## 5.3 CONCLUDING STATEMENT ON ALTERNATIVES

Namibia has a huge potential to be an international logistics hub for the inland areas of Southern African Development Community (SADC). A milestone indicator of the realization of this goal, is the advanced expansion of the Port of Walvis Bay container trans-shipment hub.

Additionally, the Namibia Ports Authority considers several option to enhance handling capacity at the Port of Lüderitz including the development of a new deep-water port at Agra Point, and or the deepening of the current port (which is deemed to have great environmental implications / restriction) and or introducing a transshipment vessel facilities.

Despite the limited capacity to handle large bulk cargo, the Port of Lüderitz is considered the preferred export route for the proposed operation given its close proximity from the proposed animal holding facilities and feed supply. Alternative Haulage method considered entails the "Rail" or "Road" transport and the "Road Option" is recommended as far as enhancing animal welfare is concerned.

In case of social impacts, the assessment focused on third parties only (third parties include members of the public and other local and regional institutions) and did not assess health and safety impacts on workers because the assumption was made that these aspects are separately regulated by health and safety legislation, policies and standards.

The No-Action Alternative comparative assessment, suggests that environmental impacts of a future in which the proposed activities do not take place, may be good for the receiving environment because there will be no potential negative or positive environmental impacts associated with the proposed activities (import and exports trading).

## 5.4 ASSESSMENT OF IMPACTS AND MITIGATION

Mitigation measures to address the identified impacts are discussed in this section and included in more detail in the EERP report that is attached in **Appendix B.** In most cases (unless otherwise stated), these mitigation measures have been taken into account in the assessment of the significance of the mitigated impacts only

## 5.4.1 IMPACTS ON THE BIOPHYSICAL ENVIRONMENT

Potential impacts in respect to the Biophysical (Table 10) environment involves particularly the terrestrial and marine ecology (**Table 13**) environments and relate mainly to the handling and storage of the commodities both at the TransNamib and NamPort premises (both in Keetmanshoop and Aus respectively).

Table 13. Impact on the Terrestrial Environment – Construction of feedlots and transportation activities

Impact Event	Disturba	nces to the t	errestrial	ecology						
Description	ecology careful s located the majo	The two proposed Feedlots facilities could have implications on the terrestrial ecology particularly during the construction and operation phases. However, careful site selection drastically eliminated the impacts as both site are to be located within build-up environments, and on suitably zoned area. The use of on the major road and rail network further reduces potential implication on wildlife and livestock (road-kills).								
Nature	Impacts the follo Ger Sec	Impacts on the terrestrial environment as a result of the project could result from the following:  • Generation of dust contaminating the environment  • Secondary impacts such as Fauna and Flora Poaching  • Truck / Train – animal (Wild / Livestock) collisions, where the road / railway passes through farms and national parks.								
Phases: Phases during v						v; Significance				
assessment was carried				Decommissioning	g	t Clasura				
<ul> <li>Land preparation and construction activities</li> <li>Temporary lodging for construction staff</li> </ul>	<ul><li>Transp sheep</li><li>Operation</li><li>mainter</li></ul>	<ul> <li>Operational Phase</li> <li>Phase</li> <li>Post Closure</li> <li>Transportation of sheep by truck / rail</li> <li>Operation and maintenance of the feedlot facility</li> <li>N/A N/A N/A</li> </ul>								
Severity	Taken to scenario	gether, the . In the mitiga	disturbar nted scen	nces will have a high ario, many of these els, which reduces	disturbances can	be prevented				
Duration	The Sign life-time	ificance of th , however the	e potent identifie	ial impacts is subje d impact's duratio	ct to the propose n is incidental and	ed operation's d short-term.				
Spatial Scale			-	affected environm idents occurrence		_				
Probability	Very Lov	v, especially i	in respec	t to wildlife / livest ne Karas regions ha	ock collision as r	nost livestock				
Unmitigated	Severity H	Duration L	Spatial Scale M	Consequence H	Probability of Occurrence	Significance H				
Mitigated	Severity L	Duration L	Spatial Scale M	Consequence L	Probability of Occurrence	Significance M				
Conceptual Description of Mitigation Measures	<ul><li>incider</li><li>Dust a particu</li><li>All fac</li></ul>									

