

COMMENTS RECEIVED

From Ruth Ndevahoma <ndevahoma@rtc.org.na>
To carien@greenearthnamibia.com
Subject Read: Background Information Document for the transportation of hazardous goods in Namibia for Bulk Haulage Logistics (Pty) Ltd

Sent Mon 12/01/2026 3:55 pm

Your message

To: Ruth Ndevahoma
Subject: Background Information Document for the transportation of hazardous goods in Namibia for Bulk Haulage Logistics (Pty) Ltd
Sent: Monday, 12 January 2026 15:37:07 (UTC+02:00) Windhoek
was read on Monday, 12 January 2026 15:54:16 (UTC+02:00) Windhoek.

Read: Background Information Document for the transportation of hazardous goods in Namibia for Bulk Haulage Logistics (Pty) Ltd
Chrystal Damases <cso@otavitown.org.na>

Sent Mon 12/01/2026 4:04 pm

To

Your message

To: Chrystal Damases
Subject: Background Information Document for the transportation of hazardous goods in Namibia for Bulk Haulage Logistics (Pty) Ltd
Sent: Monday, January 12, 2026 3:37:07 PM (UTC+02:00) Harare, Pretoria

was read on Monday, January 12, 2026 4:03:03 PM (UTC+02:00) Harare, Pretoria.

Read: Background Information Document for the transportation of hazardous goods in Namibia for Bulk Haulage Logistics (Pty) Ltd
Krischka Nadia Stoffels <kstoffels@walvisbaycc.org.na>

Sent Mon 12/01/2026 4:37 pm

To

Your message

To: Krischka Nadia Stoffels
Subject: Background Information Document for the transportation of hazardous goods in Namibia for Bulk Haulage Logistics (Pty) Ltd
Sent: Monday, January 12, 2026 3:37:07 PM (UTC+02:00) Windhoek

was read on Monday, January 12, 2026 4:36:14 PM (UTC+02:00) Windhoek.

Read: Background Information Document for the transportation of hazardous goods in Namibia for Bulk Haulage Logistics (Pty) Ltd
Olivia Mwanyekange <mwanyekangeo@rtc.org.na>

Sent Tue 13/01/2026 12:10 am

To

Your message

To: Olivia Mwanyekange
Subject: Background Information Document for the transportation of hazardous goods in Namibia for Bulk Haulage Logistics (Pty) Ltd
Sent: Monday, 12 January 2026 15:37:07 (UTC+02:00) Windhoek

was read on Tuesday, 13 January 2026 00:09:47 (UTC+02:00) Windhoek.

Read: Background Information Document for the transportation of hazardous goods in Namibia for Bulk Haulage Logistics (Pty) Ltd

Annalize Swart <aswart@swkmun.com.na>

Sent Tue 13/01/2026 7:38 am

To

Your message

To: Annalize Swart

Subject: Background Information Document for the transportation of hazardous goods in Namibia for Bulk Haulage Logistics (Pty) Ltd

Sent: Monday, January 12, 2026 3:37:07 PM (UTC+02:00) Harare, Pretoria

was read on Tuesday, January 13, 2026 7:35:28 AM (UTC+02:00) Harare, Pretoria.

RE: Background Information Document for the transportation of hazardous goods in Namibia for Bulk Haulage Logistics (Pty) Ltd

AS

Annalize Swart <aswart@swkmun.com.na>

To carien@greenearthnamibia.com

 Reply  Reply All  Forward  ...

Tue 13/01/2026 7:39 am

Dear Sir/Madam

We acknowledge receipt of your correspondence.

We would like to confirm that the contents of your correspondence have been received and will be escalated to the relevant department/section in Council who will review the content and process it in terms of Council's administrative operating procedures. Every effort will be attended to address the matter and to respond to you in a timely manner. Our officials will attempt to ensure that all aspects are thoroughly addressed.

