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ENVIRONMENTAL MANAGEMENT PLAN (EMP)

Photo for illustration only (Karibib Police Station)

ENVIRONMENTAL IMPACT ASSESSMENT (EIA) AND ENVIRONMENTAL MANAGEMENT PLAN (EMP) FOR A DIESEL DEPOT (92 CUBIC), ON ERF 163, LAFRENZ, WINDHOEK

PROPONENT **OCEAN BUNKER PETROLEUM SERVICES**

October 2020

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DOCUMENT INFORMATION		
Title	Environmental Management Plan (EMP) for a Diesel Depot (92 cubic) on Erf 163, Lafrenz, Windhoek	
ECC Application Reference number	APP - 001941	
Listed Activity	Activity 9.4 Storage and Handling of Dangerous Good The storage and handling of a dangerous goods, including petrol, diesel, liquid petroleum gas or paraffin, in containers with a combined capacity of **more than 30 cubic meters** at any location	
Location	Erf 163, Lafrenz, Windhoek	
Proponent	Ocean Bunker Petroleum Services Contact person: Charlet P.O. Box 98414 Pelican Square, Windhoek Tel: +264 Mobile: +264 813754566 E-mail: breezyinvest@gmail.com	
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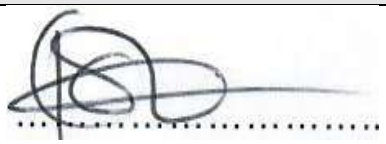
Mr. Ipeinge Mundjulu (EAP)[1]		08 October 2020
Reviewer: Mr. Jonas Heita (EAP)		12 October 2020
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1 EAP – Environmental Assessment Practitioner

ACRONYMS

BID	Background Information Document
DEA	Department of Environmental Affairs
DSR	Draft Scoping Report
EA	Environmental Assessment
EAP	Environmental Assessment Practitioner
ECC	Environmental Clearance Certificate
ECO	Environmental Compliance Officer
EIA	Environmental Impact Assessment
EMA	Environmental Management Act (No. 7 of 2007)
EMP	Environmental Management Plan
I&APs	Interested and Affected Parties
MEFT	Ministry of Environment, Forestry and Tourism
PPE	Personal Protective Equipment
SM	Site Manager
TEC	Tortoise Environmental Consultants

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1. INTRODUCTION

1.1. ECC Application

Ocean Bunker Petroleum Services hereby submit an application for an Environmental Clearance Certificate (ECC) for the proposed construction of a Diesel Depot (92 cubic).

The proposed fuel storage facility (diesel depot) is located on Erf. 163, Lafrenz, Windhoek (figure 2.1).

GPS coordinates: Latitude: -22.50856817 & Longitude: 17.06715641

1.2. Environmental versus Economic Development

Namibia's economy is highly dependent on a healthy environment and striking a balance in meeting demands for economic development (e.g fuel storage facility) and maintaining biological diversity can be a challenge. Therefore, it is of utmost importance that the environment and development sectors should work together and identify synergies.

Development takes place on land (in the environment) and hence the quest for economic development requires a trade-off with certain parts of the environment in-order for the development to be realized. Meaning, for development to take place, some part of the environment will be affected. However, it is of utmost importance that such impacts are mitigated through the EMP.

The aim of environmental assessments is to guide the proposed fuel storage facility (diesel depot) and to mitigate potential negative impacts that may arise (e.g soil and ground water pollution).

1.3. Environmental management plan (EMP) Context

This document constitutes the Environmental Management Plan (EMP) for the continuation of the fuel storage facility for Ocean Bunker Petroleum Services

1.4. What is an EMP?

The Environmental Management Plan (EMP) is a tool used to mitigate potential environmental risks associated with the proposed project / activity, and provides a risk management strategy and logical framework for implementation of the proposed fuel storage facility activities, in order to mitigate potential environmental and social impacts identified during the EIA process, in

accordance with the provisions of the Environmental Management Act (Act No.7 of 2007), EIA Regulations of 2012 and any other relevant / applicable legislation.

As a result, the EMP recommends mitigation measures in order to ensure that the recommended fuel storage facility activities and associated activities are conducted in an environmental friendly manner, and in accordance with the provisions of the Environmental Management Act and EIA regulations

Furthermore, the EMP outlines specific roles and responsibilities for role-players against which they can be evaluated and non-compliance is punishable.

1.5. Purpose of the EMP

The purpose of the EMP is to identify potential environmental and social impacts associated with the fuel storage facility activities, in-order to ensure compliance to the EMA.