Table 14. Impact on the Terrestrial Environment – Sheep Welfare at Destination Country

Impact Event	Anthropogenic impacts of the Sheep species										
p. 12.2.1.		The global trade in live farm animals has more than quadrupled in size over the									
					tion means anim		•				
Description				_	ty when they re						
					campaigners to						
					New Zealand o		_	•			
		es were prop		Citire	New Zealand of	71050	ana bac rac	arer stringerit			
				igatio	ns and reports co	nduct	ed destinat	tion countries			
	Numerous exposes, investigations and reports conducted destination contains the produced evidence of severe and systemic animal cruelty and										
Nature		issues in overseas destinations which affect the Namibian beef indi									
. Tatal C	follows:										
		Damage to the national reputation									
					the 'value-add' b	eef m	arket				
Phases: Phases durir					cology impacts			ghted below:			
Significance assessmen	_				• .						
8					Decommissioning						
Construction Phase	Oper	ational Phas	e		Phase		Post	Closure			
	_	uction of									
N/A	Live	Sheep Exp	oort		N/A		1	N/A			
-	throug										
	Ports										
	Given th	e target mar	ket (H	alal/	Religious), requir	ing str	ict procedu	ires for which			
	the she	eep may b	е ехр	osed	to inhumane	condit	ions durin	ig slaughter.			
	Unfortu	nately, the	respon	rsibilit	y of TradePort	in resp	pect to ens	suring animal			
Severity	welfare	is limited to	Namib	ia and	l on the vessel, th	nus on	ce at destin	ation country			
		erity is very-h	_								
	_		-		l impacts on the						
Duration					y slaughtered loc	_					
		•		_	n Namibia the imp						
Cuetial Casle					heep export ma	arket	(exclude t	ne Namibian			
Spatial Scale		ion from the				lamihi:	a is foresse	n thus sunnly			
					livestock from Nullive addition sh						
Probability		•	_		o livestock expo						
Trobability	reputati	Orial darriage	Spati		O IIVESTOCK CAPOI		ability of	l l			
Unmitigated	Severity	Duration	Scal		Consequence		urrence	Significance			
Ommagacca	Н	I		VI N	Н	0 000	I	Н			
		_	Spati			Proba	ability of				
Mitigated	Severity	Duration	Scal		Consequence		urrence	Significance			
	M	L		L	Н		L	Н			
			with t	he O	IE Terrestrial An	imal H	lealth Code	(TAHC) and			
		•			mals Protection			• •			
		_		-	of 1972) is high						
Conceptual		ssing animal				•		•			
Description of		_			the proponent e	nters i	nto a bindir	ng agreement			
Mitigation Measures					uthority (as legis						
			•		the export opera			•			
	in ord	er to prom	ote th	e Na	mibian "Growth	-at-Ho	me" initiat	ive and thus			
	sustair	ning the loca	lecon	omic į	growth and harn	essing	job employ	/ment			
	Strict	monitoring	and re	eport	ing on the imp	lement	tation of t	he proposed			
					npetent authorit		-	-			
	Water	and Land R	eform	(Dire	ctorate of Veteri	inary S	Services) an	nd Ministry of			

Environment, Forestry and Tourism (Department of Environmental Affairs and
Forestry).