Sincerely,

Annalize Swart

Executive Assistant to the Chief Executive Officer

Tel: +264 64 410 4100 Email: aswart@swkmun.com.na

Cell: +264 81140 6702 Address: cnr Rakotoka Street & Daniel Kamho Avenue
Swakopmund, Erongo



swkmun@swkmun.com.na
www.swkmun.com.na



Return Receipt (read): Background Information Document for the transportation of hazardous goods in Namibia for Bulk Haulage Logistics (Pty) Ltd

Gobabis Municipality <info@gobabis.org>

Sent Tue 13/01/2026 9:02 am

To

This is a Return Receipt for your message

To: "Charlie Du Toit" <charlie@greenearthnamibia.com>

Subject: Background Information Document for the transportation of hazardous goods in Namibia for Bulk Haulage Logistics (Pty) Ltd

Date: 2026-01-12 15:37

Note: This receipt only acknowledges that the message was displayed on the recipient's computer. There is no guarantee that the recipient has read or understood the message contents.

Re: Background Information Document for the transportation of hazardous goods in Namibia for Bulk Haulage Logistics (Pty) Ltd

UK

Usuta Kandovazu <changamundia@gmail.com>

To carien@greenearthnamibia.com

Cc Charlie Du Toit

 Reply  Reply All  Forward  ...

Tue 13/01/2026 4:36 am

Good day

Well received, I will participate, and share with other stakeholders, thanks.

Kind regards

On Mon, 12 Jan 2026, 3:37 PM , <carien@greenearthnamibia.com> wrote:

Read: Background Information Document for the transportation of hazardous goods in Namibia for Bulk Haulage Logistics (Pty) Ltd

WE Windhoek Explosives <WindhoekExplosives@nampol.na>
To carien@greenearthnamibia.com

Reply All Forward ...
Tue 13/01/2026 2:54 pm

Read: Background Information Document for the transportation of hazardou... (9.54 KB) Outlook item

"The information contained in this e-mail is confidential and may be subject to legal privilege and/or the subject of copyright. If you are not the intended recipient, you must not use, copy, distribute or disclose the e-mail or any part of its contents or take any action in reliance on it. If you have received this e-mail in error, please e-mail the sender by replying to this message. The Government of the Republic of Namibia shall not be held liable for any damages so caused to the unintended recipient and any unauthorized distribution by the unintended recipient. Any views expressed in this message are those of the individual sender, except where the sender expressly, and with authority, states them to be the views of Government of the Republic of Namibia. Although this email has been checked for viruses and other defects, no responsibility can be accepted for any loss or damage arising from its receipt or use".

Read: Background Information Document for the transportation of hazardous goods in Namibia for Bulk Haulage Logistics (Pty) Ltd

Trevor Ndjadila (Namport) <t.ndjadila@namport.com.na>

Sent Tue 13/01/2026 3:49 pm
To

Your message

To: Trevor Ndjadila (Namport)
Subject: Background Information Document for the transportation of hazardous goods in Namibia for Bulk Haulage Logistics (Pty) Ltd
Sent: Monday, 12 January 2026 3:37:07 PM (UTC+02:00) Harare, Pretoria

was read on Tuesday, 13 January 2026 3:48:42 PM (UTC+02:00) Harare, Pretoria.

Read: Background Information Document for the transportation of hazardous goods in Namibia for Bulk Haulage Logistics (Pty) Ltd

Johannes Kaiyamo <jkaiyamo@walvisbaycc.org.na>

Sent Tue 13/01/2026 4:48 pm
To

Your message

To: Johannes Kaiyamo
Subject: Background Information Document for the transportation of hazardous goods in Namibia for Bulk Haulage Logistics (Pty) Ltd
Sent: Monday, January 12, 2026 3:37:07 PM (UTC+02:00) Windhoek

was read on Tuesday, January 13, 2026 4:48:05 PM (UTC+02:00) Windhoek.

