

ENVIRONMENTAL MANAGEMENT PLAN

ENVIRONMENTAL
CLEARANCE CERTIFICATE
FOR THE OPERATION OF
THE EXISTING CONSUMER
INSTALLATIONS AT
WALDSCHMIDT EGGS,
WINDHOEK, KHOMAS
REGION

2023

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ABBREVIATIONS

AIDS	Acquired Immuno-Deficiency Syndrome
ER	Owner's Representative
EA	Environmental Assessment
ECC	Environmental Clearance Certificate
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
EMA	Environmental Management Act
EMP	Environmental Management Plan
GG	Government Gazette
GIS	Geographic Information System
GN	Government Notice
GPS	Global Positioning System
HIV	Human Immuno-deficiency Virus
I&APs	Interested and Affected Parties
NHC	National Heritage Council
Reg.	Regulation
S	Section
TB	Tuberculosis

1 INTRODUCTION

Waldschmidt Eggs is a 100% Namibian producer of farm fresh eggs. The company was established in 1959 by Jörg Waldschmidt as a family business. After the founder Jörg Waldschmidt retired his son Eckard Waldschmidt took over the business and has kept it growing bigger every year.

Waldschmidt Eggs pride themselves in that they are the first and only egg manufacturers in Namibia who:

- Have a production date on every single egg: PD - production date example PD02.20.
- Raise their own hens in Namibia with guaranteed healthy chicks imported from the Netherlands and Germany.
- Provide healthy hens and can guarantee that no anti-biotics are used in the production.
- Have been operating a 100% namibian business since 1959.
- Have all systems operating with solar (See **Figure 1** below)
- Have all their eggs sorted with the latest technology with an accuracy of 0.01%.

The company purchases and stores diesel on site for their fleet and farming equipment, the diesel is sourced from Engen Namibia (Pty) Ltd.

ENGEN Namibia (Pty) Ltd is a leading marketer of liquid fuels and lubricants in the country and aims to ensure that all their clients and facilities are compliant with the relevant environmental and industry legislation. It is against this background that Waldschmidt Eggs have appointed Environam Consultants Trading (ETC) to apply for an Environmental Clearance Certificate (ECC) for these installations on their behalf.

The site operations and installations are in accordance with Engen Namibia (Pty) Ltd policies and regulations and industry standards. The diesel is stored in a 23 m³ above ground tank:

Table 1: Product details

PRODUCT	NUMBER OF TANKS	CAPACITY	TOTAL CAPACITY ON SITE
Diesel 50PPM	1	23m ³	23m ³



Figure 1: Solar modules on several chicken coops at Waldschmidt Eggs (Image: HopSol)

2 Locality

The site is located at the coordinates -22.38697° , 17.08461° on 13 Döbra, Windhoek Namibia, in the Khomas Region, (See **Figure 2** below for the locality map).

The general amenities offered at the site consist mainly of the fuel facilities for own use; off-loading of fuel from fuel tankers; administration and control centre offices; ablution and change house facilities for staff.

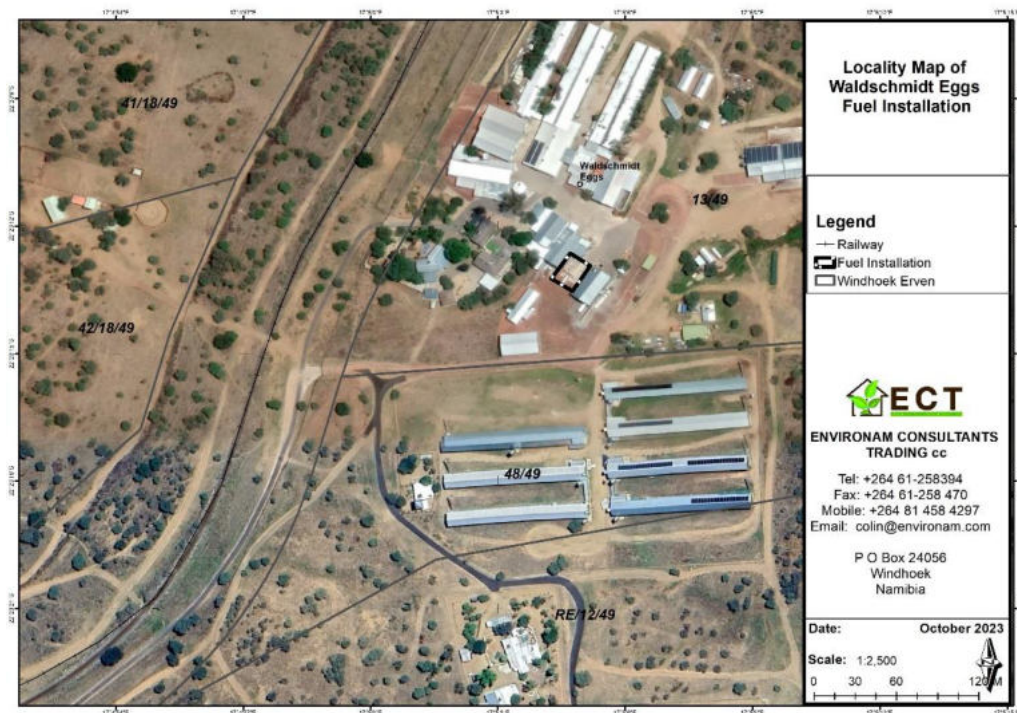


Figure 2: Locality map of Waldschmidt Eggs

3 ENVIRONMENTAL MANAGEMENT GUIDELINES

A number of potential environmental impacts may occur during the operations at the site and possibly during the decommissioning phase of the installations. There are already existing environmental controls on site (See **Figure 3** below), hence some of the recommendations are already being implemented on site and emphasis should be given to continuous and preventative maintenance of the systems on site. The following guidelines must be used:



Figure 3: Installations on site

3.1 HYDROCARBONS MANAGEMENT

If any spillage occurs, contaminated soil shall be collected in a holding tray or drum and disposed at a licensed hazardous waste site. Any spillage of more than 200 litres must be reported to the Ministry of Mines and Energy as per the Petroleum Products Act. Engen Namibia (Pty) Ltd shall take all reasonable measures to prevent surface or groundwater pollution from the release of oils and fuels. In addition, sufficient space should be left in fuel tanks to allow fuel expansion and to prevent leakage of fuel from the underground tanks.

3.2 ACCESS AND WORK SITES

Fuel tanker trucks shall access the site via permitted routes within the premises. Uncontrolled driving should not be permitted. Routes should be clearly marked with signs, together with designated turning points.

3.3 SITE MANAGEMENT

Staff at the site and contractors should be educated and informed of their environmental obligations. Deterrent penalties for damages should be stipulated, and perpetrators should be held responsible for all transgressions. Areas outside this designated working zone shall be considered “no go” areas. Engen health and safety policies should be implemented at all time.

3.4 STAFF MANAGEMENT

The manager must ensure that all employees have suitable personal protective equipment and are properly trained in firefighting and first aid. Engen Namibia and the site owner will take overall responsibility of training the responsible personnel on environmental management and overall implementation of the EMP on site.

3.5 WASTE MANAGEMENT

All waste generated at the site should be disposed of at designated licensed disposal site. Provision of sufficient bins or containers on-site to store any solid or liquid waste produced should be made. Liquid wastes from the oil/water separators should be cleared by Windhoek municipality before discharged into the municipal sewage line. All fuel

waste should be contained in approved containers and be cleared by Windhoek municipality before disposed by licensed contractor. The bins and containers should be weatherproof and scavenger-proof.

3.6 FIRE AND SAFETY MANAGEMENT

Hydrocarbons are volatile under certain conditions and their vapours in specific concentrations are flammable. If precautions are not taken to prevent their ignition, fire and subsequent safety risks may arise. No fire or any source of fire ignition is to be allowed on site during any of the two phases (operational and decommissioning). Engen and the site owner shall take all reasonable measures and active steps to avoid increasing the risk of fire through activities on site and prevent the accidental occurrence or spread of fire; and shall ensure that there is sufficient fire-fighting equipment on site at all times. This equipment shall include fire extinguishers and horse reels.

4 ENVIRONMENTAL MANAGEMENT PLAN

In terms of the Environmental Management Act 7 of 2007 (Government Notice No. 29), certain activities may not be undertaken without an Environmental Clearance Certificate (ECC). This activity is included in the above-mentioned list, with particular reference to the following activities of the gazetted Namibian Government Notice No. 30 Environmental Impact Assessment Regulations:

Activity 9.2 Any process or activity which requires a permit, licence or other form of authorisation, or the modification of or changes to existing facilities for any process or activity which requires an amendment of an existing permit, licence or authorisation or which requires a new permit, licence or authorisation in terms of a law governing the generation or release of emissions, pollution, effluent or waste.

Activity 9.4 The storage and handling of dangerous goods, including petrol, diesel, liquid petroleum, gas or paraffin, in containers with a combined capacity of more than 30 cubic meters at any one location.

Activity 9.5 Construction of filling stations or any other facility for the underground and aboveground storage of dangerous goods, including petrol, diesel, liquid, petroleum, gas or paraffin.

Key to the issuance of an Environmental Clearance Certificate is the submission of an Environmental Management Plan (EMP) which provides for a description of how an activity might impact on the natural environment in which it occurs and clearly sets out commitments from the proponent on how identified impacts will be avoided, minimised and managed so that they are environmentally acceptable.

An EMP is one of the most important outputs of the Environmental Assessment process as it synthesises all of the proposed mitigation and monitoring actions, set to a timeline and with specific assigned responsibilities. As part of the application for a renewal of the ECC, Environam Consultants Trading has developed an EMP that will outline the appropriate actions.

An EMP will generally detail the mitigation and monitoring actions to be implemented during the following phases of a development:

- Planning and Design – the period, prior to construction, during which preliminary legislative and administrative arrangements, are made and engineering designs are carried out. The preparation of construction tender documents forms part of this phase;
- Construction – the period during which the owner, having dealt with the necessary legislative and administrative arrangements, appoints a contractor for the development of services infrastructure as well as any other construction process(s) within the development area;
- Operation and Maintenance – the period during which the services infrastructure and other structures will be fully functional and maintained.

