

# Confidential

## Environmental Inspection February 2021 Report

CONDUCTED ON BEHALF OF

### UUKUMWE YOUTH EMPOWERMENT CONSORTIUM (PTY) LTD

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NAMIBIA

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BY

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Survey Date:

**3<sup>rd</sup> of February 2021**

Next Survey date: January 2023

**PROJECT NO: 2021/004/A**



Ministry of Labour,  
Industrial Relations and  
Employment Creation  
**NAMIBIA**



## STATEMENT PAGE (1)

**National Environmental Health Consultants CC** is an Approved Inspection Authority in terms of the Occupational Health and Safety Act (85 of 1993). (Certificate No.: CI 057 0H) SA and A.I.A 21/01 Namibia, **Labour Act, 1992 (Act 6 of 1992)** as amended under the **Labour Act 2007, (Act 11 of 2007)**.

R. Cornelissen conducted this survey on behalf of **National Environmental Health Consultants CC** and hereby declares that the results given in the report are a true reflection of conditions encountered during the survey. Please note that results contained in this report only apply to conditions that existed at the time of the survey.

Where relevant published and validated methods exist, they are always used in preference to novel methods. If a novel method is applied, a summary of validation and reference to the internal Standard Operating Procedure(s) is provided.

Whilst recommendations offered in this report are made in good faith and every effort made to ensure the professional integrity thereof, the final responsibility lies with the client to ensure the correctness and suitability of these recommendations prior to implementation. **National Environmental Health Consultants CC** or its officers shall in no way be liable for any losses suffered by the client as a result of the implementation of such recommendations.

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28<sup>th</sup> April 2021  
**REPORT DATE**

Survey Date: 3 <sup>rd</sup> of February 2021	Company: UUKUMWE YOUTH EMPOWERMENT CONSORTIUM (PTY) LTD)	Occupational Hygienist Johan Cornelissen	Project No: 2021/004/A
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## STATEMENT PAGE (2)

## SCHEDULE OF ACCREDITATION

**NEHC CC** is accredited in accordance with the recognised International Standard: ISO/IEC 17020:2012 and is therefore a South African National Accreditation System (SANAS) accredited Inspection Body. The accreditation demonstrates technical competency for a defined scope and the operation of a management system.

**NEHC CC** is an accredited facility for the full scope of work that is required from Department of Labour for Inspection Bodies.

Table 1: SCHEDULE OF ACCREDITATION (*Scope of Work*)

FIELD OF INSPECTION- OHS Act REGULATED
Asbestos Regulation, Government Notice No. R 155 of 10 February 2002 Regulation: 8 Air Monitoring, Regulation 21 Demolition, Regulation 18 Maintenance of Control Measures
Lead Regulation, Government Notice No. R 236 of 28 February 2002. Regulation: 7 Air Monitoring, Regulation 14 Maintenance of Control Measures
Noise-Induced Hearing Loss Regulation, Government Notice No. R 307 of 07 March 2003. Regulation: 7 Noise Monitoring
Regulations for Hazardous Chemical Substances, Government Notice No. R 1179 of 25 August 1995. Regulation: 6 Air Monitoring, Regulation 12 Maintenance of Control Measures

## DISCLAIMERS:

When **NEHC CC** perform any other inspections or surveys that are not part of the Schedule of Accreditation, those Results in a report will be indicated as such –

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*“Results marked “Not SANAS Accredited” in this report are not included in the SANAS Schedule of Accreditation for this inspection body” (1)*

Although results are not part of the schedule of accreditation and **NEHC CC** is not an accredited facility for such work, the entire report and results are subject to strict quality control measures.

- This report contains opinions, interpretations, recommendations or other material relating to investigational activities.

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*“Opinions and interpretations expressed herein are outside the scope of SANAS accreditation” (2)*

Date: 3 <sup>rd</sup> of February 2021	Company: UUKUMWE YOUTH EMPOWERMENT CONSORTIUM (PTY) LTD)	Occupational Hygienist Johan Cornelissen	Project No: 2021/004/A
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# Walk Through Environmental Inspection Report

*Not SANAS accredited*

Date: 3<sup>rd</sup> February 2021

Third Environmental inspection since commissioning of this Seal Plant.

Assessment Team:

**Johan Cornelissen - Occupational Hygienist**

National Environmental Health Consultants

**Rion Cornelissen - Occupational Hygienist Assistant**

National Environmental Health Consultants

**MAIN ACTIVITIES:** Seal Processing Facility.

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Date:  
3<sup>rd</sup> of February 2021

Company:  
UUKUMWE YOUTH EMPOWERMENT CONSORTIUM  
(PTY) LTD)

Occupational Hygienist  
Johan Cornelissen

Project No:  
2021/004/A

## Executive Summary

National Environmental Health Consultants CC was requested by **Mrs Mabile Bester** to conduct a walk-through Environmental Assessment on behalf of **Uukumwe Youth Empowerment Consortium (Pty) Ltd) – Luderitz Seal Plant** to assist them in complying with the statutory requirements. It follows that all the results obtained in this survey were evaluated against the standards and requirements of the said Act [(No. 7 of 2007: Environmental Management Act, 2007)], unless specifically stated otherwise.

Observations not made in this report does not infer that conditions justifying such observations were not prevalent during the assessment and were merely omitted as they did not contribute to the meaning of expressions in the report.