Read: Background Information Document for the transportation of hazardous goods in Namibia for Bulk Haulage Logistics (Pty) Ltd

David Uushona <duushona@walvisbaycc.org.na>

Sent Tue 13/01/2026 9:02 pm
To

Your message

To: David Uushona
Subject: Background Information Document for the transportation of hazardous goods in Namibia for Bulk Haulage Logistics (Pty) Ltd
Sent: Monday, January 12, 2026 3:37:07 PM (UTC+02:00) Harare, Pretoria

was read on Tuesday, January 13, 2026 9:01:56 PM (UTC+02:00) Harare, Pretoria.

Read: Background Information Document for the transportation of hazardous goods in Namibia for Bulk Haulage Logistics (Pty) Ltd

Freddy Cloete <fcloete@walvisbaycc.org.na>

Sent Wed 14/01/2026 7:59 am
To

Your message

To: Freddy Cloete
Subject: Background Information Document for the transportation of hazardous goods in Namibia for Bulk Haulage Logistics (Pty) Ltd
Sent: Monday, January 12, 2026 3:37:07 PM (UTC+02:00) Windhoek

was read on Wednesday, January 14, 2026 7:58:35 AM (UTC+02:00) Windhoek.

Read: Background Information Document for the transportation of hazardous goods in Namibia for Bulk Haulage Logistics (Pty) Ltd

Mapenzie Festus (Namport) <m.festus@namport.com.na>

Sent Thu 15/01/2026 10:25 am

To

Your message

To: Mapenzie Festus (Namport)

Subject: Background Information Document for the transportation of hazardous goods in Namibia for Bulk Haulage Logistics (Pty) Ltd

Sent: Monday, January 12, 2026 3:37:07 PM (UTC+02:00) Windhoek

was read on Thursday, January 15, 2026 10:24:18 AM (UTC+02:00) Windhoek.

Mapenzie Festus (Namport) Business Development Specialist

Tel: [+264 208 2225](tel:+2642082225)

Mobile: [+264 81 151 4555](tel:+264811514555)

m.festus@namport.com.na

No.17, Rikumbi Kandanga Rd

P.O. Box 361 Walvis Bay

Namibia

Read: Background Information Document for the transportation of hazardous goods in Namibia for Bulk Haulage Logistics (Pty) Ltd

Athea Muller <amuller@walvisbaycc.org.na>

Sent Fri 16/01/2026 12:06 pm

To

Your message

To: Athea Muller

Subject: Background Information Document for the transportation of hazardous goods in Namibia for Bulk Haulage Logistics (Pty) Ltd

Sent: Monday, January 12, 2026 3:37:07 PM (UTC+02:00) Windhoek

was read on Friday, January 16, 2026 12:05:36 PM (UTC+02:00) Windhoek.

Fwd: Queries and inputs to the BHL project



Usuta Kandovazu <changamundia@gmail.com>

To: careen@greenearthnamibia.com

Cc: upindia@gmail.com

ⓘ You forwarded this message on 16/01/2026 12:49 pm.

Reply

Reply All

Forward



Thu 15/01/2026 5:39 pm

Good day sir, my sincere greetings and compliments for the new season.

Your inputs are highly appreciated and valued.

In here copied in this email co-ordinates the study.

On the attached document shared with you, include are response/ comment sheet, where your required to sign.

However, I will come collect the comment sheet next week, I will be at the border.

Thanks

Kind regards

Buitepos Local Authority Area

----- Forwarded message -----

From: Absalom upindia <upindia@gmail.com>

Date: Thu, 15 Jan 2026, 10:36 AM

Subject: Queries and inputs to the BHL project

To: changamundia@gmail.com <changamundia@gmail.com>

Greetings Mr. Changa

These are my 5 questions

1 What are the emergency response procedures for accidents, spills, or fires involving hazardous items at or near the Buitepos border crossing?

2 Which local agencies or services (e.g., police, customs, health services) will be in charge of first response in the event of an incident at Buitepos, and are they appropriately equipped?

3 What measures will be implemented to prevent contamination of soil and groundwater in the Buitepos area in the event of a spill or leak?

