

# UPDATED ENVIRONMENTAL MANAGEMENT PLAN

**FOR THE RENEWAL OF THE ENVIRONMENTAL CLEARANCE CERTIFICATE OF  
THE  
EXISTING FUEL RETAIL FACILITY ON ERF 1159, ONETHINDI EXTENSION 1,  
ONIPA CONSTITUENCY, OSHIKOTO REGION.**



**FEBRUARY 2023**

<b>PREPARED BY:</b>	<b>PREPARED FOR:</b>
<b>NGHIVELWA PLANNING CONSULTANTS</b>	<b>SUPERIOR INVESTMENTS GROUP CC</b>
<b>P.O. BOX 40900</b>	<b>P. O. BOX 231</b>
<b>AUSSPANNPLATZ</b>	<b>OHANGWENA</b>
<b>CEL: +264 81 412 7359</b>	<b>CELL: +264 81 124 3699</b>
<b>E-MAIL: <a href="mailto:planning@nghivelwa.com.na">planning@nghivelwa.com.na</a></b>	<b>EMAIL: <a href="mailto:danielshindume@gmail.com">danielshindume@gmail.com</a></b>



### Environmental Practitioners

Name of representative of the EAP	Education qualifications	Professional affiliations
Nghivelwashisho Natangwe Ndakunda	MBA-Entrepreneurship, B-Tech Town and Regional Planning	Namibia Council of Town and Regional Planners
Ndati-Onawa N Ndakunda	Master of Science in Integrated Environmental Management and Sustainable Development, BSc (Honors) Geohydrology	Geoscience Council of Namibia, Environmental Scientist (EAPAN Member)

### Client

Name	Position/ Role	Address
Superior Investments Group CC	Superior Investments Group CC (Proponent)	P. O Box 231 Ohangwena

### LIST OF ABBREVIATIONS

TERM	DEFINITION
ECO	Environmental Control Officer
RoD.	Record of Decision
EO	Environmental Officer
RE	Resident Engineer
ELO	Environmental Liaison Officer
PPE	Personal Protective Equipment
EMP	Environmental Management Plan
EIA	Environmental Impact Assessment
USTs	Underground Storage Tanks

## INTRODUCTION AND BACKGROUND

Superior Investments Group CC currently operates a fuel retail facility on Erf 1159, Onethindi Extension 4, Oniipa Town, Oniipa Constituency, Oshikoto Region. It is the intention of the owners to renew the existing Environmental Clearance Certificate issued on the 3<sup>rd</sup> of July 2018. This will allow them to continue to supply fuel to the general public in and around Oniipa and Ondangwa Towns.

Nghivelwa Planning Consultants has been appointed to prepare and update the existing Environmental Management Plan (EMP) for the operation of a fuel retail facility on Erf 1159, Onethindi Extension 4, Oniipa Town. The updated Environmental Management Plan has been conducted to meet the requirements of Namibia's Environmental Management Act (No. 7 of 2007) and Petroleum Products and Energy Act (Act No. 13 of 1990).

The purpose of the EMP report is to proactively address potential problems during the operational phase of the fuel retail facility. This will ensure that damage to the environment during the operational phase is avoided and, mitigation measures to be implemented to minimize environmental degradation.

## PROJECT DESCRIPTION

The proposed activity involves the continued operation of a fuel retail facility that is situated on Erf 1159, Onethindi Extension 4, Oniipa Town, Oniipa Constituency, Oshikoto Region. The updated EMP is necessary to allow for the renewal of the Environmental Clearance Certificate that was issued for the construction and operation of a fuel retail facility on the same property. The site is situated along the B1 main road from Oniipa to Ondangwa and its GPS coordinates are: 606030.22 m E, 8018058.34 m S (17° 55.375'S; 16° 0.066'E).

Erf 1159, Onethindi Extension 4 is currently owned by Superior Investments Group CC who are the proponents. The Proponent intends to continue with the operation of the following activities;

- two underground storage tanks (fiber-reinforced resin coated steel tanks):
  - a) (i) One 46,000-litre capacity underground fuel storage tanks for unleaded petrol
  - b) (ii) One 46,000-litre capacity underground fuel storage tank for 500ppm diesel
  - c) 6 pump islands
  - d) Fire protection equipment as per project drawing plans
  - e) Necessary fittings and other works as per the project drawing plans
  - f) Canopied forecourt with dispensing pumps;
  - g) Facilities such as a convenience store and car wash.

