

**ENVIRONMENTAL SCOPING ASSESSMENT AND ENVIRONMENTAL
MANAGEMENT PLAN FOR MINING OF SALT WITH SALT CRYSTALLISER
PONDS AT THE MILE 68 SALT PAN**

BACKGROUND INFORMATION DOCUMENT



Prepared by:



Prepared for:

Brutum Mining (Pty) Ltd

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1 INTRODUCTION

Brutum Mining (Pty) Ltd (the Proponent) has applied for mining claims (CLM) CLM76248, CLM76249, CLM76251, CLM76252, CLM76253, CLM76254 and CLM76255 at the Mile 68 salt pans, along the central Namibian coastline within the Dorob National Park, north of Henties Bay (refer to Figure 1). The majority of the area encompassed by the mining claims has historically been operated as solar (crystaliser) salt mines, and it is the Proponent's intention to revive salt mining in the claims. Project development will include the preparation of crystalliser ponds, construction of processing infrastructure, as well as associated support facilities and services required for the production and harvesting of salt. Operations will entail pumping of brine from the Cape Cross salt mine, via an approximately 13 km pipeline, and allowing the water to evaporate before harvesting the salt.

The proposed project is listed in terms of the Environmental Management Act, Act No. 7 of 2007 (EMA) as a project requiring an environmental clearance certificate (ECC) as issued by the Ministry of Environment, Forestry and Tourism's Department of Environmental Affairs (DEA). To apply for an ECC, a scoping environmental impact assessment (EIA) report and an environmental management plan (EMP) for the project have to be submitted to the DEA. The EIA and EMP will serve to inform the DEA and any other relevant authority about the potential positive and negative impacts of the project, to allow them to make an informed decision regarding the granting or refusal of the ECC.

Geo Pollution Technologies (Pty) Ltd (GPT) has been appointed by the Proponent to conduct the EIA, prepare the EMP, and make a recommendation on whether the ECC should be issued or not, to the DEA. The EIA and EMP will include all construction, operational, and maintenance activities associated with the salt mining operations, and will be prepared according to the Regulations of the EMA.

