shallow nature of the lagoon and the tidal range, dolphins have been known to live strand in the lagoon. Many animals have survived this, but some have died (NDP unpublished data). Given the small size of the population, any extra deaths or injuries which may occur to this population could have significant conservation implications for the population as a whole. Large amounts of noise produced at the mouth of the lagoon, may act to chase animals in or trap them in the lagoon, potentially resulting in them stranding on a dropping tide.

We strongly recommend that all possible efforts be made to minimize impacts of this population during the construction of this project.

Sea Search Africa. Business Registration Number: 2014/143760/07
4 Bath Rd, Muizenberg, Cape Town 7945.
+27 21 7881206 simon.elwen@gmail.com



Proposed mitigation: little is currently known about the details of the construction proposed at this point, but it is recommended that all effort is made to reduce:

- 1) **Siltation** in the water column - this may negatively affect prey fish as well as the dolphins directly.
- 2) **Noise** - dolphins are very acoustically sensitive as they use sound to find food and communicate. All effort should be made to reduce the **amplitude** as well as **duration** of any sounds produced whether they are directed (such as depth sounders) or a by product of other activity (such as engine noise, dredging or most importantly pile driving).

Mitigation suggestions include – 1) use vibratory rather than impact pile driving to reduce the amplitude of sound produced, 2) try to conduct all major noise producing activities such as pile driving and dredging simultaneously to reduce the duration of occurrence and noise producing produced, 3) keep unnecessary engines and depth sounders turned off when not in use., 4) use hydrophones to detect use and changes in use of the lagoon environment during construction compared to before and after, 5) employ a Marine Mammal Observer throughout construction to make sure a) dolphins are not in the lagoon before dredging or pile driving occurs and b) not within 1000m of either activity when they are occurring.

A marine mammal observer should ideally 1) conduct a survey of the entire lagoon from the salt works to the mouth daily, prior to any dredging or pile driving starting to know of presence and location of animals in the lagoon and 2) keep constant watch during these activities to ensure animals are not approaching into the lagoon near these activities when they are occurring. The construction crews should be prepared to delay or pause activities if animals come too close or need to depart the lagoon.

Yours sincerely,



Dr. Simon Elwen
Director Sea Search Africa & Namibian Dolphin Project
NRF Research Fellow, Mammal Research Institute, University of Pretoria

Sea Search Africa. Business Registration Number: 2014/143760/07
4 Bath Rd, Muizenberg, Cape Town 7945.
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14. RAMSAR ENGAGEMENT

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Ref: ECC-41-54-LET-06-A
22nd May 2017

RAMSAR
Rue Mauverney 28
CH-1196 Gland, Switzerland
T. +41 22 999 01 70
F. +41 22 999 01 69
E: ramsar@ramsar.org

FOR ATTENTION: RAMSAR SECRETARIAT

Dear Sir or Madam:

RE: RAMSAR SITE 742 - WALVIS BAY WATERFRONT PROJECT, WALVIS BAY, ERONGO REGION.

Environmental Compliance Consultancy [ECC] has been engaged by our client Walvis Bay Waterfront Development Pty Ltd to undertake the Environmental Impact Assessment for the proposed Walvis Bay Waterfront development.

ECC has commenced with the EIA as per the project scope for the assessment received by the Ministry of Environment and Tourism (Appendix 1).

Unfortunately no response was received from RAMSAR to the email sent on the 1st February 2017 (Appendix 2); therefore this letter serves as a formal follow up to the initial email.

ECC would like to ensure that RAMSAR is involved and notified of the project and allow an opportunity for RAMSAR to provide feedback and input into the project, if they choose to do so.

The proposed project includes developing a small area of the lagoon into a marina and an on-land waterfront as part of the project – see figure 1 below.



Figure 1 - Proposed Development Site

Specialist studies have been conducted to determine the potential impacts the proposed project may have on the lagoon. The specialist studies include:

- Potential Impacts on Marine Mammals in the Walvis Bay area with respect to the proposed Waterfront Development – Author Dr. Amanda Rau
- Potential Effects on Birds of the RAMSAR Site – Author Dr. Rob Simmons

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- Hydrodynamic Modeling to determine potential effects on the lagoon with respect to the proposed Waterfront Development – Author Dr. Hendrik Bergmann Delta Maine Consultants

ECC will provide a copy of the EIA to RAMSAR for comment and review as per the public participation process as outlined in the Namibia Environmental Management Act, 2007.

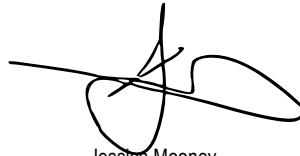
Our client is committed to ensuring the sustainable utilization of natural resources in accordance with the Namibian constitution. Furthermore the client will ensure the project upholds the RAMSAR convention' pillar regarding the wise use of wetlands.

Should you have any questions or require additional information please kindly inform us as soon as possible.

Yours sincerely,



Stephan Bezuidenhout
Environmental Compliance Consultancy
Email: stephan@eccenvironmental.com



Jessica Mooney
Environmental Compliance Consultancy
Email: jessica@eccenvironmental.com

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Appendix 2

Monday, 22 May 2017 at 3:38:38 PM West Africa Standard Time

Subject: Ramsar Site #742 - Wavlis Bay
Date: Wednesday, 1 February 2017 at 5:27:30 PM West Africa Summer Time
From: Jessica Mooney <jessica@eccenvironmental.com>
To: ramsar@ramsar.org <ramsar@ramsar.org>

Good Day,

I would like to introduce myself, I am an environmental consultant and our company (ECC) has been engaged to conduct an EIA for an upcoming project.

The project details are still being confirmed and the extent in which the project may impact a RAMSAR is still being determined.

As the project is in the initial phases we wanted to establish contact with you to liaise and to keep you informed of the project.

Can you please put me in contact with someone within the RAMSAR organisation whom I can discuss the way forward with?

Many thanks and kind regards,

Jessica

Please note our updated email address.

--

Jessica Mooney
Environment and Safety Consultant
Tel +264 81 653 1214 | Windhoek | Namibia
Email jessica@eccenvironmental.com



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Page 1 of 1

PO BOX 91193 Windhoek Namibia
Environmental Compliance Consultancy CC
CC/2013/11404

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NAMIBIA - 1NA001

1. Country: Namibia
2. Date: 24/7/95
3. Ref: 1NA001
4. Name and address of compiler:
Holger Kolberg
Ministry of Environment & Tourism
Private Bag 13306
Windhoek
Namibia
5. Name of wetlands: Walvis Bay Wetland
6. Date of Ramsar designation: 19 June 1995
7. Geographical coordinates: 23°00'S 14°27'E
8. General location: On the west coast, just south of Walvis Bay.
9. Area: 4000 ha
10. Wetland type: A1, A7, A10
11. Altitude: Sea level
12. Overview: The site consists of the natural areas of Walvis Bay lagoon, Pelican Point up to its extreme northern tip and the adjacent intertidal areas. It also includes the Walvis Bay saltworks and the area to the south of it.
13. Physical features: The underlying geology is of the Damara sequence covered by the Namib sand sea of Quaternary origin. The lagoon is in one of several old channels of the Kuiseb river; it is tidal in its entirety. The climate at the site is that typical of arid coasts. Annual precipitation ranges between 2 and 38mm.
14. Ecological features: The most important feature of the site is the mudflats exposed at low tide. There are several sandbars which serve as roosting sites. Very little natural vegetation occurs, but the town of Walvis Bay adjacent to the site is well vegetated.
15. Land tenure/ownership of:
(a) site: State land, town lands.
(b) surrounding area: State land
16. Conservation measures taken: The entire wetland and surrounding area have been proclaimed as a nature reserve.
17. Conservation measures proposed but not yet implemented: no information available
18. Current land use:
(a) site: Recreation, salt production.
(b) surroundings/catchment: no information available
19. Disturbances/threats, including changes in land use and major development projects:
(a) at the site: Residential development along the edge of the lagoon may have a slight effect on the bird populations. Natural siltation may eventually lead to the infilling of the site.
(b) in the surroundings/catchment: no information available

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20. Hydrological and physical values: no information available
21. Social and cultural values: no information available
22. Noteworthy fauna: Regular bird counts have shown that numbers of wetland birds vary from 37 000 to 79 000 individuals. Significant numbers of several red data species occur; about 6 900 chestnut-banded plovers *CHARADRIUS PALLIDUS*, 33 000 lesser flamingos *Phoeniconaias minor* and 23 000 greater flamingos *Phoenicopterus ruber*. Eleven red data species are regularly found.
23. Noteworthy flora: no information available
24. Current scientific research and facilities: Wetland bird counts are done twice a year.
25. Current conservation education: Several boards showing the diversity of birds in the lagoon have been erected.
26. Current recreation and tourism: The lagoon is used by windsurfers and dinghy sailors. There is a pedestrian walkway along the eastern shore of the lagoon. Many tour operators bring tourists to photograph the masses of flamingos.
27. Management authority: Ministry of Environment & Tourism, Private Bag 13306, Windhoek, Namibia.
28. Jurisdiction: As above.
29. Bibliographical references: See attached list.
30. Reasons for inclusion: 1b, 1d, 2a, 2c, 3a, 3c

Best regards,
Kenneth

From: OUEDRAOGO Paul [<mailto:OUEDRAOGO@ramsar.org>]
Sent: Wednesday, May 24, 2017 7:10 PM
To: jessica@eccenvironmental.com
Cc: kenneth uiseb <kenneth.uisieb@met.gov.na>; RAKOTOMAMONJY Rasamoelina <rakotomamonjy@ramsar.org>; AFRICA <africa@ramsar.org>
Subject: FW: Ramsar Site #742 - Wavlis Bay
Importance: High

Dear Madam Mooney,

We acknowledge good reception of your email dated on the 22nd May 2017 and the copy of the letter you received from the Ministry of Environment of Namibia related to the scope of EIA on Walvis Bay Ramsar site n°742.

Thank you for informing us on the matter.
We are currently busy preparing the Standing Committee of the Ramsar Convention (SC53) scheduled to be held next week (29 May-02 June 2017 in Gland, Switzerland).

So we will get back to you after this meeting.

Kindest regards,

Paul.



Paul Ouédraogo
Senior Regional Advisor for Africa
Ramsar Convention Secretariat
28 rue Mauverney, CH-1196 Gland (Switzerland)
Tel. +41 22 999 0164; fax +41 22 999 0169
www.ramsar.org Join us: www.facebook.com/RamsarConventionOnWetlands

From: Jessica Mooney [<mailto:jessica@eccenvironmental.com>]
Sent: 22 May 2017 16:54
To: Ramsar Mailbox
Cc: 'Stephan Bezuidenhout'
Subject: Re: Ramsar Site #742 - Wavlis Bay
Importance: High

Dear Sir or Madam,

I am writing regarding RAMSAR Site 742 in Namibia. Kindly find attached letter for your information and reference.

We look forward to hearing from you.

Kind regards,

Jessica

Monday, January 15, 2018 at 11:55:09 AM Central Africa Time

Subject: Re: Ramsar Site #742 - Wavlis Bay
Date: Monday, 29 May 2017 at 10:25:16 am West Africa Standard Time
From: Jessica Mooney <jessica@eccenvironmental.com>
To: kenneth uiseb <kenneth.uiseb@met.gov.na>
CC: RAKOTOMAMONJY Rasamoelina <rakotomamonjy@ramsar.org>, AFRICA <africa@ramsar.org>, OUEDRAOGO Paul <OUEDRAOGO@ramsar.org>, Holger Kolberg <holgerk@afol.com.na>
Attachments: image001.jpg, image002.jpg, 6D0B9E92-E79A-42A9-9B61-7A2E5A6812B4[65].jpg

Good Morning Kenneth,

I trust you are well.

I am meeting with Holger today at 14:30pm at his office to give an update on the project, if you are available it would be great if you could join us.

Kind regards,

Jessica

Please note our updated email address.

--

Jessica Mooney
Environment and Safety Consultant
Tel +264 81 653 1214 | Windhoek | Namibia
Email jessica@eccenvironmental.com



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From: kenneth uiseb <kenneth.uiseb@met.gov.na>
Date: Friday, 26 May 2017 at 9:17 AM
To: Jessica Mooney <jessica@eccenvironmental.com>
Cc: RAKOTOMAMONJY Rasamoelina <rakotomamonjy@ramsar.org>, AFRICA <africa@ramsar.org>, OUEDRAOGO Paul <OUEDRAOGO@ramsar.org>, Holger Kolberg <holgerk@afol.com.na>
Subject: RE: Ramsar Site #742 - Wavlis Bay

Dear Jessica,

I am writing to you in connection with the above-mentioned EIA for the Waterfront Development at Walvis Bay Ramsar Site. Could you please provide me with an update on the progress of the EIA?

Alternatively, please contact me for us to discuss the EIA further.

Page 1 of 4

15. COMPETENT AUTHORITY CLARIFICATION

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Ref ECC-41-54-LET-05-A
10th May 2017

Ministry of Environment and Tourism
Department of Environmental Affairs
Private Bag 13306
Windhoek
Namibia

FOR ATTENTION: ENVIRONMENTAL COMMISSIONER (MR. TEOFILUS NGHITILA)

Dear Mr Teofilus Nghitila,

RE: COMPETENT AUTHORITIES FOR WALVIS BAY WATERFRONT PROJECT, WALVIS BAY, ERONGO REGION.

Environmental Compliance Consultancy [ECC] has been engaged by our client Walvis Bay Waterfront Development Pty Ltd to undertake the Environmental Impact Assessment for the proposed Walvis Bay Waterfront development.

ECC has commenced with the EIA as per the project scope for the assessment received by your office on the 27th October 2016 (attached).

In accordance with section 30, 31 and 32 of the Environmental Management Act 2007 and section 6 of the regulations the application for environmental clearance must be made to the relevant competent authority then forwarded to the Environmental Commissioner for assessment. In accordance with the Act and the regulations pertaining to competent Authorities ECC has identified the following to be the competent authorities:

- 1 – Ministry of Environment and Tourism – Regulating Authority of the RAMSAR site as per attached
- And
- 2 – Walvis Bay Municipality

Public consultation will be conducted in accordance with the Act and ECC will continue to liaise with relevant and key stakeholders such as neighboring property owners, NGOs, local experts and government bodies such as the Ministry of Fisheries and Marine Resources.

ECC hereby requests written confirmation from the DEA if the competent authorities listed above fulfill the requirements of the Act, regulations and public notice issued by your office? To ensure ECC remains within our project timeline we kindly request the written confirmation to be forwarded to the email addresses below no later than the 17th May 2017.

Yours sincerely,

Stephan Bezuidenhout
Environmental Compliance Consultancy
Email: stephan@eccenvironmental.com

Jessica Mooney
Environmental Compliance Consultancy
Email: jessica@eccenvironmental.com



REPUBLIC OF NAMIBIA

MINISTRY OF ENVIRONMENT AND TOURISM

Tel: (00 26461) 284 2111
Fax: (00 26461) 229 936

Cnr Robert Mugabe &
Dr Kenneth Kaunda Street
Private Bag 13306
Windhoek
Namibia
16 May 2017

Enquiries: Mr. Ipeinge Mundjulu
E-mail: Ipeinge.mundjulu@mct.gov.na

OFFICE OF THE ENVIRONMENTAL COMMISSIONER

The Managing Director
Environmental Compliance Consultancy
P O Box 91193
Windhoek
Namibia

Dear Sir/Madam

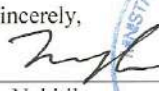
**SUBJECT: COMPETENT AUTHORITIES FOR WALVIS BAY WATERFRONT PROJECT,
WALVIS BAY, ERONGO REGION.**

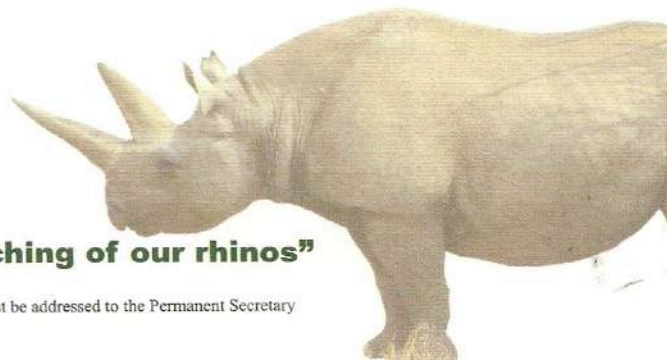
The above subject bears reference.

The Environmental Management Act, 2007 (Act No. 7 of 2007) makes provision under section 32. (1) that a person who is required to obtain an environmental clearance certificate must apply to the relevant competent authority for environmental clearance certificate in respect of the listed activity to be undertaken. Procedures for identifying the competent authority are further stated in the act, under section 30 subsection (1) (2) and (3). With regard to your request, the Ministry of Environment and Tourism is a competent authority but NOT Walvis Bay Municipality.

You are strongly advised to consider Walvis Bay Town Council bylaws and to consult comprehensively with all relevant stakeholders.

Yours sincerely,


Teofilus Nghitila
ENVIRONMENTAL COMMISSIONER



“Stop the poaching of our rhinos”

All official correspondence must be addressed to the Permanent Secretary

16. BACKGROUND INFORMATION DOCUMENT

PROPOSED WALVIS BAY WATERFRONT DEVELOPMENT, NAMIBIA

ENVIRONMENTAL IMPACT ASSESSMENT (EIA) - JUNE 2017

CLIENT: WALVIS BAY WATERFRONT DEVELOPMENT PTY LTD

BACKGROUND INFORMATION DOCUMENT



ENVIRONMENTAL
COMPLIANCE CONSULTANCY

PURPOSE OF THIS DOCUMENT

The purpose of this Background Information Document (BID) is to provide interested and affected parties (I&APS) with a background to the proposed Walvis Bay Waterfront and invite I&APS to register in the Environmental Impact Assessment (EIA) process. Through registering, the I&APS will be kept informed throughout the EIA and a pathway provided to submit comments pertaining to the project.

This BID includes the following:

- Introduction
- How the EIA process works
- Public participation process and how to become involved
- What is proposed and where
- Why the project is needed and what benefits or impacts are anticipated
- Alternatives being considered
- Next steps and way forward

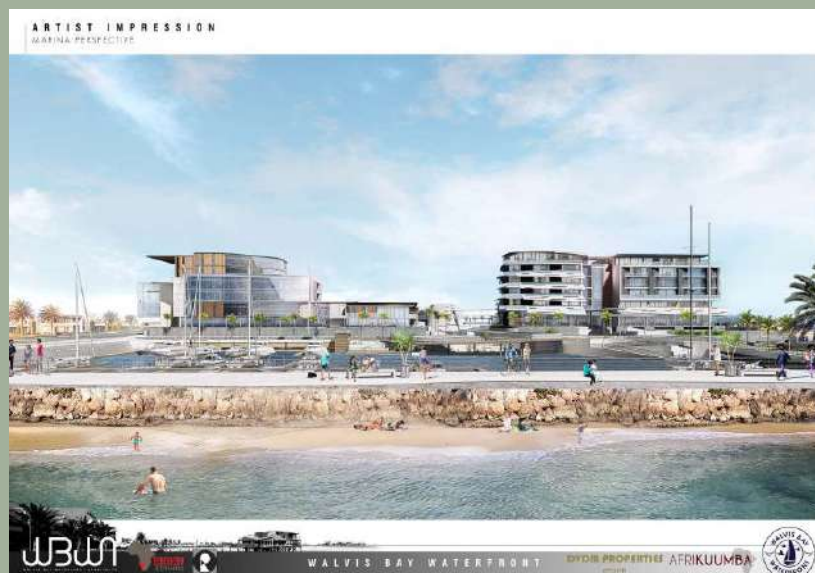
Project Introduction

Environmental Compliance Consultancy [ECC] has been engaged by Walvis Bay Waterfront Development Pty Ltd to undertake the Environmental Impact Assessment (EIA) for the proposed Walvis Bay Waterfront development.

Walvis Bay Waterfront Development Pty Ltd intends to develop land portions 4941 and 4939 in accordance with the councils Integrated Urban Strategic Development Framework (IUSDF). The project includes developing a marina for the proposed Waterfront.

The proposed plans incorporate residential, public open space, retail and various other activities in a waterfront development in Walvis Bay, Namibia.

The proposed project triggers listed activities in accordance with the Environmental Management Act 2007. An application for Environmental Clearance will be submitted in the form of an Environmental Impact Assessment to the relevant competent authorities and Ministry of Environment and Tourism in accordance with the Act.



Proposed Waterfront Concept Images



SITE INFORMATION:

TOTAL SITE AREA (PHASE 1 & 2)	14,104 m ²
PHASE 1 AREA	5,346 m ²
PHASE 2 AREA	8,758 m ²
WATERWAY	2,197 m ²
ROADS	1,126 m ²
LANDSCAPE	17,236 m ²
PHASE 1 (TOTAL)	8.8
PHASE 2 (TOTAL)	8.8
TOTAL (PHASE 1 & 2)	1.5
RECOMMENDED BULK FLOWABLE	1.5

PHASE A - CALCULATION:

PHASE 1	1,104 m ²
PHASE 2	1,384 m ²
RECOMMENDED BULK FLOWABLE	1,888 m ²
RECOMMENDED BULK FLOWABLE	1,888 m ²

PHASE B - CALCULATION:

PHASE 1	1,104 m ²
PHASE 2	1,384 m ²
RECOMMENDED BULK FLOWABLE	1,888 m ²
RECOMMENDED BULK FLOWABLE	1,888 m ²



DYDM PROPERTIES AFRIKUUMBA
(PVT) LTD

WALVIS BAY WATERFRONT



Figure 1 – Proposed layout for Walvis Bay Waterfront

Project Introduction - Continued

The land site is currently zoned as Private Open Space. The site is characterized by public open space with municipal facilities including swimming pool, cricket field, tennis and jukskei courts.

The proposed site faces the Walvis Bay Lagoon, a RAMSAR listed wetland with the marina portion of the project located near the Raft restaurant on the edge of the mouth of the Walvis Bay lagoon. The proposed land site is heavily disturbed by urban development while the marina portion extends between 30-50m into the lagoon to connect with the Raft restaurant.

The development is not large, relative to other on-going construction in the Walvis Bay environs, but it may impact on the mouth leading into the lagoon. The area being considered for development is neither pristine nor undeveloped. Although the Walvis Bay lagoon and wetlands have been declared a RAMSAR site and area of global environmental significance, there are numerous commercial enterprises in and around the wetlands, including salt pans and a salt works, an upmarket hotel at Pelican Point near the entrance to the lagoon.

Namibia became a signatory to the Ramsar Convention in 1995 and has registered 4 sites of International Importance: Walvis Bay; Sandwich Harbour; Etosha Pan and the Cuvelai Drainage; and the Orange River mouth (jointly with South Africa). The mission of the Ramsar Convention is "the conservation and wise use of all wetlands through local and national actions and international cooperation, as a contribution towards achieving sustainable development throughout the world".

The area holds significant social importance to members of the Walvis Bay community. The area is used by a broad spectrum of community members and associations for sporting and recreational activities. The proposed project will include the relocation of such facilities and will disturb the existing social elements associated with these facilities while the facilities are relocated. The developer in conjunction with the municipality and the community expectations will relocate the sporting facilities offering a new and generally higher standard of facility than currently exists.

Need for the Walvis Bay Waterfront

Walvis Bay is Namibia's largest harbour and port with passenger amenities, cargo loading quays, storage and transport services, dry-dock facilities, and commercial fish processing factories. The lagoon is used for commercial mariculture farms and also for tourism and recreational activities such as wind- and kite-surfing and kayaking. Marine tours take visitors into the lagoon and out to Pelican Point to view seals and dolphins close up. Recreational fishing spots are found on the sandspit at the seaward end of the wetlands, within the lagoon and around the northern shores of the bay.

The wetlands are popular with birdwatchers, as they host vast populations of resident and migratory birds of a variety of species. The esplanade along the eastern shore of the lagoon affords visitors and locals the opportunity to view flamingos, pelicans, waders and other coastal birds from close range.

The proposed Walvis Bay Waterfront will bring a new and improved dimension to Walvis Bay offering a secure and safe place of anchorage for small recreational and commercial boats/yachts. The waterfront will bring social cohesions offering access to the marine waterfront, new opportunities for existing and new businesses with increased patronage to the area. The waterfront will lend itself to free flowing pedestrian access linking into existing walkways to allow tourists and pedestrian access to flow freely. The Waterfront will become a place for local residents and tourist alike to enjoy, offering restaurants, shopping, retail, housing and offices to the Walvis Bay community. With such a development there will be economic benefits and up-liftment of the area for the town, jobs will be created through construction and long term through retail and business that will operate from the Waterfront.

Applicant – Walvis Bay Waterfront Development Pty Ltd
Environmental Assessment Practitioner – Environmental Compliance Consultancy (ECC)
Competent Authority – Ministry of Environment and Tourism (MET)



What is Proposed?

The proposed Waterfront development will include several types of infrastructure and land use within the proposed site. Preliminary designs for the proposed development include the following:

- Medium Density residential areas
- High Density residential areas
- Public Open Space
- Business Offices
- Hotel
- Service Yard and Parking Areas
- Conference Centre
- Internal Access Roads
- Marina
- Restaurants

The above-proposed activities are illustrated in the preliminary design for the development.



Site location

The site is located in the Walvis Bay Municipality of the Erongo Region, Namibia. The proposed Waterfront is situated on the land portions 4941 and 4939. The site has the following Municipal facilities that will be relocated as part of the project:

- Swimming Pool and ablution/supporting services
- Tennis Courts
- and -small clubhouse
- Cricket clubhouse (phase 1)
- Cricket field (phase 2)
- Jukskei courts

The project will be completed in two phases:

- Phase 1A & 1B – 3.4ha
- Phase 2 – 2.5ha

RELOCATION OF SPORTS FACILITIES



The City Council is investigating and trying their best to find an appropriate site for the cricket field accompanied by practice nets and a clubhouse. The cricket has been submitted to the Municipal Council.

- One team to be kept at the site from Swakopmund on the right-hand side (this area is to be used for housing etc.)
- A site of the Municipal Council, where there are necessary to support the development in the summer by fully utilizing the water tanks built for practice and storage for parking area for big events at the stadium.

PROPOSED INDOOR SWIMMING POOL

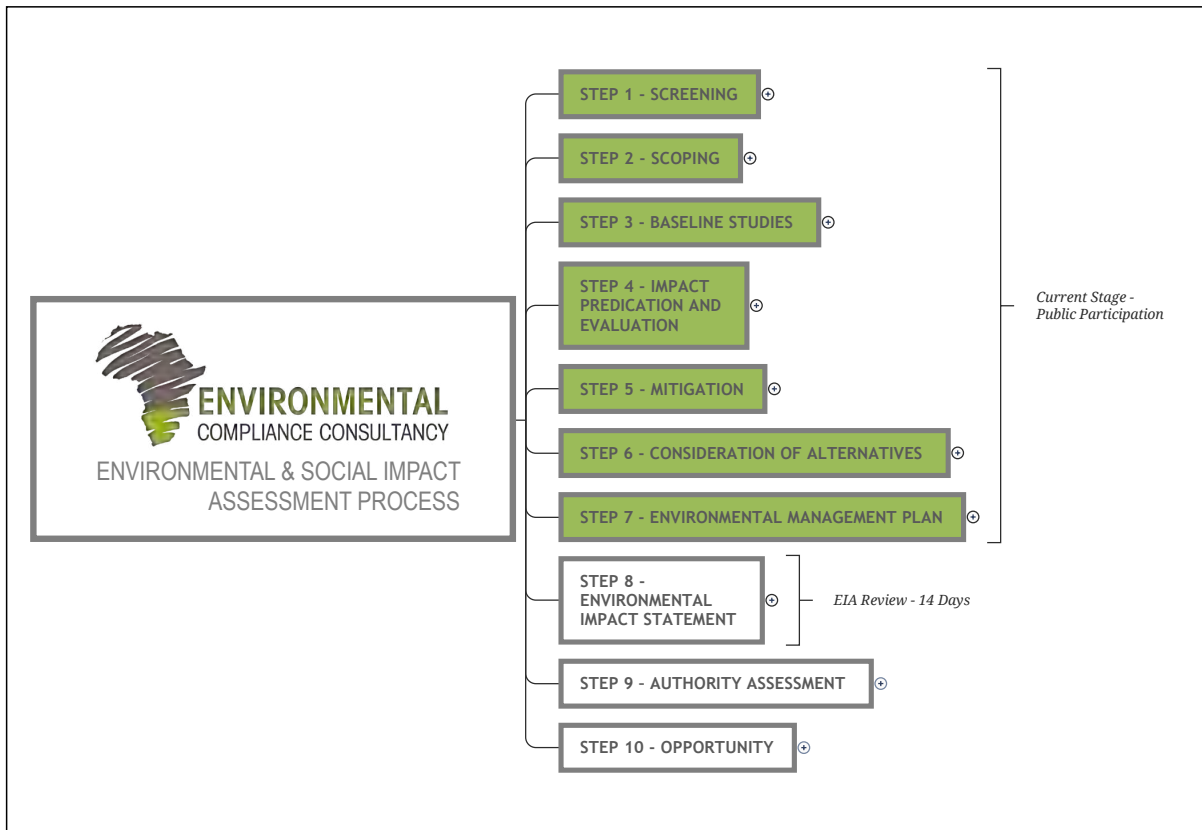


THE EIA PROCESS

The Environmental Impact Assessment process followed is in accordance with Environmental Management Act 2007. The environmental practitioner is required to conduct the environmental application process and manage the public participation process. According to the EIA process flowchart below, this project is currently at the Scoping phase and the public participation process is being conducted. ECC will perform the following:

- Identify key stakeholders, authorities and municipalities, environmental groups and interested or affected members of the public, hereafter referred to as IAPs.
- Give written notice to the owners and occupiers of land adjacent to the site
- Compile a Background Information Document (BID) for the proposed development,
- Advertise the environmental application in two newspapers, namely: 'The Namibian' and 'The Informate' in addition ECC has advertised in the Namib Times;
- Place on-site notices at conspicuous places at/ near the proposed development boundary;
- Obtain landowner's consent, where required (in this instance the applicant is the landowner);
- Host a Public meeting to encourage stakeholder participation and engagement, and provide details of issues identified by the EAP, stakeholders and IAPs;
- Record all comments of IAPs and present such comments, as well as responses provided by ECC, in a full Comments and Responses Report, which will be included in the Scoping Report that is submitted to MET;
- Circulate all IAP comments to the project team;

The commenting period for all IAPs will be 14 days from notification. The Draft Scoping Report (DSR) will be made available to all relevant stakeholders and IAPs for further comment, before the final scoping is submitted to MET and the Competent Authority. The following process flowchart illustrates the environmental process to be followed during the EIA for the proposed project.



Scope of Work

The scope of work for the EIA is based on the scope of work provided by the MET and includes but not limited to assessment of:

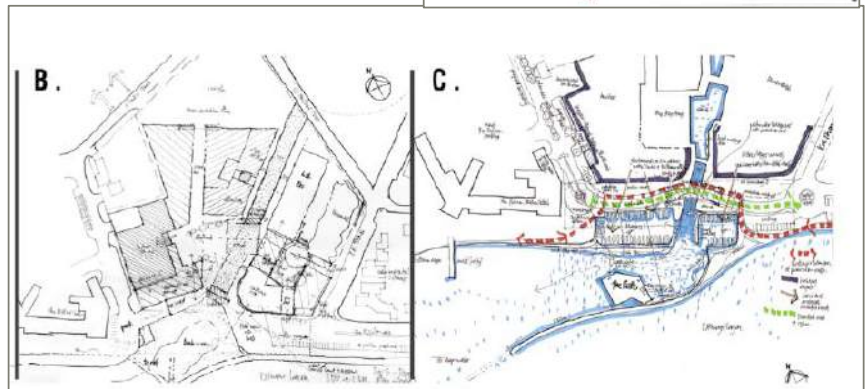
- Impacts of construction of channel and other structures below the high water mark on the water quality of the lagoon;
- Risks of Marine pollution from boats
- Impacts of boats navigation to and from the proposed Marinas, taking into consideration of tidal variations in the lagoon;
- A hydrodynamic modelling study needs to be completed for the channel and structures to see how these may affect the circulation in the lagoon and then assess the potential associated impacts
- Appropriate maintenance plan for channel (dredging) and its impacts
- Strategies for waste management
- Impact of lights on the birds in the lagoon and alternatives
- Any other impacts that may be found to be associated with the proposed project

What alternatives are being considered?

Many alternatives are being considered for the project these include:

- Design alternatives for example breakwater wall design
- Marina design and position to prevent sedimentation
- Building design and positioning
- Sporting facilities relocation and options
- Traffic routing and alternatives

One key component for consideration in the undertaking of this environmental impact assessment is the process of conducting a project alternatives assessment. The alternative assessment will look at options in project siting, technologies and land uses and will be included in the EIA.



Design Development - Sketch Plans



Design Development - Stage 05



Design Development - Stage 08



Moving Forward...

Public Participation

HOW TO GET INVOLVED?

Public participation is an important part of the EIA process, as it allows public to obtain information about the proposed project.

Public participation occurs at various stages throughout a project lifecycle including:

- Advertising in newspapers
- Distributing this BID to identified stakeholders
- Providing access to draft scoping reports
- Registered I&APS will also be informed of the availability of the draft scoping report for a 14 day comment period, during which the period the public will have the opportunity to review the draft document and raise any issues of concerns
- Advertising the decision received from MET and affording an opportunity to I&APS to appeal the decision

At ECC we make sure all information is easily accessible to the public, follow our social media pages to be kept up to date.



https://www.facebook.com/environmentalECC/?ref=br_rs



<https://twitter.com/ECCEnvironment>



<http://eccenvironmental.com/projects/>



**+264 81 262 7872 OR
+264 81 653 1214**

I&APS Next Steps

1. Register as I&AP on our website.
 - <http://eccenvironmental.com/projects/>
2. Follow ECC on Facebook and social media to keep up to date
3. Comments must be submitted in writing and can be emailed to the following address:
 - info@eccenvironmental.com
 - Tel: +264 81 626 7278
 - Please note the EIA review period will be 14 days from the date that I&AP have been notified.

Contact Us:

Environmental Compliance Consultancy Contact Details

We welcome any enquiries regarding this document and its content, please contact:

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www.eccenvironmental.com

17. REGISTERED POST



ENVIRONMENTAL COMPLIANCE CONSULTANCY

RED ITEMS POSTED



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PO Box 91193 • Windhoek • Namibia
Registration Number CC/2012/11494

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jmo@eccenvironmental.com
www.eccenvironmental.com

Reference no.	Addressee's name and address	Registration no.
	CASPARUS GROBLER (EFT 51) PO BOX 2374 WALVIS BAY	RR 002636894 NA
	C. VON DER FECHT (EFT 52) PO BOX 2343 WALVIS BAY	RR 002636903 NA
	J. BOLAT TRUST (EFT 50) PO BOX 224 WALVIS BAY	RR 002636917 NA
	GLOWE H.C. (EFT 1273) PO BOX 3457 WALVIS BAY	RR 002636925 NA
	SIEGEBIRD STEIN (EFT 45) PO BOX 447 WALVIS BAY	RR 002636934 NA
	ARLIN BODY CORP (EFT 37) PO BOX 2340 WALVIS BAY	RR 002636948 NA
	ALBERT'S COURTYARD HOTEL PO BOX 3493 WALVIS BAY	RR 002636951 NA
	CASPARUS GROBLER (EFT 235) PO BOX 2374 WALVIS BAY	RR 002636965 NA
	J.P. VAN ZYL (EFT 48) PO BOX 1787 WALVIS BAY	RR 002636979 NA
	THE MANIE FAMILY TRUST (EFT) PO BOX 1657 WALVIS BAY	RR 002636982 NA
	AQUARIS INVESTMENTS (EFT) PO BOX 1639 WALVIS BAY	RR 002636996 NA
	AQUARIS INVESTMENTS (EFT) PO BOX 1639 WALVIS BAY	RR 002637002 NA
	FRANK HARTMUT (EFT 1294) PO BOX 57348 WINDHOEK	RR 002637016 NA

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Date-stamp

Number of items 13 Received by [Signature]













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by Environmental Compliance Consultancy

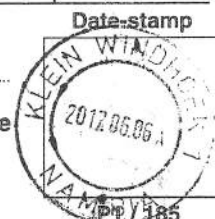
Sender's reference no.	Addressee's name and address	Registration no.
	SEIZE THE MOMENT INVESTMENTS PO BOX 2929 WINDHOEK	 RR 002636775 NA
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	DOLPHIN CRUISERS (EFT 15) PO BOX 2176 NALVIS BAY	 RR 002636792 NA
	DAGMAR GUDRUN (EFT 1232) PO BOX 1101 SWAKOPMUND	 RR 002636801 NA
	UH SCHAFER (EFT 2989) PO BOX 674 NALVIS BAY	 RR 002636815 NA
	CLEVELAND INVESTMENTS (EFT 10) PO BOX 983 NALVIS BAY	 RR 002636829 NA
	ML HEARN (EFT 10) PO BOX 1643 NALVIS BAY	 RR 002636832 NA
	FUTUREKID CONST CC (EFT 12) PO BOX 3575 NALVIS BAY	 RR 002636846 NA
	NAMIBIAN FISHING CONSULTANTS (EFT 10) PO BOX 9603 WINDHOEK	 RR 002636850 NA
	MR SR VAN NYK (EFT 16) PO BOX 1639 NALVIS BAY	 RR 002636863 NA
	FRANK HARTMUT (EFT 1259) PO BOX 87348 WINDHOEK	 RR 002636877 NA
	SEIZE THE MOMENT INVESTMENT PO BOX 2929 WINDHOEK	 RR 002636885 NA
	SEIZE THE MOMENT INVESTMENTS (EFT 19) PO BOX 2929 WINDHOEK	

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	NICHEL PROPERTIES (EFT 40) PO BOX 206787 WALVIS BAY	 RR 002637033 NA
	AGT TRADING NAMIBIA (EFT 3) PO BOX 997 WALVIS BAY	 RR 002637047 NA
	MISTY BAY INVESTMENTS (EFT 3) PO BOX 5604 WALVIS BAY	 RR 002637055 NA
	MR A C BESSINGER (EFT 3) PO BOX 383 WALVIS BAY	 RR 002637064 NA
	HEOWIG MANDEAN (EFT 32) PO BOX 1832 WALVIS BAY	 RR 002637078 NA
	FIRST PROP HOLDINGS (EFT 35) PO BOX 438 OTJJO	 RR 002637081 NA
	S C OITTMER (EFT 36) PO BOX 4052 WALVIS BAY	 RR 002637095 NA
	GENEFORMEERDE KERK (EFT 3) PO BOX 776 WALVIS BAY	 RR 002637104 NA
	J H POTGIETER (EFT 33) PO BOX 2776 WALVIS BAY	 RR 002637118 NA
	J H POTGIETER (EFT 28) PO BOX 2776 WALVIS BAY	 RR 002637121 NA
	MG SCHMIDT (EFT 21) PO BOX 1049 WALVIS BAY	 RR 002637135 NA
	GERDA DRONJA (EFT 21) PO BOX 1019 WALVIS BAY	 RR 002637149 NA

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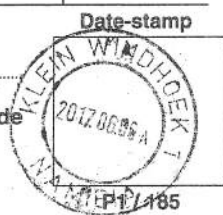
by

Sender's reference no.	Addressee's name and address	Registration no.
	PROKON EOMS (EFT 22) PO BOX 1705 WALVIS BAY	 RR 002637152 NA
	K JUSTINUSSEN (EFT 26) PO BOX 2452 WALVIS BAY	 RR 002637166 NA
	PLAN B CONSULTANCY (EFT 27) PO BOX 458 WALVIS BAY	 RR 002637170 NA
	J VAN SCHALKWYK (EFT 23) PO BOX 1705 WALVIS BAY	 RR 002637183 NA
	EFT 20 NB CC (EFT 20) PO BOX 553 WALVIS BAY	 RR 002637197 NA
	NC VENTER (EFT 2332) PO BOX 2663 WALVIS BAY	 RR 002637206 NA
	NAMPORT (EFT 1304) PO BOX 361 WALVIS BAY	 RR 002637210 NA
	NAMUNOJERO VENTER (EFT 4) PO BOX 40194 WALVIS BAY	 RR 002637223 NA
	DOLPHIN CRUISERS (EFT 462) PO BOX 2176 WALVIS BAY	 RR 002637237 NA
	N DREYER (EFT 4940) PO BOX 2176 WALVIS BAY	 RR 002637245 NA

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18. ADDITIONAL WRITTEN RESPONSES FROM I&APS

This section includes additional formal responses that were submitted as additional information to the online form and comments contained in the ESIA report table 39.