Table 15. Impact on the Ter	restrial Env	ironment – W	/aste Man	agement (Solid ar	nd Bio-matter)	J.				
Impact Event	Waste generation and disposal									
Description	Operational activities relating the delivery, and handling and feeding program present room for the generation of both solid waste (packaging material) and bio-waste (animal manure). Livestock in holding facilities tend to generate large amounts of manure and about 0.08% mortalities are record, thus consideration for practical mitigations were made.									
Nature	but may Pac hyc Bio Pos	<ul> <li>In general, feedlot facilities generates very little domestic solid waste includes but may not be limited to:</li> <li>Packing materials i.e. feed bags, veterinary cartons, wood pallets and minor hydrocarbons (fuels and lubricants)</li> <li>Bio-waste includes animal manure and dead carcasses</li> </ul>								
<b>Phases:</b> Phases during vassessment was carried						w; Significance				
Construction Phase		ational Phase		Decommissioning Phase	g	st Closure				
N/A		husbandes (Feeding a hary care)		N/A		N/A				
Severity	Taken to	gether, wast	•	ion in feedlots faci le is generated.	llities presents in	pacts that are				
Duration	l			npacts is bound to g-term in nature	the duration of	the proposed				
Spatial Scale	thus to I	Keetmanshoo	p and Aus	limited mainly to t Settlements, hen	ce very localized					
Probability	manure		o8% morta	g facilities tend t llities are record, a						
Unmitigated	Severity	Duration	Spatial Scale	Consequence	Probability of Occurrence	Significance				
	M	Н	L	M	M	Н				
Mitigated	Severity	Duration	Spatial Scale	Consequence	Probability of Occurrence	Significance				
5	L	L	L	L	L	M				
Conceptual Description of Mitigation Measures	collect     Hydrod     waste,     I respe     feeding     stockp     trucks.     dogs a     A suff     particu     respor	by the town carbon waste transported of to bio-mat g pens (or coiled, and it would while the cand other domicient number larly in the next to be the condition of the condition	or village shall be conto the near ter, manuduring round then be reasses conto sill and the near tential fur	e collected and te council solid waste ontained and stor irest waste-oil rec- re will be scraped tation cycles of the e sold in bulk to can be donated to hals rescue homes kits shall be acquice workshop faci- el and lubricant spoosal bin(s)	e units / departmed separate from ycling facility in Kevery six (6) mother sheep) and sustomers able to wildlife conservation.	ents in the domestic deetmanshoop onths from the appropriately o fetch it with ation facility or gically placed, are that timely				

Table for impact off the ma	rine Enviror	iment - Hand	ling of se	werage and dead o	arcas	s waste				
Impact Event	Disturba	nces to the n	narine ec	ology – marine pol	lution					
Description	leakage	Impacts in respect to Marine Ecology relates manly to accidental spillage or leakage of oil, fuel, or contamination of sea water and thus affecting the chemical or biological oxygen demand (COD or BOD, respectively).								
	Dissolved particulate matters as a result of dumping at sea could lead to diminished oxygen levels in seawater which forces mobile fauna to flee while sessile and sediment-dwelling organisms die.									
Nature	other mi	When oxygen is no more available for the break-down of discharged matter, other microbial communities take over, leading to emissions of sulphide but this is trues as far as hazardous chemical are concerned and not organic matter such as livestock carcasses or sewerage matter.								
Phases: Phases during assessment was carried							Significance			
Construction Phase	Opera	ational Phase		Decommissioning Phase	3	Post	Closure			
N/A	sheep • Handli	ling of de and disposing ng a ing of anin	g it nd	N/A			N/A			
Severity	medium on these prevents	if illegal sew vessels to le the animals	erage du eave the s from s	the potential risk formping is done. How sewerage in the pe lipping and serves on the severity in this	wever ens as a gr	, It is a comr it forms a n eat purpose	non practice nat. This mat			
Duration	The Sign life-time	ificance of th , however the	e potent e identifie	ial impacts is subjected impact's duration	ct to t n is inc	he proposed cidental and	short-term.			
Spatial Scale			-	affected environme idents occurrence i			-			
Probability	Very Lov engage i	w, illegal dison n such condu ing are slim (l	charge a ict, thus o ow).	t sea is highly per depending on choic	spect e of ca	ive as not a arrier operat	all operators			
Unmitigated	Severity L	Duration L	Spatial Scale M	Consequence		ability of urrence M	Significance H			
Mitigated	Severity	Duration	Spatial Scale	Consequence		ability of urrence	Significance			
Conceptual Description of Mitigation Measures	<ul> <li>It is hi respon operat</li> <li>Strict or relevar Comba 27 of recomm</li> </ul>	<ul> <li>L L M L L M</li> <li>Strict compliance with the EERP is recommended in respect to managing incidental events;</li> <li>It is highly recommended that TradePort Namibia negotiate and engage a responsible livestock carrier with a credible record (about 26, Appendix D) operators to select from.</li> <li>Strict compliance with the international polluter pays principle and other relevant legislations (Dumping at Sea Control Act 73 of 1980, Prevention and Combating of Pollution of the Sea by Oil Act 24 of 1991, Marine Resources Act 27 of 2000, and Namibian Ports Authorities Act 2 of 1994) is highly recommended in respect to addressing animal welfare concerns</li> <li>Equally, monitoring and reporting to this effect must be timely and in the</li> </ul>								

