SKORPIO ALTERNATIVE FUELS NAMIBIA (PTY) LTD

The Proposed Construction and Operation of a Seaweed Aquaculture Pilot Project and its Associated Infrastructure (Ponds, Water Supply Pipelines, Solar pv, 2x Wind Turbines and a Production Facility)

Wlotzkasbaken Settlement, Erongo Region, Namibia

September 2025

INFORMATION SHARING MEETING - MINUTES

Meeting - Public and Wlotzkasbaken Community Members Meeting

Date:	18 June 2025
Location:	Eromgo Regional Council Office in Wlotzkasbaken
Time:	16h00 - 18h00
Purpose:	• Present the Environmental Impact Assessment (EIA) process being followed. • Explain the motivation and overview of the proposed Project. • Allow Orano to provide input into the EIA process and Scoping Report.
Attendees (Key Stakeholders)	See full attendance register in Appendix A.
Facilitator:	Mr. Immanuel Katali (IK)
Client Representative:	Mr. Sacky Nalusha (SN) and Johannes Bochdalfsky (JB)

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1 PRESENTATION

IK the independent Environmental Practitioner conducting the EIA process welcomed all to the meeting and introduced SN and JB. IK then took the floor for his presentation.

IK presented the project background/motivation as well as the description and location of the proposed project and various project components.

IK also presented the ESIA process being followed and explained the potential key social and environmental issues that were identified as part of the initial stages of the ESIA process. He ended the presentation by discussing the way forward regarding the ESIA process.

2 DISCUSSION

Any issues and concerns raised during the meeting have been recorded in Table 1. Where a response was provided, the relevant response has also been included in Table 1.

Issue raised/ comment during meeting	Response
Why is this site selected considering the sensitive lichen fields? Will you include the alternatives in the report? Is there site 2 or site 3?	The Seaweed Aquaculture site is selected due to the following factors: • Proximity to the existing Orano/Erongo Desalination Plant, which is a key component in the project, for the supply of fresh water for green hydrogen production. • Proximity to the existing substation, whereby surplus electricity generated from wave, wind and solar can be fed into the grid to supply electricity to nearby communities. • Proximity to the Walvis Bay Port, where the biofuels and e-fuels are proposed to be transported to supply vessels with these biofuels, therefore making it financially viable to transport the fuels to the port. • The site is situated on a significantly low elevation (20 m above sea level), which would make it suitable, viable and efficient to pump water from the sea to the aquaculture ponds, as also evident from the Erongo Desalination Water Pumping activities. • The Seaweed (Ulva) is widely found in the area, creating an abundance supply of seaweed for harvesting and therefore contributing to the sustainability of the Project. • This section is free of dunes (compared to the stretch between Swakopmund and Walvis Bay, which otherwise would require SKORPIoN to transverse them with the pipelines or threated to bury the project as they move.
We are concerned with the Noise that will come from the Wind turbines. On a normal day, would you say we would be hearing the noise of the turbines from the settlement?	As per studies, residential reports from within 1km of Wind Parks complain of stress and anxiety created by the noise. However, given that the proposed turbines are located 4-5km from the Wlotzkasbaken community, the noise impact on the community is not an issue.

Will the workforce be living on site with their families?	The project will recruit mainly locals, meaning the people already living either in Henties Bay or Swakopmund and definitely not setting up a village or any accommodation on site. The workforce will be commuting daily.
What is the time-frame?	We are targeting construction in 2026 and commissioning in 2027. However, pending the EIA process and funding.
Have you done a financial feasibility report? When do you expect the financial feasibility to be available and will it also be available?	This ESIA is required to unlock the funds to commence with the financial feasibility. The financial feasibility will be conducted prior commencement of the activities.
Do you already have an energy generation license?	The ESIA is required prior to applying for an energy generation license or as part of the energy generation license requirements.
How is the seaweed harvested and where do you get it from?	Seaweed aquaculture is a practice well established in Namibia (Luderitz) and many parts of the world. The project location is selected based on the abundance Ulva lactuca that can be found on this part of the Namibian coastline. Cultivating seaweed might be preferable to wild harvesting as it does not remove algal biomass from the system and is simpler to monitor and regulate. Two (2) 508mm pipelines are proposed to deliver 42,000 cbm of seawater per day to the ponds. It consists of raceway ponds with paddlewheel mix, that will circulate the algal biomass and prevent the sedimentation, settling and subsequent attaching to the pond liner. Each pond will require daily water quality monitoring. The monitoring team will close an aggregation device in the ponds due for harvest on any specific day, with the following harvest teams 'scooping' the seaweed from the water into draining trailers behind tractors. Paddlewheels are commonly used in raceway ponds to circulate and mix the water, ensuring seaweed is evenly distributed and exposed to light and nutrients. This mixing is crucial for efficient seaweed growth and preventing it from settling at the bottom of the pond. The paddle wheels are driven by electric motors, with app. 2.2kW each, powered by on-site installed renewable energy. The paddlewheels will require 120 to 240kW from the renewable energy.
Can you give us a description of each of the components or process flow diagrams and specifications of the turbines?	Lighting devices will be installed on the devices to indicate the presence of the devices.
Can you elaborate on the Steel Jetty?	The aim is to install a water intake adjacent to the current Erongo Desalination Plant seawater intake. The proposed scheme would comprise of the following: ◆ A 288m long access jetty with steel piles and a steel and timber deck. This is assumed to reach the -3m CD water depth. ◆ The jetty is assumed to be founded directly on rock for most of its length with only a short section of sandy beach near the shore. ◆ An earthworks approach embankment to allow access onto the jetty ◆ Twin 508mm diameter steel intake pipes laid directly on the seabed one on each side of the jetty. ◆ The pipes will have a continuous concrete protective coating and will have individual weight collars placed over them to ensure stability on the seabed.
Can I suggest a fund to rehabilitate the facility in the end? What sort of rehabilitation will be done?	Rehabilitation will be undertaken as per the following: • All construction sites should be photographed (1) before commencement, (2) after completion and (3) after rehabilitation of the activities.

	• All bunding areas, equipment, waste, ablution, temporary structures, stockpiles must be removed and areas to be rehabilitated. • All disturbed areas shall be reshaped to theoretical contours; as close as possible to the natural conditions before construction commenced, including, detours, and temporary access routes. • All cuttings must be shaped with a slope to provide a natural appearance, without having to destroy significant vegetation on top of the slope. Borrow pits need also be rehabilitated during rehabilitation phase.
The report mentions that management and mitigation measures are stipulated in the ESMP – however, the ESMP document was not provided for review. Therefore, no comment can be given on whether the provisions of the ESMP are suitable for the mitigation and management of impacts.	The power cables in the sea will be placed on the seabed. Only inland will it be underground.

3 DEADLINE

Initial comments must reach I.N.K by 7 July 2025.

4 CLOSE

IK thanked everyone for attending the meeting and encouraged those with more questions to ask them after the meeting or forward them to I.N.K as per the details provided. He closed the meeting.