18.1. THE RAFT

The notes presented below from the Raft were not published in the ESIA document because ECC respected the Raft Owners wishes not to publish them in the draft report. The comments and feedback from the Raft were used in undertaking the assessment and were considered by ECC during the whole assessment. Upon further request ECC obtain permission from the Raft to publish the comments and therefore have been presented below.

Areas of concern for the future of The Raft
if the proposed waterfront development were to be approved

We acknowledge that if the project were to be completed, as per the current proposed plans, then The Raft would ultimately benefit from increased revenue and in the big picture it would be a fantastic thing for Walvis Bay as a whole and is part of the natural process of progress and expansion which is inevitable in a growing town.

However, the length of time it will take from the start, to the completion of the project to a point where there are pretty yachts floating in the marina enticing people to come to The Raft, will take so long that the consequential loss of revenue the The Raft would suffer in the meantime, would essentially kill off the business in the process and there would be nothing left at the end.

Major concerns regarding Loss of revenue

- Noise pollution from a major construction site e.g. cranes, lorries offloading amongst other things rubble, sand, iron girders etc. will deter tour companies from bringing tourists for a 'peaceful' lunch to watch the dolphins and myriad birdlife.
- Tour companies will cease to bring tourists to the Raft to photograph the Flamingos in front of the Raft because there won't be any, there will be a marina.
- Local people will be put off by difficult access and remote parking; both during the construction phase and to some degree even on completion (the walkway to The Raft will be twice as long and will be even more exposed to the wind than the existing walkway.)
- While it could be said that additional local people may be enticed to visit the site to view progress on construction, most of that would take place on Sunday's, which is the one day of the week when we close (to comply with conditions stipulated in the Labour Act). To open on a Sunday we would need to employ more staff which would negate any potential benefit.
- From the start of the project through to completion there will be regular interruptions to all essential services, rendering operations impossible at times.
It is an indisputable fact that the construction site lies directly between The Raft and its;
Water supply
Electric supply
Link to the sewage system

Major concerns regarding additional costs that would be incurred and investment that would be required;

- The new 'route' for sewage would need to have some kind of substantial pumped system due to; the fall, distance and 'corners' involved. Who would be responsible for paying for the initial provision and installation as well as the ongoing maintenance of such a system?
- A complete exterior makeover of The Raft would be required to compliment the new surroundings so that The Raft does not look like a broken, rundown, neglected poor relation when compared to the brand new swanky environment that would surround us. Currently the rustic appearance is part of the charm of Walvis Bay; The Municipality features 3 photos of The Raft on their website and for a long time had one on its home page.
- Extensive construction work, that will be required around the base of The Raft for the construction of the new sea wall, could potentially cause problems with the stability of the current piles on which The Raft stands and certainly additional strengthening would be required.
- Re-branding would be required as the appearance of The Raft from the land will change drastically and the library of beautiful photos that has been built up over the past 15 years and used for publicity and advertising would be essentially useless as they would not portray an up to date image and could thereby bring problems of misrepresentation.
 - Sunset photos from east with The Raft in silhouette
 - Photos from jetty
 - Flamingos in front of and around The Raft
 - Dolphins around Raft

Our current brand image which has been built up over 15 years will be completely nullified and there will be no alternative to offer until the project is completed.

- Retrenchments would be inevitable as business declined.
- Over the past 12 years we have trained up staff to a high standard, to start all over again building a successful team would incur considerable additional money and valuable time.

Other major concerns

- The long term sustainability of the business with regards to the renewable lease on the land (seabed) and the concern that the developer may, at the time of renewal, present

'competition' and attempt to procure the lease on the land (seabed) by being in a position to offer the lessor a higher rent.

- Having been in the hospitality business for 12 years now on a fulltime basis, we were planning to sell the business at some stage during the next couple of years.
With the future of The Raft now in jeopardy, it will be impossible for us to convince any potential buyer of the potential value as there is no guarantee over how long the project will take or even worse no guarantee as to whether it will ever be completed.
- Staff morale will be hit by the uncertain future of The Raft and as a result we would risk losing staff members in whom we have invested time and money over the past 12 years and who have been loyal to us and hard working.

18.2. MR YATES

Comments on Proposed Walvis Bay Waterfront

Marine Mammals

- There are several other species of cetaceans that have been spotted around the bay area (including some rare species), this includes:
 - Southern Right Whales
 - Pygmy Right Whales
 - Dwarf and Pygmy Sperm Whales
- It was mentioned that whales do not enter the bay itself – this is not the case. I have personally seen several whales enter the bay
- Pile driving
 - Need to look at data from NDP
 - Not only does it have potential impacts on marine mammals but it also may affect the fish distribution, abundance or biodiversity in the lagoon – this is important as it they are prey for larger marine organisms
 - The lagoon is a regular feeding area for bottlenose dolphins
- Noise
 - Frequencies affect marine cetaceans and fish (fish it affects their central line and swim bladder)
 - Marine mammals may have the ability to forage elsewhere but the same cannot be said for fish
- Dolphins attracted to areas of dredging? If this is the case it will increase the chances of strandings in the dredged areas (when there is ebb tide, especially during neap tide)
- Regarding the marine traffic it was proposed that the vessels maintain 100 m distance from cetaceans, however, this is not maintained with tourist boats, how is this going to be controlled with construction vessels? Regulations have been proposed (by MET) but have not yet been legally implemented, without implementation can have long-term impacts

Turbidity

- Dolphins will not be affected by increased turbidity of water but their sonar will be impacted by noise infractions -fish will be affected by increased turbidity which can then impact the dolphins as the prey will go elsewhere
- The propose marina for the waterfront will continuously need to be dredged due to the siltation of the lagoon – thus not limited to short term impacts
- There has been no mention of smaller organisms in the lagoon that will be affected by the dredging process (supposed to have been a study done by UNAM students but has not begun)
- These smaller organisms – phytoplankton and zooplankton are essential for the health of the entire ecosystem in the lagoon area

Pollution

- Quick response for the clean-up procedures for oil and chemical spills was also proposed for the expansion of the port, however, I have observed diesel spills in the lagoon and several time in the shipping lanes of the harbour – reported it and then little or nothing is done about it
- The pollution that comes with increased interaction between human activity and the marine environment will not only impact seals and turtles, it will impact all species that reside in the lagoon area (dolphins, sharks, fish, zooplankton, birds etc.)
- Entanglement is not the only impact of plastic pollution but also ingestion
- Ingestion of plastic and microplastics become embedded in the tissue of shellfish and ingested by fish
- It was mentioned that the reduction in pollution in the area will be to educate people – who will do this?
- Consensus of no motorised boats in lagoon, however, what vessels will be allowed into the proposed marina?

Climate Change

- Sea level rise was not mentioned – yes it was taken into account by the engineering firms but this needs to be mentioned in the EIA
- Storm surges is another issue that needs to be mentioned in the EIA, if land is reclaimed here – it is likely to affect the circulation in the lagoon
- The prevailing wind is from the southwest

Tides

- The tides will impact the marina
- It was mentioned that dolphins may be attracted to dredged areas, thus the proposed inlet/channels for the site will attract the dolphins. When it is low tide this will create more opportunity for strandings and interaction with boats

Sharks and other species

- There are sand sharks and bronze whalers in the lagoon
- Phytoplankton
- Zooplankton
- Benthic fauna and flora

Birds

- Ramsar site – see references for case studies
- Decline in waders and already seen impact from port expansion
- Declines related to siltation of lagoon
- Tall buildings on the water front will have no impact on the flight patterns of pelicans, flamingos and cormorants?
- Tourist from all over the world come to see the birds in the lagoon and with declining numbers due to development will in turn decrease tourism

Dredging and current circulation

- Siltation of the lagoon is currently happening so the area that needs to be dredged for the marina section will likely need to be dredged on a regular basis – this means that the dredging section is not short term – but will continue during the life time of the proposed project
- Increased sulphur eruptions
- Impact on area as a carbon sink (remote sensing data) and affect the ecosystem services that the lagoon provides

“Green” building

- The project was proposed in 2003, thus in no way is this project contributing to trying to reduce CO² emissions or trying to become ‘green’ as Namibia has signed the Paris agreement
- Sustainable development?
- Environmentally responsible and resource-efficient: from planning to design, construction, operations, maintenance

Other

- How will the funds from this development be distributed to places like Kuisebmond?
- Cannot compare to Cape Town waterfront; the Cape Town waterfront is on the open ocean and deeper and not in an ecologically important area
- The effects of siltation would lead to increased salinity of the area (decreased volume of water and current and increasing evaporation rates – leads to increased salinity)
- Siltation also means that temperature of the water in the lagoon will change due to decreased volume and heating of surface water
- Barriers to fish movement
- Ecosystem services that the lagoon provides

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18.1. I&AP COMMENTS

Date Registered	Title	Surname	Organisation and/or property description (if landowner/lawful occupier)	Stakeholder Group	Aspect	Please describe the nature of your interest in this project / Do you have any specific concerns associated with the Project (for example: water, soil, pollution, Cultural or historical)?	Area addressed
24.5.2017	Mr	Dreyer	Home-owner in Atlantic Street Land-owner corner of Atlantic Street / Esplanade	Member of Affected Community	Residential	I currently own property adjacent to the proposed project. I am a long-time resident and home-owner in this area.	Sections 8.1.4 and 8.5 provides the assessment findings of the potential impacts on local residents and community.
					Town Planning	General concerns – no communication for a long time. How this development will affect the current Walvis Bay Waterfront on Nampont ground.	Chapter 4 provides the project overview setting out land use, development area. Section 8. 4 provides the assessment findings of the potential impacts on local businesses.
					Traffic	Traffic increase in residential area with subsequent noise pollution	Assessment findings of the potential impacts as a result of traffic is presented in section 8.5.
24.5.2017	Mr	Dreyer	Pelican Point Kayaking – Office at current Walvis Bay Waterfront	Member of Affected Community	Town Planning	My offices are situated in the current Waterfront area, and we are still totally in the dark as to what will happen with our area. We need to know that provision will be made for all current Waterfront tenants in the New Waterfront Development	Chapter 4 provides the project overview setting out land use, development area. Section 8. 4 provides the assessment findings of the potential impacts on local businesses.
					Lagoon Siltation	If there is going to be a marina built, it is a major concern that it will contribute to the rapid silting up of the Walvis Bay Lagoon	Sections 8.6, 8.7 and 8.8 provide the findings of the assessment of the Marine Environment.
24.5.2017	Mrs	Dreyer	Jettishoppe owner at the current Walvis Bay Waterfront.	Member of Affected Community	Business impacts	My business is located at the current Waterfront. Any change to the existing Waterfront will affect my staff and my shop in many ways.	Chapter 4 provides the project overview setting out land use, development area. Section 8. 4 provides the assessment findings of the potential impacts on local businesses.
					Business impacts	The current waterfront is a naturally grown tourist hotspot and strongly supported by local visitors. Any change to the rustic built will destroy the atmosphere and charm. We are worried the sheer size of the proposed new waterfront is too large for existing needs in a small harbour town like Walvis Bay. Current small businesses like mine will be pushed out of the market by big international chains. Family run enterprises will not be able to compete with big corporation and will struggle to afford the high rent that comes with new fancy developments.	Section 1.3 presents the philosophy of the proposed project. Chapter 4 provides the project overview setting out land use, development area. Section 8. 4 provides the assessment findings of the potential impacts on local businesses.
					Informal vendors	The current Waterfront has provided employment to several carvers and informal art dealers and performers, all benefiting from the current setup.	Section 1.3 presents the philosophy of the proposed project. Chapter 4 provides the project overview setting out land use, development area. Section 8. 4 provides the assessment findings of the potential impacts on local businesses.
					Business impacts	The marine cruise industry has brought hundreds of thousands of tourists to Walvis Bay. Our marine life is a huge draw card and attracts guests that would normally not have stopped in Walvis Bay. .The marine cruise industry is based at the current Waterfront.	Section 1.3 presents the philosophy of the proposed project. Chapter 4 provides the project overview setting out land use, development area. Section 8. 4 provides the assessment findings of the potential impacts on local businesses. Sections 8.6, 8.7 and 8.8 provide the findings of the assessment of the Marine Environment.
					Birds	Walvis Bay is known for its lagoon as a RAMSAR site, Any structural changes in the lagoon area will have huge effects on our bird population.	Sections 8.6, 8.7 and 8.8 provide the findings of the assessment of the Marine Environment.
					Planning / Demand	1. Is there enough demand to warrant the size of the new proposed waterfront for residential as well as business needs?	Section 1.2 provides the philosophy of the proposed project, Section 6.11 provides an overview of the planned future development of the town and Section 6.15 provides the current socio baseline and future development and growth (economy, tourism)

Date Registered	Title	Surname	Organisation and/or property description (if landowner/legal occupier)	Stakeholder Group	Aspect	Please describe the nature of your interest in this project / Do you have any specific concerns associated with the Project (for example: water, soil, pollution, Cultural or historical)?	Area addressed
					Impacts to existing waterfront	2. During construction, would the current waterfront be able to continue as it is? Will there be made any provisions for possible interim times?	Section 8. 4 provides the assessment findings of the potential impacts on local businesses. Section 8.5 provides the assessment findings of the potential impacts on local society, including traffic and access.
					Business impacts	3. Will current Waterfront businesses be given first option for possible new business sites in this forced relocation?	Section 1.2 provides the philosophy of the proposed project
					Business impacts / Boats	4. Where would the marine cruise industry be able to base itself?	Chapter 4 provides the project overview setting out land use, development area and proposed developments within the project.
					Siltation	5. Will the new marina and the necessary digging of trenches contribute to the silting up of the lagoon, inevitably destroying the lagoon forever?	Sections 8.6, 8.7 and 8.8 provide the findings of the assessment of the Marine Environment.
					Business impacts	6. What will happen with the current waterfront and the respective investments made over the past decade?	Section 1.2 provides the philosophy of the proposed project Chapter 4 provides the project overview setting out land use, development area Section 8. 4 provides the assessment findings of the potential impacts on local businesses.
					Boats	7. Will the new Marina provide enough space for our marine cruise industry?	Chapter 4 provides the project overview setting out land use, development area
					Informal vendors	8. Will our current informal vendors get priority for the new location, considering they have been an essential part of the current Walvis Bay Waterfront from the start?	Section 1.2 provides the philosophy of the proposed project Chapter 4 provides the project overview setting out land use, development area Section 8. 4 provides the assessment findings of the potential impacts on local businesses.
25.5.2017	Mrs	van Week	We operate under Two Oceans Events CC next to the restaurant boat.	Member of Affected Community	Business impacts	We are one of the parties that lease a property at the waterfront.	Section 1.2 provides the philosophy of the proposed project Chapter 4 provides the project overview setting out land use, development area Section 8. 4 provides the assessment findings of the potential impacts on local businesses.
					Business impacts	We are concerned about the impact this will have on our community as well as the people who have the lease agreements have build up a name and how will we be impacted.	Section 1.2 provides the philosophy of the proposed project Chapter 4 provides the project overview setting out land use, development area Section 8. 4 provides the assessment findings of the potential impacts on local businesses. Section 8.5 provides the assessment findings of the potential impacts on local society, including local residents .
25.5.2017	Miss	Behr		Member of Affected Community	No Comments	No Comments	NA
26.5.2017	MR	Lamek	Ministry of Environment & Tourism. 643 Henrich Baumann Str.	Provincial or Government Official	Positive development	I am very much interested in the project as it brings development to Walvis Bay town and create job for the residence here while the project is adhere and compliance to EIA instructions as received form Ministry of Environment & Tourism	Chapter 4 provides the project overview setting out land use, development area
					Liquid waste	The big concern is water pollution, I wish the project cannot contribute to this by managing the their liquid waste properly for the sake of not polluting our ocean in return which might have negative effect on our flora and fauna in our blue sea. Noise pollution as well have negative impact to marine biodiversity.	Chapter 4 provides the project overview setting out land use, development area and drainage design. Section 8.5 provides the findings of the assessment of the upgrades to bulk services such as sewerage and water supply. Sections 8.6, 8.7 and 8.8 provide the findings of the assessment of the Marine Environment.

Date Registered	Title	Surname	Organisation and/or property description (if landowner/lawful occupier)	Stakeholder Group	Aspect	Please describe the nature of your interest in this project / Do you have any specific concerns associated with the Project (for example: water, soil, pollution, Cultural or historical)?	Area addressed
26.5.2017	Mrs	Goldsack	Raft Owner	Member of Affected Community	Business Impact / Construction	Negative impact on our business during the period from commencement of, to completion of the project.	Section 1.2 provides the philosophy of the proposed project Chapter 4 provides the project overview setting out land use, development area Section 8. 4 provides the assessment findings of the potential impacts on local businesses.
26.5.2017	Mr	Goldsack	Raft Owner	Member of Affected Community	Business Impact / Construction	Negative impact on our business during the period from commencement of, to completion of the project.	Section 1.2 provides the philosophy of the proposed project. Chapter 4 provides the project overview setting out land use, development area Section 8. 4 provides the assessment findings of the potential impacts on local businesses.
27.5.2017	Mr	Fredericks	We are one of the catamaran companies currently operating at the Walvis Bay Waterfront.	Member of Affected Community	Marina	Interested in all aspects of the project and how its going to affect the current operation of the vessels operating at the waterfront.	Section 1.2 provides the philosophy of the proposed project. Chapter 4 provides the project overview setting out land use, development area
27.5.2017	Mr	Stauder	Lawful Occupier	Member of Affected Community	Positive development	To view and understand the impact it will have on the Lagoon area of Walvis Bay. Research and look into possible investment opportunities. Also to see how it will impact the environment of noise and sound increase in the calm area.	Section 1.2 provides the philosophy of the proposed project Chapter 4 provides the project overview setting out land use, development area Sections 8.6, 8.7 and 8.8 provide the findings of the assessment of the Marine Environment. Section 8.5 provides the assessment findings of the potential impacts on local society, including local residents and local amenity
					Noise	Noise Pollution, , wild life impact	Chapter 4 provides the project overview setting out land use, development area Sections 8.6, 8.7 and 8.8 provide the findings of the assessment of the Marine Environment. Section 8.5 provides the assessment findings of the potential impacts on local society, including local residents and local amenity
					Cricket pitch and pool	replacement of cricket field / public pool	Chapter 4 provides the project overview setting out land use, development area Section 8.5 provides the assessment findings of the potential impacts on local society, including local residents and relocation of sporting facilities.
29.5.2017	Mrs	Amatsi	Local or District Official	Local Authority		No Comments	NA
	Mr	Kolberg	Ministry of Environment and Tourism National Coordinator for the International Waterbird Census National Coordinator for the Southern African Bird Atlas Project National Technical and Scientific Focal Point for the Ramsar Convention	Provincial or Government Official	RAMSAR and Birds	In my official capacity as outlined above	Chapter 4 provides the project overview setting out land use, development area. Sections 8.6, 8.7 and 8.8 provide the findings of the assessment of the Marine Environment, including birds and the Ramsar Site

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2.6.2017	Dr	Elwen	Sea Search Africa. Namibian Dolphin Project. University of Pretoria	Non-Governmental Organisation (NGO)	Mammals	Potential environmental impact on the lagoon which is a RAMSAR site, and also an important feeding area for bottlenose dolphins	Chapter 4 provides the project overview setting out land use, development area. Sections 8.6, 8.7 and 8.8 provide the findings of the assessment of the Marine Environment, including birds and the Ramsar Site, and marine mammals.
3.6.2017	Mr	McNamara	Urban design studio namibia	Member of Affected Community	Town Planning	Urban design	Chapter 4 provides the project overview setting out land use, development area and overall design.
					Town Planning	Urban design Public space destruction Environmental	Chapter 4 provides the project overview setting out land use, development area and overall design.
3.6.2017	Mr	Bellens		Member of Affected Community		Living nearby with a green heart.	
					RAMSAR and Birds	– How it will affect the ecosystem in the Lagoon	Sections 8.6, 8.7 and 8.8 provide the findings of the assessment of the Marine Environment, including birds and the Ramsar Site, and marine mammals.
					Planning / Demand	– Proof of need for this development (commercial business especially).	Section 1.2 provides the philosophy of the proposed project, Section 6.11 provides an overview of the planned future development of the town and Section 6.15 provides the current socio baseline and future development and growth (economy, tourism). Section 8. 4 provides the assessment findings of the potential impacts on local businesses.
					Planning / Demand	– Logistics (delivery of supplies)	Chapter 4 provides the project overview setting out land use, development area and overall design.
					Traffic	– Traffic and parking	Chapter 4 provides the project overview setting out land use, development area and overall design.
					Planning and Design	– Energy neutral building/footprint of construction and running/maintenance.	Chapter 4 provides the project overview setting out land use, development area and overall design.
4.6.2017	Mr	Adams	ERF40WB	Member of Affected Community	Town Planning	Am totally opposed to the proposed construction of flats, offices, hotel, shops etc on one of the last public open spaces left in Walvis Bay which is surrounded by a upmarket quiet and well established residential area.	Chapter 4 provides the project overview setting out land use, development area and overall design. Section 6.11 provides an overview of the planned future development of the town and Section 6.15 provides the current socio baseline and future development and growth (economy, tourism). Summary of the Walvis Bay Integrated Urban Development Framework.
					Water supply	Water supply is already under huge pressure in the area.	Chapter 4 provides the project overview setting out land use, development area and upgrades to the current system. Section 8.5 provides the findings of the assessment of the upgrades to bulk services such as sewerage and water supply.
					Sewerage	Sewerage system cannot manage the current day to day flows, with drains overflowing daily in this part of the Lagoon area.	Chapter 4 provides the project overview setting out land use, development area and upgrades to the current system. Section 8.5 provides the findings of the assessment of the upgrades to bulk services such as sewerage and water supply.
					Town Planning	There are plenty of new residential areas in Walvis Bay set up for high density zoning. This area is not one of them.	Chapter 4 provides the project overview setting out land use, development area and overall design. Section 6.11 provides an overview of the planned future development of the town and Section 6.15 provides the current socio baseline and future development and growth (economy, tourism).

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					Planning	This is another attempt by a developer to make quick money with the lagoon frontage property and once that is sold off there is no guarantee that "phase 2" will ever be completed.	Chapter 4 provides the project overview setting out land use, development area and overall design. Section 6.11 provides an overview of the planned future development of the town and Section 6.15 provides the current socio baseline and future development and growth (economy, tourism). Summary of the Walvis Bay Integrated Urban Development Framework.
This development should NOT be approved under any circumstances.							
4.6.2017	Mrs	Weylandt	Erf 40WB Part owner Erf 3961WB	Member of Affected Community		TOTALLY OPPOSED TO PROPOSED "WATERFRONT" DEVELOPMENT.	
					Water supply	Water supply is already under pressure in the immediate area neighbouring the site under discussion.	Chapter 4 provides the project overview setting out land use, development area and upgrades to the current system. Section 8.5 provides the findings of the assessment of the upgrades to bulk services such as sewerage and water supply.
					Water supply	Water pressure so low that no pressure to supply double-storey homes never mind 10 storey hotel and blocks of flats.	Chapter 4 provides the project overview setting out land use, development area and upgrades to the current system. Section 8.5 provides the findings of the assessment of the upgrades to bulk services such as sewerage and water supply.
					Sewerage	Sewerage system cannot manage currents supply..... drains overflowing weekly.	Chapter 4 provides the project overview setting out land use, development area and upgrades to the current system. Section 8.5 provides the findings of the assessment of the upgrades to bulk services such as sewerage and water supply.
					Town Planning	This is a top drawer established and quiet residential area that should not be targeted for high density flats, offices, shops and a hotel.	Chapter 4 provides the project overview setting out land use, development area and overall design. Section 6.11 provides an overview of the planned future development of the town and Section 6.15 provides the current socio baseline and future development and growth (economy, tourism). Summary of the Walvis Bay Integrated Urban Development Framework.
This development should NOT be approved.							
4.6.2017	Mr	Moormann	Owner Erf 1294WB	Member of Affected Community		TOTALLY OPPOSED TO PROPOSED "WATERFRONT" DEVELOPMENT	
					Water supply	Existing Water supplies are already under pressure and the water pressure is so low there are already problems supplying double storey houses.	Chapter 4 provides the project overview setting out land use, development area and upgrades to the current system. Section 8.5 provides the findings of the assessment of the upgrades to bulk services such as sewerage and water supply.
					Sewerage	Sewerage system is already under pressure and drains overflow weekly.	Chapter 4 provides the project overview setting out land use, development area and upgrades to the current system. Section 8.5 provides the findings of the assessment of the upgrades to bulk services such as sewerage and water supply.
					Town Planning	High density housing together with a hotel, shops and offices and a number of blocks of flats should never be considered for one of the last Public Open Spaces within an upmarket residential area in Walvis Bay.	Chapter 4 provides the project overview setting out land use, development area and overall design. Section 6.11 provides an overview of the planned future development of the town and Section 6.15 provides the current socio baseline and future development and growth (economy, tourism). Summary of the Walvis Bay Integrated Urban Development Framework.
					Sporting	The sporting facilities are being utilised EVERY day by a vast array of members of the community of Walvis Bay. It would be a disgrace should this development be allowed to go ahead.	Chapter 4 provides the project overview setting out land use, development area and overall design. Section 6.11 provides an overview of the planned future development of the town and Section 6.15 provides the current socio baseline and future development and growth (economy, tourism). Summary of the Walvis Bay Integrated Urban Development Framework.

Date Registered	Title	Surname	Organisation and/or property description (if landowner/lawful occupier)	Stakeholder Group	Aspect	Please describe the nature of your interest in this project / Do you have any specific concerns associated with the Project (for example: water, soil, pollution, Cultural or historical)?	Area addressed
					Planning	Developers cannot give any assurances that the entire project will be completed..... it is clear the developers focus is on the resale of the property immediately facing the lagoon.	Section 1.2 provides the philosophy of the proposed project. Chapter 4 provides the project overview setting out land use, development area and overall design.
					Home values	Negative impact on the value of my home in 20 KR Thomasstreet by this development	Section 8.5 provides the assessment findings of the socio impact assessment, including impacts on house prices.
4.6.2017	Ms	Schmidt	Owner Erf 29WB	Member of Affected Community		TOTALLY OPPOSED TO PROPOSED "WATERFRONT" DEVELOPMENT	
					Water supply	Existing Water supplies are already under pressure and the water pressure is so low there are already problems supplying double storey houses.	Chapter 4 provides the project overview setting out land use, development area and upgrades to the current system. Section 8.5 provides the findings of the assessment of the upgrades to bulk services such as sewerage and water supply.
					Sewerage	Sewerage system is already under pressure and drains overflow weekly.	Chapter 4 provides the project overview setting out land use, development area and upgrades to the current system. Section 8.5 provides the findings of the assessment of the upgrades to bulk services such as sewerage and water supply.
					Town Planning	High density housing together with a hotel, shops and offices and a number of blocks of flats should never be considered for one of the last Public Open Spaces within an upmarket residential area in Walvis Bay.	Chapter 4 provides the project overview setting out land use, development area and overall design. Section 6.11 provides an overview of the planned future development of the town and Section 6.15 provides the current socio baseline and future development and growth (economy, tourism). Summary of the Walvis Bay Integrated Urban Development Framework.
					Sporting	The sporting facilities are being utilised EVERY day by a vast array of members of the community of Walvis Bay. It would be a disgrace should this development be allowed to go ahead.	Chapter 4 provides the project overview setting out land use, development area and overall design. Section 6.11 provides an overview of the planned future development of the town and Section 6.15 provides the current socio baseline and future development and growth (economy, tourism). Summary of the Walvis Bay Integrated Urban Development Framework.
					Planning	Developers cannot give any assurances that the entire project will be completed..... it is clear the developers focus is on the resale of the property immediately facing the lagoon.	Section 1.2 provides the philosophy of the proposed project. Chapter 4 provides the project overview setting out land use, development area and overall design.
						See initial letter of objection submitted.	
4.6.2017	Mr	Du Preez		Member of Affected Community	RAMSAR and Birds	The Walvis Bay lagoon, a Ramsar site that is already silting up, will be negatively affected by these proposed developments;	
					Demand	There is no need for another waterfront in Walvis Bay, as Nampont has a waterfront, that will be extended in future;	Chapter 4 provides the project overview setting out land use, development area and overall design. Section 6.11 provides an overview of the planned future development of the town and Section 6.15 provides the current socio baseline and future development and growth (economy, tourism). Summary of the Walvis Bay Integrated Urban Development Framework. 6.12 provides the status of the Nampont project.
					Home values	The Lagoon residential area will be negatively affected by this development;	Section 8.5 provides the assessment findings of the socio impact assessment, including impacts on house prices.
						This is obvious just a money making development that will have lots of negative results for the town;	Section 1.3 provides the philosophy and benefits of the project.

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					Town Planning	There is no need for another shopping centre in Walvis Bay and definitely not in the best residential area of the town, weather wise.	Chapter 4 provides the project overview setting out land use, development area and overall design. Section 6.11 provides an overview of the planned future development of the town and Section 6.15 provides the current socio baseline and future development and growth (economy, tourism). Summary of the Walvis Bay Integrated Urban Development Framework.
5.6.2017	Mrs	Winborn	Erf 245, Lagoon Area (12 Fritz Lange Street)	Member of Affected Community		As lawfull occupant of property near the development.	
					Sporting	Historical & Recreational As Club Committee Member of JCCA, making use of the Cricket Oval for the development of Cricket.	Chapter 4 provides the project overview setting out land use, development area and relocation of sporting grounds.
5.6.2017	Mr	Stewart	Stewart Planning – professional and personal capacity; in conjunction with United Africa Group.	Member of Affected Community		Watching brief of development in Walvis Bay.	Chapter 4 provides the project overview setting out land use, development area and construction activities
						Interest in overall development of Walvis Bay Waterfront – Walvis Bay Council/Afrikuumba and NamPort development proposals.	Chapter 4 provides the project overview setting out land use, development area and design of the project.
						Oversee development in/around Pelican Bay Hotel.	Chapter 4 provides the project overview setting out land use, development area and design of the project.
					RAMSAR and Birds	Marina proposals; viability and impact on the Lagoon.	Chapter 4 provides the project overview setting out land use, development area. Sections 8.6, 8.7 and 8.8 provide the findings of the assessment of the Marine Environment, including birds and the Ramsar Site
					Traffic	General traffic impact – particularly the closure of part of the Esplanade.	Chapter 4 provides the project overview setting out land use, development area, new road and design of the project. Section 6.14 provides information on the existing and future traffic and road use. Section 8.5 provides the findings of the socio assessment, including access and traffic volumes.
					Pedestrian	Pedestrian impact of closure of Lagoon Promenade.	Chapter 4 provides the project overview setting out land use, development area, new road and design of the project. Section 8.5 provides the findings of the socio assessment, including access and traffic volumes
					Sporting	Replacement of existing community facilities – particularly swimming pool, tennis courts and cricket field.	Chapter 4 provides the project overview setting out land use, development area and relocation of sporting grounds.
					Demand	Sheer size of project in relation to Walvis Bay growth.	Section 1.2 provides the philosophy of the proposed project, Section 6.11 provides an overview of the planned future development of the town and Section 6.15 provides the current socio baseline and future development and growth (economy, tourism). Section 8. 4 provides the assessment findings of the potential impacts on local businesses.
					Demand	integration with NamPort Waterfront proposals and other existing/proposed developments.	Section 4.11 provides a summary of how the project will integrate with other developments. Section 6.12 provides information on Namport.

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					Services	Availability/provision of essential services.	Chapter 4 provides the project overview setting out land use, development area and upgrades to the current system. Section 8.5 provides the findings of the assessment of the upgrades to bulk services such as sewerage and water supply.
6.6.2017	Mr	Lottering	JCCA Cricket Club – Chairperson			Concerned member of the affected community	
						Historical Concerned as the recreational facilities for the young children will be taken away, such as cricket players, tennis players and swimming pool. Even the 'jukskei' players are affected.	Chapter 4 provides the project overview setting out land use, development area and relocation of sporting grounds. Section 8.5 provides the findings of the socio assessment, including impacts of relocated sporting facilities.
6.6.2017	Mr	Hangula	Owner of JCCA Academy – Cricket development academy			I am concerned that the development of cricket will be affected.	Chapter 4 provides the project overview setting out land use, development area and relocation of sporting grounds. Section 8.5 provides the findings of the socio assessment, including impacts of relocated sporting facilities.
						Historical Firstly I am concerned that the development of cricket in the younger generation will be affected if the Oval will be taken away. Even if they move the Oval to another place, as the rumour has it it will be moved to Kuisebmond or Narraville, it will have an effect on the youngsters as there are almost 80 young boys in town actively practising cricket at the oval. It is also used to host many a cricket tournament.	Chapter 4 provides the project overview setting out land use, development area and relocation of sporting grounds. Section 8.5 provides the findings of the socio assessment, including impacts of relocated sporting facilities.
						Secondly I will be at loss of income as I am the owner of the academy developing the youngsters at the oval, as most of the parents will not allow their children to practise in Kuisebmond or Narraville.	Chapter 4 provides the project overview setting out land use, development area and relocation of sporting grounds. Section 8.5 provides the findings of the socio assessment, including impacts of relocated sporting facilities.
						Other recreational facilities such as Tennis, Swimming and 'Jukskei' will also be affected.	Chapter 4 provides the project overview setting out land use, development area and relocation of sporting grounds. Section 8.5 provides the findings of the socio assessment, including impacts of relocated sporting facilities.
6.6.2017	Mrs	Celotto	Walvis bay cricket club			No Comments	
6.6.2017	Mr	Dichtl	Namibia Consulting Engineers and Project Managers (Pty) Ltd.	Member of Affected Community	Recreational Facilities	Water sport (Windsurfing, Kiting, Stan Up Paddling, sailing) and professional	Chapter 4 provides the project overview setting out land use, development area and proposed developments and facilities.
					Siltation	Siltation of lagoon – particularly the Marina.	Sections 8.6, 8.7 and 8.8 provide the findings of the assessment of the Marine Environment, including siltation
8.6.2017	Mrs	Louw	Owner No 2 Peter Dixon Street	Member of Affected Community		General interest	
8.6.2017	Mr	Louw	Owner : No 4 Peter Dixon Street	Member of Affected Community	Home values	General interest to evaluate the effect the project will have on the area	Chapter 8 provides the assessment findings.
8.6.2017	Dr	Kreiner	MFMR	Provincial or Government Official	RAMSAR AND BIRDS	Coastal zone management, impact to lagoon, a RAMSAR site and impacts on marine mammals. Impacts on hydrodynamics of lagoon, marine mammals and birds.	Sections 8.6, 8.7 and 8.8 provide the findings of the assessment of the Marine Environment.
5.6.2017	Mr	Pretorius	Mola Mola Safaris				

Date Registered	Title	Surname	Organisation and/or property description (if landowner/lawful occupier)	Stakeholder Group	Aspect	Please describe the nature of your interest in this project / Do you have any specific concerns associated with the Project (for example: water, soil, pollution, Cultural or historical)?	Area addressed
9.6.17	Mr	Smit	Land Rehabilitation Society of Southern Africa	NGO		Just interested in the project in general and in projects along the west coast.	Chapter 4 provides the project overview setting out land use, development area and proposed developments and facilities.
					Rehab	Would be interested in the level of rehabilitation planned for disturbed areas.	
10.6.17	Mrs	Hübner	Walvis bay wind and kitesurfing centre (school and club)	Member of Affected Community, Non-Governmental Organisation (NGO)		Our place would be gone and no plans for relocation The planed waterfront is not needed in walvis bay, it looks ugly and disturb the nice park and splash pools	Chapter 4 provides the project overview setting out land use, development area and proposed developments and facilities. Chapter 4 provides the project overview setting out land use, development area and proposed developments and facilities.



Environmental and Social Impact Assessment Addendum Report

Walvis Bay Waterfront Pty Ltd

PREPARED FOR



March 2018

TITLE AND APPROVAL PAGE

Project Name:	Walvis Bay Waterfront – ESIA Addendum Report
Client Name:	Walvis Bay Waterfront Pty Ltd
Ministry Reference:	MET Scope of environmental impact assessment for proposed project of Walvis Bay Waterfront Project, Walvis Bay, Erongo Region
Status of Report:	Submission to Government (MET)
Date of issue:	16th March 2018
Review Period	Government Record of Decision

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www.eccenvironmental.com

Confidentiality

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DEFINITIONS AND ABBREVIATIONS

DEA	Directorate of Environmental Affairs
EAP	Environmental Assessment Practitioner
EIA	Environmental Impact Assessment
EMA	Environmental Management Act
EMP	Environmental Management Plan
GCN	Gondwana Collection Namibia
IFC	International Finance Cooperation
I&AP	Interested and affected parties
IUCN	International Union for Conservation of Nature
JMC	Joint Management Committee
MAWF	Ministry of Agriculture Water and Forestry
MET	Ministry of Environment and Tourism

1. INTRODUCTION

1.1. PURPOSE OF THE ADDENDUM

This addendum report has been compiled following the public review period of the Environment and Social Impact Assessment (ESIA) for the proposed Walvis Bay Waterfront development proposed by the proponent 'Walvis Bay Waterfront Properties Pty Ltd'.

