

APP-007006

**PHASE 2 LAND RECLAMATION AND EXPANSION OF THE
PORT OF LÜDERITZ IN ROBERT HARBOUR, LÜDERITZ,
||KHARAS REGION**

Representations, Objections and Comments



February 2026

Comments and Responses Table

E-Mail Correspondence Received

Note: E-mails received solely for the purpose of registration as an I&AP are not included in the comments and responses table. Comments are presented as received with no changes in typing or related errors. Only correspondence and comments directly related to the Phase 2 expansion project are presented. Contact details are redacted for privacy reasons.

Comments	Response
From: Dr J Kemper Date: 19 August 2025	
<p>In particular, I am concerned about potential environmental impacts during the construction activities of both phases - especially if dredging and/or blasting is envisaged, and how associated noise (especially during blasting) could affect birds nesting on the two harbour islands (Penguin and Seal islands). Dredging harbour muds which probably contain elevated levels of heavy metals (and possibly of chemicals like anti-fouling agents etc), are likely to affect the mariculture ventures nearby, as well as the natural benthic biota associated with the shoreline and the two islands. This, in turn, could affect organisms that feed on these, including other invertebrates, but also higher trophic levels such as waders and oystercatchers. Other potential pollution sources, especially during construction activities, could include plastic/rubbish, oil, cement (and possibly others) that may affect both mariculture and the natural environment downstream.</p> <p>I assume that you will have a specialist assessing the risk that any pollutants that may be released during the construction/reclamation phases may pose, and also trust that there are practical mitigation measures that can be applied to minimise the risk to mariculture and to the natural environment, including the two harbour islands. I hope that there is already a long-term baseline study in place that monitors pollution levels in the existing port, including from manganese and lead loading activities that you could draw on, as well as any baseline studies on heavy metal accumulation in shellfish in the port area (compared to "control" areas outside the port area).</p>	<p>No blasting will be conducted for this project. Dredging will be conducted in line with the existing EIA and EMP for dredging in the Port of Lüderitz. This includes real-time monitoring for increased turbidity and pausing of dredging activities if suspension of sediments exceeds set limits. Long term baselines on water and sediment contamination levels are not available, but with previous dredging exercises, baselines were determined as presented in section Error! Reference source not found.. Dredging of these seabed sediments in the form of periodic maintenance dredging have been ongoing in this area of the port for as long as the port existed to date, on a 5 to 10 year cycle and has been occurring without any issues and in harmony with the existing mariculture industry.</p>
From: Lazarus Kairabeb (Nama Traditional Leaders Association) Date: 26 August 2025	
<p>Nama Traditional Leaders Association, herewith put to record that we are an interested party having historical ties with not only the park but Shark Island itself and all areas where mass graves are identified through archaeological site discovery. Please contact Mabos Ortman.</p>	<p>Noted</p>
From: Manfred Anderson Date: 01 September 2025	
<p>Thanks for your reply and prospective registration as an I&AP. I will study the in attached bids received and will soon file some input as I&AP.</p> <p>Looking forward to some positive intervention in these worthwhile projects.</p>	<p>Noted</p>
From: Fritz A Katjiruru (Ovaherero Traditional Authority) Date: 02 October 2025	
<p>Your email is well received and forwarded to the relevant office for a reply.</p>	<p>Noted</p>

Comments	Response
<p>From: Lenishwa Engelbrecht Date: 02 October 2025</p>	
<p>Thank you for your invitation to NHC to participate in the public consultation process for the Environmental Impact Assessment Study for the Port of Lüderitz / Robert Harbour Expansion, scheduled for 3 October in Lüderitz.</p> <p>Unfortunately, due to a high volume of pre-scheduled and prioritized commitments during this period, and with our limited capacity, NHC will not be able to attend the meeting. Please accept my sincere apologies for the delayed response.</p> <p>We remain interested in the project and its outcomes, and we would appreciate receiving any materials (minutes, reports, presentations) that emerge from the consultation process. Should there be another opportunity for engagement at a later date, please do not hesitate to invite us.</p> <p>Thank you for your understanding.</p>	<p>Noted</p>
<p>From: Daniel T Frederick (Manfred Anderson in Copy) Date: 25 September 2025</p>	
<p>I wish to register as an interested and affected member of the community in //Kharas Region.</p> <p>Kindly afford me the opportunity to be part of this meeting.</p> <p>Trust that you would not panelize me for late registration. I live in Keetmanshoop and would make the efforts to travel and attend.</p>	<p>Thank you for your mail and I will definitely register you for the project. You are also more than welcome at the meeting.</p> <p>Looking forward to seeing you there.</p>
<p>From: Manfred Anderson (Daniel T Frederick in Copy) Date: 06 October 2025</p>	
<p>Kindly let me know the date of the meeting and when submissions will be closing.</p>	<p>The meetings were unfortunately already finalized last week and over the weekend. You are however still welcome to send comments/questions. I would like to finalise the report by latest next week.</p>
<p>From: Daniel T Frederick (Manfred Anderson in Copy) Date: 06 October 2025</p>	
<p>This is very much unfortunate as I regarded the meeting as a platform for engagement on issues that are seriously overlooked and in our opinion excluding those who matter and also being denied to be heard.</p> <p>I definitely am definitely disappointed.</p>	<p>It was my impression from your original email, included in the below email trail, that you are aware of the meeting details and the misunderstanding is very unfortunate. I can however guarantee you that we are not excluding anyone or denying anyone to be heard. That is why I have specifically notified, among others, the !Aman TA, the NTLA and the OTA of the environmental assessment process and the meeting details. Once I have finalized the minutes of the meetings, I will circulate it to all registered interested and affected parties. You are then welcome to submit to me, any other aspects that you feel were not addressed, and I can promise you that we will take it into consideration and engage with you further, should</p>