Table 17. Sea Environmental Impacts on the Sheep – On-the-vessels disease and veterinary care

Table 17. Sea Environmenta										
Impact Event				logy – marine pol						
Description	truck jou	ırneys (>20 h	ours, no fo	velfare for the trood or water) to t	he ports are the	first concern,				
			-	many weeks at se	•					
	prevent	animals from	comforta	bly lying down or a	accessing food an	d water.				
Nature	before t	Many animals do not adapt to the abrupt change in diet to pellet feed a few days before they are loaded on to the vessels and therefore starve or develop other illnesses. It is further perceived that, conditions such as salmonellosis, heat stress, pneumonia are prevalent, with high mortality in live sheep export vessels.								
Phases: Phases during assessment was carried			٠.		~ ~	; Significance				
				Decommissioning	g					
Construction Phase	Opera	ational Phase		Phase	Post	Closure				
N/A	Handlii	ng and care t	for	N/A		N/A				
		neep while	on							
		es at sea								
				d to communicable						
		•		on of consignmen		•				
Severity	country low.	(Namibia or N	Aiddle-Eas	t etc). In the mit	tigated scenario, t	the severity is				
		ificance of th	e notentia	ıl impacts is subje	rt to the propose	d operation's				
Duration				l impact's duration						
				ffected environme						
Spatial Scale				dents occurrence i						
				on choice of carr						
Probability				curring are slim (lo		-				
			Spatial		Probability of					
Unmitigated	Severity	Duration	Scale	Consequence	Occurrence	Significance				
	Н	L	L	Н	L	Н				
BASIS I I	Carranitus	Dunation	Spatial	C	Probability of	Cidnificance				
Mitigated	Severity	Duration	Scale	Consequence	Occurrence	Significance				
				M	L	M				
				sea transportation						
				d transportation The planned hold						
	-			control through	-					
	progra		i discase	control through	a 21 days silee	p quarantine				
			assessmen	t practice will be a	dopted to ensure	that only the				
				loaded for the ex						
		nolding facilit								
	Strict c	ompliance wi	th the OIE	Terrestrial Anima	l Health Code (TA	HC) and other				
	relevar	nt legislations	(Animals	Protection Act. 71	of 1962) and the A	Animals				
		_	-	of 1972) is highly r	•					
Conceptual		sing animal w				•				
Description of		· ·		rting to this effe	ct must he time	v and in the				
Mitigation Measures		riate form an	-	-	et mast be time	, and in the				
initigation measures				fall ill at any time	e. The vessels ha	ve registered				
				II diseased anima						
				to treat the anima	-					

## 5.4.2 IMPACTS ON THE SOCIO-ECONOMIC ENVIRONMENT

Table 18. Environmental Impact: Health and Safety Human both on Land and at Sea

Impact Event	Disturbances to the terrestrial ecology										
Description	Scientific evidence suggests that most common health risks on livestock vessels is related to noxious gases (particularly ammonia, hydrogen sulphide and carbon dioxide) resulting in irritant pollutants that have potential impacts on the comfort and health of both livestock and humans. Further, should there be insufficient ventilation ammonia levels as a result of high animal concentrations of waste cause severe respiratory conditions.  Due to the lack of proper protocols, there are risks to the people in the importing										
Nature	countrie poor hy disease	countries as well as on-board the vessels. If the long journeys are coupled with poor hygienic conditions, it result in crew exposure to potentially zoonotic disease creating a risk of disease transfer between the animals and the crew.									
<b>Phases:</b> Phases during v						w; Significance					
assessment was carried	out on the	орегацопаг р	nase wind	<b>Decommissioning</b>							
Construction Phase	Opera	ational Phase		Phase		t Closure					
N/A	Stocking feeding	ng densi	ty, en	N/A		N/A					
Severity	zoonotio mitigatio	disease and on the severity	l respirat y in this ca		y be severe. H	lowever, with					
Duration				al impacts is subje d impact's duratio							
Spatial Scale	entire tr	ansportation	route inci	ffected environm dents occurrence	may be highly loo	alized					
Probability			oth the st	there are clear gui ock and crew on-l	poard the vessels						
Unmitigated	Severity	Duration	Spatial Scale M	Consequence	Probability of Occurrence	Significance					
Mitigated	Severity	Duration	Spatial Scale	Consequence	Probability of Occurrence	Significance					
Conceptual Description of Mitigation Measures	incider It high vessel concer indicat On-boo Daily o of the The da - Dr - Flo - Re - Pa	<ul> <li>Strict compliance with the EERP is recommended in respect to managing incidental events;</li> <li>It highly recommended that measures to ensure sufficient ventilation on the vessel are employed in addition to good hygiene management, ppm concentrations for the respective gasses recorded during a given voyage indicate a low risk.</li> <li>On-board, medical emergency facilities must regularly checked and re-filled.</li> <li>Daily observation (monitoring of sheep condition) across each and every deck of the vessel) as indicator of potential system malfunctions is recommended. The daily report includes inter alia:         <ul> <li>Dry bulb temperature, wet bulb temperature and calculated humidity;</li> <li>Floor / pad conditions;</li> <li>Respiration rate;</li> <li>Panting scores;</li> <li>Mortalities for each deck, and mortalities for each class of sheep or cattle;</li> </ul> </li> </ul>									