The aim of the EMP is to ensure that the activities undertaken during the renewal of the fuel storage facility activities are conducted in accordance with the following:

i. Environmental Management Act (No. 7 of 2007),
ii. EIA regulations of 2012 (GN: 30), and
iii. Best environmental practices (benchmarks)
iv. Any other applicable legislation *(as presented in Table 3.1 to 3.3)*

The EMP provides environmental guidelines to be followed throughout the lifespan of the fuel storage facility activities and comprise of the following:

a) Environmental Aspects,
b) Management Objective,
c) Mitigation Measures / Actions Required,
d) Monitoring Indicators, and
e) Party Responsible

1.6. Objective

The objective of the EMP is to prevent / minimize (where possible), unacceptable and adverse environmental, social or economic impacts that may arise from the proposed development. Overall, the EMP aims to minimise negative impact/s (real, potential or perceived) that may result from the proposed fuel storage facility activities.

1.7. EMP Scope

The EMP does not only focus, and it is not limited to the fuel storage facility fuel storage facility , but it includes the bigger picture, and serve as the guiding tool to protecting the natural, bio-physical and socio-economic environment on both the specific site and the surrounding area. The bigger picture is important because, some impacts may not be confined to the margins of the fuel storage facility .

1.8. Possible adjustments to the EMP

The EMP is an open-ended document and maybe considered inconclusive. In other words, the EMP should allow room for adjustments if new information becomes available at a later stage, in which new / additional mitigation measures may become necessary.

The necessity of possible adjustments to the EMP at a later stage may be attributed to:

a) Lack of information at the time of drafting the initial EMP,
b) Evolution or addition of new activities, or
c) Unintended omission of potential impacts during the initial EIA scoping exercise and development of the initial EMP.
d) Development of industry best practice.

This implies that, in-addition to the information contained herein, any other relevant information that may surface during the construction operations, through internal monitoring or auditing by the Environmental Compliance Officers (ECOs), can be added to the EMP (evolution of activities), and such changes or inclusions will be binding to the proponent and all contractors / sub-contractors.

1.9. Implementation Framework and Accountability to the EMP

For effective implementation of the EMP, the Institutional roles are presented below. However, the specific roles and responsibilities are defined and broken down as presented in Sections 4 and 5, respectively.

Table 1-1: Role players, Institutional Framework

Role-player	Company / Institution	Role
Proponent	Ocean Bunker Petroleum Services	Compliance to the EMP
Environmental Consultant	Tortoise Environmental Consultants (TEC)	Development of the EMP
Environmental Compliance Officer/s (ECO)	Ministry of Environment &Tourism (MET) – Department of Environmental Affairs (DEA)	Monitoring Compliance to EMP: ➢ Un-announced spot checks, ➢ Corrective measures, warning, penalties / fines, license suspension, etc
Public	Interested and affected parties (I&APs)	Report to the ECOs, any activity of environmental concern (e.g Pollution, safety risks, etc)

2. PROJECT INFORMATION

2.1 Project Location

The fuel storage facility fuel storage facility is located within the town boundaries, (figure 2.1).

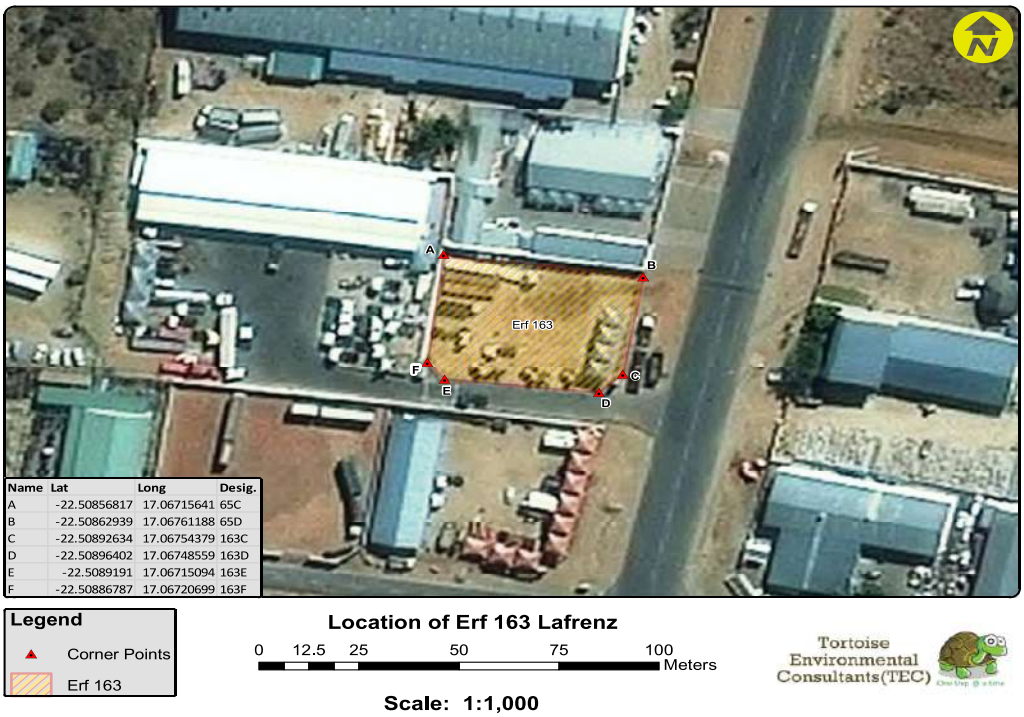


Figure 2-1: Zoomed view of the proposed fuel storage facility site

Figure 2-2: Existing infrastructure of the proposed diesel depot, Erf 163, Lafrenz, Windhoek