4 How will Buitepos inhabitants and personnel be kept informed of accidents, dangers, and safety measures involving hazardous goods transportation?

and here are my recommendations

I propose that a site-specific emergency response plan for Buitepos be created and distributed to border officers, inhabitants, and relevant agencies.

I recommend that a designated safe parking or holding space for hazardous commodities trucks be established at Buitepos, away from residential and office areas.

I advise that residents and personnel at Buitepos have regular communication and information exchange about hazardous commodities movements and safety practices.

While the Background Information Document provides a broad overview of the proposed project, the Environmental Impact Assessment and Environmental Management Plan are insufficiently detailed, particularly in terms of site-specific risks, emergency response measures, and mitigation strategies for the Buitepos border post and surrounding residential areas. More precise, location-specific information is required to allow meaningful public participation."

--

Kind Regards

Absalom Uupindi

+264812228346

Read: Background Information Document for the transportation of hazardous goods in Namibia for Bulk Haulage Logistics (Pty) Ltd
Gabriella Hiiko <ghiiko@walvisbaycc.org.na>

Sent Mon 19/01/2026 11:34 am

To

Your message

To: Gabriella Hiiko

Subject: Background Information Document for the transportation of hazardous goods in Namibia for Bulk Haulage Logistics (Pty) Ltd

Sent: Monday, January 12, 2026 3:37:07 PM (UTC+02:00) Windhoek

was read on Monday, January 19, 2026 11:34:04 AM (UTC+02:00) Windhoek.

Read: Background Information Document for the transportation of hazardous goods in Namibia for Bulk Haulage Logistics (Pty) Ltd

David Shikoyeni <technical@utc.com.na>

Sent Tue 20/01/2026 12:07 pm

To

Your message

To: 'Charlie Du Toit'

Subject: Background Information Document for the transportation of hazardous goods in Namibia for Bulk Haulage Logistics (Pty) Ltd

Sent: 2026/01/12 15:37

was read on 2026/01/20 11:32.

FW: OBJECTION SUBMISSION TRANSNAMIB - HARZARDOUS GOODS



Charlie Du Toit <charlie@greenearthnamibia.com>
To: carien@greenearthnamibia.com

i This message was sent with High importance.



OBJECTION SUBMISSION HARZARDOUS GOODS - TRANSNAMIB HOLDINGS LTD.pdf
1 MB

↳ Reply ✉ Reply All ↗ Forward ...

Tue 20/01/2026 10:42 am

From: Doris Lamperth <Doris.Lamperth@transnamib.com.na>
Sent: Tuesday, January 20, 2026 10:34 AM
To: charlie@greenearthnamibia.com
Cc: Desmond E. Van Jaarsveld <Desmond.VanJaarsveld@transnamib.com.na>; Jonas Sheelongo <Jonas.Sheelongo@mwt.gov.na>; tijivkuam@ra.org.na
Subject: OBJECTION SUBMISSION TRANSNAMIB - HARZARDOUS GOODS
Importance: High

Dear Messrs Du Toit and Van Der Walt,

Attached please find Objection Submission for your attention from Trans Namib.

Will you please acknowledge receipt?

Trust this finds you well.

Regards,

Doris Lamperth
Executive Assistant to the CEO

Tel: +264 819582013; Mobile +264 81 122 8634 |doris.lamperth@transnamib.com.na | www.transnamib.com.na



Feedback on the transport of hazardous



Gobabis Municipality <info@gobabis.org>
To: carien@greenearthnamibia.com
Cc: Cleophaskaapirua

i You replied to this message on 21/01/2026 9:07 am.
We removed extra line breaks from this message.



2026012107501493.pdf
434 KB

↳ Reply ✉ Reply All ↗ Forward ...

Wed 21/01/2026 8:49 am

Good morning, Madam

I trust this email finds you well. Kindly find attached a letter for your attention.