Comments	Response
	<p>there be a need. All reports produced during the assessment process will also be shared for your review and comment.</p> <p>I trust that we can still engage in a fruitful manner to hear and address your comments and concerns.</p>
<p>From: Daniel T Frederick (Manfred Anderson in Copy) Date: 07 October 2025</p>	
<p>Thank you for your consideration and encouraging. I surely would be happy to receive the minutes. I will definitely have input or comments.</p>	<p>Noted</p>



!AMAN TRADITIONAL AUTHORITY

P.O.BOX 135, Bethanie Namibia:

Tel: 264 63 283 059 / 081 630 6921

amanauthority@gmail.com

October 03, 2025

!Aman Traditional Authority
P.O. Box 135
Bethanie, Namibia
03rd October 2025

To: Dr. André Faul
Conservation Ecologist
Geo Pollution Technologies (Pty) Ltd

Subject: Input on the Environmental Impact Assessment Study for the Proposed Port of Lüderitz Robert Harbour Expansion Project

Dear Dr. Faul,

On behalf of the !Aman Traditional Authority, we wish to thank you for the invitation to participate in the Public Consultation Process for the Environmental Impact Assessment (EIA) study of the proposed Port of Lüderitz Robert Harbour Expansion Project. We acknowledge the importance of this process in ensuring that environmental, social, and cultural factors are thoroughly considered.

The !Aman Traditional Authority recognizes the potential benefits of the proposed project, including economic development and job creation. At the same time, we respectfully submit the following input for consideration:

Environmental Concerns:

Protection of **marine biodiversity and coastal ecosystems** during construction and operation.

Measures to mitigate **noise, dust, and water pollution**, which could affect surrounding communities and natural habitats.

Proper **waste management** strategies to prevent contamination of land and water.

Social and Community Considerations:

Potential impacts on **livelihoods of local communities**, particularly those involved in fishing and small-scale commerce.

Effects on **traffic, safety, and public infrastructure**, which may increase with expanded port operations.

Strategies to ensure that **local communities benefit equitably** from employment and economic opportunities created by the project.

Cultural and Heritage Preservation:

Safeguarding of **historical, archaeological, and underwater heritage sites**, ensuring that no culturally significant areas are adversely affected.

Consultation with Traditional Authorities and local communities regarding **sites of spiritual or cultural importance**.

Recommendations:

Implementation of robust **monitoring and mitigation plans** throughout the project lifecycle.

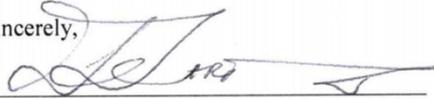
Active engagement with the !Aman Traditional Authority and local communities during both construction and operation phases.

Consideration of **project alternatives** that minimize environmental and cultural impacts while maximizing benefits for the local population.

We appreciate the opportunity to provide input and look forward to participating in the upcoming consultation meeting on 03 October 2025 at Turnhalle, Lüderitz.

Thank you for your consideration, and we trust that our concerns will be given due attention in the EIA process.

Yours sincerely,



Mr. Johannes Theofilus Swartz
For and on behalf of the !Aman Traditional Authority



Additional Communication

**THE APPROVAL PETITION FOR
THE !AMAN TRADITIONAL
AUTHORITY FOR THE EXPANSION OF
THE ROBERT HARBOUR IN LÜDERITZ
(!NAMI-#NUS)**

We, the undersigned, respectfully petition NAMPORT for the expansion of the Robert Harbour in LÜDERITZ (!Nami-#Nus). In reference to the engagement held on 08–11 July 2025, the !Aman Traditional Authority witnessed the investigation session carried out on Shark Island. Based on this background, we held clan meetings in Bethanie and Aus where the clan shared the same sentiments with the affected communities and gave us the authorization to approve the expansion of the Robert Harbour in LÜDERITZ (Shark Island).

