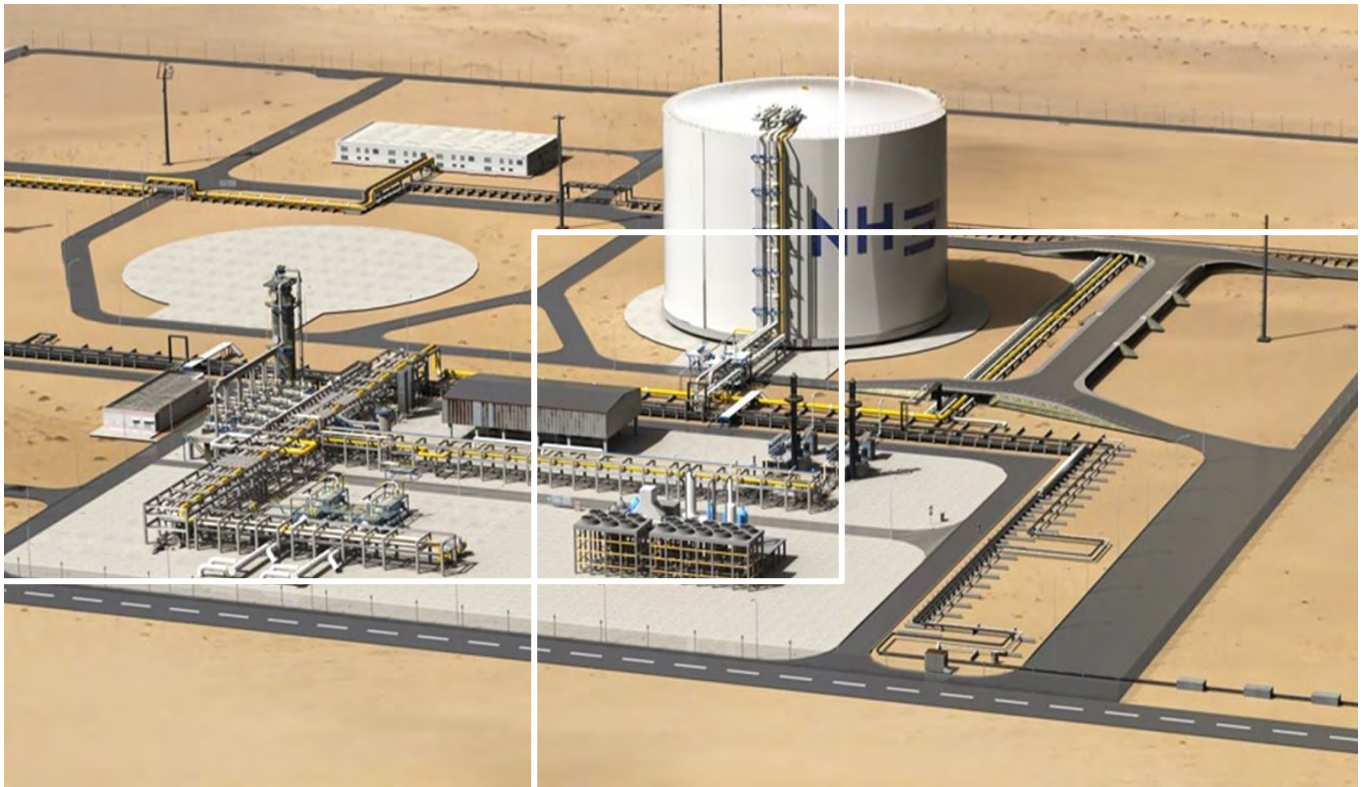




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ADDENDUM REPORT:

I&AP COMMENTS AND RESPONSES ON SCOPING REPORT FOR THE PROPOSED CONSTRUCTION OF THE AMMONIA TERMINAL, WALVIS BAY PORT AREA, ERONGO REGION, NAMIBIA

PROJECT NUMBER: ECC-145-453-REP-14-D

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proposed construction of the ammonia terminal, Walvis Bay
port area, Erongo Region, Namibia