Please note that the inspection was done during normal day to day working conditions unless otherwise stated in the Assessment report.

It must be noted that this is the third season of operation of this Seal Processing Facility. The first season was started late in 2017 and it was used as a trial for this current “full Operational Season”. The current site operations and with the current staff complement on site, no major impact on the receiving environment could be noted. This may however change significantly should activities and number of employees increase.

Records must be kept of all disposals of hazardous waste.

Records must be maintained of any complaints received from I& AP, related to any activity during this process.

The inspection results and other relevant information will be discussed in detail in the report.

During the assessment areas of concern were identified that require corrective action from the employer to ensure that conditions at the workplace do not affect the environment.

Please note that PDF report sent by NEHC CC to **UUKUMWE YOUTH EMPOWERMENT CONSORTIUM (PTY) LTD) – LUDERITZ SEAL PLANT** will be deemed a draft for two weeks, and replaces all previous reports. All changes must be lodged with NEHC within the set time period (14) fourteen days where after it will be accepted as the final approved document.

Date: 3 <sup>rd</sup> of February 2021	Company: UUKUMWE YOUTH EMPOWERMENT CONSORTIUM (PTY) LTD)	Occupational Hygienist Johan Cornelissen	Project No: 2021/004/A
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## 1. PURPOSE

To reflect the results of a walk through Environmental Inspection, in order to compare these findings with statutory requirements and to recommend corrective steps where necessary.

## 2. INTRODUCTION

National Environmental Health Consultants CC (NEHC CC) was requested by **Mrs Mabile Bester** to conduct a walk-through Environmental Inspection on behalf of **UUKUMWE YOUTH EMPOWERMENT CONSORTIUM (PTY) LTD) – LUDERITZ SEAL PLANT** to assist them in complying with the above requirements. It follows that all the results obtained in this assessment were evaluated against the standards and requirements of the applicable legislation, unless specifically stated otherwise.

## 3. ENVIRONMENTAL ASSESSMENT REPORT - *not SANAS accredited*

### 3.1 General

It must be noted that this is a walk-through visual assessment that was conducted on the 3<sup>rd</sup> of February 2021. No in-depth study has been done. Obvious possible problem issues were addressed.

### 3.2 Site Background

Site Location:

**UUKUMWE YOUTH EMPOWERMENT CONSORTIUM (PTY) LTD) – LUDERITZ SEAL PLANT - Nautilus General Industrial Area, Lüderitz.**

**Enquiries:** Mrs Mabile Bester

**Factory Receptionist**

Tel: (063) 203954

Fax: (063) 203953

P.O. Box 1280

**Lüderitz,**  
Namibia

Staff compliment is consisting of a total of twenty-seven employees 21 male, and 6 females are currently on site; one of them is acting as plant manager, with one additional security guard at the main entrance gate.

## 4. DEFINITIONS, ABBREVIATIONS AND ACRONYMS

Effluent	Water that has been used for any purpose or mixed with material or waste.
EMS	Environmental Management Systems
EMSRP	Environmental Management Systems Responsible Person within a management area who has been identified by the promoter.
General waste	Waste that may be disposed of without prior treatment. May be disposed of at a municipal dumpsite.