## SCOPE

The framework within which this Environmental Management Plan Report (EMP) is developed includes updating the various activities identified in the original EMP, their occurrence in the operational phase and the likely impacts that are associated with those activities. This EMP will only address the Post-Construction activities as the fuel retail facility is already existing and in operation.

The first category of the original EMP report dealt with the pre-construction activities that were identified as impacts and mitigation measures that were required to be employed before the construction of the fuel retail facility. The second category dealt with the construction activities and the mitigation measures that were required to be applied to reduce the severity of the impacts the development may have had on the surrounding environment.

The third category that will be discussed in this EMP report concerns the rehabilitation measures that will need to be implemented during the operational phase of the project, to ensure that the impact of the proposed rehabilitation on the environment is minimized. Furthermore, it will discuss activities that need to be undertaken to ensure that no environmental degradation occurs as a result of the project.

The operation and decommissioning phases involves:

- The maintenance of the fuel storage facilities.
- Maintenance of fuel network pipelines and associated dispensing points.
- Transport of fuel with road transport tanker trucks.
- Dispensing and reticulation of fuel.
- Removal of tanks, pipelines and dispensing equipment.
- Removal of associated buildings and other infrastructure.

The fuel retail facility is supplied with fuel by fuel tanker trucks.

This environmental management plan (EMP) aims to take a pro-active approach by addressing potential problems before they occur. This should limit the corrective measures needed, although additional mitigating measures might be included if necessary.

## POLICY AND OTHER RELEVANT LEGISLATIONS

The following are the legal instruments that controls the construction and operation of Fuel Retail Facilities in Namibia.

### The Namibian Constitution

The Constitution of Namibia encourages wise and sustainable use of its resources. According to Article 95 of Namibia's Constitution, the State shall actively promote and maintain the welfare of the people by adopting policies aimed at the maintenance of ecosystems, essential ecological processes and biological diversity of Namibia and utilization of living natural resources in a sustainable way for the benefit of all Namibians, both present and future.

Article 95 of Namibia's constitution stipulates that: "The State shall actively promote and maintain the welfare of the people by adopting, inter alia, policies aimed at the following:

- Management of ecosystems, essential ecological processes and biological diversity of Namibia and utilization of living natural resources on a sustainable basis for the benefit of all Namibians, both present and future; in particular, the Government shall provide measures against the disposal or recycling of foreign nuclear and toxic waste on Namibian territory."

This article recommends that a relatively high level of environmental protection is called for in respect of pollution control and waste management.

### Environmental Assessment Policy (1994)

The environmental assessment policy details the principles of achieving and maintaining sustainable development that underpin all policies, programmes and projects undertaken in Namibia. This is related in particular, to the wise utilization of the country's natural resources, together with the responsible management of the biophysical environment, which is intended to benefit both present and future generation. The policy also provides guidance on undertaking the assessment procedures.

It further provides a guideline list of all activities requiring an impact assessment. The proposed development is listed as a project requiring an impact assessment as per the following points in the policy:

- Transportation of hazardous substances & radioactive waste.
- Storage facilities for chemical products.
- Industrial installation for bulk storage of fuels.

The policy provides a definition to the term “environment” - broadly interpreted to include biophysical, social, economic, cultural, historical and political components and provides reference to the inclusion of alternatives in all projects, policies, programmes and plans. Cumulative impacts associated with existing developments must be included as well as public consultation. The policy further requires all major industries and mines to prepare waste management plans and present these to the local authorities for approval.

Apart from the requirements of the Environmental Assessment Policy, the following sustainability principles need to be taken into consideration, particularly to achieve proper waste management and pollution control:

### Cradle to Grave Responsibility

This principle provides for those who manufacture potentially harmful products to be liable for their safe production, use and disposal and that those who initiate potentially polluting activities should be liable for their commissioning, operation and decommissioning.

