

**ENVIRONMENTAL SCOPING ASSESSMENT AND ENVIRONMENTAL
MANAGEMENT PLAN FOR THE OPERATIONS OF OIL AND GAS SHORE-BASE
EQUIPMENT STORAGE, INSPECTION AND CHEMICAL-STORAGE FACILITIES
ON ERVEN, 520, 521, 530, 752 AND 786 IN NAUTILUS EXTENSION 1,
LÜDERITZ, //KHARAS REGION**

BACKGROUND INFORMATION DOCUMENT



Prepared by:



Prepared for:



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1 INTRODUCTION

Namibia is experiencing significant growth in offshore oil and gas exploration activities. These activities require supporting shore-base infrastructure for the storage, inspection, cleaning and preparation of specialised equipment, as well as the storage and handling of various chemicals and products. Logistics Support Services (Pty) Ltd (the Proponent) operates what they refer to as the Dubai Yard to provide such services to oil and gas operators and service providers in Lüderitz. The property comprises of erven 520, 521, 530, 752 and 786, all zoned for industrial use (Figure 1).

Geo Pollution Technologies (Pty) Ltd (GPT) was appointed by the Proponent to undertake an environmental assessment for the operation of the Yard. The Dubai Yard covers approximately 38,000 m². Facilities are already developed on the Yard and are used for oil and gas shore-base activities, including the storage of equipment, materials and chemicals.

The Proponent requested that an application for an environmental clearance certificate (ECC) for the proposed construction and operational activities on the property be lodged with the Ministry of Environment, Forestry and Tourism (MEFT). The ECC application will be made in terms of the Environmental Management Act, Act No. 7 of 2007 (EMA). A scoping environmental impact assessment (EIA) report and an environmental management plan (EMP) will be submitted to the MEFT's Department of Environmental Affairs (DEA) in support of an application for an ECC. The environmental assessment will include all potential construction (including future minor upgrades and maintenance) and operational activities associated with the planned project.

