

**HARVESTING OF THE WHITE MUSSEL, *DONAX SERRA*, ALONG THE NAMIBIAN
COASTLINE, NORTH OF LÜDERITZ**

BACKGROUND INFORMATION DOCUMENT



Prepared by



Prepared For

Citygate Trading CC

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1 INTRODUCTION

Citygate Trading CC (the Proponent) has been granted a harvesting right for white mussels (*Donax serra*) by the Ministry of Agriculture, Fisheries, Water and Land Reform (MAFWLR). The right applies to a defined section of coastline within the //Tsau Khaeb (Sperrgebiet) National Park, north of Boat Bay (Figure 1). The Proponent intends to harvest mussels by hand in accordance with the conditions of the right and in consultation with MAFWLR scientists to ensure sustainability. Harvested mussels will be transported to Lüderitz, where they will be processed and prepared for export to international markets.

The Proponent requested Geo Pollution Technologies (Pty) Ltd (GPT), to undertake an environmental assessment for the harvesting of white mussels (*Donax serra*) and the establishment of a temporary campsite within the //Tsau Khaeb (Sperrgebiet) National Park. The environmental assessment is required in order to apply for an environmental clearance certificate (ECC) for the harvesting activities, temporary camp setup, and associated processing operations in Lüderitz. 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) are proposed to be submitted to the Ministry of Environment, Forestry and Tourism's Department of Environmental Affairs (DEA) in support of an application for an ECC. The environmental assessment will include all operational activities associated with the project.

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 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

The genus *Donax* comprise marine clams (bivalve molluscs) which are filter feeders living in the sand of intertidal sandy shores. The distribution of the species *Donax serra*, or white mussel as it is commonly referred to, is from northern Namibia (Kunene River mouth) to the Eastern Cape in South Africa. In Namibia it is mainly utilised by fisherman as bait. However, marine clams are popular as food elsewhere in the world. Currently, no commercial harvesting of clams for food purposes are conducted in Namibia. The Proponent thus intends to harvest this resources for export markets.

For purposes of the environmental assessment, activities associated with the project have been divided into the following phases: planning, operational and the decommissioning phase. A brief outline of expected activities for each phase is detailed below.

3.1 PLANNING PHASE

Planning is an ongoing process and includes planning for various phases of the project. As part of the planning phase, it is the responsibility of the Proponent to ensure they are, and remain, compliant with all legal requirements that govern their activities. All required management measures must be in place prior to and during all phases, to ensure potential environmental impacts and risks are minimised. Typical planning activities include:

- ◆ Obtain permits and approvals from relevant authorities (e.g. national park entry permits, permits to enter restricted diamond areas, etc.).
- ◆ Ensure continued compliance to harvesting and land use rights.
- ◆ Appoint a health, safety and environmental coordinator to implement the EMP and prepare and update various emergency response plans, waste management plans, etc.

- ◆ Provide for a fund to cater for environmental incidents such as pollution clean-up and ecological rehabilitation, if ever required.
- ◆ Ensure all appointed contractors and employees enter into an agreement which includes the EMP.
- ◆ Establish and / or maintain a reporting system to report on aspects of harvesting, operations and decommissioning as outlined in the EMP and as required by the DEA.

3.2 THE OPERATIONAL PHASE

The harvesting right granted to the Proponent covers a defined section of coastline within the //Tsau Khaeb (Sperrgebiet) National Park, north of Boat Bay. Harvesting will be conducted by hand during low tide and only mussels meeting the size requirements of the MAFWLR will be retained, while undersized individuals will be returned to the sand. Access to harvesting areas will be by four-wheel drive vehicles. To improve efficiency, a temporary tented camp will be erected and fully dismantled once harvesting operations end.

All harvested mussels will be transported to Lüderitz where they will be processed at the Proponent's facility, within the designated mariculture area, and prepared for export. Waste will be strictly managed, with no refuse discarded onshore and all waste returned to Lüderitz for disposal at approved facilities. Scientists from MAFWLR will periodically accompany the harvesting teams, and monitoring will continue to ensure sustainable harvesting and the long-term viability of the resource.

3.3 DECOMMISSIONING PHASE

Decommissioning is limited to the vacating of harvesting sites, the dismantling of the temporary campsite, and potential future decommissioning of the processing facility in Lüderitz. After harvesting at the site has been completed, the Proponent will ensure that no waste, temporary structures, or equipment remain behind. The processing facility in Lüderitz is not expected to be decommissioned within the validity period of the harvesting right and ECC. However, decommissioning considerations remain relevant, as activities such as the removal of old infrastructure during maintenance or upgrades form part of decommissioning. Where decommissioning does occur, rehabilitation of the affected area may be required. Decommissioning will entail the partial or complete removal of all infrastructure, including temporary camps, buildings, and underground services, which are not required for future land use. Any pollution present on the site at the time of decommissioning must be removed or remediated in accordance with Namibian environmental legislation.