### Precautionary Principle

There are numerous versions of the precautionary principle. At its simplest it provides that if there is any doubt about the effects of a potentially polluting activity, a cautious approach should be adopted.

### The Polluter Pays Principle

A person who generates waste or causes pollution should, in theory, pay the full costs of its treatment or of the harm, which it causes to the environment.

### Public Participation and Access to Information

In the context of environmental management, the public should have access to information and the right to participate in decisions making.

### Environmental Management Act of Namibia (Act 7 of 2007)

The Environmental Management Act, 2007 (Act No.7 of 2007) specifies the environmental assessment procedures to be followed and the activities that required to carry out an EIA. The Act provides a procedure for environmental assessments as indicated under Part VII and Part VIII, which is set out to:

- better inform decision makers and promote accountability in decisions taken;
- strive for public participation and involvement of all sectors of the Namibian community in the environmental assessment process;
- take into account the environmental costs and benefits of proposed policies, programmes and projects;
- take into account the secondary and cumulative environmental impacts of policies, programmes and projects; and
- Promote sustainable development in Namibia, and ensure that a reasonable attempt is made to minimize the anticipated negative impacts and maximize the benefits associated with the development.

### Environmental Management Act, 2007 Regulations (2012)

The Environmental Management Act Regulations have been used as guidance in the compilation of this scoping report. The regulations set out the process to be followed during the compilation of EIA and EMP reports as well as the minimum requirements for such reports.

### National Heritage Act No. 27 of 2004

The Heritage Act of 2004 makes provision for the developer to identify and assess any archaeological and historical sites of significance. The existence of any such sites should be reported to the Monuments Council as soon as possible. The Council may serve notice that prohibits any activities as prescribed within a specified distance of an identified heritage/archaeology site.

### Water Resource Management Act on Namibia (2004)

The Water Resources Management Act, No.24 of 2004 provides for the management, development, protection, conservation, and use of water resources; to establish the Water Advisory Council, the Water Regulatory Board and the Water Tribunal; and to provide for incidental matters. Section 25 obliges the Minister of health to ensure that the water supply is healthy and safe.

### Petroleum Products and Energy Act of Namibia (Act No. 13 of 1990)

“To provide measures for the saving of petroleum products and an economy in the cost of the distribution thereof, and for the maintenance of a price therefore; for control of the furnishing of certain information regarding petroleum products; and for the rendering of services of a particular kind, or services of a particular standard, in connection with motor vehicles; for the establishment of the National Energy Fund and for the utilization thereof; for the establishment of the National

Energy Council and the functions thereof; for the imposition of levies on fuel; and to provide for matters incidental thereto”. *Regulated by the Ministry of Mines and Energy*

#### Pollution Control and Waste Management Bill (guideline only)

With reference to the above, only Parts 2, 7 and 8 applies to the operation of the fuel retail facility (Superior Shell Service Station) on Erf 1159, Onethindi Extension 1, Oniipa Town. Part 2 states that no person shall discharge or cause to be discharged any pollutant to the air from a process except under and in accordance with the provisions of an air pollution licence issued under section 23. And also further provides for procedures to be followed in licence application, fees to be paid and required terms of conditions for air pollution licences.

Part 7 stipulate that any person who sells, stores, transports or uses any hazardous substances or products containing hazardous substances shall notify the competent authority, in accordance with sub-section (2), of the presence and quantity of those substances. The competent authority for the purposes of section 74 shall maintain a register of substances notified in accordance with that section and the register shall be maintained in accordance with the provisions. Part 8 provides for emergency preparedness by the person handling hazardous substances, through emergency response strategies.

#### Atmospheric Pollution Prevention Ordinance of Namibia (No. 11 of 1976)

Part 2 of the Ordinance governs the control of noxious or offensive gases. The Ordinance prohibits anyone from carrying on a scheduled process without a registration certificate in a controlled area. The registration certificate must be issued if it can be demonstrated that the best practical means are being adopted for preventing or reducing the escape into the atmosphere of noxious or offensive gases produced by the scheduled process.

