

ENVIRONMENTAL SCOPING ASSESSMENT AND ENVIRONMENTAL MANAGEMENT PLAN FOR THE STORAGE AND HANDLING OF INDUSTRIAL CARGO AND PRODUCTS IN WALVIS BAY

BACKGROUND INFORMATION DOCUMENT



Prepared by:



Prepared for:



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1 INTRODUCTION

Etosha Fishing Corporation (Pty) Ltd (the Proponent), has existing warehouses located at 5 Ben Amathila Street, Walvis Bay (Figure 1). The Proponent leases the warehouses to third party clients for the storage and handling of industrial cargo and a variety of products. Industrial cargo (e.g. metal ores, copper concentrates, copper cathodes, etc.) and products (e.g. urea, washing powder, rice, sugar, etc.) are received as break-bulk and palletised cargo, either for export via the Port of Walvis Bay, or as imported products to be distributed in Namibia or southern Africa. When the warehouses are not leased out, the Proponent uses it for storage of fish canning products related to their fish processing related operations (e.g. empty cans and ends, tomato paste, canned fish, etc.).

Geo Pollution Technologies (Pty) Ltd (GPT) was appointed by the Proponent to undertake an environmental assessment for the warehouses and their related operations. The environmental assessment is required in order to apply for an environmental clearance certificate (ECC) for the operations of the facility. The ECC application will be made in terms of the Environmental Management Act, Act No. 7 of 2007 (EMA). A scoping environmental impact assessment (EIA) report and an environmental management plan (EMP) are proposed to be submitted to the Ministry of Environment, Forestry and Tourism's Department of Environmental Affairs (DEA) in support of an application for an ECC. The environmental assessment will include all construction (including upgrades and maintenance) and operational activities associated with the warehouses.

