

<p>Project Name:</p>	<p>ENVIRONMENTAL MANAGEMENT PLAN FOR THE STORAGE AND HANDLING OF OIL AND PETROLEUM PRODUCTS AND THE MATERIALS RECOVERY FACILITY OF RENT-A-DRUM ON PORTION S OF WINDHOEK TOWN & TOWNLANDS No. 31, WINDHOEK, KHOMAS REGION</p>
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1. INTRODUCTION

According to the Environmental Management Act (2007), the operation of facilities and storage and handling of oil and petroleum products and the materials recovery facility of Rent-A-Drum on Portion S of Windhoek Town & Townlands No. 31, Windhoek, Khomas Region is part of the listed activities for which an Environmental Impact Assessment (EIA) has to be conducted and which needs an Environmental Clearance (EC) from the Ministry of Environment, Forestry and Tourism (MEFT) before implementation of the project. The MEFT indicated that they would consider the Environmental Clearance upon the submission of an Environmental Management Plan (EMP).

The proponent (Rent-A-Drum (Pty) Ltd) appointed *Green Earth Environmental Consultants* to prepare an Environmental Management Plan (EMP) to guide the operations. The EMP was prepared from information gathered from the proponent (Rent-A-Drum (Pty) Ltd) and knowledge of the site (based upon several site visits) as well as from experience with EIA's and EMP's conducted for other similar operations. The assessment concluded that the proposed project will not pose any long term or irreversible threats to the receiving or surrounding environment if the operations are conducted along the guidelines of this EMP.

The EMP included in this document contains practical measures that should be taken and maintained by the developer and manager of the proposed project in order to prevent potentially negative impacts on the environment, both from the ecological and social perspective. The EMP assigns rules, regulations and responsibilities and can be used by the MEFT and other relevant authorities as checklist to monitor compliance at the site. The idea is to minimize any negative impacts or to completely avoid it, if possible, in the operation of the proposed project.

The actions stated in this document (EMP) should be diligently followed in order to maintain a safe and healthy sustainable environment for future generations residing on the land and immediate environment. The proponent is responsible to oversee that the EMP is implemented and adhered to at all time. MEFT is kindly requested to consider and approve the EMP below and to issue a Clearance Certificate.

2. BACKGROUND AND SITE INFORMATION

The EMP included in this document is based on the principle that the relevant authorities with the MEFT as responsible Ministry, through their Environmental Control Officer's (ECO) with the proponent of the project as responsible person, should ensure that:

- The necessary environmental authorizations and permits have been obtained and are in use.

- Open and direct communication between the proponent and Interested and Affected Parties (I&APs) with regards to environmental and ecological matters are maintained.
- Regular site inspections of constructed areas and operations is conducted to ensure compliance with the EMP of the site.
- By complying with the guidelines of the EMP, the impact on the receiving environment is kept to a minimum or avoided.
- Immediate action is taken if EMP specifications are not followed or adhered to.
- The proponent/manager need to find environmentally responsible solutions.
- All new personnel/workers should be informed on the stipulations of the EMP and that environmental awareness is regarded as a high priority.
- Level of implementation and adherence to the EMP is audited on a regular basis.

There should be a clear message to the management and staff/workforce of the project that non-adherence to or non-compliance with the EMP can lead to the withdrawal of the Environmental Clearance Certificate and might lead to the closure of the project. It is against this background that the EMP has been drafted.

3. RECOMMENDATION

The following measures are recommended:

- That Rent-A-Drum (Pty) Ltd be granted an Environmental Clearance to proceed with the project by the Environmental Commissioner of the Ministry of Environment, Forestry and Tourism.
- The continuous monitoring of the identified impacts on the environment to be able to take preventative remedial action.
- The implementation of the Environmental Management Plan (EMP) to mitigate identified impacts which are associated with the operational phase of the project.
- The consideration of green building/environmentally sustainable designs in the planning, construction and operational phases for example making use of solar panels, rainwater tanks, recycling depots, etc.
- Testing of the water quality is also recommended in order to determine a baseline of the current water quality which can be used to monitor contamination which might occur and to determine if the water is suitable for use in the process. It is proposed that the water quality be monitored through annual testing and comparison with the baseline analysis.
- An Environmental Audit to be conducted a year from the date of the Environmental Clearance Certificate by an inspector (from the DEA) or an independent Environmental Practitioner to ensure that the Environmental Management Plan has been implemented and is adhered to on a continuous basis.
- Training and induction courses should be given to the managers, workforce and employees.