The installations at the site already exist and in use, therefore the EMP will only cover the operation and maintenance phase, and include the decommissioning phase.

5 ROLES AND RESPONSIBILITIES

Waldschmidt Eggs is ultimately responsible for the implementation of the EMP. The proponent may delegate this responsibility as the project progresses through its life cycle. In this case the delegated responsibility for the effective implementation of this EMP will rest on the following key individuals:

- Owner's Representative;

- Site Owner;
- Environmental Control Officer; and
- Contractor (Operations and Maintenance).

5.1 OWNER’S REPRESENTATIVE

The owner may assign the responsibility of managing all aspects of this development to a designated member of staff, referred to in this EMP as the Employer’ Representative (ER). The owner may decide to assign this role to one person for the full duration of this development, or may assign a different ER to each of the development phases. The ER’s responsibilities are as follows:

Table 2: Responsibilities of ER

Responsibility	Project Phase
Making sure that the necessary approvals and permissions laid out in Table 3 are obtained/adhered to.	Throughout the lifecycle of this development
Suspending/evicting individuals and/or equipment not complying with the EMP	<ul style="list-style-type: none"> • Operation and maintenance
Issuing fines for contravening EMP provisions	<ul style="list-style-type: none"> • Operation and maintenance

5.2 ENVIRONMENTAL CONTROL OFFICER

The ER may assign the responsibility of overseeing the implementation of the whole EMP on the ground during the operation and maintenance phase to a designated member of staff, referred to in this EMP as the Environmental Control Officer (ECO). The PR /Proponent may also decide to assign this role to an independent environmental consultant. The ECO will have the following responsibilities during this development:

- Management and facilitation of communication between the Owner, ER, the contractors, and Interested and Affected Parties (I&APs) with regard to this EMP;
- Conducting site inspections (recommended minimum frequency is bi-monthly) of all infrastructure maintenance areas with respect to the implementation of this EMP (monitor and audit the implementation of the EMP);

- Submitting bi-annual reports to the office of the Environmental Commissioner;
- Assisting the Contractor in finding solutions with respect to matters pertaining to the implementation of this EMP;
- Advising the ER on the removal of person(s) and/or equipment not complying with the provisions of this EMP;
- Making recommendations to the ER with respect to the issuing of fines for contraventions of the EMP; and
- Undertaking an annual review of the EMP and recommending additions and/or changes to this document.
- Applying for the renewal of the ECC upon expiry.

5.3 CONTRACTOR

Contractors appointed by the owner are automatically responsible for implementing all provisions contained within the relevant chapters of this EMP. Contractors will be responsible for the implementation of this EMP applicable to any work outsourced to subcontractors. **Table 4** applies to contractors appointed during the operation and maintenance phase. In order to ensure effective environmental management, the aforementioned chapters should be included in the applicable contracts for outsourced operation and maintenance work.

5.4 ASSUMPTIONS AND LIMITATIONS

This EMP has been drafted with the acknowledgment of the following assumptions and limitations:

- This EMP has been drafted based on the information presented by the proponent. ECT will not be held responsible for the potential consequences that may result from any alterations to the existing infrastructure.

6 APPLICABLE LEGISLATION

Legal provisions that have relevance to various aspects of this development are listed in **Table 3** below. The legal instrument, applicable corresponding provisions and project relevance details are provided.

Table 3: Legal provisions relevant to the proposed development

LEGISLATION/POLICIES	RELEVANT PROVISIONS	RELEVANCE TO THE PROJECT
The Constitution of the Republic of Namibia as Amended	<p>Article 91 (c) provides for duty to guard against “the degradation and destruction of ecosystems and failure to protect the beauty and character of Namibia.”</p> <p>Article 95(l) deals with the “maintenance of ecosystems, essential ecological processes and biological diversity” and sustainable use of the country’s natural resources.</p>	Sustainable development should be at the forefront of this development.
Environmental Management Act No. 7 of 2007 (EMA)	<p>Section 2 outlines the objective of the Act and the means to achieve that.</p> <p>Section 3 details the principle of Environmental Management</p>	The development should be informed by the EMA.
EIA Regulations GN 28, 29, and 30 of EMA (2012)	<p>GN 29 Identifies and lists certain activities that cannot be undertaken without an environmental clearance certificate.</p> <p>GN 30 provides the regulations governing the environmental assessment (EA) process.</p>	<p>Activity 9.2 Any process or activity which requires a permit, licence or other form of authorisation, or the modification of or changes to existing facilities for any process or activity which requires an amendment of an existing permit, licence or authorisation or which requires a new permit, licence or authorisation in terms of a law governing the generation or release of emissions, pollution, effluent or waste.</p> <p>Activity 9.4 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 one location.</p> <p>Activity 9.5 Construction of filling stations or any other facility for the underground and aboveground storage of dangerous goods, including petrol, diesel, liquid, petroleum, gas or paraffin.</p>

