

BACKGROUND INFORMATION DOCUMENT

**ENVIRONMENTAL SCOPING ASSESSMENT AND
ENVIRONMENTAL MANAGEMENT PLAN FOR THE STORAGE
AND HANDLING OF MANGANESE ORE IN THE PORT OF
LÜDERITZ**

LÜDERITZ BAY SHIPPING & FORWARDING



October 2021

1 INTRODUCTION

The Namibian Ports Authority, Namport, invited bids for the development and operations of a common user manganese export terminal (CUMET) in the Port of Lüderitz. The terminal will receive manganese ore from mines located in the Northern Cape of South Africa and will be responsible for the temporary stockpiling and subsequent loading of the ore onto vessels berthed in the Port of Lüderitz. Through this development, the Port of Lüderitz will be boosted as a reliable and efficient port of choice for the export of manganese ore from southern Africa to international clients.

Lüderitz Bay Shipping & Forwarding (Pty) Ltd (the Proponent) was awarded the bid and now initiated an environmental impact assessment (EIA) process with the aim of obtaining an environmental clearance certificate (ECC) for the proposed CUMET project. The scope of the EIA include all port bound activities from the point of entry into the port and inclusive of the loading of barges berthed in the port. The Proponent appointed Geo Pollution Technologies (Pty) Ltd (GPT) as independent environmental consultant to conduct the EIA and to apply for the ECC. The ECC is required in terms of the Environmental Management Act No. 7 of 2007 (EMA) and will be conducted according to the EMA regulations as published in 2012. As part of the process and the ECC application, the EIA and an accompanying environmental management plan (EMP) will be submitted to the Ministry of Environment, Forestry and Tourism's Directorate of Environmental Affairs (DEA).

2 PURPOSE OF THE BID

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

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

3 PROJECT DESCRIPTION

Manganese ore is mined extensively in the Northern Cape province of South Africa. As a result of already congested ports and related logistical challenges in South Africa, alternative avenues for the export of ore from South Africa to international markets are considered. Namport recognized the business opportunity this presents to Namibia's Port of Lüderitz and thus, initiated the CUMET project. Activities of the CUMET project which are considered for the environmental assessment, are divided into the following phases: planning, construction (inclusive of continued maintenance), operational and decommissioning phases. A brief outline of expected activities for each phase is detailed below.

3.1 PLANNING PHASE

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

- ◆ Obtain permits and approvals from local and national authorities.
- ◆ Ensure compliance to land use rights.
- ◆ Appoint a health, safety and environmental coordinator to implement the EMP.
- ◆ Provide for a fund to cater for environmental incidents such as pollution clean-up and ecological restoration if ever required.
- ◆ Ensure all appointed contractors and employees enters into an agreement which includes the EMP.

- ◆ Establish and / or maintain a reporting system to report on aspects of construction, operations and decommissioning as outlined in the EMP and as required by the DEA.

3.2 CONSTRUCTION

A warehouse will be constructed in the Port of Lüderitz. The warehouse will be fully enclosed and cover 12,000 m². Conveyors, also fully enclosed, will be installed towards the quay side and will be used for ship loading purposes. Dust suppression systems and all necessary utilities and support infrastructure will be installed. Construction activities will involve some earthworks, concrete casting and building / assembly of the warehouse and conveyor systems.

3.3 OPERATIONAL PHASE

Manganese ore will be received by third parties via road and rail from the Northern Cape. The ore will be offloaded directly in the warehouse where it will be stockpiled using front-end loaders and excavators. Barges will berth at the nearby quay wall and ore will be loaded directly into the barges' hulls, via the enclosed conveyors. Once a barge is full, it will leave the port and proceed to the transshipment location (not part of the EIA). It is envisioned that 1.4 million metric tonnes of ore can be exported via the CUMET per annum. Dust suppression will be conducted inside the warehouse, while the enclosed conveyor and dust suppression on the barge itself, will prevent dust from escaping during loading. Administrative tasks, site security and cleaning of the premises will continue on a daily basis to ensure the effective and clean operations of the facility. Environmental compliance monitoring and public liaison will continue throughout operations.

3.4 DECOMMISSIONING PHASE

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

3.5 PRELIMINARY IDENTIFIED IMPACTS

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

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

4 PUBLIC CONSULTATION

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

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

A public meeting to engage with the local community will be conducted in Lüderitz. The time and venue details will be communicated to registered IAPs.

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



Figure 1. Project location

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

Geo Pollution Technologies (Pty) Ltd
 Telephone: (+264-61) 257411
 Fax: (+264) 88626368
 e-mail: manica@thenamib.com

Your Rights as an IAP according to the Environmental Management Act, No7 of 2007, Government Notice No 30 (Environmental Impact Assessment Regulations)*Section 23.*

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

Section 24:

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