



If you can't measure it  
You can't control it

**ENVIRONMENTAL MANAGEMENT PLAN (EMP REPORT)**  
**for an existing SCRAP METAL SALES CC**  
**Project No: 2020 / 195 / I**

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## EXECUTIVE SUMMARY

National Environmental Health Consultants was commissioned by **SCRAP METAL SALES CC** to undertake an Environmental Impact Assessment (EIA) – Environmental Management Plan (EMP) for the existing **SCRAP METAL FACILITY** in Walvis Bay.

The EMP is being undertaken in accordance with the requirements of Namibia's Environmental Assessment Policy and the Environmental Management Act (2007), and other relevant legislation and regulations pertaining to Environmental Assessments and protection of the environment in the Republic of Namibia. A host of international policies and standards are also being taken into account.

In order for the Namibian Ministry of Environment and Tourism (MET) to make an informed decision as to whether or not the project should receive an environmental clearance certificate and be allowed to proceed, it is essential that potentially significant environmental and social impacts (both negative and positive) are investigated and well understood. It is therefore necessary to conduct an Environmental Management Plan (EMP) process. This led to National Environmental Health Consultants being appointed by **SCRAP METAL SALES CC** to undertake the EMP for the existing **SCRAP METAL FACILITY** in Walvis Bay.

Due to the fact that this is an existing facility with two divisions, one in Swakopmund and the other one in Walvis Bay operating under **SCRAP METAL SALES CC**, NEHC CC were contracted to conduct an Environmental Management Plan (EMP) process for these two existing scrap metal facilities.

The purpose of the EMP Report is to:

- Provide a description of the existing facility, including a sufficient level of detail to inform the Ministry of Environment and Tourism;
- Describe the local environment within which the existing facility is situated, to assist further in identifying issues and concerns.

## Glossary and Abbreviations

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<b>ACRONYM</b>	<b>DESCRIPTION</b>
<b>CC</b>	Close Corporation
<b>CEs</b>	Consulting Engineers
<b>CO</b>	Contraction Phase
<b>CLO:</b>	Community Liaison Officer
<b>DS</b>	Design & Planning Phase
<b>DE</b>	Decommissioning Phase
<b>ECO</b>	Environmental Control Officer
<b>EMP</b>	Environmental Management Plan
<b>EMPr</b>	Environmental Management Programme
<b>MET</b>	Ministry of Environment and Tourism
<b>OP</b>	Operational Phase
<b>PM</b>	Project Manager (Developer Representative)
<b>RA</b>	<i>Resident Architect</i>
<b>ELO</b>	<i>The Environmental Liaison Officer</i>
<b>VOC's</b>	Vapours

### Definitions:

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**Environment:** Surroundings in which an organisation operates, including air, water, fauna, flora, natural resources, humans and their interrelations.

**General waste:** Waste that may be disposed of without prior treatment. May be disposed of at a municipal dumpsite.


**Hazardous waste:** An inorganic or organic element or compound that, because of its toxicological, physical, chemical or persistency properties may exercise detrimental, acute or chronic impacts on human health and the environment. This can be generated from a variety of activities and may take the form of liquid, sludge, gas or solid. Hazardous waste can also be defined to be any waste that directly or indirectly represents a threat to human health or to the environment.

**Recyclable Waste:** Hazardous or general waste that has the potential to be recycled.

**Waste:** Any matter gaseous, liquid and solid or any combination thereof designated as an undesirable or superfluous by-product, emission, residue or remainder of any process or activity.

**Waste Stream:** The cycle of a specific waste from the point of origin up to disposal (cradle to grave concept).

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# 1 INTRODUCTION

The project proponent, **SCRAP METAL SALES CC** has appointed National Environmental Health Consultants as the independent consultant for this EIA process.

The purpose of an Environmental Management Plan (EMP) is to guide the operational phase of the existing **SCRAP METAL** facility. This is done to eliminate or mitigate the various possible risks to the environment and its surrounding inhabitants during this phase. And it will subsequently ensure that minimal damage will occur to these areas during the operational phase of the existing **SCRAP METAL** facility, based on the mitigation measures identified for inclusion in the EMP.

The ultimate goal of the EMP is to meet social, economic and biophysical objectives to such an extent that the overall product of the activity will not result in a net negative impact. The economic benefit of the existing **SCRAP METAL** facilities in Walvis Bay and Swakopmund, should outweigh the negative environmental impacts addressed during this assessment.

## 1.1 Locality



**Figure 1: Location of the existing, SCRAP METAL SALES CC Walvis Bay. This also shows where in Namibia the SCRAP METAL facility is situated.**

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**Figure 2: Location of the existing, SCRAP METAL SALES CC – Walvis Bay. With GPS Points.**



**Figure 3: Location of the existing, SCRAP METAL SALES CC Swakopmund. This also shows where in Namibia the SCRAP METAL facility is situated.**

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Figure 4: Location of the existing, SCRAP METAL SALES CC – Swakopmund. With GPS Points.

## 1.2 Project Background Information

**Scrap Metal Sales** is a family owned business that originated in May 1996. The business started off with the owner and one employee working part time from home and has since grown to three family members acting as partners and 28 permanent employees. The operations have grown across four properties in the industrial area, including offering the services of skip rental and cleaning and extended to a small branch in Swakopmund.

The partners intend on adding one more partner to the team in the near future and envision the growth of the small branch in Swakopmund to a larger operation.

The partners are proud to be part of a business that contributes to the preservation of our country's environment. The recycling of scrap metal is advantageous to the environment, because less metal will end up and taking space in landfill sites. The two existing landfill sites should be reserved exclusively for non-recyclable items and metals such as aluminium cans, tins, copper wiring, pipes, etc. can all be recycled and transformed into new materials. When left to waste away in a landfill, they release methane and contribute to air and soil pollution.

**SCRAP METAL SALES – Walvis Bay** is situated on the corner of Circumferential Road and Hidipu Hamutenya Avenue, Light Industrial Area (Figure 1). Adjoining businesses are Adcon Construction, Acton Engineering and Africa Marketing with Namib Diving Marine Services and Pam Refrigeration opposite the street.

**SCRAP METAL SALES – Swakopmund** is situated on erf 4057, Rakatokka Street, Swakopmund, Erongo Region. Adjoining business is Municipal Abattoir in Düsck Street but no businesses opposite the street.

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Scrap Metal Sales is situated in an industrial zoned area with similar industrial businesses surrounding it thus making the area satisfactory for scrap recycling, gas flame cutting and salvage operations. There are no residential areas in close proximity to Scrap Metal Sales and our adjoining neighbours. Scrap Metal Sales is in possession of a current Fitness Certificate from the Municipalities of Walvis Bay and Swakopmund and is registered as a Scrap Metal Dealer.

This Environmental Management Plan (EMP) addresses the management of environmental Impacts related to the existing **SCRAP METAL** facility, namely **SCRAP METAL SALES CC**. The documents should be used for managing, mitigating and monitoring the environmental impacts associated with decommissioning the site as identified during the Environmental Scoping Report conducted on the site. The Environmental Scoping Report will be valuable as a reference source for understanding this EMP and for placing it into perspective (see part 1 of this document for the scoping report).

### 1.3 Operational Elements

The day to day operational production of Scrap Metal Sales consists of two elements namely:

- Salvage and recycling of scrap metals acquired from domestic, engineering and the manufacturing industries in Walvis Bay, and
- Export of the scrap metals to other countries.

#### 1.3.1. Salvage and Recycling of Scrap Metals

The salvage operation of Scrap Metals Sales involves the salvage of metals that have been deemed obsolete or unsafe for the use in industrial and domestic sector. Due to the aggressive climate conditions, the coastal regions of the Erongo Region, metals are prone to chemical processes resulting in degradation/corrosion of the said material. Such salvaged metals originate from the automotive sector, the engineering sector to the construction sector and encompasses a wide range of uses. Metals are subdivided mainly into two groups during the recycling process at Scrap Metal Sales. Ferrous and Non-Ferrous. Ferrous metals predominantly contain an element called Iron. Non-Ferrous metals typically lack this element and are more durable and resistant to climate conditions described above.


The salvage and recycling operational elements at Scrap Metal Sales can be classified into of five groups:

- Loading and Unloading
- Sorting and Separation
- Deconstruction
- Bailing of Scrap Metal
- Flame Cutting

#### *I. Loading and Unloading*

The usual process involved with the salvage and recycling of scrap metal begins with the collection of scrap metal at the premises of the client. This will involve typically a truck of Scrap Metal Sales loading the scrap metal as per the client's request, at the client's business or residential home onto the truck and transporting it to Scrap Metal Sales. Once there, the scrap metal will be assessed to determine under what classification it will be sorted and then it will be weighed on the truck scale. At Scrap Metal Sales there are a fleet of vehicles ranging from Skip trucks, Grab trucks, Light trucks and Forklifts that assist in the loading and offloading of materials. Operating this fleet poses hazards which are mitigated with drivers operating the said vehicles with appropriate licenses.

Included in this process is the final loading of the recycled and sorted scrap into containers to the buyers of Scrap Metal Sales. Here the recycled scrap or compacted bales are loaded into containers as per requirements and once the container has been deemed to be completed the transporter is contacted and the container is collected.

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**Figure 5. Scale for receiving of scrap material.**



**Figure 6. Scale for receiving of scrap material2.**

**II. Sorting and Separation**

This process is very labour intensive and requires that Scrap Metal Sales ensures that their employees have the correct Personal Protective Equipment (PPE) and are trained for the job at hand. Due to the hazards of various types of metal such as lead and oxidized iron, injury and contamination could occur if exposed to it without the proper PPE. Gloves and overalls are standard issue PPE to mitigate injury and key personnel have been identified and trained in First Aid to render qualified assistance should injury such as cuts or abrasions occur. Proper injury recording is required by the employer and a special First Aid Report book has been acquired to log such events.

Once Sorting and Separation begins, materials are identified that are recyclable, waste, and hazardous materials. Once these have been sorted, they are recycled or disposed of in the appropriate manner at a hazardous waste facility or landfill site depending on what it has been identified as.