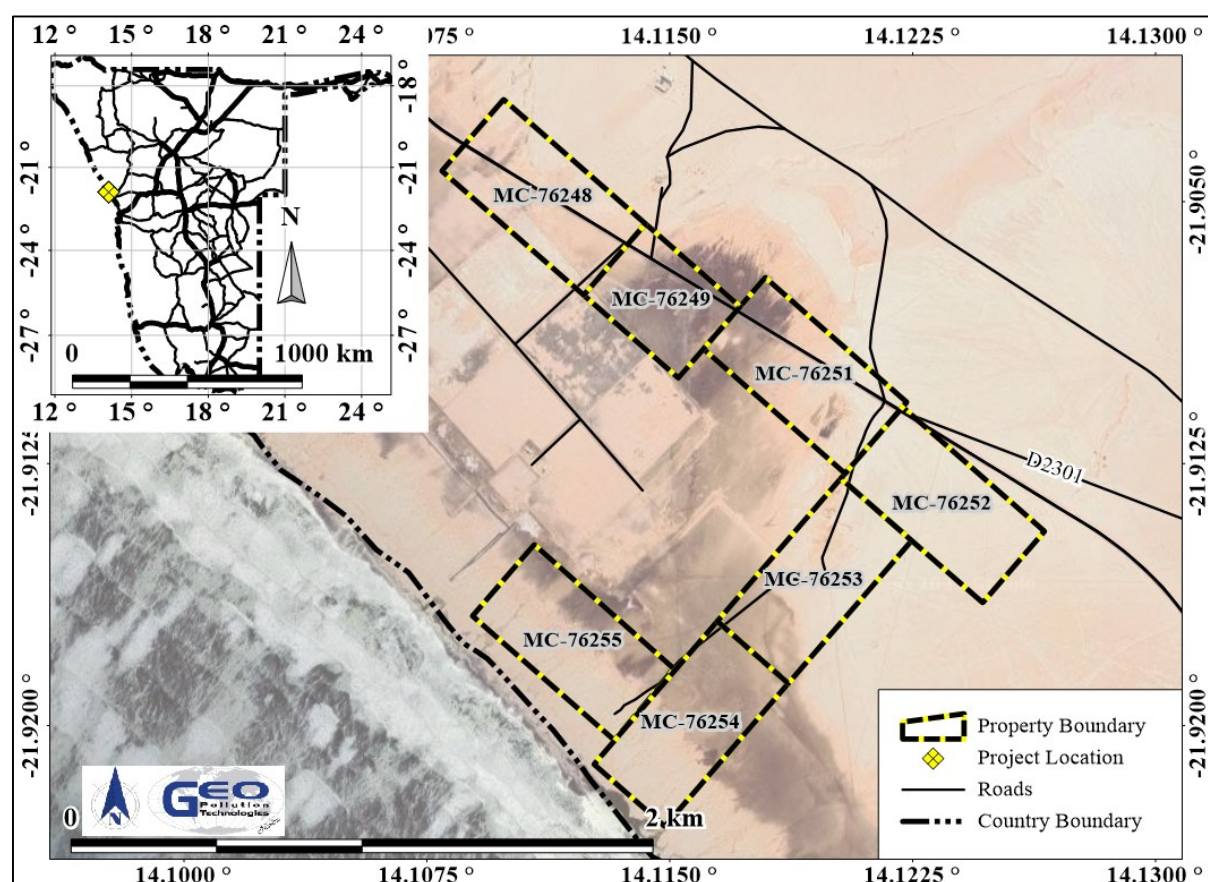


Figure 1 Project location

2 PURPOSE OF THE BID

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

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

3 PROJECT DESCRIPTION

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

3.1 PLANNING PHASE

While planning for construction, operations, and decommissioning of the salt mining activities, 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 or similar to implement the EMP.
- ◆ Provide for a fund to cater for environmental incidents such as pollution clean-up and ecological restoration if ever required.
- ◆ Ensure all appointed contractors and employees enter into agreements which includes the EMP.
- ◆ Establish and / or maintain a reporting system to report on aspects of construction, operations, and decommissioning as may be stipulated in the conditions of the ECC and as outlined in the EMP.

3.2 CONSTRUCTION

The project will be developed within the existing disturbed salt pan area between Mile 65 and Mile 68. The main construction activities will include

- ◆ Construction of salt pan crystallisers in the form of shallow ponds with sand embankments. This will mainly require earthworks using earthmoving equipment.
- ◆ Construction of a salt processing facility which will include fuel storage and power generation facilities.
- ◆ Re-routing of a section of the C34 road.
- ◆ Construction of a new 13 km brine pipeline from the Cape Cross salt pan.
- ◆ Construction of bitterns discharge pipeline(s).

All construction activities will be confined to the designated mining area and associated infrastructure corridors and will be carried out in accordance with standard environmental management and safety practices. Approvals will be obtained from the relevant authorities for aspects such as rerouting of the C34 road.

3.3 OPERATIONAL PHASE

During the operational phase, brine from the Cape Cross salt pan will be supplied via the newly constructed pipeline and distributed to the crystalliser ponds within the mining area. Through natural solar evaporation, salt will crystallise within the ponds. Bitterns, the concentrated, salty liquid left

over after sodium chloride precipitates from brine in salt ponds, will be discharged through a dedicated pipeline to the coast under controlled conditions to ensure dilution and dispersion. Once sufficiently dry, the crystallised salt in the ponds will be harvested and trucked to the processing facility. Harvested salt will be washed, drained, and processed at the on-site processing plant before being stockpiled for transport.

Regular activities will include salt harvesting, brine and pond management, equipment and vehicle maintenance, waste handling, housekeeping, site security, and administrative functions to ensure safe and efficient operations.

3.4 DECOMMISSIONING PHASE

Decommissioning of the salt mine is not foreseen during the validity of the ECC. Decommissioning will however be assessed, since some maintenance activities or upgrades may require periodic decommissioning and replacement of equipment and infrastructure. Where decommissioning occurs, rehabilitation of the area may be required. Should the project cease, decommissioning will entail rehabilitation of the salt pan, partial or complete removal of all infrastructure, including buildings and underground infrastructure not required for future land use. After decommissioning, any pollution present on the site must be removed or remediated.

3.5 PRELIMINARY IDENTIFIED IMPACTS

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

- ◆ Human component (employee and visitor health and safety).
- ◆ Infrastructure (aesthetics, integrity, etc.).
- ◆ Neighbours (noise, aesthetics, waste, traffic).
- ◆ Groundwater, surface water and soil (brine, hydrocarbon spills, effluent generation and disposal, waste, pollutants).
- ◆ Ecosystem and biodiversity (habitat disturbance, pollutants).
- ◆ Social and cultural aspects (demographic processes, tourism, recreation, etc.).
- ◆ Economic characteristics (revenue generation, employment, training, skills).

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
- ◆ Organisation represented or private interest
- ◆ Position in the organisation
- ◆ Contact details
- ◆ Any direct business, financial, personal or other interest which you may have in the approval or refusal of the application

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

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



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

Section 23.

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

Section 24:

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