2.2 Site Layout

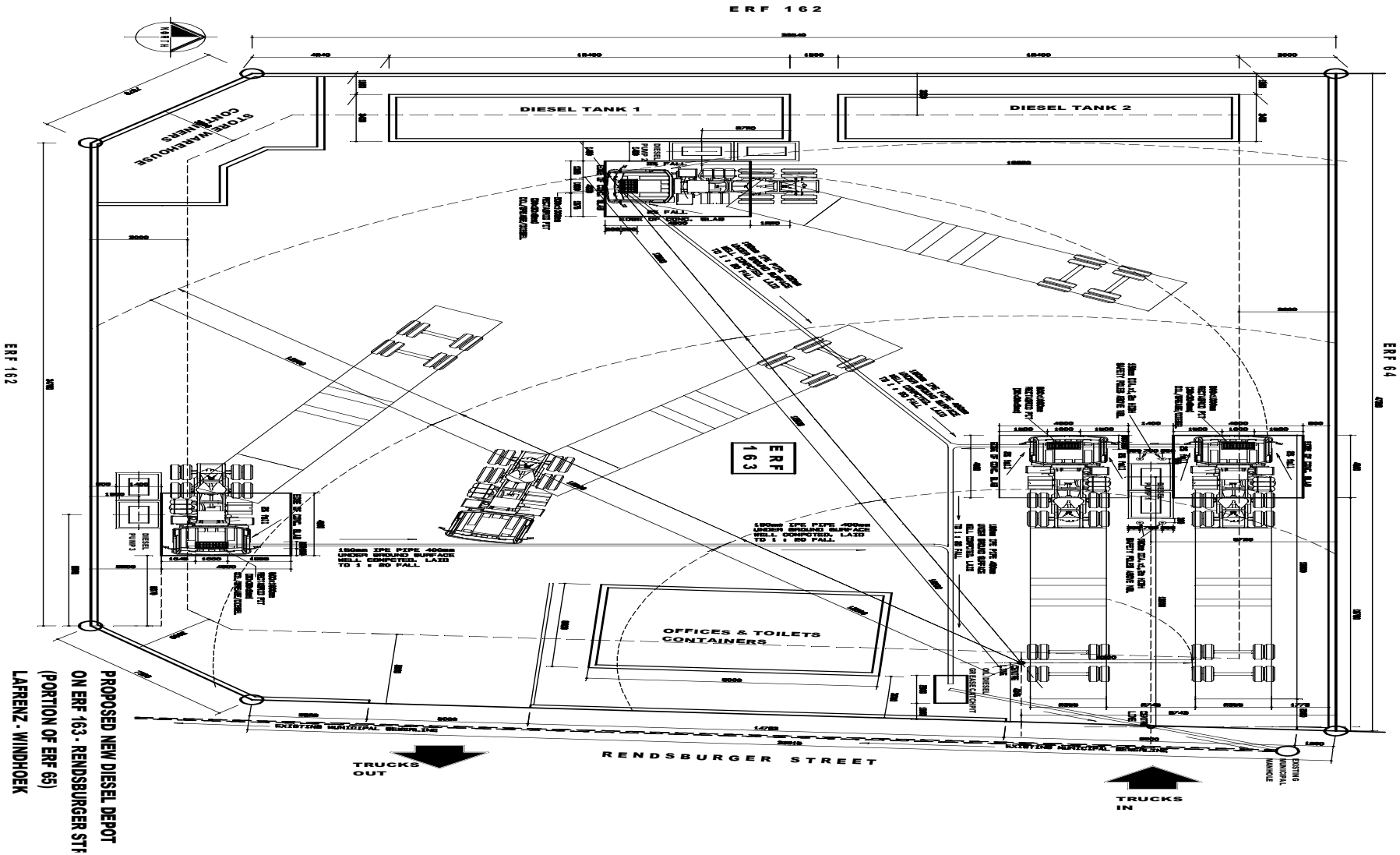