An ESIA was completed for the project and undertaken in accordance with the requirements of the Environmental Management Act, 2007 (Act No. 7 of 2007) and the Environmental Impact Assessment Regulation, 2007 (No. 30 of 2011) gazetted under the Environmental Management Act, (EMA), 2007 (Act No. 7 of 2007).

Environmental Compliance Consultancy (ECC) prepared the ESIA report, which was provided for public review for the period between 15th January - 5th February 2018.

This addendum compiles all comments received during the public review period; presents the responses from ECC and the proponent; and signposts where further information has been provided in the ESIA report.

The addendum report has been set out to provide a concise summary as set out below in table 1.

Table 1 - ESIA Report Structure

CHAPTER	TITLE	CONTENT
-	Acronyms	A list of acronyms used throughout the report
1	Introduction	This chapter introduces the addendum report provides background information on the ESIA process
2	Summary of Comments	This chapter provides a summary of comments received from I&APs and Stakeholders
3	Acknowledgements	Provides acknowledgements for the ESIA and Addendum
4	Detailed Comment and Response Table	The detailed list of comments received during the public review with comments

The addendum report has the following supporting appendices:

- 1 Formal letter from Walvis Bay CEO in response to comment Number 2
- 2 Ramsar Email
- 3 Bergmann Hendrik DMC CV
- 4 Written comments from Public Review Period
- 5 Review undertaken by the Southern African Institute for Environmental Assessment

2. SUMMARY OF COMMENTS FROM I&APS

2.1. INTRODUCTION

The ESIA report was formally submitted to the relevant competent authorities, Ministry of Environment and Tourism (MET) and Interested and Affected Parties (I&APs) on Monday 15th January 2018 for public and stakeholder comment. Comments received were collated in a register that is presented in Table 2. Each comment has been responded to, and where they were deemed to be material to the decision making or enhanced the ESIA, amendments were made to the ESIA report, with cross references in the collated register as presented in Table 2. Where substantial changes were made due to feedback, amended or new sections have been signposted in the Addendum Report table for easy review and reference.

The Final ESIA report has been issued to the MET and relevant competent stakeholders and I&APs to accompany the application for an Environmental Clearance Certificate.

The final ESIA report is available to download at: www.eccenvironmental.com

2.2. KEY FEEDBACK

The ESIA was provided to all I&APs, identified stakeholders and made publicly available on ECC's website to solicit comments, feedback and allow genuine participation in the ESIA process. Five sets of comments were received during the review process, from different stakeholder groups/types including private residents who neighbour the proposed project site; Ministry of Fisheries and Marine Resources; local town planning expert; businesses including the Raft and Protea Hotel; and finally feedback from the independent 3rd party review from the Southern African Institute for Environmental Assessment (SAIEA) (see Appendix 5).

This varied group of I&APs and stakeholders for the project presented useful, meaningful and valuable input into the ESIA. Where required, further information has been provided in this Addendum report to address the area of concern or to answer the question presented. The balanced feedback consisted of some corrections; identification of errors; requests for further information; and in some cases, feedback was given to ECC confirming that their original concerns had been adequately addressed in the ESIA and that no further comments relating to that topic were required.

The key areas raised from the review can be summarised in the following categories:

- **CIA:** Further work to strengthen the CIA and to understand the potential impacts this project may have in combination with other potential projects was requested.
 - ✓ ECC conducted further work on the CIA to address this key concern, the addition of a more detailed CIA has been provided in the final ESIA report.
- **Water Quality:** Initial feedback from the SAIEA requested further information be provided in the report to address water quality and sediment quality to determine the impact of dredging sediments may have on the lagoon.
 - ✓ ECC conducted further research and included information to address this concern.
- **No Marina Option:** MFMR requested further details on the alternative considered with no marina as part of the proposed project.
 - ✓ ECC updated the alternative sections in the report to include the no marina option.
- **The Raft and Protea Hotel:** Key concerns relate to impacts to their business during construction.
 - ✓ Several additions and or comments pertaining to these concerns have been addressed throughout the report and each concern is signposted with a response or where further information has been included to address this.

3. ACKNOWLEDGEMENTS

ECC would like to thank the I&APs and stakeholders for providing feedback during the ESIA process. The feedback received has resulted in a robust and detailed ESIA that has been developed to international standards and complies with the IFC guidelines.

ECC acknowledges that constructive feedback results in a more robust and improved ESIA. This process results in a project that is understood by the community and I&APs. The I&APs feedback has contributed to the design of the development and potential issues or concerns have been addressed and considered throughout the design development process.

ECC would like to thank all specialists for their input during the ESIA, to all our local experts, especially Mr Peter Bridgeford and Mr Allen Louw; thank you for your wisdom and assistance with developing sound mitigation measures and for your care in passing on your knowledge of the local environment.

Thank you to the SAIEA and the MFMR for the constructive feedback and challenging feedback, this has resulted in an improved ESIA that assure protection to the environment and minimised impacts from the proposed project.

Although the official public review period is over, the proponent and ECC is open to continued consultation with I&APs and stakeholders. As outlined in the ESMPs, consultation will be ongoing through the construction and operations of the proposed project. We look forward to the implementation phase of the project and continued work with all stakeholders.

Lastly ECC would like to thank the proponent for being so considerate and accommodating to the input and feedback from the ESIA team. Thank you for taking on and including feedback from the I&APs, local experts and our team the behaviour of this proponent in terms of taking environmental considerations seriously and into account must be commended. The approach to this ESIA process by the Developer/Proponent, taking into account environmental and social issues has resulted in a sustainable development that meets environmental and social objectives.

4. DETAILED COMMENT AND RESPONSE FROM PUBLIC REVIEW

Table 2 - I&AP and Stakeholder Feedback

No.	Chapter	Section	I&AP / Stakeholder Comment Received	Stakeholder details	Response / Clarification
1	General	General	<p>Request for clarification; confusing use of different company names:</p> <p>In the Background Information Document of June 2017, Walvis Bay Waterfront Development Pty Ltd is named as the developer.</p> <p>On the January 2018 ESIA cover sheets, Walvis Bay Waterfront Pty Ltd is listed, as well as stated as the Client Name on the inside cover.</p> <p>In the above documents, e.g. on page 3 of the ECC-41-54-REP-25-A Document, reference is repeatedly made to Walvis Bay Waterfront Properties Pty Ltd.</p> <p>Are there in fact three different companies involved in the Walvis Bay Waterfront project? If so, there is material failure to explain the relationship of the three companies in the proposed project.</p> <p>If the name of the developer appears in three different versions, but refers to only one single entity, this is a material defect and could be construed as misleading.</p> <p>Your urgent attention to this issue is required.</p>	Gerhard Rossler grossler@iway.na P O Box 670 Walvis Bay Mobile: 081 124 3628	<p>This was an error. The proponent should be as follows:</p> <p>Walvis Bay Waterfront Properties Pty Ltd.</p> <p>The ESIA Report has been amended to reflect this. The BID report has been finalised and therefore is noted as an error.</p>

No.	Chapter	Section	I&AP / Stakeholder Comment Received	Stakeholder details	Response / Clarification
2	8	8.4 & 8.5	<p>Socio-economic impacts:</p> <p>Since the Walvis Bay Municipality is a proponent and shareholder in this project, presumably providing director(s) on the board of the development company, this makes by extension every inhabitant, or at least all registered property owners, tenants of properties or businesses who are registered at the Municipality an Interested and Affected Person. This is so by the fact that the Municipality is entering into a commercial enterprise, which may require financial and material resources to be invested into this project and may also involve certain commercial risks and exposures, which could affect the availability of funds or resources of the Municipality, possibly to the detriment of the inhabitants, especially those of lower income groups.</p> <p>The main source of the Municipality's funds is from rates, taxes and services levied upon the residents and they therefore have a vested stake in the Municipality's financial affairs.</p> <p>IT MAY ALSO FORCE THE MUNICIPALITY TO MAKE CHOICES IN FAVOUR OF AN UP-MARKET DEVELOPMENT FOR THE AFFLUENT VS. THE REQUIREMENTS OF THE MAJORITY OF THE LOWER AND MIDDLE-INCOME INHABITANTS.</p> <p>Considering the above argument, the ESIA comes short in providing critical judgement on the effect that this project may have with the Walvis Bay Municipality as partner and shareholder. For</p>	<p>Gerhard Rossler grossler@iway.na P O Box 670 Walvis Bay Mobile: 081 124 3628</p>	<p>Walvis Bay Municipality has provided a formal written response to this comment/concern and is provided as Appendix 1 to this addendum.</p> <p>To reiterate, the shareholdings are 80% Afrikuumba and 20% for the Municipality. The Municipality shall lease the land for a period of 50 years through a private treaty transaction. Approval was granted (July 2015) in terms of Section 30 (1) (z) (aa), of the Local Authorities Act, 1992 (Act 23 of 1992), as amended.</p> <p>The agreements as part of the JV is that all risks and the cost relating to the principle approval be borne by the applicant (Afrikuumba), and that the Council will not be liable for any direct and/or related costs in this regard.</p> <p>Covered in the ESIA report in section 4.1.11.1</p>

No.	Chapter	Section	I&AP / Stakeholder Comment Received	Stakeholder details	Response / Clarification
			<p>example; has the Municipality made a proper Risk Assessment on their involvement in this project? Has the alternative of selling the two erven on which the proposed Waterfront is to be developed been considered as an alternative? It certainly would provide cash resources for much-needed land development for the huge backlog in the provision of housing?</p> <p>The absence of discussion and consultation with the inhabitants of Walvis Bay on these issues is a glaring omission in the coverage of the socio-economic impact of this development.</p>		
3	8	8.9	<p>A CIS is virtually circumvented in the ESIA, yet there are compelling reasons why this should be done in great detail and with arm's length honesty. The adjacent property in the north-western corner of erf 4941, (ref page 39, 4.1.4 Adjacent Areas of the ESIA), has been sold and according to news reports, a large hotel is to be built on this property in the near future.</p> <p>Together with the proposed hotel in the Namport Waterfront development, we are now looking at a potential four new hotels in the area. This certainly should be well considered in a CIA. Already the provision of around 200 new hotel rooms at the proposed development covered in the ESIA, there is a danger of swamping the Walvis Bay Hotel and Guest House accommodation market to the</p>	Gerhard Rossler grossler@iway.na P O Box 670 Walvis Bay Mobile: 081 124 3628	<p>As stated in Section 7.1.2, the IFC CIA Good practice Handbook has been applied to the CIA. Due to the lack of uncertainty associated with anticipated development, lack of data for realistic developments, and limited strategic regional, sectoral and integrated resource planning schemes, the scope of the CIA is limited.</p> <p>Chapter 8, Section 8.10, states that the CIA considers reasonable foreseeable future projects that are committed or realistically defined at the time of the assessment (see IFC Performance Standard quote included below) Whilst the Namport Waterfront Project is widely known, and local newspapers reported a new hotel on erf 4941, these are not considered as committed developments (not realistically defined or financially commitment as per IFC standards), therefore have not been considered in the assessment due to the level of uncertainty. This approach is in accordance with international best practice for CIA.</p>

No.	Chapter	Section	I&AP / Stakeholder Comment Received	Stakeholder details	Response / Clarification
			<p>detriment of all involved. Again, the involvement of the Walvis Bay Municipality in the provision of this hotel room overkill merits further discussion.</p>		<p>In addition to this, no data or information is available on these developments; therefore data required for the assessment would be uncertain at this stage. There would be no value in undertaking a detailed CIA made up of assumptions for various developments which are not committed or realistically defined.</p> <p>The findings of the assessment would not be realistic and unfounded as the effects could be overestimated or under estimated, therefore jeopardising the viability and integrity of the assessment, which would lead to over mitigating the project unnecessarily or not providing enough mitigation. This is acknowledged in the assessment. This however should not hold up the development of the proposed project, as discussed in the response to comment 72 (United Africa Group).</p> <p>Nevertheless, the CIA has been refined to acknowledge Phases 2 and 3 of the Namport Expansion Project (as these are considered as future realistically defined developments, and can result in future cumulative impacts), and the Baseline Section has been expanded to include a Future Baseline Section, which presents the an indication of how the environmental and social baseline with Namport but without the proposed development is likely to change. This supports the findings of the expanded CIA.</p> <p>The IFC Performance Standard 1 (Paragraph 5) defines the broader Project area to include “... <i>areas potentially impacted by cumulative impacts from further planned development of the Project, any existing project or condition, and other project-related developments that are realistically defined at the time the Social and Environmental Assessment is undertaken.</i>”</p>

No.	Chapter	Section	I&AP / Stakeholder Comment Received	Stakeholder details	Response / Clarification
					<p>The feasibility and bankability of the project has been determined on market demand and is in line with investor due-diligence.</p> <p>The ultimate determination of all of the mentioned development projects is the responsibility of the competent authority undertaking the relevant permitting and approvals processes. In addition, the advertised development on erf 4941 is not included in the Walvis Bay IUSDF or development plans and therefore would not be compliant with the Walvis Bay plans.</p>
4	8	8.5	<p>Sports Facilities:</p> <p>It is unacceptable that there should be a one-year long waiting period until pool; tennis courts etc. are re-located to the Jan Wilken Sports Area. If one looks at the experience of the Swakopmund Municipal Pool relocation, the period will probably be significantly longer.</p> <p>It is also not clear; to what extent the Walvis Bay Municipality has exposure to additional expenditure for the sports facility relocation.</p>	Gerhard Rossler grossler@iway.na P O Box 670 Walvis Bay Mobile: 081 124 3628	<p>Whilst there will be a delay to developing the relocated facilities, Phase One will need to commence based on economic grounds. An ESIA is holistic and needs to assess environment, society and economy, and should not be biased towards one. The development schedule has taken into consideration all three, and where possible, the 'waiting period' shall be minimised as much as possible without compromising the project.</p> <p>The Developer intends to commence with relocation as soon as possible once site clearance commences. This will occur simultaneously.</p> <p>All costs for the relocation of the sporting facilities will be born by Afrikuumba and not the municipality, throughout construction and operations (stated in Section 4.1.11.1).</p>
5	General	General	<p>In the light of the above arguments, I propose that further public information is needed, to be discussed at public meetings, which address the broader spectrum of the Walvis Bay population.</p>	Gerhard Rossler grossler@iway.na P O Box 670 Walvis Bay Mobile: 081 124	<p>Public participation has been undertaken in accordance with the requirements of the EMA (2012) and shall continue through social media platforms that have demonstrated a wide audience within Walvis Bay and Namibia.</p>

No.	Chapter	Section	I&AP / Stakeholder Comment Received	Stakeholder details	Response / Clarification
				3628	Further public meetings specific for this ESIA are not planned; however, the social media site will continue and shall be used as a platform for I&APs to raise their concerns. Further engagement with the community is detailed in the EMPs.
6	General	General	Definitions of the areas referred to as the Walvis Bay lagoon and Ramsar site are not consistent throughout entire report (incl. specialists' reports).	NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm r.gov.na	Noted and updated in the ESIA Report. The specialist reports will not be updated; however, this has been noted.
7	General	General	The paper by Wearne. K and Underhill L. G, (2005) is quoted very often. This paper is 13 years old now. If no more recent info is available it might be necessary to collect it during an EIA, rather than rely on old literature?	NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm r.gov.na	Confirmation with Dr Rob Simmons: This paper holds valuable data, which has been re-analysed and added to, including all Sandwich Harbour data and some sophisticated statistics, and has been republished as Simmons et al 2015 in the journal of Conservation Biology. This reference has been revised accordingly throughout the original ESIA report.
8	General	General	The numbering from Chapter 3 onward is very confusing.	NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm r.gov.na	This feedback is noted. The report has been reformatted where possible.
9	2	2	Chapter 2: Regulatory framework Seashore Ordinance is missing in table 5	NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm r.gov.na	Noted thank you – table 5 updated to include Seashore Ordinance.

No.	Chapter	Section	I&AP / Stakeholder Comment Received	Stakeholder details	Response / Clarification
10	Chapter 3: Approach to the ESIA		Fig 4. Ramsar boundaries not visible	NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm r.gov.na	This figure has been revised to include the Ramsar boundary.
11	Chapter 4: Project description	4.4 Land ownership	It is only mentioned that the off-shore area in the Lagoon is under the control of the Government (managed by MET). Who does it belong to? If it is below the registered high-water mark it belongs to the state. The Seashore Ordinance (1958) prescribes how the high-water mark is surveyed. This is the mandate of the Ministry of Lands and Resettlement (the surveyor general) – nothing of this is even mentioned in the report. The ownership of land and the surveying of the high-water mark need to be done according to Namibian laws to avoid another “Platz am Meer” situation. Walvis Bay Municipality has no jurisdiction over state owned land.	NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm r.gov.na	Noted and agreed. The ESIA reported updated to address this refer to section 4.1.2. The proponent will obtain the appropriate approvals and land ownership from the State prior to construction.
12	Chapter 4: Project description		The included artist impressions are very misleading and should reflect reality. No beach life on white sand will be possible in the area (e.g. Figures 15 and 18). An ESIA should not try and sell the development but reflect reality and assess the impact of the development. Rather mention that in reality there are often algal blooms in the lagoon, depriving the water column of oxygen leading to smelly water and muddy sediments – not the typical beach scenario.	NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm r.gov.na	Comment noted. A statement has been included emphasising that the figures are artistic impressions, and subject to amendments as the design evolves.

No.	Chapter	Section	I&AP / Stakeholder Comment Received	Stakeholder details	Response / Clarification
13	Chapter 4: Project description	4.6.	Suggestion from the meeting with MFMR (to exclude the marina) have not been taken into consideration (in fact, minutes of that meeting have not even been included or supplied after we requested them).	NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm r.gov.na	<p>This was a mistake and is noted - MFMR Meeting notes have been included in Appendix D of the ESIA – Stakeholder Engagement Evidence.</p> <p>The option without a marina was considered in detail with the proponent as a non-development option (see Section 5.2 of the original ESIA report). This option was determined that without a marina, the project would not be feasible, as it would not be considered a waterfront development that the whole development concept is based on. Nevertheless additional text has been included in the revised ESIA report to address and further expand on this ‘no marina’ option please refer to section 5.1.6.</p>
14	Chapter 4: Project description	4.1.25.1.	Anoxic waters will be a major issue and should get the attention and planning needed and not be a simple “oxygenation may be applied”. If there is a need to flush the inner marina, which is very likely given the water conditions, this should be addressed in detail in the ESIA and this might have major impacts on the lagoon.	NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm r.gov.na	<p>The volume of the flushed water will be approximately 2 Olympic swimming pools (5,000m³) (refer to section 4.1.25.1 for further details included in the revised ESIA report). This potential impact was assessed as not potentially causing a significant impact due to the nature of the marine environment (flow of water and tides), therefore was not included in detail in the report as per the methodology - the report focuses on likely significant impacts (rather than including all potential impacts).</p> <p>This ensures that the report is concise and focuses on the key issues (which is considered as international best practice).</p> <p>In addition, engineering controls have been incorporated in the design to prevent potential impacts, and mitigation measures to minimise potential environmental impacts.</p> <p>These measures are included in the Operations EMP, for example, water will be sampled and tested prior to flushing, and depending</p>

No.	Chapter	Section	I&AP / Stakeholder Comment Received	Stakeholder details	Response / Clarification
					on the results, the appropriate methods will be applied.
15	Chapter 5: Alternative sites and evolution		No alternate proposal of the development without a marina, a very controversial part of the development in the sensitive lagoon area, has been proposed. Why not?	NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm r.gov.na	Please refer to comment 13, provided by NatMIRC staff members.
16	Chapter 5: Alternative sites and evolution		Table 12 does not say if the IUSDF Marine Development Area is compliant with the SEA. Does this mean it is not compliant? It should be mentioned if it is compliant or not. The IUSDF Marine Development Area also overlaps with the Ramsar site (see Fig. 5).	NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm r.gov.na	This has been rectified and Table 12 has been updated. Figure 5 is correct - the area for the proposed project is within the RAMSAR Site.
17	Chapter 5: Alternative sites and evolution	5.4	It is mentioned that boat users were consulted and the designs presented to them. No attendance register or minutes of these consultations are included in the report. These should be included and circulated	NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm r.gov.na	The Yacht Club was consulted with and the designs were circulated to the members as the Yacht Club as a registered I&AP. Meetings have been held between the developer and various local boat operators to discuss commercial terms of operating out of the marina. Feedback from boat operators from these meetings/consultations has been incorporated into the design but no formal minutes kept.
18	Chapter 5: Alternative sites and evolution	5.1.6	" New land or infrastructure does not extend into the Lagoon," - the new structure clearly extends into the lagoon (as indicated in several figures	NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm r.gov.na	Noted - Text revised in Section 5.1.6 to address this comment.

No.	Chapter	Section	I&AP / Stakeholder Comment Received	Stakeholder details	Response / Clarification
19	Chapter 6: Environmental and social baseline	6.7	Ugab River appr. 1600km from Walvis Bay? Our entire coastline is about 1572km long...	NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm.r.gov.na	Thank you - This error has been corrected. Text revised in line with information from the MET.
20	Chapter 6: Environmental and social baseline	6.12.	An official statement by Namport on this should be included in the report as it is unlikely that two yacht harbors will be feasible. A feasibility study on the need of the marina should be included in the report. Where, for example does the number of 70 boats mentioned elsewhere in the report come from? This number should not just be mentioned but the studies leading to them should be included or at least referred to so the interested reader can read them	NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm.r.gov.na	Statement provided in letter from Namport included in Appendix D. See comment 15 above. 70 boats, this is the maximum number of boats the marina can cater for due to space constraints, and has been designed to accommodate.
21	Chapter 8: Assessment and Mitigation	8.1.2.4	Summary of employment impacts It is mentioned that an estimated 9900 could potentially migrate to Walvis Bay as a result of this development due to the creation of 5000 jobs. The impact on the community (changes to community cohesion) is rated as adverse low (1). The report, however, fails to acknowledge the additional pressure on schooling, housing etc. this will put on the social system in Walvis Bay, which is already severely under pressure. Hundreds of Grade	NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm.r.gov.na	These figures are correct; however, it has been made clear in the report that this is a worst-case scenario. Section 8.1.2.3 acknowledges the additional pressure on community services (third paragraph) and states that the demand on community services as a result of population increasing has not been considered in this assessment, it was assessed during the development of the IUSDF, which documents the population increase and thus development needed to support this, takes into consideration the increased demand and thus has plans for

No.	Chapter	Section	I&AP / Stakeholder Comment Received	Stakeholder details	Response / Clarification
			<p>1 pupils struggled to find a place in school this year. This will just get worse with additional families moving to Walvis Bay. These facts cannot be ignored when mentioning employment impacts. The significance of this negative impact is highly underrated.</p>		<p>community services.</p> <p>However, due to this sensitive concern, additional recognition to this potential impact has been recognised.</p>
22	Chapter 8: Assessment and Mitigation	8.1.21.1 Summary of impacts on water quality	<p>Table 34: The impact of the marina operation on the local community (foul smelling environment due to anoxic events) is rated as adverse low. If this includes the inner marina this impact is likely to be highly underrated as it has not been assessed in the ESIA.</p> <p>Algal blooms, anoxic muddy waters etc. are almost the norm already. In closed channels, where the water temperature is likely to increase this will just get worse and smellier, with a major impact on the local community.</p>	<p>NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm.r.gov.na</p>	<p>Table 34 – updated.</p> <p>During operations, maintenance dredging will occur, which will disturb the sea floor sediments. As discussed in Section 8.1.19 of the original ESIA report and the baseline chapter, sulphur eruptions are a normal occurrence in the Bay area, which can be exacerbated from the disturbance of sediments that have not been disturbed for some time. Bad odours have been included in the assessment. Furthermore, maintenance dredging will potentially improve conditions as stated in 8.1.19, as dredging will occur and thereby removing decomposed organic material (if present), which is the source of the trapped gasses leading to 'sulphur eruptions'.</p> <p>With regards to the inner marina, the design will be a concrete basin, which will be flushed and will include engineered methods, such as pumping to ensure the water is agitated, as described in the EMPs. Accumulation of sediment in the inner marina will be avoided - the floor will be free from sand or sediment and wildlife such as fish will be minimised. Therefore, algal blooms,</p>

No.	Chapter	Section	I&AP / Stakeholder Comment Received	Stakeholder details	Response / Clarification
					decomposition of invertebrates etc. are very unlikely to occur; therefore foul smells are not anticipated to be a risk. This is all discussed in the Project Description, which has been clarified in areas to ensure the information is clear for the reader.
23	Chapter 8: Assessment and Mitigation	8.1.32 Marine Mammals	<p>“Bottlenose dolphins are considered as medium value and sensitivity”. I disagree with this statement. They are highly valuable for the marine tourism industry and are highly sensitive due to their very low numbers (estimated to be less than 100 individuals, the lowest number of any mammal population in Namibia, according to the Namibian Dolphin project). Any negative impact on individuals of this small population has a potential impact on the population.</p>	<p>NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm.r.gov.na</p>	<p>Noted, however the Common Bottlenose Dolphin, whilst approximately 100 live in Walvis Bay, are a common Cetacea and found throughout the world. The uniqueness of this group has not been confirmed by biological data. These dolphins have been known to move north during the Phase 1 of the Namport Expansion Project, however it should be noted that the construction works for the proposed development in comparison is far less severe (temporarily and spatially).</p> <p>There are also various other dolphin species in the area, including a pod of over 500 Benguela (Heaviside's) Dolphin (all detailed in the Marine Mammal Report). All dolphins in the area are not considered as threatened internationally.</p> <p>In line with the methodology and identification of value and sensitivity, the Common Bottlenose Dolphin is considered as '<i>Of value, importance or rarity on a regional scale, and with limited potential for substitution; and/or moderate sensitivity to change, or moderate capacity to accommodate a change.</i>' This is driven mainly due to the value they place on the tourism industry (in Walvis Bay) and not the type of species and international protection status.</p> <p>The assessment concludes that there is potential to cause Adverse Moderate Significant Impacts which aligns to the definition</p>

No.	Chapter	Section	I&AP / Stakeholder Comment Received	Stakeholder details	Response / Clarification
					<p>described in Table 20.</p> <p>The assessment is considered to be robust and the findings provided by a marine mammal specialist.</p> <p>The Construction ESMP states regular monitoring will be undertaken for the duration of construction works and operations phase to minimise impacts. Additional measures may be enforced if the effects are considered to be greater than anticipated, which is considered unlikely.</p> <p>The Namibian Dolphin Project has independently reviewed the ESIA Report and agrees and concur with the findings as well as the proposed mitigation and monitoring measures.</p>
24	Chapter 8: Assessment and Mitigation	8.1.36 and 8.1.37 Noise impacts during construction and operation	<p>The cumulative impact of all noise in the harbor area (an important area for Bottlenose dolphins), even if temporary, is not taken into account.</p> <p>Another source of noise in the area, driving dolphins away from an important resting and feeding area (the lagoon) might increase stress levels to a point where negative effects on the population can be expected. The impact of another potential 70 boats in that small key area cannot be classified to be minor</p>	<p>NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm r.gov.na</p>	<p>The assessment presented in chapter 8 is the assessment of impacts of the proposed development on the existing environment, which includes existing noise sources (see sections 8.1.36 and 8.1.37). The combination of noise sources within the project is included in Table 37. The combination of noise sources from the proposed project and other projects and impacts on mammals was lacking and in response to this comment this issue was further investigated and assessed.</p> <p>The CIA has been revised and expanded where possible, in particular taking into consideration the future impacts of the Namport Expansion Project Phases 2 and 3.</p> <p>As stated in 8.1.37, the use of boats shall be for intermittent durations in localised restricted areas (this has been further defined in the project description). This impact on mammals has</p>

No.	Chapter	Section	I&AP / Stakeholder Comment Received	Stakeholder details	Response / Clarification
					<p>been assessed in line with the methodology as presented in Chapter 7, which has been developed from international best practice and the IFC guidance. The definition of a minor impacts is <i>"Impacts are considered to be important factors but are unlikely to be key decision-making factors. The impact will be experienced, but the impact magnitude is sufficiently small (with and without mitigation) and well within accepted standards, and/or the receptor is of low sensitivity/value. Impacts are considered to be short term, reversible and/or localized in extent."</i></p> <p>The Operations EMP provides mitigation measures that will further reduce the impact.</p>
25			<p>Stakeholder engagement: Minutes of meeting with MFMR at NatMIRC are missing. Many of the concerns raised at this meeting have not been addressed in the ESIA. Attendance register and minutes of meeting with NDP are missing. Minutes of meeting with Namport are missing.</p>	<p>NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm.r.gov.na</p>	<p>The inclusion of the meeting minutes referred to in the comment was an error and have been included in the updated Appendix D of the ESIA report.</p> <p>The meeting with the NDP was informal and therefore no minutes kept, however letter received from NDP regarding the topics discussed were presented in Appendix D.</p> <p>Minutes included in Appendix D of the ESIA Report.</p>
26			<p>Definitions and Abbreviations: Include an acronym MFMR for the Ministry of Fisheries and Marine Resources</p>	<p>NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm.r.gov.na</p>	<p>Noted thank you - has been addressed</p>

No.	Chapter	Section	I&AP / Stakeholder Comment Received	Stakeholder details	Response / Clarification
27		2.2 International Conventions:	Include Benguela Current Convention (BCC)	NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm.r.gov.na	Noted thank you - has been addressed
28		2.4 National Statutes:	Include the National Marine Pollution Contingency Plan (NMPCP, 2017)	NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm.r.gov.na	Noted thank you - has been addressed
29		General comment:	Numbering from Sub-section 3.2 onwards for the rest of the document should be corrected e.g. the next sub-section under 3.2 should be 3.2.1 and not 3.1.1	NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm.r.gov.na	Noted.
30		3.3 Monitoring and Auditing	Remove "Step 7" since it is already in 3.1.8 under Section 3.2. Will the proponent or Competent Authority (MET) appoint a Project Steering Committee (PSC) or an Environmental Management Committee (EMC) for the duration of the project to do the monitoring?	NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm.r.gov.na	The report has been revised. 3.3. Has been made a tertiary heading and altered to Step 8, as per the flow diagram. To be determined by the Competent Authority (MET) however all data from the project will be made publicly available and quarterly meetings with stakeholders will be held to report performance. This is detailed in the ESMPs.
31	4 Project Description	General	redo the numbering for this whole section – it is confusing / wrong	NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm	Noted. Unfortunately this formatting error can not be rectified.

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32	4 Project Description	4.1.18 Waste Management	<p>Marina Dredged Material: it is stated that approximately 78,000 m3 of dredged material and 22,500 m3 of on-shore excavated material, in total approximately 100,000 m3, will require disposal / relocation to the preferred disposal area of Industrial Zone 14. The average tipper truck has a load volume of about 20 m3 and therefor approximately 5,000 trips by these trucks will have to move from the project site to the proposed relocation site. There will be serious issues e.g. mud on the streets of town, dust, increased traffic and noise. I would propose that the dredged material should be dumped by the dredging vessel at the official NAMPORT dumpsite to the north of Pelican Point.</p>	<p>NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm r.gov.na</p>	<p>Opinion has been noted.</p> <p>The preferred method for construction dredging and the removal and relocation presents the least risk to the environment: dredging specialists and environmental specialists considered all options and came to this conclusion.</p> <p>The construction of a containment bund incorporated with the dredging methodology, eliminates potential risk to the marine environment coupled with a suitable economical solution that provides a positive utilisation of the dredged material. The concerns raised with regards to noise and dust are relevant and have been considered in identifying the preferred site for removal (information has been strengthened), and have been assessed in Sections 8.1.8.2</p>
33	4 Project Description	4.1.31 Waste Management	<p>Dredging (Under Section 4.10 Final Design and Operations): What are the estimated volumes of dredged material that will be produced during maintenance dredging?</p> <p>Not one of the four potential sites (Figure 13: A, B, C or D) for dredged material from 2 and 5 year maintenance dredging operations should be used to dump dredged material.</p> <p>The NAMPORT dumpsite to the north of Pelican Point should be used for this.</p>	<p>NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm r.gov.na</p>	<p>Opinion has been noted.</p> <p>A table illustrating the pros and cons of each option has been included, as well as additional information as to why a decision cannot be made at this stage (e.g. more data on volumes is required, which shall be compiled during the construction phase). Options refined (map amended) taking into considerations feedback from I&APs.</p>

No.	Chapter	Section	I&AP / Stakeholder Comment Received	Stakeholder details	Response / Clarification
34		6.1.8 History of Walvis Bay	The second paragraph states that “The Republic of Namibia became independent is 1978”. This is obvious disregard to Namibia’s Independence that was obtained on 21st March 1990.	NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm r.gov.na	Thank you - this was an error and has been corrected.
35		6.1.37.1 Turbidity	Also consult the work done by Geo Pollution Technologies Namibia for NAMPORT during the construction of the new Container Terminal Project. They have monitored turbidity and other relevant parameters since 2014.	NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm r.gov.na	As discussed in Section 6.6, the data was requested from Namport, however has not been made available for inclusion (after several requests) or use in the ESIA for the proposed development. Data has been obtained from the Municipality however no data has been provided for the period during Namport construction of phase 1.
36		6.1.38.3 Mammals, Fish & Invertebra tes	The first paragraph mentions “..a non-breeding colony of Cape fur seals.....are resident on the Peninsula”. Consult the MFMR Marine Mammal Section regarding this statement.	NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm r.gov.na	Confirmation with specialist confirms the available data states this to be the case. The term 'non-breeding' has been removed. In compliance with EMA ACT, the project has undertaken a robust consultation process, providing opportunities for stakeholders to provide feedback.
37		8.1.13 The Lagoon	The report states that “The Lagoon is used for commercial maricultural farms...”. The commercial maricultural farms are within the NAMPORT boundaries of the Aquaculture Production Area 1 and this is located in the bay area. One oyster farm is operating in the Walvis Bay Salt Pans.	NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm r.gov.na	Noted. Text corrected to reflect the Bay area.

No.	Chapter	Section	I&AP / Stakeholder Comment Received	Stakeholder details	Response / Clarification
38		8.1.16 Water Quality: Turbidity 7 Suspended Sediments:	The statement "...the biodiversity is limited to a few species that can tolerate the environment." Should be explained and verified with references. This is a very general statement.	NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm r.gov.na	Section 8.1.16 is the assessment which provides context to the baseline. A cross ref to Section 6.1.35.3 has been included where further information is provided on this statement. A reference has also been included in section 6.1.35.3.
39		8.1.17 Suspended Sediments: Constructi on	<p>A more detailed description of the "...gravel dredge pump system and vibratory piling techniques..." should be given in order for the reader to grasp exactly what is meant.</p> <p>Also refer to the concern on Section 4.1.18 on the volume of dredging material i.e. ± 100,000MT that will be produced and relocated to Industrial Zone 14. Will the dredged material be pumped directly onto the trucks or will it be stockpiled on the construction area to allow the water to drain from the dredged material?</p> <p>Will the same method be applied for the initial dredging during the construction phase and also during the following maintenance dredging after every 2nd and 5th year?</p>	NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm r.gov.na	<p>Information further detailing these methods has been included in section 4.1.11.6.</p> <p>The following text in Section 4.1.11.5 has been clarified - The dredged material will build-up in the construction bund, allowing excess water to flow out of the bund with the outgoing tide and back into the Bay area. Overflow pipes will be used where required. The dredged material will be removed from the bund using excavators and front-end-loaders, transferred to trucks waiting on land adjacent to the bund, and transported to Industrial Area Zone 14.</p> <p>Stockpiling will be minimised where possible across site during construction works.</p> <p>The dredging technique will differ during the operations phase. A bund will not be installed. The removal/transport technique shall depend on the location for re-siting the material, as discussed in Section 4.1.31.</p>

No.	Chapter	Section	I&AP / Stakeholder Comment Received	Stakeholder details	Response / Clarification
40		8.1.18 Suspended Sediments: Operations :	This matter should be discussed properly with the Namibian Mariculture Association and the shellfish farmers since it could negatively impact on their operations.	NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm r.gov.na	In compliance with the EMA ACT, the project has undertaken a robust consultation process, providing opportunities for stakeholder to register as an I&AP and voice their concerns / issues/ questions. The I&APs are encouraged to participate throughout the project and ongoing consultation shall occur throughout the phases of the project in accordance with the EMPs. To ensure these stakeholders have been consulted with, additional correspondence has been sent to make them aware of the project and seek their input.
41		8.1.20 Water Pollution:	The Department of Maritime Affairs (DMA) in the Ministry of Works and Transport should be consulted and informed. The National Marine Pollution Contingency Plan Operations Team should also be consulted and informed of this project and its possible impacts and risks	NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm r.gov.na	The MWT have been consulted with, and in fact help define the scope of this EIA. The National Marine Pollution Contingency Team has been consulted with for the project and will include ongoing consultation as part of the ESMPS.
42		8.1.21 Walvis Bay Wetland RAMSAR Site	Both the MET and the Benguela Current Convention (BCC) have responsibility for RAMSAR sites nationally and regionally and they should be consulted and informed.	NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm r.gov.na	Appendix D (of the ESIA report) provided formal letter correspondence between ECC and MET documenting the request for confirmation of competent authorities for the Ramsar site. According to the Ramsar Convention published documents for the Ramsar listed wetland, Section 27 identified the management authority resides with MET. This is further reiterated through the correspondence with MET, specifically, with Mr Holger Kolberg, an appointed custodian of the Ramsar site from the Ramsar convention which whom was consulted.