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TABLE OF CONTENTS

1	Introduction	4
1.1	Purpose of the comments consolidated report	4
2	Summary of comments from I&APs	5
2.1	Introduction	5
2.2	Key feedback on issues of concern	5
3	Draft scoping report – comments and responses.....	6
4	Acknowledgements.....	8

LIST OF TABLES

Table 1 – Comments and feedback from scoping report public review period received	6
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LIST OF APPENDICES

Appendix A – Document received from Mr. Ziggy Hentze during the public review period	8
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ABBREVIATIONS

Abbreviation	Description
EAP	environmental assessment practitioner
ECB	electricity control board
ECC	Environmental Compliance Consultancy (Pty) Ltd
EMA	Environmental Management Act No.7 of 2007
ESIA	environmental and social impact assessment
ESMP	Environmental and social management plan
I&APs	interested and affected parties
JWBRA	Joint Walvis Bay Resident Association

1 INTRODUCTION

1.1 PURPOSE OF THE COMMENTS CONSOLIDATED REPORT

This document, compiled after the designated review period, present the comments received from the public and registered interested and affected parties (I&APs) regarding the draft scoping report for the proposed green ammonia terminal construction at Walvis Bay port area, Erongo Region, Namibia.

The draft scoping report was completed for the Project and undertaken in accordance with the requirements of the Environmental Management Act, 2007 (Act No. 7 of 2007) and the Environmental Impact Assessment Regulation, 2007 (No. 30 of 2011) gazetted under the Environmental Management Act (EMA), 2007 (Act No. 7 of 2007).

Environmental Compliance Consultancy (ECC) Pty Ltd, the appointed environmental assessment practitioner (EAP) for the project, prepared the scoping report. The report was available for public and registered I&AP review for a 14- day period from June 10th to June 24th, 2024.

This document consolidates all comments received during the public review period and presents the responses from ECC and the Proponent.

2 SUMMARY OF COMMENTS FROM I&APS

2.1 INTRODUCTION

In accordance with the Regulations of the EMA 2007, on the 10th of June 2024 the scoping report was circulated electronically to all registered interested and affected parties (I&APs) and identified key stakeholders. An email has been received from a Walvis Bay resident which was collated in a separate “Comments and Responses” table that are presented in Table 1. A document was received by a Langstrand resident and member of the Joint Walvis Bay Residents Association (JWBRA) provided in Appendix A, with a response provided in Table 1 below.

2.2 KEY FEEDBACK ON ISSUES OF CONCERN

The scoping report was provided to all I&APs, identified stakeholders and made publicly available on ECC’s website. This public review period is set out to solicit comments, feedback, and allow genuine participation in the ESIA process. Concerns were raised by a Walvis Bay resident, Mrs. S Bachmann, relating to the dangers of ammonia. Mr. Ziggy Hentze, a member of the Joint Walvis Bay Residents Association, shared a document which outlines the potential health and safety risks associated with the proposed project. The key areas raised from the review of the I&APs’ comments can be summarised as follows:

The dangers of ammonia towards humans, fauna and the environment

Mrs. S Bachmann expressed disapproval of the proposed ammonia terminal due to its proximity to the ocean and the impacts ammonia will have on fish in the ocean, the environment and surrounding residents. In a document drafted by Mr. Hentze, the human and animal impacts are highlighted by potential exposure to ammonia in general, ammonia leaks and explosions. The environmental assessment practitioner (EAP) assures that all potential environmental and social impacts of the project will be assessed during the in environmental and social impact assessment (ESIA) and mitigation measures will be included in both the ESIA and the environmental and social management plan (ESMP). Additionally various specialist studies will be incorporated as stated in the scoping report (chapter 7) to assess all relevant aspects, to ensure mitigation measures are in place and recommendations are considered.