Attendance Register

I.N.K Enviro Consultants

Reg No. CC/2015/01895

SCORPIo ALTERNATIVE FUELS NAMIBIA (PTY) LTD - Seaweed Aquaculture Farm

Public Engagement Meeting – 18 June 2025

ATTENDANCE REGISTER

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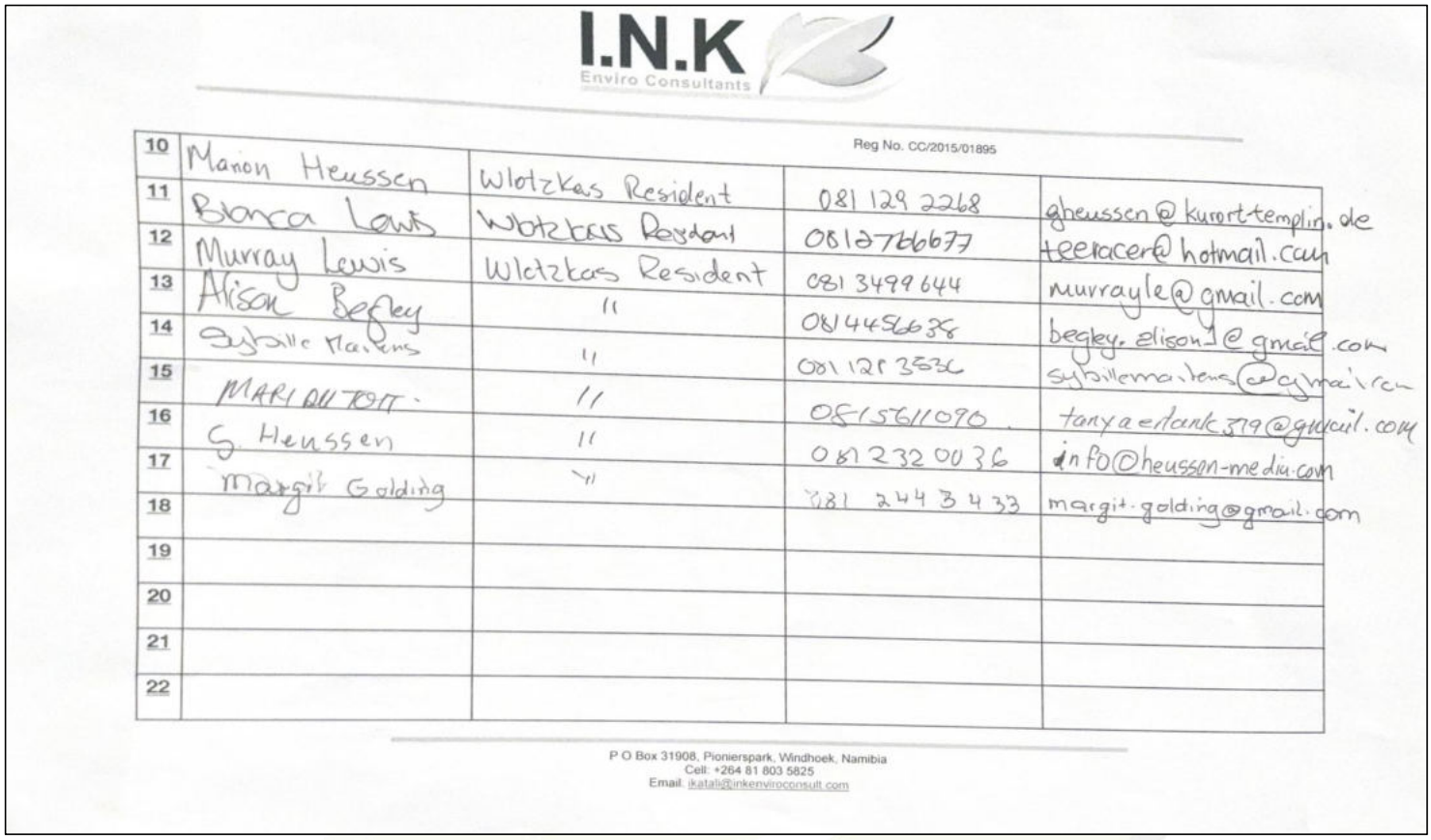

I.N.K
Enviro Consultants

Reg No. CC/2015/01895

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Meeting Photos

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Newspaper Adverts - Die Republikein (9 and 16 June 2025), The Namibian Sun (9 and 16 June 2025), Allgemeine Zeitung (9 and 16 June 2025)

2 Republikein Sun Allgemeine Zeitung Market Watch MONDAY 9 JUNE 2025

Economic Indicators
Exchange Rates
Forward Cover

Currency	Spot	Currency	Spot	Currency	1M	3M	6M	12M
USD/NAD	17.764	NAD/AUD	0.006	USD/ZAR	18.26	18.123	18.765	18.954
EUR/NAD	20.256	NAD/NZD	0.093	EURO/ZAR	20.634	19.548	19.03	20.05
GBP/NAD	24.009	NAD/BWP	0.745	GBP/ZAR	24.296	23.35	22.921	24.25
NAD/CHF	0.047	NAD/JPY	7.809	ZAR/JPY	7.849	8.161	8.321	8.206

*Effective rate (withholding tax still to be applied)

DATE: 06/06/2025- 14:13 PM

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Understanding the legal consequences of default

Demystifying the risk of credit

EDDIE KING

Understanding the legal consequences of financial default is essential for anyone managing personal or business-related debt.

Default occurs when a debtor fails to meet the legal obligations of a loan, typically by not making the required payments. This failure can trigger a series of legal actions with long-term financial impacts. Before initiating legal action, a creditor will contact the debtor to request payment.

This approach allows the debtor to settle the debt or arrange payments and avoid legal proceedings. Legal Action and Collection Process: Creditors may initiate legal proceedings to recover the debt when a default occurs. This involves issuing a summons against the debtor, eventually leading to a judgment being granted against the debtor. Once a judgment is in place, creditors have several methods available for debt collection, including wage garnishment, where a portion of the debtor's earnings is withheld to pay off the debt, or proceeding to attach the debtor's assets.

In all legal action, the debtor will also be responsible for the legal costs the creditor incurred in initiating and settling the case. Foreclosure and Repossession: For secured debts like home mortgages or car loans, defaulting can lead to foreclosure or repossession.

Foreclosure refers to the process by which a lender takes possession of a property after the borrower fails to keep up mortgage payments through the legal process. Repossession involves reclaiming property used as collateral for a loan when payments are not made through a legal process.

Both methods result in the debtor losing ownership of valuable assets and can significantly affect credit standings.

Auction of Assets: In some cases, seized assets may be sold at auction. The proceeds from these auctions are used to pay off the debt owed. However, suppose the auction does not recover the total amount of the debt owed. In that case, the debtor will still be responsible and liable for the remaining balance.

Credit Impact: One of the most enduring consequences of default is the negative impact on a debtor's credit score through listings on TIC. Depending on credit reporting standards, a default can stay on a credit report for up to five years.

This mark can hinder the debtor's ability to obtain new credit, secure rental properties, or even gain employment. Navigating Legal Outcomes: Awareness of the potential legal actions and consequences of default is crucial for debt management.

For those facing financial difficulty, it is advisable to seek guidance from a financial advisor, legal counsel, or the bank (creditor) to explore all available options, such as restructuring debt or negotiating with creditors, before default becomes inevitable.

Default Interest: Legal action is often the last resort for creditors due to its significant impact on the debtor's financial wellness.

When the creditor proceeds with legal action, default or penalty interest is added to the debtor's account, increasing exposure. To avoid this, you should always approach your financial institution or other creditor to try to resolve the default.