No.	Chapter	Section	I&AP / Stakeholder Comment Received	Stakeholder details	Response / Clarification
43	Cumulative Impacts	8.1.41.1 NAMPORT	Does the first sentence refer to the NAMPORT new Container Terminal Project?	NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm.r.gov.na	Correct. Consistency has been applied to referring to this project throughout the report.
44	9	9.6 Consultation Feedback and Next Steps	There was a meeting held between the proponent and the MFMR on 23rd June 2017 and there is evidence of that meeting in the form of an Attendance Register, however there is no report of the comments and input made by staff of the MFMR. This is a gross oversight.	NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm.r.gov.na	ECC can confirm that the feedback from the MFMR was certainly used and helpful throughout the compilation of the ESIA, it was an error on our behalf that the minutes were not included, the minutes have been added to Appendix D of the ESIA report.
45	Cumulative Impacts		<p>To begin with, the two component parts of the Walvis Bay Waterfront (NamPort/ Afrikuumba) still need to be considered together in an integrated and holistic way and as recommended by the IUSDF. In addition, the existing Pelican Bay Hotel, which is in the middle of both Waterfront proposals also needs to be given due consideration and attention.</p> <ul style="list-style-type: none"> • This still does not seem to be adequately covered in the E&SIA Report. • In the detail designs urban design consideration will need to be given to the creation of a sense of place, particularly the relationship between adjacent existing and proposed developments and the Waterfront development proposals. • I am pleased to note that the esplanade promenade still remains continuous through the Waterfront and becomes a real and important focal 	Bruce Stewart Stuart Planning, Town and Regional Planner bruce@sp.com.na 081 170 0960	<p>As discussed in Chapter 8, Section 8.10, The CIA considers reasonable foreseeable future / realistic projects. Whilst the Namport Waterfront Development project is widely known and local newspaper have reported a new hotel on erf 4941, these are not currently viewed as realistically defined and committed developments (through financial means or other), therefore have not been considered in the assessment due to the level of uncertainty (in line with IFC Guidance). Please see Response to comment 3 above.</p> <p>In addition to this, no information is available on these developments, therefore data required for the assessment would be guessing work at this stage, therefore not providing a robust and confident assessment of the proposed development.</p> <p>The Protea Hotel has been adequately considered and assessed as presented in Chapter 8.</p>

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			point. It is essential that the esplanade promenade remains continuous from Lovers Hill to the new NamPort Container Terminal.		Chapter 4 provides the project description with artistic impressions of the development and how it shall integrate with the surroundings. Thank you - opinion noted.
46			The development proposals indicate a significant total business floor area, including ±24,000m ² of retail space. <ul style="list-style-type: none"> This business space allocation (particularly retail and office) is not supported by a Market Research Study; there is no evidence base to support the total business floor area. 	Bruce Stewart Stuart Planning, Town and Regional Planner bruce@sp.com.na 081 170 0960	Need and desirability section updated to include findings of the market study
47			I am generally comfortable with the Traffic Impact Study. <ul style="list-style-type: none"> The closure of the Esplanade is definitely in support of the project, but not necessarily in terms of the wider public interest. Pedestrian and vehicular access to the Raft Restaurant and the Pelican Bay Hotel remain compromised even with the introduction of Waterfront Drive. In the detail designs urban design consideration will need to be given to pedestrian and vehicular access to all existing and proposed developments. Hopefully primary accessibility to the Waterfront via Fifth Road and Atlantic Street is possible. 	Bruce Stewart Stuart Planning, Town and Regional Planner bruce@sp.com.na 081 170 0960	Vehicle movement will alter as a result of the proposed project and changes to road layout, however this shall not significantly impact the access to these receptors. Thank you for your feedback – opinion noted. The primary access to the Waterfront via Fifth Road and Atlantic Street.

No.	Chapter	Section	I&AP / Stakeholder Comment Received	Stakeholder details	Response / Clarification
48			I am comfortable with the relocation/ reconstruction of the existing Municipal recreation facilities, which was a previous concern of mine.	Bruce Stewart Stuart Planning, Town and Regional Planner bruce@sp.com.na 081 170 0960	Thank you for your feedback – opinion noted.
49			I am comfortable with the Services Impact Study which was a previous concern of mine.	Bruce Stewart Stuart Planning, Town and Regional Planner bruce@sp.com.na 081 170 0960	Thank you for your feedback – opinion noted.
50			I am comfortable with the Hydrodynamic Modelling Report which was a previous concern of mine.	Bruce Stewart Stuart Planning, Town and Regional Planner bruce@sp.com.na 081 170 0960	Thank you for your feedback – opinion noted.
51			Finally, the E&SIA makes reference to the need for the Walvis Bay Council to undertake a SEA to identify the cumulative impacts of the IUSDF. As far as I am aware, and subject to confirmation by Council Officers, the IUSDF was subject to a SEA.	Bruce Stewart Stuart Planning, Town and Regional Planner bruce@sp.com.na 081 170 0960	Thank you for your feedback. Upon further investigation, it was confirmed that the IUSDF did undertake preliminary studies for a SEA to support the IUSDF. This has been reviewed by ECC following this feedback and recommendations updated accordingly. Indeed A SEA for the coastal areas of the Erongo and Kunene Regions has been undertaken (2007). All available information has been consulted with and incorporated into the ESIA.

No.	Chapter	Section	I&AP / Stakeholder Comment Received	Stakeholder details	Response / Clarification
52	4 Project Description		Claims that the construction of the breakwater wall will take approximately one month to construct are in the opinion of the owners, doubtful. Is there any kind of guarantee that it will only take this long?	Sarah The Raft Restaurant sarah@theraftrestaurant.com +264 64 204877	<p>The time period allocated for the construction of the breakwater wall is based on the input and advice from Mr Manfred Kloos the project Marine Engineer.</p> <p>Mr Kloos has extensive experience with marina construction project including piling and breakwater wall construction. Therefore, the timescale presented in section 8.1.3.1 is based on his professional experience.</p> <p>The construction schedule will be discussed and communicate clearly with the owners of the Raft prior to construction commencing.</p> <p>Should any unforeseen delays result in the construction taking longer than anticipated this would be communicated with the Raft owners.</p>
53	4 Project Description		Claims that the noisy activity of vibratory piling will take approximately two weeks is, in the opinion of the owners, doubtful. Is there any kind of guarantee that it will only take this long?	Sarah The Raft Restaurant sarah@theraftrestaurant.com +264 64 204877	<p>Vibratory pile driving is one of the quickest forms of piling driving. This method has been chosen to ensure that the impacts to the Raft and Dolphins are minimised in the shortest duration possible.</p> <p>The vibratory pile driving is anticipated to take 2 weeks; this is based on the advice and expert experience of Mr Manfred Kloos. Should unforeseen delays be experienced this will be communicated openly with the Raft restaurant.</p>
54	4 Project Description		The Raft Restaurant Structure & Integrity Who will pay for the further investigations into the integrity of the structure of The Raft?	Sarah The Raft Restaurant sarah@theraftrestaurant.com	The integrity study of the raft in its existing condition prior to any construction activity will be paid for by the proponent and will be conducted by an independent specialist.

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55	4 Project Description		<p>The owners are aware that there is maintenance work currently required on The Raft, however, since the Water Front project was proposed over two years ago in November 2015, they have been reluctant to invest in something that could be seriously impacted by construction works of the Water Front project, without some kind of guarantee that they would be compensated accordingly.</p> <p>What kind of guarantee would there be for compensation with regard to impact from the construction of The Waterfront development, on the structure and foundations of The Raft?</p>	Sarah The Raft Restaurant sarah@theraftrestaurant.com +264 64 204877	Should structural differences from that of the findings of the integrity study (completed prior to construction) be detected and attributed to the construction activities of the Waterfront, the developer would be liable for the costs.
56	4 Project Description		If the business is closed down due to safety requirements, what compensation would be guaranteed in terms of; loss of revenue, payment of wages, payment of overheads incurred during the closed period and loss of perishable stock etc.?	Sarah The Raft Restaurant sarah@theraftrestaurant.com +264 64 204877	As above.

No.	Chapter	Section	I&AP / Stakeholder Comment Received	Stakeholder details	Response / Clarification
57	4 Project Description		<p>The Raft Restaurant: Operation</p> <p>The report states that the access route will be 'slightly' longer.</p> <p>The current jetty is 40 metres long and is protected from the south westerly wind by the building itself for approximately 50% of that distance. Despite that customers complain about the distance they have to walk on a cold windy night</p> <p>According to the plans available, the new access route would be more than 3 times longer than that and would be completely exposed to the wind!</p> <p>What provision would be made for protection from the wind on the new (3 x longer!) access route?</p>	<p>Sarah</p> <p>The Raft Restaurant</p> <p>sarah@theraftrestaurant.com</p> <p>+264 64 204877</p>	<p>The concern is noted. The new access way to the Raft will be along the Marina wall. This solid structure will eliminate the risk of walking on a jetty at night that can sometimes be uneven or difficult to walk on.</p> <p>The new access route will be adequately lit, providing an inviting access to the Raft. The new access will lead customers into the restaurant and along the access way interpretation boards will be provided displaying the Rafts evolution over time to ensure this element of the brand is not lost, this was a concern raised by the Raft owners. The display boards and access way will be designed with the owners of the Raft.</p> <p>It is noted that 'slightly' longer is used to term this distance; the report will be amended to include distances. In addition the access to the raft will always be maintained and only once the new access is made will the old access way be removed.</p>
58	General	General	<p>It is envisaged that meetings between the owners and the developers will take up considerable amounts of time over the two and a half year period. Time that is currently being spent running the business.</p> <p>In this case it is expected that an additional Manager will need to be taken on to cover for the work currently carried out by the owners.</p> <p>What compensation will be provided to the owners in this regard?</p>	<p>Sarah</p> <p>The Raft Restaurant</p> <p>sarah@theraftrestaurant.com</p> <p>+264 64 204877</p>	<p>The period affecting the Raft most significantly is the marina construction (estimated 6 months) close consultation with the developer and owners is anticipated during this period.</p> <p>Consultation and agreements regarding construction schedules will be in place prior to construction commencing.</p> <p>Compensation for meetings is not anticipated.</p>

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59	8 - Assessment Findings	8.1.3.4	<p>The main concern of the owners has always been that the business would not survive the construction process and therefore fail to benefit in the long term.</p> <p>What guarantee of compensation will be given that the business will be supported throughout the construction process (two and a half years) and on into the recovery period, as it must also be taken into account that it will take a considerable time to build up the reputation of the business again?</p>	Sarah The Raft Restaurant sarah@theraftrestaurant.com +264 64 204877	<p>The Raft will be supported during the construction period to ensure impacts are minimised as far as reasonably practicable.</p> <p>It is noted that the most significant impacts to the Raft will be of a 6-month duration for the marina construction. However, at no point will the Raft not be able to operate during construction, access will always remain and mitigation measures have been put in place to reduce the impact to the Raft.</p> <p>The construction plan and methods to be used will allow continuous business operation of the Raft Restaurant. The impacts of the land-based construction will not adversely impact the Raft for the entire construction period of 2.5 years. Further the hours of construction are limited to daytime hours and therefore will not affect the night patrons of the Raft.</p>
60	General	General	<ul style="list-style-type: none"> The new 'route' for sewage would need to have some kind of substantial pumped system due to; the fall, distance and 'corners' involved. Who would be responsible for paying for the initial provision and installation, as well as the ongoing maintenance of such a system? 	Sarah The Raft Restaurant sarah@theraftrestaurant.com +264 64 204877	<p>All costs associated with the sewer relocation will be at the developer's expense.</p> <p>The new sewerage system will benefit the Raft and the Lagoon environment from the currently undersized sewerage system often resulting in backflows and spills.</p>
61	8 Assessment Findings	8.1.12.2	<ul style="list-style-type: none"> A complete exterior makeover of The Raft would be required to compliment the new surroundings so that The Raft does not look like a broken, rundown, neglected poor relation when compared to the brand new swanky environment that would surround us. <p>Currently the rustic appearance is part of the charm</p>	Sarah The Raft Restaurant sarah@theraftrestaurant.com +264 64 204877	<p>To be agreed with the developer prior to construction commencing.</p>

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			of Walvis Bay; The Municipality features 3 photos of The Raft on their website and for a long time had one on its home page.		
62	8 Assessment Findings	8.1.12.2	<ul style="list-style-type: none"> • Re-branding would be required as the appearance of The Raft from the land will change drastically and the library of beautiful photos that has been built up over the past 15 years and used for publicity and advertising would be essentially useless as they would not portray an up to date image and could thereby bring problems of misrepresentation. - Sunset photos from east with The Raft in silhouette - Photos from jetty - Flamingos in front of and around The Raft - Dolphins around Raft <p>Our current brand image which has been built up over 15 years will be completely nullified and there will be no alternative to offer until the project is completed.</p> <p>Who would pay for this re-branding?</p>	Sarah The Raft Restaurant sarah@theraftrestaurant.com +264 64 204877	Pictorial boards showing the Rafts evolution will be displayed along the access route leading to the Raft. Future branding and marketing costs will be the responsibility of the Raft business owners if they wish to do this.
63	8 Assessment Findings	8.1.3.1 - 8.1.3.4	<ul style="list-style-type: none"> • Retrenchments would be inevitable as business declined. <p>Who would pay the retrenchment costs?</p>	Sarah The Raft Restaurant sarah@theraftrestaurant.com +264 64 204877	Alternative business models could be investigated by the Raft including the possibility of supplying meals to the construction team. It has been noted that during such a project people often try and come to see what is happening on the construction site, an opportunity exists that there might be increased local patrons due

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					to this. It is not anticipated that the Raft will experience significant business decline that would lead to retrenchment of staff. Should damages to this effect be incurred the developer would be liable under Common Law.
64	8 Assessment Findings	8.1.3.1 - 8.1.3.4	<ul style="list-style-type: none"> The long term sustainability of the business with regards to the renewable lease on the land (seabed) and the concern that the developer may, at the time of renewal, present 'competition' and attempt to procure the lease on the land (seabed) by being in a position to offer the lessor a higher rent. What guarantee can be offered in this regard? 	Sarah The Raft Restaurant sarah@theraftrestaurant.com +264 64 204877	Commercial agreement to be entered into with the Raft prior to construction.
65	8 Assessment Findings	8.1.3.1 - 8.1.3.4	Over the past 12 years we have trained up staff to a high standard, to start all over again building a successful team would incur considerable additional money and valuable time. Who would pay for this?	Sarah The Raft Restaurant sarah@theraftrestaurant.com +264 64 204877	It is difficult to link staff turnover to a construction project; should staff leave to work for potential competitors in the new waterfront this is a factor beyond the developers control and therefore not considered a reasonable request. Should staff be retrenched as a result of the business having to close for a period due to construction activities (this is not anticipated) then these costs will be negotiated with the developer.
66	8 Assessment Findings	8.1.3.1 - 8.1.3.4	<ul style="list-style-type: none"> Having been in the hospitality business for 12 years now on a fulltime basis, the owners were planning to sell the business at some stage during the next couple of years. With the future of The Raft now in jeopardy, it will be impossible for them to convince any potential 	Sarah The Raft Restaurant sarah@theraftrestaurant.com +264 64 204877	The project timeframe and construction schedules are committed and therefore guaranteed.

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			<p>buyer of the potential value as there is no guarantee over how long the project will take or even worse no guarantee as to whether it will ever be completed.</p> <p>What compensation will be offered to the owners in this regard?</p>		
67	8 Assessment Findings	8.1.3.1 - 8.1.3.4	<ul style="list-style-type: none"> Staff morale will be hit by the uncertain future of The Raft and as a result we would risk losing staff members in whom we have invested time and money over the past 12 years and who have been loyal to us and hard working. <p>What compensation will be offered to the staff?</p>	Sarah The Raft Restaurant sarah@theraftrestaurant.com +264 64 204877	<p>It is difficult to link staff turnover to a construction project; should staff leave to work for potential competitors in the new waterfront this is a factor beyond the developers control and therefore not considered a reasonable request.</p> <p>Should staff be retrenched as a result of the business having to close for a period due to construction activities (this is not anticipated) then these costs will be negotiated with the developer.</p>
68	General	General	<p>1. We, Namundjebo United (Pty) Ltd, trading as Protea Hotel Pelican Bay, Walvis Bay, a subsidiary of United Africa Group (Pty) Ltd, object to the Environmental and Social Impact Assessment Report, dated January 2018 (“ESIA”) prepared by Environmental Compliance Consultancy. We record that we are the proprietor of, and own the land on which is situated, the Protea Hotel Pelican Bay, Walvis Bay.</p>	United Africa Group Willem Mouton willem@united.com.na	Noted

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69	General	General	<p>2. We have, despite a reasonable request for extension, prepared this objection within the limited time period provided, notwithstanding our rights to fair administrative process.</p> <p>As you well know, our commercial and other interests will be adversely affected to a severe degree should a decision be taken to issue an environmental clearance certificate for the Project. Consequently, we specifically record that we have not had an opportunity to address in detail certain of the legal and technical arguments and we strictly reserve our rights at this stage to amplify the contents of this objection should it become necessary to do so. Our objection is based on the following salient grounds.</p>	United Africa Group Willem Mouton willem@united.com.na	<p>A request for extension was received at the last minute by United Africa Group on Friday 2nd February 2018 (comment period closed on the 5th February). ECC granted an extension of time to the 7th February, which was considered fair and reasonable noting the points below.</p> <p>ECC issued the ESIA report for review for all I&AP who registered with the project including Mr Philip Young of Untied Africa Group (see Appendix D), and opportunities throughout the project to register have been openly available.</p> <p>Furthermore, ECC was advised that Mr Bruce Stewart, was the representative for the Protea Hotel, who attended the public meeting (see Appendix D, Section 4, Pg. 12 of the ESIA report), ECC confirmed with Mr Bruce Stewart that he had received the ESIA report for review and provided comments (see above comments).</p> <p>ECC also communicated to United Africa Group on the 2nd June, addressed to the Director of Hospitality, Gaming and Development, which is on page 26 of Appendix D of the ESIA Report (original documents issued on the 15th January).</p> <p>Conditions set out the EMA (2012) and associated regulations have been adhered to and complied with throughout the ESIA for the proposed project, as detailed in Chapter 9 of the ESIA Report and Appendix D (original documents).</p> <p>We do not take responsibility for the timely delivery of the ESIA report within the United Africa Group (Protea Hotel) who received access to the ESIA report on the 15th January 2018.</p>

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70	General	General	<p>3. The Constitution of the Republic of Namibia entrenches the rule of law and requires, inter alia, that all governmental decisions are made by officials acting fairly and reasonably and in compliance with the requirements imposed upon such bodies and officials, especially decisions in respect of government owned and sponsored projects. The ESIAR confirms that the Municipality of Walvis Bay (“MWB”), a shareholder in the project proponent, resolved as early as 2012 to designate the site on which the Project is to be developed for a marina or waterfront development. The location is therefore presented in the ESIAR as a fait accompli in contravention of the Environmental Management Act 7 of 2007 (“EMA”) read with its Environmental Impact Assessment Regulations (promulgated in Notice 30 of Government Gazette No. 4870 of 2011)(“EIA Regulations”).</p>	United Africa Group Willem Mouton willem@united.co m.na	Comment noted – refer to Appendix 1 of this Addendum addressing this allegation.
71	General	General	<p>4. This does violence to the principle of natural justice afforded to all interested and affected parties by abrogating their right to consider and respond to project site alternatives; and seriously maligns the independent exercise of the Environmental Commissioner’s discretion since the decision-maker is asked to disregard the advantageous potential of other possible site alternatives in favour of a pre-determined site, for narrow, commercially-driven reasons.</p>	United Africa Group Willem Mouton willem@united.co m.na	<p>Refer to appendix 1.</p> <p>The Walvis Bay IUSDF was funded by the European Union and was contracted out by the Municipality to Urban Dynamics Africa, an independent company. Sites were identified to develop tourism developments, and as discussed in Chapter 5 of the ESIA report (issued on the 15th January), two areas for Marine Development were identified (the Namport area and the area to the south of this).</p> <p>Around 2008, The Walvis Bay Municipality and Namport were</p>

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			<p>This is evident to other interested and affected parties too who have, as recorded in the register of comments in the ESIAR, themselves questioned the need and desirability of the Project and the lack of integrated planning resulting in fragmented environmental management.</p>		<p>looking at developing an area (<u>both</u> the 'northern' area owned by Namport and the 'southern' area owned by the municipality, however an agreement could not be met between the two parties. As illustrated in the Namport 2011/2012 Annual Report (their first annual report), Namport progressed with developing a marine development within their ownership boundaries. At the same time, Afrikuumba approached the Municipality with proposals to develop the southern site and continued engaging Namport with the proposal to progress both sites simultaneously. Limited responses from Namport were provided, and therefore to ensure development plans continue, the Municipality and Afrikuumba combined to form a Joint Venture, which formally established in December 2013 (shares certificate were issued January 2014). It should be noted, that in line with the Local Authorities Act, 1992 as amended, consultation and feedback from the community on the Public Private Partnership between the Municipality and Afrikuumba was obtained. The approved shareholding is 80% Afrikuumba and remaining 20% for the Municipality, the land owners. The report has been subsequently revised with this new information, and reference to a joint venture between Namport and the Municipality has been removed.</p> <p>The Namport proposals are still in the very early stages of development, with very little progression since 2012, for example, the tender process that started in 2014 to acquire developers to produce plans is still not complete.</p> <p>Namport is a state-owned enterprise, and therefore, the argument being made here would also be applicable for the 'northern' site</p>

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					<p>owned by Namport, the suitable alternative area.</p> <p>No other alternative sites were identified through the ESIA process that have not been identified in the IUSDF (which are all predetermined). Alternative sites in the IUSDF were reviewed, analysed and discounted for various reasons as discussed in Chapter 5.</p> <p>The I&APs have the opportunity to comment on the alternatives sites presented as part of the public participation process of the project.</p> <p>As discussed in Chapter 6, the projections for the town development justify the need for developments of this type of nature. It will support the increasing population, support the tourism industry as well as positively contribute to the local economy and reduce unemployment. Development is required to support the town's growth, and the proposed development offers an array of opportunities, services and facilities to accommodate this growth.</p> <p>With regards to the '<i>lack of integrated planning resulting in fragmented environmental management</i>', the proposed project is in line with the IUSDF, an approved document produced by a third party, which demonstrates integrated planning for the town of Walvis Bay. The ESIA is also in line with the Environmental Management Plan for Walvis Bay (also prepared independent from the municipality), which was prepared in 1998, prior to the IUSDF (which was approved in 2014). In 2008, the Walvis Bay Local Action Plan was issued, which aim was to make real progress</p>

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					<p>towards the sustainable environmental management of Walvis Bay and area in line with Local Agenda 21. There are various plans setting out the plans for the town and the ESIA report is compliant with; however, the comments on the fragmented approach is outside the scope of the proposed project and is therefore nullified.</p> <p>It should also be noted, that is up to the Municipality and the Government to control and manage developments in line with development frameworks, and ensure environmental, social and economic issues are managed, and developments are technically, economically and socially feasible, without causing detrimental effects to the local community, environment or economy.</p>
72	5	5.1.4	<p>5. It is not evidently clear what “sensitive commercial issues” motivated MWB to withdraw from the development of the existing harbour and “northern areas” as a tourist attraction but the Environmental Commissioner must take keen interest in the fact that a suitable alternative exists and that this alternative, situated further away from the lagoon and RAMSAR site, will form a natural adjunct to an existing development absent the need to turn a Public Open Space into a new development.</p> <p>The Environmental Commissioner will be duty-bound to consider the fact that Namport “intends to develop their area as a waterfront and marina development, and has set out plans in their</p>	<p>United Africa Group Willem Mouton willem@united.co m.na</p>	<p>As discussed in United Africa Group, comment 4. The text in the ESIA report has been revised to incorporate newly received information with regards to the history of the areas identified for marine development. The Alternatives Chapter has also been amended to reflect these changes.</p> <p>As stated in Chapter 8, the loss of open space has been assessed and is considered as a minor adverse impact, mainly justified by alternative open spaces in the area and the overall beneficial impacts the development will bring to the area.</p> <p>The Protea Hotel is sited adjacent to the site for the proposed development; at the Lagoon Mouth and boundary of the Ramsar Site. Whilst the impacts on both receptors have been assessed, the findings demonstrate that these impacts are manageable.</p> <p>The alternative site (Namport), as already mentioned by United</p>

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			<p>2014/2015 Annual Report (Namport, 2015)” and ought to heed the need for inter-governmental co-ordination and harmonisation of actions affecting the environment.</p> <p>The Environmental Commissioner can contribute to integrated environmental management in Walvis Bay by deferring his decision until an independent Strategic Environmental Assessment has been procured in order to consider the Project in its wider context which will promote sustainable development of the sensitive coastline of Walvis Bay rather than indulge surplus development.</p>		<p>Africa Group, is to be developed by Namport, therefore technically not a feasible alternative as both development sites are to be developed, in line with the IUSDF. The alternatives section has been revised to clarify this (see response to United Africa Group comment 4 for further explanation).</p> <p>As discussed in United Africa Group comment 4, an EMP for Walvis Bay has been produced, which the ESIA report is compliant with. An SEA for the coastal areas of the Erongo and Kunene Regions has also been produced, which the ESIA is complaint with. As detailed in Chapter 10, a recommendation has been made for the municipality to undertake a strategic cumulative impact assessment, a CIA to be undertaken for the Ramsar site and future EIAs to undertake CIAs. However, the proposed project should not be held up whilst waiting for this study to be completed as the findings of the CIA concluded that the impacts of this project combined with other projects would not result in additional significant impacts as identified through the ESIA. In other words, the nature and scale of the proposed project compared with other projects in the area, is considerably less significant. Not with standing this, it is recognised the proposed project does contribute to cumulative effects to a minor degree (as no project can go ahead without some impact), and therefore the recommendation was made. Note this should be undertaken prior to a project likely to cause significant impacts such as phase 2 & 3 of Namport container terminal.</p>

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73	5	5	<p>6. Mindful that the siting decision was made many years ago and that planning of the Project has been an ongoing process since then, the consideration of the socio-economic and environmental impacts associated with this decision appears to have been an after-thought, initiated as late as 2017, with interested and affected parties afforded a meaningless opportunity to consider the voluminous ESIAR and the attendant specialist studies. Given the severity of the impacts that the Project will have on our business, it is entirely unconscionable that we have been given a couple of weeks only to digest the ESIAR and its attachments, which we received mid-January. We accept that our consent is not required for the Project but we have a right to be consulted, and a reasonable opportunity to comment, which demands an earnest dialogue and not feigned concern for the “potential” impact which the Project may have on the “integrity” of our business.</p>		<p>Continuing on from the information provided in the response to United Africa Group comment 4:</p> <p>The development of a marine project was investigated approximately ten years ago; however, it has taken time to reach agreements between organisations. Therefore, the actual development of the proposed project commenced in 2014.</p> <p>Between January 2014 and the end of 2016, various tasks were undertaken, for example property rights and obtaining titles for transfer to the JV company and obtaining minister approval for the development. These administrative tasks and work on very early preliminary designs were time consuming. Once the proponent had all of the relevant paperwork, agreements etc. in place, the process to acquire an environmental consultancy commenced (November 2016). ECC were commissioned early 2017 and were directly involved with developing the design of the proposed project, and as documented in Chapter 5, has significant influence as various design elements were altered as a result of the input from specialists and the co-ordinators of the ESIA Team. Environmental and social impacts associated with the project are not considered as an afterthought, and in fact have been taken seriously and considered by the developer.</p> <p>A review of potential alternative sites for a marine development has been undertaken and presented in Chapter 5 of the original ESIA Report. No feasible alternatives were identified other than the proposed project site, taking into consideration the potential for Namport to develop their site (it is not committed, but is</p>

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					<p>documented).</p> <p>As stated previously, the duration specified in the EMA (2012) is a seven-day review period for I&APs. A 21-day period was provided for the proposed project to ensure I&APs had sufficient time to review and provide comments, ensuring that the participation process was meaningful. It should also be noted that the specialist studies were undertaken early on to ensure the findings could be used to aid the design development process and therefore reduce environmental and social impacts. The specialist studies were available on ECC's website from March 2017, and the specialists attended the public meeting held on the 12th June, as detailed in Appendix D of the original ESIA Report, and I&AP were encouraged to participate with the specialists.</p> <p>Please also see the response to United Africa Group comment 2 with regards to providing sufficient consultation with the Protea Hotel.</p>
74	9	9	<p>7. The Environmental Commissioner is reminded of the importance placed on the duty to consult with interested and affected parties and to facilitate public participation. This duty is placed both on Government and individual developers and is required in both Namibian law and international law. In terms of Namibian law, this duty is articulated in the Objects of the EMA (section 2(b)) and in the EIA Regulations (Regulation 21). The Additional Protocol to the Abidjan Convention Concerning Cooperation on the Protection and</p>	<p>United Africa Group Willem Mouton willem@united.com.na</p>	<p>Opinion noted – meaningful participation has been ongoing please refer to Chapter 9 and Appendix D for the public participation approach undertaken for the project. This approach is considered extensive and beyond in country requirements and is aligned to IFC.</p> <p>Consultation with Mr George Tshatumbu (Deputy Director Legal and International Maritime Matters Ministry of Works and Transport) the appointed National Focal Point in Ratified Countries for the Abidjan Convention confirmed the Convention has been Ratified into Namibian legislation therefore based on the fact that</p>

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			<p>Development of Marine and Coastal Environment from Land-Based Sources and Activities in the Western, Central and Southern African Region (the “Additional Protocol”), which Namibia has ratified, envisages facilitating public access to the “widest possible extent” to relevant data and information concerning pollution and degradation on the Protocol area from land-based sources and activities.</p> <p>1 Article 6(3) requires participation in the process of taking important decisions to protect marine and coastal environment.</p> <p>Article 6(5) goes further, envisaging that Member States facilitate public access to legal and administrative processes with regard to compensating members of the public who suffered damages as a result of lack of access to information and non-participation in the decision making processes.</p>		<p>the proponent has committed to compiling with all National Laws they will by default also be compiling with the intentions set out in the convention as they are addressed in National Law. However, for completeness this convention has been included in table 4.</p> <p>The points identified by Africa United in the Convention relate to public participation which has been completed in accordance with the EMA Act of 2007 plus additional consultation as described in responses above.</p>
75	8	8.1.1.3 8.1.3	<p>8. It is insightful that the ESIAR consoles itself by relegating the fate of our business to “moderately adverse” only because the “free market” deems it acceptable.</p> <p>The ESIAR conspicuously fails to sufficiently record all of our meetings with the Project proponent’s environmental assessment practitioner and the developer, the minutes thereto, and the comments we have recorded to date.</p> <p>On the ESIAR’s own version, further consultation</p>	<p>United Africa Group Willem Mouton willem@united.com.na</p>	<p>The assessment has followed the methodology set out in Chapter 7. The receptor (the Protea Hotel and revenue) is considered as a Low sensitive/value receptor (<i>Of value, on a local scale and has considerable capacity to accommodate a change</i>), and with a moderate magnitude of change, this results in a minor adverse impact: impacts considered to be important factors but are unlikely to be key decision-making factors.</p> <p>A meeting between Philip Young and ECC was held on the 2nd June 2017. ECC's notes from this meeting are included in Appendix D of the ESIA. This is the only meeting with the ESIA</p>

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			with us would be required, and we would submit that that is indeed a reasonable concession.		<p>team, we welcome copies of meeting minutes and comments you have recorded to date to ensure our records are complete. All written comments received from the Protea / United Africa Group have indeed been considered in the ESIA report.</p> <p>Consultation is a continuous process through the ESIA and will continue beyond the submission of the ESIA report to MET. Further consultation has been identified and shall be undertaken, however this will not affect the conclusions of the ESIA Report.</p>
76	8	8.9	<p>9. The Environmental Commissioner will be encouraged to consider the fact that the environment may well be adversely affected by unneeded, and thus unsustainable developments, such as the Project, and that, therefore, the cumulative effect of the Project must be addressed also with regard to socio-economic considerations.² The Project proposals suggest a total business floor area of some magnitude, including ±24,000m² of retail space. Interested and affected parties have rightly questioned the need for this volume of retail space and the apparent absence of any market research study in support of thereof.</p>	<p>United Africa Group Willem Mouton willem@united.co m.na</p>	<p>The motivation and need for the project has been addressed in the response to United Africa Group comment 4.</p> <p>As stated in Chapter 10, taking into consideration the total potential adverse impacts of the proposed project and the benefits that could be felt, on balance, the benefits of the project outweigh the negatives. There is a strong need for the project (support economic development (job creation, increase tourism sector, increase competition, grow downstream markets), reduce unemployment, provide housing for an increasing population and promote local produce and services). All developments affect the environment, society and the economy, however this project promotes sustainable development through sustainable design measures, best practice and mitigation measures, which are clearly stated in the project description. The mitigation measures detailed in the EMPs with further reduce impacts.</p>

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77	General	General	<p>10. The principle of integration of environmental protection and socio-economic development is fundamental to the concept of sustainable development, as contemplated in the Namibian Constitution and the EMA.</p> <p>The Environmental Commissioner ought not to rely solely on MWB's consideration of the need and desirability of the Project, which MWB has a commercial interest in, but should also independently consider what the socio- economic implications of the Project will be.</p> <p>We are not suggesting that our interests be weighed separately, but we do submit that when the socio-economic impacts of all of the interested and affected parties, who have signalled their discontent and opposition to the Project, are weighed with the potential impacts on the Walvis Bay receiving environment, the scale of a sustainable development tips, we submit, away from the economic developmental sustainability advocated for in the ESIAR.</p>	United Africa Group Willem Mouton willem@united.co m.na	<p>As part of the establishment of a Public Private Partnership, the Ministry of Regional and Local Government, Housing and Rural Development have been consulted with, and the necessary approvals obtained. In addition, the Ministry of Fisheries and Marine Resources has been consulted with as an I&AP as well as the Ministry of Environment and Tourism. The Ministry of Environment and Tourism will be receiving the ESIA report as part of the ECC application. Therefore, the Government is already fully aware of the project, who will be mindful of the need of the project.</p> <p>As Stated in Table 6, the proposed project is a development that forms part of the bigger picture of achieving economic progress, social progression, social transformation and environmental sustainability as set out in the Fifth National Development Plan and Vision 2030. Not progressing with the development (non-development discussed in section 5.2) will not support Walvis Bay achieving the targets set out in the 5th NDP. The 5th NDP sets out objectives to improve infrastructure and diversify products so that tourism targets can be achieved. In Walvis Bay, there are currently no other formal committed developments similar to the proposed project which will support achieving the Government targets.</p> <p>The basis of the last comment is formulated on comments cited in the ESIA report (Chapter 9) that were formed based on preliminary information that was presented in the BID and presentations provided by specialists at the public meeting held in June 2017. Based on the limited number of concerns raised during the public review period (15th January - 5th February) of the ESIA report and the number of comments received, it demonstrates that the initial</p>

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					concerns have been adequately addressed as illustrated in Chapter 9, table 39. Subsequently, the final assessment findings demonstrate that the benefits outweigh the adverse impacts, and therefore the scale of sustainable development does not <i>'tip away from economic developmental sustainability'</i> .
78	4	4	11. We draw the Environmental Commissioner's attention to the fact that the ESIAR confirms that the waste to be generated by the Project construction phase will be disposed of at "Industrial Zone 14" but to date no environmental clearance certificate has been issued for such a waste disposal site and the Environmental Commissioner cannot be party to any decision which would lead to a contravention of the Namibian environmental law.	United Africa Group Willem Mouton willem@united.co m.na	<p>To correct the facts stated in this comment:</p> <ul style="list-style-type: none"> - Construction waste will be generated as a result of site preparation and construction activities, as described in Section 4.1.19 of the original ESIA report. This waste will not be disposed of to Industrial Zone 14, it will be disposed of to a suitable disposal site which will be identified in the EMP and Waste Management Plan prior to construction works commencing. - Dredged and excavated ground material will arise during construction works. This ground material will be transferred to Industrial Zone 14 for use as part of the town's development (filling of land to allow development to occur, as identified in the IUSDF), as discussed in 4.1.18. <p>The material is not classified as waste, rather a resource. Nevertheless this land reclamation technique is commonly used in Walvis Bay to support development in the Town. The approval for the activity is considered as part of this ESIA.</p>
79	General	General	12. If the unreasonable period provided to interested and affected parties to consider the ESIAR and specialist studies was not an indicator of prior design, then the Project proponent's belief in the inevitable issuance of an environmental clearance certificate must be manifested in its blatant	United Africa Group Willem Mouton willem@united.co m.na	<p>As detailed in previous comments, the public participation process for the proposed project has gone over and above the requirements stipulated in the EMA (2012) and associated Regulations.</p> <p>An initial application to the Office of the Environmental</p>

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			<p>disregard for the provisions of the EIA Regulations. There is no power and no discretion to exclude the obligation to prepare a scoping report and to subject that scoping report to public participation.</p> <p>In terms of Regulation 7 of the EIA Regulations, a project proponent “must” prepare a scoping report and “must” give all interested and affected parties an opportunity to comment on the scoping report. This is a preemptory provision of the EIA Regulations and failure to comply therewith must render the process followed by the Project proponent to date procedurally, fatally flawed and for this reason alone, the Environmental Commissioner ought to reject the Project application.</p> <p>It therefore comes as no surprise that the ESIAR readily commends itself on being the subject of a proposed peer review but no interested and affected party will benefit from such an independent external review since nowhere is any undertaking given to extend the public participation process for this purpose.</p>		<p>Commissioner was made explaining the proposed project.</p> <p>The response from the Environmental Commissioner (with feedback on the scope of the assessment included from the Ministry of Fisheries and Marine Resources and Ministry of Works and Transport) is included in Appendix C of the original ESIA Report. The scope provided by the regulating authority clearly states that a full EIA for the proposed project should commence. This was attributed to the clear understanding that a detailed assessment is required, which is one of the aims for the scoping process to identify. Therefore, in line with the Environmental Commissioner's instructions, a full EIA was undertaken.</p> <p>To ensure the public had sufficient time to conduct their review, the review period was allocated a 21 day period, rather than a seven day period, as required by the Act.</p> <p>Mr Peter Tarr, who undertook the Peer review was issued the ESIA report for review, at the same time as the I&APs, as documented on the email issued by ECC. Therefore, this comment is not deemed reasonable, as the I&APs could have also brought in peer reviewers (Which ECC understands Untied Africa Group did do, through the appointment of ENS Africa)</p>