- The proponent is responsible for ensuring that environmental awareness education of all employees and contractors is done satisfactorily.
- The proponent should ensure that employees and contractors are made aware of the environmental requirements of the project.
- The contractors, sub-contractors and staff should familiarize themselves with the full content of the Environmental Management Plan.
- Periodic environmental monitoring must be taken on a regular basis. This should be done to ensure compliance with all aspects of the Environmental Management Plan.
- A copy of the Environmental Management Plan should be kept at the site office and should be distributed to the manager, contractors and sub-contractors.
- Non-compliance to the measures stated in the Environmental Management Plan: Implement suitable corrective action and prevent recurrence of the incident.
- An independent environmental control officer should be appointed to monitor and review the on-site environmental management and implementation of the Environmental Management Plan.
- The environmental control officer should ensure that the impacts are kept to a minimum.
- He/she should be inspecting the site and surrounding areas regularly and should monitor an ongoing program to promote environmental awareness.
- He/she should request the removal of people or equipment not complying with the specifications of the Environmental Management Plan.
- Any areas outside the designated working zone should be considered “no go” areas.

4. ENVIRONMENTAL MANAGEMENT PLAN (EMP)

The proposed EMP has been drawn to give guidance to:

- Planning of future extensions or replacing of infrastructure, equipment and services **(Planning Phase)**.
- Operations concerning the daily management and running of the development and associated activities **(Operational phase)**.
- Decommissioning of the development **(Decommissioning Phase)**.

4.1. PLANNING PHASE

The location and design of the infrastructure must fit into the surroundings and the natural environment. The manager must ensure that the sense of place be kept in accordance with the surrounding areas.

Operations should be based on the assumption that it is feasible and viable. It is important that this be tested because of the financial aspects, work opportunities and socio-economic aspects involved. It is advised that the development be audited by an independent auditor to verify if it is feasible.

Specific actions are required to ensure the negative effects or impacts are minimized on the site. The following measures should be followed:

4.1.1. Addressing of Aesthetic and Visual Issues

Responsible Person	Measures
<p>The Proponent, Developer or Builder</p>	<ul style="list-style-type: none"> a. Infrastructure on the site must be visually pleasing namely it must be in concordance with a certain natural style since the site is in rural/natural surroundings. b. The building shapes must not contrast too much of the area namely high rising buildings in future should rather be avoided. c. The use of earthy colors (paint) on the infrastructure, which are in harmony with the environment, are strongly recommended. d. If construction on the site/area is carried out, it must make use to a large extent of the natural materials namely rocks from the area, wooden poles either from already non-living trees or commercially produced poles and thatch in order not to destroy the environment. e. Should there be any development regarding communication masts, solar panels, water tanks and other prominent features, it must be placed or constructed at spots that prohibits visual destruction or minimize visual impact. f. Tourists or any person driving past the operations should not be able to notice visually unpleasing objects on the site. g. Avoid any neon or non-earthy signs that will reduce the sense of place, rather use metal or wood to construct signs. h. If practical and feasible, all additional or new pipes and cables must be buried underground and not be visible to the public. i. The visual character of the site should not compromise the integrity of landmarks and places of cultural and heritage significance such as heritage sites, national monuments, urban conservation areas, old buildings, special scenic areas and tourist sites of interest.

	<p>j. The development should not significantly impact on the integrity of significant views. If a proposed facility may interrupt such a view, the options to minimise the visual impact should be considered.</p>
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4.1.2. Ensuring water consumption efficiency	
Responsible Person	Measures
<p>The Developer and Builder</p>	<ul style="list-style-type: none"> a. Any addition of lawns or cultivated gardens on the site must be limited since it makes use of sparse clean water. The cultivation or enhancements of locally adapted natural grasses which can survive the natural conditions are preferred. b. Rivers and drainage systems bordering the site must be maintained and channels must be kept open to conserve the environment and flow of water. c. Water efficient systems/equipment which limit the use of water or make recycling of water possible should be introduced.