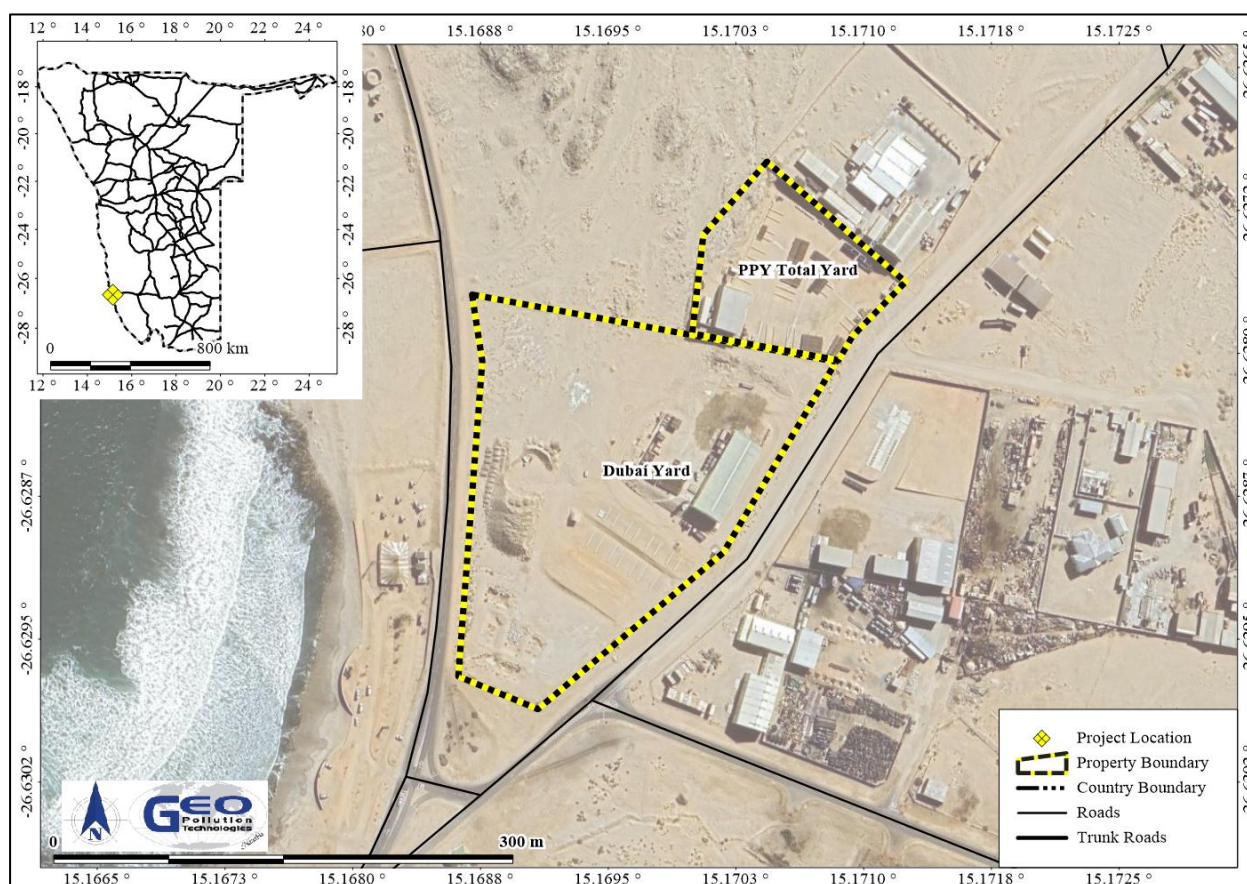


Figure 1-1 Project location

2 PROJECT DESCRIPTION

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

2.1 PLANNING PHASE

While planning for construction, operations, and decommissioning of the warehouses, 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 outlined in the EMP and as required by the DEA.

2.2 INFRASTRUCTURE AND CONSTRUCTION

The Yard is existing with developed facilities. Existing infrastructure includes warehouses and covered storage areas, workshops and material-assembly areas, a bunded area for inert liquid products, pipe inspection and cleaning facilities, a washing bay, casing-storage areas, buffer and transit areas, and areas for the storage of oil and gas equipment and containers. The casing-storage areas have a ground-bearing capacity exceeding 20 t/m².

No new construction activities are currently planned for the property. Construction-related activities considered in the assessment will therefore primarily relate to the continued maintenance, repair or replacement of existing infrastructure. The pipe inspection and cleaning facilities and washing bay will be equipped with contained water-collection systems and oil separators. Provision will be made for the reuse of collected water where possible to reduce water consumption.

2.3 OPERATIONAL PHASE

The Yard is and will be used for oil and gas shore-base activities. These activities will include the receipt, storage, handling, inspection, cleaning, assembly and dispatch of equipment and materials. Casing and other oil and gas equipment will be stored in designated areas, while buffer and transit areas will be used to temporarily stage equipment and materials before they are transported to vessels in the Port of Lüderitz.

Various liquid and solid chemicals may be stored at the facilities. These may include biocides, gelling agents, non-emulsifying agents, solvents, corrosion inhibitors, acids, solid chemical products, oxidising breakers, lubricants and similar products required for oil and gas activities. The available chemical list is indicative, and similar products may also be stored where required.

Chemicals will generally be received and stored in intermediate bulk containers, drums, cans, bags or buckets. Products will be stored and handled according to their applicable storage requirements, including the segregation of incompatible products.

Water generated during pipe and equipment cleaning will be directed to the contained collection system and oil separator. Collected water may be reused where suitable.

2.4 DECOMMISSIONING PHASE

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

2.5 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 dust, hydrocarbon spills, effluent generation and disposal, waste, pollutants).
- ◆ Ecosystem and biodiversity (dust, pollutants).
- ◆ Social and cultural aspects (demographic processes, sense of place, community services etc.).
- ◆ Economic characteristics (revenue generation, employment, training, skills, revenue).

3 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 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.