Table 19. Impact on the Terrestrial Environment – Traffic and Noise

Impact Event	Disturbances to the terrestrial ecology								
Description					es could have in				
					construction an				
					liminated the in		as both s	site are to be	
					d for similar act		1		
					eceptors is limit loving equipme				
Nature					Noise during the				
Nature					when feed deli	-		-	
	-	to the feedlo		ccit v	vivien reca den	very an	ia new si	reep stock is	
Phases: Phases during v				gy imp	pacts apply are I	nighligh	ted below	v; Significance	
assessment was carried								, 6	
				D	Decommissionir	ng			
Construction Phase	Opera	ational Phase			Phase		Po	st Closure	
Land preparation	<ul> <li>Transp</li> </ul>		of •		ructure demolit				
and construction		by truck / rail			nd ground leveli	ng			
activities	Operat		ind		tivities	. 6			
Temporary lodging for construction		enance of t	the •		emporary lodgin			N/A	
for construction staff	reedio	t facility		ae	ecommissioning	Stall			
Starr	Taken to	ogether the	disturba	nces	will have a hig	sh seve	l rity in the	unmitigated	
Severity					, many of these				
,					which reduces t				
					mpacts is subjec		_		
Duration					npact's duratior				
					e as haulage ald				
6 (1.16.1					aspect is mainl	ly limite	d to the f	eedlot facility	
Spatial Scale		th far from re				حاد حاد			
Probability					s associated wit commissioning	in the p	roposea	operation are	
Frobability	iiiiiited t	o the constitu	Spatial		Commissioning	Probab	ility of		
Unmitigated	Severity	Duration	Scale		onsequence	Occur		Significance	
	L	L	L		M		L	Н	
			Spatial			Probab	ility of		
Mitigated	Severity	Duration	Scale	Co	onsequence	Occur	rence	Significance	
	L	L	L		L		L	Н	
			vith the	EER	RP is recomme	nded in	respect	to managing	
		ntal events;							
Conceptual					kept and maint	ained re	egularly w	rith mitigation	
Description of		res adopted a			stivitios must ba	. د ا ا ا ا	carriad -	ut during the	
Mitigation Measures		-	-	_	ctivities must be hoo (pm) week	-		out during the	
	-				al Clearance Cer	-	-	dlord code of	
							and Land	aiora code or	
	conduct at the port must be accordingly adhere to.								

