


Project Name:	<p align="center">BACKGROUND INFORMATION DOCUMENT TO CONSTRUCT AND OPERATE A DESALINATION PLANT ON THE REMAINDER OF ERF 4585, WALVIS BAY, ERONGO REGION</p>
The Proponent:	<p align="center">Merlus Properties (Pty) Ltd P.O. Box 3824 Walvis Bay</p>
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THE FOLLOWING IS A BACKGROUND INFORMATION DOCUMENT FOR THE ENVIRONMENTAL IMPACT ASSESSMENT AND ENVIRONMENTAL MANAGEMENT PLAN TO OBTAIN AN ENVIRONMENTAL CLEARANCE TO CONSTRUCT AND OPERATE A DESALINATION PLANT ON THE REMAINDER OF ERF 4585, WALVIS BAY, ERONGO REGION

1. Introduction

Green Earth Environmental Consultants have been appointed by Merlus Properties (Pty) Ltd to attend to and complete an Environmental Impact Assessment (EIA) and Environmental Management Plan (EMP) in order to obtain an Environmental Clearance Certificate to construct and operate a seawater desalination plant on the Remainder of Erf 4585, Walvis Bay, Erongo Region as per the requirements of the Environmental Management Act (No. 7 of 2007) and the Environmental Impact Assessment Regulations (GN 30 in GG 4878 of 6 February 2012).

The Background Information Document (BID) serves to convey information regarding the proposed project to Interested and Affected Parties (I&APs) to allow them the opportunity to comment on the proposed project.

This document contains the following information:

- A brief background on the proposed project.
- The approach to the environmental assessment process.
- Environmental and planning issues identified.
- How to become involved.

2. Background Information on Project

2.1 The Proponent

The Merlus Group operates various seafood processing facilities including the Merlus, Abroma, Cormorant and Seagull companies situated in Walvis Bay with factories located next to each other.

2.2. Project location and site description

It is intended to use the Remainder of Erf 4585, No. 86 Ben Amadhila Avenue, Walvis Bay for the construction and operation of a desalination plant. The Erf is located close to the other factories of the Merlus Group and large enough to accommodate the proposed facility.

The Group currently use around 15 000 m³ of fresh water per month and consumption is expected to increase in the new future. The operations of the Proponent recently experience interruptions of the supply of potable water due to municipal infrastructure failures (pipe bursts and breakages) as well as interruptions in bulk water supply by NamWater to the Municipality.

Erf Re/4585 is located on the shore, with own jetties protruding into the ocean which means that raw seawater can be extracted from the sea for treatment to potable water quality using desalination by reverse osmosis (RO) treatment.

See below the Locality Plans for the Project Site:

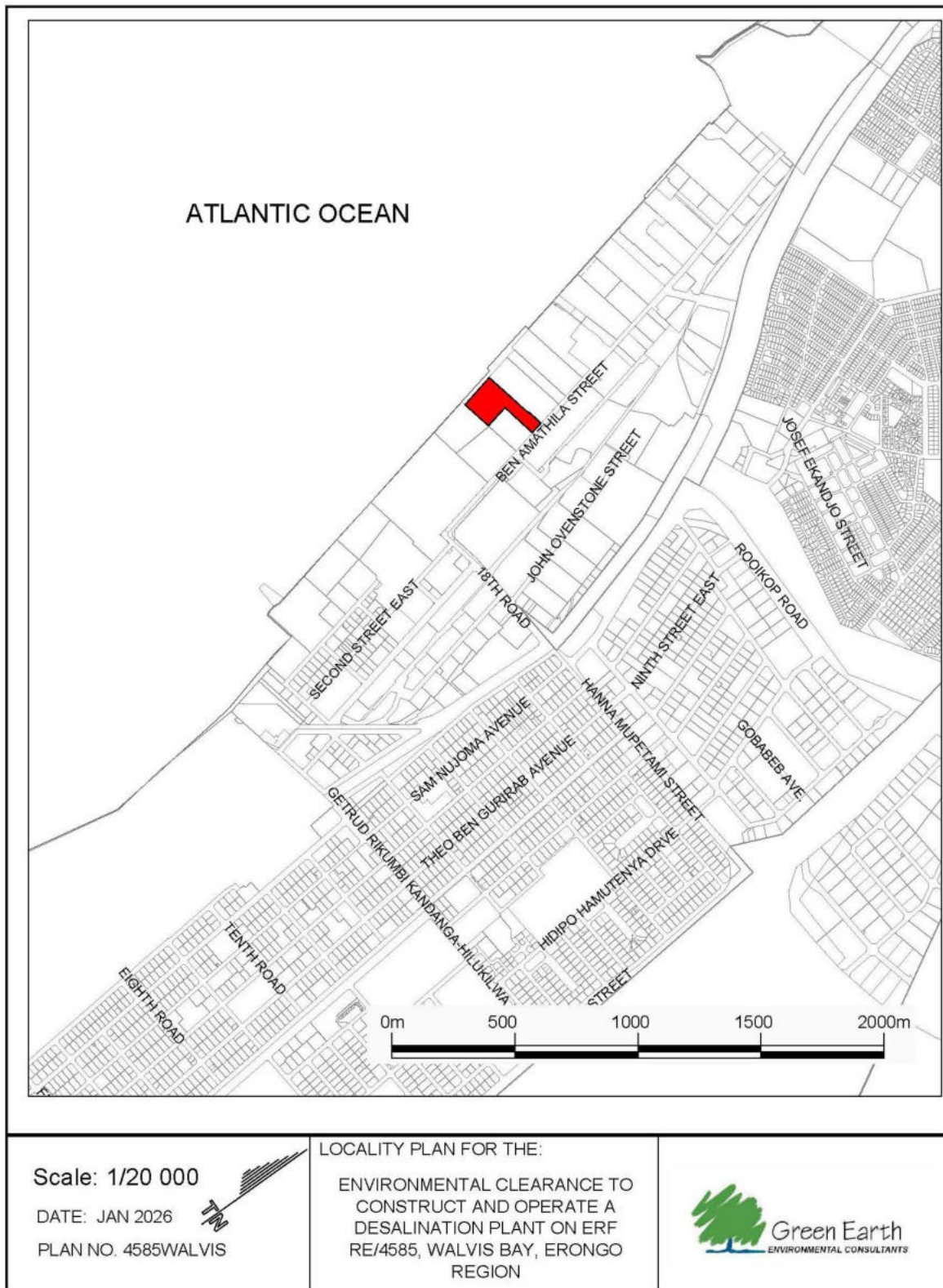


Figure 1: Locality of Erf Re/4585, Walvis Bay

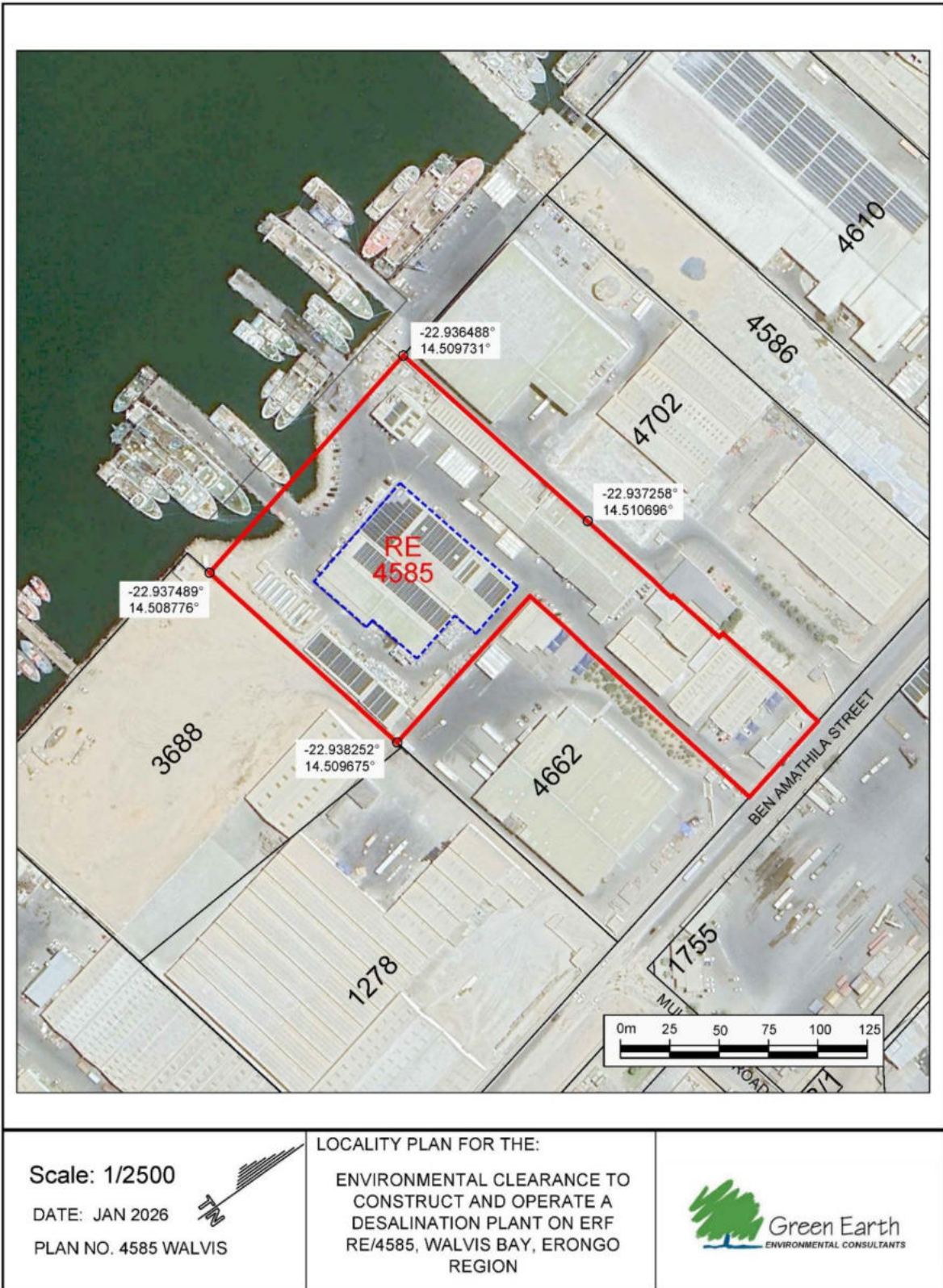


Figure 2: Site Layout Plan of Erf Re/4585, Walvis Bay

2.3. Process description

The proposed facility will produce $\pm 400 \text{ m}^3/\text{day}$ of permeate (final water) for 26 days per month, which will contribute $\pm 10\,400 \text{ m}^3$ per month of potable water for the Merlus Group's activities. The plant will be positioned in an existing warehouse on the site, and the seawater will be abstracted from a point at one of the available jetties. The wastewater (brine) produced during the desalination as well as the backwash water for the cleaning of the system will be released back into the ocean.

The Proponent appointed Aquarius Consult CC as Engineers and Project Managers for the design and management of the construction of the plant.

See below a simple process flow schematic showing the water treatment process to be implemented for the proposed Merlus desalination plant:

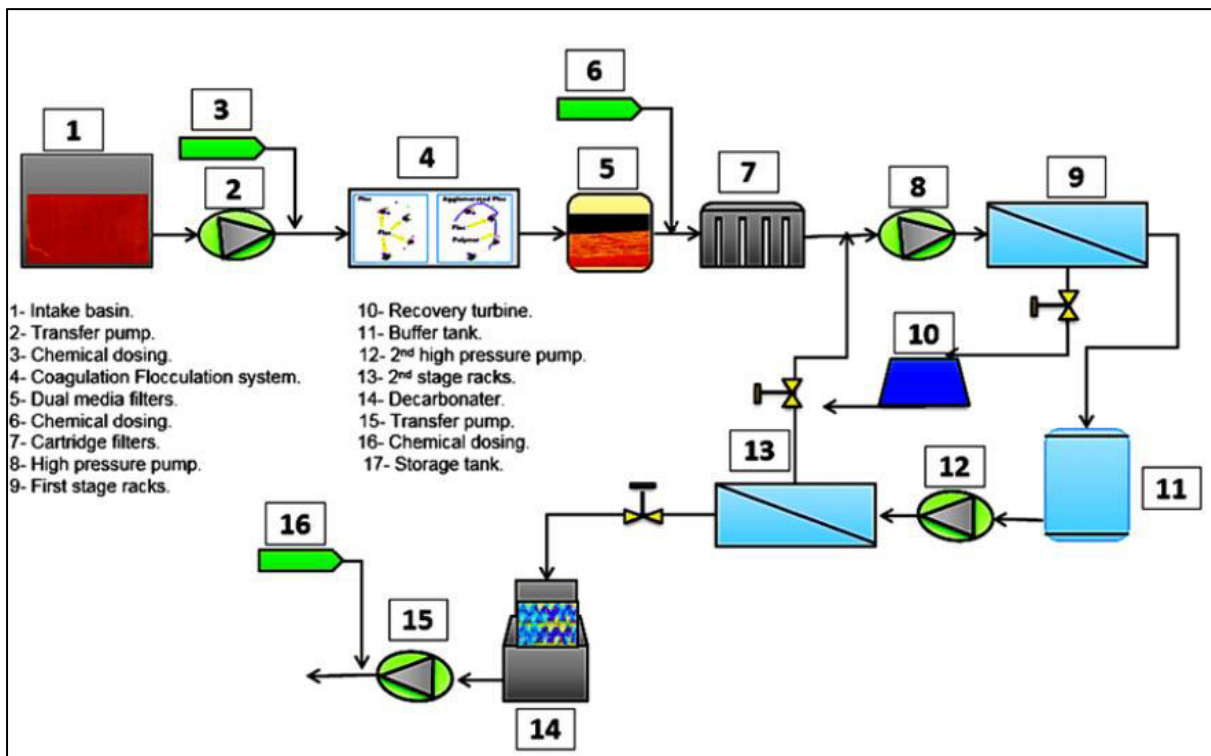


Figure 3: Process flow schematic

The processes are discussed in more detail below from information received from Aquarius Consult CC:

2.3.1. Raw Water Extraction

Seawater abstraction will consist of a set of two pumps, that will be provided on a concrete slab with roof/shield/pumproom close to the existing shed that will accommodate the treatment plant. A perforated pipe with screen and strainer at the inlet side will be provided on the suction side of the pipe protruding into the sea. These pumps will then extract raw seawater for the treatment plant, which will be on shore inside the storage shed close to the shoreline. The

design also includes a disinfection station for periodic shock dosing of the abstraction pipework from the pump station to the plant building to remove biological growth such as algae, barnacles and mussels within the pipe.

2.3.2. Pre-treatment

The raw seawater needs to be properly pre-treated especially to also cater for extensive periods of red tide and sulphur outbursts that do occur from time to time. Although red tide and sulphur outbreaks can be absent for extensive periods of time, they are recurrent. Failure to install the necessary pre-treatment to deal with these periodic outbreaks will lead to cartridge blockages and, most importantly, membrane fouling resulting in shutdowns and unnecessary high replacement costs for bag and cartridge filters and membrane replacements. Pre-treatment will include chemical dosing, flocculation, dissolved air flotation with filtration (DAFF) in the same vessel, before the filtrate is stored in an intermediate, 28m³ concrete sump housed below floor level.

Whereas the proposed process allows for very low concentrations of floating oil to be removed, it should be noted that membranes are extremely susceptible to fouling from petroleum products. Therefore, the sea water extraction point will be well below the surface (± 2 m) and no oil/fuel spills should be allowed in the area where seawater is extracted, which is also a strict requirement by the Harbour Authority.

The design and treatment process have provided for chemical addition of ferric chloride and a polyelectrolyte: two dosing stations with one dosing pump for each chemical will be supplied. It is envisaged that only small quantities of ferric chloride addition (typically 8 to 15 mg/l) will be required for most of the time, with polyelectrolyte additionally required only during exceptional conditions. After chemical addition, the raw water will be split into three streams, and a flocculation column will be provided in each stream to agglomerate small dirt particles into larger flocs before being fed to three off Dissolved Air Flotation-Filtration (DAFF) tanks that operate in downflow mode.

2.3.3. DAFF Tank

The DAFF tank combines flotation and filtration into one combined unit. Three off PE DAFF tanks, each with diameter of 2.2 m and 3.0 m high and constructed from PE (heavy wall – based on the design of a typical 10 000 l plastic water tank). Each DAFF tank can treat up to 15 m³/h of raw water. Flocculated water enters the DAFF tank in the centre, at the bottom, where it is mixed with a recycle stream containing dissolved air, which is released as micro-bubbles. To generate latter, we have based the design on the use of a Microbubble pump (duty/standby will be provided), which is a saturator pump that generates micro bubbles by sucking and dissolving air into a recycle stream via a venturi nozzle. Thus, vortex pump characteristics are used to effectively mix air into the seawater, dissolve the air and then force-feed it into the DAFF tank. The design includes two pumps (duty/standby) that can deliver up to 4.5 m³/h of saturated water (for three DAFFs combined), thus effectively replacing a conventional saturator, including the compressor and recirculation pump, static mixer and ejector as previously used in conventional DAF systems. This simplifies and reduces the mechanical equipment substantially and therefore will ensure more reliable operation and less

maintenance.

The flocs are then floated to the surface of the DAFF tank, where they accumulate as scum. Clear water flows from the top to the bottom of the DAFF tank, through a 1 000 mm thick layer of filter sand (0.80 mm ES; UC ≤ 1.4), ensuring that fine particles are filtered out. At the bottom of the tank, the filtered water is collected by a pipe lateral system with filter nozzles and discharged into the intermediate/wet sump. The DAFF tank outlet pipe for filtered water will be fitted with an electrically actuated valve. Latter closes periodically (time and duration adjustable through a timer) to allow the DAFF tank to fill up and let the scum overflow into the backwash/scum waste pipe. During normal operation/filtration, the water level just covers the sand when the filter is clean but then rises as it becomes clogged to give more driving head for filtration. When the level has risen to just below the backwash outlet collection pipe, the filter is clogged and needs backwashing. This is automatically initiated (via level sensor in the DAFF tank). For backwashing, the filtered water outlet valve is closed and the backwash inlet valve opened. The backwash pump then uses filtered water from the intermediate sump to backwash the filter sand in the DAFF tank in reverse-flow mode. Again, the duration for backwashing is timer controlled and can be adjusted to ensure proper cleaning of the filter sand. Backwash water is returned to the sea.