LEGISLATION/POLICIES	RELEVANT PROVISIONS	RELEVANCE TO THE PROJECT
Convention on Biological Diversity (1992)	Article 1 lists the conservation of biological diversity amongst the objectives of the convention.	The project should consider the impact it will have on the biodiversity of the area.
Draft Procedures and Guidelines for conducting EIAs and compiling EMPs (2008)	Part 1, Stage 8 of the guidelines states that if a proposal is likely to affect people, certain guidelines should be considered by the owner in the scoping process.	The EA process should incorporate the aspects outlined in the guidelines.
Namibia Vision 2030	Vision 2030 states that the solitude, silence and natural beauty that many areas in Namibia provide are becoming sought after commodities and must be regarded as valuable natural assets.	Care should be taken that the development does not lead to the degradation of the natural beauty of the area.
Water Resources Management Act 11 of 2013	To provide for the management, protection, development, use and conservation of water resources.	The pollution of water resources should be avoided during the operation of the development.
The Ministry of Environment, Forestry and Tourism (MET) Policy on HIV & AIDS	MEFT has developed a policy on HIV and AIDS. In addition, it has also initiated a programme aimed at mainstreaming HIV and gender issues into environmental impact assessments.	The owner and its contractor have to adhere to the guidelines provided to manage the aspects of HIV/AIDS.
Local Authorities Act No. 23 of 1992	The Local Authorities Act prescribes the manner in which a town or municipality should be managed by the Village, Town or Municipal Council.	The development has to comply to provisions of the Local Authorities Act
Labour Act no 11 of 2007	Chapter 2 details the fundamental rights and protections. Chapter 3 deals with the basic conditions of employment.	Given the employment opportunities presented by the development, compliance with the labour law is essential.
National Heritage Act No. 27 of 2004	The Act is aimed at protecting, conserving and registering places and objects of heritage significance.	All protected heritage resources (e.g. human remains etc.) discovered, need to be reported immediately to the National Heritage Council (NHC) and require a permit from the NHC before they may be relocated
Public Health Act no 36 of 1919	Section 119 prohibits persons from causing nuisance.	Contractors and users of the facility are to comply with these legal requirements.
Petroleum Products and Energy Act, 1990 Petroleum Products Regulations (2000)	These legislations provide for the application of wholesale licences	The facility should have a retail licence from the Ministry of Mines and Energy.
Water Quality Guidelines for Drinking Water and Waste Water Treatment	Details specific quantities in terms of water quality determinants, which waste water,	These guidelines are to be applied when dealing with water and waste water treatment.

LEGISLATION/POLICIES	RELEVANT PROVISIONS	RELEVANCE TO THE PROJECT
	should be treated to before being discharged into the environment (see Appendix A).	

7 MANAGEMENT ACTIONS

The tables in this chapter detail the management measures associated with the roles and responsibilities that have been laid out in **Chapter 2**. The aim of the management actions in this chapter is to avoid potential impacts where possible. Where impacts cannot be avoided, measures are provided to reduce the significance of these impacts.

The following tables provide the management actions recommended to manage the potential impacts associated this development:

- Operation and maintenance phase management actions (**Table 4**); and
- Decommissioning phase management actions (**Table 5**).

The owner should assess these commitments in detail and should acknowledge their commitment to the specific management actions detailed in the tables below.

7.1 OPERATION AND MAINTENANCE PHASE

The management actions included in **Table 4** below apply during the operation and maintenance phase of this development.

Table 4: Operation and maintenance management actions

Impact	Management Actions
Education and Training	<ul style="list-style-type: none"> • All employees including all contractors appointed for maintenance work on the respective infrastructure and their employees must be made aware of necessary health, safety and environmental considerations applicable to their respective work. • Records of environmental training and incidents should be maintained. • Post instructional/ informational signs regarding storm water pollution around the facility for customers and employees. • Place signs on faucet (hose bibbs) reminding employees and customers to conserve water and not to use water to clean up spills. • Label drains within the facility boundary by paint/ stencil (or equivalent), to indicate whether they flow to an on-site treatment device, directly to the sanitary sewer, or to a storm drain.
Monitoring and Auditing	<ul style="list-style-type: none"> • An Environmental Practitioner should monitor the implementation of the EMP, and recommend any changes to this document. • The Environmental Practitioner should inspect the site on a regular basis (preferably monthly or bi-monthly). • Biannual reports are to be submitted to the Ministry of Environment, Forestry and Tourism and shared with the Local Authority. • These reports are to be submitted with the application for the renewal of the ECC.
General Facility	<ul style="list-style-type: none"> • Ensure the Premises have obtained a fitness registration from the Local Authority and is kept current. • Spot clean leaks and drips routinely. • Maintain a spill response plan and keep it current. • The above to take into consideration air, surface and groundwater, and soil quality, as well as the transportation of products to and from the facility.