**III. Deconstruction**

This process typically will involve tools and power tools to dismantle scrap material when the material is mixed with non-recyclable materials or waste. The most common tool used in this process is an electrical grinder which cuts material by means of a cutting disc operating at high speeds. Here training is given how to safely operate the tool and then follow-up training given bi-annually. PPE for this task is specific and comprises a face shield, ear protectors and gloves. Because this activity also produces sparks care is taken to do this activity in an environment free from flammable materials or liquids with fire extinguishers readily available. Occasionally scrap material will be deconstructed with hand tools like spanners, screwdrivers and ratchets.

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**IV. Bailing of Scrap Metal**

The Bailing operation of Scrap Metal Sales consist of two separate hydraulic operated machines. One is a mobile Bailing machine on a truck bed and the other placed on the premises, which is stationery. The scrap material that is recycled and processed with these machines is vehicle bodies, food and beverage cans, kitchen appliances. Any scrap metal that is generally thinner in diameter than 2mm. If the scrap metal is thicker in diameter to this it will not be sorted for bailing as it will not be malleable enough to compress and crush. Care must be taken when crushing particular scrap such as bottles with compressed gasses (refrigerants), or metal containers that are sealed containing liquids under pressure or flammable materials. These must be removed before being processed to prevent unnecessary health hazards for the employees and spillage into the environment. Training is given to employees how to safely operate the stationary Bail machine and follow-up training is given bi-annually. Scrap Metal Sales must still do a risk assessment and establish a training program for the safe operation on the mobile Bail machine.



**Figure 7. Hydraulic Bale Machine**



**Figure 8. Compressed Bales**

**V. Flame Cutting**

The use of gas flame cutting is a critical part of the recycling process at Scrap Metal Sales and is used to cut scrap metal into more manageable sizes not greater than 1.5m x 1.5m as per our buyers' requirements. The components of gas flame cutting are an oxygen bottle, LPG (Liquefied Petroleum Gas) gas bottle, pressure regulators for each, fuel lines, cutting torch. The hazards that employees who operate this are identified as heat, light radiation, gases and sparks. Employees using these tools have special flame-resistant overalls, leather aprons, leather gloves resistant to

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heat and eye protection. Flashback arrestors are also installed to prevent flames accidentally running back from the torch to the gas bottles.

The operation of torches presents a fire hazard when cutting materials like vehicles with upholstery and fuel tanks as well as scrap material mixed with plastics or wood.

Gas bottles (Oxygen and LPG) are under pressure and their contents by nature are flammable thus they pose a risk of exploding or leaking if not handled or stored correctly. Gas bottles used for flame cutting are stored on site (Figure 6.) in a secure site which is locked and displays warning signage.



**Figure 9. Compressed Gas Storage**

### **1.3.2. Exporting of Scrap Metals to Other Countries**

The conclusion in the scrap recycling process at Scrap Metal Sales is the loading of the processed and sorted scrap material (Baled and/or scrap metal material) into a shipping container for export. Through-out the loading process photos are taken to ensure that the correct and prescribed scrap metal and/or bales are loaded. Once the loading process is completed, the Buyer arranges for collection of the shipping container to be loaded and transported with Wesbank Transport, where the shipping container is weighed to check that the container meets the weight requirements and after weighing it is transported to the Walvis Bay Harbour Container Terminal for storage. Once weighed, the Buyer formalizes the supporting documentation and presents it to the Namibian Ports Authority Namport Official who will check the shipping container and seal it for shipping to the Buyers destination.

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Figure 10. Swakopmund Site

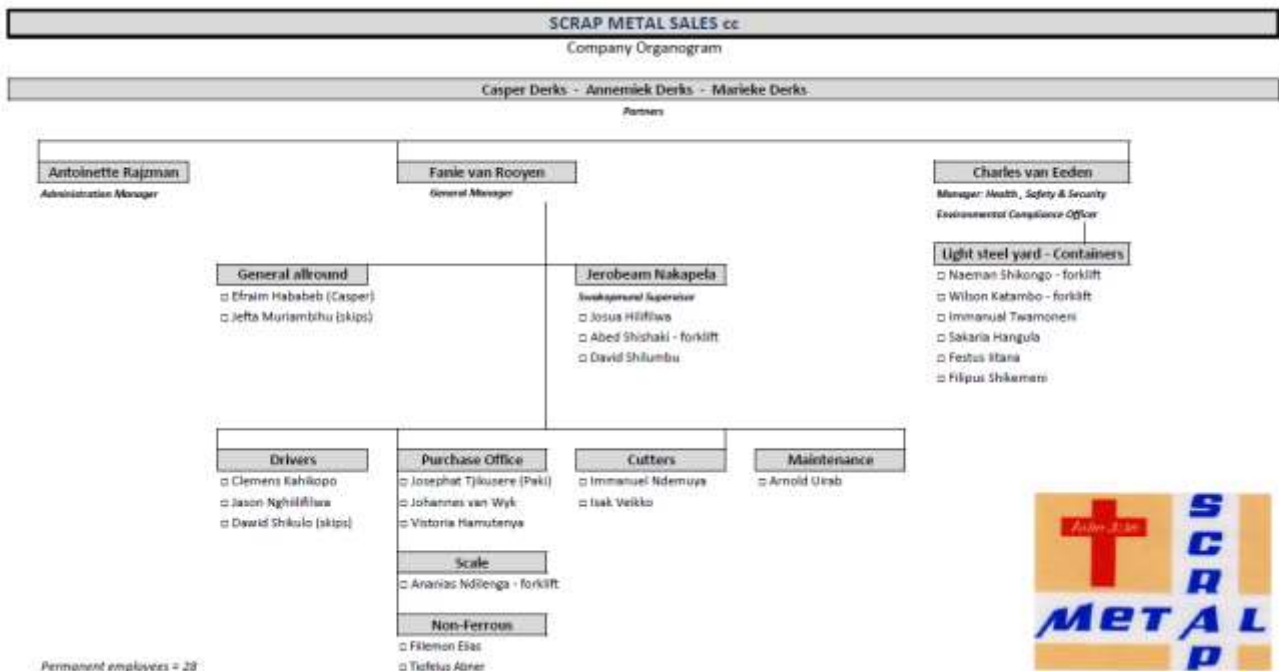


Figure 11. SCRAP METAL SALES CC Organogram

### 1.4 Objectives of the EMP

The primary objectives of the EMP are as follows:

- To describe action plans for achieving the mitigation measures described in the Environmental Scoping Report; and
- To indicate responsibilities regarding the implementation of these action plans.

**SCRAP METAL SALES CC** completed the first EMP Report as an inhouse action to comply to the set legislation dated 20 August 2020. **SCRAP METAL SALES CC** application APP-001841 was then verified by MET and **SCRAP METAL SALES CC** had to upload additional information and

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documentation. NEHC completed the EMP Report, in November 2020 and uploaded the required documentation onto the MET's portal for final review and approval by the Office of the Environmental Commissioner dated November 2020.

## 1.5 Key Characteristics of the report

**Table 1: Shows an overview of the project.**

Element	Description
Proponent	<b>SCRAP METAL SALES CC</b> . Mr. Casper Derks
Name of the site	<b>SCRAP METAL SALES CC "SCRAP METAL"</b>
Property Description – <i>Walvis Bay</i>	<b>SCRAP METAL SALES CC</b> , Erf no 2620, 2619, 2616, 2615 and 2614, Corner of Circumferential Road and Hidipu Hamutenya Avenue Walvis Bay, Erongo Region.
Property Description – <i>Swakopmund</i>	<b>SCRAP METAL SALES CC</b> , Erf no 4057, Rakatokka Street, Swakopmund, Erongo Region.
Site Coordinates – <i>Walvis Bay</i>	<ol style="list-style-type: none"> <li>1. "S 22°57'4.51" – "E 14°31'6.81",</li> <li>2. "S 22°57'3.32" – "E 14°31'5.70"</li> <li>3. "S 22°57'2.51" – "E 14°31'8.47",</li> <li>4. "S 22°57'1.65" – "E 14°31'7.07"</li> <li>5. "S 22°57'0.90" – "E 14°31'9.84",</li> <li>6. "S 22°56'59.89" – "E 14°31'8.42",</li> <li>7. "S 22°56'58.41" – "E 14°31'11.68" and</li> <li>8. "S 22°56'57.52" – "E 14°31'10.29"</li> </ol>
Site Coordinates - <i>Swakopmund</i>	<ol style="list-style-type: none"> <li>1. "S 22°40'1.01 – "E 14°32'9.88",</li> <li>2. "S 22°40'0.14" – "E 14°32'9.09,</li> <li>3. "S 22°40'0.62" – "E 14°32'10.43" and</li> <li>4. "S 22°39'59.82" – "E 14°32'9.57"</li> </ol>
Extent of the site – <i>Walvis Bay</i>	Erf no 2620 – 2084m <sup>2</sup> , 2619 – 1500m <sup>2</sup> , 2616 – 1600m <sup>2</sup> , 2615 – 1500m <sup>2</sup> and 2614 - 1500m <sup>2</sup>
Extent of the site – <i>Swakopmund</i>	Erf no 4057 – 1861m <sup>2</sup>
Current capacity of the two sites	Existing <b>SCRAP METAL</b> facilities
Baseline environment	<ul style="list-style-type: none"> <li>➤ Limited vegetation on the site;</li> <li>➤ There are no surface water bodies located within a 500m radius of the site;</li> <li>➤ Area is characterized as not having a shallow water table.</li> </ul>

## 1.6 COMPLIANCE TO REGULATIONS

**SCRAP METAL SALES CC** will need to comply with the following legislation:

- The Constitution of the Republic of Namibia (1990)
- Namibia's Green Plan
- Vision 2030: Third National Development Plan of Namibia, 2006/7 – 20011/12
- Environmental Assessment Policy, 1995
- Draft Wetland Policy of 2003
- The National Environmental Health Policy
- GOVERNMENT GAZETTE OF THE REPUBLIC OF NAMIBIA, Government NOTICES, dated 06 February 2012 number 4878.
- Environmental Management Act 7 of 2007
- The Water Resources Management Act 24 of 2004
- Labour Act of 1992: Regulations for the Health and Safety of Employees at Work

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- Labour Act 11 of 2007
- Nature Conservation Ordinance 4 of 1975 (as amended 1996)
- Atmospheric Pollution Prevention Ordinance 11 of 1976
- Petroleum Products and Energy Amendment Act of 2000
- Soil conservation Act 76, 1969
- Legislation related to effluent and waste water disposal Model Drainage Regulations, 1996
- Water Resources Management Act (Act 24 of 2004)
- Hazardous Substances Ordinance 14 of 1974, and amendments
- Nature Conservation Ordinance Amendment Act, Act 5 of 1996
- National Policy on Tourism for Namibia, 2008
- Namibia is the National Heritage Act (27 of 2004).