4.1.3. Ensuring energy consumption efficiency

Responsible Person	Measures
The Developer or Builder	<ul style="list-style-type: none">a. Preference must be given to the implementation of energy conserving and efficient systems. Renewable energy sources like gas produced from household waste or solar should be considered to replace the current commercially supplied electricity where possible.b. Devices or equipment which conserves energy must be introduced and used in the operations of the development.c. Cautioned measures on how to handle electricity must be addressed to everyone working or residing on or near the project area, so as to conform to safety regulations in workplace.

4.1.4. Limiting creation of solid waste

Responsible Person	Measures
The Manager	<ul style="list-style-type: none">a. Consumables and containers which can be recycled or which are biodegradable must be introduced in order to limit the creation of solid waste which has to be taken out of the area to be managed and handled at another site.b. Hazardous waste should be transported to the nearest approved municipal landfill site.c. Concepts like pollution control, material substitution and maximization on recycling content in order to reduce waste generation and disposal should be introduced.

4.1.5. Health and Safety of the Workforce

Responsible Person	Measures
The Builders, Workforce and Developers	<ul style="list-style-type: none">a. The safety, security and health of the labour force, employees and neighbours are of great importance, workers should be orientated with the maintenance of safety and health procedures and they should be provided with PPE (Personal Protective Equipment).b. A health and safety officer should be employed to manage, coordinate and monitor risk and hazard and report all health and safety related issues in the work place.c. The introduction of external workers into the area is sometimes accompanied with criminal activities posing security risks for neighbouring land/farms therefore security measures should be introduced to prevent such activities for example a security guard can be employed to safeguard the activities.

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| | <ul style="list-style-type: none">d. The welfare and quality of life of the neighbouring land/farms and workforce needs to be considered in order for the project to be a success on its environmental performance.e. Conversely, the process should not affect the overall health of persons related to the project including the neighbours. |
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4.2. OPERATIONAL PHASE

Steps to be taken in the daily management and running of the proposed project are stated in the following section. To ensure that the project is operated on an environmentally sustainable manner, the following **general guidelines** are included in the EMP:

- a. The project must be managed with minimal disturbance to the surrounding natural environment.
- b. It must be ensured that guests to the site behave in an appropriate manner that does not impact negatively on the environment, wildlife and local communities.
- c. The conservation of the natural and human environment must be regarded as high priority.
- d. An “environmental friendly behavior” must be cultivated and maintained amongst all people involved in the activities.
- e. The job description for the manager must include his/her responsibilities and duties towards the implementation and adherence to the EMP.

The following specific environmental management issues which require daily operational attention from management and staff are included in the EMP:

4.2.1. Human Waste Management (Sewage)	
Responsible Person	Measures
The Proponent, Developer, Constructor and Builders	<ul style="list-style-type: none"> a. All the toilets must be flush-type toilets and should be linked to their own French Drain/septic tank. b. Notices must be placed in the toilets indicating that staff members or workers should not flush foreign objects down the toilet to ensure a healthy environment and the sustained functioning of the sewer system.

4.2.2. Storage of Raw Materials	
Responsible Person	Measures
The Proponent and Manager	<ul style="list-style-type: none"> a. Smelly products should be managed in order that it will have a limited impact on the surrounding neighbours. b. The storage areas should be clearly marked and have clear/highly visible instructions on procedures to be followed in the handling and in case of spillages or other emergencies. c. The handling, operations and storage areas should be hygienically managed to prevent the breeding of flies and the generation of bad smells.

4.2.3. Management of Waste Water	
Responsible Person	Measures
The Proponent and Manager	<ul style="list-style-type: none"> a. The possibility of leakages must be managed by ensuring that the condition of the pipelines and channels are continuously visually monitored by the manager and staff members. b. The staff must monitor and limit water consumption as efficiently as possible. c. Staff members must not have lawns or gardens that need to be watered (small vegetable gardens are permitted on the site). d. All pipes must be well maintained and leaks must be repaired immediately. e. All taps must be turned off after it had been used. f. A water meter must be installed and it must be checked regularly to keep a register of water consumption and to monitor trends. g. Special care should be taken to prevent chemicals from washing/leaching into surface or groundwater systems. h. During operations, it should be ensured that the conditions as stated under the Waste Water Permit obtained are adhered to at all times.