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TENDER OPE/02/2025

REQUEST FOR ELECTRICAL CONSTRUCTION SERVICES FOR HIGH CAPACITY 11kV LINES AND 400V UNDERGROUND ELECTRICAL RETICULATION IN OTHINGO VILLAGE SOUTH AND 25M LIGHTING MASTS

Closing Date	27 June 2025
Voluntary Briefing	A site visit will be held on Friday, 13 June 2025 at Othingo Village South, 09:00 am
Document Fees	N$800.00 (non-refundable)
Enquiries	Mr. Leon Hanekom (lhanekom@ope.com.na) Mr. Kamati Mbangula (kmbangula@ope.com.na) Tel: +264-(0)65-220 229

Documents in a sealed envelope clearly marked "TENDER NO OPE/02/2025" addressed to the Chairperson of the Tender Committee, must be placed in the tender box at the Oshakati Premier Electric Head Office or be posted to the Chairperson of the Tender Committee, PO Box 1584, Oshakati, to reach him at the latest by 10:00 on FRIDAY, 27 June 2025.

Please note documents received after the closing date and time will not be considered for evaluation.

VACANCIES

- Creditor and Payments Officer
- Administration Specialist

Closing date for positions is Monday, 23 June 2025

FOR MORE INFORMATION PLEASE VISIT:
https://sanlam.com.na/careers.html

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I.N.K

NOTICE OF ENVIRONMENTAL IMPACT ASSESSMENT AND PUBLIC PARTICIPATION PROCESS

SKOPION

SKOPION Alternative Fuels Namibia (Pty) Ltd (SKOPION) hereby gives notice to all potential interested and affected Parties, that it is to undertake applications for Environmental Clearance Certificate, Environmental Management Act, 7 of 2007 and Regulations 19 and 21 of the EIA Regulations (January 2012) will be made as per the following:

PROPONENT: SKOPION Alternative Fuels Namibia (Pty) Ltd

PROJECT: The proposed and listed activities have the following components and infrastructure:

NATURE OF THE PROPOSED ACTIVITY:

LOCATION OF THE PROPOSED ACTIVITY:

INDEPENDENT ENVIRONMENTAL ASSESSMENT PRACTITIONER:

NOTIFICATIONS AND INFORMATION:

DETAILS ON THE INFORMATION SHARING MEETING:

2 Republikein Sun Allgemeine Zeitung Market Watch MONDAY 16 JUNE 2025

>> *Loses 1.2m broadcast subscribers in a year*

MultiChoice reports headline loss as DStv subscriber numbers dwindle

Loses 1.2m broadcast subscribers in a year.

As anticipated, struggling pay-TV operator MultiChoice reported a loss for the year ended 31 March – coming in with an adjusted core headline loss of R800 million, down from headline earnings of R1.3 billion a year prior.

In its results, published on Wednesday, the group said it lost 8% or 1.2 million linear (broadcast) subscribers over the year, to 14.5 million. The loss was evenly split between its South African and Rest of Africa subscribers.

It also had to absorb a R10.2 billion negative impact on its top line due to local currency depreciation against the dollar.

Price hikes, competition

The group, which is under pressure from streaming rivals such as Netflix, said the past two financial years have brought significant financial disruption to economies, businesses, and consumers across sub-Saharan Africa due to challenging macroeconomic conditions.

The group's overall performance was materially affected by structural changes in the video-entertainment industry, including the rise of piracy, streaming services, and social media.

It reported a 9% drop in revenue to R50.8 billion, attributed to an 11% decrease in subscription income due to price hikes, as well as the sale of a 60% stake in its insurance business.

Showmax and DStv

MultiChoice's streaming service, Showmax, grew active paying subscribers by 44%, gaining regional market share after relaunching the platform over a year ago.

The group said its trading profit, which declined by R3.8 billion or 49% year-on-year to R4 billion, was materially affected by the R2.3 billion organic increase in trading losses in Showmax and the R5.3 billion in foreign currency revenue losses.

Showmax targets 44 markets across sub-Saharan Africa with the ambition of becoming the leading streaming platform on the continent.

Young South Africans are scrolling, streaming and swiping more than ever before.

The group said DStv Stream subscribers increased by 38%, with revenues up 48%. This underscores the shift to streaming as broadband penetration grows, it said.

MultiChoice also focused on growing DStv Internet, a fixed wireless access service, within the fixed-wireless LTE space, which resulted in DStv Internet subscribers growing 45%, while revenues increased 83%.

Outlook

In the year ahead, management aims to stabilise revenue in its video businesses through targeted customer retention efforts, while driving strong topline growth across its interactive entertainment, fintech, and insurance investments.

The group will also focus on improving operating efficiency, reducing costs, and optimising working capital to safeguard profitability and cash flow, while continuing to work closely with Canal+ to successfully complete its mandatory offer, which is expected to deliver significant long-term value for both companies and their stakeholders.

Last year, Canal+ made a mandatory offer to acquire the MultiChoice shares it does not own, for a consideration of R125 per share.

Recently, the Competition Commission has recommended that the Competition Tribunal conditionally approve Canal+'s proposed acquisition of the MultiChoice Group.

As part of MultiChoice's response to a changing trading environment, management has set a cost-saving target of R2 billion for the financial year 2026.

Backed by these topline and cost control measures, it aims to achieve margins in the mid 20s for MultiChoice South Africa, return MultiChoice Africa to profitability with limited funding and reduce trading losses at Showmax.

"Our performance reflects both the challenges we've faced and the resilience of our teams," said MultiChoice Group CEO Calvo Mawela in a statement.

"While macroeconomic pressures and currency volatility have weighed on our results, our disciplined execution, cost management and investment in new long-term growth opportunities position us well for the future."

FILE PHOTO: A MultiChoice logo is displayed outside the company's building in Cape Town, South Africa.

Wlotzkasbaken Residents Invitation

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Reg No. CC/2015/01895

11 June 2025

PUBLIC MEETING INVITATION

ESIA FOR THE PROPOSED LAND-BASED SEAWEED AQUACULTURE FARM FOR BIOFUEL PRODUCTION (BIOMETHANE AND E-METHANOL) AND ITS ASSOCIATED INFRASTRUCTURE

Dear Wlotzkasbaken Residents

SKORPIo ALTERNATIVE FUELS NAMIBIA (PTY) LTD (SKORPIoN) intends to submit an application for an Environmental Clearance Certificate (ECC) pertaining to their proposed land-based seaweed aquaculture farm dedicated to biofuel production (biomethane and E-methanol) along with its associated infrastructure.

The proposed project is situated along the Namibian coastline in Wlozkasbaken Settlement between Swakopmund and Henties Bay, in close proximity to the Erongo Desalination Plant.

Prior to the commencement of the proposed activities, an application for environmental clearance will be submitted in terms of the Environmental Management Act, 7 of 2007 and Regulations 19 and 21 of the EIA Regulations (January 2012) to the MEFT - Department of Environmental Affairs (DEA).

I.N.K Enviro Consultants cc (I.N.K), is an independent firm of environmental consultants that has been appointed by SKORPIoN to manage the Environmental and Social Impact Assessment (ESIA) process for the above-mentioned activities.