## 1.7 Responsible Parties

### 1.7.1 Phases of the Project

The point of departure for any EMP is to take a pro-active route by addressing and minimizing any potentially significant problem before it occurs. In particular this EMP deals with the current operational phase.

### 1.7.2 Roles and Responsibilities

Various role players have a range of responsibilities to perform during the operational phase and if any upgrades or construction take place on the existing **SCRAP METAL** facility:

#### 1.7.2.1 Project Manager (PM) (Developer Representative)

If any upgrades or construction take place on the existing **SCRAP METAL** facility the PM will be responsible for the following:

- The PM will be responsible for ensuring that the development is implemented according to the requirements as set out in the EMP.
- The PM should ensure that sufficient resources are available to the other role players to efficiently perform their tasks in terms of the EMP.
- The PM must appoint an independent Environmental Control Officer (ECO) to ensure strict adherence to the EMP.

#### 1.7.2.2 Resident Architect (RA)

If any upgrades or construction take place on the existing **SCRAP METAL** facility the RA will be responsible for the following:

- Only architects approved by the PM will be allowed to work on the project and will oversee the individual contracts between the owners of the entire site or portions thereof and the contractors.

#### 1.7.2.3 Environmental Control Officer (ECO)

If any upgrades or construction take place on the existing **SCRAP METAL** facility, the ECO will be appointed at the start of construction and is mandated to do the following:

- Ensure that all contractors/subcontractors/employees are fully aware of their environmental responsibilities. This will take the form of an initial environmental awareness-training program in which the requirements of this document will be explained.
- Any damage to the environment must be repaired as soon as possible after consultation between the ECO, the Consulting Engineer and relevant contractors.
- The ECO shall monitor their actions to ensure that the developer and/or contractor are adhering to all stipulations of the EMP.
- The ECO shall be responsible for monitoring the construction activities throughout the project by means of site visits and meetings. This should be documented as part of the site meeting minutes.
- The ECO must sign off and the PM must certify that all clean-up and rehabilitation, or any remedial action required, are completed prior to transfer of properties.
- A post-construction environmental audit is to be conducted to ensure that all conditions in the EMP have been adhered to.

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#### 1.7.2.4 Auditing / Inspections

If any upgrades or construction take place on the existing **SCRAP METAL** facility,

- The appointed ECO on a regular basis should inspect the site where necessary.
- The PM or the contractor's representative will accompany the ECO on-site inspections.
- The contractor will use the formats presented in this EMP to report to the PM in terms of compliance to this document.
- When, in the opinion of the ECO, a construction activity will result in environmental damage, the ECO will issue instructions to the contractor or PM, who will in turn order the contractor, to halt the activity. Spot fines or penalties may be levied for non-compliance.

#### 1.7.2.5 Method Statements

If any upgrades or construction take place on the existing **SCRAP METAL** facility, construction methods statements from the contractor will be required for specific activities in sensitive environments on request of the Authorities or the ECO. All method statements will form part of the EMP documentation and are subject to all terms and conditions contained within the EMP document. For each instance wherein it is requested that the contractor submit a method statement to the satisfaction of ECO, the format should clearly indicate the following:

- What - a brief description of the work to be undertaken;
- How - a detailed description of the process of work, methods and materials;
- Where - a description / sketch map of the locality of work; and
- When - the sequencing (phases) of actions with commencement date and completion date estimates.

The contractor must submit the method statement before any particular construction activity is due to start. Work may not commence until the method statement has been approved by the ECO.

#### 1.7.2.6 Record Keeping

All records related to the implementation of this management plan must be kept together in an office where it is safe. Records should be kept for two years and at any time are available for scrutiny by any relevant Authority.

#### 1.7.2.7 Resident Engineer (RE)

If any upgrades or construction take place on the existing **SCRAP METAL** facility, a RE acts as a direct, on-site resource for all technical aspects related to the development. He/she is available on the construction site at all times, overseeing all phases of the construction activities. He/she will liaise with the ECO where required to ensure EMP implementation.

#### 1.7.2.8 Consulting Engineers (CEs)

If any upgrades or construction take place on the existing **SCRAP METAL** facility, the engineers involved during the planning, design and construction period. They are not available on site at all times, but are part of the specialist team during the final design and construction stages to advise on appropriate environmental management and mitigation.

### 1.7.3 Standards

If any upgrades or construction take place on the **SCRAP METAL** retail facility,

- The ECO will keep written and photographic records of the site and its surroundings before, after and during construction on the site.
- The contractor will keep records of construction activities, instructions received from the ECO and PM concerning environmental matters.
- The ECO will keep records of cases of non-compliance and remedial actions taken.
- Where no quantitative standards are applicable, visual standards will apply.
- The contractor will rehabilitate the site to a condition acceptable to the ECO, and respond timeously to any complaints and instructions regarding construction activities.

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### 1.7.4 EMP Objectives

This EMP must be used during the current operational phase of the existing **SCRAP METAL** facility.

The objectives of this plan are to:

- Ensure all environmental safeguards are carried out correctly.
- Manage site activities effectively and coordinate with other players in the project.
- Minimize adverse impacts on the environment.
- Ensure that environmental mitigation measures are in place from the start of the project.
- Minimize disruption to fauna and flora and neighbouring landowners / communities.
- Monitor the project.

### 1.7.5 EMP Context

This EMP fits into the overall planning process of the project and should be implemented by the developer as soon as the Authorities have approved it. A copy of the EMP should always be available on site.

There are at least 2 role players participating in the environmental management of the site, namely:

- **SCRAP METAL SALES CC**; and
- Service Providers.

This EMP must be attached as an Appendix to service provider tender documents and referred to in the tender documents as *special conditions of tender*.


Ultimate responsibility for implementation of the EMP lies with **SCRAP METAL SALES CC**. This responsibility, in some instances may be delegated to contractors in the employ of **SCRAP METAL SALES CC** for practical purposes, but **SCRAP METAL SALES CC** will retain legal accountability. In that capacity, **SCRAP METAL SALES CC** should delegate suitably qualified person(s) with the responsibility to ensure the implementation of the EMP, and who will:

- Know the contents and implications of the Environmental Scoping Report and monitor the implementations of the Environmental Scoping Report findings using the EMP;
- Guide, advise, and consult the contractors on environmental issues during decommissioning of the service station;
- Revise the EMP as required and inform relevant parties of the changes;
- Protect the environment.
- Responsibility of the Service Providers and Contractors during the decommissioning of the service station is to:
  - Ensure that all requirements of the EMP are communicated to, understood and followed by all persons working on the project who may have an impact on the environment;
  - Ensure that a procedure exists for reporting incidents and resolving any problems rapidly;
  - Keep good records relating to the compliance/non-compliance with the conditions of the authorization;
  - These records must be made available to the relevant authority within seven days of a written request.

## 2 PHASES OF THE PROJECT

The aim of this Environmental Management Programme (EMPr) is to derive mitigation measures that should be made binding when additional contraction activities result in the appointment of contractors on site, as well as measures that should be implemented during the current operational phase.

The purpose of the EMPr is to provide solutions to problems before they occur. If adhered to this EMPr should limit corrective measures required during the current operational phase of the existing **SCRAP METAL** facility.

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**The EMPr deals with the following phases as detailed below:**

### 2.1 The Planning Phase

This is an existing **SCRAP METAL** facility thus there will be no planning phase.

### 2.2 Pre-construction Phase

This is an existing **SCRAP METAL** facility thus there will be no Pre-construction Phase.

### 2.3 The Construction Phase

This is an existing **SCRAP METAL** facility thus there will be no construction phase.

If any upgrades or construction take place on the existing **SCRAP METAL** facility, the majority of the impacts during this phase will have a direct and immediate effect (e.g. pollution, noise and dust). Continual monitoring of the site during the construction phase will help in identifying impacts as they occur.

### 2.4 The Operational Phase

This is an existing **SCRAP METAL** facility thus this scoping and EMP report mainly refers to the current operational phase. Potential environmental impacts arising during the current operational phase can be minimized, if the EMP is followed.

## 3 ANTICIPATED ENVIRONMENTAL IMPACTS

The anticipated adverse impacts requiring mitigation relating to the biophysical and socio-economic environment for the current operational phase of the existing **SCRAP METAL** facility are listed below

### 3.1 Operational Phase - Adverse Impacts

- Visual Intrusion & Light Pollution
- Traffic
- Noise
- Atmospheric Pollution & Odours
- Safety & Security
- Soil & Groundwater Contamination (Surface spillage of fuel)
- Subsurface leaks (lines, tanks)
- Risks of Fires & Explosions
- Waste Generation & Disposal

## 4 RESPONSIBILITIES

The Environmental Management Programme (EMPr) specifies the responsibilities of the role players.


**SCRAP METAL SALES CC:** remains ultimately responsible for ensuring that the facility is implemented according to the requirements of the EMPr throughout all phases of the project. This includes the current operational phase and if any upgrades or construction take place on the existing **SCRAP METAL** facility.

- **The Environmental Control Officer (ECO):** the ECO is appointed by the developer as an independent monitor of the implementation of the EMPr i.e. independent of the developer and contractor. The ECO is responsible for providing feedback on potential environmental

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problems associated with the development. The ECO has the right to enter the site and do monitoring and auditing at any time, subject to compliance with health and safety requirements applicable to the site (e.g. wearing of protective head gear and safety boots). The ECO will be responsible for a minimum of monthly site audits, followed by an environmental control report, that will detail the status of environmental compliance, and highlight mitigation. The ECO will be responsible for liaising with authorities, MET. The ECO must submit monthly environmental audit reports to the authorities. The ECO must indicate the necessary corrective action measures to eliminate the cause of the non-conformances. The ECO is also responsible for liaising with contractors, informing them of any decisions that are taken concerning environmental management during the construction phase. This would also include informing the contractors of the necessary corrective actions to be taken.