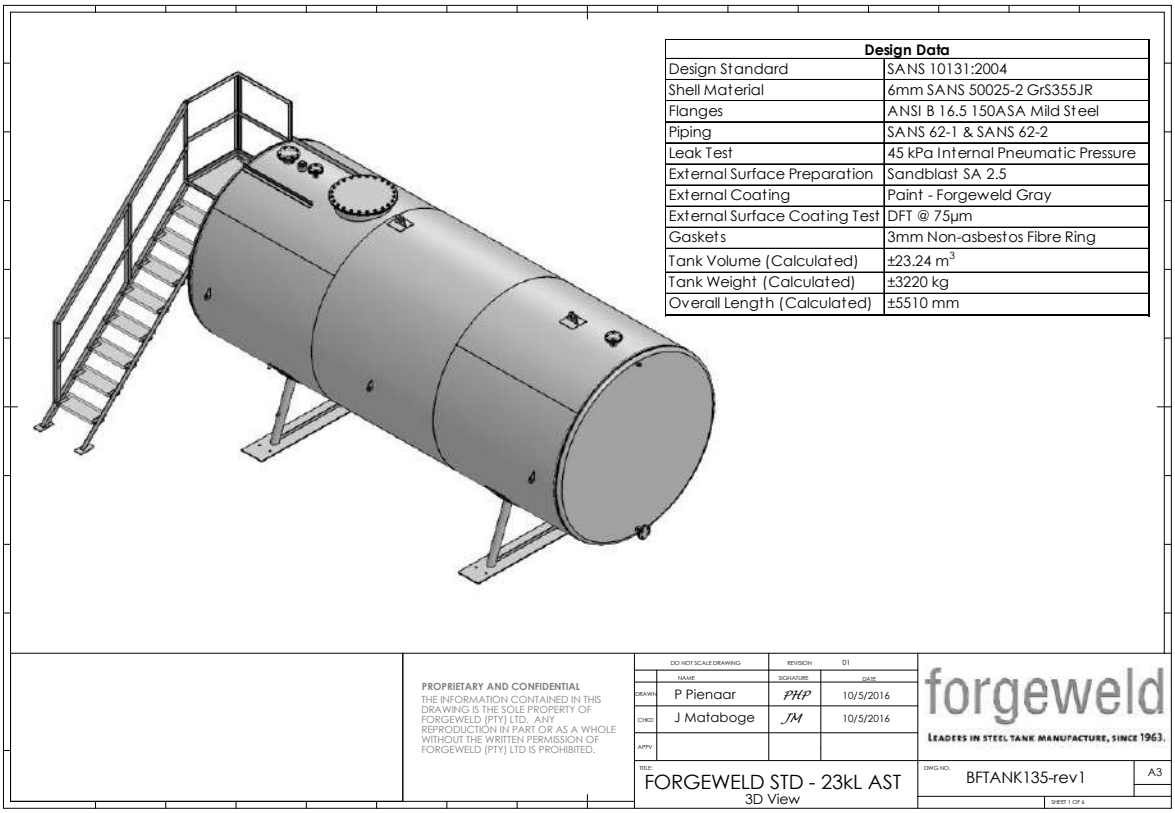