*Regulated by the Ministry of Health and Social Services*

#### Hazardous Substances Ordinance (No. 14 of 1974)

The Ordinance applies to the manufacture, sale, use, disposal and dumping of hazardous substances, as well as their import and export and is administered by the Minister of Health and Social Welfare. Its primary purpose is to prevent hazardous substances from causing injury, ill-health or the death of human beings. *Regulated by the Ministry of Health and Social Services.*



## Public Health Act (Act 36 of 1919)

Section 111 makes provision that requires the local authorities to take measures for the prevention of water pollution. Section 119 provides that no person shall cause a nuisance or shall suffer to exist on any land or premises owned or occupied by him or of which he is in charge any nuisance or other condition liable to be injurious or dangerous to health.

Section 120 requires local authorities to take measures for maintaining their district at all times in a clean and sanitary condition and for preventing the occurrence therein of, or for remedying or causing to be remedied, any nuisance or condition liable to be injurious or dangerous to health.

Various forms of nuisances are set out in section 122. For present purposes the following are most relevant:

- a) any dwelling or premises which is or are of such construction or in such a state or so situated or so dirty or so verminous as to be injurious or dangerous to health or which is or are liable to favour the spread of any infectious disease;
- (e) Any accumulation or deposit of refuse, offal, manure or other matter whatsoever which is offensive or which is injurious or dangerous to health;
- g) any public building which is so situated, constructed, used or kept as to be unsafe, or injurious or dangerous to health;
- (k) any area of land kept or permitted to remain in such a state as to be offensive, or liable to cause any infectious, communicable or preventable disease or injury or danger to health;
- (l) Any chimney (not being the chimney of a private dwelling) sending forth smoke in such quantity or in such manner as to be offensive or injurious or dangerous to health;
- (n) Any other condition whatever which is offensive, injurious or dangerous to health.

The local authority may serve a notice on the author of the nuisance. Should the author refuse or fail to comply the local authority must approach a magistrate to lodge a complaint where upon the latter is required to issue a summons on the author to appear before court.

## MANAGEMENT PRINCIPLES

These guideline principles will form the basis for environmental management on site. Should these principles require modification or additions during the project this should be done at the discretion of the responsible person, who will ensure that any modifications are communicated, explained to and discussed with all affected parties (i.e. the authorities, Superior Investment CC/developer, the contractors and service providers, and any affected party who requests this information).

The environmental operational procedures and environmental issues are identified and managed, under operational and decommissioning phases of the project.

## Environmental Issues that were previously managed

### Pre-Construction Phase

- The Ministry of Environment and Tourism (MET) must be notified:
  - Within 30 days, of change of ownership / developer.
  - Of any change of address of the owner / developer.
  - One month prior to commencement of construction activities.
  - One month prior to commencement of operation.
  
- The owner / developer must ensure to comply with the conditions described in the Record of Decision.
- If required by the Record of Decision, advertise the authorisation for one day for two consecutive weeks in two local newspapers.
- Records of all environmental incidents must be maintained, and a copy of these records be made available to the Ministry of Environment and Tourism (MET) on request throughout project execution.

### Construction and Operational Phases

The responsibilities of the construction contractor(s) and service providers have adhered to the specified EMP actions during the construction phase. During the operational phase, Superior Investment CC will ensure that the following actions are implemented by establishing accountability and responsibility between the different role players.

### Consultation with Interested and Affected parties (IAPs)

Public participation is the cornerstone of development in Namibia and was carried out in accordance with the provisions of the Environmental Management Act, 2007 during the pre and construction phases of the fuel retail facility. During the operational phase, Superior Investments CC must maintain an open communication channel with IAPs such that any queries, complaints or suggestions can be dealt with quickly and by the appropriate person(s).

## ROLES AND RESPONSIBILITIES

This section describes the roles and responsibilities of the key stakeholders involved in the development, implementation and review of the EMP.

### Competent Authority

The Department of Environmental Affairs: Ministry of Environment and Tourism is responsible for the review of the EMP documents it is the competent authority.