- **Site Agent:** is usually a site engineer or project manager who is the developer's most senior representative on site and coordinates activities on site. The site agent must follow the advice of the ECO with regards to environmental management and ensure that the contractor abides by all requirements stipulated by the ECO.
- **Contractor:** the contractor as the developer's agent on site, is bound by the Clearance Certificate and EMPr conditions through his/her contract with the developer, and is responsible for ensuring that conditions of the EMPr are strictly adhered to at all times. The contractor must comply with all orders (whether verbal or written) given by the ECO, project manager or site agent in terms of the EMPr.
- **The Environmental Liaison Officer (ELO):** The Contractor shall submit to the Site Agent a nominated representative of the Contractor as an ELO to assist with day to day monitoring of the construction activities for the contract. Issues raised by the ECO will be routed to the ELO for the contractor's attention. The ELO shall be permanently on site during the construction phase to ensure daily environmental compliance with the EMPr. The ELO should preferably be a senior and respected member of the construction crew, as past experience has revealed that ELO's that can relate to the workforce are most effective for information transfer and ensuring compliance with the EMPr. The ELO will report directly to the ECO regarding environmental compliance. The site audits undertaken by the ECO will be undertaken alongside the ELO. The ECO will point out areas of concern, and the ELO will be responsible for ensuring day to day compliance with the EMPr. Should any emergencies arise the ELO will alert the ECO who will take action. There shall be an approved ELO on site at all times. Before the Contractor commences with each Construction Activity, the ELO shall give to the site agent a written statement setting out the following:
  - The type of construction activity.
  - Locality where the activity will take place.
  - Identification of impacts that might result from the activity.
  - Identification of activities or aspects that may cause an impact.
  - Methodology for impact prevention for each activity or aspect.
  - Emergency/disaster incident and reaction procedures (need to be demonstrated).
  - Treatment and continued maintenance of impacted environment.
- **Community Liaison Officer (CLO):** the contractor must appoint a CLO to act as a point of contact between the contracting team and the community that will be affected by the construction activities. Complaints from the community about construction activities must be channelled through the CLO. The CLO's responsibility is to liaise with the Interested and Affected Parties.

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## 5 ENVIRONMENTAL MANAGEMENT PROGRAMME (EMPr)

The following tables form the core of this EMPr for the current operational phase of the development. These tables should be used as a checklist on site. The aim of this EMPr is to derive measures that should be implemented during the current operational phase.

The purpose of the EMPr is to provide solutions to problems before they occur. If adhered to, this EMPr should limit corrective measures required during the current operational phase of the existing **SCRAP METAL** facility.

**Table 2: OPERATIONAL PHASE - Legal Compliance**

Statutory Requirement: Legal Compliance	
<b>PHASE:</b>	<b>Operational</b>
<b>IMPACT:</b>	<b>Compliance</b>
<b>TASK/ENVIRONMENTAL IMPACT:</b>	<b>Legal Compliance</b>
<b>OBJECTIVE:</b>	To comply with all the legal requirements for operations in Namibia.
<b>ACTION REQUIRED:</b>	➤ Ensure that the necessary permits from ministries and local authorities are available.
<b>TARGETS TO MONITOR COMPLIANCE AND REPORTING THERE ON:</b>	All permits, certificates and relevant documents on file. All record must be kept.
<b>RESPONSIBILITY:</b>	Owner and Administration Manager & Environmental Compliance Officer.
<b>TIME FRAME:</b>	Current operational phase.

**Table 3: OPERATIONAL PHASE - Environmental Clearance Certificate**

Statutory Requirement: Legal Compliance	
<b>PHASE:</b>	<b>Operational</b>
<b>IMPACT:</b>	<b>Compliance</b>
<b>TASK/ENVIRONMENTAL IMPACT:</b>	Environmental Clearance Certificate must be renewed every three years.
<b>OBJECTIVE:</b>	To maintain Environmental Clearance Certificate.
<b>ACTION REQUIRED:</b>	➤ Six monthly Environmental Inspection and report for three yearly renewal of Environmental Clearance Certificate
<b>TARGETS TO MONITOR COMPLIANCE AND REPORTING THERE ON:</b>	Valid Environmental Clearance Certificate on file.
<b>RESPONSIBILITY:</b>	Owner, Operational Manager and ECO
<b>TIME FRAME:</b>	Current operational phase and if any upgrades or construction take place on the existing Scrap metal facility.


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Table 4: OPERATIONAL PHASE - Socio-economic

Socio-economic: Job Opportunities and Economic Upliftment	
<b>PHASE:</b>	<b>Operational</b>
<b>IMPACT:</b>	<b>BENEFICIAL</b>
<b>TASK/ENVIRONMENTAL IMPACT:</b>	<b>Promotion of economic development through skills development.</b>
<b>OBJECTIVE:</b>	Advantages for local previously disadvantaged communities in terms of employment, empowerment and socio-economic upliftment.
<b>ACTION REQUIRED:</b>	<ul style="list-style-type: none"> <li>➤ Local labour (male and female, skilled and unskilled) should be employed as a priority.</li> <li>➤ Where possible, employment of local persons should be used for capacity building which will sustain economic development through training.</li> </ul>
<b>TARGETS TO MONITOR COMPLIANCE AND REPORTING THERE ON:</b>	Record of local workers employed. A yearly report on skills development and training should be compiled.
<b>RESPONSIBILITY:</b>	General Manager and Seena Legal consultants.
<b>TIME FRAME:</b>	Current operational phase

Table 5: OPERATIONAL PHASE - Socio-economic


Socio-economic: Job Opportunities and Economic Upliftment	
<b>PHASE:</b>	<b>Operational</b>
<b>IMPACT:</b>	<b>BENEFICIAL</b>
<b>TASK/ENVIRONMENTAL IMPACT:</b>	<b>Job Opportunities and Economic Upliftment</b>
<b>OBJECTIVE:</b>	Advantages for local previously disadvantaged communities in terms of employment, empowerment and socio-economic upliftment.
<b>ACTION REQUIRED:</b>	<ul style="list-style-type: none"> <li>➤ Indirectly, jobs are also created in industries that provide goods, materials and services.</li> <li>➤ The existing <b>SCRAP METAL</b> facility will increase skills development and also local employment in the area.</li> <li>➤ The development will lead to the increase in the number of convenience facilities in the primary market area.</li> </ul>
<b>TARGETS TO MONITOR COMPLIANCE AND REPORTING THERE ON:</b>	Record of local workers employed
<b>RESPONSIBILITY:</b>	Owner
<b>TIME FRAME:</b>	Current operational phase

**Table 6: OPERATIONAL PHASE - Socio-economic**

<b>Socio-economic:</b> Contribute to upgrading of existing infrastructure	
<b>PHASE:</b>	<b>Operational</b>
<b>IMPACT:</b>	<b>BENEFICIAL</b>
<b>TASK/ENVIRONMENTAL IMPACT:</b>	<b>Contribute to upgrading of existing infrastructure</b>
<b>OBJECTIVE:</b>	Improved municipal services
<b>ACTION REQUIRED:</b>	<ul style="list-style-type: none"> <li>➤ All recommendations made by the civil, traffic and electrical engineer and approved by the Municipality must be installed as per standard specifications.</li> </ul>
<b>TARGETS TO MONITOR COMPLIANCE AND REPORTING THERE ON:</b>	Implementation of infrastructure as per approved engineering plans
<b>RESPONSIBILITY:</b>	Owner, Operational Manager and ECO
<b>TIME FRAME:</b>	Current operational phase and if any upgrades or construction take place on the existing Scrap metal facility.

**Table 7: OPERATIONAL PHASE - Security and Surveillance**

<b>Security and Surveillance:</b> Control of access.	
<b>PHASE:</b>	<b>Operational.</b>
<b>IMPACT:</b>	<b>Security and Surveillance.</b>
<b>TASK/ENVIRONMENTAL IMPACT:</b>	<b>The control of access points (Gates and Doors) to Scrap Metal Sales to prevent unauthorized entry potentially causing injury to untrained people or theft or destruction of company property.</b>
<b>OBJECTIVE:</b>	<b>Control of access points (Gates and Doors) to Scrap Metal Sales.</b>
<b>ACTION REQUIRED:</b>	<ul style="list-style-type: none"> <li>➤ Staff training to ensure that no unauthorized entry will be permitted and persons wishing to enter the premises legitimately are escorted by a member of staff for their own safety and well-being.</li> <li>➤ Security procedures and measures to be reviewed yearly and any amendments to be communicated to management and employees.</li> </ul>
<b>TARGETS TO MONITOR COMPLIANCE AND REPORTING THERE ON:</b>	Video surveillance records to be downloaded and stored for security related incidents together with reports detailing the events.
<b>RESPONSIBILITY:</b>	Owner and Administration Manager & Environmental Compliance Officer.
<b>TIME FRAME:</b>	Current operational phase.