Health impacts associated with construction activities

Mr. Hentze expressed how the construction activities of the ammonia terminal would negatively impact surrounding residents and local animal life. The proponent will be provided with an ESMP which will outline the best practices and measures to mitigate aspects such as noise, dust and disturbance, which will be applied during the construction activities. Additionally, the proponent will provide a platform for surrounding communities and stakeholders to raise concerns during construction activities.

3 DRAFT SCOPING REPORT – COMMENTS AND RESPONSES

Table 1 – Comments and feedback from scoping report public review period received

Stakeholder name and method through which feedback was received	Comments/Questions Received	Response/Clarification
Mrs. S Bachmann Walvis Bay resident Received via email	I thank you for involving us, as the Walvis Bay community, to have a say into this proposal. For the fear of ammonia storage tanks and the effect that ammonia might have on the community, and on our fish and ocean. I am not approving this proposal for the following reasons: - The site identified is too close to the ocean and residential houses. - Ammonia can be acutely toxic to fish mainly due to its effect on the central nervous system, because it causes “acute ammonia intoxication” - which includes convulsions and death. - Ammonia is a key component of the nitrogen cycle in streams, where it may be dissolved in the water column or associated with sediments. At high enough concentrations, ammonia can be toxic to aquatic organisms.	The comments are noted and will be incorporated in ESIA and ESMP. These documents will also be shared for public review.

Stakeholder name and method through which feedback was received	Comments/Questions Received	Response/Clarification
	– High levels of ammonia can irritate and burn the skin, mouth, throat, lungs, and eyes. Very high levels of ammonia can damage the lungs or cause death. – Ammonia itself and the nitrogen deposition resulting from ammonia emissions negatively affect biodiversity. Ammonia is one of the main sources of nitrogen pollution, alongside nitrogen oxides.	
Mr Ziggy Hentze Joint Walvis Bay Residents Association – Document received via email	See appendix A	Kindly note that all potential dangers and risks associated with the proposed project will be assessed during the larger ESIA. The ESIA includes various specialist studies that was described in Chapter 7 (Terms of Reference) of the scoping report. Best practices and mitigation measures will be included in the ESIA and ESMP. These documents will also be shared for public review.

4 ACKNOWLEDGEMENTS

Through the ESIA process, the Proponent and ECC have endeavoured to provide a platform to hear and address all relevant comments put forward by I&APs. ECC would like to thank the I&APs and stakeholders for providing feedback during the scoping phase of the ESIA process. We acknowledge and appreciate the time required to review these documents and ECC genuinely appreciate the input provided by I&APs. The valuable feedback received during the scoping report phase of the ESIA process will ensure a robust impact assessment is submitted to the relevant authorities for a record of decision to be made. ECC acknowledges that constructive feedback results in an improved ESIA and a project that is understood by the community and I&APs.

APPENDIX A – DOCUMENT RECEIVED FROM MR. ZIGGY HENTZE DURING THE PUBLIC REVIEW PERIOD

Safety and Health Concerns Not Adequately Addressed in the Proposed Ammonia Terminal Project

1. Introduction

This document outlines the safety and health issues related to the proposed construction of an ammonia terminal, ammonia pipeline, and hydrogen pipeline in the Walvis Bay port area, Erongo Region, Namibia, that have not been adequately addressed in the Environmental and Social Impact Assessment (ESIA) and related documents. The aim is to highlight the potential risks to humans and animals and to stress the importance of addressing these concerns to ensure the safety and well-being of the community.

2. Key Safety and Health Concerns

2.1. Ammonia Exposure Risks

2.1.1. Human Health

- **Acute Exposure:** Inhalation of ammonia can cause immediate health issues such as respiratory irritation, coughing, and throat burns. High concentrations can lead to severe respiratory distress, pulmonary edema, and even death.
- **Chronic Exposure:** Long-term exposure, even at lower levels, can result in chronic respiratory conditions, eye irritation, and skin problems. Workers at the terminal and nearby residents could be at risk of prolonged exposure.