### Superior Investments CC

The role of the applicant is as follows:

Superior Investments CC as the applicant, should hire suitably qualified person(s) and assign them with the responsibility to ensure implementation of the EMP, and should:

- Know the contents and implications of the EIA and monitor the implementation of EIA findings using the EMP.
- Revise the EMP as required and inform the relevant parties of the changes.
- The applicant should Review report regarding the implementation of the EMP and make payments to the Contractor if the EMP is being implemented in a satisfactory manner.
- Issue warnings and impose fines and penalties on the Contractor if the Contractor neglects to implement the EMP satisfactorily should there be additions to development.
- Protect the environment and rehabilitate the environment as prescribed in the EIA.

### Superior Investments CC (Project Manager)

The Applicant will appoint the Project Manager. The role of the project manager will be:

- Liaising directly with the relevant authorities with respect to the preparation and implementation of the EMP and meeting the conditions documented in the environmental clearance certificate.
- Bear the overall responsibility for managing the project contractors and ensuring that the environmental management requirements are met.
- Inform the contractors of the EMP and Environmental clearance certificate obligations.
- Approve all decisions regarding environmental procedures and protocols that must be followed.
- Have the authority to stop any construction in contravention with the EMP and RoD.

- In consultation with the Environmental Control Officer (ECO) has the authority to issue fines for transgressions of basic conduct rules and/or contravention of the EMP.
- Maintain open and direct lines of communication between the proponent, Contractor and Interested and Affected Parties (I&APs) with regards to environmental matters.
- Attend regular site meetings and inspections where required.

### Superior Investment CC (Environmental Control Officer)

An Environmental Control Officer (ECO) was employed by the Contractor. They were available for the duration of the construction period and had the appropriate training and experience in the implementation of the EMP and overseeing construction process. The ECO implemented the EMP at all levels and sections (sub-contractors) during the construction of Superior Shell Service Station. The responsibilities of the ECO included the following:

- Assisting the Project Manager and Contractor in finding environmentally responsible solutions to challenges that arised.
- Conducted environmental monitoring as per EMP requirements.
- Monitored performance of the contractors and ensure compliance with the EMP and associated method statements.
- Maintenaned, updated and reviewed of the EMP.
- Liaised between the contractors, authorities and other key stakeholders on all environmental concerns.
- Validated regular site inspection reports which where prepared by the Contractor's Environmental Officer (EO).
- Checked the EO's record of environmental incidents as well as corrective and preventative actions to be taken.
- Checked the EO's public complaints register in which all complaints were registered and actions taken thereof.
- Issuied site instructions to the contractors ECO for corrective actions required.
- Assisted with the resolution of conflict.
- Communicated all amendments of the EMP to the relevant stakeholders.
- Conducted monthly audits to ensured that the system for implementing the EMP is effective.

### Contractor's Safety Officer

- Implemented the recommendations in the EIA and satisfied the conditions in the RoD.
- Ensured that safety was practiced for all activities on site.
- Prepared and implemented safety procedures

- Communicated all safety related issues

## Contractors

The contractor appointed the Contractor's representative who was suitably qualified to implement the EMP. The responsibilities of the Contractor included:

- Compliance with the relevant legislation and the EMP.
- Preparation and submission to the proponent through Project Manager the following Management Plans prior to commencing work:
  - Environmental Awareness Training and Inductions;
  - Emergency Preparedness and Response;
  - Waste Management; and
  - Health and Safety.
- Environmental awareness presentations (inductions) were given to all site personnel prior to work commencement; the ECO provided the course content and the following topics were covered:
  - The importance of complying with the relevant Namibian, International and Best Practice Legislation.
  - Roles and Responsibilities, including emergency preparedness.
  - Basic Rules of Conduct (Do's and Don'ts).
  - EMP: aspects, impacts and mitigation;
  - Fines for Failure to Adhere to the EMP;
  - Health and Safety Requirements.
- Record keeping of all environmental awareness training and induction presentations; and
- Attend regular site meetings and environmental inspections.

## Resident Engineer (RE)

The Resident Engineer (RE) was appointed by the 'Consultant' and was required to oversee the construction program and construction activities performed by the Contractor. The RE was expected to liaise with the Contractor and ECO on environmental matters, as well as any relevant engineering matters that may have environmental consequences.