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**Table 8: OPERATIONAL PHASE – Bio-Physical: Exotic plant species**

<b>Bio-physical: Exotic plant species</b>	
<b>PHASE:</b>	<b>Operational</b>
<b>IMPACT:</b>	<b>BENEFICIAL</b>
<b>TASK/ENVIRONMENTAL IMPACT:</b>	<b>Removal of exotic plant species and establishment of indigenous vegetation.</b>
<b>OBJECTIVE:</b>	The removal of exotic plant species and the planting of indigenous vegetation within landscaped areas will increase biodiversity.
<b>ACTION REQUIRED:</b>	<ul style="list-style-type: none"> <li>➤ All classified Invader Species in terms of the Nature Conservation Ordinance Amendment Act, Act 5 of 1996 to be identified, eradicated and controlled.</li> <li>➤ The Landscape Development Plan must as far as reasonably practicable make use of indigenous trees and plants. The use of exotic species must be limited.</li> </ul>
<b>TARGETS TO MONITOR COMPLIANCE AND REPORTING THERE ON:</b>	Landscape Development Plan
<b>RESPONSIBILITY:</b>	Owner, Operational Manager and ECO.
<b>TIME FRAME:</b>	If any upgrades or construction take place on the existing <b>SCRAP METAL</b> facility: Design, planning, and construction phases

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**Table 9: OPERATIONAL PHASE – Legal Compliance: Visual Intrusion & Light Pollution**

Socio- economic: Visual Intrusion & Light Pollution	
<b>PHASE:</b>	<b>Operational</b>
<b>IMPACT:</b>	<b>ADVERSE</b>
<b>TASK/ENVIRONMENTAL IMPACT:</b>	<b>Visual Intrusion &amp; Light Pollution</b>
<b>OBJECTIVE:</b>	To mitigate the potential negative impact on "genius loci" and visual impact, should architecture not be in line with natural character of area, through the appropriate application of form, scale, materials and finishes
<b>ACTION REQUIRED:</b>	<ul style="list-style-type: none"> <li>➤ Light pollution should be minimized.</li> <li>➤ Lighting on site is to be sufficient for safety and security purposes, but shall not be and occupants of the shopping centre to neighbouring residents and the shopping centre, disturb wildlife, or interfere with road traffic.</li> <li>➤ Littering, rubbish and illegal dumping on the site is NOT allowed.</li> <li>➤ Refuse must be contained and disposed of at the Municipal land fill site.</li> <li>➤ Refuse bins must be provided. These must be sufficient in number and easily accessible.</li> <li>➤ The buildings may not be visually intrusive.</li> <li>➤ The buildings must be regularly painted.</li> <li>➤ All lights used for non-security purposes should be energy efficient for example compact fluorescent lights (CFL). Fluorescent lamps give five times the light and last up to 10 times as long as ordinary bulbs.</li> <li>➤ Outside lights will have to be downward shining (eyelid type), low wattage and should not be positioned higher than 1 m above the ground surface.</li> </ul>
<b>TARGETS TO MONITOR COMPLIANCE AND REPORTING THERE ON:</b>	No complaints from surrounding property owners
<b>RESPONSIBILITY:</b>	Owner, Operational Manager and ECO
<b>TIME FRAME:</b>	Planning and current operational phases

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**Table 10: OPERATIONAL PHASE – Legal Compliance: Traffic**

Socio- economic: Traffic	
<b>PHASE:</b>	<b>Operational</b>
<b>IMPACT:</b>	<b>ADVERSE</b>
<b>TASK/ENVIRONMENTAL IMPACT:</b>	<b>Traffic control</b>
<b>OBJECTIVE:</b>	Possible increased pedestrian hazard and increased road damage.
<b>ACTION REQUIRED:</b>	<ul style="list-style-type: none"> <li>➤ Signs must conform to the standards of Manual for Outdoor Advertising Control.</li> <li>➤ Areas that have been landscaped must be maintained.</li> <li>➤ It will be a Condition of the Zoning that a solid 3m high boundary wall be erected around the site, thereby screening the activities of the filling station from the adjoining sites.</li> <li>➤ Access to the site is from B1 Road. The proposed access arrangements are based on the standards contained in the "Guidelines for Access to Filling Stations (BB2 document)" (November 2003 - SA).</li> <li>➤ Road surfaces in the immediate vicinity of the site should be monitored. If the road is damaged the relevant authority must be notified</li> <li>➤ Advertising boards must not block the visibility of the B1 road to and from the existing <b>SCRAP METAL</b> facilities access road.</li> <li>➤ Access to and from the site must not have a negatively impact on the traffic on the B1.</li> <li>➤ All requirements by the Traffic engineer and Provincial and Local Traffic Department must be adhered to.</li> </ul>
<b>TARGETS TO MONITOR COMPLIANCE AND REPORTING THERE ON:</b>	No complaints from road users
<b>RESPONSIBILITY:</b>	Owner, Operational Manager, Safety Officer and ECO
<b>TIME FRAME:</b>	Planning, design and current operational phases

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**Table 11: OPERATIONAL PHASE – Legal Compliance: Noise**

Socio- economic: Noise	
<b>PHASE:</b>	<b>Operational</b>
<b>IMPACT:</b>	<b>ADVERSE</b>
<b>TASK/ENVIRONMENTAL IMPACT:</b>	<p><b>Noise:</b>                      Excessive noise in the workplace presents a risk of hearing damage and other health problems. The parts of the ear that process high frequency sounds are usually the First to be affected. The degree of hearing loss depends on the loudness of the noise and how long exposure is.                      Typical noise sources are Power tool operation and Hand tools (use of hammers on metallic surfaces).</p>
<b>OBJECTIVE:</b>	To minimize impact of noise on surrounding properties and environment
<b>ACTION REQUIRED:</b>	<ul style="list-style-type: none"> <li>➤ Noise levels shall be kept within acceptable limits, and forecourt staff must abide by National Noise Laws and local by-laws regarding noise.</li> <li>➤ Equipment such as mechanical equipment, extraction fans, refrigerators that are fitted with noise reduction facilities (e.g. side flaps, silencers etc.) must be used as per operating instructions and maintained properly.</li> <li>➤ Noise levels should comply with the SANS Code of Practice 10083-2013 (recommended noise levels). SANS 10083:2012 – The Measurement and Assessment of Occupational Noise for Hearing Conservation Purposes.</li> <li>➤ Employees operating Power tools and Hand tools like hammers that generate excessive noise should comply with Health and Safety standards that require them to wear ear protection.</li> <li>➤ Scrap Metal Sales must ensure that PPE is provided and training given how and when it should be worn.</li> </ul>
<b>TARGETS TO MONITOR COMPLIANCE AND REPORTING THERE ON:</b>	<p>No complaints from surrounding property residents.                      A complaints register Should be kept to log any complaints by the public and the complaints should be investigated and action taken if deemed necessary.</p>
<b>RESPONSIBILITY:</b>	Owner, Operational Manager, Safety Officer and ECO
<b>TIME FRAME:</b>	Current operational phases and if any upgrades or construction take place on the existing <b>SCRAP METAL</b> facility.

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**Table 12: OPERATIONAL PHASE – Legal Compliance: Dust**

Socio- economic: Noise	
<b>PHASE:</b>	<b>Operational</b>
<b>IMPACT:</b>	<b>ADVERSE</b>
<b>TASK/ENVIRONMENTAL IMPACT:</b>	<b>Dust:</b> Walvis Bay has seasonal winds which can cause excessive dust that can pose hazards to the public and industrial operations.
<b>OBJECTIVE:</b>	To minimize impact of noise on surrounding properties and environment
<b>ACTION REQUIRED:</b>	<ul style="list-style-type: none"> <li>➤ Operations involving handling and transport of scrap material must be avoided under high wind conditions or when a visible dust plume is present.</li> <li>➤ Staff working outside should be issued dust masks and goggles that will mitigate the effects.</li> </ul>
<b>TARGETS TO MONITOR COMPLIANCE AND REPORTING THERE ON:</b>	No complaints from surrounding property residents. A complaints register Should be kept to log any complaints by the public and the complaints should be investigated and action taken if deemed necessary.
<b>RESPONSIBILITY:</b>	Owner, Operational Manager, Safety Officer and ECO
<b>TIME FRAME:</b>	Current operational phases and if any upgrades or construction take place on the existing <b>SCRAP METAL</b> facility.

**Table 13: OPERATIONAL PHASE – Legal Compliance: Atmospheric Pollution & Odours**

Socio- economic: Atmospheric Pollution & Odours	
<b>PHASE:</b>	<b>Operational</b>
<b>IMPACT:</b>	<b>ADVERSE</b>
<b>TASK/ENVIRONMENTAL IMPACT:</b>	<b>Atmospheric Pollution &amp; Odours</b>
<b>OBJECTIVE:</b>	Minimize atmospheric pollution and odours
<b>ACTION REQUIRED:</b>	<ul style="list-style-type: none"> <li>➤ The emissions from an existing <b>SCRAP METAL</b> facility may have additional health risks.</li> <li>➤ Standard vents fitted to the breather pipes minimize the loss of vapours.</li> <li>➤ Emissions from the <b>SCRAP METAL</b> retail facility will be low level and thus disperse into the atmosphere.</li> <li>➤ The emissions from the existing <b>SCRAP METAL</b> facility would be dispersed according to the prevailing wind direction, with increased distance the concentration of the emitted particles will decrease.</li> <li>➤ All general waste areas are to be maintained in a neat and orderly manner and bins must have secure lids.</li> <li>➤ The existing <b>SCRAP METAL</b> facility must fully comply with the No. 5430 Government Gazette 27 March 2014 and No. 35 Regulations under the Tobacco Products Control Act, 2010</li> </ul>
<b>TARGETS TO MONITOR COMPLIANCE AND REPORTING THERE ON:</b>	No reports of negative health incidents or complaints from surrounding property residents
<b>RESPONSIBILITY:</b>	Owner, Operational Manager, Safety Officer and ECO
<b>TIME FRAME:</b>	Current operational phase and if any upgrades or construction take place on the existing <b>SCRAP METAL</b> facility.

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**Table 14: OPERATIONAL PHASE – Legal Compliance: Safety & Security.**

Socio- economic: Safety & Security	
<b>PHASE:</b>	<b>Operational</b>
<b>IMPACT:</b>	<b>ADVERSE</b>
<b>TASK/ENVIRONMENTAL IMPACT:</b>	<b>The control of access points (Gates and Doors) to Scrap Metal Sales to prevent unauthorized entry potentially causing injury to untrained people or theft or destruction of company property.</b>
<b>OBJECTIVE:</b>	Ensure safety and security of staff and users of the facility
<b>ACTION REQUIRED:</b>	<ul style="list-style-type: none"> <li>➤ Appropriate measures should be in place for the correct storage and handling of material as well as the procedures for dealing with dangerous situations.</li> <li>➤ Staff should be adequately trained with respect to dealing with crime.</li> <li>➤ Equipment and materials must be handled by staff that have been supervised and adequately trained.</li> <li>➤ Staff must be regularly updated about the safety procedures.</li> <li>➤ Emergency facilities must be available and adequately supplied for use by staff and customers.</li> <li>➤ Emergency contact details for the police, Security Company and fire department must be readily available.</li> <li>➤ Staff training to ensure that no unauthorized entry will be permitted and persons wishing to enter the premises legitimately are escorted by a member of staff for their own safety and well-being.</li> <li>➤ Security procedures and measures to be reviewed yearly and any amendments to be communicated to management and employees.</li> </ul>
<b>TARGETS TO MONITOR COMPLIANCE AND REPORTING THERE ON:</b>	Video and camera surveillance records to be downloaded and stored for security related incidents together with reports detailing the events.
<b>RESPONSIBILITY:</b>	Operational Manager and Safety Officer.
<b>TIME FRAME:</b>	Current operational phase and if any upgrades or construction take place on the existing <b>SCRAP METAL</b> facility.