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80	2	2	<p>13. The proposed project is to take place on both a RAMSAR site (wetland of international importance) and protected coastline area. The area has received special attention from both the Namibian Government and the international community. Developments at the site must comply with the Convention on Wetlands of International Importance Especially as Waterfowl Habitat (“RAMSAR Convention”), the Abidjan Convention for Co-operation in the Protection and Development of the Marine and Coastal environment of the West and Central African Region (the “Abidjan Convention”) and the Additional Protocol. Namibia has also formulated a Draft Policy on its Wetlands.</p>	United Africa Group Willem Mouton willem@united.co m.na	<p>Comment noted.</p> <p>The Abidjan Convention for Co-operation in the Protection and Development of the Marine and Coastal environment of the West and Central African Region (the “Abidjan Convention”) and the Additional Protocol has been included in to table 4 of the revised ESIA report, with a statement made describing how the proposed development has applied this Convention.</p> <p>ECC spoke directly to Mr. Auene (Deputy Director, Maritime Pollution Control and Search and Rescue for the Ministry of Works and Transport, who also sits under the Benguela Current Commission) and Mr Tshatumbu (Deputy Director, Legal and International Maritime Matters Ministry Works and Transport, and the nominated person for Namibia of the Convention). It was confirmed that Namibian Legislation addresses the majority of the requirements outlined in the Convention, so based on that fact, the proponent commits to complying with the intentions set out in the Convention as stipulated in Chapter 2.</p>
81	Appendix H	Appendix H	<p>14. It is not clear whether the undated Avian Impact Assessment Report accompanying the ESIAR was made available to the RAMSAR Secretariat.</p> <p>The ESIAR includes correspondence to and from the said Secretariat during May 2017 and suggests that there would have been guidance provided by the Secretariat after the Standing Committee meeting scheduled for June 2017 but there is no evidence that its input was further solicited or that this ESIAR</p>	United Africa Group Willem Mouton willem@united.co m.na	<p>Noted. The undated report has been revised to include a date.</p> <p>In Appendix D, page 43, the email referred to in the comment (14), is dated May 24th, 2017 from Paul Ouedraogo at Ramsar to Ms Jessica Mooney. In response to the comment, please refer to the email included on page 44, dated 29th May 2017 between Ms Jessica Mooney and Mr. Kenneth Uiseb, which clearly states that a meeting was being held between Ms Jessica Mooney and Mr. Holger Kolberg on the 29th May 2017. At the meeting, a project update was provided, which included an invitation to the Public</p>

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			<p>and its specialist study was made available to it for comment.</p>		<p>Meeting. The Scoping Letter from the Environmental Commissioner (Appendix C of the ESIA Report) and the draft Avian Study Report (Appendix H) were presented to Mr. Kolberg, who had no additional comments or concerns as there are no concerns with regards to the Ramsar site. Mr. Kolberg agrees that the proposed project will not impact the integrity of the Ramsar site.</p> <p>Neither Mr. Kolberg or Mr. Useb could attend the public meeting, no further feedback or communications received from Ramsar between this time and when the ESIA report was issued to them.</p> <p>The Avian report, as part of the ESIA report was issued to Ramsar as a registered I&AP and key stakeholder. No further comments have been provided by Ramsar (Namibian or International), as per Appendix 2 to this addendum, which also states they are happy for the Walvis Bay Waterfront development to proceed as it will not affect the integrity of the Ramsar site.</p>

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82	Appendix H	Appendix H	<p>15. The Avian Impact Assessment Report soberly concedes that the “lagoon environment itself...is the cause of...avian declines” and that the likely impetus for this unfortunate state of affairs is anthropogenic. This report recommends therefore that any additional impacts must be strictly minimised to reduce any additional impacts.</p> <p>This is what the Project proponent’s own specialist concluded and it is of much consequence given the RAMSAR status of the Walvis Bay wetland (the most important marine wetland in southern Africa) and lagoon in which the Project will be developed. Mindful of the existing marine traffic emanating from the harbour and the yacht club, the Avian Impact Assessment Report finds that any further increase in watercraft traffic in an out of the lagoon may dissuade sensitive species to continue roosting in the lagoon as is already evident from the statistics cited in the report.</p> <p>The Avian Impact Assessment Report also expressed concern regarding the “obvious” sedimentation from the Raft restaurant and that this combined with the port expansion “appears to already be reducing bird numbers”. The report called for “research to determine the long- term effects” of this existing negative impact which any further development within the lagoon area is likely to exacerbate by increasing “salinization and dying of this</p>	United Africa Group Willem Mouton willem@united.co m.na	<p>Clarification from Dr. Rob Simmons (avian specialist) has been received - he stated that by far the biggest issue in the biological dying of the Lagoon is as a result of the Namport Expansion Project, which jeopardises the integrity of the Lagoon. The proposed project is highly unlikely to cause significant impacts on the Lagoon when considering the nature of the development and the anti-pollution and sedimentation management measures. In addition to this, both Dr. Rob Simmons and Mr. Holger Kolberg confirm the integrity of the Ramsar site will not be affected by this project the Walvis Bay Waterfront (see Appendix 2, email from Mr. Holger Kolberg).</p> <p>Marine traffic from Namport does not enter the Lagoon, and strict control over motorboats from the Yacht Club or other users are enforced, however it is acknowledged that some boats do enter the Lagoon and there is currently a lack of control.</p> <p>As stated in 8.1.29 motorised boats will be limited to the entry and exit points of the marina and will not be permitted to enter the Lagoon. To ensure this is clear, a statement has been included in the revised ESIA report. It is stated in 8.1.29, the increase in baseline of motorboats in the Lagoon is considered minor as strict controls shall be enforced, as included in the ESMPs. Therefore, the conclusions of the assessment remain, as it is unlikely that the integrity of the Ramsar site will be compromised due to birds altering their roosting location .</p> <p>With regards to the quote “appears to already be reducing bird numbers’, this has been taken out of context. The statement in the report is as follows: "Sedimentation is obvious from the Raft</p>

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			<p>biologically and internationally renowned wetland".</p> <p>The Project proponent was obliged to consider the impact of the Project on Walvis Bay's RAMSAR designated wetland and no doubt relied on the Avian Impact Assessment Report for this purpose, but the Avian Impact Assessment Report suggests that further research still needs to be conducted.</p>		<p>restaurant [and] from Google images, and this in combination with the port expansion appears to already be reducing bird numbers. So, this is a high priority to get right." This is a comment in relation to the long-term impacts that arising from the Namport Expansion Project. On page 15, the sedimentation impacts from dredging from the proposed project will result in " low-medium impact with low-medium significance with medium term effects. With mitigation can be reduces to low/acceptable levels." There is uncertainty as to what the long-term impacts are on the bird life as a result of the impacts from the Namport Expansion Project, and therefore further research should be undertaken to determine the overall effects - not just as a result of the proposed project. The original ESIA report makes a recommendation for a strategic CIA to be undertaken. Due to the text being taken out of context, this comment is nullified.</p> <p>The assessment for the Ramsar site has relied on various sources of information, including the Avian Study. The Avian Study provides a recommendation of further research. This is based on the following: Bird monitoring has been undertaken for the last 35 years by Dr. Rob Simmons (Avian specialist), Mr. Holger Kolberg (Ramsar) and Mr. Peter Bridgeford (Avian specialist) and will continue for the foreseeable future. The suggestion for further research is as a result of the unknown long-term impacts on the bird life from current operations, namely Namport. The continuous research is to track the populations of birds to understand the dynamics, types of species and numbers of individuals, which would feed into other national and international studies as well as databases.</p>

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					<p>The data from this monitoring is used in assessments such as the ESIA for the proposed project. Future monitoring, as per the recommendation, will provide further data, which will be used to check the assessment findings and monitor the potential real impacts of the development. It is unlikely that the development will cause significant impacts as a result of the change in the environment, however to provide confidence and commitment, and recognition that the bird life is the primary reason for the Ramsar site and is a key attraction for tourists, a commitment to further monitoring has been made. This commitment has been included in the Construction and Operations EMP and associated Monitoring Plans, and as stated in the conclusion, an Environmental Clearance Certificate could be issued, on condition that the management and mitigation measures in the ESMP are adhered to.</p>
83	8	8.7	<p>16. The Avian Impact Assessment, by its inherent nature, would not consider the impact of the Project on the wetland ecology generally and therefore such an assessment is a noteworthy deficiency in the ESIAR.</p> <p>The objective of the RAMSAR status declaration is to limit human intervention and exploitation. The Project will not qualify as promoting such an objective.</p> <p>We submit that impacts that are even moderate should not be allowed in a RAMSAR site as</p>	<p>United Africa Group Willem Mouton willem@united.com.na</p>	<p>The Avian Impact Assessment is one of three specialist reports, which support the assessment of the marine ecology assessment, which includes the wetland ecology. Information from all three reports has been considered and presented in the ESIA to determine the impacts on the marine environment. Not one of these reports can be solely relied upon to assess the impacts on the wetland ecology as there are various components and interdependencies that contribute to the wetland ecology. Therefore, the assessment presented in Chapter 8 is considered to be comprehensive and approved by qualified and experienced specialists. In addition, it should be noted that birds are excellent indicator species of the health of any ecosystem because they are top predators. The avian assessment was undertaken by a</p>

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			significant as the one in Walvis Bay.		<p>competent and qualified avian specialist, who has confirmed that with the implementation of all anti-pollution and sedimentation management measures, the proposed development would have low and minor impacts on the bird life.</p> <p>The statement that the “objective of Ramsar status declaration to limit human intervention and exploration” is incorrect. No such objective for Ramsar exists under the convention. The Ramsar Convention’s mission is “the conservation and wise use of all wetlands through local and national actions and international cooperation, as a contribution towards achieving sustainable development throughout the world”. Under the “three pillars” of the Convention, the Contracting Parties commit to:</p> <ol style="list-style-type: none"> 1. Work towards the wise use of all their wetlands; 2. Designate suitable wetlands for the list of Wetlands of International Importance (the “Ramsar List”) and ensure their effective management; 3. Cooperate internationally on transboundary wetlands, shared wetland systems and shared species. <p>As stated in section 2.2 of the original ESIA report, under International Conventions table 4, the proposed marina portion of the project is partly sited within the area of a Ramsar designated site, and therefore the development proposals, ESIA and ESMP have followed Ramsar guidelines and are in accordance with the Site’s Integrated Management Plan. This is confirmed by Mr Holger Kolberg of MET, the nominated custodian and responsible person for the RAMSAR site (see Appendix 2).</p> <p>The last comment is not substantiated; no justification as to why a</p>

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					moderate impact should not be allowed in a Ramsar site. No response provided due to lack of substantiation.
84	8	8.1.33	<p>17. The development of the marina threatens the only ocean access point to the lagoon.</p> <p>The human–marine mammal conflict will be high as an impact.</p> <p>Pollution at this point will affect the entire lagoon and will be significant.</p> <p>The time allowed is insufficient for detailed evaluation of specialist reports.</p>	United Africa Group Willem Mouton willem@united.co m.na	<p>As stated in 8.1.33, the access channel to the Lagoon will be dredged resulting easier access to the Lagoon for marine mammals, thereby providing long term beneficial impacts.</p> <p>The construction and operations of the proposed development and any boats operating in the marine environment will be subject to measures to avoid pollution entering the marine environment, as set out in the ESMPs. Potential pollution from normal operations has been assessed and findings provided in Chapter 8 of the ESIA. With the implementation of the measures set out in the ESMPs, it is likely that no significant impact will occur, and extremely unlikely that pollution would significantly affect the entire Lagoon.</p> <p>The last comment has been responded to in previous responses.</p>
85	8	8.1.3.5 - 8.1.3.8	<p>18. Our property is on a down gradient from the new development. Consequently, the developers must ensure that what used to be absorbing the land is now replaced with a hard surface. Inadequate drainage design increases the risk of our property being flooded, which could have a major impact on us.</p> <p>Presently, there is scant detail in the ESIAR regarding such risks and not enough attention has been given to our concerns.</p>	United Africa Group Willem Mouton willem@united.co m.na	<p>Suitable drainage during the construction stage shall be installed to ensure any surface run off does not flow on to neighbouring properties. Clarification in Section 4.1.11.4 has been made and suitable measures have been included in the Construction EMP. As discussed in Section 4.1.29 of the original ESIA report, a drainage design for the development will be installed. The final drainage design shall ensure that any rain water (which is minimal in Walvis Bay - see baseline chapter) will be collected and discharged appropriately and shall not run-off and flow onto adjacent sites. A part of the Operations ESMP, this drainage will be checked regularly to ensure any surface runoff and subsequent</p>

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					impacts on neighbouring properties is avoided.
86	8	Various	<p>19. The ESIAR notes that maintenance dredging will be required. This activity will have a major impact on the lagoon.</p> <p>The site where the dredged material will be deposited has not yet been decided (see 4.1.31 in the ESIAR) and dredging mitigation measures have not been thoroughly investigated. This indifferent approach towards crucial details is alarming.</p> <p>Furthermore, Sulphur related release during dredging is an important human health concern which is not addressed.</p> <p>The impacts of dredging are also noted in the ESIAR to impact the structure of the Raft and note is made of further study needed. No such further study is available.</p>	United Africa Group Willem Mouton willem@united.co m.na	<p>Sections 8.1.18 and 8.1.19 provide the findings of the assessment of maintenance dredging and potential impacts on water quality and thus the Lagoon. The comment refers to a major impact, when in fact the assessment concludes the impact will be low adverse and not major (through applying the adopted methodology in accordance with IFC). No substantiation of the 'major impact' comment.</p> <p>The location to move the dredged material has not been identified, as further information is required to be able to determine the best options. A preferred option will be identified once more data has been collected through the construction phase. The preferred option shall be identified prior to maintenance dredging taking place, which has been emphasised in the ESMPs. To provide further context, a table of pros and cons of each potential option has been provided in section 5.5.</p> <p>Dredging mitigation measures are set out Section 4.1.11.5 and included in the assessment findings chapter specific to the impact discussed, as well as the C-EMP. Additional information has been included in section 4.1.11.5 to ensure methods are clearly understood.</p> <p>As discussed in Section 8.1.19 of the original ESIA report and the baseline chapter, sulphur eruptions are a normal occurrence in the Bay area, which can be exacerbated from the disturbance of sediments that have not been disturbed for some time. It is currently not seen as a health concern in the Walvis Bay area, but</p>

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					<p>can lead to bad odours; therefore this comment is not applicable. Bad odours have been included in the assessment. Furthermore, maintenance dredging will potentially improve conditions as stated in 8.1.19, as dredging will occur regularly thereby removing decomposed organic material which is the source of the trapped gasses leading to 'sulphur eruptions'.</p> <p>As with other recommendations in the ESIA, the requirements of an integrity investigation have been included in the relevant ESMP. With regards to this recommendation, the Construction ESMP clearly states that a survey of the Raft structure shall be undertaken prior to construction works. The Conclusion states that an <i>Environmental Clearance Certificate could be issued, on condition that the management and mitigation measures in the ESMP are adhered to.</i> Therefore, the survey is a prerequisite to the construction works and shall be made part of the conditions on the grant of the clearance certificate. To minimise confusion over recommendations made in the report, a summary table shall be provided in the Conclusion chapter.</p>

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87	8	8.1.14 & 8.1.15	<p>20. The marina will cut off 50m of the 130m channel feeding the lagoon or 38% of the lagoon access flow. It must be a significant impact.</p> <p>The flow dynamic modelling is not shown or discussed in the report.</p> <p>Sea water circulation through the marina is not possible in the design, so the marina will become a stagnant pool of very low quality water with associated disease and smells.</p> <p>Existing flow and sedimentation modelling for the Namport area has been conducted by WSP Coastal which considers the yacht basin and development proposed by Namport. It is unclear whether the proponent considers the combined impacts of Namport development and the project.</p> <p>It is unclear why an unrelated and locally inexperienced modeler is called into this. The modelling does not appear to reflect the structural engineering information and is considered poorly coordinated with site proposals.</p>	United Africa Group Willem Mouton willem@united.co m.na	<p>The planned marina breakwater is located in the present shallows which partly run dry during low tide. The envisaged breakwater is landward of the present Raft restaurant location and is more than 100m away from the existing main channel, so it will not cut off any part of the channel (refer to Fig. 1-3 of the report). The effects of the breakwater and access channel to the marina on the tidal flow are considered negligible. A blockage of the tidal flow, if at all, may be expected rather in the order of 1% and are also reflected in the modelling results (38% are rated as completely unfounded).</p> <p>Section 6.1.33 details the Oceanography and Hydrodynamics of the receiving environment.</p> <p>The design of the marina will provide for the provisions of constant water circulation (natural and engineered controls) to promote water circulation mitigating the risk of stagnant water. This is discussed in Section 5.4. The Inner marina will be flushed as a when required, as stated in Section 5.4. These measures will be refined further during operations to ensure these risks do not occur.</p> <p>Several meetings have been held with Namport, and the reports stated in this comment have not been provided by Namport. It is also unclear as to which Namport development is referred to in this comment: the proposed non-committed waterfront or the Namport Container Terminal (under development). Either way, both are discussed in the CIA. The CIA has been amended taking on board comments from I&APs.</p> <p>The comment regarding the '<i>unrelated and locally inexperienced</i></p>

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					<i>modeller'</i> is unacceptable and unfounded. DMC has been active in Walvis Bay since 2009. DMC key personnel, as also involved in this study for the Walvis Bay Waterfront, has visited Walvis Bay including lagoon and Peninsula several times, amongst others in close cooperation with experts from the environmental division of CSIR. The senior coastal engineer involved in the numerical modelling has been in Walvis Bay several times for another project in 2007/2008. The modelling has been performed adopting the engineering and bathymetric information provided. His CV has been attached as Appendix 3 of this Addendum report.
88	8	8.3	<p>21. The developers failed to conduct a comprehensive climate change impact assessment.</p> <p>Presently, climate change is only dealt with in a small section in the ESIAR in 6.1.31 and on the table titled "summary of impacts not assessed as being significant" on page 127.</p> <p>In light of present jurisprudence in South Africa, especially the Earthlife Africa Johannesburg v Minister of Environmental Affairs and Others (2017) 2 All SA 519 (GP) case, climate change impact assessments are a necessary part of environmental impact assessments. The court held that "the injunction to consider any pollution, environmental impacts or environmental degradation logically expects considerations of climate change" (para 78). Although this case dealt with a coal-fired power</p>	<p>United Africa Group Willem Mouton willem@united.com.na</p>	<p>As stated in the Methodology Chapter, the ESIA has been undertaken to identify all potential significant impacts that may occur as a result of the proposed project. The report presents the impacts which are considered as significant or those sensitive to the local community.</p> <p>This ensures that the report is concise and focuses on the key issues (which is considered as international best practice).</p> <p>Climate change including global warming and sea level rise is triggered by emission of CO2 and other greenhouse gases. It is more than obvious that a coal-fired power station has an entirely different impact than a marina. In particular close to the Walvis Bay City, with industrial developments, port operations and individual traffic, the effects of a leisure marina on greenhouse gases are indeed irrelevant.</p> <p>It is a common engineering approach to consider the potential effect of sea level rise for the design of marine facilities (freeboard,</p>

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			station, it is submitted that the findings of the court remain relevant.		overtopping etc.). With rising water levels, the bottom friction of the tidal flow is reduced which can be concluded to have a rather positive effect on the exchange of water between Lagoon and Walvis Bay.
89	8	8.3	<p>22. If one has regard to the National Policy on Climate Change for Namibia, it is evident that Namibia is vulnerable to climate change. The policy notes that high sea level rise may inundate coastal towns including Walvis Bay, which is Namibia's only deep water harbor.</p> <p>These statements are made without considering the Waterfront development's contribution to climate change. The development will contribute to climate change both in the short and long term. The need for a climate change impact assessment as well as climate change mitigation measures is aggravated by the environmental significance of the site in question, being both a RAMSAR site and marine and coastal environment.</p>	United Africa Group Willem Mouton willem@united.com.na	<p>The National Policy on Climate Change for Namibia has been included into section 2.4. A cross reference to this in Section 6.1.31 has been included to ensure the concern on climate change is evident.</p> <p>The Municipality has undertaken climate change modelling and the results conclude that the sea level will likely rise by 20cm by 2100. The number used as best practice is 100cm by 2100, which is detailed in Chapter 6. The floor is generally +4mMSL as the design has taken into consideration the potential sea level rise - discussed further in response 88.</p> <p>As discussed in the response to response 88, the proposed project has implemented measures to reduce any contributions to climate change and the justification for not requiring a separate climate change study is also detailed.</p>
90	8	8.3 & 8.9	<p>23. As acknowledged in the ESIAR, a rapid cumulative impact assessment ("CIA") was undertaken. Such a multifaceted and impactful project requires a comprehensive CIA to be undertaken. The present approach ridicules the value in the required and important CIA process.</p>	United Africa Group Willem Mouton willem@united.com.na	Please refer to the response to comment 3.
91	Appendix G	Appendix	24. Traffic impact of the future operation of the new	United Africa Group	The EIA for the Namport Expansion Terminal is limited and data for

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	& 8	G & 8.1.5.3	<p>container terminal through the south gate does not feature clearly. This will be a huge factor to the access route proposed.</p> <p>The closure of the Esplanade is in support of the project, but not necessarily in terms of the wider public interest. Access to the Raft Restaurant and Protea Hotel Pelican Bay, Walvis Bay remain compromised even with the introduction of Waterfront Drive.</p> <p>The proponent does not consider concurrent plans of adjacent sites. Development cannot be considered in isolation of Namport development. The Traffic Impact Assessment is incomplete.</p>	<p>Willem Mouton willem@united.co m.na</p>	<p>each phase of works. Where data is available, it has been used to model scenarios for the future traffic volumes in the area. This is demonstrated in Appendix G (see scenario 7 & 10). Due to the lack of data and understanding surrounding cumulative impacts in particular the Namport impacts, recommendations have been refined and are presented in the Conclusion Chapter.</p> <p>Access to both properties will remain at all times but shall alter. The Protea Hotel has two access points, one of which will be closed but replaced by Waterfront Drive. The assessment undertaken by a traffic and transport specialist, concludes (Section 8.1.5.3) that the change to access arrangements shall not result in a significant affect (rated Low) to either the Raft or the Protea hotel. The comment is unfounded as there is no explanation as to why Walvis Bay would be compromised by a small section of road being close and an alternative route provides.</p> <p>The last comment does not provide details or references of the '<i>plans on adjacent sites</i>'. As discussed in numerous responses to the comments provided by United Africa Group, data from Namport, the key developer in the area, is limited for Phase 2 and 3. The traffic assessment has used available data from the Namport EIA and applied assumptions where there are gaps. The last statement is also unfounded as modelling scenarios have included estimates of potential traffic movements from the Namport terminal (Scenario 7 & 10). Namport will have to prepare a detailed transport study before future plans of the Namport Site can be finalised, which is part of the recommendation presented in the Conclusion.</p>

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92	2	2	25. Finally, the Environmental Commissioner must note that the ESIAR fails to mention the developer's obligations imposed by the Abidjan Convention and Additional Protocol. Both agreements have been in force since April 2017. Article 144 of the Namibian Constitution provides that "unless otherwise provided by this Constitution or Act of Parliament, the general rules of public international law and international agreements binding upon Namibia under this Constitution shall form part of the law of Namibia."	United Africa Group Willem Mouton willem@united.com.na	<p>As confirmed with the Ministry of Works and Transport, the Namibian legislation addresses the majority of the requirements outlined in the Abidjan Convention; as the convention has been ratified by Namibia. By virtue, the proponent states it full intentions to comply with all relevant laws, international protocols and policies as demonstrated in the signed deceleration by the Proponent representatives figure 2.</p> <p>For completeness, the legal table provided in section 2.2 table 4 has been updated to include the Abidjan convention and the commitment that the proponent will comply with the convention.</p>
93	General	General	26. Having had regard to the ESIAR, we therefore object to the Project on a variety of grounds, as mentioned above and which include, environmental, socio-economic and economic grounds as well as the lack of meaningful participation. We respectfully request the Environmental Commissioner to unreservedly consider all of our objections and to reject the Project by refusing to issue an environmental clearance certificate based on the abovementioned grounds.	United Africa Group Willem Mouton willem@united.com.na	<p>The I&AP has the right to express their opinion and objection.</p> <p>Meaningful participation has been provided as per evidence supplied in Chapter 9 and Appendix D. The public participation process is in accordance with the EMA (2012) and goes over and above the requirements.</p> <p>The Environmental Commissioner must unreservedly consider all aspects of the proposed project including environmental, socio-economic and economic grounds.</p>

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COMMENTS RELATING TO THE ESMPS					
94	CESMP		<p>Construction:</p> <p>During construction (esp. dredging) regular (at least every two weeks) sampling of water quality should be done in the lagoon, not just turbidity but also heavy metals (especially Cadmium) which might be released from the sediments.</p>	<p>NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm.r.gov.na</p>	Addressed in the monitoring plan.
95	CESMP		<p>Construction:</p> <p>Avian monitoring should be described in more detail. What type of monitoring is meant?</p>	<p>NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm.r.gov.na</p>	Included in C-ESMP
96	CESMP		<p>Construction:</p> <p>Ref No 12: Any water discharged into marine environment must adhere to accepted water quality standards.</p>	<p>NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm.r.gov.na</p>	Inserted
97	DESMP		<p>Decommissioning:</p> <p>“The project has a life span, which is yet to be finalised. It is assumed that at a certain point, the development will require decommissioning and the site will be reinstated back to its original or similar condition.” Is this really the case for a development</p>	<p>NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm.r.gov.na</p>	This is correct. The development will be maintained and refurbished where required to try and extend the life span, and therefore the end point is not currently known at this stage. A reinstatement / decommissioning plan shall be developed prior to the project entering this stage.

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			of this type?		
98	CESMP		Appendix A1: C-ESMP: 3.3.2 Other Stakeholders – correct the name of our ministry to Ministry of Fisheries and Marine Resource	NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm r.gov.na	Error – amended throughout
99	OESMP		Appendix A2: O-ESMP: 5.4.1 Dredging Activities – add a new bullet point to read “Provide early notice to the Namibian Mariculture Association and to all the commercial shellfish farmers in Walvis Bay.”	NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm r.gov.na	Included in the O-ESMP
100	OESMP		5.4.2 Canal Maintenance – change the 4th bullet to read “Sample and analyse to water to ensure....”	NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm r.gov.na	Included in the O-ESMP

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101	OESMP		5.6 Waste Management: Dredged Material: Dredged material should be dumped at the official NAMPORT dump site north of Pelican Point	NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm r.gov.na	Not included, please refer to ESIA report sections 4.1.18, 4.1.32 and 5.5
102	OESMP		5.9 Pollution and Contingency Plan: Conform to the National Marine Pollution Contingency Plan (NMPCP), 2017 and work closely with the NMPCP Operations Team.	NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm r.gov.na	Addressed in the ESIA report refer to section 2.4
103	OESMP		5.12 Environmental Emergency And Response Contacts: The Operations Manager of the project should work closely with the Department of Maritime Affairs in the Ministry of Works and Transport	NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm r.gov.na	MWT will be consulted as a key stakeholder

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105	DESMP		<p>Appendix A3: D-ESMP: It seems as if this Appendix was initially drafted for the Otjikoto Gold Mine.</p> <p>2.1 Decommissioning and Site Reinstatement Objectives: In this section the report states that “The project has a lifespan, which is yet to be finalised. It is assumed that at a certain point, the development will require decommissioning and the site will be reinstated back to its original or similar condition”.</p> <p>Does this mean that the waterfront and the whole development will be decommissioned after a number of years?</p> <p>This is conflicting to the ESIA Report which states in Section 4.1.24 that “The Walvis Bay Waterfront will be a permanent feature of the town of Walvis Bay”</p>	<p>NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm.r.gov.na</p>	<p>The ESMP were drafted for Walvis Bay Waterfront - unsure of the basis of this comment.</p> <p>Section 3.2.3 (Scope) explains why decommissioning is not included in the assessment and the ESMP states the same thing.</p>
COMMENTS RELATING TO THE ESIA APPENDICES					
106	Appendix D		<p>Appendix D: Stakeholder Engagement: 5. Ministry of Fisheries and Marine Resources: This section lists the attendance register of a project meeting on 23rd June 2017 between the proponent and the MFMR, but there are no minutes of that meeting, and also no record of the questions, queries and concerns raised by the MFMR staff depicted in this Appendix</p>	<p>NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm.r.gov.na</p>	<p>Minutes included in appendix D of the ESIA report</p>

No.	Chapter	Section	I&AP / Stakeholder Comment Received	Stakeholder details	Response / Clarification
			D.		
107	Appendix I		Appendix I: Hydrodynamic Impact Assessment Study As far as I know Delta Marine Consultants did this study or a similar study with the CSIR. It would be good if the graphs in this study report can be extended to show the bathymetry and the hydrodynamics up to a point north of Pelican Point to indicate these parameters for the Bay area. (See Figure 3-2)	NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm r.gov.na	All available data has been incorporated into the study with DMC were relevant and available.
108	Appendix J		Marine Mammal study: This report is unnecessary long and includes a lot of information not relevant for this ESIA. The report should focus on the impact of the proposed development on the marine mammals that are likely to occur in the area only. It is extremely tiring and tedious to find the information relevant for the development in the report. The report does not need to be more than 30 pages (like the Avian impact assessment, which is concise and to the point). Page 6: "The quota for the annual cull, sanctioned by the Namibian government, is based on the status of fish stocks." This statement is wrong!! Further is seal harvesting not done as population control but it is sustainable harvesting of a resource. The chemical oceanography is hidden in the marine	NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm r.gov.na	The Marine Mammal Study Report was produced at the early stages of the project and thus included information that is not applicable to the final design. The scope of the study was to provide sufficient information to aid the development of the design of the project, and therefore has a large amount of information contained in the report. The information was then used to undertake the detailed EIA. This report will not be updated. The assessment of impacts in the ESIA report has been revised taking into consideration these comments, however the overall conclusions of the assessment has not altered.

No.	Chapter	Section	I&AP / Stakeholder Comment Received	Stakeholder details	Response / Clarification
			<p>mammal specialist study and not described clearly with clear reference to the proposed development (which, according to the artist's impression, promises clean water for swimming and white beaches).</p> <p>While it is true that a potential positive aspect of dredging is the release of nutrients into the water column which can increase productivity, in the affected area in the lagoon this might actually be a negative aspect as it can lead to even more algal blooms and oxygen depletion. The aspect of algal blooms and low oxygen waters in the lagoon should be described clearly in relation to the proposed development.</p> <p>During dredging and construction free access by dolphins to the lagoon is blocked. Even though this might be temporary it might have a huge negative impact as the lagoon is an important feeding and resting area. Data should be presented on how frequently the dolphins utilize the lagoon and how the even temporary loss of this area will affect the dolphins? Is the use of the lagoon by the dolphins seasonal?</p>		

No.	Chapter	Section	I&AP / Stakeholder Comment Received	Stakeholder details	Response / Clarification
109	Appendix K1 and K2		Appendix K1 and K2 Any explanation of these diagrams?	NatMIRC staff members Anja Kreiner Anja.Kreiner@mfm r.gov.na	These are the height and sun studies conducted by the developer to ensure the project minimise potential impacts to neighbouring residents.

APPENDIX 1 – FORMAL LETTER RESPONSE TO I&AP COMMENT FROM WALVIS BAY MUNICIPALITY



Municipality of Walvis Bay

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Ms J Mooney
Environmental Practitioner and Consultant
Environmental Compliance Consultancy
P O Box 91193
Windhoek
Namibia

Enquiries	Z Job
Phone	+264 (0)64 201 3201
Fax	+264 (0)64 200 525
Cell	+264 81 124 0345
E-mail	zjob@walvisbaycc.org.na
Date	8 February 2018

For attention: Ms Jessica Mooney

Dear Ms Mooney,

Walvis Bay Waterfront Development Project – Response to Comments from an I&AP Ref. No. 15/2/1/1/2/1

I refer to the comments received from an Interested & Affected Party (I&AP) on matters relating to the Walvis Bay Waterfront Development Project, with specific reference to the Socio Economic Impacts, and wish to officially respond as follows:

The municipal Council of Walvis Bay entered into a Joint Venture Agreement for the establishment of a Waterfront Development Project in Walvis Bay in terms of and as provided for under the Joint Business Venture Regulations (Refer to Government Gazette No. 3864 dated 27 June 2007 attached hereto as **Annexure "A"**). Regulation 2 of the said Joint Business Venture Regulations sets out the authority for a Local Authority to enter into Joint Business Ventures with public and/ or private entities.

The contribution of the Walvis Bay Council to the Joint Business Venture was and is limited to the Immovable Properties where the waterfront development will be constructed.

It should be emphasized that the municipal Council of Walvis Bay has 20% shareholding in the Joint Business Venture (JBV), which is relatively higher than the percentage of their actual contribution (Immovable Properties) towards the development project. In addition, the Council of Walvis Bay, having a minority shareholding, has the majority Board representation in the JBV. Therefore, the interests of Council is very well represented In the JBV.

As a matter of fact, before entering into the JBV, all documentation relating to the JBV, including the JBV Agreement, were referred to the Attorney-General for scrutiny, comments and inputs which were eventually incorporated in the final Agreement for signing by both parties. These documents were also made available to the public for their scrutiny, comments and inputs and for transparency purposes.

I wish to state on record that the resources exposure and/or contribution from the Council of Walvis Bay for the development of the Waterfront Project is limited to the Immovable Properties – no further commitments, financially or otherwise, have been or will be made to the Project.



On the contrary, the Socio Economic Impacts in as far as Council is concerned, could be summarized as follows:

- The development will contribute immensely towards job creation opportunities during and after construction periods;
- Due to the nature of the development, i.e. waterfront, we can positively anticipate a growth in our local and international tourism sector performance as the development will attract investors of both local and international origin;
- The Council of Walvis Bay will directly benefit from future profits, rates & taxes income and expansion of service delivery to the development. These profits and income would be utilized to address challenges faced by Council including, and not limited to, land and housing developments for the middle and low income groups.
- Our risk exposure is to a large extent limited to our contribution in Immovable Properties which at the same time serves as protection towards any future risks as Immovable Property appreciates over time as opposed to depreciation in case of Movable Properties.
- Outright selling of Immovable Properties has the advantage of immediate access to liquidity/ cash however, regular access to financial resources through earnings from future income streams is rather a secure form of sustainability and financial independence.
- The formation of a JBV involving Council should be seen as a strategic approach in embracing the private sector to complement the efforts of public entities in introducing, implementing and operating efficient and sustainable service delivery initiatives/ projects.

We are aware of the economic slowdown currently being experienced locally and globally and would therefore embrace any support from both the public and private sectors to join forces in making noticeable contributions that will ultimately complement our efforts in addressing development in our Local Authority Area in particular and our country at large.

It is our wish and strong believe that the Waterfront Development Project is a good example of a key economic and social development project that will ultimately make our dream a reality in our endeavours to achieve prosperity and promote economic growth in our port city.

Yours sincerely,


M Haingura
Chief Executive Officer



GOVERNMENT GAZETTE
OF THE
REPUBLIC OF NAMIBIA

N\$2.00

WINDHOEK - 27 June 2007

No. 3864

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**MINISTRY OF REGIONAL AND LOCAL GOVERNMENT, HOUSING
AND RURAL DEVELOPMENT**

No. 113

2007

**AMENDMENT OF COMMERCIALISATION REGULATIONS:
LOCAL AUTHORITIES ACT, 1992**

The Minister has, under section 94A of the Local Authorities Act, 1992 (Act No. 23 of 1992), amended the Commercialisation Regulations promulgated under Government Notice No. 39 of 2001 as set out in the Schedule.

SCHEDULE

The regulations are amended by the insertion after regulation 2 of the following regulation:

“Commercialisation of electricity supply and distribution”

2A. (1) Subject to these regulations or to any other law, a local authority council may commercialise in whole or in part, with the written approval of the Minister and subject to such conditions as the Minister may impose, together with the regional council, a local authority council and private sector participation, electricity supply and distribution carried out by the local authority council.

(2) In the conditions imposed under subregulation (1), the Minister may authorise a commercialised business inclusive of operating within the local authority area of another local authority and a settlement area”.

MINISTRY OF REGIONAL AND LOCAL GOVERNMENT, HOUSING AND RURAL DEVELOPMENT

No. 114

2007

**JOINT BUSINESS VENTURE REGULATIONS:
LOCAL AUTHORITIES ACT, 1992**

The Minister of Regional and Local Government, Housing and Rural Development has, under section 94A of the Local Authorities Act, 1992 (Act No. 23 of 1992),

- (a) made the regulations set out in the Schedule; and
- (b) repealed the Joint Business Venture Regulations published under Government Notice No. 40 of 5 March 2001.

SCHEDULE

Definitions

1. In these regulations, unless the context otherwise indicates, any word or expression defined in the Act has a corresponding meaning, and -

“director” means a director of the board of directors of a joint business venture company or a director nominated by and representing a local authority council who may be a staff member of the local authority council or any other person with appropriate and relevant knowledge, expertise and experience;

“Government” includes a Ministry, a regional council, a local authority, a parastatal and a non-governmental organisation;

“joint business venture” means a joint business venture entered into in accordance with regulation 2;

“joint business venture company” means a joint business venture established under regulation 2, which takes the form of a company in terms of regulation 3(a);

“joint business venture trust” means a joint business venture established under regulation 2 and which takes the form of a trust in terms of regulation 3(b);

“pool” means the contribution made at any time by a local authority council to a joint business venture by way of -

- (a) the provision of labour or other services free of charge;
- (b) the supply of materials or equipment;
- (c) a disposal of assets, subject to section 30(1)(s) and (t) of the Act;
- (d) the assignment of incorporeal rights, real rights and personal rights;
- (e) the transfer of all necessary and relevant permits, authorisations, consents and licences;
- (f) the making of a cash payment;
- (g) the provision of a loan;
- (h) the entering into a lease agreement; and
- (i) the furnishing of a guarantee in terms of section 30(1)(x) of the Act;

“the Act” means the Local Authorities Act, 1992 (Act No. 23 of 1992).

Entering into joint business venture by local authority council

2. (1) A local authority council may, for the purposes of exercising, performing or carrying out its powers, functions or duties in terms of the Act, and subject to -

- (a) subregulation (2);
- (b) these regulations; and
- (c) the prior written approval of the Minister on such conditions as the Minister may impose,

enter into a joint business venture with the Government, whether for profit or non-profit purposes, or any company or any trust, or co-jointly with the Government and any company or any trust, in order to provide directly or indirectly for the advancement of persons within the Republic of Namibia who have been socially, economically or educationally disadvantaged by past discriminatory laws or to promote economic development and employment creation within its area or in order to supplement its funds referred to in section 80(1) of the Act.

(2) The Minister may impose conditions under subregulation (1) which apply-

- (a) to a local authority council specified in the approval granted under that subregulation;
- (b) in general to all local authorities in respect of any joint business venture under these regulations;
- (c) only to the joint business venture and only to the local authority council specified in the approval granted under that subregulation; or

- (d) to the payment by a joint business venture to a local authority council of such amounts as may be or may become due and payable by the local authority council to a third party lender, financier or other creditor in terms of a written and binding agreement which pertains wholly or partially to activities to be undertaken by the joint business venture or to any assets, materials or equipment pooled by the local authority council in the joint business venture.
- (3) The Minister may grant, if foreign nationals will be involved in any joint business venture, his or her approval under subregulation (1) only after consultation with the Minister of Finance and the Minister of Trade and Industry.
- (4) The written approval of the Minister under subregulation (1) is not required in the case of the municipal council of a municipality referred to in Part 1 of Schedule 1 of the Act.