Figure 2-3: Site Layout for Diesel depot, Erf 163, Lafrenz, Windhoek

2.3 Proposed Tank Design



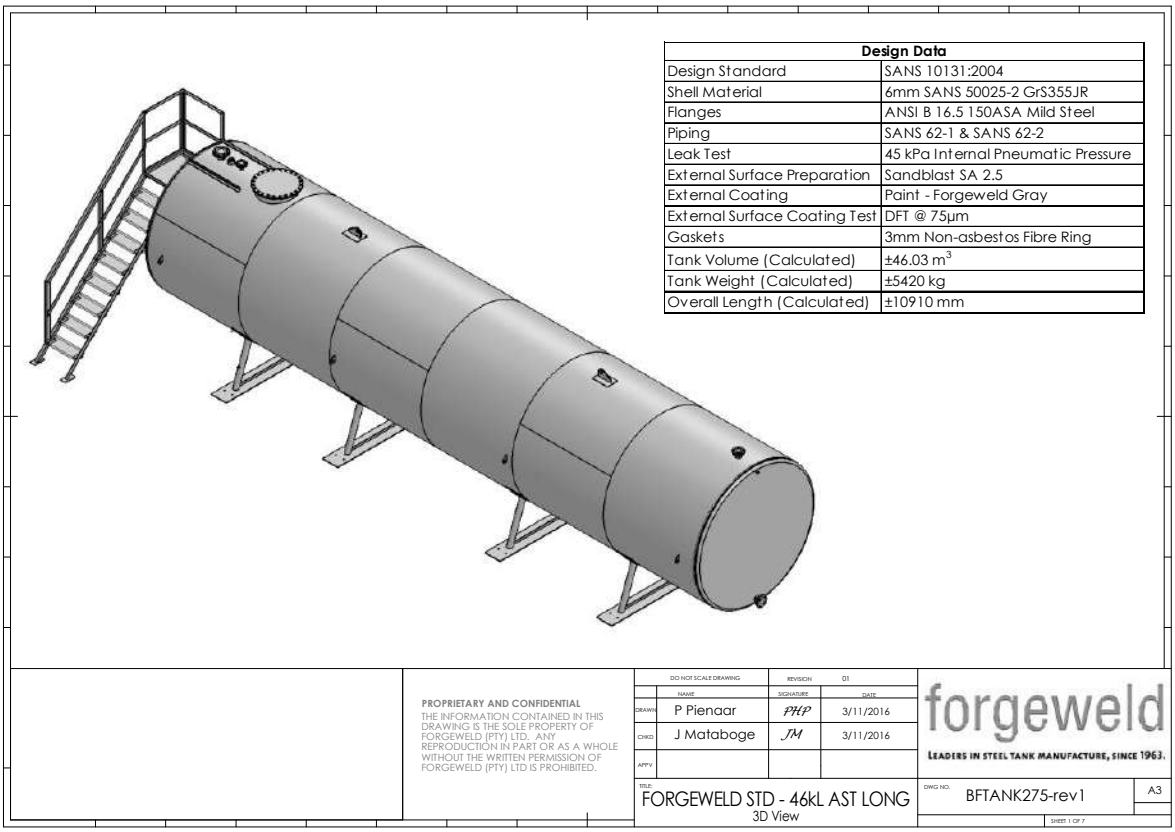


Figure 2-4: Proposed Tank Design for the Diesel depot, Erf 163, Lafrenz, Windhoek

3. COMPLIANCE AND LEGAL FRAMEWORK

This chapter outlines the regulatory framework applicable to the proposed project. Table 2 provides an overview of applicable policies, plans and strategies and Table 3.1 provides a list of applicable legislation in Namibia.

3.1 Compliance to the EMP

The EMP is binding to the proponent, and all contractors / sub-contractors. This implies that each and every entity that may have any kind of engagement or involved in / with the activities of the renewal of the fuel storage facility activities should comply with the EMP throughout the project lifespan. Non-compliance may have serious consequences e.g License withdrawal.

3.2 Environmental Management Act (No.7 of 2007)

Section 27 of the Environmental Management Act 2007 (Act No. 7 of 2007) (EMA) provides a list of activities that may not be undertaken without an Environmental Clearance Certificate (ECC) (herein referred to as: listed activities). The proposed expansion of the hospital triggers the following listed activities.

The EMP should conform to the provisions of the Environmental Management Act (EMA), Act No. 7 of 2007 and EIA regulations of 2012 (Government Notice: 30).

The EIA Regulations defines a '*Management Plan*' as:

"…a plan that describes how activities that may have significant impacts on the environment are to be mitigated controlled and monitored."

3.3 EMP Requirements

Table 3-1: EMP Requirements as outlined in Section 8 of the EIA Regulations

Requirement
(j) a draft management plan, which includes – *(aa) information on any proposed management, mitigation, protection or remedial measures to be undertaken to address the effects on the environment that have been identified including objectives in respect of the rehabilitation of the environment and closure;*

(bb) as far as is reasonably practicable, measures to rehabilitate the environment affected by the undertaking of the activity or specified activity to its natural or predetermined state or to a land use which conforms to the generally accepted principle of sustainable development; and

(cc) a description of the manner in which the applicant intends to modify, remedy, control or stop any action, activity or process which causes pollution or environmental degradation remedy the cause of pollution or degradation and migration of pollutants.

3.4 Listed Activities

Listed Activities may not be undertaken without an Environmental Clearance Certificate (ECC), and hence an Environmental Impact Assessment (EIA) is required.

In terms of the Environmental Management Act of 2007 (Act No. 7 of 2007) and the Environmental Impact Assessment Regulation (Government Notice No. 30 of 2012), the proposed project triggers the following listed activities that may not be undertaken without an Environmental Clearance Certificate hence the need for an EIA Scoping Exercise.

Table 1: List of activities in the EIA regulation concerning the proposed project.

Activity	Description of the Activity	Operation of the Activity
Activity 9.4 Storage and Handling of Dangerous Good	The storage and handling of a dangerous goods, including petrol, diesel, liquid petroleum gas or paraffin, in containers with a combined capacity of more than 30 cubic meters at any location.	The project entails the handling and storage of dangerous good.

Given the above listed activities, the EIA process shall be undertaken to assess and determine the possible environmental, social and economic impacts that this project may arise from this project.

3.5 Extended developmental and Legal Framework

In addition to the EMA and the Environmental Assessment Policy, there exists a host of legal and policy documents and guidelines that must be considered when undertaking an EIA as indicated in table 3.2, below. The proponent has the

responsibility to ensure that the fuel storage facility operations conforms to all other National developmental plans and legal framework.