Impact	Management Actions
	<ul style="list-style-type: none"> • Inspect and clean storm drain inlets and catch basins within the facility boundary at least once each year. • Ensure adherence to the Covid-19 protocols, as they are applicable from time to time. • Ensure availability of fully stocked first aid kits. • Ensure a designated and trained official is available to administer first aid. • Personnel are to be provided with relevant protective equipment.
Fuel Dispensing Area	<ul style="list-style-type: none"> • Ensure paving of the land within the confines of the property, priority to be given to concrete slabs as opposed to interlocks especially at the fuel dispensing areas. • Maintain fuel dispensing areas using dry clean-up methods such as sweeping for removal of litter and debris, or use of rags and absorbents for leaks and spills, and never wash down unless the wash water is collected and disposed of properly. • Fit underground storage tanks with spill containment and overfill prevention systems. • Fit fuel dispensing nozzles with “hold-open latches” (automatic shutoffs). • Post signs at the fuel dispenser or fuel island warning vehicle owners/operators against “topping off” of vehicle fuel tanks. • Ensure metering of incoming and outgoing fuel and maintain records. • Ensure metering equipment are calibrated as per industry standards. • Maintain all equipment, such as tanks, pumps, meters, hoses etc. in a clean state (regular inspections to be carried out).
Hazardous Substances	<ul style="list-style-type: none"> • All chemicals and other hazardous substances must be stored and maintained in accordance with the Hazardous Substances Ordinance (No. 14 of 1974), with all relevant licences and permits to be obtained where applicable. • Given the potential harm to human health during handling and use of any of hazardous substances it is essential that all staff are trained with regards to the proper handling of these substances as well as First Aid in the case of spillage or intoxication. • Storage areas for all substances, in particular fuel, should be bunded and capable to hold 120% of the total volume of a given substance stored on site.

Impact	Management Actions
	<ul style="list-style-type: none"> • Ensure fuel tanks do not leak (regular inspections to be carried out).
Housekeeping	<p>Equipment Cleaning</p> <ul style="list-style-type: none"> • Indoor Cleaning: Clean equipment in a designated area, such as a mop sink, pot sink, or floor area with a drain connected to the sanitary sewer. • Outdoor Cleaning: Clean equipment in a designated covered, bermed area with a drain connected to the sanitary sewer. • Do not clean equipment cleaned outdoors in any area where water may flow to a street, gutter, storm drain, or stream. • Use floor mats that are small enough to be cleaned inside in a mop sink or near a floor drain. • Take floor mats that are too big to be cleaned indoors, to a self-service car wash to clean? <p>Grease Handling and Disposal</p> <ul style="list-style-type: none"> • Prevent oil, grease, or waste grease from being poured down a storm drain, or into a skip container. • Ensure waste grease from grease interceptors and traps are being properly disposed of by a responsible/ recognised disposal company. • Waste is to be disposed of in terms of the Local Authority: Solid and Hazardous Waste Management Regulations: Local Authorities, 1992 (Government Notice No. 151) of 2011, and in consultation with the Municipal Hazardous Waste Inspector. • A waste water discharge permit has to be obtained from the relevant authority before any waste water is discharged into the sanitary sewer. <p>Spill Clean-up and Surface Cleaning</p> <p>Spill Prevention</p> <ul style="list-style-type: none"> • Maintain a Spill Response Plan and keep it current. • Minimise the distance between waste collection points and storage areas. • Contain and cover all solid and liquid wastes. • Ensure absorbent materials and other spill response equipment are maintained in accordance with local regulations and procedures for containment and clean-up of different spills, and that they are easily accessible from anywhere in the facility.

Impact	Management Actions
	<ul style="list-style-type: none"> • Spot clean leaks and drips routinely. • Make sure floor drains are connected to or discharge to the sanitary sewer system, and not to the storm drain system. <p>Spill Clean-up</p> <ul style="list-style-type: none"> • Stop spills at the source. • Prevent wash water from spill clean-up from flowing to a gutter or a storm drain. • Use granular absorbents (e.g., cat litter) to absorb spills. • Promptly inform the Local Authority of major spills.
Cooling and Refrigeration Equipment Maintenance	<ul style="list-style-type: none"> • Ensure all discharges from cooling and refrigeration equipment are going to the sanitary sewer and not to the street or storm drains.
Access	<ul style="list-style-type: none"> • Provide for painted guidelines in terms of access and exit points. • Consider the construction of raised islands to prevent motorist from entering and accessing through the wrong lane. • Provide for pedestrian crossing. • It is highly recommended that the premises, especially the area housing the tanks and pumps be paved, with impermeable slabs as opposed to interlocks. • The movement of traffic should be managed taking into consideration the other development in the area.
Water	<ul style="list-style-type: none"> • No dumping of waste products of any kind in or in close proximity to any surface water bodies. • Contaminated runoff from the various operational activities such as greases, fuels, oils etc. should be prevented from entering any surface or ground water bodies. • Ensure that surface water accumulating on-site are channeled and captured through a proper storm water management system to be treated in an appropriate manner before disposal into the environment. • Treat oily water through an oil/water separator before it is drained to the sewer or collected by a licensed contractor. • Prevent fuel spills: look at work practices, staff training, equipment and storage.