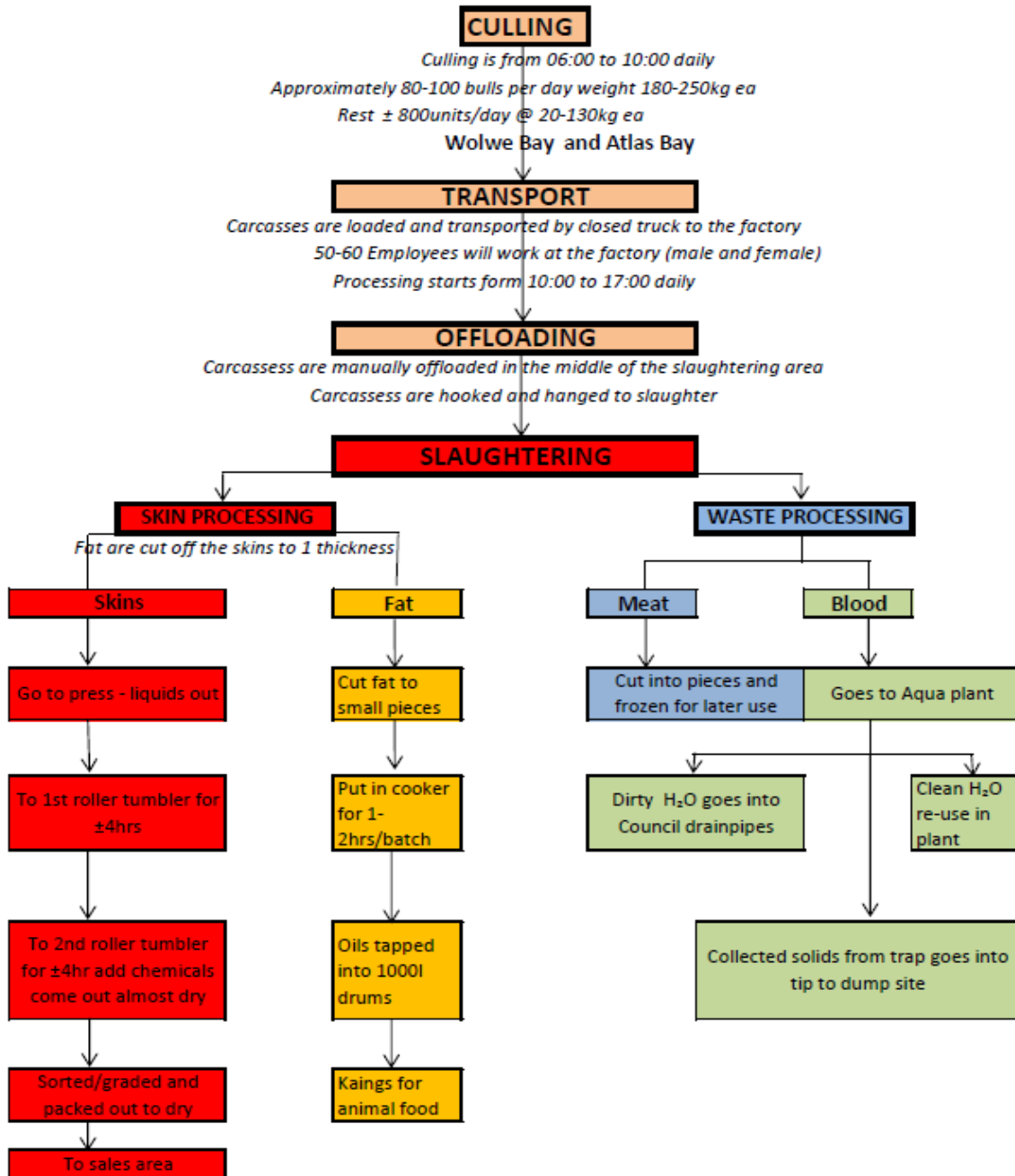
Date: 3 <sup>rd</sup> of February 2021	Company: UUKUMWE YOUTH EMPOWERMENT CONSORTIUM (PTY) LTD)	Occupational Hygienist Johan Cornelissen 	Project No: 2021/004/A
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Hazardous waste	An inorganic or organic element or compound that, because of its toxicological, 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 by introducing one or more of the following risks: <ul style="list-style-type: none"> <li>▪ Explosion or fire</li> <li>▪ Infections, pathogens, parasites or their vectors</li> <li>▪ Chemical instability, reactions or corrosion</li> <li>▪ Acute or chronic toxicity</li> <li>▪ Cancer, mutations or birth defects</li> <li>▪ Toxicity or damage to the ecosystem or natural resources</li> <li>▪ Accumulation in biological food-chains, persistence in the environment or multiple effects.</li> </ul>
ISO	International Organisation for Standardisation
MET	Ministry of Environment and Tourism.
MSDS	Material safety data sheet
OHSA	Occupational Health & Safety Regulations "Namibia"
PPE	Personal protective equipment
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).
Waste to be recycled.	Hazardous or general waste that is actually being recycled.
WKI	Work instruction

## 5. AREA PROCESS FLOWS

### 5.1 Processflow






#### PROCESS FLOW IN SEAL PROCESSING PLANT - UUKUMWE - LUDERITZ





**6. INSPECTION FINDINGS AND RECOMMENDATIONS:**

**Note: Refer to previous inspection findings dated 15<sup>th</sup> of August 2018.**






	<b>Findings</b>
<p><b>Photo No: 1</b></p>  <p><b>Photo No: 2</b></p> 	<p><b>Outside Area: Offloading Area:</b></p> <ul style="list-style-type: none"> <li>• No visual contaminations via of blood or any other seal product waste within the demarcated area.</li> <li>• Outside area management has generally been kept to a good standard</li> <li>• Truck kept visually clean.</li> </ul> <p><b>Risk:</b> Soil and underground water may be contaminated if uncontrolled drainage of pollutants occurs. Uncontrolled seal product waste may result in a rodent and fly breeding area and will also result in odour complaints. Wind may also spread odours to receiving environment. Truck contaminated with blood, etc. Offloading area in front of processing plant may become contaminated with blood, etc. during offloading process.</p>
<p><b>Photo No: 3</b></p>  <p><b>Photo No: 4</b></p>  <p><b>Photo No: 5</b></p> 	<p><b>Recommendations</b></p> <ul style="list-style-type: none"> <li>• Employees must be trained in SHE matters.</li> <li>• PPE, Training and Following Work Instructions / personal hygiene.</li> <li>• Emergency spillage and clean-up procedures must be put in place.</li> <li>• Trip &amp; Fall / Body Injury / Health Effects during offloading actions.</li> </ul>

Date:  
3<sup>rd</sup> of February 2021

Company:  
UUKUMWE YOUTH EMPOWERMENT CONSORTIUM  
(PTY) LTD)