2.3.4. RO treatment and final water storage

From the intermediate sump 2 (off duty/standby) intermediate pumps will be provided to feed several sets of micron filters: Two off bag filters, followed by two off 10 µm and two off 5 µm cartridge filters. These micron filters constitute the final filtration steps that ensure no fines are transferred to the membranes. An anti-scalant will be added to ensure that the water fed to the membranes is not scaling. For this, a dosing station with one dosing pump will be provided. The high-pressure pump will then increase the pressure of the feed water to the Reverse Osmosis (RO) membrane skid. The arrangement of the pressure vessels for the internally staged RO plant is as follow:

- Total number of Membranes required = 24 off
- Total number of pressure vessels = 6 off (4 membranes per vessel)

To ensure the final water quality is maintained, an in-line conductivity meter will be provided and will sound a high alarm with light indication (red) when the water goes out of spec. If this light comes on, final water conductivity is too high and an indication that a membrane or seal (o-ring) has been damaged and needs replacement. Although proper pre-treatment and dosing stations have been allowed for in the design to ensure the longest possible membrane runs, membranes still need to be chemically cleaned once every 3-4 weeks. To perform the chemical clean (also referred to as Clean-In-Place - CIP), the necessary equipment for this station is included in the design. Also, an automatic flushing facility is provided to allow membrane to be left standing with permeate in, when the plant switches off. Permeate (= final water) from the RO membranes will be discharged into 4 off 10 000 L PE final water storage tanks (TK10 A/B/C/D). Final water to the factory will require disinfection, which will be done as per the client's preference (UV/Chlorine dioxide/Chlorine).

2.3.5. Energy Recovery

Providing an energy recovery unit (ERU), which uses/recovers about 50% of energy released from the high pressure from the brine leaving the RO membranes to pressurize the RO feed of the system, would reduce energy consumption and thus would constitute good environmental practice. An ERU system is expensive and not economically viable for small seawater desalination capacities, but at 400 m³ permeate production will make economic sense and will thus be provided. An ERU reduces power consumption of the RO skid (only) by roughly 50% with overall power consumption of the plant reduced by ± 40%.

Additionally, the final water from the RO should be used for condenser make-up water, as it will allow a decrease in the make-up water requirements, due to increased “cycle-up” potential.

2.4. Possible negative environmental impacts

Desalination of seawater is a valuable solution for the supplementation of water from other sources, but its environmental costs can be significant if not mitigated. The challenge lies in balancing freshwater needs with ecological protection. Innovations like renewable-powered desalination, brine management technologies, and eco-friendly intake systems are being explored to reduce these impacts.

The key negative environmental impacts of seawater desalination include brine discharge harming marine ecosystems, high energy consumption contributing to greenhouse gas emissions, and chemical pollution from treatment processes.

Brine Discharge into the ocean

- **Highly concentrated saltwater** (brine) will be released back into the ocean.

The impact will be low as:

- The brine quantities are minimal that will be released back to the sea (23 m³/h) which will be very quickly diluted by the seawater into which it is released.
- The brine does NOT constitute additional salts added and discharged to the sea – since these salts were originally in the seawater when extracted to feed the reverse osmosis (RO) plant, there is no additional burden placed on the environment by releasing the brine back into the sea.
- This brine often contains **chemicals** (anti-scalants, chlorine, heavy metals) used during desalination.

This impact will be low as the brine to be released from this plant will have the following characteristics:

- The additional chemicals used in the process are in small quantities and concentrations. The main chemical added is ferric chloride, and that will be at ± 5 to 20 mg/l range, which is very little compared to seawater salinity, which

is around 35 000 mg/l. Also, all chemicals added are certified for use in the food industry and thus not detrimental to human and/or aquatic life. They will not affect the seawater concentrations of the specific chemical species that are added and will already be diluted by the brine in which they will be released to the sea. Chemicals utilizing heavy metals will be avoided and where possible easily biodegradable chemicals will be used.

- It can **increase salinity and reduce oxygen levels**, harming marine organisms and disrupting ecosystems.

This impact will be low as:

- The brine released to the sea will not increase the surrounding seawater salinity as the quantities are very quickly diluted by the seawater. Also, high and low tide will ensure that no stagnant zones will occur, thus brine will not be contained in a specific zone but will be intermixed and exchanged with fresh seawater continuously. Discharge of brine will be in the shallow zone between high and low tide, and the wave action will ensure sufficient oxygen is introduced to the discharge.

Marine Ecosystem Damage

- Intake pipes can **trap and kill plankton, fish larvae, and other small organisms**.