Impact	Management Actions
	<ul style="list-style-type: none"> • Consider the use of environmentally friendly degreasers for washing and cleaning. • Regularly monitor underground tanks and supply lines to detect leaks. • Ensure groundwater monitoring wells are in place and are regularly monitored and sampled. • Consider the installation of an automatic leak detection system. • The leak detectors must be tested and monitored regularly. • In the instance of an accidental spill, the effluent should be contained as far as possible in a separator pit. • Water to be treated in accordance with the municipal water quality guidelines, in association with the national Water Quality Guidelines.
Washing Cars and other Vehicles	<p>Regular Activity</p> <ul style="list-style-type: none"> • If car washing is a central activity of the business, consider the treatment and recycling of wash water. • Designate a vehicle washing area, and ensure cars and trucks are washed only in that area. • Ensure the “wash pad” is bermed to prevent discharges to storm drains and that it discharges to the sanitary sewer drains after adequate treatment and approval of the local authority. (Note: An outside wash pad should be covered, or its area minimized to reduce the amount of rainwater reaching the sanitary sewer. Consult the local authority for guidance) • Prohibit acid-based wheel cleaners and other specialized cleaners, or if not, ensure they are provided proper treatment before discharge to the sewer. (Note: Consult the local authority for guidance) <p>Occasional Activity</p> <ul style="list-style-type: none"> • If soap is used in washing, ensure the wash water collected is discharged, preferably with treatment, to the sanitary sewer, and not discharged to a storm drain. • Ensure rinse water from spray-on acid-based wheel cleaners are prevented from flowing to a street, gutter, or storm drain. <p>Washing New Vehicles</p> <ul style="list-style-type: none"> • Protect storm drains from solvents used to remove protective coatings from new cars. (Note: Discharges of these solvents to the sanitary sewer must receive adequate treatment and approval of the local authority).

Impact	Management Actions
Fire prevention and control	<ul style="list-style-type: none"> • A Fire/ Emergency plan conforming to approved Municipal standards should be in place. • Smoking and vaping should not be allowed on the premises. • Ensure availability of sufficient fire hydrants. • Ensure sufficient supply of water for fire hydrants. • Ensure availability of sufficient fire extinguishers. • Control high fire risk activities that have to be carried out such as welding on the premises. • Train employees in the use of fire-fighting equipment. • Store flammable inventory in a secure area with proper firefighting equipment and signage.
Energy efficiency and water management	<p>The owner should consult the relevant national and/or international development guidelines which addresses the following:</p> <ul style="list-style-type: none"> • The incorporation of water saving initiatives and technology within the development in order to reduce water demand. • Ensure sufficient metering systems are in place to monitor the energy and water use. • Train employees on the importance of water and energy savings.
Noise	<ul style="list-style-type: none"> • Do not allow activities that generate excessive noise levels. • Continuous monitoring of noise levels should be conducted to make sure the noise levels do not exceed acceptable limits. • No activity having a potential noise impact should be allowed after 18:00 if possible. • Maintain equipment used during the operation and keep them in a good state such that they do not emit excessive noise. • The World Health Organisation (WHO) guidelines values for community noise in industrial environments is 70dB. This should be adhered to.
Emissions	<ul style="list-style-type: none"> • Manage activities that generate emissions. • Use vapour recovery equipment and techniques to avoid air pollution and minimise fuel loss. • Position vent pipes at points that are far from buildings and adjacent properties.

Impact	Management Actions
	<ul style="list-style-type: none"> • Train fuel area staff in vapour recovery procedures. • Conduct regular air quality monitoring.
Waste management	<ul style="list-style-type: none"> • Explore recycling solutions for waste. • Spot clean leaks and drips routinely. • Minimise storm water pollution from outside waste receptacles by doing at least one of the following: <ol style="list-style-type: none"> a) Use of only watertight waste receptacle(s) and keep the lid(s) closed; b) Grading and paving the waste receptacle area to prevent run-on of storm water; c) Installing a roof over the waste receptacle area; d) Installing a low containment berm around the waste receptacle area; e) Using and maintaining drip pans under waste receptacles. • Provide for adequate number of refuse bins at all pumps as well as around the site. • Use recognized waste management service providers to handle solid waste. • Solid waste to be disposed of at the designated landfill of the Local Authority. • All hazardous waste to be collected and disposed of as per industry standards. • Provide suitable on-site ablution facilities to cater for all personnel and customers using the facilities. • Keep spill cleanup materials handy near the tank and loading areas. • Notwithstanding the above, waste is to be disposed of in terms of the Walvis Bay Municipality: Solid and Hazardous Waste Management Regulations: Local Authorities, 1992 (Government Notice No. 151) of 2011.
Visual Impact	<ul style="list-style-type: none"> • Use colours that blend in with the natural environment for the painting of buildings.

7.2 DECOMMISSIONING PHASE

There is an inherent environmental risk with fuel storage and handling, therefore the removal of redundant infrastructure should be done expeditiously. While residual leftovers in the storage and handling of fuel may represent a small portion of the total capacity, those seemingly insignificant small amounts of product can pose a serious health and safety risk to personnel and the surrounding environment. Hence decommissioning activities require close management. **Table 5** delineates requirements and processes to be followed without serious impact to the surrounding environment, this also include procedures for identifying pollution during the decommissioning process. Due to non-availability of local guidelines, we have looked at international best practice (adapted from Directorate of Environment and Heritage Policy Development, Australia 2017).