4.2.4. Energy Management	
Responsible Person	Measures
The Proponent, Contractor, Builders and Manager	<ul style="list-style-type: none"> a. Electricity must be obtained from approved electrical suppliers to ensure efficiency of generation and use as well as sustainability of supply. b. Gas must be used as alternative to electricity in kitchens due to its efficiency and low pollution factor.

	<ul style="list-style-type: none"> c. They may only use a generator as emergency source of electricity as continued operation thereof normally creates additional noise, require the bulk storage of fuel and oil which can have a negative impact on the environment if not managed properly. d. When fires are used on the site, the workforce must make use of alien-invasive wood that is readily available for example wood that comes from bush encroaching species for example <i>Acacia melifera</i>. The workers must avoid using Mopani, Leadwood or other species that might be harvested unsustainably. e. The workers may not buy wood from the local people since that might lead to increased deforestation by cutting down protected species or the natural forests.
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4.2.5. Nature Conservation	
Responsible Person	Measures
The Proponent and Manager	<p>To sustain the natural attributes on the site, it needs to be preserved and protected to the best of their abilities. The manager has a key responsibility in protecting the environmental aspects on the site and the following measures should be taken:</p> <ul style="list-style-type: none"> a. There must be adequate waste management control. b. There must be adequate water management control. c. The workforce/manager/proponent must refrain from planting alien plants. d. A general environmental awareness must be established amongst staff members/workers and visitors.

4.2.6. Maintaining Sense of Place

Responsible Person	Measures
The Proponent and Manager	<p>Sense of place is seen as the style of the area, the atmosphere present when entering the site and the general “ambiance” of the place. The “sense of place” normally differentiates one area from the other and therefore management must avoid the following:</p> <ul style="list-style-type: none">a. They may not make use of any inappropriate décor for example bright or clashing colors, unattractive murals or art, unnecessary statues, etc.b. No shabbiness may be experienced on the site; management must make sure that they abstain from untidiness, un-emptied ashtrays, rubbish bins etc.c. The manager must repair and maintain all infrastructure since un-repaired infrastructure creates a poor impression.d. Waste must be properly managed on the site; visitors and residents may not smell rubbish bins. The manager must keep drains clean in order to avoid unpleasant smells.e. The site may not have many signs or objects that distract tourists driving past the site from the natural beauty of the area.f. No scrap metal for example old vehicles or equipment may lie around in various states of disrepair, the site must be clean and neat.g. The manager may not allow overcrowding at the site since this will destroy sense of place in a way that it will takes away the feeling of exclusivity.h. There may be no people loitering around at the site, whether visiting staff or looking for work.

4.2.7. Community Relations	
Responsible Person	Measures
The Proponent and Manager	<ul style="list-style-type: none"> a. The manager must have sound relations with communities in the vicinity. b. They may not damage any cultural or archaeological sites. c. They must employ as many local people as possible for all levels of operation. d. They must make use of dispute resolution methods and labour practices that are within the law and cultural norms. e. All staff must be trained in order that they have the knowledge to do their work properly. f. The manager must provide opportunities for career advancement and skills development.

4.2.8. Occupational Health & Safety Issues & Hospital Services	
Responsible Person	Measures
The Proponent, Manager and Workforce	<ul style="list-style-type: none"> a. Potential accidents may require the use of emergency services and hospital facilities nearby. b. Personnel on site should be trained in handling emergencies such as response to fire, accidents etc. c. There should be careful planning of emergency procedures. d. Training in first aid and emergency response to employees on site should be done. e. The Labour Act (No. 6 of 1992) makes certain provisions with regard to occupational health and safety, e.g. in relation to hazardous substances. f. In particular it is expected that workers will need to be protected against dust and noise in the work place.