You are hereby invited to attend an information sharing meeting meeting as per the following:

- Date: Wednesday, 18 June 2025
- Venue: Erongo Regional Council Office Building in Wlotzkasbaken Settlement
- Time: 16h00 pm

Yours Sincerely,

Immanuel N. Katali

Project Lead Consultant

Director: I.N Katali, B.Arts (Hons) Geography, Environmental Studies and Sociology (University of Namibia)

Stakeholders

	Name	Position	Email	Cell/Tel No
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Ministry of Environment, Forestry and Tourism				
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SKORPIoN ALTERNATIVE FUELS NAMIBIA (PTY) LTD

ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT (ESIA) FOR THE PROPOSED SEAWEED AQUACULTURE FARM AND ITS ASSOCIATED INFRASTRUCTURE (INLAND AQUACULTURE PONDS, PIPELINES, SOLAR PV PLANT, 2 MW WIND TURBINES AND BIOFUELS AND GREEN HYDROGEN PRODUCTION FACILITY)

LOCATED NORTH OF THE WLOTZKASBAKEN SETTLEMENT, ERONGO REGION

ISSUES AND RESPONSE REPORT

TABLE 1: COMMENTS RECEIVED BY IAPS ON THE BID, NEWSPAPER ADVERTS, E-MAIL NOTIFICATIONS, SITE NOTICE AND DURING INFORMATION SHARING (KEY STAKEHOLDERS) MEETING

NO.	COMMENT / QUESTIONS / ISSUE RAISED	NAME/ORGANISATION	METHOD	RESPONSE & REFERENCE IN ESIA REPORT
VISUAL/SENSE OF PLACE				
VSP1	The dwelling Wlotzkasbaken, as we all know, is unique for us for a long time and our Wlotzkasbaken small community. Wlotzkasbaken is not suitable to transform it into an Industrial area.	Friederike Deloch	Email 23.06.2025	The Seaweed Aquaculture site is selected due to the following factors: ● Proximity to the existing Orano/Erongo Desalination Plant, which is a key component in the project, for the supply of fresh water for green hydrogen production. ● Proximity to the existing substation, whereby surplus electricity generated from wave, wind and solar can be fed into the grid to supply electricity to nearby communities. ● Proximity to the Walvis Bay Port, where the biofuels and e-fuels are proposed to be transported to supply vessels with these biofuels, therefore making it financially viable to transport the fuels to the port. ● The site is situated on a significantly low elevation (20 m above sea level), which would make it suitable, viable and efficient to pump water from the sea to the aquaculture ponds, as also evident from the Erongo Desalination Water Pumping activities. ● The Seaweed (Ulva) is widely found in the area, creating an abundance supply of seaweed for harvesting and therefore contributing to the sustainability of the Project. ● This section is free of dunes (compared to the stretch between Swakopmund and Walvis Bay, which otherwise would require SKORPIoN to transverse them with the pipelines or threated to bury the project as they move.
VSP3	These structures will deface the pristine desert.	Caroline Burmann	Email 27.06.2025	The area is frequented by the Orano Desalination Plant activities and pipelines, recreational fishers and off-road driving, as such the area is not entirely pristine.

VSP4	These structures will possibly create light pollution.	Caroline Burmann	Email 27.06.2025	With reference to section 6.1.15 of the Wind ESIA report, the Wlotzkasbaken Settlement is approximately 4 km away from the site. The proposed site is located north of the Erongo Desalination Plant, which will partially obscure the view to the site. There is a low visibility of the site due to its significant distance.
VSP5	Wlotzkasbaken is one of the few remaining quiet, pristine coastal communities in Namibia. Its appeal lies in its unspoiled natural environment, star-filled night skies, and eco-tourism potential. An industrial methane facility would severely degrade the aesthetic and environmental value of the area, undermining both current tourism and long-term sustainable development opportunities.	Joachim and Magret Hambsch	Email 02.07.2025	The area is frequented by the Orano Desalination Plant activities and pipelines, recreational fishers and off-road driving, as such the area is not entirely pristine.
VSP6	Wlotzkasbaken farm is made up of the Wlotzkasbaken residential area where the houses and the townlands around it that are not yet zoned. This is a quiet little fishing village that has no electricity, services or direct water connections, where each house is self-sufficient and we all basically live off the grid. It seems to be the only area in this part of our coastline that is not yet zoned and is therefore earmarked for developments. Surrounding this farm are National Parks and therefore the concern is that the Wlotzkasbaken farm might turn into an industrial park – which might be detrimental to the receiving environment if we have regard to the potential impacts. We are of the view that a project of this nature would not be best	Bianca and Murray Lewis	Email 06.07.2025	The area earmarked for development has been zoned by the Erongo Regional Council as an industrial area for indutrial developmental purposes and SKORPIoN have been allocated the land portion by the Erongo Regional Council on that basis. An Environmetal Clearance Certificate for the subdivision of that land portion was issued to the proponent in 2024. A Wlotzkasbaken zonal map from the Erongo Regional Council is available. It should be noted that the area is largely disturbed and used by the activities of the existing Orano/Erongo desalination plant infrastructure. These area consists of pipelines and other infrastructure associated with the desalination plant. As per section 6.1.15 of the Wind Turbines ESIA, the proposed site is not visible from the residents of Wlotzkasbaken due to the 4 km settlement distance from the site.. Most of the recreational activities such as fishing is observed to be southwards of the Wlotzkasbaken settlement further away from the site where it is a pristine environment and best suited for fishing and other recreational activities. Recreational activities are not common adjacent to the site due to disturbances from the Oranp/Erongo maintenance team and activities.

	suited for this area. The visual impact and the possible noise impact of the huge wind turbines is also of great concern.			
VSP7	While the settlement of Wlotzkasbaken is located approximately 4km away from the proposed site, and may not have a blatant visual impact, any residents of the settlement who utilise the area for recreation or other activities inside of the 4km area will be impacted visually	Bianca and Murray Lewis	Email 06.07.2025	It should be noted that the area is largely disturbed and used by the activities of the existing Orano/Erongo desalination plant infrastructure. These area consists of pipelines and other infrastructure associated with the desalination plant. As per section 6.1.15 of the Wind Turbines ESIA, the proposed site is not visible from the residents of Wlotzkasbaken due to the 4 km settlement distance from the site.. Most of the recreational activities such as fishing is observed to be southwards of the Wlotzkasbaken settlement further away from the site where it is a pristine environment and best suited for fishing and other recreational activities. Recreational activities are not common adjacent to the site due to disturbances from the Oranp/Erongo maintenance team and activities.
VSP8	What remedies are being undertaken to avoid impacts from the artificial lighting on site – which will be in operation during night time hours? With no other development in the area, it would be feasible that lighting during night-time hours is likely to become an eyesore.	Bianca and Murray Lewis	Email 06.07.2025	With reference to section 6.1.15 of the Wind ESIA report, the Wlotzkasbaken Settlement is approximately 4 km away from the site. The proposed site is located north of the Erongo Desalination Plant, which will partially obscure the view to the site. There is a low visibility of the site due to its significant distance.
BIODIVERSITY AND MARINE FAUNA AND FLORA				
BM1	Wlotzkasbaken is located in the Dora National Park (dry land) the coastal strip from the Kiuseb Delta to the Ugab River. It is a nature reserve to protect our beautiful bird – and plant life.	Friederike Deloch	Email 23.06.2025	The National Park falls outside the Wlotzkasbaken Town Boundary. The proposed site falls within the the area earmarked for development has been zoned by the Erongo Regional Council as an industrial area for indutrial developmental purposes and SKORPIoN have been allocated the land portion by the Erongo Regional Council on that basis. An Environmetal Clearance Certificate for the subdivision of that land portion was issued to the proponent in 2024. A Wlotzkasbaken zonal map from the Erongo Regional Council is available.
BM2	These structures will destroy the habitats of many animals living in the desert, destroy the	Caroline Burmann	Email 27.06.2025	The ESIA process assesses the potential environmnetal impacts and develop/formulate mitigation measures to minimize these impacts to acceptable levels.