Occupational Hygienist  
Johan Cornelissen

Project No:  
2021/004/A

	<b>Findings</b>
<p><b>Photo No: 6</b></p>  <p><b>Photo No: 7</b></p>  <p><b>Photo No: 8</b></p>  <p><b>Photo No: 9</b></p> 	<p><b>Boiler Room – HFO Tank:</b></p> <ul style="list-style-type: none"> <li>Fuel bulk supply storage banded, but – not properly sealed.</li> <li>No signs of HFO spillage.</li> <li>No Fire extinguisher</li> </ul> <p><b>Risk:</b> Fire Hazard. Contaminating ground and underground water supply. Chemical Exposure.</p> <p><b>Recommendations</b></p> <ul style="list-style-type: none"> <li>Employees must be trained in SHE matters.</li> <li>Safe working procedures must be put in place.</li> <li>Fuel line must be maintained to limit possible leakages.</li> <li>Contaminated product can only be disposed at a dumping site allocated for hazardous materials.</li> <li>Records must be kept of removals and disposals.</li> <li>Emergency spillage and clean-up procedures must be put in place.</li> <li>Emergency numbers must also be displayed and available on site.</li> <li>Fire extinguisher must be supplied in this area.</li> </ul>
	<b>Findings</b>
<p><b>Photo No: 10</b></p> 	<p><b>Inside Aqua Plant:</b></p> <ul style="list-style-type: none"> <li>No visual signs of spillage.</li> <li>2 Litre bottle stored inside <b>Aqua Plant</b>, not labelled.</li> <li>Area management has generally kept area at a good standard</li> <li>Area not sealed off properly in case of emergency spill.</li> <li>Ferric Chloride used in side <b>Aqua Plant</b>.</li> <li>No MSDS register inside the <b>Aqua Plant</b>.</li> <li>No Emergency “Eye wash station”.</li> </ul> <p><b>Risk:</b> Lock-out-tag-out procedures Housekeeping Wet Floors / Slip and Fall, Body Injury Moving and Rotating Machinery</p>

**Photo No: 11**

Lifting and Hoisting Equipment, Body Injury  
Electricity  
Contaminating ground and underground water supply.  
Chemical Exposure.

**Recommendations**

- Employees must be trained in SHE matters.
- Safe working procedures must be put in place.
- Tanks must be maintained to limit possible leakages.
- Visual contaminate (Spillage Area) must be cleaned.
- Emergency spillage and clean-up procedures must be put in place.
- Emergency numbers must also be displayed and available on site.
- Emergency "Eye wash station" must be supplied.
- PPE's, Training and Following Work Instructions / personal hygiene.

**Photo No: 12****Photo No: 13****Findings****Photo No: 14****Photo No: 15****Waste Water Treatment Plant:**

- Treatment Plant not equipped with a flow meter:
- No signs of flies or odours.
- No handrail
- Signs of spillage/spatter of Seal product waste.

**Risk:****Safety: Hazard:**

- Lock-out-tag-out procedures
- Housekeeping
- Wet Floors / Slip and Fall, Body Injury
- Moving and Rotating Machinery
- Lifting and Hoisting Equipment, Body Injury
- Electricity

**Health: Hazard:**

- Ergonomics
- Dust
- Accidental cross contamination
- Noise

**Environmental: Hazard:**

- Odours
- Vectors
- Solid Waste, blood, fat, hair and manure
- Environmental Contamination

**Recommendations**

- Employees must be trained in SHE matters.
- Provide proper handrail leading to this container.

Date:  
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Project No:  
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**Photo No: 16**

- No unauthorized entrance to this installation.
- Regular pumping of waste water must take place to avoid leakage/ overflowing
- Regular inspections of water systems on site.
- Regular cleaning of all draining systems.

### **Findings**

**Photo No: 17**

#### **Internal Waste Storage Site:**

- Poor housekeeping Practices within this area.
- Odours observed in this area.
- Properly fenced but has degraded from previous visit.

#### **Risk:**


- Soil and underground water may be contaminated if uncontrolled drainage of pollutants occurs.
- Uncontrolled seal product waste may result in rodent and fly breeding area and will also result in odour complains.
- Wind may also spread odours to receiving environment.


### **Recommendations**

- Employees must be trained in SHE matters.
- Housekeeping Practices within this area must be improved.
- Formal management of external drying area must be investigated and formal method must be followed and implemented while using this outside area.
- Care must be taken not to dump domestic waste inside this area.

**Photo No: 18****Photo No: 19****Photo No: 20**



	<b>Findings</b>
<p><b>Photo No: 21</b></p>  <p><b>Photo No: 22</b></p>  <p><b>Photo No: 23</b></p>  <p><b>Photo No: 25</b></p> 	<p><b>Skin Processing area:</b></p> <ul style="list-style-type: none"> <li>• Area generally kept clean</li> <li>• Good housekeeping practices.</li> <li>• Fire Hydrant water use to clean production floor area.</li> <li>• Fire extinguisher serviced.</li> </ul> <p><b>Risk: Safety: Hazard:</b></p> <ul style="list-style-type: none"> <li>• Wet Floors / Slip and Fall, Body Injury,</li> <li>• Manual handling, Body Injury</li> <li>• Electricity</li> <li>• Housekeeping</li> <li>• Man machine interface – fingers can get into machinery</li> </ul> <p><b>Health: Hazard:</b></p> <ul style="list-style-type: none"> <li>• Ergonomics</li> <li>• Illumination</li> <li>• Ventilation</li> <li>• Cold &amp; Heat Stress</li> <li>• Chemical Exposure (cleaning)</li> <li>• Fatigue</li> <li>• Accidental cross contamination</li> <li>• Biological Contamination, Health Effects</li> <li>• Vectors</li> <li>• Manual Handling</li> </ul> <p><b>Notes:</b></p> <ul style="list-style-type: none"> <li>• Prolonged standing and working hours.</li> </ul>
	<p><b>Recommendations</b></p> <ul style="list-style-type: none"> <li>• Employees must be trained in SHE matters.</li> <li>• PPE's, Training and Following Work Instructions / personal hygiene.</li> <li>• Trip &amp; Fall / Body Injury / Health Effects during loading actions.</li> <li>• Employees must be trained not to use Fire equipment for cleaning purposes.</li> <li>• Fire extinguishers must be inspected monthly and their service intervals dates may not expire.</li> </ul> <p><b>Photo no: 24</b></p> 