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**Table 15: OPERATIONAL PHASE – Legal Compliance.**

Legal Compliance: Health and Safety	
<b>PHASE:</b>	<b>Operational</b>
<b>IMPACT:</b>	<b>ADVERSE</b>
<b>TASK/ENVIRONMENTAL IMPACT:</b>	<b>Legal Compliance - Health and Safety.</b>
<b>OBJECTIVE:</b>	<ul style="list-style-type: none"> <li>➢ The daily operations of Scrap Metal Sales pose various health and safety risks to people:                             <ul style="list-style-type: none"> <li><b>Loading &amp; Offloading/Sorting /Bailing</b> <ul style="list-style-type: none"> <li>• Operation of Forklifts and Trucks without training.</li> <li>• Employees working with no or incorrect PPE.</li> <li>• Manual handling injury of scrap material.</li> <li>• Trip and fall hazards.</li> </ul> </li> <li><b>Deconstruction/Flame Cutting</b> <ul style="list-style-type: none"> <li>• Operation of Power tools, gas flame cutters and hand tools without adequate training.</li> <li>• Fire hazards.</li> <li>• Trip and fall hazards.</li> <li>• Dust</li> <li>• Employees working with no or incorrect PPE.</li> <li>• Manual handling injury of scrap material.</li> <li>• Working in confined spaces.</li> <li>• Working at height.</li> </ul> </li> </ul> </li> </ul>
<b>ACTION REQUIRED:</b>	<ul style="list-style-type: none"> <li>➢ <b>Scrap Metal</b> Sales must ensure that employees are aware of the risks to health and safety to their well-being on site and <b>Scrap Metal</b> Sales must comply with the health and safety standards stated in the labour act.</li> <li>➢ The health and safety management system mitigation measure are:                             <ul style="list-style-type: none"> <li>• Vehicle and forklift operators must have the relevant licenses to operate such equipment with site specific training as well as pre-inspection checklists before operation of vehicles or forklifts.</li> <li>• Personal Protective Equipment is available and employees are trained in their proper use.</li> <li>• Training in proper lifting techniques to prevent manual handling injuries.</li> <li>• Good Housekeeping standards and procedures.</li> <li>• Training to mitigate trip and fall hazards</li> <li>• Employees operating the Bailing machine and Power tools to be trained in their proper and safe use.</li> <li>• Gas flame cutters to have training in the use of compressed gas and safe storage of compressed gas.</li> <li>• Ensure danger, warning, caution, notice and safety signs are on site where relevant.</li> <li>• First Aid kits are available on site.</li> </ul> </li> </ul>
<b>TARGETS TO MONITOR COMPLIANCE AND REPORTING THERE ON:</b>	<p><b>Scrap Metal</b> Sales must ensure Employees are identified and trained in First Aid and that emergency contact details are accessible and displayed on signage on every site.</p> <p>First Aid Kits to be made available on site.</p> <p>A register of incidents must be kept and should incident occur, then actions are taken to mitigate or eradicate these incidents from occurring.</p>
<b>RESPONSIBILITY:</b>	Operational Manager and Safety Officer.
<b>TIME FRAME:</b>	Current operational phase and if any upgrades or construction take place on the existing <b>SCRAP METAL</b> facility.

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**Table 16: OPERATIONAL PHASE – Bio-Physical: Risks of Fires & Explosions**

<b>Bio-Physical: Risks of Fires &amp; Explosions</b>	
<b>PHASE:</b>	<b>Operational</b>
<b>IMPACT:</b>	<b>ADVERSE</b>
<b>TASK/ENVIRONMENTAL IMPACT:</b>	<b>Risks of Fires &amp; Explosions</b>
<b>OBJECTIVE:</b>	Prevent emergency incidents
<b>ACTION REQUIRED:</b>	<ul style="list-style-type: none"> <li>➤ The design of the existing <b>SCRAP METAL</b> facility must conform to the following fire safety standards and legislation:                             <ul style="list-style-type: none"> <li>➤ Labour Act 11 of 2007</li> <li>➤ Local Authorities Fire Brigade Services Act, 2006 (Act No. 5 of 2006),</li> </ul> </li> <li>➤ The following signs must be installed in accordance with the Fire Department:                             <ul style="list-style-type: none"> <li>"NO SMOKING"</li> <li>"NO NAKED FLAME"</li> </ul> </li> <li>➤ Firefighting facilities must conform to the oil industry standard and be regularly inspected.</li> <li>➤ The existing <b>SCRAP METAL</b> facility management must develop an EMERGENCY PLAN. All staff must be adequately trained in the implementation of this plan.</li> </ul>
<b>TARGETS TO MONITOR COMPLIANCE AND REPORTING THERE ON:</b>	<ul style="list-style-type: none"> <li>➤ Approved Emergency Response Plan</li> <li>➤ Record of regular training of staff</li> <li>➤ Record of regular monitoring</li> </ul>
<b>RESPONSIBILITY:</b>	Owner, Operational Manager, Safety Officer and ECO
<b>TIME FRAME:</b>	Current operational phase and if any upgrades or construction take place on the existing facility.

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Table 17: OPERATIONAL PHASE – Bio-Physical: Risks of Fires & Explosions – *Continue*

Bio-Physical: Risks of Fires & Explosions	
<b>PHASE:</b>	<b>Operational</b>
<b>IMPACT:</b>	<b>ADVERSE</b>
<b>TASK/ENVIRONMENTAL IMPACT:</b>	<p>Fire and explosive hazards include compressed gas, combustible and flammable liquids and substances, and/or when hot work is performed.</p> <p>Fire and explosion can occur when the temperature has reached the flash point of the volatile material, and where there is sufficient vapour present in the atmosphere.</p> <p>Storage of these items present an inherent fire risk and operating procedures and safety measures should be in place to mitigate this hazard during operation and storage as human error mainly contributes to these hazards causing a fire and or explosion.</p>
<b>OBJECTIVE:</b>	Prevent emergency incidents
<b>ACTION REQUIRED:</b>	<p>To ensure the prevention or mitigation of these hazards the employer must:</p> <ul style="list-style-type: none"> <li>➤ Develop safe work procedures for fire and explosive hazards in the workplace, including storage, handling and operation of these items according to MSDS instructions and guidelines.</li> <li>➤ Regular site inspections to identify potential hazards.</li> <li>➤ Good maintenance and electrical components to prevent oil spillages or sparks that could lead to a fire hazard.</li> <li>➤ Good housekeeping practices to prevent accumulation of flammable material such as plastics, oily rags and wood.</li> <li>➤ Training of employees in the safe work procedures.</li> <li>➤ Employees are trained in identifying fire and explosive hazards, and are encouraged to report unsafe conditions so action can be taken immediately.</li> <li>➤ Ensure that workers comply with the safe work procedures.</li> <li>➤ Sufficient fire protection equipment and fire extinguishers are present in the workplace.</li> <li>➤ Regular inspection of Water Supply points and Fire Fighting Equipment.</li> <li>➤ Purging with effective removal methods are performed before any hot work begins on pipes or containers containing flammable substances.</li> <li>➤ Personnel working with flame Cutting equipment should be issued with the correct PPE.</li> <li>➤ Fire Evacuation Drills to be done yearly to ensure familiarity with access routes and muster points.</li> </ul>
<b>TARGETS TO MONITOR COMPLIANCE AND REPORTING THERE ON:</b>	<ul style="list-style-type: none"> <li>➤ Reporting should be recorded of all incidents.</li> <li>➤ Also, to be recorded are the dates when Fire Drills are practiced and when fire equipment was inspected and if needs be, replaced and water supply points tested.</li> </ul>
<b>RESPONSIBILITY:</b>	Operational Manager and Safety Officer.
<b>TIME FRAME:</b>	Current operational phase and if any upgrades or construction take place on the existing facility.

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**Table 18: OPERATIONAL PHASE – Bio-Physical: Waste Generation & Disposal**

Bio-Physical: Waste Generation & Disposal	
<b>PHASE:</b>	<b>Operational</b>
<b>IMPACT:</b>	<b>ADVERSE</b>
<b>TASK/ENVIRONMENTAL IMPACT:</b>	<b>Waste is created during operations and includes waste created from offices, industrial operations (scrap material including wood, plastics and contaminated soil) and waste bins. These wastes are to be collected and stored to be taken to an allocated waste disposal facility.</b>
<b>OBJECTIVE:</b>	Prevent pollution of ground & surface water and the environment as a whole
<b>ACTION REQUIRED:</b>	<ul style="list-style-type: none"> <li>➤ Waste collection and cleaning must be done on a regular basis to prevent hazards associated with pest control and fire. Waste that can be recycled must be separated to be taken to the appropriate recycling facility.</li> <li>➤ <b>Scrap Metal</b> Sales has identified waste collection points on site and placed suitable receptacles for waste collection.</li> <li>➤ Recycling and the provision of separate waste receptacles for different types of waste must be encouraged.</li> <li>➤ Waste that has been identified as hazardous (contaminated soils, hydrocarbon-soaked rags, filters etc.) should be separated and taken to a waste disposal facility to be disposed of appropriately.</li> <li>➤ Training of personnel to identify waste that is Hazardous, non-hazardous and what is recyclable.</li> <li>➤ Solid waste generated needs to be collected at a central point.</li> <li>➤ This waste will be disposed of as normal domestic waste at the closest municipal waste disposal site.</li> <li>➤ Waste management at the existing <b>SCRAP METAL</b> facility shall be strictly controlled and monitored. Only approved waste disposal methods shall be allowed.</li> <li>➤ NO burning, on-site burying or dumping of waste shall occur on site.</li> <li>➤ Hazardous waste will only be produced during emergency situations such as a spill that has been cleaned up with an absorbent material. This will be disposed of at a registered hazardous landfill site.</li> <li>➤ These materials may be removed by an appropriate hazardous waste Contractor. Proof of appropriate disposal must be obtained by the Contractor.</li> </ul>
<b>TARGETS TO MONITOR COMPLIANCE AND REPORTING THERE ON:</b>	Any hazardous waste that is disposed of must be recorded in a register, making record of the type of hazardous waste, the weight and the waste disposal facility that received it. Proof of receipt of the hazardous waste must be kept on file.
<b>RESPONSIBILITY:</b>	Operational Manager, Safety Officer and Waste removal contractor
<b>TIME FRAME:</b>	Current operational phase.