Table 20. Impact on the Terrestrial Environment – Air Quality and Nuisance

Impact Event	Disturba	Disturbances to the terrestrial ecology								
Description	store ma of air po	One environmental downside of feedlots is that the way they concentrate and store manure often leads to high levels of local air and water pollution. In terms of air pollution and nuisance (Odour) to surrounding receptors, the generation of animal manure is a possible concern.								
Nature	environr concern attribute which if	Manure generation in livestock feedlot facility presents, depending on environmental factors such as geographical and climatic condition a number of concerns relating to release of odour and dust pollution. These particularly attributed to the confined nature of sheep handling and stockpiling of manure which if exposed to extended period of wet weather it generate odour.								
Phases: Phases during vassessment was carried							; Significance			
Construction Phase	Opera	ational Phase		Decommissionin Phase	ıg	Pos	t Closure			
<ul> <li>Land preparation and construction activities</li> <li>Temporary lodging for construction staff</li> </ul>	during vaccina mainte	<ul> <li>Handling of sheep during feeding and or vaccination activities</li> <li>maintenance of the feedlot facility i.e. scrapping of animal</li> <li>Structure demolition and ground leveling activities</li> <li>Temporary lodging for decommissioning staff</li> </ul>								
Severity	facilities	and given th	e dry Kar	relating to dust as Region climate, release of odour.						
Duration				al impacts is subje d impact's duration						
Spatial Scale	is prone towards	large wind e sensitive rece	vents wheptors.	lust generation are nich could blow bo	th the	dust and o	odour further			
Probability				on significantly lim onditions with pre						
Unmitigated	Severity L	Duration L	Spatial Scale M	Consequence L		ibility of irrence L	Significance M			
Mitigated	Severity	Duration	Spatial Scale	Consequence		bility of	Significance			
Conceptual Description of Mitigation Measures	incider  Dust a  and pa  A stake  mitigat	Strict compliance with the EERP is recommended in respect to managing incidental events;  Dust and odour suppression measures must be strictly observed as necessary and particularly during the construction and operation phases  A stakeholder complaint register must be kept and maintained regularly with mitigation measures adopted accordingly, recording all sources of ordour and or dust and areas mostly affected by these impacts.								

Table 21. Impact on the Economic Aspect

Impact Event	Disturbances on social and economic aspects										
Description		Potential economic gains that may never be realized if the proposed project activities does not go-ahead include: loss in income for both TransNamib and									
			-								
					loss of socio-ed			derived from			
					oort trading opp						
Nature		_			ocal socio-econo			-			
					Port operationa						
	-			_	leritz resulting i	-	ployment (po	ositively) and			
Dhagas, Dhagas during u		noise (potential negative on residence and tourism).									
<b>Phases:</b> Phases during which sources of terrestrial ecology impacts apply are highlighted below; Significance assessment was carried out on the operational phase which presents a long term risk.											
assessment was carried	out on the t	peracionar	Jilase (		ecommissioning		1310.				
Construction Phase	Opera	itional Phase	2		Phase		Post	Closure			
Land preparation and		ortation		• Stru		on	Retrench				
construction		odities by ra			ground leveli			nt and job			
activities		ng of wagor		activ	-	6		e to closure			
		ners at the P					103363 44				
				o, this	implies in the ca	ise w	here the acti	vity take not			
					s shall realize he						
Severity					h. However, wi						
	propose	d operation:	s, the s	everity	of unemployme	nt sh	all be reduce	d to medium.			
	The Sign	ificance of t	the pot	tential	impacts is subje	ct to	the propose	d operation's			
Duration	life-time	, with a long	-term	potenti	ial						
Spatial Scale	Low, loc	alized and o	nly lim	ited to	the two towns (	Lüde	ritz and Keet	manshoop)			
					espect to job cre						
	_	onstruction	phase	of Fee	dlots facilities a	nd lo	ng-term duri	ng operation			
Probability	phase										
			Spat		Consequenc		oability of				
Unmitigated	Severity	Duration	Sca	le	е	Oc	currence	Significance			
	Н	L		L	L		L	L			
			Spat		Consequenc		pability of				
Mitigated	Severity	Duration	Sca	le	е	Oc	currence	Significance			
	L	M+	٨	Λ+	H+		H+	H+			
	• It is c	ritical that t	imely	and co	ntinuous comm	unicat	tion and diss	emination of			
	inforr	mation with	the loc	al com	munity is ensure	d to a	lleviate pote	ntial sense of			
		_		_	ender equality a			_			
			of th	ne ber	nefits associate	d wi	th TradePo	rt Namibia's			
Conceptual	opera	ations									
Description of	_										
Mitigation Measures					s relating to mar						
					etmanshoop, A						
		omy at largare must be			provisions to A	ATTIRM	iative Action	i anu Labour			
	VVEII	are must be	ODSEI V	eu							