This will be mitigated as follows:

- A basket screen will be installed on the abstraction line, to ensure that no small organisms can become entrapped in the process. The screen will be manually cleaned (brushed off) from time to time to keep it free from clams, algae and small organisms.
- Altered salinity and temperature near discharge zones can **stress or kill sensitive species**.
 - Temperature will remain the same as the seawater throughout the process. Salinity will not be majorly affected as the brine will be diluted by the seawater rapidly due to the small quantities thereof.
- Long-term effects may include **loss of biodiversity** and changes in food chains.
 - It is doubtful that a loss in biodiversity will occur as the quantities of brine are small and the brine is discharged in the harbour area, which is already affected by other pollutants in the area. Also, fresh seawater exchanged during high and low tides will ensure that there is now localized change in the external environment that can lead to a loss in biodiversity.

High Energy Demand

- Desalination is **energy-intensive**, especially reverse osmosis plants.
 - The proposed process incorporates an energy recovery unit, which allows for an energy saving of roughly 50%. The total, continuous power consumption of the envisaged RO plant with energy recovery unit will only be 65 kWh.
- Heavy reliance on non-renewable energy leads to **greenhouse gas emissions**, worsening climate change.
 - Merlus already makes use of solar power, which reduces some greenhouse gas emissions. Furthermore, the inclusion of the energy recovery devices also allows for a reduction in greenhouse gas emission due to lower energy requirements of the process.
- In applications with limited renewable energy, desalination can significantly **increase carbon footprints**.
 - This was specifically considered when designing this RO Plant by incorporating latest technology with low-energy membranes and incorporating an energy recovery unit (as explained above).

Chemical Pollution

- Chemicals used for cleaning and preventing fouling (e.g., chlorine, coagulants) can **leak into the environment**.
 - All chemicals are safely stored in chemical tanks, which are similarly stored in chemical bunds. The bunds will ensure that all chemical leakages are contained and can be discarded of in the correct fashion.
- These substances may be **toxic to marine life** and contribute to **water pollution**.
 - All chemicals used are certified safe for use in the food industry at concentrations safe for human consumption and thus also non-toxic to marine life. Chemicals that are harmful to marine life will not be used.

Plant Operation requires qualified personnel with relevant experience

- The plant will be operated by Merlus Group of Companies. They will look at hiring qualified operators, which have received the NamWater Water and Wastewater treatment plant operator training. Furthermore, plant operational supervision will be provided by external consultants (such as Aquarius Consult CC). This should address the Water Act's plant personnel requirement. The operations of the plant will be subject to obtaining of the required permits and licences as prescribed by the Water Resources Management Act (No 11 of 2013) and Water Resources Management Regulations (WRMA).

2.5. Possible positive environmental impacts

The positive environmental impacts of desalinating seawater for use in the Proponent's operations are as follows:

- It will reduce pressure on freshwater resources in Walvis Bay.
- It will support sustainable fish processing operations. As the Proponent will be partly self-sufficient regarding potable water supply, it will ensure that crucial production operations can carry on even when the Municipality cannot supply water. A one-to-two-day supply interruption from the municipal water network should then not affect the Group's operations/production at all.
- It will reduce the cost of water used in the operations. Municipal water costs can be expected to increase which will probably be more than the increase in costs of the desalinated water.
- It will enable water reuse pathways inside the plant - desalinated water is easier to recycle within the processing facility for secondary cleaning, cooling water, or non-potable applications. This reduces total water consumption and minimizes wastewater volumes.
- It will decrease ecological pressure on surface water ecosystems.
- The proponent will integrate the desalination activity with renewable energy sources (the onsite solar installation) which will reduce the overall carbon footprint.

3. Supporting Bulk Services and Infrastructure Provision

The site is serviced by the Walvis Bay Municipality through its network of bulk services. The following bulk services are currently in place and support the proposed project:

3.1. Site Access

The Project Site is accessed from Ben Amathila Avenue. Access is controlled through security guards at the gate. The proposed access road is shown on the *Map* below:

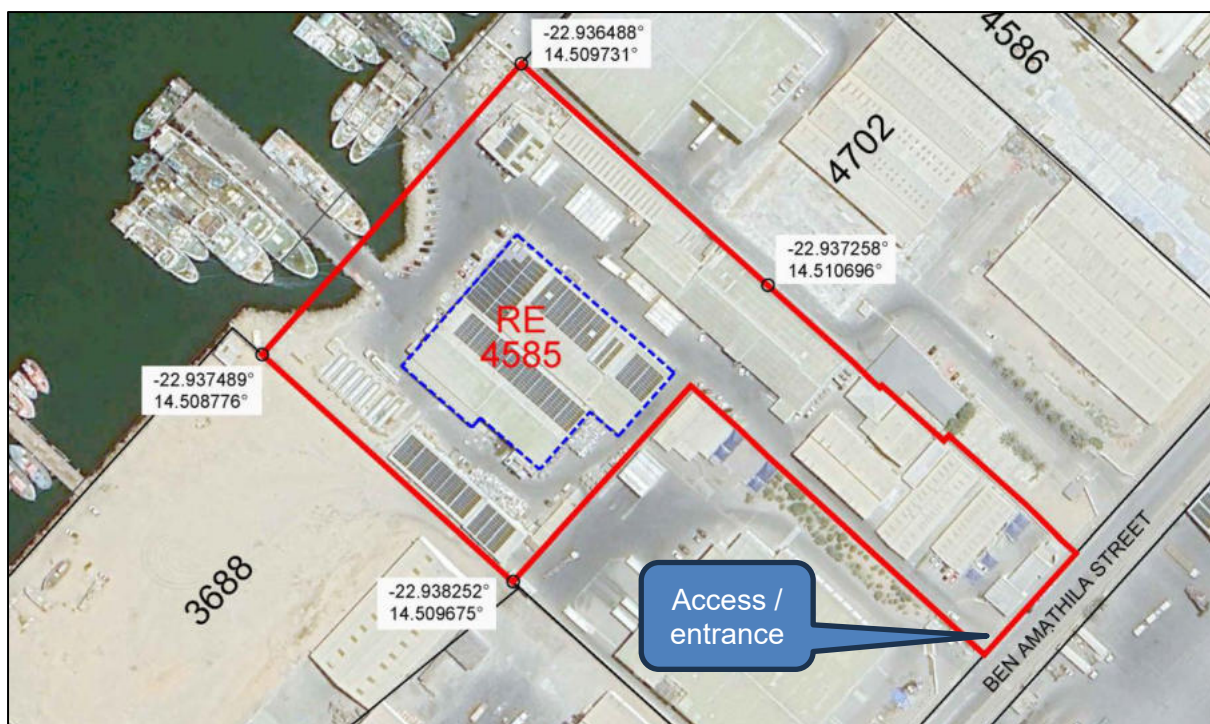


Figure 4: Access / entrance is obtained from Ben Amathila Avenue

3.2. Water supply / requirements

The Proposed Project Site obtains water from the Municipal water reticulation system of Walvis Bay.

The Proponent currently use around 15 000 m³ of municipal water per month and fresh water consumption is expected to increase in the new future. It is the intension to supplement this water with desalinated water from the RO Plant.

3.3. Electricity supply

The site obtains electricity from the ErongoRED network. This electricity is supplemented by electricity generated from onsite solar installations.

The entire SWRO plant will draw ± 90 kW/h of power (380 V, 3-phase, continuous 24 h per day operation) when all duty pumps are in operation.

3.4. Sewage disposal

The site is connected to the municipal sewer network.

“Sewage and grey water collected from kitchen sinks and elsewhere in the facility are discharged into the Walvis Bay Municipal sewer system. Seagull obtained a permit from the Walvis Bay Municipality to discharge this effluent in their system” (*Werner Petrick, 2021*).

Other effluent from the fish factory that is discharged into the port (sea) include:

- wash water (from cleaning the fish),
- some fish scales that end up in the wash water,
- factory wash water and cleaning chemicals, and
- bleed from the cooling towers (*Werner Petrick, 2021*).

3.5. Storm water and drainage

A proper stormwater management plan will be developed to ensure that the infrastructure of the site is safeguarded against a 1:50 year flood risk. The stormwater management will be in accordance with Municipal Regulations.

3.6. Solid waste

Solid waste is sorted on site into the various recyclables, stored in an enclosed area and collected for further sorting, processing and recycling by a professional registered waste management company.

“The types of waste that are generated at the fish factory include:

- hazardous and non-hazardous waste;
- general waste (domestic and other non-hazardous recyclable/re-usable waste); and
- small amount of medical waste (from first aid treatments)” (*Werner Petrick, 2021*).

Solid waste consists of the following:

- Domestic waste,
- Office waste - including papers, light bulbs, empty printer cartridges, redundant electronic equipment, etc.
- Medical waste,
- Non-reusable wooden pallets to store finished products
- Empty chemical containers,
- Redundant PPE and equipment, batteries, tyres from forklifts, etc.
- Used plastic lining, shrink wrap, cartons and waste packaging,
- Non-reusable plastic tubs, bins and pallets,
- Fish scales
- Relatively small volumes of hazardous waste from the workshop, i.e. thinners, lacquers, etc. (*Werner Petrick, 2021*).

3.7. Fire protection

The Proponent have the necessary fire protection infrastructure / extinguishers as per the requirements. A Fire Protection Specialist has been contracted to introduce a proper fire protection plan with the required infrastructure and to oversee the annual auditing and maintenance of the infrastructure. The site will operate under fire control measures as per the Walvis Bay Fire Regulations.