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**Table 19: OPERATIONAL PHASE – Bio-Physical: Contamination**

<b>Bio-Physical: Contamination</b>	
<b>PHASE:</b>	<b>Operational</b>
<b>IMPACT:</b>	<b>ADVERSE</b>
<b>TASK/ENVIRONMENTAL IMPACT:</b>	<p>Land can become contaminated due to releases of hazardous materials, wastes and oils. Releases of these materials may be the result of historic or current site activities, including accidents during their handling and storage, or due to poor management or disposal.</p> <p>Land is considered contaminated when it contains hazardous materials concentrations, including oil, above baseline and/or naturally occurring levels.</p> <p>Contaminated soils may involve topsoil's or subsurface soils that, through leaching and transport, may affect groundwater, surface water, and adjacent sites.</p> <p>Common spillage occurs due to mechanical breakdown in vehicles or transfer of oil or fuel from one receptacle to another.</p>
<b>OBJECTIVE:</b>	Prevent pollution of ground & surface water and the environment as a whole.
<b>ACTION REQUIRED:</b>	<ul style="list-style-type: none"> <li>➤ Soil contamination should be avoided by preventing or controlling the release of hazardous materials, hazardous wastes, or oil to the environment. When soil contamination is suspected or confirmed during operations, the cause of the ' uncontrolled release should be identified and corrected to avoid further releases and associated adverse impacts.</li> <li>➤ Create specially designated areas for vehicle, machinery and equipment maintenance.</li> <li>➤ Good maintenance and housekeeping practices will minimize the potential for spills to occur and the resulting rehabilitation of soil on site.</li> <li>➤ If hazardous spillage does occur it must be stopped and cleaned immediately.</li> <li>➤ Temporary hazardous storage and refuelling areas must be bounded with an impermeable liner to protect groundwater quality.</li> <li>➤ Temporary storage areas containing hazardous substances/ materials must be clearly signed. Staff handling hazardous substances/ materials must be aware of their potential impacts and follow appropriate safety measures.</li> </ul>
<b>TARGETS TO MONITOR COMPLIANCE AND REPORTING THERE ON:</b>	<p>Hazardous materials should be stored at demarcated areas taking into account health and safety requirements and MSDS requirements for handling and storage.</p> <p>A spill report must be kept recording what type of spill, the severity, the location and corrective action taken to mitigate the impact to the environment.</p> <p>Spill kits, drip trays, funnels and an adequate supply of absorbent must be available on site.</p>
<b>RESPONSIBILITY:</b>	General Manager / Environmental Compliance Officer.
<b>TIME FRAME:</b>	Current operational phase

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6 ADDENDUMS


**ADDENDUM A: ENVIRONMENTAL INCIDENT LOG**

<b>Date</b>	<b>Incident</b>	<b>Comments</b> (Include any possible explanations for current condition and possible responsible parties. Include photographs, records etc. if available)	<b>Mitigation Measure</b> (Give details and attach documentation as far as possible)	<b>ECO Signature</b>

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**ADDENDUM B: COMPLAINTS RECORD SHEET**

<b>RECORD OF COMPLAINTS</b>	<b>PAGE</b>	<b>OF</b>	<b>DATE:</b> / /
Complainant:			
Capacity of complainant:			
Complaint recorded by:			
Complaint:			
Corrective measure:			
ECO:	Date:		
Notes by ECO:			

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## ADDENDUM C: EMERGENCY RESPONSE

The operation of the existing **SCRAP METAL SALES** facility requires installation of equipment that will house and contain hazardous substances. At the same time, the transport of dangerous goods will form an integral part of the operation of such a development.

Accidents such as fire, explosion, spills or release of hazardous materials endanger life, property and the environment.

### Emergency Planning:


- Emergency procedures must be produced and communicated to all the employees on site. This will ensure that accidents are responded to appropriately and the impacts thereof are minimized. This will also ensure that potential liabilities and damage to life and the environment are avoided.
- Adequate emergency facilities must be provided for the treatment of any emergency on the site,
- The nearest emergency service provider must be identified during all phases of the project as well as its capacity and the magnitude of accidents it will be able to handle.
- Emergency contact numbers are to be displayed conspicuously at prominent locations around the construction site and the construction crew camps at all times.
- All employees must receive documented initial training and annual refresher training on the facility's Fire
- Emergency Plan and Evacuation Plan.

### Management of Fire Risks

- "No Smoking" and "No Open Flame" signs to be prominently displayed.
- The Risk Controller is responsible for ensuring that fire risks are surveyed, documented and assessed. Adequate numbers of the correct equipment have been installed.
- Equipment must comply with the Automatic Sprinkler inspection Bureau (ASIB), insurance and local Fire.
- Department requirements and recommendations. The Risk Controller must monitor and ensure that the standards are complied with.
- Departmental Managers are responsible for ensuring that the requirements of this standard are adhered to within their respective area of responsibility. They must ensure that equipment is operational, kept clean, not damaged and is refilled immediately after use.
- The maintenance, repair or replacement of any item of fire equipment is the responsibility of the Emergency coordinator, in liaison with departmental managers. Risk Controller to assist.

### Incident Reporting

- The contractor shall take corrective action to mitigate an incident appropriate to the nature and scale of the incident, immediately after the occurrence of the incident.
- Residual environmental damage that remains after having taken corrective action shall be rehabilitated,
- Change operating procedures where necessary to prevent recurrence of similar accident,
- Record all incidents on an Environmental Incident Report, within 24 hours of the incident occurring. Additional documents, including photos shall be appended to the incident report to provide a comprehensive record of the incident and the corrective and preventative action taken. Failure to do so shall result in a penalty.
- All incidents will be investigated in collaboration with the ECO. The focus of these investigations shall not be to apportion blame to specific employees, but to ascertain the root cause of the incident and to prevent a recurrence of similar incidents.

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## ADDENDUM D: SPILL CONTINGENCY

It is important that the responsible party shall adhere to National emergency response procedures. All officials of the responsible organ are required to adopt these standards that include spill and leak detection and management.

The Material Safety Data Sheets for the material and emergency response will be stored on site. The MSDS indicate the relevant actions to be taken should certain incidents (spills/exposure) occur with raw materials/products.

### Customer Spill and Leak Procedure

The avoidance of spills and leaks is especially important from a safety and legal point of view. Spills or leaks can be dangerous as they can cause a fire or explosion and may involve high cleaning costs when natural resources are contaminated. Within your premises you are responsible for environmental control and must ensure that pollution is avoided at all times. If the Control Procedures are used properly, it will be possible to detect a leak at an early stage. Damage to the environment and cleaning costs will then be minimized.

### Spill and Leak Prevention


- All personnel who have anything to do with fuel or oil use systems should know their individual responsibilities for controlling and/or reducing pollution. Employees should be well informed and apply the appropriate techniques.
- All employees involved in spillages and leaks must be informed about the spill/leak emergency response plan and must know how to act in the event of a spillage or leak.
- Equipment installed or used to avoid pollution should be operated efficiently and well maintained,
- Spill clean-up equipment, like absorbing fibres (Drizit), squeegees, sandbags, etc. should be located in a clean, dry and easily accessible storage facility.
- Spill fighting material should be kept near places where spills and leaks are most likely to occur.

### The proposed procedure:

- Place two 200-liter waste bins at each area.
- One bin to be used for storage of unused fibres (e.g. unused Drizit) and one bin to be used for receiving the used fibres (e.g. used Drizit).
- Apply the fibres (Drizit) as per the instructions as soon as the spill occurs. Used fibres (Drizit) should be disposed of in an environmentally friendly way by either burning or dispatching to a class 1 waste dump, using companies such as Waste-tech.
- Ensure that Emergency Spill/Leak Response Plans and the necessary associated equipment are
- appropriate for your operation and are the subject of regular exercises, where possible in conjunction with the industry and/or local authorities.
- Provide regular training for key response employees in dealing with emergencies.

### Spill Response

It is not possible to give detailed recommendations on how to clean up specific kinds of spillages as the method and materials used will depend on the type of product handled, the amount involved, the wind, weather, equipment available, etc. However, all spills, minor or major, should be cleaned up as soon as they occur. Whatever the spill, there are five basic steps in dealing with spillages:

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- Limit the spillage;
- Contain the spillage;
- Remove the spilled product;
- Final clean up and soil rehabilitation; and
- Complete spillage report.

Containment of the oil near the point of spillage localizes the problem, minimizes pollution and makes it easier to remove the pollution. Cleaning of the spill depends on whether there is a major spill and whether there is a spill on paving or on soil. A major spill is any spill where more than 200 litres of product is involved.

**Minor Spills**

Minor spills (less than 200 litres) should be treated as follows:

Soak up the spill with unused fibres (e.g. unused Drizit) from the waste bin. If the spill has soaked into the ground, the soil should be ploughed to allow aeration. Water can then be used to bring the oil spill to the surface and mopped up immediately with absorbent fibres (Drizit). Collect the used fibres (used Drizit) in the bin for used fibres.

**Major Spills**

Spills less than 200 litres but threatening to streams, rivers, water supply, etc. and incidents of lesser magnitude that have or might attract public, press or authoritative attention have to be considered as major spills. Major spills of oil or fuel on paving or non-permeable surfaces should be treated as follows:

- Wherever possible, try to limit the spillage by turning off all activities that caused the spill, i.e. closing a valve that has been accidentally opened, plugging the hole where the product is leaking or stop pumping in to a tank or vehicle.
- Contain spill immediately with absorbing fibres (e.g. Drizit), sandbags, sand or soil.
- Prevent any of the spilled oil substances from entering your drain, storm water systems, septic tanks or from contaminating any natural water systems by forming a barrier from soil, sand, sandbags or absorbing materials. If any of the spill should enter the storm water system, the flow must be intercepted before it can contaminate other environments.
- If natural water systems are contaminated, use straw bales, absorbent booms and sandbag dams for containment and absorption.
- Mop up as much of the spillage as possible by using absorbing materials,
- Contact your field manager and ask for support.