3.4 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:

- ◆ Ecosystem and biodiversity (sustainability of the resource, pollution, bird and other desert dwelling animals)
- ◆ Human component (employee health and safety)
- ◆ Infrastructure (aesthetics, fire, integrity, etc.)
- ◆ Neighbours (noise, aesthetics, waste, traffic, air quality)
- ◆ Groundwater, surface water and soil (hydrocarbon spills, effluent generation and disposal, waste, pollutants)
- ◆ Social and cultural aspects (demographic processes, social ills, community services, heritage and archaeology, 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 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.

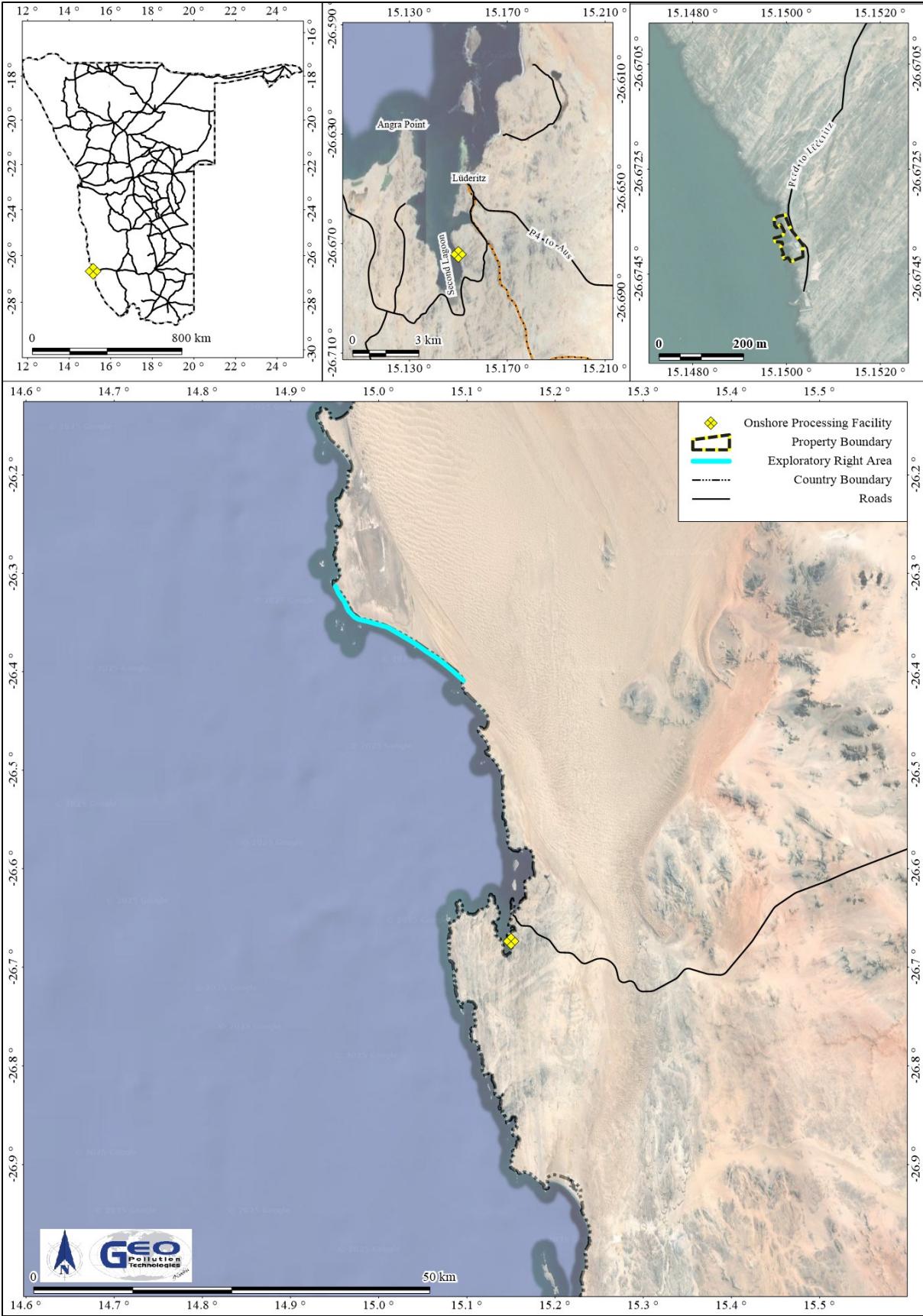


Figure 1 Project location