Form of joint business venture

3. A local authority council, when entering into a joint business venture under regulation 2 may -
- (a) take up shares in an existing company registered, or in a company to be registered, in terms of the Companies' Act, 1973 (Act No. 61 of 1973); or
 - (b) accept the position of beneficiary of the trust established; or
 - (c) enter into an agreement with the Government relating to the joint business venture,

for the purpose of establishing the joint business venture.

Alienation, encumbrance or disposal of shares and assets, and pooling of resources, services and property

4. A local authority council -
- (a) excluding the municipal council of a municipality referred to in Part 1 of Schedule 1 to the Act, may not alienate or encumber any shares owned by it in a joint business venture, or otherwise encumber or dispose of its assets or other interest therein, without the prior written approval of the Minister, subject to the conditions the Minister may impose in the approval, granted after consultation with the Minister of Trade and Industry, which approval must specify the purchaser or the beneficiary, as the case may be, and the relevant shares or assets, as the case may be;
 - (b) may, subject to the conditions imposed by the Minister under regulation 2, pool in a joint business venture.

Acquisition of shares or other interest in joint business venture by staff members of local authority council

5. No member or staff member of a local authority council or any person referred to in section 94A(1)(c)(iv) of the Act, may buy, accept, receive or otherwise acquire any shares or other interest in a joint business venture, excluding payments relating

to director's fees, or payment for services rendered with the written approval of the local authority council.

Representation of local authority council on board of directors or board of trustees

6. The representation of a local authority council on the board of directors of a joint business venture company, or on the board of trustees of a joint business venture trust, in relation to the total representation on the board concerned, must be commensurate to the ratio of the number of shares held by a local authority or local authorities jointly to the total number of shares issued in the joint business venture.

Amendment or alteration of articles of association and memorandum, trust deed, share or interest structure or nature of operation of joint business venture

7. The memorandum and articles of association of a joint business venture company or the trust deed of a joint business venture trust must provide that, irrespective of the voting power of the local authority council as a shareholder at a general meeting of such company or at any meeting of the trustees of such a trust, as the case may be, the memorandum or articles of association or the trust deed may not be amended and the share or interest structure altered, including the transfer of ownership in shares, or the nature of the operations of the relevant joint business venture changed, including the risks pertaining thereto, without -

- (a) a majority vote in favour of such amendment or alteration, by the shareholders at a general meeting of such company or by the trustees at a meeting of the board of trustees of such a trust of not less than 75% of the votes exercisable by the shareholders or trustees as the case may be who are present and entitled to vote at such a meeting; and
- (b) the prior approval of the Minister, which approval must be entered into the minutes of the joint business venture concerned.

Audit of accounting records and financial statements of joint business venture

8. (1) The Auditor-General must audit, with the necessary changes under section 85 of the Act, the accounting records and financial statements of a joint business venture.

(2) The joint business venture referred to in subregulation (1) must submit to the Minister and to the local authority concerned copies of the audited accounting records and financial statements referred to in that subregulation, together with a report by the Auditor-General relating to the audit conducted under that subregulation, within a period of 30 days after the completion of such audit.

Staff members of local authority council not to be employed by joint business venture

9. (1) A joint business venture entered into under regulation 2, other than a joint business venture company, may not employ a staff member of a local authority council.

(2) Nothing in subregulation (1) prevents a staff member of a local authority council to resign from such local authority in order to take up employment with a joint business venture referred to in that subregulation.

General

10. Nothing in these regulations prevents a local authority council from entering into a joint business venture under regulation 2 for the purposes of conducting a joint business venture with objectives, powers, functions or purposes which are identical or similar to, or which are in competition or in conflict with, the objectives, powers, functions or purposes of any of the local authority council's own operations, if the joint business venture may serve to improve the efficiency or effectiveness of any of the own operations of the local authority council.

Transitional provisions

11. (1) A joint business venture established pursuant to the repealed regulations is deemed as being established under these regulations.

(2) Anything done pursuant to the repealed regulations is deemed as being done under these regulations.

APPENDIX 2 – EMAIL FROM RAMSAR

Subject: Re: RAMSAR Comment Confirmation

Date: Friday, 9 February 2018 at 8:37:25 am Central Africa Time

From: Holger Kolberg <holgerk@afol.com.na>

To: Jessica - Environmental Compliance Consultancy <jessica@eccenvironmental.com>

Hi Jessica

You have it spot on!

Regards

Holger

On 2018/02/08 14:51, Jessica - Environmental Compliance Consultancy wrote:

Dear Holger,

Thank you for your time on the phone a moment ago.

As discussed, we received a comment from an I&AP that "The objective of the RAMSAR status declaration is to limit human intervention and exploitation".

Our research has never identified this as an objective of RAMSAR.

The mission of RAMSAR is "the conservation and wise use of all wetlands through local and national actions and international cooperation, as a contribution towards achieving sustainable development throughout the world"

As we discussed over the phone, development can proceed providing it does not cause such impacts that the status/integrity of the wetland changes as a result of the project. Just because the site is listed as a RAMSAR site it does not prohibit human intervention.

Once again thank you for taking the time to review the ESIA and for your feedback that you are satisfied with the report and the mitigation measures in place to prevent harm to the RAMSAR site.

We will continue to liaise with you, RAMSAR, and Peter Bidgeford as the project progresses.

Can you please confirm I have interpreted our conversation and conclusions correctly?

Many thanks and kind regards,

Jessica

--

Jessica Mooney

Environmental Practitioner and Consultant

Tel +264 81 653 1214 | Windhoek | Namibia

Email jessica@eccenvironmental.com



www.eccenvironmental.com

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Windhoek
Namibia

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www.avast.com

APPENDIX 3 – BERGMANN HENDRIK DMC CV



Curriculum Vitae

Personal

Name: Bergmann, Hendrik
Date of birth: 14.04.1962
Nationality: German



Education

<u>Year</u>	<u>Education</u>
2000	Doctor's Degree (Dr.-Ing.) in the field of Coastal Engineering at the Technical University of Brunswick
1992	Dipl.-Ing., Civil Engineering at the Technical University of Brunswick
1990	Stay abroad and Practical Experience at the Fluid Mechanics Laboratory (Prof. John Fenton), School of Engineering, Auckland, New Zealand

Special Courses

<u>Year</u>	<u>Courses</u>
2013	Mike 21 Training on 2D Hydrodynamic and Wave Modelling (Flexible Mesh)
2013	Hydraulic Fill Manual – dredging and reclamation works - PAO Introduction on CUR handbook
2011	Mike 21 Training 2D Hydrodynamic Modelling (Flexible Mesh)
2004	“Design of Embankment and Bottom Safety at Inland Waterways”, BAW-Colloquium. Hanover/ Germany
2004	“Soil and Bottom Stability – Considerations on the Interface between Geotechnical and Hydraulic Engineering“, BAW-Workshop, Karlsruhe/ Germany

Key Qualifications

Senior coastal engineer and project manager for engineering applications and design coordination. Shore protection and breakwater designs, wave-structure interactions and wave damping, hydrodynamic modelling, marina planning, sediment dynamics and river hydraulics, multidisciplinary projects involving environmental, architectural and landscaping aspects.

Professional affiliations

Hafenbautechnische Gesellschaft e.V. (HTG), Hamburg/ (Society for Harbour Engineering Inc.)
Ingenieurkammer Niedersachsen/ (Chamber of Professional Engineers of Lower Saxony)
Koninklijk Instituut Van Ingenieurs (KIVI), The Netherlands

Overseas Experience

Bangladesh, Brazil, Bulgaria, Cameroon, Egypt, Estonia, Germany, Ghana, Iran, Jordan, Namibia, New Zealand, Oman, Pakistan, Panama, Russia, Sri Lanka, Tanzania, U.A.E., Vietnam, Zanzibar



Curriculum Vitae (Hendrik Bergmann)

Languages Dutch, German, English, French

Date of employment 01-07-2008

Position in firm Coastal advisor and Project manager

Specialisation Project management and coastal engineering, failure assessments, shore and scour protection, breakwaters, wave-structure interactions, water front developments, marina planning, tendering and contracts.

Employment Record	<u>Year</u>	<u>Company/ Function</u>
	2008 – present	Delta Marine Consultants Coastal Advisor; Project Manager
	2004 – 2008	Inros Lackner AG Project Manager Coastal Engineering
	2001 – 2003	Prof. Dr. Lackner & Partners GmbH Project Manager Coastal Engineering
	1992 – 2001	Leichtweiss Institute, Coastal Engineering Department, TU Braunschweig Research Engineer/ Senior researcher

Experience (in reverse order)

as of 2008: Delta Marine Consultants

- 2016 Senior coastal advisor: Main and secondary breakwaters for the greenfield multi-purpose port at Lekki, Nigeria
Design review, supervision of model tests, advice on utilization of single layer armour units.
- 2016 Senior coastal advisor: Coastal Revetment for the Nouvelle Route du Littoral project at Réunion, France (Indian Ocean)
Design support, advice on utilization and placement of single layer armour units.
- 2016 Senior coastal advisor: Offshore Wind Energy Demonstrator Project, Blyth, Scotland
Quality control load assessment and design documents
- 2015 Design coordinator/ coastal advisor: Tender design for the planned new main breakwater at Tema Port, Ghana
*Tender design for a 3.8km long breakwater for the Tema port expansion.
Numerical modelling, hydraulic model testing and design coordination*



Curriculum Vitae (Hendrik Bergmann)

- 2015 Senior coastal advisor: Siltation assessment for leisure marina at Walvis Bay Namibia
Study on expected siltation rates in a new marina taking into account the proximity to the existing lagoon and the new container terminal.
- 2014 Port planner: Feasibility study on berth optimization for expansion of oil terminal, Rotterdam, The Netherlands.
Condition assessment of existing berth facilities. Berth optimization and masterplan development for largest barges and seagoing vessels in view of expansion of storage capacity by 70% towards 1.5 million cubic metres
- 2014 Senior coastal advisor: Dredging scheme for new jetties and LNG facilities, Canada
Development of dredging strategy and management for handling and disposal of contaminated dredgeate under strict environmental regulations. Engineering of disposal sites.
- 2014 Design coordinator/ coastal advisor: Layout optimization and tender design for the breakwaters of an offshore supply base, East Timor
Wave modelling study for design optimization of a 3.5km long breakwater. Numerical assessment of wave penetration for swell and wind waves including cyclone conditions.
- 2014 Senior coastal advisor: New oil import jetty at Freetown, Sierra Leone
Hydrodynamic model study and wave modelling for design of jetty and embankment protection. Design of storm water drainage.
- 2013 Senior coastal advisor: Due diligence study for offshore supply bases, Russia/ Bulgaria
Assessment of port facilities (access, terminals and berths) in view of potential utilization for storage and supply of gas pipelines for a major new gas pipeline project through the Black Sea (4 pipelines of 2200km each).
- 2013 Senior coastal advisor: Wave loading at exposed quay wall, CT Liverpool, U.K.
Assessment of extreme wave loading for an exposed berth for various structure components including coping beam, fender blocks and wave wall during construction and in operational phase.
- 2012-2013 Design coordinator/ hydraulics expert: Design of adaptation measures for a cooling water outfall system, Qatar
Study on air entrainment and behaviour of two-phase flow in pipe line and offshore outlet. Advice on physical model tests. Detailed design of adaption works at weir box incl. diffusor and scour blanket at outlet location considering an extremely short construction window of 21 days. Assistance during preparation of construction works including method statements and value engineering.
- 2012-2013 Xbloc advisor: Shore protection at Aqaba New Port, Jordan
Check of design, training on Xbloc placement at site and quality review of placed sections.



Curriculum Vitae (Hendrik Bergmann)

- 2012-2013 Senior coastal advisor: Failure assessment of breakwater toe, Caspian Sea.
Assessment of potential triggers of settlement damages at toe of main and secondary breakwaters (total length 2900m) and determination of feasible counter measures.
- 2011-2012 Senior coastal advisor: Shore protection of an island extension by artificial armour units, Abu Dhabi, U.A.E.
Advice on Xbloc placement at site and analysis of placed sections.
- 2011-2012 Senior coastal advisor: Fit for Service Assessment of seawater storage basin in a cooling water system, Abu Dhabi, U.A.E.
Detailed assessment of a HDPE liner failure observed in an intermediate seawater storage basin (max. discharge 28m³/s). Analysis and recommendation of measures to enhance the system and to achieve envisaged service lifetime.
- 2011-2012 Hydraulics expert/ senior coastal advisor: Failure assessment of a cooling water outfall system, Qatar.
Detailed assessment of the failure of a diffuser box due to excessive air entrainment at the upstream weir box (discharge up to 14.5m³/s). Investigation of main triggers of the failure and development of potential mitigation measures. Advice on additional physical modelling investigations.
- 2011 Project coordinator tender design: LNG/LPG gas jetty and MOF, Ichtys, Australia
Tender design of a product loading facility for liquefied natural gas (LNG), liquefied petroleum gas (LPG) and condensate products. Y-shaped jetty structure with trestle extending 950 m offshore, including loading platforms equipped with breasting/ mooring dolphins and facility platforms. Material offloading Facility (MOF) for LoLo and RoRo operations. All facilities to be designed for self-propelled modular trailers of 350 ton weight.
- 2009-2011 Project manager marine works: Development of a Greenfield port, Abu Dhabi, U.A.E.
Assessment and development of concepts for port master plan, land reclamation, shore protection and breakwaters for a Greenfield port. Numerical modelling on flow regime, wave loading and penetration as well as on sediment transport. Physical model investigations of breakwaters in DMC lab. Detailed design and technical specifications of finger piers and quay walls (approx. 2800m) including furniture, ramps and terminal pavement, breakwaters and revetments (more than 3km), shipyard area including ship lift and travel lift basin, small craft harbour
- 2009-2010 Project manager: Construction of a new Fishery Port under a design-build contract, Sri Lanka
Data analysis, numerical analysis of wave conditions, wave penetration and sedimentation as well as 2D (own lab) and 3D physical model tests (preparation and supervision) for complex breakwater situated partly on steep exposed reef. Detailed design of 1,200 m breakwaters (artificial concrete armour units), 500m quay walls, piers for 500 fishing vessels up to 125ft and bunkering piers.
- 2009-2010 Project manager and coastal expert: Environmental Impact Assessment for a new container terminal on reclaimed land, Walvis Bay, Namibia



Curriculum Vitae (Hendrik Bergmann)

Data collection, numerical modelling of waves, currents, sediment transport, water refreshment rates and dredging plumes, optimization of container terminal footprint (500m x 2300m) on environmental and operational criteria, detailed design of access channel and dredging strategies. Coordination with environmental specialists on environmental impacts and mitigation measures (Lead: DMC).

2008 Coastal expert: Construction of Cinta Costera waterfront, Panama City, Panama
Concept design of 3,500 m shore protection scheme (Xbloc) and advice during construction. Assessment of overtopping performance and optimization of berm design in 2D physical model tests.

2004 - 2008: Inros Lackner AG

2001 – 2003: Prof. Dr. Lackner & Partners

2007 – 2008 Project Manager: Port of Walvis Bay, Namibia

Construction of a 320m new quay for handling of large container vessels, Conceptual design of ship repair hub and dedicated fishing terminal. Financial feasibility studies, analysis of site conditions, environmental assessments, project analysis, structural designs, tender documents.

2007 - 2008 Project co-manager and hydraulics expert: Development of a new Container Terminal, Vietnam

Data collection, preparation of basic design, design-build tender dossier for infrastructure works including water supply, sewage collection and treatment systems, buildings and facilities, bid evaluation and assistance during award. FIDIC Design-Build (Yellow Book)

2006 - 2008 Project manager and port planner: Sustainable Development of Brazilian Harbours, Brazil

Bilateral research project on development of environmental management strategies for Brazilian ports. Assessment of port infrastructure, cargo handling facilities and port environmental management at Paranaguá Port (pilot project).

2007 – 2008 Team leader marine works planning and design: Coast Guard Port Ras Al Kaimah, U.A.E.

Development of a new Greenfield coast guard port. Design of 350m quay wall, ship lift basin, landing ramp and slipway as well as approx. 800m breakwater. Preparation of BoQ and technical specifications for tendering.

2007 – 2008 Team leader marine works planning and design: Coast Guard Port Mina Zayed, U.A.E.

Development of a new coast guard port. Design of 350m quay wall, two ship lift basins, landing ramp and slipway Preparation of BoQ and technical specifications for tendering.

2007 Team leader marine design. Hydraulics expert: Study on Coastal Erosion at Delma Island, U.A.E.



Curriculum Vitae (Hendrik Bergmann)

Coastal erosion study. Reassessment of shore protection scheme. Numerical modelling of wave and sediment dynamics. Design verification by hydraulic model tests.

2006 - 2007 Coastal expert: Development of Cargo Village, Pakistan

Development of a cargo transport and logistics centre consisting of land reclamation, bank protection, deep draft berths, road and rail links, supply and disposal facilities, utility buildings incl. power plant and sea water desalination plant for drinking water supply. Engineering services from master plan review and design to tendering of works.

2006 – 2007 Project manager and hydraulic expert: BAF Krautsand, Hamburg, Germany

Investigation on the hydraulic stability of the lateral underwater barrier of an underwater dredge material storage in the river Elbe.

2006 Project manager and coastal expert: Rehabilitation of Takoradi secondary breakwater, Ghana

Damage assessment and design of breakwater rehabilitation works, including countermeasures against environmental impacts with respect to downward erosion of the coast line.

2006 Hydraulic expert: Transguinean Railway and Deep Water Port Study, Guinea

Feasibility study on location, berth layout and design for vessels up to 250,000 dwt (20 m water depth), concept for cargo handling facilities, landfill and revetment design, cost estimate considering socio-economic and environmental aspects.

2006 Hydraulic expert: Flood protection scheme for the old urban port areas, Bremen, Germany

Development of future flood protection concepts considering alternative alignments, flood barrages, flexible protection systems as well as upgrade of existing shore embankments including stability analysis.

2006 Project manager and senior coastal engineer: Container Terminal at Gdansk, Poland

Scour protection for deep water container terminal at Gdansk. Special consultancy on suggested bed and embankment protection with regard to: hydraulic and geotechnical stability as well as against ship propeller wash and wave impact.

2005 - 2006 Senior engineer marine design: Sumgait CCPP – Cooling Water Circulation Azerbaijan

Intake and outfall structures for the cooling water circulation at a gas powered plant. Feasibility study, preliminary and final design, tender documents, working drawings and site supervision.

2005 - 2006 Team leader marine works and planning: Kish Island – Flower of the East, Iran

Marine infrastructure for coastal resort with yacht marina, comprising land fill, dredging work and coastal protection. Layout studies, engineering and design, set up of tender documents.



Curriculum Vitae (Hendrik Bergmann)

- 2005 - 2006 Special advisor and planner for revetments/closure dams: „JadeWeserPort Container Terminal“, Wilhelmshaven, Germany
Deep water port for mega container vessels. Construction of a 1,725 m long quay structure (27 m level, filling of terminal area and port dyke foreland (total approx. 350 ha) and lateral works. Detailed design, tender documents, participation in award of contract, site safety planning.
- 2005 - 2006 Special advisor on wave structure interaction and wave agitation: Extension of Muuga Port, Tallinn, Estonia
Extension of the Muuga Port through construction of new berths and terminal area. Design and tender documents for quay structures and revetments including dredging and filling work (1,600 m quay walls, 90 ha port area development, 12 million m³ dredging and land reclamation).
- 2003 – 2005 Port planner, wave modelling and wave structure interaction: Rehabilitation/ Reconstruction of Malindi Wharves, Tanzania
Conceptual design of structural options, numerical assessment of wave conditions, functional design and performance specifications, preparation of EDF Design-Build tender documents and assistance during contract award.
- 2004 Hydraulics expert: Relocation and protection of a river mouth, Bremerhaven, Germany
Special consultancy on design of river bed and bank protection at the adapted river mouth in context with the extension of a container terminal.
- 2004 Senior engineer hydraulic design: Design appraisal of a caisson quay for liquid bulk, Tarragona, Spain
Revision of existing design of caisson and scour protection in view of future vessel sizes with special emphasis on bow thruster induced scour.
- 2003 – 2004 Breakwater expert: Construction of new shipyard facilities at Limbé, Cameroon
Project management and supervision of construction works for a Greenfield shipyard (which shall provide services for offshore platforms). The works comprise 800m breakwater, 400 m quay walls and 800,000 m³ land reclamation.
- 2002 – 2003 Team leader marine works planning and design: Sea Front Development from Al Athaiba to Al Mawaleh, Oman
Optimization of general layout including preliminary designs of artificial islands, beaches, shore protections and marinas of a tourist/ business water front development. Revision of master plan, evaluation of design alternatives for marine structures, preliminary design of marina and coastal protection measures, cost estimates, contribution to feasibility study.
- 2002 Breakwater expert: Repair of the Secondary Breakwater at Lomé, Togo
Assessment of wave conditions and causes of damage, design of armour layers, cost estimates.
- 2001 – 2002 Senior hydraulics expert: Erosion Prevention and Bank Protection Project Bangladesh
Development of erosion protection measures in the framework of the „Flood Action Plan“. Re-assessment and revision of key findings, co-ordination and



Curriculum Vitae (Hendrik Bergmann)

elaboration of the main project evaluation report. Preparation of recommendations on planning and design of erosion protection measures in Bangladesh.

2001 – 2002 Project manager and breakwater expert: Rehabilitation of Takoradi Lee Breakwater, Ghana

Evaluation of repair options, final design of breakwater. Consultancy on coastal protection of adjacent beach.

1992 – 2000: Leichtweiss-Institute, Coastal Department

Technical University of Brunswick (Prof. Dr. -Ing. H. Oumeraci), Germany

1998 – 2000 Project supervisor: Underwater filter systems, Germany

Investigations on wave attenuation by submerged filter systems. Wave transmission, wave transformation and consequences regarding the development of sandy foreshores studied in large scale model tests (FZK Hanover). Joint project with Technical University of Berlin (Institute of Maritime and Naval Architecture, Prof. Clauss).

1997 – 1999 Senior researcher: EU MAST – PROVERBS (Probabilistic design of vertical breakwaters)

Special consultative participation in the EU MAST- PROVERBS group on perforated structures.

1996 – 1998 Senior researcher: Optimisation of vertical wave absorbers, Germany

Optimisation of vertical wave absorbers for coastal protection and wave damping in harbours and waterways. Wave reflection and transmission properties of vertical structures with permeable front. Conceptual/ structural planning and supervision/ analysis of large scale hydraulic model tests (FZK Hanover). Joint project with the Technical University of Berlin.

1995 – 1996 Research assistant: Energy dissipation at sea dikes, Germany

Assessment of key parameters with regard to energy dissipation during wave run-up at impermeable dykes. Large scale investigations in the 300m long and 7m deep wave flume (FZK Hanover), analysis of run-up properties, shape of run-up wedge, wave overtopping, etc.

1994 Research assistant: Longshore sediment transport, Germany

Assessment of energy flux and annual longshore sediment transport on basis of wind and wave data at the Baltic Sea (Warnemuende).

1992 – 1995 Research assistant : Foreshore dynamics of non tidal coasts (Baltic Sea), Germany

Field investigations and analysis of the morphological development of the coastline and under water bar conditions. Joint project with the University of Kiel and regional governmental authorities.



Curriculum Vitae (Hendrik Bergmann)

Publications

- Belorgey, M.; Rousset, J.M.; Tabet Aoul, E.H., Bergmann, H.; de Gerloni, M.; Colombo, D.; Franco, L.; Passoni, G. (1999), Perforated caisson breakwaters: Wave loads and hydraulic performance. Proceedings Coastal Structures '99, 10 p., Santander, Spain
- Bergmann, H., Reedijk, B., Meijer, M., Benders, K. (2012), Application of concrete armour units on a nearshore reef. Proceedings of 8th International Conference on Coastal and Port Engineering in Developing Countries, COPEDEC VIII, Chennai, India
- Bergmann, H., Vijlbrief, M., Ten Oever, E., Gelderbloem, E. (2012), New container terminal for Walvis Bay. Hansa International Maritime Journal, Vol. 2, pp. 84-89, ISSN 0017 7504
- Bergmann, H.; Oumeraci, H. (2008), Wave induced water levels and pressure distribution at perforated walls. Proceedings of 7th International Conference on Coastal and Port Engineering in Developing Countries, COPEDEC VII, Dubai
- Bergmann, H.; Oumeraci, H. (2002), Senkrechte Wellenschutzbauwerke mit durchlässiger Front (Vertical Wave Protection Structures with Permeable Front), Hansa International Maritime Journal, Vol. 7, pp. 57 63, ISSN 0017 7504
- Bergmann, H.; Oumeraci, H. (2001), Digue innovante en caissons multichambres. Revue française de génie civil. Vol. 5, no.7/2001. Numéro spécial: Génie côtier. pp. 973-993.
- Bergmann, H.; Oumeraci, H. (2000), Wave loads at perforated caisson breakwaters. Proceedings of 27th International Conference on Coastal Engineering ICCE'2000, Editor: Billy L. Edge, Sidney, Australia
- Bergmann, H.; Oumeraci, H. (1999), Hydraulic performance of perforated structures. Proceedings of 5th International Conference on Coastal and Port Engineering in Developing Countries, COPEDEC V, Vol.2, pp. 1340 1349, Editor: Gary P. Mocke, Cape Town, South Africa
- Bergmann, H.; Kortenhaus, A.; Muttray, M. (1999), Aktueller Stand und Entwicklungen bei Wellenschutzbauwerken (Current State and Developments on Wave Protection Structures), Hansa International Maritime Journal, Vol. 1, pp. 60-66, ISSN 0017 7504
- Bergmann, H.; Oumeraci, H. (1998), Wave pressure distribution on permeable vertical walls. Proceedings of 26th International Conference on Coastal Engineering ICCE'98, Editor: Billy L. Edge, Copenhagen, Denmark
- Bergmann, H.; Oumeraci, H. (1998), Hydraulic Performance and wave loads of perforated structures. Proceedings 2nd Overall Project Workshop, MAST III, PROVERBS Project: Probabilistic Design Tools for Vertical Breakwaters, Chapter 1.8a, 8 p., Naples, Italy
- De Gerloni, M.; Colombo, D.; Belorgey, M.; Bergmann, H.; Franco, L.; Passoni, G.; Rousset, J. M.; Tabet Aoul, E.H. (1999), Alternative low reflective structures - perforated vertical walls. Final Proceedings, MAST III, PROVERBS Project: Probabilistic Design Tools for Vertical Breakwaters, Milano, Italy, Vol. IIa: Hydrodynamic Aspects, Chapter 8.1, 41 p.
- Gruene, J., Bergmann, H. (1994), Wave loads on seadykes and revetments with composite slopes and berms. 24th International Conference on Coastal Engineering, Kobe, Japan.



Curriculum Vitae (Hendrik Bergmann)

- Koether, G.; Bergmann, H.; Oumeraci, H. (2000), Wave attenuation induced by submerged filter systems. 4th International Conference on Hydrodynamics (ICHHD), Yokosuka, Japan, pp. 711-716.
- Schüttrumpf, H., Bergmann, H., Dette, H.H. (1994), The concept of residence time for the description of wave run-up, wave set-up and wave run-down. 24th International Conference on Coastal Engineering, Kobe, Japan.

.....
(Signature of staff member and/or authorised representative of the consultant)

.....
Date (dd/mm/yy)

APPENDIX 4 – WRITTEN COMMENTS FROM THE PUBLIC REVIEW PERIOD

Subject: Re: Walvis Bay Waterfront - Environment and Social Impact Assessment for Public Review
Date: Monday, 5 February 2018 at 1:51:04 am Central Africa Time
From: Gerhard Rossler <grossler@iway.na>
To: Info - ECC <info@eccenvironmental.com>

Good day

With reference to the invitation to I&APs to comment on the ESIA for the proposed Walvis Bay Waterfront project, as a registered I&AP I have the following comments to submit for consideration, explanation and clarification:

1. Request for clarification; confusing use of different company names:

- In the Background Information Document of June 2017, **Walvis Bay Waterfront Development Pty Ltd** is named as the developer.
- On the January 2018 ESIA cover sheets, **Walvis Bay Waterfront Pty Ltd** is listed, as well as stated as the Client Name on the inside cover.
- In the above documents, e.g. on page 3 of the ECC-41-54-REP-25-A Document, reference is repeatedly made to **Walvis Bay Waterfront Properties Pty Ltd**.

Are there in fact three different companies involved in the Walvis Bay Waterfront project? If so, there is material failure to explain the relationship of the three companies in the proposed project. If the name of the developer appears in three different versions, but refers to only one single entity, this is a material defect and could be construed as misleading. Your urgent attention to this issue is required.

2. Socio-economic impacts:

Since the Walvis Bay Municipality is a proponent and shareholder in this project, presumably providing director(s) on the board of the development company, this makes by extension every inhabitant, or at least all registered property owners, tenants of properties or businesses who are registered at the Municipality an Interested and Affected Person. This is so by the fact that the Municipality is entering into a commercial enterprise, which may require financial and material resources to be invested into this project and may also involve certain commercial risks and exposures, which could affect the availability of funds or resources of the Municipality, possibly to the detriment of the inhabitants, especially those of lower income groups. The main source of the Municipality's funds is from rates, taxes and services levied upon the residents and they therefore have a vested stake in the Municipality's financial affairs.

IT MAY ALSO FORCE THE MUNICIPALITY TO MAKE CHOICES IN FAVOUR OF AN UP-MARKET DEVELOPMENT FOR THE AFFLUENT VS. THE REQUIREMENTS OF THE MAJORITY OF THE LOWER AND MIDDLE-INCOME INHABITANTS.

Considering the above argument, the ESIA comes short in providing critical judgement on the effect that this project may have with the Walvis Bay Municipality as partner and shareholder. For example; has the Municipality made a proper Risk Assessment on their involvement in this project? Has the alternative of selling the two erven on which the proposed Waterfront is to be developed been considered as an alternative? It certainly would provide cash resources for much-needed land development for the huge backlog in the provision of housing?

The absence of discussion and consultation with the inhabitants of Walvis Bay on these issues is a glaring omission in the coverage of the socio-economic impact of this development.

3. Cumulative Impact Assessment:

A CIS is virtually circumvented in the ESIA, yet there are compelling reasons why this should be done in great detail and with arm's length honesty. The adjacent property in the north-western corner of erf 4941, (ref page 39, 4.1.4 Adjacent Areas of the ESIA), has been sold and according to news reports, a large hotel is to be built on this property in the near future. Together with the proposed hotel in the Nampont Waterfront development, we are

now looking at a potential four new hotels in the area. This certainly should be well considered in a CIA. Already the provision of around 200 new hotel rooms at the proposed development covered in the ESIA, there is a danger of swamping the Walvis Bay Hotel and Guest House accommodation market to the detriment of all involved. Again the involvement of the Walvis Bay Municipality in the provision of this hotel room overkill merits further discussion.

4. Sports Facilities:

It is unacceptable that there should be a one-year long waiting period until pool, tennis courts etc are re-located to the Jan Wilken Sports Area. If one looks at the experience of the Swakopmund Municipal Pool relocation, the period will probably be significantly longer.

It is also not clear, to what extent the Walvis Bay Municipality has exposure to additional expenditure for the sports facility relocation.

5. Stakeholder Involvement:

In the light of the above arguments, I propose that further public information is needed, to be discussed at public meetings which address the broader spectrum of the Walvis Bay population.

With kind regards.

Gerhard Rossler

P O Box 670
Walvis Bay

Mobile: 081 124 3628

E-mail: grossler@iway.na

On Jan 15, 2018, at 10:50 PM, Info - ECC <info@eccenvironmental.com> wrote:

Dear Stakeholders and I&APs for the proposed Walvis Bay Waterfront Properties Pty Ltd Project,

Environmental Compliance Consultancy (ECC) hereby invites you to review the Environment and Social Impact Assessment (ESIA) for the proposed Walvis Bay Waterfront development.

In accordance with the Environmental Management Act, No 7 of 2007 all stakeholders are invited and presented the opportunity to review and give comments on the ESIA report and the ESMPs.

In parallel to the public review, ECC has engaged The Southern African Institute of Environmental Assessment (SAIEA) to conduct an independent 3rd party review of the Environment and Social Impact Assessment and associated Environment and Social Management Plans.

Furthermore the ESIA is issued to the following institutions for review:

- RAMSAR Convention (Namibia and Switzerland)
- Ministry of Environment and Tourism
- Ministry of Fisheries and Marine Resources
- NAMPORT
- Walvis Bay Municipality
- Ministry of Works and Transport
- Namibian Dolphin Project
- GIZ
- Namibian Coast Conservation and Management Project
- Business including The Raft Restaurant, Protea Hotel, The Walvis Bay Yacht Club, JCAA and;
- Registered interested and affected parties

The public review period extends from the 15th January until the 5th February 2018.

ECC kindly requests comments to be submitted to info@eccenvironmental.com or by post to PO BOX 91193 Klein Windhoek.

Please find below the links to the electronic copies of the Environment and Social Impact Assessment and Management Plans for your review and comment. Please contact our offices should you be unable to open or access the documents.

Environment and Social Impact Assessment and all Appendices can be viewed at:

<http://eccenvironmental.com/walvisbay-docs/>

Please do not hesitate to contact us should you have any questions.

With kind regards,

Jessica Mooney and Stephan Bezuidenhout

ECC Info

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Info at ECC

Environmental Consultants

Windhoek | Namibia

Tel: +264 81 653 1214 or +264 81 262 7872

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<image001.jpg>

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NatMIRC comments on Walvis Bay Waterfront EIA

Directorate Resource Management

General comments:

Definitions of the areas referred to as the Walvis Bay lagoon and Ramsar site are not consistent throughout entire report (incl. specialists' reports).

The paper by Wearne. K and Underhill L. G, (2005) is quoted very often. This paper is 13 years old now. If no more recent info is available it might be necessary to collect it during an EIA, rather than rely on old literature?

The numbering from Chapter 3 onward is very confusing...

ESIA report:

Chapter 2: Regulatory framework

Seashore Ordinance is missing in table 5.

Chapter 3: Approach to the ESIA

Fig 4. Ramsar boundaries not visible

Chapter 4: Project description

4.4 Land ownership – it is only mentioned that the off-shore area in the Lagoon is under the control of the Government (managed by MET). Who does it belong to? If it is below the registered high-water mark it belongs to the state. The Seashore Ordinance (1958) prescribes how the high-water mark is surveyed. This is the mandate of the Ministry of Lands and Resettlement (the surveyor general) – nothing of this is even mentioned in the report. The ownership of land and the surveying of the high-water mark need to be done according to Namibian laws to avoid another “Platz am Meer” situation. Walvis Bay Municipality has no jurisdiction over state owned land.

The included artist impressions are very misleading and should reflect reality. No beach life on white sand will be possible in the area (e.g. Figures 15 and 18). An ESIA should not try and sell the development but reflect reality and assess the impact of the development. Rather mention that in reality there are often algal blooms in the lagoon, depriving the water column of oxygen leading to smelly water and muddy sediments – not the typical beach scenario.

4.6. Suggestion from the meeting with MFMR (to exclude the marina) have not been taken into consideration (in fact, minutes of that meeting have not even been included or supplied after we requested them).

4.1.25.1. Anoxic waters will be a major issue and should get the attention and planning needed and not be a simple “oxygenation may be applied”. If there is a need to flush the inner marina, which is very likely given the water conditions, this should be addressed in detail in the ESIA and this might have major impacts on the lagoon.

Chapter 5: Alternative sites and evolution

No alternate proposal of the development without a marina, a very controversial part of the development in the sensitive lagoon area, has been proposed. Why not?

Table 12 does not say if the IUSDF Marine Development Area is compliant with the SEA. Does this mean it is not compliant? It should be mentioned if it is compliant or not. The IUSDF Marine Development Area also overlaps with the Ramsar site (see Fig. 5).

5.4

It is mentioned that boat users were consulted and the designs presented to them. No attendance register or minutes of these consultations are included in the report. These should be included and circulated.

5.1.6

” new land or infrastructure does not extend into the Lagoon,” - the new structure clearly extends into the lagoon (as indicated in several figures)

Chapter 6: Environmental and social baseline

6.7

Ugab River appr. 1600km from Walvis Bay? Our entire coastline is about 1572km long....

6.12.

An official statement by Namport on this should be included in the report as it is unlikely that two yacht harbors will be feasible. A feasibility study on the need of the marina should be included in the report. Where, for example does the number of 70 boats mentioned elsewhere in the report come from? This number should not just be mentioned but the studies leading to them should be included or at least referred to so the interested reader can read them.

Chapter 8: Assessment and Mitigation

8.1.2.4 Summary of employment impacts

It is mentioned that an estimated 9900 could potentially migrate to Walvis Bay as a result of this development due to the creation of 5000 jobs. The impact on the community (changes to community cohesion) is rated as adverse low (1). The report, however, fails to

acknowledge the additional pressure on schooling, housing etc. this will put on the social system in Walvis Bay, which is already severely under pressure. Hundreds of Grade 1 pupils struggled to find a place in school this year. This will just get worse with additional families moving to Walvis Bay. These facts cannot be ignored when mentioning employment impacts. The significance of this negative impact is highly underrated.

8.1.21.1 Summary of impacts on water quality

Table 34: The impact of the marina operation on the local community (foul smelling environment due to anoxic events) is rated as adverse low. If this includes the inner marina this impact is likely to be highly underrated as it has not been assessed in the ESIA. Algal blooms, anoxic muddy waters etc. are almost the norm already. In closed channels, where the water temperature is likely to increase this will just get worse and smellier, with a major impact on the local community.

8.1.32 Marine Mammals

“Bottlenose dolphins are considered as medium value and sensitivity”. I disagree with this statement. They are highly valuable for the marine tourism industry and are highly sensitive due to their very low numbers (estimated to be less than 100 individuals, the lowest number of any mammal population in Namibia, according to the Namibian Dolphin project). Any negative impact on individuals of this small population has a potential impact on the population.

8.1.36 and 8.1.37 Noise impacts during construction and operation

The cumulative impact of all noise in the harbor area (an important area for Bottlenose dolphins), even if temporary, is not taken into account. Another source of noise in the area, driving dolphins away from an important resting and feeding area (the lagoon) might increase stress levels to a point where negative effects on the population can be expected. The impact of another potential 70 boats in that small key area cannot be classified to be minor.

Stakeholder engagement:

Minutes of meeting with MFMR at NatMIRC are missing. Many of the concerns raised at this meeting have not been addressed in the ESIA.

Attendance register and minutes of meeting with NDP are missing.

Minutes of meeting with Namport are missing.