**Major spillage of oil or fuel on soil or permeable surface should be treated as follows:**

- Wherever possible, limit the spillage by turning off all activities that causes the spill.
- Contain the spill and prevent spread of the substance by using sandbags, sand or soil, absorbent booms or planking to divert flow.
- Prevent any of the oil substances from entering your drains, storm water systems or septic tanks, or from contaminating any natural water systems by forming a barrier from soil, sand, sandbags or absorbing materials.
- Prevent any of the oil substances from contaminating groundwater. It may be necessary to remove contaminated soil for disposal or rehabilitation.

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- Remove or mop up as much of the spill as possible by using spill fighting materials. Water the soil to bring oil to the surface and "mop up" with absorbent material such as Drizit.
- Plough soil for aeration and apply fertilizer/suitable neutralizing chemicals if viable (not detergents).
- All contaminated spill prevention material (such as fibres, Drizit, soils, sandbags etc.) have to be disposed of in an environmentally acceptable way, e.g. by using Waste-tech.

**Spill Reporting**

The MET, external auditor and local protection services should be notified whenever:

- A spill in excess of 200 litres occurs.
- For every major spill (over 200 litres of product) that occurs, the Incident Report Form must be completed. Investigate spill cause and implement recommendations for preventing re-occurrence.
- If watercourses and ground water are contaminated, then the MET and Namwater must be notified.

**Customer Inspection**

Site operating staff should check regularly if all systems and equipment are in good condition. A spillage resulting from malfunctioning equipment might be prevented. Inform fuel supplier when tank systems, pipe-work or equipment need maintenance.


**Leak Reporting Procedure**

- Notify the supplier immediately of any suspected leaks or malfunctioning of equipment.
- Any loss or suspected loss must be confirmed in writing.
- For every suspected leak the Incident Report Form has to be completed.
- Investigate leak and implement recommendations for preventing reoccurrence.

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**ADDENDUM E: COMPANY DOCUMENTATION**

POL 93



**NAMIBIAN POLICE**  
**CERTIFICATE**  
**(SECOND HAND GOODS ACT, 1998 (ACT NO. 23 OF 1998))**

Certificate Number ERO S 0001/01/2017

It is hereby certified that SCRAP METAL SALES CC  
(Name of Business)

has been registered as a dealer/pawnbroker\*

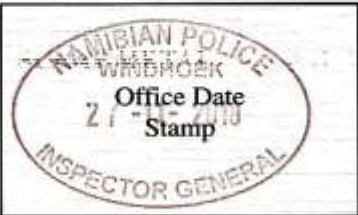
Business Address 251 HIDIPO HAMUTENYA ROAD, INDUSTRIAL AREA, WALVI  
Postal Address P O BOX 129, WALVIS BAY

The business is authorised to deal in the following classes of goods:

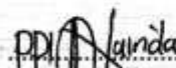
SCRAP METAL

Other .....


This certificate shall expire on 2022-1-25



NAMIBIAN POLICE  
WINDHOEK  
Office Date Stamp  
27-10-2020  
INSPECTOR GENERAL

  
 LT-GENERAL  
 Inspector-General: Namibian Police  
 S.H. NDEITUNGA

\* Delete whichever in not applicable

Date: 10 <sup>th</sup> of October 2020	Company: SCRAP METAL SALES CC	Occupational Hygienist Johan Cornelissen 	Project No: 2020/195/1
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Form EEC 15



REPUBLIC OF NAMIBIA

**EMPLOYMENT EQUITY COMMISSION  
AFFIRMATIVE ACTION (EMPLOYMENT) ACT, 1998**

**AFFIRMATIVE ACTION COMPLIANCE CERTIFICATE**  
(Section 41)

It is hereby certified that the Affirmative Action Plan of

**Scrap Metal Sales CC**

*(Name of relevant employer)*

dated: **02 October 2019**

complies with the requirements of the Affirmative Action (Employment) Act, 1998.

This certificate is valid until the date:

1. Subject to sub-paragraph (3), that the Commission under section 32(1)(a), 34(3) or 39(7) of the Act, as the case may be, issues to the relevant employer concerned an affirmative action compliance certificate for the very next affirmative action report following on the affirmative action report for which such compliance certificate had been issued;
2. subject to sub-paragraph (3), that the review panel makes under sections 39(1)(b) or (3)(b) of the Act a final order disapproving the very next affirmative action report following on the affirmative action report for which such compliance certificate had been issued; or
3. that the relevant employer concerned fails to submit a further affirmative action report under the provisions of section 27(2) of the Act.

*Commissioner: Employment Equity Commission*

**02 October 2019**

*Date*



*Official Stamp*

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REPUBLIC OF NAMIBIA  
CLOSE CORPORATIONS ACT, 1988  
(Section 13, 14, 27 and 60)  
(Regulations 3, 10 and 13)

(To be lodged in triplicate together with the Founding Statement)

**Certificate of Incorporation**

REGISTRATION NUMBER OF CORPORATION
CC / 96/500

This is to certify that the Founding Statement (CC 1) of

Scrap Metal Sales CC

has been registered and the above-named close corporation was this day incorporated in terms of the Close Corporation Act, 1988.

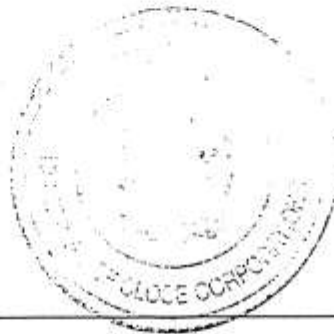
\* The above-named corporation has been converted from a company:

\_\_\_\_\_ (Reg. No. \_\_\_\_\_)


Signed at Windhoek this 29<sup>th</sup> day of May

One Thousand Nine Hundred and Ninety Six

  
REGISTRAR OF CLOSE CORPORATIONS



\* (Delete if not applicable)

Date: 10 <sup>th</sup> of October 2020	Company: SCRAP METAL SALES CC	Occupational Hygienist Johan Cornelissen 	Project No: 2020/195/1
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REPUBLIC OF NAMIBIA  
**CLOSE CORPORATIONS ACT, 1988**  
 (Sections 12, 13, 14, 24, 27, 29, 47 and 60)  
 (Regulations 2, 3 and 13)

*[Handwritten Signature]* **CC 2**

**Amended Founding Statement**

Before filling in the form, first see notes on page 2.

REGISTRATION NUMBER OF CORPORATION <b>CC/96/500</b>
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MINISTRY OF INDUSTRIALISATION,  
 TRADE AND DEVELOPMENT  
 PO Box 21214 Windhoek  
**03 MAY 2017**

**PART A**

	Dates of commencement of change
Full name of corporation <b>SCRAP METAL SALES CC</b>	*
Previous name of corporation (if applicable)* <b>N/A</b>	*
Literal translation of name (if applicable)* <b>N/A</b>	*
Shortened form of name (if applicable)* <b>N/A</b>	*
Description of principal business* <b>SELLING OF SCRAP METAL</b>	*
Date of end of financial year* <b>LAST DAY OF APRIL</b>	*

**PART B**

Postal address* <b>P.O. BOX 2921, WALVIS BAY, NAMIBIA</b>	* 2017-05-05
Address of registered office (not post office box)* <b>211 NANGOLO MBUMBA DRIVE, WALVIS BAY, NAMIBIA</b>	*
Name and address of accounting officer* <b>MULYNS, 211 NANGOLO MBUMBA DRIVE, WALVIS BAY, NAMIBIA</b>	*

(Attach written consent to appointment)

Full name of association or body of which accounting officer is a member **INSTITUTE OF CHARTERED ACCOUNTANTS OF NAMIBIA**

Membership/Practice No. **20502**

\* See note 2 on page 2

**CC 2**

Date: 10 <sup>th</sup> of October 2020	Company: SCRAP METAL SALES CC	Occupational Hygienist Johan Cornelissen <i>[Signature]</i>	Project No: 2020/195/1
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**Walvis Bay**



**Municipality**

**REGISTRATION CERTIFICATE NO. 2011/2721**

**SCRAP METAL SALES CC**

is registered to carry on business as a

**SCRAP METAL AND MATERIAL DEALER**

in accordance with the Local Authority Act 2000 (Act 29 of 2000) and the General Health Regulations 1969 (GN121 of 1969)  
Under the following conditions


Name of Owner: CASPER DERKS  
 Name of Manager: CASPER DERKS  
 Business Address: P O BOX 129, WALVIS BAY, NAMIBIA, 13013  
 Street Address: 251, HIDIPO HAMUTENYA ROAD, WALVIS BAY  
 Erf No: W2619

Receipt No.:  
**MUNICIPALITY OF WALVIS BAY**  
**BUSINESS REGISTRATION OFFICE**  
 19 AUG 2020  
*D. DANIEL*  
**ENVIRONMENTAL HEALTH SECTION**  
**REGISTRATION OFFICER**  
 PRIVATE BAG 5077 TEL. 064 2013288

Date of Registration:  
2020/08/10

Expiry Date:  
2021/08/09

Please note: This certificate does not exempt the holder of obtaining a permit or any other document which may be required by law imposed by other ministries. Any alteration of this certificate without the approval of the Registration Authority constitutes a criminal offence.

Date: 10 <sup>th</sup> of October 2020	Company: SCRAP METAL SALES CC	Occupational Hygienist Johan Cornelissen 	Project No: 2020/195/1
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# Municipality of Swakopmund

4104517

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## REGISTRATION CERTIFICATE

No 1211/2020

### Scrap Metal Sales CC

is hereby registered to trade as a

**General Dealer  
Dealer in Scrap Metal & Secondhand Goods**

NAME OF OWNER/MANAGER : C Derks  
 BUSINESS ADDRESS : PO Box 129  
 Walvis Bay  
 ERF NO : 4057  
 STREET ADDRESS : Rokatoka Str

**THIS CERTIFICATE EXPIRES ON 31 MARCH 2021**



DATE

GENERAL MANAGER HEALTH

**N.B.:** *This certificate does not exempt the holder from obtaining any other documents, which are required by law (Including requirements contained in the Town Planning Regulations)*

Date: 10 <sup>th</sup> of October 2020	Company: SCRAP METAL SALES CC	Occupational Hygienist Johan Cornelissen	Project No: 2020/195/1
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