Table 3-2: Policies, Plans and Strategies

Policy / Plan	Relevance	Applicability to the Proposed Project
5th National Development Plan (NDP) and Vision 2030	Outlines the country's National Development Plans (NDPs), in line with the Harambee Prosperity Plan (HPP) and vision 2030	The proposed project is a development that forms part of the bigger picture of achieving economic progression, social transformation and environmental sustainability. Agriculture as a pillar for social well-being, through food production, household income and improved livelihoods

Table 3.2: Other Legal Instruments / National Statutes

National Statutes	Relevance	Applicability to the Proposed Project
Environmental Assessment Policy (1995)	Promotes Sustainable development and Environmental Conservation emphasize the importance of environmental assessments as a key tool towards environmental sustainability	Environmental Protection
Soil Conservation, 1969 (Act 76 of 1969) and the Soil Conservation Amendment Act (Act 38 of 1971)	Makes provision for the prevention and control of soil erosion	Monitor and apply the soil conservation mechanisms
Forest Act 12 of 2001 Forest Act Regulations 2015	To provide for the protection of the environment and the control and management of forest. Relevant sections: - Approval required for the clearance of vegetation	Forestry permits maybe required for vegetation clearing

National Statutes	Relevance	Applicability to the Proposed Project
	on more than 15 hectares (Section 23, subsection 1 (b)). - Tree species and any vegetation within 100m from a watercourse may not be removed without a permit (Section 22, subsection 1 (b))	
Public Health Act (Act No. 36 of 1919)	Advocates for Public Health and safety	Protective clothing
The Occupational Safety and Health Act No. 11 of 2007	Advocates for employee and public safety, health	In the working context "SAFETY" implies "free from danger"
National Heritage Act, No. 27 of 2004.	The Act provides provision of the protection and conservation of places and objects with heritage significance.	Refer to handling procedures presented in the Scoping Report

4. ROLES AND RESPONSIBIILTIES

This section outlines the roles and responsibilities of the key personnel responsible for the day to day management of activities to ensure effective implementation of the EMP.

4.1 Roles and Responsibilities

Assignment of responsibilities is necessary to ensure that key procedures are followed. Ultimately, the overall responsibility for the implementation of the EMP lies with the proponent (Ocean Bunker Petroleum Services).

To ensure accountability, it is necessary to assign responsibilities. The key role-players for project implementation are;

a) The **Environmental Compliance Officer (ECO)** representing the Ministry of Environment, Forestry and Tourism (MET), or an appointed independent environmental officer, who is responsible for monitoring and auditing.

b) **The Proponent**: **(**Ocean Bunker Petroleum Services**)**.

c) **The Site Manager** the person responsible for the management of the fuel storage facility activities project.

4.1.1 The Environmental Compliance Officer (ECO):

The ECO refers to the party responsible for the environmental monitoring and auditing to ensure that the provisions of the EMP are complied with.

The ECO shall have adequate environmental knowledge to understand and interpret the EMP and pertaining environmental aspects associated with the project. The specific tasks of the ECO are as follows:

- To undertake all monitoring and auditing activities in-order to ensure compliance with the EMP.
- Conduct inspections and monitoring at reasonable intervals (e.g. every month, quarterly or annually), throughout the duration of the project. Depending on the risks, some projects may require regular inspections.
- Issue compliance or non-compliance orders to the proponent, contractors / sub-contractors.
- Compile compliance and rehabilitation Reports pertaining to any non-compliance incident/s.

- Liaise closely with all key stakeholders i.e. the Site Manager and the Environmental Commissioner.
- Provide guidance on any environmental management issues, incidents or emergencies that may arise throughout the project lifespan.
- Assist in providing recommendations for remedial action in the event of non-compliance.
- Auditing or monitoring activities may involve investigation, as well as structured observation, measurement, and evaluation of environmental data over a period of time.

4.1.2 The Proponent:

The proponent(Ocean Bunker Petroleum Services), hereinafter referred to as OBPS, shall assume overall responsibility to ensure implementation of the EMP and will be held accountable against the remedial measures outlined herein. It is recommended that the client should appoint a Site Manager who will be responsible for monitoring of daily operations.

The specific responsibilities of The Proponent are as follows:

- Appoint a Site Manager (SM) to oversee the daily onsite activities.
- Liaise closely with the SM and ECO on any environmental management issues, incidents or emergencies.
- Ensure that all activities on and around the site are conducted in accordance with the requirements of the EMP at all times.
- Ensure that all sub-contractors and visitors to the site are conversant with the requirement of the EMP, relevant to their roles on site.
- Shall develop a **communication strategy** between The Proponent, Project Manager, workers, the ECO and any other relevant stakeholder.
- Shall develop an **organisational structure** to ensure that:

  - There are clear channels of communication;
  - There is an organisational hierarchy for effective implementation of the EMP; and
  - Conflicting or contradictory instructions are eliminated;
  - Ensure that all instructions and official communications regarding environmental matters shall follow the organisational structure as determined
  - Ensure that that EMP requirements are assigned to specific people / positions with the capacity and experience required for implementation.