Table 5: Decommissioning phase management actions

Impact	Management Actions
<p>A decommissioning environmental management plan (DEMP) should be prepared prior to commencement of decommissioning works.</p>	<p>The DEMP should address the following, where relevant:</p> <ul style="list-style-type: none"> • Time frame for remediation works • Site access restriction and signage requirements • Soil contamination assessment requirements, including sampling and analytical requirements to: <ul style="list-style-type: none"> ○ Identify the type and distribution of soil contamination ○ Quantify levels of soil contamination ○ Classify soils in accordance with relevant guidelines for disposal of contaminated soil • Site remediation requirements • Waste management, containment, transportation and disposal • Erosion and sediment control • Noise management • Dust suppression and control • Equipment decommissioning, isolation, storage and transportation requirements (including provisions for solid and liquid waste containment during works) • Management of environmental releases / accidents • General housekeeping requirements during decommissioning works • Record keeping and documentation. <p>The DEMP will require input from appropriately qualified and experienced environmental professionals. Where possible, national or regional environmental personnel will take on this role, but if this is not appropriate then a qualified environmental consultant should be engaged to prepare the DEMP and undertake any sampling and analytical plans and contamination assessments.</p> <p>A Decommissioning Plan should be developed within 12 months after the ECC has been issued.</p>
<p>Decommissioning of Above-ground Storage Tanks (ASTs) and (Underground Storage Tanks) USTs</p>	<p>All tank removals must be undertaken by a suitably qualified and experienced contractor who should be aware of and have control measures for the specific hazards associated with removal, transport and disposal of petroleum storage systems (e.g. ASTs and USTs), including:</p>

Impact	Management Actions
<p>should be undertaken in accordance with acceptable standards.</p>	<ul style="list-style-type: none"> • Unexpected release of product during decommissioning and removal • Flammable vapours • Product toxicity • Excavations • Confined spaces <p>Prior to decommissioning, all product remaining in the tank (including piping and hoses) should be removed and appropriately disposed of. All vapours should be removed from tanks and a Lower Explosive Limit (LEL) of less than 5% should be confirmed using a calibrated detector. Labelling, transport and disposal of decommissioned tanks should be undertaken in accordance with national or otherwise acceptable international requirements. Appropriate supports and strapping should be used to stop movement of the tank during transport. Where USTs are to be decommissioned in-situ, they should be completely filled with an inert material after removal of associated infrastructure and purging of product and vapours. After tanks are decommissioned, soil and groundwater validation testing should occur prior to reinstatement of the ground surface. Should soil or groundwater contamination be identified the Environmental Commissioner should be contacted for more information. Records of abandonment, in-situ decommissioning or removal must be kept. All staff undertaking tank removals should be aware of specific requirements for decommissioning of (Underground Petroleum Storage Systems) UPSS.</p>
<p>Any environmental assessments undertaken must include a comprehensive review of current and historical site activities to determine the extent of environmental impacts.</p>	<p>The review should:</p> <ul style="list-style-type: none"> • Identify activities which may have resulted in environmental impacts • Identify areas of potential contamination • Identify contaminants of potential concern • Outline recommendations for further investigation, if required. <p>Where further investigation works confirm levels of environmental contamination above relevant and applicable environmental criteria / guidelines, the Environmental Commissioner should be informed and remedial works conducted to ensure areas identified as contaminated are effectively managed and remediated to the extent practicable.</p>

7.3 CONCLUSION

The facility adheres largely to good environmental management practices in terms of pollution control. The installations on site comply to the relevant international and national standards in the oil and gas industry namely SABS/SANS standards. It is therefore recommended that the application for the Environmental Clearance Certificate for the Waldschmidt Eggs consumer installations be approved, on condition that they adhere to the actions delineated in the EMP.

8 REFERENCE

Directorate of Environment and Heritage Policy Development, Australia 2017.

Namibian Government Notice No. 30 Environmental Impact Assessment Regulations, 2012.

Appendix A - Water Quality Guidelines

ANNEXURE

Water Quality Standards for Effluent

Effluent to be discharged or disposed of in areas with potential for drinking water source contamination; international rivers and dams and in water management and other areas				
			Special Standard	General Standard
DETERMINANTS	UNIT	FORMAT	95 percentile requirements	
PHYSICAL REQUIREMENTS				
Temperature	° C		Not more than 10°C higher than the recipient water body	
Turbidity	NTU		< 5	< 12
pH			6,5-9,5	6,5-9,5
Colour	mg/litre Pt		< 10	< 15
Smell			No offensive smell	
Electric conductivity 25 °C	mS/m		< 75 mS/m above the intake potable water quality	
Total Dissolved Solids	mg/litre		< 500 mg/litre above the intake potable water quality	
Total Suspended Solids	mg/litre		< 25	< 100
Dissolved oxygen	% saturation		>75	>75
Radioactivity	units		below ambient water quality of the recipient water body	
ORGANIC REQUIREMENTS				
Biological Oxygen Demand	mg/litre	BOD	< 10	< 30
Chemical Oxygen Demand	mg/litre	COD	< 45	< 100
Detergents (soap)	mg/litre		< 0.2	< 3
Fat, oil & grease, individual	mg/litre	FOG	nil	< 2.5
Phenolic compounds	µg/litre	as phenol	< 0.01	< 0.10
Aldehyde	µg/litre		< 50	< 100
Adsorbable Organic Halogen	µg/litre	AOX	< 50	< 100
INORGANIC MACRO DETERMINANTS				
Ammonia (NH ₄ - N)	mg/litre	N	< 1	< 10
Nitrate (NO ₃ - N)	mg/litre	N	< 15	< 20
Nitrite (NO ₂ - N)	mg/litre	N	< 2	< 3
Total Kjeldahl Nitrogen (TKN)	mg/litre	N	< 18	< 33
Chloride	mg/litre	Cl	< 40 mg/litre above the intake potable water quality	< 70 mg/litre above the intake potable water quality
Sodium	mg/litre	N	< 50 mg/litre above the intake potable water quality	<90 mg/litre above the intake potable water quality
Sulphate	mg/litre	SO ₄	< 20 mg/litre above the intake potable water quality	< 40 mg/litre above the intake potable water quality
Sulphide	µg/litre	S	< 0.05	< 0.5
Fluoride	mg/litre	F	1,0	2,0
Cyanide (Free)	µg/litre	CN	< 30	< 100
Cyanide (recoverable)	µg/litre	CN	< 70	< 200
Soluble Ortho phosphate	mg/litre	P	< 0.2	3,0
Zinc*	mg/litre	Zn	1	5