	plants and lichen.			
BM3	The surrounding area is part of a unique and fragile desert ecosystem, including highly sensitive lichen fields that take decades or even centuries to recover from disturbance. These ecosystems are not only ecologically irreplaceable but also visually distinctive and valuable to scientific research and tourism. Additionally, the region is home to 4 rare and endemic scorpion species (Opistophlamus Penrithorum, Parabuthus Namibensis, Parabuthus Gracilis, Uroplected Pillosus), some of which may not yet been fully documented, in particular Opistophlamus Penrithorum. Industrial development poses a direct threat to these species and their microhabitats. The EIA lacks a detailed ecological impact assessment or mitigation strategy addressing this biodiversity concern.	Joachim and Magret Hambsch	Email 02.07.2025	Addressed in section 8 in all the reports. No-go areas/exclusion zones have been developed. Mitigation measures on the disturbance of lichens have been developed as part of the ESIA process. A biodiversity specialist investigation was conducted which provided input into the ESIA process.
BM4	Having perused the report, and noting the various sections in which biodiversity is mentioned, we believe that the impacts on biodiversity loss have not been accurately investigated or reported on within the report	Bianca and Murray Lewis	Email 04.09.2025	Biodiversity has been assessed in detail through the services of a biodiversity specialist that provided input into the ESIA.
BM5	Many species including endemic species, such as the Pachydactylus kochi, the Stenocara eburnean, theOpstophthalmus penrithorum, the Parabuthus namibensis, the Parabuthus gracilis, and the Uroplectes pilosus, which have been found within the lichen fields and coastal environment of Wlotzkasbaken. These have not been	Bianca and Murray Lewis	Email 04.09.2025	Addressed in section 8 in all the ESIA reports. As per the assessment conducted, only specieis of Lecidella crystallina, Buellia sipmanii, and Caloplaca volkii are found within the boundary of the Project Study area and have been assessed with mitigation measures developed to minimize the impacts to acceptable levels.

	mentioned in the report and it is therefore unclear if they have been assessed, alternatively, the developments impact on them has been assessed.			
BM6	Section 6.1.11 on avifauna mentions that the site is a favourable breeding ground for species and that the construction activities would have a significant impact on the breeding birds. The impact caused on the breeding grounds has the potential to detrimentally affect number of species, reproduction rates, and territory.	Bianca and Murray Lewis	Email 04.09.2025	Addressed in section 8.2 in the Wind Turbine ESIA reports and relevant mitigation measures are identified for implementation.
BM7	With the care that is taken in the noting of species in 6.1.10 Fauna for true bugs, butterflies and moths, one questions why the reptile species are not named in the report. Further it is mentioned that over 80 species of reptiles are found within the area – yet very few of these are listed. We recommend that an accurate census be conducted over a sufficient time period and in as many seasons as possible in order to accurately reflect the species that may be affected.	Bianca and Murray Lewis	Email 04.09.2025	Reptile species found and sighted within the site are added. An on-going monitoring programme is recommended as part of the ESMP.
BM8	The report mentions several foundation species, the critical biodiversity of the area being globally recognised, the classification as an Important Bird Life Area, and notes the extreme fragility of the environments surrounding the proposed development. There has been no assessment of the impact to these foundation species and the possible	Bianca and Murray Lewis	Email 04.09.2025	Addressed in section 8 in all ESIA reports. The foundation species have been identified to exist within and along the drainage channels, these channels are zonet as no-go areas, whereby development apart from the above-ground solar panels, should not take place within these drainage channels and these channels should not be altered. The solar panels are not anticiapted to cause any alteration to the channel or causes any fauna and flora disturbance in the area, as only steel poles are mounted into the ground. The

	knock-on effect that these impacts will have on the biodiversity of the area or the sensitive ecosystems surrounding the proposed project area. Further, our clients have informed us of several species of which scientific data is negligible or low and which could potentially be studied further within this habitat.			project will procure solar panel designs suitable for erecting along a channel.
BM9	The environmental impacts of construction and operation have not suitably been addressed in respect of the: - Reptilian species; - Insect species; - Avifaunal species; - Drainage channels; - Lichen fields. Items that should have been addressed including: - Effect of vibrations, lighting and operations on the reptilian and insect species of the area; - Effect and possibility of wind strikes to local avifaunal species and numbers; - Effect of the construction and operation to the breeding bird populations settling within the drainage channels; - Effect of the development impacts associated with the construction of the wind turbines leading to the flattening and/or degrading of the hummock species habitats and environment; - Effect of vibrations and operations on lichen	Bianca and Murray Lewis	Email 04.09.2025	Addressed in section 8 of all the ESIA reports. All these aspects are included in the ESIA report with no-go areas identified and appropriate mitigation measures identified.

	species. The reports should be adjusted to include information on each of these sensitivities.			
BM10	The proposal does not successfully address the environmental impacts of the installation of the lower and upper towers of the wind turbine. The cranes used to install these fabricated components will compress soils and result in biodiversity and vegetation loss	Bianca and Murray Lewis	Email 04.09.2025	Addressed in section 8 and Table 9 of the Wind Turbines ESIA report. The mitigation measures for soils are included in Table 13 of the ESMP.
BM11	The ESIA does not effectively address the impacts on avifauna and bats, including flight corridors and migratory behaviour? Section 6.1.11 of the report states that "the site is part of a major migratory route and is crucial for roosting and feeding." There is also no data of any studies which have been undertaken to determine how the species would be impacted. Section 8.2. mentions that 'declines in breeding populations of raptor and other birds are typically observed post wind turbine construction", however the birds which are listed do not include any raptor species or note their effect on these species.	Bianca and Murray Lewis	Email 04.09.2025	Addressed in section 6 in all reports under "Avifauna". The impact assessment is conducted and highlighted under section 8.2 in Wind Turbines ESIA report.
BM12	Page 74 mentions that a monitoring programme should take place during operations to determine how to target bird species and different flight patterns. Why should this activity wait until operation? Surely	Bianca and Murray Lewis	Email 04.09.2025	Monitoring (section 5.1 of ESMP) was conducted as part of the ESIA and formed part of this ESIA report and will continue throughout the life of the project. Results of which will be regularly submitted to the Ministry of Agriculture, Fisheries, Water and Land Reform as proposed and indicated by the Ministry in the consent/recommendation letter obtained from them.