4.2.9. Danger from the Surrounding Environment	
Responsible Person	Measures
The Proponent, Manager and Workforce	a. Weather-related or other environmental sources of danger may arise, for example from flooding, earthquakes, storms, power outage, heavy rainfall or frost. Site-related sources of danger such as the effect of neighbouring businesses/farms and the traffic must also be taken into account.

4.2.10. Fuel, Transport and Storage	
Responsible Person	Measures
The Vehicle Drivers, Builders, Contractors	<ul style="list-style-type: none"> a. Vehicles that transport materials to and from the site must be road worthy. b. All drivers that transport materials must have a valid driver's license and must at all times adhere to traffic rules and regulations. c. Vehicles carrying loads must be properly secured in order to completely avoid items falling off the vehicle at any time. d. Fuels, paints, solvents and chemicals must be stored in watertight containers that will ensure it cannot react with each other or be spilled onto the ground.

4.2.11. Spillages of potentially toxic materials

Responsible Person	Measures
The Developer, Builders and Workforce	<ul style="list-style-type: none">a. Any spillages of potentially toxic materials, whether by accident or through negligence, must be reported and the corrective action must be undertaken to 'clean' and to remove the evidence of the spillage.b. Make use of design structures and transfer equipment so as to avoid spillage as far as possible.c. Train the staff members on how to make use of diesel/fuel transfer and to avoid spillage. Fuel storage should be banded.d. Any spill must be cleaned up immediately by removing the spill together with the polluted soil and disposing of it at a recognized dumping site or facility.e. Install oil traps in all appropriate places to collect potentially toxic materials.f. When there is made use of diesel generators on site it must be placed on concrete slabs.g. When a workshop is introduced, the entire work area must be lined by concrete.h. Any runoff from the work areas either arising from wash downs or rainfall must be channeled into a pollution control pond.i. There must be a weekly monitoring of all equipment namely a visual check; there must also be a weekly monitoring of work areas.

4.3. DECOMMISSIONING/CLOSURE PHASE

The decommissioning phase normally follows the operational phase. This is a site-specific plan developed to ensure that appropriate environmental management practices are followed during the decommissioning phase of this project and to detail remediation, site control, and monitoring activities that will continue once the project/infrastructure is no longer required/needed.

The decommissioning phase:

- Provide effective, site-specific, and implementable procedures and mitigation measures to monitor and control environmental impacts throughout this phase of the project, such that the related activities do not adversely impact amenity, traffic, or the environment in the surrounding area.
- Establish long-term management of the project site for its next intended use, detailing plan for site assessment, remediation of contamination, and ecological restoration activities.
- Eliminate the long-term liability issues related to the site for the proponent or owner of the facility or project site.

4.3.1. Equipment

Responsible Person	Measures
The Proponent, Manager and the Environmental Control Officer	<ul style="list-style-type: none">a. An investigation on the soil and groundwater contamination must be conducted to determine the presence, nature and extent of any contamination. This will provide information as to the current status of the site in terms of the level of contamination, which will influence the level or type of remediation that needs to be undertaken.b. Prior to the infrastructure being destroyed, all residue products must be carefully removed for recycling or safe disposal.c. Solid materials must be used for filling. Only clean soil should be used for filling purposes.

4.3.2. Stormwater and Wastewater Management

Responsible Person	Measures
The Proponent, Manager and the Environmental Control Officer	<ul style="list-style-type: none"> a. Water used for flushing the pipes and tanks must be disposed of safely if it is not suitable for disposal via the sewer system. The relevant department must be contacted with regard to the discharge of water containing waste to the sewer system. b. The water containing waste must pass through a separator before discharge could be allowed. c. Any water containing waste should not contaminate clean storm water.

4.3.3. Waste Management

Responsible Person	Measures
The Proponent, Manager and the Environmental Control Officer	<ul style="list-style-type: none"> a. Solid waste generated from the removal of fences, infrastructure or tanks must be handled according to the precautionary principle meaning that waste (including soils, metals and other material) should be treated as hazardous unless proven otherwise. b. Contaminated soil and other waste material must be disposed of at an authorized/permitted landfill site. c. Waste must not be allowed to be stockpiled on the site for extensive periods but must be disposed off as generated/soon as possible. d. If waste material is stockpiled temporarily on site, it must be adequately protected from the environment to prevent leaching of potentially harmful contaminants.