## PHASES OF THE PROJECT

### The Construction Phase

The bulk of the impacts during this phase may have had immediate effects (e.g. noise, dust and water pollution). However, the site was monitored on a continual basis during the construction phase, it was possible to identify these impacts as they occurred during the construction phase of the project. These impacts were then mitigated through the contingency plans identified in the planning phase, together with a commitment to sound environmental management from the developer.

This EMP is prepared for the operational and decommissioning phases of the project as Superior Shell Service Station is already operational. Thus, the impact for the pre-construction and construction phases will not be discussed in this report

## The Operational Phase

By taking pro-active measures during the planning and construction phases, the owners have made sure that the potential environmental impacts emanating during the operational phase will be minimised. This, in turn, will minimise the risk and reduce the monitoring effort, but it does not make monitoring obsolete.

Impacts	Description	Mitigation	Monitoring	Responsible Body
<b>Hydrocarbon Spillage</b>	Spillage of hydrocarbons might occur if the storage tanks are damaged or are not properly maintained.	<p>Risk of impact from this can be lowered through proper training of staff and the installation of suitable containment structures</p> <p>Spill Contingency Plan</p> <p>Spillage occurring at the filler point and dispensing (i.e. offloading) area must be contained and if it happens must be cleaned up as soon as possible. Wastewater generated as a result of the spillage and associated clean up, must be disposed of safely and in accordance with environmental legislation. No cleaning bi-products must be discharged into municipal storm water drainage/ sewer system and or surrounding environment.</p> <p>The operator shall ensure that all staff are trained on how to prevent and handle fuel spills and shall</p>	<p>Strict operational times.</p> <p>Regular inspections.</p> <p>The Underground Storage Tanks must be inspected on a daily basis and verify weather oil spillage has occurred.</p> <p>By Engineer and ECO</p>	Superior Investments CC / ECO/Engineer

		<p>ensure that his employees are aware of the procedure for dealing with spills and leaks.</p> <p>The Operator shall also ensure that the necessary materials and equipment for tackling oil spills and leaks is available on site at all times.</p> <p>The Operator shall ensure that there is a sufficient supply of absorbent material readily available to clean up hydrocarbons that is released.</p> <p>The Operator shall notify the relevant authorities of any spills that occurs.</p>		
<b>Overfilling of Tanks</b>	Overfilling of the tanks may take place.	The Underground Storage Tanks must be fitted with an overfill protection device. All oil tanker offloading the oil must also be fitted with the overspill technology.	Regular inspection of the level of fuel in tanks. By Engineer and ECO	Superior Investments CC / ECO
<b>Overfilling of vehicles with fuel</b>	Overfilling of individual vehicles with fuel by the fuel retail facility operators.	This impact can be reduced by the installation of spill containment areas around the pumps and through proper training of the operators.	Regular visual inspection by operator	Superior Investments CC / operator



		Fuel dispensing pipes must contain nozzles equipped with automatic oil stoppers.		
<b>Fire and Explosion Hazard</b>	Hydrocarbons are volatile under certain conditions and their vapours in specific concentrations are flammable. If precautions are not taken to prevent their ignition, fire and subsequent safety risks may arise.	<p>Ensure that all fire-fighting devices are in good working order.</p> <p>All personnel must be equipped with training in firefighting techniques and the fire protection measures to be taken in case of an emergency. Good housekeeping practices such as the removal of flammable materials should be enforced.</p> <p>Fire hydrants should be available on site in case of an emergency.</p>	Regular inspections should be carried out to inspect and test that the firefighting equipment is in working order and pollution control materials at the fuel facility.	Superior Investments CC / Appointed Engineer/ ECO
<b>Damage to Pipelines and Tanks</b>	Damage to pipelines and tanks may occur due to vehicle movements and excavations. Leakage of the damaged structure is most likely to follow.	<p>This can be mitigated through careful designs, warning signs and sensible operations in the area.</p> <p>Utility clearance investigations should be conducted before any excavation commences on the site.</p>	Flow meters to be installed on either sides of an underground pipeline to monitor the input and output through the pipe. If input does not equal the output, then a leakage can be assumed on the	Superior Investments CC / Engineer/ ECO