Marine Mammal study:

This report is unnecessary long and includes a lot of information not relevant for this ESIA. The report should focus on the impact of the proposed development on the marine mammals that are likely to occur in the area only. It is extremely tiring and tedious to find the information relevant for

the development in the report. The report does not need to be more than 30 pages (like the Avian impact assessment, which is concise and to the point).

Page 6: “The quota for the annual cull, sanctioned by the Namibian government, is based on the status of fish stocks.” This statement is wrong!! Further is seal harvesting not done as population control but it is sustainable harvesting of a resource.

The chemical oceanography is hidden in the marine mammal specialist study and not described clearly with clear reference to the proposed development (which, according to the artist’s impression, promises clean water for swimming and white beaches).

While it is true that a potential positive aspect of dredging is the release of nutrients into the water column which can increase productivity, in the affected area in the lagoon this might actually be a negative aspect as it can lead to even more algal blooms and oxygen depletion. The aspect of algal blooms and low oxygen waters in the lagoon should be described clearly in relation to the proposed development.

During dredging and construction free access by dolphins to the lagoon is blocked. Even though this might be temporary it might have a huge negative impact as the lagoon is an important feeding and resting area. Data should be presented on how frequently the dolphins utilize the lagoon and how the even temporary loss of this area will affect the dolphins? Is the use of the lagoon by the dolphins seasonal?

Appendix K1 and K2

Any explanation of these diagrams?

EMP:

Construction:

During construction (esp. dredging) regular (at least every two weeks) sampling of water quality should be done in the lagoon, not just turbidity but also heavy metals (especially Cadmium) which might be released from the sediments.

Avian monitoring should be described in more detail. What type of monitoring is meant?

Ref No 12: Any water discharged into marine environment must adhere to accepted water quality standards.

Decommissioning:

“The project has a life span, which is yet to be finalised. It is assumed that at a certain point, the development will require decommissioning and the site will be reinstated back to its original or similar condition.” Is this really the case for a development of this type?

Comments on ESIA Report for the Walvis Bay Waterfront, January 2018

Directorate Aquaculture

1. Herewith some comments on the ESIA Report, January 2018

- Definitions and Abbreviations: Include an acronym MFMR for the Ministry of Fisheries and Marine Resources
- 2.2 International Conventions: Include Benguela Current Convention (BCC)
- 2.4 National Statutes: Include the National Marine Pollution Contingency Plan (NMPCP, 2017)
- General comment: The numbering from Sub-section 3.2 onwards for the rest of the document should be corrected e.g. the next sub-section under 3.2 should be 3.2.1 and not 3.1.1
- 3.3 Monitoring and Auditing: Remove “Step 7” since it is already in 3.1.8 under Section 3.2. Will the proponent or Competent Authority (MET) appoint a Project Steering Committee (PSC) or an Environmental Management Committee (EMC) for the duration of the project to do the monitoring?
- 4 Project Description: redo the numbering for this whole section – it is confusing / wrong
- 4.1.18 Waste Management: Marina Dredged Material: it is stated that approximately 78,000 m³ of dredged material and 22,500 m³ of on-shore excavated material, in total approximately 100,000 m³, will require disposal / relocation to the preferred disposal area of Industrial Zone 14. The average tipper truck has a load volume of about 20 m³ and therefor approximately 5,000 trips by these trucks will have to move from the project site to the proposed relocation site. There will be serious issues e.g. mud on the streets of town, dust, increased traffic and noise. I would propose that the dredged material should be dumped by the dredging vessel at the official NAMPORT dumpsite to the north of Pelican Point.
- 4.1.31 Waste Management: Dredging (Under Section 4.10 Final Design and Operations): What are the estimated volumes of dredged material that will be produced during maintenance dredging? Not one of the four potential sites (Figure 13: A, B, C or D) for dredged material from 2 and 5 year maintenance dredging operations should be used to dump dredged material. The NAMPORT dump site to the north of Pelican Point should be used for this.
- 6.1.8 History of Walvis Bay: The second paragraph states that “*The Republic of Namibia became independent in 1978*”. This is obvious disregard to Namibia’s Independence that was obtained on 21st March 1990.
- 6.1.37.1 Turbidity: Also consult the work done by Geo Pollution Technologies Namibia for NAMPORT during the construction of the new Container Terminal Project. They have monitored turbidity and other relevant parameters since 2014.
- 6.1.38.3 Mammals, Fish & Invertebrates: the first paragraph mentions “*...a non-breeding colony of Cape fur seals...are resident on the Peninsula*”. Consult the MFMR Marine Mammal Section regarding this statement.
- 8.1.13 The Lagoon: The report states that “*The Lagoon is used for commercial mariculture farms...*”. The commercial mariculture farms are within the NAMPORT

boundaries of the Aquaculture Production Area 1 and this is located in the bay area. One oyster farm is operating in the Walvis Bay Salt Pans.

- 8.1.16 Water Quality: Turbidity 7 Suspended Sediments: The statement “...*the biodiversity is limited to a few species that can tolerate the environment.*” Should be explained and verified with references. This is a very general statement.
- 8.1.17 Suspended Sediments: Construction: A more detailed description of the “...*gravel dredge pump system and vibratory piling techniques...*” should be given in order for the reader to grasp exactly what is meant. Also refer to the concern on Section 4.1.18 on the volume of dredging material i.e. ± 100,000MT that will be produced and relocated to Industrial Zone 14. Will the dredged material be pumped directly onto the trucks or will it be stockpiled on the construction area to allow the water to drain from the dredged material? Will the same method be applied for the initial dredging during the construction phase and also during the following maintenance dredging after every 2nd and 5th year?
- 8.1.18 Suspended Sediments: Operations: This matter should be discussed properly with the Namibian Mariculture Association and the shellfish farmers since it could negatively impact on their operations.
- 8.1.20 Water Pollution: The Department of Maritime Affairs (DMA) in the Ministry of Works and Transport should be consulted and informed. The National Marine Pollution Contingency Plan Operations Team should also be consulted and informed of this project and its possible impacts and risks.
- 8.1.21 Walvis Bay Wetland RAMSAR Site: Both the MET and the Benguela Current Convention (BCC) have responsibility for RAMSAR sites nationally and regionally and they should be consulted and informed.
- 8.1.41.1 NAMPORT: Does the first sentence refer to the NAMPORT new Container Terminal Project?
- 9.6 Consultation Feedback and Next Steps: There was a meeting held between the proponent and the MFMR on 23rd June 2017 and there is evidence of that meeting in the form of an Attendance Register, however there is no report of the comments and input made by staff of the MFMR. This is a gross oversight.

2. **Herewith some comments on the various Appendices to the ESIA Report, January 2018**

A general concern and question regarding the ESMPs: Who will monitor the execution and implementation of the ESMPs? Will it be MET or will a Steering Committee or an Environmental Management Committee be formed to do this?

- i. Appendix A1: C-ESMP:
3.3.2 Other Stakeholders – correct the name of our ministry to **Ministry of Fisheries and Marine Resources**
- ii. Appendix A2: O-ESMP:
5.4.1 Dredging Activities – add a new bullet point to read “*Provide early notice to the Namibian Mariculture Association and to all the commercial shellfish farmers in Walvis Bay.*”
5.4.2 Canal Maintenance – change the 4th bullet to read “*Sample **and analyse** to water to ensure....*”
5.6 Waste Management: Dredged Material: Dredged material should be dumped at the official NAMPORT dump site north of Pelican Point

5.9 Pollution and Contingency Plan: Conform to the *National Marine Pollution Contingency Plan (NMPCP), 2017* and work closely with the **NMPCP Operations Team**.

5.12 Environmental Emergency And Response Contacts: The Operations Manager of the project should work closely with the Department of Maritime Affairs in the Ministry of Works and Transport.

- iii. Appendix A3: D-ESMP: It seems as if this Appendix was initially drafted for the Otjikoto Gold Mine.
 - 2.1 Decommissioning and Site Reinstatement Objectives: In this section the report states that *“The project has a lifespan, which is yet to be finalised. It is assumed that at a certain point, the development will require decommissioning and the site will be reinstated back to its original or similar condition”*. Does this mean that the waterfront and the whole development will be decommissioned after a number of years? This is conflicting to the ESIA Report which states in Section 4.1.24 that *“The Walvis Bay Waterfront will be a permanent feature of the town of Walvis Bay”*
- iv. Appendix D: Stakeholder Engagement:
 - 5. Ministry of Fisheries and Marine Resources: This section lists the attendance register of a project meeting on 23rd June 2017 between the proponent and the MFMR, but there are no minutes of that meeting, and also no record of the questions, queries and concerns raised by the MFMR staff depicted in this Appendix D.
- v. Appendix I: Hydrodynamic Impact Assessment Study

As far as I know **Delta Marine Consultants** did this study or a similar study with the CSIR. It would be good if the graphs in this study report can be extended to show the bathymetry and the hydrodynamics up to a point north of Pelican Point to indicate these parameters for the Bay area. (See Figure 3-2).

Subject: Walvis Bay Waterfront - Environment and Social Impact Assessment for Public Review
Date: Monday, 5 February 2018 at 3:37:16 pm Central Africa Time
From: Bruce Stewart <bruce@sp.com.na>
To: Info - ECC <info@eccenvironmental.com>
CC: Stephan Bezuidenhout <stephan@eccenvironmental.com>, Jessica - Environmental Compliance Consultancy <jessica@eccenvironmental.com>
Attachments: image002.png, image003.jpg

Good afternoon Jessica and Stephan,

Many thanks for your email together with your invitation to review the supporting documentation of the E&SIA Report for the Walvis Bay/ Afrikuumba Waterfront development proposals.

Once again, I do not have any strong objections to the principle/ development concept for the Walvis Bay/ Afrikuumba Waterfront. In my review there are still a number of issues that I believe still require further clarification.

I have the following preliminary comments to make:

1. To begin with, the two component parts of the Walvis Bay Waterfront (NamPort/ Afrikuumba) still need to be considered together in an integrated and holistic way and as recommended by the IUSDF. In addition, the existing Pelican Bay Hotel, which is in the middle of both Waterfront proposals also needs to be given due consideration and attention.
 - ***This still does not seem to be adequately covered in the E&SIA Report.***
 - ***In the detail designs urban design consideration will need to be given to the creation of a sense of place, particularly the relationship between adjacent existing and proposed developments and the Waterfront development proposals.***
 - ***I am pleased to note that the esplanade promenade still remains continuous through the Waterfront and becomes a real and important focal point. It is essential that the esplanade promenade remains continuous from Lovers Hill to the new NamPort Container Terminal.***
2. The development proposals indicate a significant total business floor area, including $\pm 24,000\text{m}^2$ of retail space.
 - ***This business space allocation (particularly retail and office) is not supported by a Market Research Study; there is no evidence base to support the total business floor area.***
4. I am generally comfortable with the Traffic Impact Study.
 - ***The closure of the Esplanade is definitely in support of the project, but not necessarily in terms of the wider public interest. Pedestrian and vehicular access to the Raft Restaurant and the Pelican Bay Hotel remain compromised even with the introduction of Waterfront Drive.***
 - ***In the detail designs urban design consideration will need to be given to pedestrian and vehicular access to all existing and proposed developments.***
 - ***Hopefully primary accessibility to the Waterfront via Fifth Road and Atlantic Street is possible.***
3. I am comfortable with the relocation/ reconstruction of the existing Municipal recreation facilities which was a previous concern of mine.
5. I am comfortable with the Services Impact Study which was a previous concern of mine.
6. I am comfortable with the Hydrodynamic Modelling Report which was a previous concern of mine.

7. Finally, the E&SIA makes reference to the need for the Walvis Bay Council to undertake a SEA to identify the cumulative impacts of the IUSDF. As far as I am aware, and subject to confirmation by Council Officers, the IUSDF was subject to a SEA.

I trust that this is in order and look forward to further feedback from you in due course. In the meantime, please do not hesitate to contact me in case of any queries or the need for clarification.

Bruce Stewart
Town Planner



84 Theo Ben Gurirab Avenue | First Floor CLA Building | Box 2095 Walvis Bay
Tel: (064) 280 770 | Mobile: 081 170 0960 | Email: bruce@sp.com.na

From: Info - ECC [mailto:info@eccenvironmental.com]

Sent: 15 January 2018 22:51

Cc: Stephan Bezuidenhout <stephan@eccenvironmental.com>; Jessica - Environmental Compliance Consultancy <jessica@eccenvironmental.com>; Info - ECC <info@eccenvironmental.com>

Subject: Walvis Bay Waterfront - Environment and Social Impact Assessment for Public Review

Dear Stakeholders and I&APs for the proposed Walvis Bay Waterfront Properties Pty Ltd Project,

Environmental Compliance Consultancy (ECC) hereby invites you to review the Environment and Social Impact Assessment (ESIA) for the proposed Walvis Bay Waterfront development.

In accordance with the Environmental Management Act, No 7 of 2007 all stakeholders are invited and presented the opportunity to review and give comments on the ESIA report and the ESMPs.

In parallel to the public review, ECC has engaged The Southern African Institute of Environmental Assessment (SAIEA) to conduct an independent 3rd party review of the Environment and Social Impact Assessment and associated Environment and Social Management Plans.

Furthermore the ESIA is issued to the following institutions for review:

- RAMSAR Convention (Namibia and Switzerland)
- Ministry of Environment and Tourism
- Ministry of Fisheries and Marine Resources
- NAMPORT
- Walvis Bay Municipality
- Ministry of Works and Transport
- Namibian Dolphin Project
- GIZ
- Namibian Coast Conservation and Management Project
- Business including The Raft Restaurant, Protea Hotel, The Walvis Bay Yacht Club, JCAA and;
- Registered interested and affected parties

The public review period extends from the 15th January until the 5th February 2018.

ECC kindly requests comments to be submitted to info@eccenvironmental.com or by post to PO BOX 91193 Klein Windhoek.

Please find below the links to the electronic copies of the Environment and Social Impact Assessment and Management Plans for your review and comment. Please contact our offices should you be unable to open or access the documents.

Environment and Social Impact Assessment and all Appendices can be viewed at:

<http://eccenvironmental.com/walvisbay-docs/>

Please do not hesitate to contact us should you have any questions.

With kind regards,

Jessica Mooney and Stephan Bezuidenhout

ECC Info

--

Info at ECC

Environmental Consultants

Windhoek | Namibia

Tel: +264 81 653 1214 or +264 81 262 7872

Email: info@eccenvironmental.com



www.eccenvironmental.com

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Lagoon Enterprises CC t/a The Raft

CC/95/00608 VAT No. 0055716-01-5

The Esplanade P.O. Box 2962 Walvis Bay

Tel : +264 (0)64 204877 E-mail: sarah@theraftrestaurant.com

Responses to ESIA report Walvis Bay Waterfront January 2018

8.1.3.1. The Raft Restaurant Construction

Claims that the construction of the breakwater wall will take approximately one month to construct are in the opinion of the owners, doubtful.

Is there any kind of guarantee that it will only take this long?

Claims that the noisy activity of vibratory piling will take approximately two weeks is, in the opinion of the owners, doubtful.

Is there any kind of guarantee that it will only take this long?

8.1.3.2 The Raft Restaurant Structure & Integrity

Who will pay for the further investigations into the integrity of the structure of The Raft?

The owners are aware that there is maintenance work currently required on The Raft, however, since the Water Front project was proposed over two years ago in November 2015, they have been reluctant to invest in something that could be seriously impacted by construction works of the Water Front project, without some kind of guarantee that they would be compensated accordingly.

What kind of guarantee would there be for compensation with regard to impact from the construction of The Waterfront development, on the structure and foundations of The Raft?

If the business is closed down due to safety requirements, what compensation would be guaranteed in terms of; loss of revenue, payment of wages, payment of overheads incurred during the closed period and loss of perishable stock etc.?

8.1.3.3. The Raft Restaurant: Operation

The report states that the access route will be 'slightly' longer.

The current jetty is 40 metres long and is protected from the south westerly wind by the building itself for approximately 50% of that distance. Despite that customers complain about the distance they have to walk on a cold windy night

According to the plans available, the new access route would be more than 3 times longer than that

and would be completely exposed to the wind!

What provision would be made for protection from the wind on the new (3 x longer!) access route?

It is envisaged that meetings between the owners and the developers will take up considerable amounts of time over the two and a half year period.

Time that is currently being spent running the business.

In this case it is expected that an additional Manager will need to be taken on to cover for the work currently carried out by the owners.

What compensation will be provided to the owners in this regard?

The main concern of the owners has always been that the business would not survive the construction process and therefore fail to benefit in the long term.

What guarantee of compensation will be given that the business will be supported throughout the construction process (two and a half years) and on into the recovery period, as it must also be taken into account that it will take a considerable time to build up the reputation of the business again?

Additional Comments

Concerns previously raised and yet to be responded to include;

- The new 'route' for sewage would need to have some kind of substantial pumped system due to; the fall, distance and 'corners' involved. Who would be responsible for paying for the initial provision and installation, as well as the ongoing maintenance of such a system?
- A complete exterior makeover of The Raft would be required to compliment the new surroundings so that The Raft does not look like a broken, rundown, neglected poor relation when compared to the brand new swanky environment that would surround us.

Currently the rustic appearance is part of the charm of Walvis Bay; The Municipality features 3 photos of The Raft on their website and for a long time had one on its home page.

- Re-branding would be required as the appearance of The Raft from the land will change drastically and the library of beautiful photos that has been built up over the past 15 years and used for publicity and advertising would be essentially useless as they would not portray an up to date image and could thereby bring problems of misrepresentation.

Sunset photos from east with The Raft in silhouette

Photos from jetty

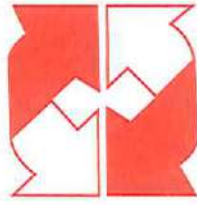
Flamingos in front of and around The Raft

Dolphins around Raft

Our current brand image which has been built up over 15 years will be completely nullified and there will be no alternative to offer until the project is completed.

Who would pay for this re-branding?

- Retrenchments would be inevitable as business declined.
Who would pay the retrenchment costs?
- Over the past 12 years we have trained up staff to a high standard, to start all over again building a successful team would incur considerable additional money and valuable time.
Who would pay for this?
- The long term sustainability of the business with regards to the renewable lease on the land (seabed) and the concern that the developer may, at the time of renewal, present 'competition' and attempt to procure the lease on the land (seabed) by being in a position to offer the lessor a higher rent.
What guarantee can be offered in this regard?
- Having been in the hospitality business for 12 years now on a fulltime basis, the owners were planning to sell the business at some stage during the next couple of years.
With the future of The Raft now in jeopardy, it will be impossible for them to convince any potential buyer of the potential value as there is no guarantee over how long the project will take or even worse no guarantee as to whether it will ever be completed.
What compensation will be offered to the owners in this regard?
- Staff morale will be hit by the uncertain future of The Raft and as a result we would risk losing staff members in whom we have invested time and money over the past 12 years and who have been loyal to us and hard working.
What compensation will be offered to the staff?



United Africa Group

07 February 2017

Ultimate Holding Company

United Africa Group (Pty) Ltd.
Reg. No. 87/192

SERVICES

United Africa Namibia (Pty) Ltd.

- Trans United Haulage Asset Leasing (Pty) Ltd.
- United Grocer Sales (Pty) Ltd.
- United VAT Consultants (Pty) Ltd.
- Gampak Investments (Pty) Ltd.
1/a United Bureau De Change
Tel.: +264 61 277 826
- United Travel Express (Pty) Ltd.
- United Insurance Brokers (Pty) Ltd.
- United Security Services (Pty) Ltd.
Tel.: +264 61 237 586
Fax: +264 61 223 488

HOSPITALITY

United African Hospitality (Pty) Ltd.

- Steady Business Consulting (Pty) Ltd.
1/a Protea Hotel Fürstenhof
- Cresta Pandu Namibia (Pty) Ltd.
1/a Protea Hotel Ondangwa
- Royal Investment (Pty) Ltd.
1/a Protea Hotel Pelican Bay
- Zum Sparrgebiet (Pty) Ltd.
1/a Protea Hotel Seaview Zum Sparrgebiet
- Zambezi Lodge (Pty) Ltd.
1/a Protea Hotel Zambezi River Lodge
- Burning Shore Investments (Pty) Ltd.
1/a African Pride Burning Shore
- Protea Hotel Thüringer Hof (Pty) Ltd.
- Oshakati Country Lodge (Pty) Ltd.
- Protea Hotel Longbeach Lodge (Pty) Ltd.
- Protea Hotels Namibia (Pty) Ltd.
Tel.: +264 61 213 231
Fax: +264 61 246 660
E-mail: info@proteahotels.com.na
- Pride of Africa (Pty) Ltd 1/a Hilton Windhoek
Tel.: +264 61 296 2929
Fax: +264 61 296 2931
E-mail: wdnhwhk@hilton.com

PROPERTY

United Property Management (Pty) Ltd.

- Wind Properties (Pty) Ltd.
- Imperial Investments (Pty) Ltd.
- Namundjebo United (Pty) Ltd.
- Stübel Street Properties (Pty) Ltd.
- Fürstenhof (Pty) Ltd.
- Zambezi Lodge (Pty) Ltd.
- Pumulula Investments (Pty) Ltd.
- Pandu Ondangwa Hotel (Pty) Ltd.
- SSP 1/a Capital / Independence (Pty) Ltd.
- CPN 1/a City Centre (Pty) Ltd.
- Top Restaurant (Pty) Ltd.
Tel.: +264 61 277 816/7
Fax: +264 61 401 883

Directors:

Marthe Namundjebo - Tilahun
(Chairperson)
Hadidis Tilahun (Executive Director)

Group Chief Executive Officer
Willem Mouton

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Fax: +264-61-264 339
E-mail: info@united.com.na
Website: www.united.com.na

Jessica Mooney

Environmental Compliance Consultancy

Windhoek

Namibia

Per email: jessica@eccenvironmental.com

Dear Madam,

RE: COMMENTS AND OBJECTIONS TO PROPOSED PROJECT OF WALVIS BAY WATERFRONT PROJECT, WALVIS BAY, ERONGO REGION (ECC-41-54-REP-25-a) (THE "PROJECT")

1. We, Namundjebo United (Pty) Ltd, trading as Protea Hotel Pelican Bay, Walvis Bay, a subsidiary of United Africa Group (Pty) Ltd, object to the Environmental and Social Impact Assessment Report, dated January 2018 ("ESIAR") prepared by Environmental Compliance Consultancy. We record that we are the proprietor of, and own the land on which is situated, the Protea Hotel Pelican Bay, Walvis Bay.
2. We have, despite a reasonable request for extension, prepared this objection within the limited time period provided, notwithstanding our rights to fair administrative process. As you well know, our commercial and other interests will be adversely affected to a severe degree should a decision be taken to issue an environmental clearance certificate for the Project. Consequently, we specifically record that we have not had an opportunity to address in detail certain of the legal and technical arguments and we strictly reserve our rights at this stage to

amplify the contents of this objection should it become necessary to do so. Our objection is based on the following salient grounds.

3. The Constitution of the Republic of Namibia entrenches the rule of law and requires, *inter alia*, that all governmental decisions are made by officials acting fairly and reasonably and in compliance with the requirements imposed upon such bodies and officials, especially decisions in respect of government owned and sponsored projects. The ESIAR confirms that the Municipality of Walvis Bay (“MWB”), a shareholder in the project proponent, resolved as early as 2012 to designate the site on which the Project is to be developed for a marina or waterfront development. The location is therefore presented in the ESIAR as a *fait accompli* in contravention of the Environmental Management Act 7 of 2007 (“EMA”) read with its Environmental Impact Assessment Regulations (promulgated in Notice 30 of Government Gazette No. 4870 of 2011)(“EIA Regulations”).
4. This does violence to the principle of natural justice afforded to all interested and affected parties by abrogating their right to consider and respond to project site alternatives; and seriously maligns the independent exercise of the Environmental Commissioner’s discretion since the decision-maker is asked to disregard the advantageous potential of other possible site alternatives in favour of a pre-determined site, for narrow, commercially-driven reasons. This is evident to other interested and affected parties too who have, as recorded in the register of comments in the ESIAR, themselves questioned the need and desirability of the Project and the lack of integrated planning resulting in fragmented environmental management.
5. It is not evidently clear what “sensitive commercial issues” motivated MWB to withdraw from the development of the existing harbour and “northern areas” as a tourist attraction but the Environmental Commissioner must take keen interest in the

fact that a suitable alternative exists and that this alternative, situated further away from the lagoon and RAMSAR site, will form a natural adjunct to an existing development absent the need to turn a Public Open Space into a new development. The Environmental Commissioner will be duty-bound to consider the fact that Namport “intends to develop their area as a waterfront and marina development, and has set out plans in their 2014/2015 Annual Report (Namport, 2015)” and ought to heed the need for inter-governmental co-ordination and harmonisation of actions affecting the environment. The Environmental Commissioner can contribute to integrated environmental management in Walvis Bay by deferring his decision until an independent Strategic Environmental Assessment has been procured in order to consider the Project in its wider context which will promote sustainable development of the sensitive coastline of Walvis Bay rather than indulge surplus development.

6. Mindful that the siting decision was made many years ago and that planning of the Project has been an ongoing process since then, the consideration of the socio-economic and environmental impacts associated with this decision appears to have been an after-thought, initiated as late as 2017, with interested and affected parties afforded a meaningless opportunity to consider the voluminous ESIAR and the attendant specialist studies. Given the severity of the impacts that the Project will have on our business, it is entirely unconscionable that we have been given a couple of weeks only to digest the ESIAR and its attachments, which we received mid-January. We accept that our consent is not required for the Project but we have a right to be consulted, and a reasonable opportunity to comment, which demands an earnest dialogue and not feigned concern for the “potential” impact which the Project may have on the “integrity” of our business.

7. The Environmental Commissioner is reminded of the importance placed on the duty to consult with interested and affected parties and to facilitate public participation. This duty is placed both on Government and individual developers and is required in both Namibian law and international law. In terms of Namibian law, this duty is articulated in the Objects of the EMA (section 2(b)) and in the EIA Regulations (Regulation 21). The Additional Protocol to the Abidjan Convention Concerning Cooperation on the Protection and Development of Marine and Coastal Environment from Land-Based Sources and Activities in the Western, Central and Southern African Region (the “**Additional Protocol**”), which Namibia has ratified, envisages facilitating public access to the “widest possible extent” to relevant data and information concerning pollution and degradation on the Protocol area from land-based sources and activities.¹ Article 6(3) requires participation in the process of taking important decisions to protect marine and coastal environment. Article 6(5) goes further, envisaging that Member States facilitate public access to legal and administrative processes with regard to compensating members of the public who suffered damages as a result of lack of access to information and non-participation in the decision making processes.
8. It is insightful that the ESIAR consoles itself by relegating the fate of our business to “moderately adverse” only because the “free market” deems it acceptable. The ESIAR conspicuously fails to sufficiently record all of our meetings with the Project proponent’s environmental assessment practitioner and the developer, the minutes thereto, and the comments we have recorded to date. On the ESIAR’s own version, further consultation with us would be required, and we would submit that that is indeed a reasonable concession.

¹ Article 6(1).

9. The Environmental Commissioner will be encouraged to consider the fact that the environment may well be adversely affected by unneeded, and thus unsustainable developments, such as the Project, and that, therefore, the cumulative effect of the Project must be addressed also with regard to socio-economic considerations.² The Project proposals suggest a total business floor area of some magnitude, including ±24,000m² of retail space. Interested and affected parties have rightly questioned the need for this volume of retail space and the apparent absence of any market research study in support of thereof.

10. The principle of integration of environmental protection and socio-economic development is fundamental to the concept of sustainable development, as contemplated in the Namibian Constitution and the EMA. The Environmental Commissioner ought not to rely solely on MWB's consideration of the need and desirability of the Project, which MWB has a commercial interest in, but should also independently consider what the socio-economic implications of the Project will be. We are not suggesting that our interests be weighed separately, but we do submit that when the socio-economic impacts of all of the interested and affected parties, who have signaled their discontent and opposition to the Project, are weighed with the potential impacts on the Walvis Bay receiving environment, the scale of a sustainable development tips, we submit, away from the economic developmental sustainability advocated for in the ESIAR.

11. We draw the Environmental Commissioner's attention to the fact that the ESIAR confirms that the waste to be generated by the Project construction phase will be disposed of at "Industrial Zone 14" but to date no environmental clearance certificate has been

² *Fuel Retailers Association of SA (Pty) Ltd v Director-General Environmental Management Mpumalanga and Others* 2007 (10) BCLR 1059 (CC).



issued for such a waste disposal site and the Environmental Commissioner cannot be party to any decision which would lead to a contravention of the Namibian environmental law.

12. If the unreasonable period provided to interested and affected parties to consider the ESIAR and specialist studies was not an indicator of prior design, then the Project proponent's belief in the inevitable issuance of an environmental clearance certificate must be manifested in its blatant disregard for the provisions of the EIA Regulations. There is no power and no discretion to exclude the obligation to prepare a scoping report and to subject that scoping report to public participation. In terms of Regulation 7 of the EIA Regulations, a project proponent "must" prepare a scoping report and "must" give all interested and affected parties an opportunity to comment on the scoping report. This is a preemptory provision of the EIA Regulations and failure to comply therewith must render the process followed by the Project proponent to date procedurally, fatally flawed and for this reason alone, the Environmental Commissioner ought to reject the Project application. It therefore comes as no surprise that the ESIAR readily commends itself on being the subject of a proposed peer review but no interested and affected party will benefit from such an independent external review since nowhere is any undertaking given to extend the public participation process for this purpose.

13. The proposed project is to take place on both a RAMSAR site (wetland of international importance) and protected coastline area. The area has received special attention from both the Namibian Government and the international community. Developments at the site must comply with the Convention on Wetlands of International Importance Especially as Waterfowl Habitat ("**RAMSAR Convention**"), the Abidjan Convention for Co-operation in the Protection and Development of the Marine and Coastal environment of the West and Central African Region (the

“Abidjan Convention”) and the Additional Protocol. Namibia has also formulated a Draft Policy on its Wetlands.

14. It is not clear whether the undated Avian Impact Assessment Report accompanying the ESIAR was made available to the RAMSAR Secretariat. The ESIAR includes correspondence to and from the said Secretariat during May 2017 and suggests that there would have been guidance provided by the Secretariat after the Standing Committee meeting scheduled for June 2017 but there is no evidence that its input was further solicited or that this ESIAR and its specialist study was made available to it for comment.

15. The Avian Impact Assessment Report soberly concedes that the “lagoon environment itself...is the cause of...avian declines” and that the likely impetus for this unfortunate state of affairs is anthropogenic. This report recommends therefore that any additional impacts must be strictly minimised to reduce any additional impacts. This is what the Project proponent’s own specialist concluded and it is of much consequence given the RAMSAR status of the Walvis Bay wetland (the most important marine wetland in southern Africa) and lagoon in which the Project will be developed. Mindful of the existing marine traffic emanating from the harbour and the yacht club, the Avian Impact Assessment Report finds that any further increase in watercraft traffic in an out of the lagoon may dissuade sensitive species to continue roosting in the lagoon as is already evident from the statistics cited in the report. The Avian Impact Assessment Report also expressed concern regarding the “obvious” sedimentation from the Raft restaurant and that this combined with the port expansion “appears to already be reducing bird numbers”. The report called for “research to determine the long-term effects” of this existing negative impact which any further development within the lagoon area is likely to exacerbate by increasing “salinization and dying of this biologically and

internationally renowned wetland". The Project proponent was obliged to consider the impact of the Project on Walvis Bay's RAMSAR designated wetland and no doubt relied on the Avian Impact Assessment Report for this purpose, but the Avian Impact Assessment Report suggests that further research still needs to be conducted.

16. The Avian Impact Assessment, by its inherent nature, would not consider the impact of the Project on the wetland ecology generally and therefore such an assessment is a noteworthy deficiency in the ESIAR. The objective of the RAMSAR status declaration is to limit human intervention and exploitation. The Project will not qualify as promoting such an objective. We submit that impacts that are even moderate should not be allowed in a RAMSAR site as significant as the one in Walvis Bay.
17. The development of the marina threatens the only ocean access point to the lagoon. The human-marine mammal conflict will be high as an impact. Pollution at this point will affect the entire lagoon and will be significant. The time allowed is insufficient for detailed evaluation of specialist reports.
18. Our property is on a down gradient from the new development. Consequently, the developers must ensure that what used to be absorbing the land is now replaced with a hard surface. Inadequate drainage design increases the risk of our property being flooded, which could have a major impact on us. Presently, there is scant detail in the ESIAR regarding such risks and not enough attention has been given to our concerns.
19. The ESIAR notes that maintenance dredging will be required. This activity will have a major impact on the lagoon. The site where the dredged material will be deposited has not yet been decided (see 4.1.31 in the ESIAR) and dredging mitigation measures have

not been thoroughly investigated. This indifferent approach towards crucial details is alarming. Furthermore, Sulphur related release during dredging is an important human health concern which is not addressed. The impacts of dredging are also noted in the ESIAR to impact the structure of the Raft and note is made of further study needed. No such further study is available.

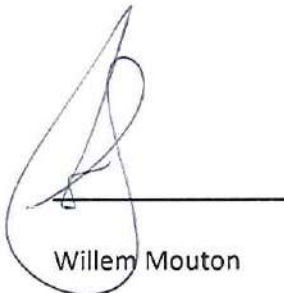
20. The marina will cut off 50m of the 130m channel feeding the lagoon or 38% of the lagoon access flow. It must be a significant impact. The flow dynamic modelling is not shown or discussed in the report. Sea water circulation through the marina is not possible in the design, so the marina will become a stagnant pool of very low quality water with associated disease and smells. Existing flow and sedimentation modelling for the Namport area has been conducted by WSP Coastal which considers the yacht basin and development proposed by Namport. It is unclear whether the proponent considers the combined impacts of Namport development and the project. It is unclear why an unrelated and locally inexperienced modeler is called into this. The modelling does not appear to reflect the structural engineering information and is considered poorly coordinated with site proposals.
21. The developers failed to conduct a comprehensive climate change impact assessment. Presently, climate change is only dealt with in a small section in the ESIAR in 6.1.31 and on the table titled "summary of impacts not assessed as being significant" on page 127. In light of present jurisprudence in South Africa, especially the *Earthlife Africa Johannesburg v Minister of Environmental Affairs and Others* (2017) 2 All SA 519 (GP) case, climate change impact assessments are a necessary part of environmental impact assessments. The court held that "the injunction to consider any pollution, environmental impacts or environmental degradation logically expects considerations of climate change" (para 78). Although this case dealt with a coal-

fired power station, it is submitted that the findings of the court remain relevant.

22. If one has regard to the National Policy on Climate Change for Namibia, it is evident that Namibia is vulnerable to climate change. The policy notes that high sea level rise may inundate coastal towns including Walvis Bay, which is Namibia's only deep water harbor. These statements are made without considering the Waterfront development's contribution to climate change. The development will contribute to climate change both in the short and long term. The need for a climate change impact assessment as well as climate change mitigation measures is aggravated by the environmental significance of the site in question, being both a RAMSAR site and marine and coastal environment.
23. As acknowledged in the ESIAR, a rapid cumulative impact assessment ("CIA") was undertaken. Such a multifaceted and impactful project requires a comprehensive CIA to be undertaken. The present approach ridicules the value in the required and important CIA process.
24. Traffic impact of the future operation of the new container terminal through the south gate does not feature clearly. This will be a huge factor to the access route proposed. The closure of the Esplanade is in support of the project, but not necessarily in terms of the wider public interest. Access to the Raft Restaurant and Protea Hotel Pelican Bay, Walvis Bay remain compromised even with the introduction of Waterfront Drive. The proponent does not consider concurrent plans of adjacent sites. Development cannot be considered in isolation of Namport development. The Traffic Impact Assessment is incomplete.

25. Finally, the Environmental Commissioner must note that the ESIAR fails to mention the developer's obligations imposed by the Abidjan Convention and Additional Protocol. Both agreements have been in force since April 2017. Article 144 of the Namibian Constitution provides that "unless otherwise provided by this Constitution or Act of Parliament, the general rules of public international law and international agreements binding upon Namibia under this Constitution shall form part of the law of Namibia."
26. Having had regard to the ESIAR, we therefore object to the Project on a variety of grounds, as mentioned above and which include, environmental, socio-economic and economic grounds as well as the lack of meaningful participation. We respectfully request the Environmental Commissioner to unreservedly consider all of our objections and to reject the Project by refusing to issue an environmental clearance certificate based on the abovementioned grounds.

Yours Faithfully,



Willem Mouton

Group Chief Executive Officer



The Southern African Institute for Environmental Assessment

**EXTERNAL REVIEW OF THE REVISED
ENVIRONMENTAL AND SOCIAL IMPACT
ASSESSMENT REPORT FOR
WALVIS BAY WATERFRONT**

Name of the project	Walvis Bay Waterfront
Country where the project is to be located	Namibia
Name of proponent	Walvis Bay Waterfront (Pty) Ltd
Name of company which compiled the EA report	Environmental Compliance Consultancy
Date that the EA report was completed	7 March 2018
Name of reviewer	Peter Tarr, John Pallett
Date of review	7-12 March 2018

EXTERNAL REVIEW OF THE EIA FOR THE ENVIRONMENTAL IMPACT ASSESSMENT FOR

PREAMBLE AND GUIDE TO REVIEW DOCUMENT

1 STRUCTURE OF REVIEW FORM

This standard review form allows the reviewer to assess the report in a systematic and structured way both in terms of process and content. An explanation of the grading system used in the review is provided in section 2 below and a summary of the findings of the review is presented in section 3. This is followed by the detailed review form, which is divided into the following sections:

- | | |
|---|--|
| <ol style="list-style-type: none"> 1. Methodology utilised in compiling the EIA report 2. Legal, Policy and Administrative Requirements 3. Description of the project 4. Assessment of alternatives to the project 5. Description of the environment | <ol style="list-style-type: none"> 6. Description of impacts 7. Consideration of measures to mitigate impacts 8. Non-technical summary 9. General approach |
|---|--|

2 EXPLANATION OF REVIEW NOTATION

1. For each question posed in the Review Form, the reviewer considers whether the information is relevant to the project and it is marked Y (yes) or N (no).
2. If the information is relevant, the reviewer reads the relevant sections of the EIA report and specialist studies and establishes whether the information provided is:
 - **Complete or comprehensive (C):** all information required for decision-making is available. No additional information is required even though more information might exist.
 - **Acceptable or adequate (A):** the information presented is incomplete, but the omissions do not prevent the decision-making process from proceeding.
 - **Inadequate (I):** the information presented contains major omissions. Additional information is necessary before the decision-making process can proceed.

