

**ENVIRONMENTAL SCOPING ASSESSMENT AND ENVIRONMENTAL
MANAGEMENT PLAN FOR THE STORAGE AND HANDLING OF INDUSTRIAL
CHEMICALS AND PRODUCTS ON ERVEN 1945, 3687, 3686 AND 1238 IN THE
INDUSTRIAL AREA OF WALVIS BAY**

BACKGROUND INFORMATION DOCUMENT



Prepared by:



Prepared for:

Link Chemical Services

July 2024

1 INTRODUCTION

Namibia is experiencing significant growth in the oil, gas and mineral resource exploration and mining industries. These industries typically require a wide range of industrial chemicals and products of varying volumes. Link Chemical Services (the Proponent) therefore wish to develop storage and handling facilities in order to procure, store and supply the required industrial chemicals and products to such industries.

Geo Pollution Technologies (Pty) Ltd (GPT) was appointed by the Proponent to undertake an environmental assessment for the proposed storage and handling of industrial chemicals on erven 1945, 3687, 3686 and 1238, Walvis Bay, Erongo Region (Figure 1-1). The Proponent has identified three options on the site for storage and handling of chemicals, and may ultimately decide to utilise one or more of the three options. The options include two existing warehouses that will require some upgrades, and one area earmarked for construction of a completely new warehouse. The options are, for purposes of this document, referred to as Option 1, 2 and 3, and are indicated in Figure 1-2.

The Proponent requested that an application for an environmental clearance certificate (ECC) for the proposed operations of the warehouses 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 upgrades and maintenance) and operational activities associated with the planned project.

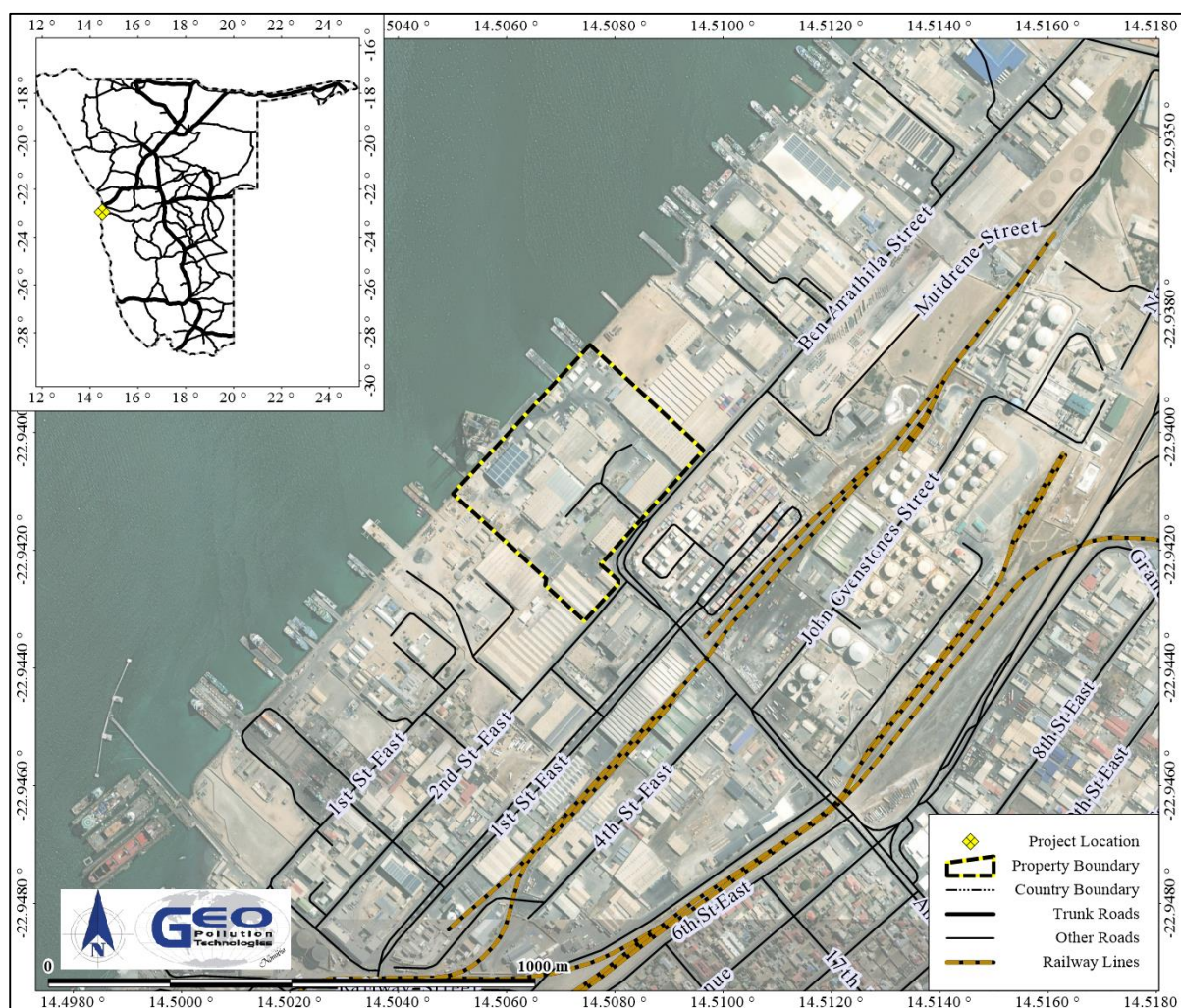


Figure 1-1 Project location



Figure 1-2 Warehouse options

2 PROJECT DESCRIPTION

Activities which are considered for the environmental assessment are divided into the following phases: planning, construction (upgrades and 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

Erven 1945, 3687, 3686 and 1238 is developed as one property with existing warehouses and factories in the industrial area of Walvis Bay. For Option 1 and 2, the warehouses will require some upgrades and refurbishment to ensure it meets the requirements for the storage of industrial chemicals. Should Option 3 be pursued, a completely new warehouse will be constructed which will be custom built for purposes of storage of the various chemicals. Key aspects that will be upgraded

or incorporated into the warehouses include structures for the segregation of incompatible products, impermeable surfaces, fire detection and suppression systems, emergency eye wash stations and showers, security features, offices and ablutions.

2.3 OPERATIONAL PHASE

A wide range of chemicals and products will be stored in the warehouse(s). These may range from inert and harmless products to potentially hazardous chemicals with varying hazard characteristics. All incompatible products will be segregated at all times and storage and handling will be strictly according to material safety data sheet instructions. All personnel will be suitably trained to handle the products and equipment on site and such training will also include first aid and firefighting training of selected personnel. Products will be received by truck and will mostly be break-bulk and containerised cargo, but bulk cargo may also be included where required. Should bulk cargo in the form of dust producing dry bulk powders, or similar, be handled, dust containment or suppression will be performed when required.

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.

2.4 DECOMMISSIONING PHASE

Decommissioning of the warehouses 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. It is possible that some asbestos containing building materials are still present on site. The removal and disposal of these should be in accordance with Namibian law and by a qualified contractor. 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 organization
- ◆ 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.