	<b>Findings</b>
<p><b>Photo No: 26</b></p> 	<p><b>Fat boil area:</b></p> <ul style="list-style-type: none"> <li>• General cleanliness of this area is good.</li> <li>• Area is not in use at the moment.</li> </ul> <p><b>Risk:</b></p> <p><b>Safety: Hazard:</b></p> <ul style="list-style-type: none"> <li>• Wet Floors / Slip and Fall, Body Injury,</li> <li>• Burns / steam</li> <li>• Working on Elevated Plat Forms</li> <li>• Lifting and Hoisting Equipment, Body Injury</li> <li>• Electricity</li> <li>• Housekeeping</li> </ul> <p><b>Health: Hazard:</b></p> <ul style="list-style-type: none"> <li>• Ergonomics</li> <li>• Illumination</li> <li>• Ventilation</li> <li>• Cold &amp; Heat Stress</li> <li>• Chemical Exposure (cleaning)</li> <li>• Fatigue</li> <li>• Cooking Pots / Steam Pressure / Heat</li> </ul>
	<p><b>Recommendations</b></p> <ul style="list-style-type: none"> <li>• Employees must be trained in SHE matters.</li> <li>• Induction training to <b>UUKUMWE YOUTH EMPOWERMENT CONSORTIUM (PTY) LTD) – LUDERITZ SEAL PLANT</b> personnel must be compulsory on a yearly basis and at employment.</li> <li>• Safe working procedures must be put in place.</li> <li>• Lockable facility must be provided to limit uncontrolled access to this area.</li> <li>• Emergency numbers must also be displayed and available on site.</li> <li>• Proper signs must be put up in areas where electric cables are be demarcated.</li> </ul>

	<b>Findings</b>
<p><b>Photo No: 27</b></p>  <p><b>Photo No: 28</b></p>  <p><b>Photo No: 29</b></p>  <p><b>Photo No: 30</b></p> 	<p><b>Abattoir Area:</b></p> <ul style="list-style-type: none"> <li>• Visual signs of seal product waste under floor grid.</li> <li>• Poor housekeeping practices.</li> <li>• Storage containers poorly maintained and cleaned.</li> </ul> <p><b>Risk: Safety: Hazard:</b></p> <ul style="list-style-type: none"> <li>• Wet Floors / Slip and Fall, Body Injury</li> <li>• Knives, Cuts</li> <li>• Shackles / Carcasses, Body Injury</li> <li>• Air-Tools, Body Injury</li> <li>• Moving and Rotating Machinery</li> <li>• Lifting and Hoisting Equipment, Body Injury</li> <li>• Electricity</li> <li>• Housekeeping</li> </ul> <p><b>Health: Hazard:</b></p> <ul style="list-style-type: none"> <li>• Ergonomics</li> <li>• Noise</li> <li>• Illumination</li> <li>• Fatigue</li> <li>• Ventilation</li> <li>• Dust</li> <li>• Cold Stress</li> <li>• Hazardous Chemicals (cleaning)</li> <li>• Accidental cross contamination</li> <li>• Biological Contamination, Health Effects</li> <li>• Vectors</li> </ul> <p><b>Environmental: Hazard:</b></p> <ul style="list-style-type: none"> <li>• Vectors</li> <li>• Odours</li> <li>• Solid Waste, blood, hair and manure</li> <li>• Environmental Contamination</li> </ul>
	<b>Recommendations</b>
	<ul style="list-style-type: none"> <li>• Employees must be trained in SHE matters.</li> <li>• Formal cleaning schedule must be put in place.</li> <li>• All incoming product must be handled in accordance to formal product procedure.</li> <li>• Vector control in regard to insects and rodents must also be implemented and maintained.</li> <li>• Induction training to <b>UUKUMWE YOUTH EMPOWERMENT CONSORTIUM (PTY) LTD) – LUDERITZ SEAL PLANT</b> personnel must be compulsory on a yearly basis and at employment.</li> <li>• Proper storage methods must be implemented.</li> </ul>
	<b>Findings</b>
<p><b>Photo No: 31</b></p> 	<p><b>Roll drums:</b></p> <ul style="list-style-type: none"> <li>• Area not currently utilized.</li> <li>• Good Housekeeping practices observed.</li> </ul> <p><b>Risk: Safety: Hazard:</b></p> <ul style="list-style-type: none"> <li>• Lock-out-tag-out procedures</li> <li>• Housekeeping</li> <li>• Wet Floors / Slip and Fall, Body Injury</li> <li>• Knives, Cuts</li> <li>• Moving and Rotating Machinery</li> <li>• Lifting and Hoisting Equipment, Body Injury</li> <li>• Electricity</li> </ul>

Photo No: 32



Photo: 33



Photo: 34

**Health: Hazard:**

- Ergonomics
- Dust
- Volatile Organic Compounds (VOC)
- Fatigue
- Ventilation
- Accidental cross contamination
- Noise

**Environmental: Hazard:**

- Chemical spillage
- Odours

**Notes:**

- Prolonged standing hours.
- Exposure to occupational hygiene stressors e.g.: Ventilation / solvents / etc.
- Possible chemicals spills
- Poor ventilation
- Eye wash station to be installed

**Recommendations**

- Employees must be trained in SHE matters
- Regular cleaning of all draining systems.
- PPE's, Training and Following Work Instructions / personal hygiene.
- Emergency spillage and clean-up procedures must be put in place.
- Trip & Fall / Body Injury / Health Effects during loading actions.