Effluent to be discharged or disposed of in areas with potential for drinking water source contamination; international rivers and dams and in water management and other areas				
			Special Standard	General Standard
DETERMINANTS	UNIT	FORMAT	95 percentile requirements	
INORGANIC MICRO DETERMINANTS				
Aluminium	µg/litre	Al	< 25	< 200
Antimony	µg/litre	Sb	< 5	< 50
Arsenic	µg/litre	As	< 50	< 150
Barium	µg/litre	Ba	< 50	< 200
Boron	µg/litre	B	< 500	< 1000
Cadmium*	µg/litre	Cd	< 5	< 50
Chromium, (hexavalent)	µg/litre	Cr	< 10	< 50
Chromium, Total*	µg/litre	Cr	< 50	< 1000
Copper*	µg/litre	Cu	< 500	< 2000
Iron	µg/litre	Fe	< 200	< 1000
Lead*	µg/litre	Pb	< 10	< 100
Manganese	µg/litre	Mn	< 100	< 400
Mercury*	µg/litre	Hg	< 1	< 2
Nickel	µg/litre	Ni	< 100	< 300
Selenium	µg/litre	Se	< 10	< 50
Strontium*	µg/litre	Sr	< 100	< 100
Thallium	µg/litre	Tl	< 5	< 10
Tin*	µg/litre	Sn	< 100	< 400
Titanium	µg/litre	Ti	< 100	< 300
Uranium*	µg/litre	U	< 15	< 500
*Total for Heavy Metals (Sum of Cd,Cr,Cu,Hg,Pb)	µg/litre	Cd,Cr,Cu, Hg & Pb	< 200	< 500
UNSPECIFIED COMPOUNDS FROM ANTHROPOGENIC ACTIVITIES				
Agricultural chemical compounds	µg/litre		Any in-/organic compound recognized as an agro-chemical is to be avoided or reduced as far as possible. Maximum acceptable contaminant levels will be site specific, dependent on chemical usage and based the water quality of the recipient water body	
Industrial and mining chemical compounds, including unlisted metals and persistent organic pollutants	µg/litre		Any in-/ organic compound recognized as an industrial chemical including unlisted metals is to be avoided or reduced as far as possible. Maximum acceptable contaminant levels will be site specific dependent on chemical usage and based the water quality of the recipient water body	
Endocrine Disruptive Compounds (EDC)	µg/litre		Any chemical compound that is suspected of having endocrine disruptive effects is to be avoided as far as is possible. Maximum acceptable contaminant levels will be site specific dependent on chemical usage and based the water quality of the recipient water body.	
Hydrocarbons (Benzene, Ethyl Benzene, Toluene and Xylene)	µg/litre		Below detection level	Below detection level
Organo-metallic compounds: methyl mercury, tributyl tin (TBT), etc.	µg/litre		Below detection level	Below detection level
DISINFECTION				
Residual chlorine	mg/litre		< 0.1 Dependent on recipient water body	< 0.3 Dependent on recipient water body

Effluent to be discharged or disposed of in areas with potential for drinking water source contamination; international rivers and dams and in water management and other areas				
			Special Standard	General Standard
DETERMINANTS	UNIT	FORMAT		
BIOLOGICAL REQUIREMENTS (Algae and parasites)				
Further treatment of the effluent dependent on: <ol style="list-style-type: none"> 1. the water quality of the recipient water body if any 2. the distance from any point of potable water abstraction 3. an acceptable maximum contaminant level downstream of the point of discharge 4. the exposure to human and animal consumption downstream of the point of discharge 5. any reuse option that may be implemented. 				
MICROBIOLOGY				
Further treatment of the effluent are dependent on: <ol style="list-style-type: none"> 1. the water quality of the recipient water body if any 2. the distance from any point of potable water abstraction 3. an acceptable maximum contaminant level downstream of the point of discharge 4. the exposure to human and animal consumption downstream of the point of discharge 5. any water reuse option that may be implemented. 				