The !Aman Traditional Authority would like to sincerely apologize if this peaceful demonstration appears as though we do not consider the significance and importance of the foundation of this land and the blood that was shed on this ground.

We stand together with NTTLA and OTA in acknowledging that the matter of the genocide which took place on this ground is not one we take lightly. On the contrary, we honor and respect the sacrifices that were made. The fight for this land during the genocide was a fight for our freedom, our prosperity, and for us as descendants to have land on which we can build a great and prosperous legacy in their honor.

We envision a nation that will make those who died for this cause proud—that they did not die in vain, that all the brutal deaths and murders they endured were not meaningless, but instead gave us the opportunity to live meaningfully on land that honors them.

The !Aman clan, the leaders of our Traditional Authority, and the community at large stand together in writing this petition as direct descendants of those who came before us—those who fought the good fight. We wish to honor this fight by making this soil productive, by unlocking the wealth that is locked up in their bones. The young people and the current generations no longer want to keep these bones silent, but instead ensure that everything

we do honors their hardships and gives glory to God Almighty, who ensured that we were not entirely wiped out, and that those who remained have the privilege to be alive and to continue the rich work entrusted to them. We cannot allow the land to remain idle.

Therefore, it is our mandate and responsibility as the affected descendants of the 1904–1908 Genocide to uplift the communities of LÜDERITZ, Aus, Bethanie, the ||Kharas Region, and Namibia at large. Furthermore, this expansion will create employment, study opportunities for both young and old, and increase the Gross Domestic Product of our economy, while also contributing positively to the international goals of sustainable development.

In conclusion, I wish to emphasize that the **!Aman Clan are the rightful custodians of this jurisdiction**, and as such, any development in this area must be carried out in full consultation with the **!Aman Traditional Authority**. Furthermore, I must underscore that the NTLA and OTA do **not** represent the !Aman Traditional Authority, nor do they speak on behalf of, or have the mandate of, the

affected descendants of the genocide massacre.

As **descendants of the 1904–1908 Genocide**, our collective desire is that **no one should feel excluded from the Namibian House**.

Recognition, inclusion, and justice must be extended to all, especially those whose histories carry deep scars and who continue to seek dignity and rightful representation.

I thank You

!Aman Traditional Authority backs Namport Lüderitz Port Expansion
(Robert Harbour)

APPROVE THE EXPANSION OF ROBERT HARBOUR



DATE: 29 AUG 2025
 ACTION: PETITION HAND-OVER TO INAMI=NUS CONSTITUENCY COUNCIL, HYPHEN ENERGY & NAMPORT
 PLACE: ROBERT HARBOUR (Next to Shark)

We authorise and support the expansion of the current Robert Harbour Port through quay wall expansion and land reclamation for the benefit of //Kharas communities, and the whole of Namibia.

!AMAN CLAN MEMBERS

NAME	SURNAME	CONTACT NO	SIGNATURE
1 HENRIK	FREDERIK	0	Privacy Block
2 JOHANNES I.	SWINDI	0	
3 CHRISTOF	BOOIS	03	
4 FREDRIK	NASSARUS	03	
5 ELITA	GIAMPOS	0	
6 Sanna	Boois	0	
7 Anna	Witbeep	0	
8 Ricardo (Korpet)	Koepel	03	
9 JACQUES	FREDERIK	03	
10 CHRISTOF	FREDERIK	03	
11 S. CHRISTOF	BOOIS	03	
12 JOHANNES	WITBEEP	0	
13 Rachel Fredrick	Fredrick C.	0	
14 David	Witbeep	0	
15 Edw ard	Witbeep	0	
16 Magretha	Van Kent	0	
17 Magdalena	BOOIS	0	
18 KATHINA	JAKUS	0	
19 LOUIS JAKUS	BOOIS	0	
20 David	Isaacks	0	
21 Babakla Hanse	Isaacks	0	
22 Kwana	Isaacks	0	
23 Andie	Isaacks	0	
24 Sofia	NASSARUS	0	
25 Sofia Fredrika	Hanse	0	
26 Gert	Isaacks	0	
27 Anna Maria Fredrika	Van der Merwe	0	
28 Elizabeth Vries	Isaacks	0	
29 Anna M.	Isaacks	0	
30 Maria	Carum	0	
31 Paul M.	Carum	0	
32 Maria Magdalena	Maphath	0	
33 Maria F.T.	Frederick's	0	
34 Hendrina	Isaacks	0	
35 Edlie	Vries	0	
36 Anastasia	Devoets	0	
37 Eusanna	Boois	0	
38 Maria	Frederick	0	
39 Lucia	Ngalundaa	0	
40 Elizabeth	J. Cloete	0	
41 Lisa Sina	Van der Merwe	0	
42 Luita	Boois	0	
43 Anna	Isaack	0	
44 Maria B. Frederik	Frederick	0	
45 Alyssa	Boois	0	
46 Maria	Isaacks	0	