4. Listed activities triggered by the proposed project

In terms of the Environmental Management Act (No. 7 of 2007) and the Environmental Impact Assessment Regulations (GN 30 in GG 4878 of 6 February 2012) an Environmental Impact Assessment (EIA) Report and an Environmental Management Plan is required as the following listed activities are involved:

WATER RESOURCE DEVELOPMENTS

8.1 The abstraction of ground or surface water for industrial or commercial purposes.

8.6 Construction of industrial and domestic wastewater treatment plants and related pipeline systems.

8.12 The release of brine back into the ocean by desalination plants.

INFRASTRUCTURE

10.1 The construction of-

(e) any structure below the high-water mark of the sea;

The proposed project is thus subject to obtaining an Environmental Clearance.

5. Approach to the Environmental Assessment of the Project

The purpose of the Environmental Impact Assessment is to consider social, ecological, legal and institutional issues related to the intended use of the land, guided by the principles and stipulations of the Namibian Environmental Assessment Policy (1995) and Namibia's Environmental Management Act (2007), to determine the desirability of the proposed activities on the suggested area and to develop an Environmental Management Plan (EMP) to mitigate and manage environmental issues identified in the process.

To accomplish the above, the impact study will be undertaken and based on the outcome of the findings; further specialists' investigation might be required to fully assess all impacts.

5.1. Aims of the Assessment Process

- To ascertain existing environmental conditions on the site to determine its environmental sensitivity.
- To inform I&APs and relevant authorities of the details of the proposed activities and to provide them with an opportunity to raise issues and concerns.
- To assess the significance of issues and concerns raised.
- To compile an impact report detailing all identified issues and possible impacts, stipulating the way forward and identify specialist investigations required.
- To outline management guidelines in an Environmental Management Plan (EMP) to minimize and/or mitigate potentially negative impacts.
- To comply with Namibia's Environmental Management Act (2007) and its regulations (2012).

5.2. Methodology

a) Desktop sensitivity assessment

Literature available on the area will be reviewed to determine potential environmental issues and concerns.

b) Site assessment (site visit)

This involves investigating the environmental parameters on site in order to enable further understanding of the potential impacts on site.

c) Involvement of Interested and Affected Parties

Stakeholders will be given the opportunity to comment on the proposed activities and engage in the planning process. The findings of the assessment process will be incorporated in the environmental impact assessment report.

6. Expected Impacts on receiving environment

From previous experience with developments of this nature and comments received from Affected Parties, the following key impacts on the receiving environment can be expected:

6.1. Socio-economic environment

- Community health issues - transmission of diseases from the construction team and support staff to the local community.
- Increase in criminal activities during construction.
- Cultural/heritage impacts.
- Employment will be created during construction and operation.

6.2. Bio-physical environment

- It will decrease ecological pressure on surface water ecosystems.
- Effect on natural and general ambiance of the area and surroundings.
- The use of water during construction and operations.
- The generation of dust during construction and operations.
- Material wastage (packing, building waste) polluting the site and neighbouring environment.
- Health and safety of construction and operational staff if not attended to satisfactorily.
- Impact on surface and seawater.
- Noise during construction of bulk services as well as from the operations once constructed and in operation.
- Electricity is required for the operation of the facility.

These impacts and others which will be identified during the environmental scoping procedures and the engagement of the interested and affected parties will be evaluated to determine the significance of impact and if and how these impacts can be mitigated.

The above-named aspects will be covered in the Environmental Management Plan to be mitigated.

7. Public Involvement Program

During the public consultation process, Green Earth Environmental Consultants do the following:

- Identify and inform key stakeholders, authorities, the local authority (municipality), and interested or affected members of the public (I&APs).
- Give notice of the proposed activity as per the requirement of the Regulations through national newspapers, site notices and letters.
- Provide I&APs with additional information on the proposed activity by sending them this Background Information Document (BID).
- Schedule a public meeting if there is enough public interest to which all registered and identified I&APs will be invited, facilitate stakeholder participation and engagement and provide details of issues raised during the public involvement program and scoping exercise.
- Record all comments of I&APs, supported by responses provided by Green Earth, in a report to be included in the EIA.
- Inform the Proponent of comments relevant to the project's planning, implementation and operations and for inclusion in the EMP and consideration.

As an important part of the Environmental Impact Assessment process, you as stakeholder or interested member of the public are invited to find out more about what is being proposed, the implications thereof on the environment and/or to raise any issues or concerns.

Should you have any questions regarding the project, please contact **GREEN EARTH Environmental Consultants** at the contact details (*Charlie du Toit: 081 127 3145 or carien@greenearthnamibia.com*) provided on *Page 1* of this document. **The closing date for any questions, comments, inputs or information is 24 February 2026.**

A public meeting will be held on 23 (Monday) February 2026 at 11h00 at the site.