4.1.3 The Site Manager:

The **Site Manager (SM)** should:

- Ensure that each team recruited to work at the sites, adheres to the EMP;
- Ensure that a **copy of the EMP is kept on site at all times and as it may be requested by authorities conducting spot checks at any time**.
- Ensure that all staff attend an induction session before commencement of any work on site and that they are adequately informed of the requirements of the EMP;
- Take special care to prevent irreversible damage to the environment

4.2 Instructions

All instructions and official communications shall follow the organisational structure as determined by the Proponent. Based on the adopted structure, it is essential that responsibilities outlined are assigned to specific parties with adequate capacity and experience required to implement the EMP.

4.3 Disciplinary Actions

The EMP is a legally binding document. Non-compliance with the EMP may result in disciplinary action being taken against the Proponent. Such actions may take the form of;

- Financial penalties, Legal action, fines, and/or Suspension of work.

The disciplinary action shall be determined according to the nature and extend of the non-compliance, and exact penalties are to be weighed against the severity of the incident.

5. POTENTIAL IMPACTS AND MITIGATION MEASURES

5.1 Approach to mitigation measures

To enable a systematic approach to impact identification, specifics aspects have been identified and for each aspect, specific mitigation measures have been recommended Table 5. It is important to note that this EMP is for the continuation of fuel storage facility activities from existing fuel storage facility to meet the township development requirements of the ORTC.

Table 3. EMP Impact Identification Section and Associated Aspects

EMP Implementation / Potential Impact Category	Specific Aspects
A. Staff Induction	EMP Provisions (Do's and Don'ts)
	HIV / AIDS
	Communication Channels
B. Operational Phase	Access Roads
	Site Demarcation
	Notice Board
C. Environment and Pollution	Vehicle emissions
	Oil Spills
	Soil Erosion
D. Health and Safety	Safety at Work Place
	Dust
	Noise
E. Socio Economic	Employment opportunities for locals
	Drug and Alcohol abuse
	Working hours
	HIV / AIDS
F. Cultural Heritage	Heritage resources / artefacts

SECTION A: STAFF INDUCTION

Aspect	Objective	Proposes Mitigation Measures	Monitoring Indicator	Party responsible
Staff induction	To ensure that all staff / employees are conversant with the requirements of the EMP	• Induction for all staff / employees on the provisions of the EMP before work commencement, covering but not limited to: environmental awareness, emergency response, Reporting of incidents, HIV/AIDS awareness, alcohol and substance abuse, and Safety, Health and Environment (SHE) measures • Staff operating equipment (such as loaders, etc.) shall be adequately trained and sensitized to any potential hazards associated with their tasks • Quarterly induction reviews	Induction Minutes and Attendance Register, Signed by each and every staff member Staff members appointed at a later stage should also undergo induction Quarterly minutes	Site Manager
	Punitive measures for staff, to ensure compliance	• Adopt a disciplinary system to discipline staff for non-compliance, such as littering, speeding, safety risk both to themselves and to others, not using ablution facilities, etc.	Number of fines/warning issued daily/Monthly	Site Manager
	Availability of the EMP on site for ease of reference	• Ensure that a copy of the EMP is kept on site and accessible to team leaders	Availability of EMP on site and accessibility to team leaders	Site Manager
Communication	To ensure effective communication throughout the project lifespan	• Develop a communication strategy (Chanel and medium of communication) • All correspondence should be written and signed off by witnesses (e.g. Site manager) • The contact numbers for the Site Manager or Site Foreman must be available onsite (displayed) in case of emergencies.	Communication Strategy Letters, e-mail, Notices, Minutes	Site Manager

SECTION B: OPERATIONAL PHASE

Aspect	Objective	Action Required	Monitoring Indicator	Party responsible
Site Demarcation	Contain all project activities within the site boundaries	• The mining area must be clearly demarcated by means of pegs/markers at all corners of the site and along its boundaries (where practical). • Permanent pegs/markers must be firmly erected and maintained in their correct position throughout the life of the operation. • The fuel storage facility site must be fenced off, to ensure public	Visible fence around the project site	Site Manager
General Notice Board	To notify and warn the public of the project activities	• A notice board is on site to notify the public about the ongoing activities, particularly during the construction and installation of the fuel tanks	Notice Board – Visible and Clear	Site Manager

SECTION C: ENVIRONMENT AND POLLUTION

Aspect	Objective	Action Required	Monitoring Indicator	Party responsible
Oil Spils	Manage oil spills and leak from heavy vehicles and Machinery	• Provide drip trays to prevent potential oil leakage • Re-fuelling of machinery (e.g excavator / front loader) must be done at appropriate site with impermeable concrete bunding • There must be an immediate spill response kit on site and ff an oil spill occurs, collect the contaminated soil, store in drums and dispose at appropriate waste disposal site (i.e demarcated municipal disposal site)	Observation of soil contamination	Site Manager
Solid Waste	To prevent littering, pollution, contamination of water and general environmental health hazards	• All waste produced on site should be contained and disposed as required by law. • There must be sufficient temporally ablution facility at the site for designated for males and female.	Scattered waste, Littering and any other unsightly waste at the site (eyesore)	Site Manager