	in the case of such a biodiverse area, prevalent with avifaunal species and including a breeding ground, this type of monitoring programme should take place outside of the operations of the turbines to determine an accurate assumption of the possible impacts – this monitoring should ideally take place in each season and throughout each migration movement. What measures are put into place to stop the loss of ocean resources in the continuous sea water exchange from the ocean? Small crustaceans, jelly fish, and other micro-species may be captured in this transfer			
BM13	It is mentioned that avoidance strategies include employing radar or optical cameras to detect and analyse bird trajectories. What visual and health impacts are there in employing such technologies on surrounding species?	Bianca and Murray Lewis	Email 04.09.2025	No impacts. These are small devices deployed on the wind turbines and will not be visible from the surface from any species. These devices are designed specifically for bird detection and will not have any additional impacts.
BM14	What species of seaweed do they propose using?	Colleen Mannheimer	Email 23.06.2025	Ulva Lactuca is proposed
BM15	Are the proponents planning to do a bird study for the turbines?			Yes, as part of the biodiversity specialist investigation, a bird study/input in included.
BM16	Why is this site selected considering the sensitive lichen fields? Will you include the alternatives in the report? Is there site 2 or site 3?	Public Meeting Attendee	Public Meeting 18.06.2025	Addressed in section 5 of the ESIA Report. The Seaweed Aquaculture site is selected due to the following factors: ● Proximity to the existing Orano/Erongo Desalination Plant, which is a key component in the project, for the supply of fresh water for green hydrogen

				production. ● Proximity to the existing substation, whereby surplus electricity generated from wave, wind and solar can be fed into the grid to supply electricity to nearby communities. ● Proximity to the Walvis Bay Port, where the biofuels and e-fuels are proposed to be transported to supply vessels with these biofuels, therefore making it financially viable to transport the fuels to the port. ● The site is situated on a significantly low elevation (20 m above sea level), which would make it suitable, viable and efficient to pump water from the sea to the aquaculture ponds, as also evident from the Erongo Desalination Water Pumping activities. ● The Seaweed (Ulva) is widely found in the area, creating an abundance supply of seaweed for harvesting and therefore contributing to the sustainability of the Project. ● This section is free of dunes (compared to the stretch between Swakopmund and Walvis Bay, which otherwise would require SKORPIoN to transverse them with the pipelines or threated to bury the project as they move.
BM17	If the solar panels are installed at a height of 1-2m above the ground, how does this effect the biodiversity of the lichen and hummock species due to the limited exposure to sunlight? Additionally, how does this affect the species exposure to dew which is essential for its survival? The mounting of the solar panels on heightened structures can not be seen as reducing the development footprint, and avoiding disturbances. Impacts that may not be assessed in light of this include: - The height of the panels may allow for the natural flow of water – however, one must consider any impacts from the flow of water on the legs of the mounts	Bianca and Murray Lewis	Email 04.09.2025	Addressed and thoroughly assessed in section 8 of the Solar pv ESIA report. ● The drainage in the area is a dry non-perennial drainage system. Therefore, surface water in the area is scarce. However, should the area experience any rainfall or water, the natural flow of water will be undisturbed by the solar pv plant due to their positioning and design above the ground. ● The NATUIRE AND DESIGN of the installation does not require any removal or disruption of fauna and flora, specifically the Arthraerua leubnitziae, and Zygophyllum stapffii hummock species. ● SKORPIoN should implement regular infrastructure maintenance to prevent corrosion. ● The solar installation activities should be carefully monitored to avoid any

	- The impacts of reduced sunlight for lichen and hummock species should be assessed by population numbers. - The impacts of the panels and mounting structures within the important bird life area and breeding area for many species. Will species still breed in the presence of these structures? - Will the reduction in sunlight affect the breeding area and patterns of the avifaunal species which rely on sunlight for heat requirements during nesting? No mention is made of possible heat generation from the reflective surface of the PV panels. This may have detrimental impacts on the flora and cold-blooded faunal species in the area. The height of the panels may allow for the natural flow of water – however, one must consider any impacts from the flow of water on the legs of the mounts (assumed to be metal/ steel or similar) and possible oxidation and rusting that may occur thereby leading to contamination and pollution. One must also therefore consider the impacts of maintaining the structures in the drainage areas. How often will these be replaced thereby creating further impacts and disturbance.			removal or disturbance of fauna and flora.
BM18	Section 8.2. mentions “monitor accumulation of marine fauna on hard substratum including invertebrates”, however, no information is given on how this mitigates the severity from a 12 to an 8. Additionally, no information is provided should the monitoring exhibit negative impacts in the environment.	Bianca and Murray Lewis	Email 04.09.2025	Addressed in section 8.2 of the Pipeline ESIA report as follows: ● Since this may not be avoided or prevented, SKORPIoN should implement a monitoring program to assess disturbance of cetacean movements. ● Monitor accumulation of marine fauna on hard substratum including invertebrates and ascertain a specialist marine investigation should the

				accumulation of marine fauna on hard substratum be severe.
BM19	The mitigation measure provided only refers to mitigation in the installation phase of the project. What mitigations are to be put in place to avoid issues during the operation of the pipeline, when most impacts may be felt over a lengthier duration.	Bianca and Murray Lewis	Email 04.09.2025	Addressed in section 8.3 of the pipleine ESIA as follows: SKORPIoN ought to engage and liaise with the Ministry of Agriculture, Fisheries, Water and Land Reform (MAFWLR)prior to the commencement of installation activities to ensure that these undertakings do not coincide with critical periods during the spawning season. In addition, MAFWLR should also be consulted during operations to ensure that pipeline maintenance and other pipeline related activities do not coincide with critical periods during the spawning season.
TRAFFIC				
T1	The proposal does not mention any traffic impacts of the transportation of the fabricated components of the wind turbines. Further, no environmental impacts are mentioned – what would occur if the transportation truck breaks down within the coastal environment causing further environmental and biodiversity loss? Has the requirement for additional access roads been looked at in depth?	Bianca and Murray Lewis	Email 04.09.2025	Traffic impacts and management mitigation measures are assessed in Table 12 of the ESMP report, which includes: ● Signage must be implemented to warn motorists of construction activities. ● Ensure that an Emergency Response Plan is in place, in event of an accident. ● The Contractor shall prepare a strategy to ensure the disruption to traffic is minimized to acceptable levels. ● The strategy should include a schedule of work including when and how road crossings (construction at existing intersections) will be made. ● The Contractor shall also liaise with the Traffic Authorities for their approval in this regard. Proper traffic and safety warning signs must be placed at the construction site to the satisfaction of the Engineer and the Roads Authority.
Waste Management				
WM1	It is not clear to me from the BID whether any effluent will be produced, what it might be, where and how it will be vented and whether any negative effects, marine or otherwise, might be anticipated, either from a pilot or from a full-blown facility. Depending on what	Colleen Mannheimer	Email 23.06.2025	This referes to mobile toilets during construction. The rehabilitation process for these is outlined in the ESMP which includes: ● All construction sites should be photographed (1) before commencement, (2) after completion and (3) after rehabilitation of the activities.