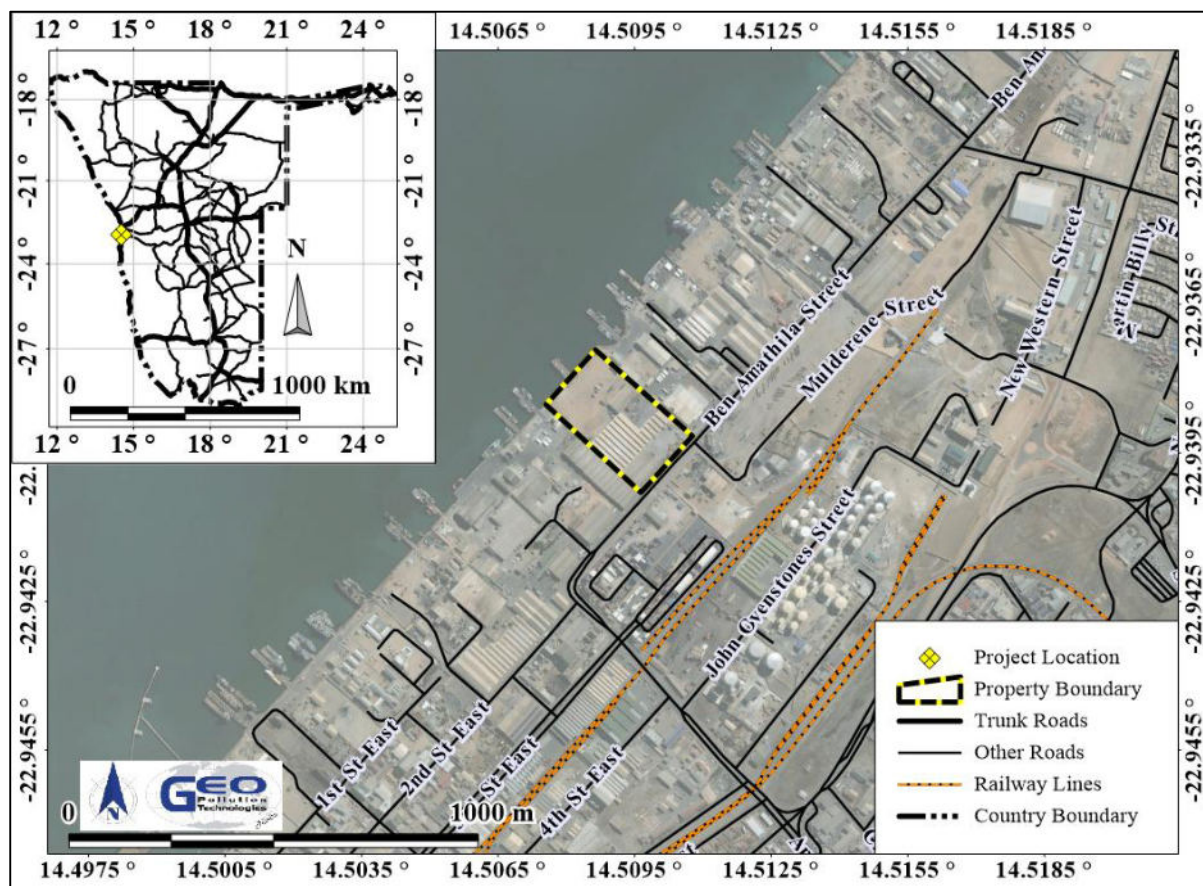


Figure 1 Project location

2 PURPOSE OF THE BID

With this background information document (BID), GPT aims to provide information to, and interact with, authorities and interested and affected parties (IAPs) regarding the project and the environmental assessment process. IAPs are therefore invited to register with GPT to:

- ◆ Be officially included in the list of registered IAPs for the project.
- ◆ Request additional information and clarifications.
- ◆ Provide information relevant to the proposed project which should be taken into account in the assessment of impacts.
- ◆ Share any comments, issues or concerns related to the project.
- ◆ Review and comment on the EIA, EMP and any other related submissions made to the DEA.

3 PROJECT DESCRIPTION

Activities which are considered for the environmental assessment are divided into the following phases: planning, construction (warehouse upgrades and continued maintenance), operational and decommissioning phases. A brief outline of expected activities for each phase is detailed below.

3.1 PLANNING PHASE

While planning for construction, operations, and decommissioning of the facilities, it is the responsibility of the Proponent to ensure they are, and remain, compliant with all legal requirements. The Proponent must also ensure that all required management measures are in place prior to, and during all phases, to ensure potential impacts and risk are minimised. Typical planning activities include:

- ◆ Obtain permits and approvals from local and national authorities.
- ◆ Finalise land lease agreements and ensure compliance to land use rights.
- ◆ Appoint a health, safety and environmental coordinator or similar to implement the EMP.
- ◆ Provide for a fund to cater for environmental incidents such as pollution clean-up and ecological restoration if ever required.
- ◆ Ensure all appointed contractors and employees enter into agreements which includes the EMP.
- ◆ Establish and / or maintain a reporting system to report on aspects of construction, operations and decommissioning as outlined in the EMP and as required by the DEA.

3.2 CONSTRUCTION

The property is a developed property with existing warehouses in the industrial area of Walvis Bay. No significant construction is this required, but periodic upgrades and/or maintenance are required to ensure it remains well kept and to ensure longevity of the structures. Key aspects include repairs and painting, replacement of worn or damaged infrastructure like plumbing, electrical supply and fittings, etc.

3.3 OPERATIONAL PHASE

A wide range of cargo will be stored in the warehouses. These may range from inert and harmless products to potentially hazardous chemicals with varying hazard characteristics. All incompatible products will be segregated at all times and storage and handling will be strictly according to material safety data sheet instructions. All personnel will be suitably trained to handle the products and equipment on site and such training will also include first aid and firefighting training of selected personnel. Products will be received by truck and will mostly be break-bulk and palletised cargo. All ship loading/unloading activities in the Port of Walvis Bay will be handled by Namport or third party stevedores and thus will be outside of the scope of the environmental assessment.