			pipeline. For above ground level storage tanks, regular visual inspections for leakages should be made, when filling tanks.	
<b>Air Quality</b>	In terms of air quality, hydrocarbon vapours will normally be released during delivery as liquid displaces the gaseous mixture in the tanks.	<p>All venting systems and procedures have to be designed according to SANS standards and placed in a sensible manner.</p> <p>All forms of dust/air pollution must be managed in terms of the Atmospheric Pollution Prevention Ordinance of Namibia (No. 11 of 1976) this includes the control of noxious and offensive gases, smoke, dust and vehicular emissions. Under no circumstances may heavy smoke be released into the air.</p>	A complaints register regarding vapour smells should be kept and acted on if it becomes a regular complaint.	Superior Investments CC / Appointed Project Manager / Engineer/ ECO
<b>Health and Safety</b>	The operations of fuel retail facility can cause serious health and safety risks to workers on site. Occupational exposures are normally related to the dermal contact	<p>Adequate measures must be brought in place to ensure safety of staff on site, and includes:</p> <p>1) Proper training of operators; Relevant operational staff must receive training on the correct</p>	Monitoring should be carried out on a regular basis, including accident reports.	Superior Investment CC / ECO/ ELO

	<p>with fuels and inhalation of fuel vapours during handling of such products.</p>	<p>operation of the storage tanks, as well as maintenance and repair procedures when leaks are detected.</p> <p>2) First aid treatment;  3) Medical assistance;  4) Emergency treatment; Fire extinguishers and sand bags must be readily available onsite and easily accessible.</p> <p>5) Prevention of inhalation of fumes;  6) Protective clothing; The correct PPE should be used on the site.</p> <p>Contact details of emergency services shall be posted conspicuously in the offices and around the fuel retail facility for use in emergency situations.</p> <p>Appropriate Health &amp; Safety signage must be placed on and around the tank.</p>		
--	--	--	--	--

Impacts	Description	Mitigation	Monitoring	Responsible Body
<b>Economic Impacts</b>	Employment of local people due the operation of the fuel retail facility.	The operator of Superior Shell Service Station have only employed local people to operate the fuel retail facility. All people employed at the facility are Namibians.	Regular inspections Equity, transparency, should be put into account when hiring and recruiting and that Public Participation I.e. Community Leaders or Community committees Should also take part in the recruiting process.  Qualifications e.g. Certificates should be provided.	Superior Investments CC
<b>Generation of waste</b>	Waste in the form of contaminated soil due to spillage might occur, but should be prevented through	Waste minimization policy. Bioremediation of contaminated soil. Regular cleaning of oil / water separator.	Regular monitoring of the oil water separator outflow is required.	Superior Investments CC / Engineer/ ECO

	<p>the use of containment areas as provided.</p> <p>Impact on water quality</p>	<p>Removal of sand and other material from containment areas.</p> <p>All general waste should only be collected either by the Oniipa Town Council or by the waste disposal Licensed contractor authorized by the Oniipa Town Council</p>	<p>Containment area inspections.</p> <p>Inspection for soap in oil / water separator water.</p> <p>The following parameters must be monitored as indicators of potential organic contamination:</p> <p>Total petroleum hydrocarbon (TPH) levels - Diesel range organics, total oil &amp; grease.</p>
--	---	--	--

## ENVIRONMENTAL MONITORING PLAN

Environmental monitoring plan is part of the EMP performance assessment and will need to be compiled and submitted as determined by the Environmental Commissioner. The process of monitoring performances against the objectives and documenting all environmental activities is part of internal and external auditing. This will be coordinated by the Environmental Control Officer (ECO) / External Consultant / Suitable qualified in-house resource person. Tables 3 outline the type of information that shall need to be recorded on a regular basis by the Environmental Control Officer (ECO) as part of the monitoring process of the activities and the effects.

Mitigation	Compliance	Follow-up action required	By whom	By When	Completed
Is there an Environmental awareness training programme?					
How many people have been given environmental awareness training?					
Is a copy of the EMP on site?					
How effective is the awareness training?					
Do people understand the contents of the EMP?					
If not, where are the weaknesses?					
Ask 3 people at random various					

questions about the EMP.					
--------------------------------	--	--	--	--	--