	effluent effects might be, would any baseline studies on submarine substrates, such as rocks and their flora and fauna be done prior to production beginning?			• All bunding areas, equipment, waste, ablution, temporary structures, stockpiles must be removed and areas to be rehabilitated. • All disturbed areas shall be reshaped to theoretical contours; as close as possible to the natural conditions before construction commenced, including, detours, and temporary access routes. • All cuttings must be shaped with a slope to provide a natural appearance, without having to destroy significant vegetation on top of the slope.
WM2	The proposal mentions that skips will be used on site for waste management during construction. How will the skips be protected to avoid waste being blown away by winds? Further, these skips are to be emptied on a regular basis - What classifies as a regular basis? In such a biodiverse area how does one avoid small reptiles and insects from entering waste streams and thus being 'dumped'	Bianca and Murray Lewis	Email 04.09.2025	Addressed in the ESMP under table 11 as follows: • Ensure suitable receptacles with lids for waste disposal is available on site at all times. • If rubbish containers are used, ensure these can be sealed from strong wind "On a regular basis" depends on the volume of waste that will be generated.
Noise Management				
NM1	These structures will create noise pollution.	Caroline Burmann	Email 27.06.2025	The noise management and control measures have been assessed as part of the ESIA. Please refer to Table 15 of the ESMP Report and section 8.3 of the ESIA Wind Report. Residential reports from within 1km of Wind Parks complain of stress and anxiety created by the noise. Given that the proposed turbines are 4km from the nearest settlement, the impact on humans is not an issue.
NM2	We are concerned with the Noise that will come from the Wind turbines.	Public Meeting attendee	Public Meeting 18.06.2025	
NM3	On a normal day, would you say we would be hearing the noise of the turbines from the settlement?	Public Meeting attendee	Public Meeting 18.06.2025	

AQ1	These structures will create noise pollution.	Caroline Burmann	Email 27.06.2025	
Health and Safety				
HS1	Our security will be jeorpadized	Caroline Burmann	Email 27.06.2025	The proposed project is located 4km away from the Wlotzkasbaken community and as per the assessment, the activities will not be visible from the settlement. The site will be fenced off and security guards will be permanent on site. Workers will commute daily from Henties and Walvis Bay. No worker will be living onr housed on site.
HS2	The gas itself as well as the VOCs pose human health risks such as worsening respiratory conditions (e.g. Asthma, eye, nose and throat irritation, headaches and nausea, bronchitis, cardiovascular disease and possible lung cancer and premature death).	Joachim and Magret Hambsch	Email 02.07.2025	The effluent discharged from the electrolysis will be O2, which will be released into the atmosphere and has no impact on the environment.
HS3	Methane forms explosive mixtures with air - what are the risks involved for the township, now and in the future.	Colleen Mannheimer	Email 23.06.2025	The methane will be stored in tanks on site and not exposed to the environment. However, as part of health and safety, risk assessments and contigency action plans are recommended to ensure quick and fast response to any accidents or spillages.
HS4	Will the workforce be living on site with their families?	Public Meeting attendee	Public Meeting 18.06.2025	Addressed in Table 16 of the ESMP Report. The project will recruit mainly locals, meaning for the people already living either in Henties Bay or Swakopmund and definitely not setting up a village or anything like that on site.
HS5	Will the development area be fenced at all? If so, what type of fencing is to be used? Will the fence be electrified? What is the impact of the fence on migratory birds? What would the	Bianca and Murray Lewis	Email 04.09.2025	Wire fencing will be used and will not be electrified. As with the solar panels, it is recommended as part of the ESMP that monitoring of bird and other species mortality should be conducted on a daily basis and appropriate measures such as redesigning

	impact be on the smaller species who may be caught on the electric wire? What measures would be taken if an animal were to betrapped within the development area?			should be developed to ensure that fauna mortalities are kept as low as possible.
Other				
O1	Methane is extremely flammable and poses a high risk of explosion or fire. The proposed site's remoteness and limited emergency infrastructure would severely hinder effective response in the event of an incident. The safety protocols outlined in the EIA are vague and not tailored to this specific risk profile.	Friederike Deloch	Email 23.06.2025	Due to the remoteness and 4km distance from the site, no 3rd party health and safety impacts are anticipated on the Wlotzkasbaken community. However, SKORPIoN to ensure that the the OSHA health and safety protocols are implemented.
O2	There is concern that this facility is being positioned as a pilot project. The undertaking by the proponent that this project will remain a pilot project is improbable and unconvincing as the purpose of a pilot project is to establish feasibility of the project at that exact location. This raises a red flag, as the cumulative and long-term impacts of such an expansion have not been disclosed or assessed in the current EIA. It would be disingenuous and non-compliant with transparent environmental governance to approve this project without examining its full future trajectory. Given the above, I respectfully request the following: - Immediate suspension of the EIA process until an independent ecological assessment of the lichen fields and scorpion populations is completed; - A strategic environmental assessment (SEA) addressing future expansion scenarios and	Joachim and Magret Hambsch	Email 02.07.2025	Projects of this nature are normally done in phases. The first phase being a pilot and the 2nd phase is expansion to commercial operations. A separate EIA will be conducted to assess the expansion and phase 2 of the project. This ESIA only assesses the pilot phase.

	cumulative impacts; - A serious review of alternative, less ecologically sensitive sites.			
O3	Where is water to be obtained for construction purposes? What are the projected fresh water requirements during construction?	Colleen Mannheimer	Email 23.06.2025	Water will be stores in water storage tanks during construction and will be obtained from the nearby towns of Henties Bay and Swakopmund.
O4	Could you tell me what the "off taker" is please?			The power generated from solar and Wind will be used for the operations of the aquaculture project and supply the ponds and production facilities with power for biofuel production.
O5	Could you give me some indication of where staff will be housed during construction and then during production?			Staff will be housed in nearby towns of Henties Bay and Swakopmund and commute each day to the site and no worker will be living on site.
O6	In the event of this project not succeeding, how would the proponent propose funding and undertaking remediation, including removal of all structures, linear and other?			A rehabilitation plan is proposed as part of the ESMP to ensure appropriate rehabilitation after the project ceases.
O7	What is the time-frame?	Public Meeting attendee	Public Meeting 18.06.2025	We are targeting construction in 2026 and commissioning in 2027. However, pending the EIA process and funding.
Q8	Have you done a financial feasibility report?	Public Meeting attendee	Public Meeting 18.06.2025	This ESIA is required to unlock the funds to commence with the feasibility.
Q9	When do you expect the financial feasibility to be available and will it also be available?	Public Meeting attendee	Public Meeting 18.06.2025	The financial feasibility will be conducted prior commencement of the activities.
Q10	Do you already have an energy generation license?	Public Meeting attendee	Public Meeting	The ESIA is required prior to applying for an energy generation license or as part of

			18.06.2025	the energy generation license requirements.
Q11	How is the seaweed harvested and where do you get it from?	Public Meeting attendee	Public Meeting 18.06.2025	Addressed in detail in section 4 of the Ponds ESIA Report.
Q12	Can you give us a description of each of the components or process flow diagrams and specifications of the turbines?	Public Meeting attendee	Public Meeting 18.06.2025	The wind panels will be arranged in a fixed-tilt configuration. The turbines are made up of the following components - Blades, Lower Tower, Upper Tower, Nacelle and Concrete Foundation and support structures for the wind turbines, ensuring stability and durability. A lithium-ion battery system with a capacity of 10 MWh will be used for peak shaving and energy arbitrage and connected to the green hydrogen and biofuels facility. Electrical cables will be connected to this system from the wind turbines via the power management system.
Q13	Can you elaborate on the Steel Jetty?	Public Meeting attendee	Public Meeting 18.06.2025	Addressed in detail in Section 4.3 of the Pipeline ESIA report.
Q14	Can I suggest a fund to rehabilitate the facility in the end? What sort of rehabilitation will be done?	Public Meeting attendee	Public Meeting 18.06.2025	Rehabilitation included in the ESMP.
Q15	The report mentions that management and mitigation measures are stipulated in the ESMP – however, the ESMP document was not provided for review. Therefore, no comment can be given on whether the provisions of the ESMP are suitable for the mitigation and management of impacts.	Bianca and Murray Lewis	Email 04.09.2025	The ESMP is available for review and public commenting
Q16	The ESIA document does not contain any specialist reports from independent outside specialists. However, it is noted that a biodiversity specialist was included. May we be provided with the reports undertaken by the specialist?	Bianca and Murray Lewis	Email 04.09.2025	Biodiversity Report is available and can be shared with the public.