SECTION D: HEALTH AND SAFETY

Aspect	Objective	Proposed Mitigation Measures	Monitoring Indicator	Party Responsible
General Safety at Work Place	Ensure that the safety of workers is not compromised and adhere to the Health and Safety Regulations, Government Notice 156/1997 (GG 1617)	• Develop a Health and safety Plan (should be part of the induction) • Employees must be equipped with all necessary Personal Protective Equipment (PPE). These includes, Helmet, Overall, Safety Shoes, Safety Glasses, Gloves, Welding shield, Earmuff etc; • Provide first aid kits to operators; • Only qualified personnel must be allowed to operate special machinery (e.g earthmoving machinery) • Adequate safety signs must be displayed on site.	Health and Safety included and reflected in the Induction Minutes Adequate protective gear for all staff, and availability of the first aid kit onsite Record of warnings, and visible safety signs on site	Site Manager
Dust	Mitigate dust and noise impacts to both employees and the public	• Provide dust masks and ear muffs to all employees operating in a dusty or noisy environment	Incident Report Public Complains	Site Manager
Noise		• Employees must NOT be exposed to noise levels above the required -85dB (A) limit over a period of 8 hours. Should the noise level be higher than 85dB (A), the employer must implement a hearing conservation program such as noise monitoring; • Provide worker with earmuff		
Ablution	Reduce health risks and environmental pollution	1. Ensure adequate, hygienic (clean) and user friendly ablution facilities for all staff. 2. Inspect ablution facilities regularly	availability, cleanliness and hygienic ablution facilities	Site Manager

SECTION E. SOCIO ECONOMIC ASPECTS

Environmental / Social Impact	Objectives	Proposed Mitigation Measures	Monitoring Indicator	Party Responsible
Employment opportunities for Locals	Promote benefits to the local community	• Recruit locals for unskilled labour • Where possible, procure materials from local suppliers	Employee structure and proportion of local employment	ONPTC
Alcohol and Drug use	Prevent alcohol and drug use at work	• Ban and warn the employees against the use of alcohol and drug at work • Provide awareness on the dangers and health impacts of alcohol and drug use	Drunk / Misbehaving employees Monitor presence of alcohol at work	Site Manager
Working hours	Adhere to the Labour Act No. 11 of 2007	• Operate within the prescribed working days and hours as per the Namibian Labour laws and regulations	Verification of working hours against the labour Act	Site Manager
HIV / AIDS	Provide HIV / AIDS awareness to employees	• The Ministry of Health and Social Services provides free condoms to all public amenities and health care centers. • Arrange for HIV awareness for employees;	Availability of condoms at work Minutes for induction course	Site Manager

SECTION F. HERITAGE AND ARCHAEOLOGY

Aspect	Objective	Action Required	Monitoring Indicator	Party responsible
Heritage Resources / artefacts	Reduce the impacts borehole drilling and associated earthworks on heritage resources / artefacts	1. Heritage remains or artefacts discovered on site must be reported to the National Museum (+264 61 276800) or the National Forensic Laboratory (+264 61 240921). 2. No artefacts must be removed or be interfered with prior to authorisation from the Namibian National Heritage Council (NHC) 3. Recovery of heritage remains or artefacts discovered and removal thereof should be directed by the National Museum	Sighting report/s of heritage resources / artefacts	Site Manager

6. CONCLUSION

The EMP has identified and recommended measures to be adopted by the by the Ocean Bunker Petroleum Services (OBPS) to manage the fuel storage facility activities in accordance with the recommended measures and rehabilitation plan.

Currently, the fuel storage facility is the only source of construction material to meet the developmental requirements of the town. The town council would like to conform to the Environmental Management Act of 2007 and EIA regulations of 2012 and hereby commits itself to abide to the recommended mitigation and rehabilitation measures as prescribed in the Environmental Management Plan (EMP).

The Ocean Bunker Petroleum Services intent to continue with the fuel storage facility activities within the recommended mitigation parameters.

It is recommended that an Environmental Control Officer (ECO) and the town engineer, monitors the preparation, operational and rehabilitation of the fuel storage facility so as to ensure that the mitigation and rehabilitation measures prescribed in this report are adhered to.

The aim of the EMP is to ensure legal compliance to prevent environmental fatal flaws. Non-compliance against the EMP is punishable and specific responsibilities has been assigned to role players in-order to ensure that the EMP is implemented. The key role-players are defined under section 4 should:

- ***Read*** the EMP (particularly the Project Manager) and ensure that they are fully conversant with provisions of the EMP,
- If need be, ***Ask for clarity*** from the Environmental Assessment Practitioner (EAP), Environmental Compliance Officer (ECO) or relevant authority,
- Ensure implementation of the recommended mitigation measures, and
- Communicate defaults / challenges to the ECO as soon as possible.

The ECO should monitor (conduct periodic and unannounced EMP audits) in-order to ensure compliance against the recommended mitigation measures.