--

Regards

Mrs. Jenny Mujazu Uamunika
Gobabis Municipality
Customer Care Agent
Tel : (264) 62577300
Fax : (264) 62563012
info@gobabis.org

From: Richard Tibinyane <tibinyaner2@gmail.com>
Sent: Saturday, January 24, 2026 10:57 PM
To: charlie@greenearthnamibia.com

Subject: BID for BHL Group

Good evening,

Please see attachment for your perusal.

Regards,
Richard Tibinyane

COMMENTS FROM INTERESTED AND AFFECTED PARTIES

PERSONAL PARTICULARS

Name and name: Richard Arthur Tibinyane
Su

Organization: Road Fund Administration
on:

Postal Address: P.O Box 24169 Windhoek

Address:

Telephone number: Email Address:

Nu 062 560487 tibinyaner2@gmail.com

Fax Number: Cellphone Number: 0816448417

INTEREST IN PROJECT

I am interested in my personal capacity as a transport management, logistics and supply chain management scholar with over a decade professional experience in transportation overload control, regulatory services, abnormal loads and road user charging systems.

COMMENTS ON PROJECT

This is a great opportunity for Namibia to learn from and implement international best practices and standards in safety and environmental management during the handling, storage and transportation of hazardous and/or dangerous substances or goods within Namibia and through ports of entry.

Signature:



Date:

24.01.2026

Kindly take note that comments should reach our office by 26 January 2026.



MUNICIPALITY OF GOBABIS

Please address all correspondence to the Chief Executive Officer

35 Church Street, P.O. Box 33, Gobabis, Namibia

Head Office : Tel No. : (09 264 62) 577 300 *Fax No. : (09 264 62) 563012*

Web Address: www.gobabis.org *e-mail address : info@gobabis.org*

Enquiries: Mr. C. Kauapirura

Our Ref. No: 17 / 6 / P

Date: 21 January 2026

Mrs. Carien Van der Walt
P.O. Box 6871
Ausspannplatz
WINDHOEK

Email: carien@greenearthnamibia.com
Cell: 081 471 8073

Dear Carien,

FEEDBACK ON THE TRANSPORTATION OF HAZARDOUS GOODS THROUGH GOBABIS

Your request on the above captured bears reference.

This office would like to provide feedback regarding the transportation of hazardous substances through Gobabis by Bulk Haulage Logistics (Pty) Ltd.

The Gobabis Municipality currently does not have the capacity to respond adequately to all potential spillage or leakage scenarios, nor do we have secure parking facilities for vehicles transporting hazardous substances. Repeated minor spills or chronic emissions may result in long-term soil and water contamination, biodiversity loss, and disruption of ecosystem services.

Exposure to hazardous substances can lead to acute poisoning, respiratory complications, and long-term health effects. Considering these risks, the Gobabis Municipality will not permit trucks transporting hazardous substances to park or overnight within the town boundary. Such vehicles will only be allowed to pass through Trans Kalahari Bypass (B6) road.

If an emergency stop becomes unavoidable, we request early communication from your organisation.

We further recommend that your company implement clear communication protocols, including timely incident reporting, to ensure effective coordination and response.

We appreciate your cooperation in ensuring the safety of our community and environment.

Yours sincerely,

F.M. SHIMAKELENI (Mrs.)
acting CHIEF EXECUTIVE OFFICER

MUNICIPALITY OF GOBABIS
P.O. Box 33, GOBABIS, Namibia
Tel: +264-62-577300

21 JAN 2026
CHIEF EXECUTIVE OFFICER

COMMENTS FROM INTERESTED AND AFFECTED PARTIES

PERSONAL PARTICULARS	
Name and Surname: Desmond van Jaarsveld	
Organization: TransNamib Holdings Limited	
Postal Address: Private Bag 13204, Windhoek, Namibia	
Telephone Number:	Email Address:
081 9582 013	desmond.vanjaarsveld@transnamib.com.na
Fax Number: n/a	Cellphone Number.: 081 165 1200

INTEREST IN PROJECT

TransNamib is the national rail operator.