**Findings**

Photo No: 35



Photo No: 36

**Dirty Area - Ablutions:**

- Good housekeeping practices observed.

**Risk: Safety: Hazard:**

- Housekeeping
- Wet Floors / Slip and Fall, Body Injury

**Health: Hazard:**

- Ergonomics - cleaners
- Illumination

**Recommendations**

- Employees must be trained in SHE matters.



**7 GENERAL GUIDELINES:**

*(Note: this is a guideline only and does not imply that these impacts are not in place at **UUKUMWE YOUTH EMPOWERMENT CONSORTIUM (PTY) LTD – LUDERITZ SEAL PLANT**)*

**7.1 Purpose of a Waste Management Procedure:**

The purpose of WMP is to ensure that material, waste and effluent are managed responsibly from the point of creation (source) to the point of disposal. This is done by implementing the "cradle to grave" principle on all materials used at **UUKUMWE YOUTH EMPOWERMENT CONSORTIUM (PTY) LTD – LUDERITZ SEAL PLANT**, minimising the consumption of resources and including waste and effluent management strategies in all operational activities. This includes:

- a) Ensuring that all products and/or services conform to environmental requirements. Identifying and separating waste and effluent at point of origin.
- b) Ensuring proper storage and storage of waste to minimise spillage.
- c) Ensuring the correct disposal of effluent and waste to minimise pollution.
- d) Minimising the cost to **UUKUMWE YOUTH EMPOWERMENT CONSORTIUM (PTY) LTD – LUDERITZ SEAL PLANT** with regard to waste.
- e) Ensuring that all products and/or services conform to environmental requirements.
- f) Identifying and separating waste and effluent at point of origin.
- g) Ensuring suitable transportation of waste.
- h) Maximising recycling, reducing and reusing opportunities of waste.
- i) Ensuring proper storage and storage of waste to minimise spillage.

**7.2 Identification of Waste and Effluent Streams:**

Staff should have basic knowledge of the products/materials they use. The Material Safety Data Sheet (MSDS) of the product or substance must be consulted in the event of any uncertainty.

Effluent streams should be individually identified. The type and expected concentrations or levels of various physical, chemical, biological or other constituents must be determined, by consultation or otherwise.

- a. For identification purposes waste is divided into the following categories:
  - i. Hazardous waste.
  - ii. Hazardous waste to be recycled.
  - iii. General waste.
  - iv. General waste to be recycled.
- b. For identification purposes effluent is divided into:
  - i. Non-hazardous effluent
  - ii. Hazardous effluent.

**7.3 Labelling and Separation of Waste**

- a. The labelling of bins must clearly identify the type of waste therein. For example separate bins for:
  - i. Glass.
  - ii. Paper.
  - iii. Recyclable metal.
  - iv. General waste:
    - a. Under no circumstances must waste be mixed. This prevents cross contamination of waste. This is especially not allowed for general waste and hazardous waste.

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**7.4 Environmental Management Considerations:**

- a. Public Health and Safety.
- b. Compliance with legal and regulatory requirements.
- c. Real and perceived risks to the environment resulting from the organisation's activities.
- d. Impacts on the quality of life e.g. noise odours and visual intrusions.
- e. Environmental incidents and complaints.
- f. Environmental loads e.g. emissions, discharges and disposal of wastes.
- g. Consumption of resources.
- h. Sustainability.
- i. Biodiversity.
- j. Legal claims and liabilities.

**7.5 Training, Information & Education:**

- Health & Safety induction are compulsory for all new employees and contractors. Induction module is developed in order to comprehensively acquaint employees with health, safety, and environmental standards and procedures applicable to **UUKUMWE YOUTH EMPOWERMENT CONSORTIUM (PTY) LTD) – LUDERITZ SEAL PLANT's** Standard.
- Right-to-Know training on general health hazards and risks must be provided on a regular basis to employees, at least once per month as per a fixed programme.
- Material safety data sheets for all the chemicals used at **UUKUMWE YOUTH EMPOWERMENT CONSORTIUM (PTY) LTD) – LUDERITZ SEAL PLANT** must be available on site. These Safety Data Sheets must then be regularly reviewed with personnel on safety training meetings, etc.

**7.6 PPE Control (General Comments):**

- PPE requirements must be clearly set out in the relevant **UUKUMWE YOUTH EMPOWERMENT CONSORTIUM (PTY) LTD) – LUDERITZ SEAL PLANT** training modules, and must also be visually indicated at the respective workstations where such PPE is required.
- In practice, maintenance and replacement of PPE are the employees' own responsibility - supervisory personnel issue PPE on request.