Q17	Solar PV panels are known to have a limited lifespan. What is the procedure for maintenance and decommissioning when panels reach their lifetime? There will surely be environmental impacts stemming from the removal and disposal of these panels. Further, if new panels are installed, there will be further environmental impacts and disturbance relating to this activity. It is a lapse in reporting as this information is not included in the documents and one must assume that this has not been taken into consideration.	Bianca and Murray Lewis	Email 04.09.2025	Addressed in the ESMP under Table 11 and 20 as follows: • Pollution will be prevented through basic infrastructure design and through maintenance of equipment. • All construction sites should be photographed (1) before commencement, (2) after completion and (3) after rehabilitation of the activities. • All bunding areas, equipment, waste, ablution, temporary structures, stockpiles must be removed and areas to be rehabilitated. • All disturbed areas shall be reshaped to theoretical contours; as close as possible to the natural conditions before construction commenced, including, detours, and temporary access routes. • All cuttings must be shaped with a slope to provide a natural appearance, without having to destroy significant vegetation on top of the slope. • Existing borrow pits need also be rehabilitated during rehabilitation phase.
Q18	What is the maintenance protocol for wiring? If there are issues with power supply to the panels requiring the re-excavation of these wires will this have further impact on the surroundings? Is topsoil management going to be in place during the excavation of these trenches?	Bianca and Murray Lewis	Email 04.09.2025	The topsoil will be backfilled. The rehabilitation process outline in the ESMP will take effect as follows: • All construction sites should be photographed (1) before commencement, (2) after completion and (3) after rehabilitation of the activities. • All bunding areas, equipment, waste, ablution, temporary structures, stockpiles must be removed and areas to be rehabilitated. • All disturbed areas shall be reshaped to theoretical contours; as close as possible to the natural conditions before construction commenced, including, detours, and temporary access routes.

				• All cuttings must be shaped with a slope to provide a natural appearance, without having to destroy significant vegetation on top of the slope. Existing borrow pits need also be rehabilitated during rehabilitation phase.
Q19	Comments 1.10 – 1.12 of Report number 1 remain relevant in respect of bird mortality, however, in this case with respect to the reflective surface of the PV Panels. In addition, the monitoring, management and mitigation measures states 'evaluate the effectiveness and validity of applying anti-reflective coatings to solar panels', the use of the word evaluate does not determine that this will be undertaken as a mitigation measure and therefore unless there is commitment to the measure cannot be used to offset the severity of the impact.	Bianca and Murray Lewis	Email 04.09.2025	It should always be noted that the development of mitigation measures is an attempt to minimize potential impacts and should these mitigation measures be found not to be effective during their implementation, then the use of the word "evaluate" means further assessment and further action should be explored and undertaken to minimize the impact.
Q20	No information has been provided on the transportation of methanol, E-methanol, or Oxygen to their relevant locations or how often this transportation will take place. It is therefore yet to be determined if this transportation will have an affect on traffic and on the surrounding environment.	Bianca and Murray Lewis	Email 04.09.2025	The transportation impacts will be undertaken through a separate ESIA process that will be initiated in the near future.
Q21	No information has been provided on how the digestate will be transported around the aquafarm and recirculated into the system.	Bianca and Murray Lewis	Email 04.09.2025	Addressed in section 4.3.3 and section 8 in the production facility ESIA report.
Q22	The relevant management and mitigation measures do not sufficiently say which steps will be taken to address the possibility of a exposure to the natural environment. For example: "properly designed discharge systems can help to dilute digestate and minimize its impact." However, no further	Bianca and Murray Lewis	Email 04.09.2025	Further management and mitigation measures are included in the ESMP under waste management.

	information or design detail is provided to show how this is to be implemented on site.			
Q23	Page 45 of the report mentions that "A preliminary design for the bulk supply pipeline has been established," however, no example designs or specifications have been provided for interested and affected parties to comment on.	Bianca and Murray Lewis	Email 04.09.2025	Addressed in section 4 of the Pipeline ESIA report.
Q25	Page 46 pf the report mentions that dehydration of excess seaweed will occur in the summer months, no details have been provided on the dehydration process or the storage of excess seaweed once dehydrated.	Bianca and Murray Lewis	Email 04.09.2025	Addressed in section 4.6 of the Ponds ESIA report.
Q26	No information is provided on the materials to be used for the pipeline or for its marine stability in place on the sea bed.	Bianca and Murray Lewis	Email 04.09.2025	Addressed in section 4 of the Pipeline ESIA report
Q27	We note that the frequency/ severity risk matrix that is used to assess impacts does not provide any feedback on how the mitigation measures reduce the level of risk / severity of the impact and numbers are simply provided. This is especially problematic due to the wording that is used in the impact assessments which does not commit to these mitigation measures but rather states that the need for them would be 'evaluated'. We would appreciate if some clarity may be provided on how the determination of these risk mitigation strategies was calculated.	Bianca and Murray Lewis	Email 04.09.2025	Addressed in section 8 of all the ESIA reports.

Q28	The ESIA reports do not make any mention to the independent oversight of construction activities through the appointment of an environmental control officer to undertake monitoring visits during construction or operation of the development. Further, it is not mentioned whether auditing will be undertaken on set time basis to ensure that the development is environmentally sound and reducing the possible impacts that could have been possible. We would appreciate feedback on whether an environmental officer will be instructed and on what routine basis their visits will be conducted?	Bianca and Murray Lewis	Email 04.09.2025	Addressed in sections 4 and 5 of the ESMP report
Q29	Is the fact that each aspect of the facility has a separate ESIA report a sign that if it were combined that the larger impact of the development would be shown?	Bianca and Murray Lewis	Email 04.09.2025	Each activity is a listed activity as per the EIA regulations, that trigger the need for its own ESIA process, hence they have been assessed separately.
Q30	In light of the above, we object to the development as we believe that the ESIA reports do not sufficiently address the environmental impacts of the development, nor do they correctly assess the impacts through mitigation measures. Our further objection is based on the fact that a full review could not be undertaken as the ESMP document(s) have not been provided and we are unable to assess the measures suggested to reduce the environmental impact of the development.	Bianca and Murray Lewis	Email 04.09.2025	Comments from the public participation and review of ESIA reports have been addressed in the relevant ESIA reports. The ESMP is made available for public review. The ESIA and ESMP documents are further available for a mandatory public review period upon submission to MEFT and can be reached via MEFT for further commenting.

Q31	With respect to the timeframe provided to peruse and comment on the specialist reports for the above-mentioned project. The 14-days provided for the interrogation of these reports should be deemed as an unreasonable period due to the voluminous amounts of information contained in the report.	Bianca and Murray Lewis	Email 04.09.2025	The ESIA documents are made available by I.N.K Enviro Consultants for a 14 day review period. The ESIA reports are further available for a mandatory public review period upon submission to MEFT and can be reached via MEFT for further commenting.