COMMENTS ON PROJECT

See attached submission

Signature:		Date:	20/01/2026
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Kindly take note that comments should reach our office by 26 January 2026.



transnamib

OBJECTION SUBMISSION: TRANSNAMIB HOLDINGS LTD

RE: ENVIRONMENTAL IMPACT ASSESSMENT FOR TRANSPORTATION OF HAZARDOUS GOODS BY BULK HAULAGE LOGISTICS (PTY) LTD

SUBMISSION DEADLINE: 26 JANUARY 2026

1. Introduction

TransNamib Holdings Ltd, Namibia's national rail operator and a key custodian of the country's integrated transport infrastructure and safety, hereby submits this formal objection to the proposed Environmental Clearance Certificate for Bulk Haulage Logistics (Pty) Ltd (BHL) to transport hazardous goods, primarily Ammonium Nitrate (UN 1942/2067), by road across Namibia.

Our objection is founded on irreconcilable risks to public safety, environmental integrity, and national infrastructure, and advocates for the mandatory use of rail transport for bulk hazardous materials as a safer, more sustainable alternative aligned with national policy and international best practice.

2. Objection Based on Scale and Exposure Risk to Namibian Communities

The proposed road routes expose Namibian populations and sensitive environments to extreme risk over unacceptable distances. Based on the routes outlined in the BID (Section 2.3):

- **Route 1 (Walvis Bay to Katima Mulilo/Zambia):** Approximately 1,400 km. This route traverses Swakopmund, Usakos, Otavi, Tsumeb, Grootfontein, Rundu, and numerous villages before reaching Kongola and Katima Mulilo. It passes adjacent to the Etosha National Park watershed areas and through multiple communal conservancies.
- **Route 2 (Walvis Bay to Buitepos/Botswana):** Approximately 1,000 km. This route passes through Okahandja, Windhoek (the national capital), Gobabis, and surrounding settlements.
- **Route 3 (Walvis Bay to Ariamsvlei/South Africa):** Approximately 900 km. This route traverses Rehoboth, Mariental, Keetmanshoop, and Karasburg.

TransNamib Building,
16 Prof. Mburumba Kerina Street

Private Bag 13204,
Windhoek, Namibia

Tel: +264 81 958 2070
(insert your email here)

Board of Directors: Ms. G. Michaels (Deputy Chairperson) Mr. P. Ndeunyema, Dr. J.P.B. Keyser, Mr. V. Kavari, Mr. F. Uugwanga
Mr. D. Van Jaarsveld (Chief Executive Officer), Ms. H. Haludilu (Company Secretary)
Company Registration No.: 99/314



Cumulatively, these operations propose moving up to 4,000 MT of Ammonium Nitrate monthly along roads that pass through or near every major population center and several critical environmental zones in Namibia, totalling thousands of kilometer-risks per month. The BID's risk assessment fails to adequately quantify this cumulative, nation-wide exposure.

3. Legal and Policy Framework Contraventions

The proposed road-based solution contradicts several pillars of Namibian law and policy:

- **Namibia's Logistics Master Plan (2018) and Harambee Prosperity Plan II:** These strategic documents explicitly prioritize rail for bulk and hazardous cargo to reduce road damage, improve safety, and increase cost-effectiveness. Approving this application undermines these national strategic objectives.
- **Environmental Management Act (No. 7 of 2007), Section 2 (Principles):** The proposal violates the precautionary principle. When faced with potential catastrophic risks (explosions, mass contamination), the absence of **certain scientific certainty** must not be used to postpone cost-effective measures to prevent environmental degradation. Rail transport is a proven, safer alternative.
- **SADC Regional Guidelines on Hazardous Goods Transport:** These guidelines encourage member states to utilize the **safest practicable mode**. For bulk quantities over long distances, rail is internationally recognized as the safest practicable mode, with a dramatically lower accident rate per ton-kilometer compared to road.