**7.7 Emergency Facilities:**

- Adequate first aid and emergency stations must be provided in every area and first aiders must be appointed and trained in accordance the statutory requirements.
- Fire alarms must be placed in such a way that it is audible throughout the site.
- Fire extinguishers must be put on a maintenance program and regularly checked to ensure proper usage when needed.

**7.8 Medical Surveillance:****7.8.1 Clinical Examination:**

- Workers are all subjected to a pre-employment/pre-placement medical examination in order to determine a base line "health status" of new employees, medical examination is performed by **UUKUMWE YOUTH EMPOWERMENT CONSORTIUM (PTY) LTD) – LUDERITZ SEAL PLANT** by Occupational Medical Practitioners.

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- Formal medical examination format must be followed and records of medical surveillance must be kept on all employees of **UUKUMWE YOUTH EMPOWERMENT CONSORTIUM (PTY) LTD) – LUDERITZ SEAL PLANT**.

#### 7.8.2 Biological Monitoring:

- It is not clear what biological monitoring is currently being performed on **UUKUMWE YOUTH EMPOWERMENT CONSORTIUM (PTY) LTD) – LUDERITZ SEAL PLANT** employees.

#### 7.9 Other Health & Safety Control Aspects:

- Deficiencies must be noted and formal register must be kept of all these incidents, accidents or near misses.
- Chemical purchasing should be controlled by a standard **UUKUMWE YOUTH EMPOWERMENT CONSORTIUM (PTY) LTD) – LUDERITZ SEAL PLANT** procedure “Material Safety Data Sheets for new and trialled hazardous substances”. This procedure must require that all new chemical purchases are accompanied by material safety data sheets. The following column may be use to define Substances:

The column “Rating Property of Substance”:

	<b>Not Significant</b>	<b>Some Significance</b>	<b>Significant</b>
<b>Property of substance</b>	<ul style="list-style-type: none"> <li>Non-Hazardous substances</li> <li>Hazardous substances in quantities or in concentrations that cause or could cause little harm to the environment</li> </ul>	<ul style="list-style-type: none"> <li>Hazardous substances in quantities or in concentrations that cause or could cause harm to the environment.</li> <li>Very hazardous substances in quantities or in concentrations that cause or could cause little harm to the environment.</li> </ul>	<ul style="list-style-type: none"> <li>Very hazardous substances in quantities or in concentrations that cause or could cause harm to the environment</li> </ul>

#### Explanation of the terms in the “Rating Table”

(According to SABS code of Practice 0228-1990):

Property of Substances	Rating
Dust:	
Electricity.	Not Applicable
Emissions to the Air:	
Emissions to the Air: Organic Solvents.	Hazardous
Emissions to the Air: Ozone Depleting Substances.	Very Hazardous
Hazardous Waste:	Very Hazardous
Noise.	Not Applicable
Non Hazardous Materials:	Non-Hazardous
Non Hazardous Waste - Recyclable:	Non-Hazardous
Non Hazardous Waste:	Non-Hazardous
Still to be Determined.	
Waste to be Recycled:	Non-Hazardous
Waste Water:	
Class 1: Explosives:	Very Hazardous
Class 2.1: Flammable Gases:	Hazardous
Class 2.2: Non-flammable Gases:	Non-Hazardous
Class 2.3: Poisonous Gases:	Very Hazardous
Class 3: Flammable Liquids - Danger Group I:	Very Hazardous
Class 3: Flammable Liquids - Danger Group II:	Hazardous
Class 3: Flammable Liquids - Danger Group III:	Hazardous
Class 3: Flammable Liquids - Danger Group IV:	Non-Hazardous

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Property of Substances	Rating
Class 4: Flammable Solids:	Very Hazardous
Class 5.1: Oxidizing agents:	Very Hazardous
Class 5.2: Organic Peroxides:	Very Hazardous
Class 6.1: Poisonous Substances - Danger Group I:	Very Hazardous
Class 6.1: Poisonous Substances - Danger Group II:	Very Hazardous
Class 6.1: Poisonous Substances - Danger Group III:	Hazardous
Class 6.1: Poisonous Substances -Danger Group IV:	Hazardous
Class 6.2: Infectious Substances:	Hazardous
Class 7: Radioactive Substances:	Very Hazardous
Class 8: Corrosives:	Hazardous
Class 9: Miscellaneous - Aqua Toxic Substances:	Very Hazardous
Class 9: Miscellaneous - Carcinogenic Substances:	Very Hazardous
Class 9: Miscellaneous-Ozone Depleting Substances:	Very Hazardous


#### 7.10 Other Health and Safety aspects - Specific remarks, examples and exemptions:

- Fumes from welding and electroplating activities must be rated as “*Some Significance*” (In the column “Description Physical Significance” you write down: “Very Hazardous but in quantity and concentration not harmful to the environment”)

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# ATTACHMENT A

## Certificates

Date: 3 <sup>rd</sup> of February 2021	Company: UUKUMWE YOUTH EMPOWERMENT CONSORTIUM (PTY) LTD)	Occupational Hygienist Johan Cornelissen 	Project No: 2021/004/A
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## MINISTRY OF LABOUR, INDUSTRIAL RELATIONS AND EMPLOYMENT CREATION

Tel: +264 61 206 6111

Fax: +264 61 212 323

Enquiries: Mr. J. Shihepo Email: [Johannes.shihepo@mol.gov.na](mailto:Johannes.shihepo@mol.gov.na)