3 NARRATIVE REPORT

3.1 Introduction

Walvis Bay Waterfront (Pty) Ltd intends to establish a marina and waterfront development next to the Walvis Bay lagoon. This development is proposed to be situated at the mouth of the lagoon, on two erven on land and extend partly into the marine environment up to the Raft Restaurant. It will be developed in two phases, starting with the construction of the external and inner portions of the marina and hotel-conferencing-business centre, then expanding to lengthen the inner marina and build more business developments. This ESIA covers the entire proposed development.

3.2 Methodology for the review

As stated above, one of the main purposes of an external review is to determine whether the information provided in the EIA reports is adequate to make an informed decision. With this goal in mind, the *modus operandi* of the Reviewer is to concentrate on the information provided in the report, as this is the sole basis on which the I&APs and the competent authority can make their decisions. Thus, as a matter of principle the Reviewer does not engage with the developer, the EIA consultants, the I&APs or the competent authority during the review process. The comments made below therefore are confined to what is written in the EIR.

It should be noted that the review focuses on the content of the **main report** as this is the document which will be read by most of the stakeholders and decision-makers. However, the specialist reports are also examined to ensure that their findings are sound and their conclusions have been accurately reflected in the main report.

3.3 Summary opinion

	Judgement (C/A/I)	Comments
1. EIA Process	C	The process has been thorough.
2. Description of the project	C	Complete and good, well illustrated.
3. Assessment of alternatives to the project	C	Alternative sites for the marina were assessed and the final selection is justified. Other project options also considered, namely disposal sites for dredging waste, configuration of the outer marina for least disruption to lagoon flows, alternative dredging methods, sites for relocation of sports facilities.
4. Description of the environment	C	Good. Information is drawn from the specialist studies, and clearly presented in the main report.
5. Description of impacts	C	Impacts are generally well covered and assessed using a thorough methodology that is clearly described. SAIEA's concern is that the waterfront should not in any way pose risks to the ecological integrity of the lagoon. Project-specific impacts, and cumulative impacts, have been thoroughly assessed. Monitoring and mitigation measures are suggested to ensure that impacts will not threaten the lagoon, and can be detected if negative changes occur.
6. Consideration of measures to mitigate impacts	C - A	Mitigation measures are generally sound and many have been embedded in the design of the marina. The EMPs are clear, specific and thorough. The need for future ongoing monitoring (and responses to what is detected) is emphasised and the O-ESMP commits the WB Waterfront group to this. Monitoring of the criteria that will reveal cumulative impacts also needs buy-in and support from Namport and other stakeholders. The responsibility for this should possibly be carried by a higher authority, such as the WB Municipality. Collaboration with other organisations, such as CETN, is suggested, and should be expanded to include other organisations (eg. UNAM Henties Bay campus).

	Judgement (C/A/I)	Comments
7. Non-technical summary	C	The Executive Summary is good and gives a thorough overview of the project, the baseline, the project-specific impacts and the cumulative impacts, and suggested mitigation measures. The recommendations are conspicuous and give a good overall impression of the important actions that will help to mitigate present and future negative impacts to the social setting, and to the Ramsar site.
8. General approach and presentation	A	The overall approach is thorough and covers all the necessary components of an ESIA. Mistakes in the numbering of the sub-sections is a small nuisance in following which subsections belong to which sections.

3.4 Conclusion

The overall grading of the EIA report **for decision-making** is as follows:

Excellent: The EIA report contains everything required for decision-making on the project. There are no gaps.

Good: The EIA report contains most of the information required as far as it is relevant in the particular circumstances of the project; any gaps are relatively minor and an informed decision can be made.

Satisfactory: The information presented is not complete; there are significant omissions but in the context of the proposed project, these do not prevent a decision being made on whether the project should be allowed to proceed **or not** (i.e. in the case of the latter decision, there is enough information for decision-makers to reject a project).

Inadequate: Some of the information has been provided, but there are major omissions; in the context of the proposed project these must be addressed before a decision on whether the project should be allowed to proceed can be taken (i.e. the Precautionary Principle must be applied).

Poor: The information required has not been provided or is far from complete and the EIR should be rejected.

Key questions	Yes	No	Partially	Don't know
Does the EIA report comply with the Terms of Reference?	x			
Does the EIA report comply with the legal requirements for EIA in the country?	x			
Did the EIA process include genuine public participation?	x			
Were the consultants unduly influenced				x

by the proponent or the Authorities?				
Did the EIA report focus on the most important issues?	x			
Is the EIA report of acceptable quality?	x			
Will the EIA report help to make a more informed decision about the project?	x			

3.6 Recommendations

SAIEA fully supports the recommendation that the Walvis Bay Municipality should undertake a Strategic Environmental Assessment of the planned development of the town, in parallel to the IUSDF. This should be undertaken before any new major developments (such as the Namport extension Phase 2) commence.

Monitoring of certain lagoon criteria requires an active and involved champion, and needs to be supported over the long term in both finances and logistics. While this ESIA can only instruct the proponent on what to do in the O-ESMP, it is necessary to secure the buy-in from other stakeholders who are likely to cause cumulative impacts. Admittedly it is difficult to secure these arrangements in this early stage of the project; however, this must be done. Also, the thresholds that would trigger a response need to be defined, to give the monitoring more context.

This ESIA is commended for highlighting the importance of joint responsibility for the cumulative impacts on the lagoon.

DETAILED REVIEW FORM

		Relevant? Yes/No	Judgement (C/A/I)	Comments
1. METHODOLOGY				
1.1	Does the report set out the assumptions and limitations of the study?	Y	C	Yes. These are brought together in Table 9, providing a useful summary of the information gaps. The limitations are honestly described and followed by a judgement on how the assessment deals with them. Fine.
1.2	Does the report clearly explain the methodology used in the EIA, public participation process and in each specialist study?	Y	C	Yes. Sec 3.1 to 3.3 cover this in text, accompanied by Fig 3.
1.3	Does the report indicate what data are inadequate or absent?	Y	C	Limitations, uncertainties and assumptions listed in Sec 3.
1.4	Does the EIA identify all relevant stakeholders including government ministries (including health and gender), interested parties, project affected persons, NGOs, vulnerable groups, women, etc?	Y	C	Stakeholder list covers all the relevant groups.
1.5	If so, was the stakeholder engagement process designed to effectively solicit their issues and concerns?	Y	C	The process to give input was thorough.
1.6	Were capacity building programmes required to enable informed stakeholder involvement and are they described?	N		Not necessary for this project.
1.7	Have the views of stakeholders been meaningfully incorporated into the findings of the EIA?	Y	A	Sec 4.1.33 describes features of the design and operations that will be included, based on public input. Construction of a project of this nature will always negatively impact on the nearest neighbours, and efforts have been made to ensure that they are consulted and involved, even if they cannot be fully

	Relevant? Yes/No	Judgement (C/A/I)	Comments
			<p>compensated for the changes.</p> <p>The temporary loss of community facilities at the sports grounds that will be demolished should be minimised. Ideally, replacement facilities should be constructed before the existing ones are demolished.</p>
<p>1.8 Does the report include lists of interested and affected parties consulted, as well as their original submissions and comments?</p>	Y	C	<p>Included.</p> <p>The project description (Sec 4.1.2) states that the Raft will hopefully be included in the overall project, but in the stakeholder comments (p180) it states that the Raft owners see only negative impacts from the project.</p>

		Relevant? Yes/No	Judgement (C/A/I)	Comments
2.	LEGAL, POLICY AND ADMINISTRATIVE REQUIREMENTS			
2.1	Have the relevant international treaties, conventions and agreements relating to biophysical, social and health issues been listed with reference to where and how these obligations have been met on this project?	Y	C	Yes. Sec 2.2 describes the Ramsar Convention and the CBD, the Abidjan Convention on protection of coastal environments, and the Benguela Current Commission. Relevance of these agreements is shown.
2.2	Have the relevant policies of the country relating to biophysical, social and health issues been listed with reference to where and how the obligations have been met on this project?	Y	C	Yes, in Sec 2.4 and 2.5. Information on population and Namibia's development aims are drawn from NDP5. Other policies such as Coastal Policy Green Paper; Draft Wetland Policy; and Environmental Health Policy are included – good. Walvis Bay IUSDF and WB Lagoon Integrated Environmental Management Plan included – good. The SEA of the Erongo and Kunene coastal areas (2010) is covered – good.
2.3	Have the relevant laws and regulations of the country relating to all environmental, social and resource issues been listed, with reference to project compliance?	Y	C	Yes, in Sec 2.3. <ul style="list-style-type: none"> • Envl Management Act and Regulations; • Water Act (1956) and the Water Resources Management Act (2013); • Marine Resources Act (2000); • NamPort Act; • Atmospheric Pollution Prevention Ordinance (1976); • Hazardous Substances Ordinance (1974); • Petrol Products and Energy Act (1990); • Draft Pollution Control and Waste Mgt Bill (1999). All fine.
2.4	Have the relevant standards and guidelines for compliance been listed including those relating to biophysical, social and health issues?	Y	C	The report states that it follows IFC standards.

		Relevant? Yes/No	Judgement (C/A/I)	Comments
2.5	Has the EIA administrative process been described together with project compliance?	Y	C	Yes. Fig 3 shows this and the process is described in Sec 3.2.
3. PROJECT DESCRIPTION				
<i>Land requirements</i>				
3.1	Has the land ownership status been described?	Y	C	The ownership of the site is well described in Sec 4.4. The majority of the land is owned by Walvis Bay Municipality. The marine (lagoon) component is Government land (MET). The Raft Restaurant is half-enclosed by the development, and is entirely within the red 'Lagoon Water Area' shown in Fig 7. Rezoning of the land is being handled by Urban Dynamics.
3.2	Has the land required for the project and any associated services, been described and clearly shown on an appropriately scaled map?	Y	C	The land take is fully described, and the maps are fine and detailed information on them is legible.
3.3	For a linear project, has the land corridor and need for earthworks been described and shown on an appropriately scaled map?	N		
3.4	Has the re-instatement after use of temporary landtake been described?	N		
3.5	Have local, regional and national plans e.g. SEAs, structure plans, integrated development plans, environmental action plans, zoning plans been reviewed in order to place the project into context?	Y	C	Yes. Reference is made to the Walvis Bay IUSDF and the WB Lagoon Management Plan. The SEA of the coastal zone of Erongo and Kunene Regions (DHI 2007) has been consulted and its advice has been incorporated into the design (e.g. Sec 4.1.25).

	Relevant? Yes/No	Judgement (C/A/I)	Comments	
<i>Project description</i>				
3.6	Have all the project components been described, including e.g. a process flow sheet, water balance, suitable diagrams and layout plans?	Y	C	<p>All the project components are described and well visualised on maps and graphics.</p> <p>Points that are relevant to the impact assessment: The tallest buildings will be 24 m high – approximately 7 storeys.</p> <p>An important component of the early work is moving the sewer line and then re-establishing an improved sewer pipe and pump for the area of the Waterfront and surrounds. This is described on p47.</p> <p>Design features that reflect issues raised by IAPs are included in the project description (Sec 4.6).</p> <p>Lighting is addressed in Sec 4.1.13 (p50). It states that minimal lighting will be required as construction will take place during daylight hours. This is relevant as a factor influencing disturbance to birds.</p>
3.7	Is there a life cycle analysis?	Y	C	<p>The report (Sec 4.8) sets out the stages of the development i.e. construction (3.5 years), operational phase (40 years) and decommissioning. Re-establishment of sports facilities that will be destroyed by the development is included in the schedule (Table 9).</p>
3.8	Have the technologies to be used been described, with a motivation as to how they comply with green growth principles?	Y	C	<p>Standard building materials will be used, and the report emphasises that materials will be locally sourced.</p> <p>Sec 4.1.29 describes aspects of passive building design to minimise electricity consumption, water-conservation features, and limited use of solar and wind power in the design. Good.</p>

		Relevant? Yes/No	Judgement (C/A/I)	Comments
3.9	Have the social issues related to the project been described e.g. number of employees, percent from local community, transportation, accommodation, support services, recreation facilities, employment structures, skills breakdown, training, skills transfer etc?	Y	C	Yes, social inputs are described in Sec 4.1.9. Construction staff is estimated at 500 people, of which 60-80% will be drawn locally.
<i>Waste and emissions</i>				
3.10	Have the sources, types and quantities of waste generated during different scenarios for construction and operation been estimated e.g. air emissions, process effluent, runoff, noise and vibrations, odour, liquid and solid waste?	Y	C	Building waste generated during demolition of the existing structures, then during construction, is described on p46, with estimation of quantities where known. Waste generation during the operational phase is described in Sec 4.1 31.
3.11	Have the predictions in the report been scientifically calculated, with the results clearly presented for different scenarios?	Y	C	The quantitative information from the specialist reports has been used and is clearly presented.
3.12	Has a risk assessment been performed, including the identification of exposure pathways, probability and consequences?	N		This typically refers to projects that emit large quantities of wastes eg noxious air emissions, radio-active wastes, or liquid effluents.
3.13	Does the report discuss ways in which the wastes can be reduced, recycled or re-used?	Y	C	Recycling and re-use of building materials is promoted where appropriate in the report.
3.14	Have the ways in which wastes will be stored, handled or treated prior to disposal been explained?	Y	C - A	Yes. One of the main wastes will be dredged material, which will be hauled to an industrial site approx. 5 km away, on the eastern edge of town. Fine. Dredging waste generated during the operational phase will be dumped in one of 5 possible sites. SAIEA considers the marine sites not preferred (definitely not A or B) but the Donkey Bay option might have some advantages in 'reinforcing' the spit. As stated, ECC must advise on the best option when details on the amounts and composition are known in future.

	Relevant? Yes/No	Judgement (C/A/I)	Comments
			Demolition and construction will generate other fairly standard construction wastes, as well as hazardous materials such as bitumen, paint, and asbestos. Handling and disposal of these wastes is described.
3.15 Has the receiving environment where such waste will be disposed, been identified and described?	Y	C	Dredging disposal options, and solid waste disposal sites, all addressed.
Project inputs			
3.16 Are the nature and quantities of materials needed during construction and operation, clearly indicated e.g. water, power, lubricants, raw materials, ore, structural components, fill, etc?	Y	A	Types of materials required are described. Fresh water, electricity, bulk services described in Sec 4.1.28 and 29. Where known, quantities are provided e.g. sewage 8,500 m3/day, water 280,000 l/day. The report states that flushing and cleaning of the Inner Marina is described in the ESMP, but there are no details about this in the O-ESMP.
3.17 Have the sites from where these materials will be sourced, been identified and assessed in terms of impacts, in the EIA report?	Y	C	Water and electricity sources described. The report states (p53) “locally sourced granite” and “natural stone sourced locally” will be used. Good.
3.18 Have the means of transporting materials, products, workers and visitors to and from the site during construction and operation, been explained?	Y	C	This is a fairly standard building project, with materials such as concrete and steel from typical building sources.
3.19 Has the project timetable been clearly set out for each project phase: construction, operation, decommissioning and closure?	Y	C	Yes, with a 2-phased approach over 3.5 years. Table 10 provides a tentative schedule of the construction activities.
4 ALTERNATIVES			
4.1 Were in project alternatives considered in the EA?	Y	C	Alternative sites were strategically considered and the selected site is justified. Alternative dredging material disposal sites were considered, with no final decision on which is selected. SAIEA considers sites A and B to be unsuitable.

	Relevant? Yes/No	Judgement (C/A/I)	Comments
			<p>Alternatives of no piling / hammer pile driving / vibratory pile driving were considered. Good.</p> <p>Alternatives for moving the sports facilities were considered and were explained during the public participation process. Good.</p>
4.2 If alternatives were considered, are the reasons for selecting the proposed alternative adequately described?	Y	A	<p>Table 12 provides information on the alternative sites and lists their advantages and disadvantages. Some of the advantages of Site A also apply to sites E and F ('in the bay area' and 'provide tourist facilities') so the table is biased towards the selected site, Site A. Nevertheless, the disadvantage of limited boat accessibility at Sites E and F rules them out, so SAIEA agrees that Site A is, in the end, the most preferred option.</p> <p>Fig 25 showing alternative design considerations for the Northern Area is not really helpful, but does show that planning has been ongoing for more than 10 years without any firm outcome.</p> <p>Fig 26 showing alternative designs for the proposed site is also too small and too low-res to be useful.</p>
4.3 If alternatives are described, have their main environmental, social and health impacts been compared clearly and objectively with those of the proposed project?	Y	A	<p>The advantages and disadvantages of the alternatives are compared in Table 12, based on social and bio-physical factors. (But note the criticism of bias in 4.2 above.)</p>
4.4 Has a prediction of the likely future environmental conditions in the absence of the project been developed (no go option)?	Y	C	<p>The no-go option is considered in Sec 5.2. The alternative waterfront and marina that has been proposed by Namport has been stalled for some time; this report states that it cannot be considered as a likely development. Therefore it does not come into the argument of what would develop in the absence of this</p>

	Relevant? Yes/No	Judgement (C/A/I)	Comments
			proposed waterfront. Fine.
5 DESCRIPTION OF THE BASELINE ENVIRONMENT			
5.1 Have the areas expected to be significantly affected by the various aspects of the project been indicated with the aid of suitable maps?	Y	C	<p>Yes, the area of influence is described in Sec 3.1.1.2 and shown in Fig 4. SAIEA agrees with the definition of the area of influence set at 1 km radius from the project for most of the study, but extended to the whole town for the socio-economics, and to the boundaries of the bay and lagoon for the marine environment. Some of the sites identified for disposal of dredging waste lie outside of this zone – this is stated (p47).</p> <p>The Scope of the assessment is described in Sec 3.1.1.1. SAIEA agrees with the issues that have been included, and with those that have been ‘scoped out’. The marine environment is very important (including sedimentation and hydrodynamics), as well as local economics such as the existing waterfront and tourism businesses.</p> <p>The Google Earth maps are clearly labelled in Figure 31, 32 and elsewhere, providing a thorough context for the information presented in this chapter.</p>
5.2 Have the land uses on the project site(s) and in the surrounding areas been described and their use and non-use values adequately assessed?	Y	C	The activities in the surroundings are described (Sec 6.9 – 6.13) and use of the existing sports facilities by the WB community is included.
5.3 Have the <i>biophysical</i> components of the environment likely to be affected by the project been identified and described sufficiently for the prediction of impacts?			
5.3.1 <i>Climate (wind, precipitation, temperature, evaporation, climate change scenarios etc)</i>	Y	C	Sec 6.16 broadly describes the climate of WBay, covering all the relevant features namely rainfall, fog, temperatures, winds (with useful wind roses).

	Relevant? Yes/No	Judgement (C/A/I)	Comments
5.3.2 <i>Geology (rock type, structure, geochemistry etc) and geomorphology</i>	Y	C	Covered in Sec 6.20
5.3.3 <i>Soils (fertility, erodibility, agricultural and rehabilitation potential)</i>	N		
5.3.4 <i>Topography (slopes, screening effects)</i>	Y	C	The flat, shore environment requires little description but there is relevant information in the section on the project site (Sec 4.3), and Sec 6.1.44 covers bathymetry well. The dynamic nature of the coastline is well described in Sec 6.1.45 and .46.
5.3.5 <i>Surface hydrology (flood lines, runoff, flows, supply, users, wetlands, dams, lakes, habitat for water-borne vectors, provision of ecosystem services, susceptibility to climate change)</i>	Y	C	The lagoon and tidal scenario is described in Sec 6.1.43.
5.3.6 <i>Groundwater (aquifers, yields, permeability, users, gradients etc)</i>	Y	C	Covered in Sec 6.17 and .18.
5.3.7 <i>Hydrochemistry (organic, inorganic, physical, suitability for various uses)</i>	Y	C	Lagoon water quality and marine sediments well covered in Sec 6.1.47 and .48. Heavy metal concentrations shown – all of them are lower than thresholds in the lagoon but higher in the harbour and bay. This is something to monitor in future.
5.3.8 <i>Air quality (ambient, indoor and seasonal)</i>	Y	C	Air quality is described in Sec 6.1.34. The report notes that a dedicated air quality survey was not done – SAIEA agrees, not necessary as this project will not generate significant air pollutants. Apart from construction-phase dust, air quality impacts are likely to be low, and the baseline description is therefore adequate.

	Relevant? Yes/No	Judgement (C/A/I)	Comments
5.3.9 <i>Terrestrial and aquatic ecology (vegetation and animal types, diversity, endemism, rarity value, alien and invasive spp, veld products and ecosystem services)</i>	Y	A	Birdlife, marine mammals in the lagoon, fish, and zoobenthos thoroughly covered in Sec 6.1.59.
5.3.10 <i>Other (specify)</i>	Y	A	Landscape and visual amenity covered in Sec 6.15.
5.4 Have the <i>social</i> components of the environment likely to be affected by the project been identified and described sufficiently for the prediction of impacts?			
5.4.1 <i>Social structure of local community including social status of women and girls and vulnerable groups</i>	N		
5.4.2 <i>Demographics</i>	Y	C	Latest population census figures for WBay and predictions described in Sec 6.1.24.
5.4.3 <i>Skills and education by gender</i>	N		
5.4.4 <i>Employment (current and future employment options for men and women)</i>	Y	C	Sec 6.1.26 describes employment statistics and trends.
5.4.5 <i>Presence of, and capacity of community facilities and services (e.g. clinics and hospitals, schools, water and sanitation, waste disposal, places of worship)</i>	Y	C	Facilities of relevance are the sports facilities, fully described in 6.1.32.
5.4.6 <i>Amenities e.g. recreation, bars, libraries</i>	N		
5.4.7 <i>Settlement patterns</i>	Y	C	Related to demographics, which are covered (Sec 6.1.9 and 6.1.24).
5.4.8 <i>Aesthetics (visual, noise, odour, sense of place, air quality, quality of life etc)</i>	Y	C	Visual aspects covered in Sec 6.165
5.4.9 <i>Current status and drivers of health (communicable and non-communicable diseases, vector-borne</i>	Y	C	The main health aspect that is relevant to this project is HIV, in Sec 6.1.25.

	Relevant? Yes/No	Judgement (C/A/I)	Comments
<i>diseases, existing pollution-induced diseases, injuries and accidents)</i>			
5.4.10 <i>Crime and community safety</i>	Y	A	Briefly addressed in Sec 6.1.27, but this is not a major factor in the assessment.
5.5 Have the <i>cultural</i> components of the environment likely to be affected by the project been identified and described sufficiently for the prediction of impacts?			
5.5.1 <i>Sites of spiritual and/or religious significance</i>	Y	C	Religious places near the site? – addressed in 6.1.33.
5.5.2 <i>Sites of cultural significance</i>	Y	C	Recreational value of lagoon described.
5.5.3 <i>Sites of historical significance</i>	Y	C	There is little of historic or archaeological value in the area of influence (6.1.33).
5.5.4 <i>Archaeological sites</i>	Y	C	See 5.5.3 above
5.5.5 <i>Other (specify)</i>			
5.6 Have the <i>economic</i> components of the environment likely to be affected by the project been identified and described sufficiently for the prediction of impacts?	Y	C	There is adequate information on the economic importance of WBay. The economics around the need and desirability of the proposed project are described in Sec 1.4.
5.6.1 <i>Local, regional and national economic indicators</i>			
5.6.2 <i>Multiplier effect</i>			
5.6.3 <i>Forward and backward linkages</i>			
5.6.4 <i>Local spending</i>			
5.6.5 <i>Sectoral strengthening</i>			
5.6.6 <i>Import and export potential</i>			
5.6.7 <i>Tax base and revenue generation</i>			

	Relevant? Yes/No	Judgement (C/A/I)	Comments
5.6.8 <i>Resource economics</i> 5.6.9 <i>Cost-benefit analysis</i>			
5.7 Have the authors of the EIA Report adequately consulted the latest literature and/or unpublished reports and/or data relevant to the study and cited their sources?	Y	C	Generally there is adequate reference to reliable information sources (although citing Travel News Namibia for geographic information is stretching the rules!).
5.8 Have the specialist studies been peer reviewed?	N	Don't know	This is not clarified. Peer review is not genuinely necessary for a fairly straight-forward project of this kind.
6 DESCRIPTION OF IMPACTS			
<i>Impact Identification</i>			
6.1 Have direct and indirect/ secondary effects of constructing, operating and, where relevant, after use or decommissioning of the project been clearly explained (including both positive and negative effects)?	Y	C	Well described in Sec 8.
6.2 Have the above types of impacts been investigated in so far as they affect the following biological, physical, health and social systems?			
6.2.1 <i>Air quality</i>	Y	C	Dust is addressed as a potential problem (Sec 8.1.9) with potential health impacts from inhalable dust (<PM10), but the duration of dust-causing activities will be relatively short. Dust suppression is stipulated for mitigation (p24 of C-EMP), as well as stopping dust-generating activities during winds and along the haul routes during transport of dredged material to the disposal site.
6.2.2 <i>Surface Water Resources (flow and quality)</i>	Y	C	The impact on hydrodynamics is addressed in Sec 8.6. The hydrodynamic study (App I) shows there is negligible impact on the flow rate and refreshment of lagoon water from the marina wall and inlet. This is a

	Relevant? Yes/No	Judgement (C/A/I)	Comments
			<p>surprising result but the specialist report appears to be thorough and the results can be believed. On this basis, SAIEA agrees with the rating of the impact as Minor.</p> <p>The impacts of the plume on turbidity and water quality created during dredging are assessed in Sec 8.1.16 to .20, with impact ratings of Low to Minor to Moderate. These findings, and the specific mitigations for reducing the impacts on the lagoon, reduce the concerns about negative effects of the dredging.</p>
6.2.3 <i>Ground water</i>	N		SAIEA agrees that this can be scoped out of the assessment.
6.2.4 <i>Soils</i>	N		
6.2.5 <i>Noise and vibration</i>	Y	C	Covered in Sec 8.1.8.
6.2.6 <i>Topography and geomorphology</i>	N		
6.2.7 <i>Vegetation</i>	Y	C	Little vegetation on site, all 'brown-field', therefore little impact.
6.2.8 <i>Terrestrial Ecology and biodiversity</i>	Y	C	Impacts on the bird life are assessed in Sec 8.7 which is drawn from the specialist study in Appendix H. The aspects are thoroughly covered and useful mitigations suggested. The decline in wader numbers in the lagoon is of great concern so this ESIA must be certain that the waterfront development does not exacerbate any of the causal factors.
6.2.9 <i>Aquatic ecology</i>	Y	C	<p>The impacts on marine mammals are assessed in Sec 8.8, drawn from the specialist study in Appendix J. Good.</p> <p>The importance of the lagoon's physical, chemical and benthic fauna status, that is emphasised in the Avian study, and the information drawn from the section on</p>

	Relevant? Yes/No	Judgement (C/A/I)	Comments
			<p>mammals, fish and inverts (p115) suggests that there are certain factors affecting the lagoon food resources for waders. E.g. “pollution ... within the harbour is thought to have reduced marine invert biodiversity significantly” (Wearne 2005); “high organic loads, high salinity and low tidal flushing at the southern end of the lagoon are leading to areas of lower biological activity” (Currie 1997).</p> <p>While the impacts of the Waterfront are predicted to be small, there are other external factors (cumulative impacts) that could have a compounding effect on the Ramsar site. Therefore monitoring of water quality, dredging effects, and level of flushing, must be included in the ESMP. The responsibility for this should be carried by the Waterfront company, the Raft, the salt company and Namport, all of which potentially have an impact on the ecological status of the lagoon. Monitoring provisions are included in Sec 8 and in the C-ESMP and O-ESMP.</p>
6.2.10 <i>Historic and cultural heritage</i>	N		
6.2.11 <i>Land use</i>	Y	C	Sec 8.1.7 addresses loss of community facilities and inconvenience to surrounding land uses.
6.2.12 <i>People and communities</i>	Y	C	<p>Impacts on other businesses in the vicinity are described and fairly evaluated (Sec 8.1.3). Positive impacts such as employment and improved tourism options and downstream opportunities also fairly evaluated (Sec 8.1.1 and .2). Loss of sporting facilities during the construction period, before they are re-established is described in Sec 8.1.7. Noise impacts described in Sec 8.1.9.</p> <p>Consideration of the negative impacts on tourism (e.g. reduced clients at the Raft and the Protea Hotel) is</p>

	Relevant? Yes/No	Judgement (C/A/I)	Comments
			addressed (Tables 26 and 27).
6.2.13 <i>Health</i>	Y	C	The project will improve the sewage line in this part of WBay (Sec 8.1.6), thereby partly compensating for some of the disruption the construction will cause. Other health impacts are unlikely (possibly dust, but construction period is short).
6.2.14 <i>Sense of place</i>	Y	C	Impacts on sense of place are adequately addressed in Sec 8.1.10.
6.2.15 <i>Transportation and traffic</i>	Y	C	Impacts on traffic are described and fairly assessed in Sec 8.1.5.
6.2.16 <i>A neighbouring country (transboundary impacts)</i>	N		Not relevant, although the transboundary movements of many WBay migrant waders could be considered to be very relevant in the broad context.
6.2.17 <i>Local, regional and national economic indicators</i>	Y	A	Impacts on house prices are assessed in Sec 8.1.4. The report considers that neighbouring house values will increase; some neighbouring residents think the opposite (p180).
6.2.18 <i>Crime and community safety</i>	Y	C	Crime is briefly assessed in Section 8.1.2.3, with the recognition that increased economic activity brings an influx of people and possibly increased crime.
6.3 Is the investigation of each type of impact appropriate to its importance for the decision, avoiding unnecessary information and concentrating mainly on the 5 key issues?	Y	C	A few insignificant issues are omitted from the assessment at the start. Impacts are rated in significance, and these are summarised and combined in Tables 39 and 40.
6.4 Are cumulative impacts considered?	Y	C	Cumulative impacts are thoroughly considered in Sec 8.9. The most significant cumulative impact will be the

	Relevant? Yes/No	Judgement (C/A/I)	Comments
			additional disruption to tidal flux and possible lagoon water contamination, on top of what has been caused by existing and future activities in the Bay, namely the saltworks, the Namport container terminal and harbour activities, the diversion weir in the Kuiseb delta, and tourism activities. These are summarised in Sec 8.1.43 and Table 41. Additional mitigations are proposed there.
6.5	Y	C	Traffic accidents are considered in Sec 8.1.5.1. Other accidents, involving damage to the lagoon environment, are probably less likely and are excluded from the assessment (Sec 3.1.1.1)
6.6	Y	C	The requirement for disaggregation is not very applicable to this ESIA, where gender discrepancies are not significant in the impacts. Differentiation based on affluent vs non-affluent sectors has been done where appropriate.
<i>Magnitude of Impacts</i>			
6.7	Y	C	All the impacts are described and assessed according to the methodology set out in Sec 7, which includes criteria such as sensitivity of the receptors, magnitude of the change, duration, reversability.
6.8	Y	C	See 6.7 above
6.9	Y	C	Quantifiable impacts such as noise, number of trucks, are quantified.
6.10	N		

	Relevant? Yes/No	Judgement (C/A/I)	Comments	
Data and Methods				
6.11	Have the methods to predict the nature, size and scale of impacts been described and are they appropriate to the importance of each projected impact?	Y	C	Well described in Sec 7.
6.12	Have the impacts of the environment on the construction and operation of the project been considered?	Y	C	Both phases fully addressed.
Evaluation of Impact Significance				
6.13	Does the information include a clear indication of which impacts may be significant and which may not?	Y	C	The graphics summarising impacts in each category such as social, economic, marine etc, are very helpful.
6.14	Has the significance of effects been discussed taking account of appropriate national and international standards or norms, where these are available?	Y	C	IFC standards have been provided and limitations set out.
6.15	Where there are no generally accepted standards or criteria for the evaluation of significance, is a clear distinction made between fact, assumption and professional judgement?	Y	A	Table 22 categorises and gives the criteria to arrive at the levels of significance. In most of the evaluations of significance in Sec 8, the value and sensitivity of the receptor, and the magnitude of change, are based on professional judgement, using guidance from the specialist's reports. This is not explicitly stated. The judgements are generally sound.
6.16	Have the magnitude, location and duration of the impacts been discussed in the context of the value, sensitivity and rarity of the resource or environment?	Y	C	Sensitivity of receptors is part of the assessment methodology.
7 MITIGATION				
Description of mitigation measures (in EIA)				
7.1	Has the mitigation of negative impacts been considered and, where feasible, have specific measures been proposed to address each impact?	Y	C	The identified impacts have either been minimised in the design or there are specific measures set out in the ESMPs.
7.2	Where mitigating measures are proposed, has the significance of any impact remaining after mitigation been described?	Y	C	Practical mitigation measures are proposed, and residual significance is assessed.

	Relevant? Yes/No	Judgement (C/A/I)	Comments	
			Moving the community sports facilities from their present situation to Jan Wilken stadium has raised public concerns (Appendix D). If and when the project gets a go-ahead, the first thing it should do is establish the new community sports facilities that it states will be done, so as to minimise the time that the community are deprived of these. Ideally, these should be established before the existing ones are demolished.	
7.3	Where appropriate, do mitigation methods considered include modification of project design, construction and operation, the replacement of facilities/ resources, and the creation of new resources?	Y	C	Many features of the design have taken advice from the specialist reports e.g. the precautions around dredging in the construction phase, layout of the marina wall.
7.4	Is it clear to what extent the mitigation methods are likely to be effective?	Y	C	SAIEA considers the suggested mitigations to be practical and useful for minimising impacts.
7.5	Has the EIA report clearly explained what the costs of mitigation are likely to be, and compared these to the benefits (including the costs of non-mitigation)?	Y	A - I	It is impossible to separate the costs of those mitigation measures that are included in the design. Costs for additional features, e.g. relocation of the sports facilities, will be carried by the proponent but these are not provided.
<i>Commitment to Mitigation</i>				
7.6	Have details of how the mitigation will be implemented and function over the time span for which they are necessary, been presented i.e. in an Environmental Management Plan?	Y	C	ESMPs are provided, and they are thorough.
<i>Monitoring Proposals</i>				
7.7	Has the EIA proposed practical monitoring arrangements to check the environmental impacts resulting from the implementation of the project and their conformity with the predictions made?	Y	C	Monitoring is set out in Sec 8 and in the ESMPs. If this is done consistently and over the long term it will provide a useful data set for tracking environmental health of the lagoon. Useful collaborations have been suggested e.g. with the twice-yearly lagoon bird census organised by CETN.

		Relevant? Yes/No	Judgement (C/A/I)	Comments
7.8	Has the EIA proposed Limits of Acceptable Change that the developer can use to track impacts and trigger management intervention?	Y	I	Not identified in the ESMPs, although thresholds for heavy metals in the water quality analyses are set out in Sec 6.1.46. These should still be developed, possibly in collaboration with the UNAM (Henties Bay campus) project that is monitoring a number of WB lagoon criteria.
7.9	Does the scale of any proposed monitoring arrangements correspond to the potential scale and significance of deviations from expected impacts?	Y	A	The monitoring set out in the ESMPs is mechanical and could easily 'fade out' over time if it is not sustained by a local champion. Ways to maintain public interest in the environmental quality of the lagoon need to be investigated e.g. by making public posters of the results of the bird and cetacean censuses, the need to keep water quality good so that heavy metals don't contaminate the oysters that are served up in the restaurants!
<i>Environmental Effects of Mitigation</i>				
7.10	Have any adverse environmental effects of mitigation measures been investigated and described?	Y	A	None identified. SAIEA agrees.
7.11	Has the potential for conflict between the benefits of mitigating measures and their adverse impacts been considered?	N		
8 NON-TECHNICAL SUMMARY				
8.1	Is there a non-technical summary that will easily be understood by a lay-person?	Y	C	Executive Summary is present.
8.2	Does the summary contain a brief but concise description of the project and the environment, an account of the main issues and mitigation measures to be undertaken, and a description of any remaining or residual impacts?	Y	C	All these components are well described.
8.3	Does the summary include a brief explanation of the overall approach to the assessment?	Y	C	Well explained
8.4	Does the summary provide an indication of the confidence which can be placed in the results?	Y	A	Level of confidence in statements is mostly not provided. In defence, it is difficult to indicate confidence levels when using professional judgement, and where the judgements are based on statements made by experts in the specialist studied. Therefore this is not judged as a major shortcoming of the ESIA.

	Relevant? Yes/No	Judgement (C/A/I)	Comments
8.5 Does the summary indicate whether the project is or is not environmentally acceptable.	Y	C	It states that the project should get environmental clearance. SAIEA agrees that the measures that are recommended, particularly in understanding and reducing the cumulative impacts, will reduce the negative aspects of the development and others in future. SAIEA therefore agrees with the judgement that the project is environmentally acceptable.
9 GENERAL APPROACH			
<i>Organisation of the information</i>			
9.1 Is the information logically arranged in sections?	Y	A	The ToC gives guidance to what is where, and Table 3 provides a clear description of each of the chapters. The assumptions and limitations are neatly tabulated in Sec 3.2.1. Subsection numbering is incorrect in most chapters.
9.2 Is the location of the information identified in an index or table of contents?	Y	C	ToC is present and correct.
9.3 When information from external sources has been introduced, has a full reference to the source been included?	Y	C	References are cited in the text and listed at the end of the report.
9.4 Does the report or appendices contain the Terms of Reference for the EA?	Y	C	Appendix C shows the aspects that MET required the ESIA to include. This was used as the ToR.
9.5 Are the credentials of the report authors and specialists presented, with a clear indication of their respective contributions?	Y	C	All ECC contributors and specialists are listed (Table 2) and their credentials provided.
<i>Presentation of the information</i>			
9.6 Has information and analysis been offered to support all conclusions drawn?	Y	C	Yes, the information in the specialist reports has been well used in the report and other experts who are familiar with the Lagoon have been consulted where appropriate.

	Relevant? Yes/No	Judgement (C/A/I)	Comments
9.7 Has information and analysis been presented so as to be comprehensible to the non-specialist, using maps, tables and graphical material as appropriate?	Y	A	The information is clearly written and the Google Earth maps are clearly annotated.
9.8 Are the maps at an appropriate scale, show co-ordinates, north sign, contours, drainage, settlement, landmarks, administrative boundaries etc in relation to the proposed project site?	Y	C	Yes
9.9 Has superfluous information (i.e. information not needed for the decision) been avoided?	Y	A	There is some superfluous information e.g. Sec 6.1.8 History of WBay,
9.10 Have prominence and emphasis been given to severe adverse impacts, to substantial environmental benefits, and to controversial issues?	Y	C	Important points are summarised in the Conclusions (Sec 10) and this ESIA has made strong recommendations to the Walvis Bay municipality and other stakeholders, particularly NamPort, about ongoing developments in the Bay and the need for rigorous environmental assessment. This is commended.
9.11 Is the information objective?	Y	C	Yes.
9.12 Are all the specialist studies and appendices present?	Y	C	Yes.