Administrative tasks, site security and cleaning of the premises will continue on a daily basis to ensure the effective and clean operations of the facility. Environmental compliance monitoring and public liaison will continue throughout operations.

3.4 DECOMMISSIONING PHASE

Decommissioning of the entire facility is not foreseen during the validity of the ECC. Decommissioning will however be assessed, since activities like the removal of old infrastructure during construction and maintenance activities or upgrades form part of decommissioning. Where decommissioning occur, rehabilitation of the area may be required. Decommissioning will entail partial or complete removal of all infrastructure, including buildings and underground infrastructure. After decommissioning, any pollution present on the site must be removed or remediated.

3.5 PRELIMINARY IDENTIFIED IMPACTS

During the preparation of the EIA and EMP, all components of the environment will be considered. However, only those components which are, or may be, significantly impacted, or are deemed to be sensitive, will be assessed. These include the following:

- ◆ Human component (employee and visitor health and safety).
- ◆ Infrastructure (aesthetics, fire, integrity, etc.).
- ◆ Neighbours (dust, noise, aesthetics, waste, traffic).
- ◆ Groundwater, surface water and soil (ore and fertilizer dust, hydrocarbon spills, effluent generation and disposal, waste, pollutants).
- ◆ Ecosystem and biodiversity (dust, spilled products, pollutants).
- ◆ Social and cultural aspects (demographic processes, sense of place, community services etc.).
- ◆ Economic characteristics (revenue generation, employment, training, skills, revenue).

4 PUBLIC CONSULTATION

Geo Pollution Technologies invites all IAPs to provide in writing, any issues and suggestions regarding the project. This correspondence must include:

- ◆ Name and surname
- ◆ Organization represented or private interest
- ◆ Position in the organization
- ◆ Contact details
- ◆ Any direct business, financial, personal or other interest which you may have in the approval or refusal of the application

All contributions by IAPs become public knowledge and will be circulated along with the reports as per the EMA requirements. The comments, inputs and suggestions will also be submitted to the DEA along with how any issues have been addressed in the EIA. The public participation process will remain ongoing during the environmental assessment. However, all comments and concerns should be provided timeously to ensure incorporation into the final report. The deadline for submission of comments will be communicated to all registered IAPs.

For any additional information the project team may be contacted at:



Your Rights as an IAP according to the Environmental Management Act, No7 of 2007, Government Notice No 30 (Environmental Impact Assessment Regulations)

Section 23.

- (1) A registered interested or affected party is entitled to comment in writing, on all written submissions made to the Environmental Commissioner by the applicant responsible for the application, and to bring to the attention of the Environmental Commissioner any issues which that party, believes may be of significance to the consideration of the application, as long as -*
 - (a) comments are submitted within 7 days of notification of an application or receiving access to a scoping report or an assessment report;*
 - (b) the interested and affected party discloses any direct business, financial, personal or other interest which that party may have in the approval or refusal of the application.*
- (2) Before the applicant submits a report compiled in terms of these regulations to the Environmental Commissioner, the applicant must give registered interested and affected parties access to, and an opportunity to comment in writing on the report.*
- (3) Reports referred to in sub regulation (2) include*
 - (a) scoping reports;*
 - (b) scoping reports amended and resubmitted;*
 - (c) assessment reports; and*
 - (d) assessment reports amended and resubmitted.*
- (4) Any written comments received by the applicant from a registered interested or affected party must accompany the report when the report is submitted to the Environmental Commissioner.*
- (5) A registered interested or affected party may comment on any final report that is submitted by a specialist reviewer for the purposes of these regulations where the report contains substantive information which has not previously been made available to a registered interested or affected party.*

Section 24:

The applicant responsible for an application must ensure that the comments of interested and affected parties are recorded in reports submitted to the Environmental Commissioner in terms of these regulations, and comments by interested and affected parties on a report which is to be submitted to the Environmental Commissioner may be attached to the report without recording those comments in the report itself.