Our Ref: 01/21 Your Ref: 21/01

Private Bag 19005

32 Mercedes Street,

Khomasdal

WINDHOEK, Namibia

### Certificate of Registration as an Approved Inspection Authority

*In terms of Regulation 18 of the Regulations relating to Health and Safety of Employees at work made under  
Schedule 1(2) of the Labour Act, 2007(Act 11 of 2007)*

Authorization Number: **A.I.A. 21/01**

This is to certify that: **National Environmental Health Consultants CC**  
**P.O. Box 8416**  
**Swakopmund**

*Has been approved as an Inspection Authority*

Approved competencies	Name of the <u>only</u> person who is deemed competent to render the approved services
Occupational Hygiene, Noise, Dust, Illumination, Temperature, Stress, Ventilation, Ergonomics, Lead, Asbestos, Radiation, Vibration and Biological Monitoring Training ISO 9001, 14001 and OHSAS 18001 Implementation, OSHE Training and Audiometric	Johan Cornelissen (ID No: 6504085019086)

**From: 25 January 2021 - 25 January 2022**

Chief Inspector:

**Mr. S. Kapeng**



All official correspondence must be addressed to the Permanent Secretary

Date:  
3<sup>rd</sup> of February 2021

Company:  
UUKUMWE YOUTH EMPOWERMENT CONSORTIUM  
(PTY) LTD)

Occupational Hygienist  
Johan Cornelissen

Project No:  
2021/004/A



## CERTIFICATE OF ACCREDITATION

*In terms of section 22(2)(b) of the Accreditation for Conformity Assessment, Calibration and Good Laboratory Practice Act, 2006 (Act 19 of 2006), read with sections 23(1), (2) and (3) of the said Act, I hereby certify that:-*

### NATIONAL ENVIRONMENTAL HEALTH CONSULTANTS CC

Co. Reg. No.: 1996/044367/23

SWAKOPMUND, NAMIBIA

Facility Accreditation Number: **OH0057**

is a South African National Accreditation System accredited Inspection Body to undertake **TYPE A** inspection provided that all SANAS conditions and requirements are complied with

This certificate is valid as per the scope as stated in the accompanying scope of accreditation, Annexure "A", bearing the above accreditation number for

### OCCUPATIONAL HYGIENE INSPECTION AT WORKPLACES

The facility is accredited in accordance with the recognised International Standard

**ISO/IEC 17020:2012**

The accreditation demonstrates technical competency for a defined scope and the operation of a management system

While this certificate remains valid, the Accredited Facility named above is authorised to use the relevant SANAS accreditation symbol to issue facility reports and/or certificates

Mr M Phaloane  
Acting Chief Executive Officer

Effective Date: 13 July 2020

Certificate Expires: 02 October 2022

This certificate does not on its own confer authority to act as an Approved Inspection Authority as contemplated in the Occupational Hygiene Regulations. Approval to inspect within the regulatory domain is granted by the Department of Employment and Labour.



Date:  
3<sup>rd</sup> of February 2021

Company:  
UUKUMWE YOUTH EMPOWERMENT CONSORTIUM  
(PTY) LTD)

Occupational Hygienist  
Johan Cornelissen

Project No:  
2021/004/A



# The Southern African Institute for Occupational Hygiene

This is to certify that

**Johan Cornelissen J**

**ID Number: 6504085019086**

Has satisfied the requirements of  
the Constitution of the Institute  
and on recommendation of the Professional Certification Committee  
is registered as an

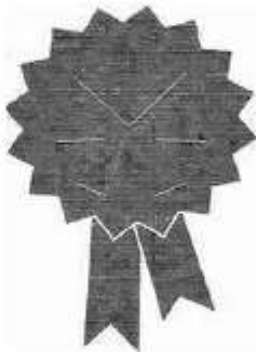
**Occupational Hygienist (OH)**

**Member Number: 0159**

*Valid until: 31 January 2022*

Karen du Preez

Chairman: Professional Certification Committee



Member ID: 33914526

Certificate ID: 33914526-20999

Issued by the Southern African Institute for Occupational  
Hygiene

SAQA Professional Body ID: 844

**IOHA Recognised  
Certification Scheme**



Date:  
3<sup>rd</sup> of February 2021

Company:  
UUKUMWE YOUTH EMPOWERMENT CONSORTIUM  
(PTY) LTD)

Occupational Hygienist  
Johan Cornelissen

Project No:  
2021/004/A





## The Southern African Institute for Occupational Hygiene

This is to certify that

**Leonie Cornelissen**

ID Number: 6604070086189

Has satisfied the requirements of  
the Constitution of the Institute  
and on recommendation of the Professionals Certification Committee  
is registered as an

**Occupational Hygiene Assistant (OHA)**

Member Number: 1447

Valid until: 31 January 2022

Karen du Preez

Chairman: Professional Certification Committee



Member ID: 37713448

Certificate ID: 37713448-20997

Issued by the Southern African Institute for Occupational  
Hygiene

SAQA Professional Body ID: 844

IOHA Recognised  
Certification Scheme



Date:  
3<sup>rd</sup> of February 2021

Company:  
UUKUMWE YOUTH EMPOWERMENT CONSORTIUM  
(PTY) LTD)

Occupational Hygienist  
Johan Cornelissen

Project No:  
2021/004/A