4. Inadequate Risk Mitigation & Historical Precedent

The mitigation measures listed in Table 2 of the BID are standard procedural controls for road transport and are **grossly insufficient** for the specific, high-consequence risk posed by Ammonium Nitrate.

- **Historical Incidents:**

- **Beirut, Lebanon (2020):** 2,750 tons of Ammonium Nitrate improperly stored caused a catastrophic explosion, killing 218+, injuring 7,000+, and causing \$15bn in damage. This demonstrates the catastrophic potential of the material BHL proposes to move in similar quantities **through our towns monthly**.
- **Texas, USA (2013):** A road truck carrying Ammonium Nitrate exploded, killing 15 and levelling a community. This demonstrates the specific road-transport risk.
- **Local Context:** Namibia's road accident fatality rate is high. Introducing high-volumes of explosive materials onto these same roads, subject to driver fatigue, wildlife collisions, and varying road conditions, is an unacceptable gamble with public safety.

- **Inadequate Mitigation:** GPS tracking and spill kits are **response tools**, not **prevention tools**. They do not prevent a catastrophic collision. The BID admits the risk of "vehicle collisions" but offers no solution beyond driver training and speed limits - measures with known high rates of human error.

5. The Safe, Compliant, and Strategic Alternative: Rail Transport

TransNamib possesses the capability and infrastructure to transport hazardous goods safely on the Walvis Bay to the last mile where railway ends in the all three routes of concerns.

- **Safety:** Rail transport of hazardous materials is conducted in dedicated, secure wagons, operated by highly trained personnel, on a controlled right-of-way separate from public traffic, eliminating the risk of cross-traffic collisions.
- **Environmental Protection:** Rail is a lower-emission mode of transport (one engine responsible to carry many tones of Ammonium Nitrate) as opposed to multiple trucks on public roads, reducing the carbon footprint and localized air pollution cited in the BID. It also minimizes the risk of spills into sensitive ecosystems along the route, as the rail line has defined, managed corridors.
- **Economic and Infrastructure Protection:** Heavy haulage of dense cargo like Ammonium Nitrate accelerates the deterioration of national road infrastructure, imposing massive future maintenance costs on the state. Rail is designed for such loads.

6. Conclusion and Demand

The Background Information Document presents a plan that externalizes extreme risk onto the Namibian public and environment for commercial convenience, while a demonstrably safer, more sustainable, and policy-compliant alternative exists.

TransNamib therefore **OBJECTS** in the strongest possible terms to the issuance of an Environmental Clearance Certificate for the road-based transport of hazardous goods as proposed by BHL.

We demand that the Environmental Commissioner:

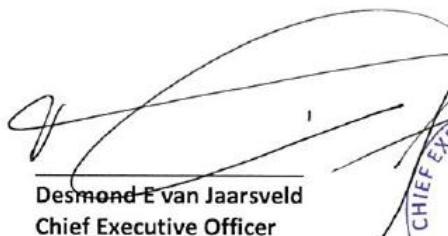
1. **Reject** this application for an Environmental Clearance Certificate.
2. **Mandate** that the proponent, BHL, in collaboration with TransNamib, develop a proposal for the transportation of hazardous goods primarily via rail, with road

transport limited to the absolute final leg where no rail sidings exist, under strict, supervised conditions.

3. **Require** a new, comprehensive EIA that properly assesses the cumulative risk of the proposed volumes and compares the rail alternative as the baseline scenario.

The safety of Namibian citizens, the protection of our environment, and the integrity of our national strategy are not negotiable.

Submitted for and on behalf of TransNamib Holdings Limited.



Desmond E van Jaarsveld
Chief Executive Officer
TransNamib Holdings Limited



CHIEF EXECUTIVE OFFICER
2026-01-20
TRANSNAMIB HOLDINGS LIMITED

Date: 16 January 2026

cc: Mr. Jonas Sheelongo, Executive Director - Minister of Works and Transport
Mr. Hippy Tjivikua, CEO – Roads Authority