4.3.4. Spillage	
Responsible Person	Measures
The Proponent, Manager and the Environmental Control Officer	a. Spillages during the decommissioning must be reported to the relevant authorities.

4.3.5. Remediation	
Responsible Person	Measures
The Proponent, Manager and the Environmental Control Officer	<ul style="list-style-type: none"> a. Clean-up or remediation of any contamination must be done. b. The owner of the land, the person in control of land or the person who occupies or uses the land on which pollution has occurred is not absolved from the responsibility of any further and/or associated pollution arising from this property. c. Should there be a risk to downstream users or the environment from this site in the future, it would be requested that further remedial measures be instituted at this site.

4.3.6. Site Rehabilitation	
Responsible Person	Measures
The Proponent, Manager, Contractor and the Environmental Control Officer	<ul style="list-style-type: none"> a. It should be ensured that all structures, equipment, materials, waste, rubble, notice boards and fences used during the construction and operation and decommissioning be removed with minimum damage to the surrounding and receiving area or environment. b. The site should be cleaned and cleared to the satisfaction of the ECO. c. In the case of accidental spills of oil or chemicals in the construction camp, the affected soil should be dug out and removed from the site for disposal at a hazardous waste site and replace with fresh topsoil.

4.3.7. Health and Safety of the Workers	
Responsible Person	Measures
The Contractor, Builders, Workforce, Constructors and Developers	<ul style="list-style-type: none"> a. The safety and security of labourers in the decommissioning phase of the project are required and of high importance. b. The Contractor shall comply with all standard and legally required health and safety regulations as promulgated under the Occupational Health and Safety Act and Labour Act and associated regulations. c. The Contractor must provide and maintain personal protective equipment and facilities to employees working with hazardous chemical substances. d. The Contractor shall provide a standard first aid kit at the site and/or at additional identified locations where needed. e. Disturbed soils, slopes and areas of open excavation must be minimised to avoid wind erosion.

	<ul style="list-style-type: none">f. A health and safety officer should again be employed to manage, coordinate and monitor risk and hazard and report all health and safety related issues in the work place.g. Conversely, it is anticipated that the process should not affect the overall health of persons related to the project including the neighbours.
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5. ENVIRONMENTAL STATEMENT/AGREEMENT

After all assessing was done and information available was reviewed, the conclusion was reached that the operation of a Material Recycling Facility (MRF) and the facilities for the storage and handling of oil and petroleum products on Portion S of Windhoek Town & Townlands No. 31, Windhoek, Khomas Region will have a low significance impact rating. The operation will have a positive impact on the economic and financial and waste disposal needs of the residents of Windhoek. The project will not have a large negative impact on the environment, and it is therefore recommended to proceed with the process. The activities associated with the development will exert a general low impact on the environment and are easily manageable as long as the impact on the environment is mitigated through the implementing of the Environmental Management Plan (EMP) as proposed in this document. Management actions prescribed and recommended in this EMP are especially designed to minimize or manage the impacts exerted by the activities and operations and the staff members working on the site.

It should however be noticed that the management activities should further be strengthened with continuous and well-orchestrated monitoring of the implementation of the given EMP. The manager/proponent needs to understand the severity of the situation and all efforts should be made to ensure that the message is conveyed to the workforce and visitors.

It should further be noted the proposed EMP will have little or no value in managing the impacts of the activities on the environment if it is not implemented by the proponent and not monitored by the responsible authorities. **It is thus suggested that the level of implementation of the EMP is audited at regular intervals by the Environmental Control Officer of the MEFT in order to ensure that remedial actions are taken on time and on a continues basis.**

The Ministry of Environment, Forestry and Tourism is herewith requested to accept and approve the EMP for the Environmental Clearance (EC) for the operation of a Material Recycling Facility (MRF) and for the facilities for the storage and handling of oil and petroleum products on Portion S of Windhoek Town & Townlands No. 31, Windhoek, Khomas Region and to issue the project with an Environmental Clearance Certificate for the proposed operations.