2.1.2. Animal Health

- **Respiratory Issues:** Animals exposed to ammonia fumes can suffer from respiratory problems similar to humans, including irritation of the respiratory tract and lungs.
- **Behavioral Changes:** High levels of ammonia can affect animal behavior and physiology, potentially leading to decreased survival rates, especially in sensitive species.

2.2. Risk of Ammonia Leaks and Spills

2.2.1. Human Health

- **Evacuation Procedures:** The documents lack detailed evacuation plans for the community in the event of an ammonia leak or spill. Immediate and effective evacuation is critical to prevent exposure.
- **Emergency Response:** There is insufficient information on the preparedness and training of local emergency response teams to handle ammonia-related incidents.

2.2.2. Animal Health

- **Habitat Contamination:** Ammonia spills can contaminate soil and water sources, adversely affecting local wildlife and livestock. This contamination can lead to acute poisoning and long-term health effects.
- **Food Chain Impact:** Contaminated vegetation and water can enter the food chain, impacting a wide range of species and potentially leading to bioaccumulation of harmful substances.

2.3. Fire and Explosion Risks

2.3.1. Human Health

- **Explosive Hazards:** Ammonia is flammable at high concentrations. The risk of explosion in case of leaks combined with an ignition source poses a significant threat to human safety.
- **Fire Safety Measures:** The documents do not provide comprehensive details on fire prevention and control measures, such as firebreaks, fire suppression systems, and community fire drills.

2.3.2. Animal Health

- **Wildlife Displacement:** Explosions and fires can destroy habitats and force wildlife to relocate, which can disrupt local ecosystems and lead to increased mortality rates.
- **Air Quality:** Fires resulting from ammonia leaks can release toxic fumes that degrade air quality, affecting both humans and animals in the vicinity.

2.4. Health Impact of Construction Activities

2.4.1. Human Health

- **Noise Pollution:** Construction activities will generate significant noise, potentially causing hearing loss, stress, and sleep disturbances for nearby residents.
- **Dust and Particulate Matter:** Dust generated during construction can lead to respiratory issues, particularly for vulnerable populations such as children and the elderly.

2.4.2. Animal Health

- **Disturbance to Wildlife:** Construction noise and activity can disturb local wildlife, disrupting feeding, breeding, and migration patterns.
- **Habitat Destruction:** The construction process can lead to the destruction of habitats, negatively impacting local biodiversity.

3. Recommendations for Addressing Safety and Health Concerns

3.1. Enhanced Monitoring and Real-Time Alerts

- **Air Quality Monitoring:** Implement continuous air quality monitoring systems around the ammonia terminal and pipeline routes to detect ammonia leaks promptly.
- **Health Surveillance:** Regular health check-ups and monitoring for workers and nearby residents to detect early signs of ammonia exposure.

3.2. Comprehensive Emergency Response Plan

- **Evacuation Plans:** Develop and communicate detailed evacuation plans for all nearby communities, including regular drills.
- **Emergency Training:** Conduct regular training sessions for local emergency response teams, focusing on handling ammonia leaks and associated hazards.

3.3. Wildlife Protection Measures

- **Habitat Conservation:** Implement measures to protect and restore habitats affected by construction and operation activities.
- **Impact Mitigation:** Develop strategies to minimize the impact of noise, dust, and other disturbances on local wildlife.

3.4. Community Engagement and Education

- **Public Awareness Campaigns:** Conduct educational campaigns to inform the community about the potential risks and safety measures related to the ammonia terminal.
- **Stakeholder Involvement:** Ensure ongoing dialogue with local communities, environmental groups, and other stakeholders to address concerns and incorporate feedback into project planning.

4. Conclusion

While the provided documents address many risks associated with the proposed ammonia terminal project, there are significant safety and health issues that require further attention. By enhancing monitoring, improving emergency response plans, protecting wildlife, and engaging with the community, the project can better safeguard human and animal health and ensure a more comprehensive risk management strategy.

This document can serve as a basis for further discussions with stakeholders and authorities to ensure that all potential safety and health risks are comprehensively addressed.