REPUBLIC OF NAMIBIA

MINISTRY OF ENVIRONMENT, FORESTRY AND TOURISM

DIRECTORATE OF ENVIRONMENTAL AFFAIRS

ENVIRONMENTAL AUDIT - (SELF AUDIT QUESTIONNAIRE)

Please Take Note:

1. All questions are mandatory and thus must be fully completed.
2. knowingly providing false or misleading information is an offence as in terms of Section 43 (1) of the Environmental Management Act, Act No. 7 of 2007.

Activity:

Continuation of the mining for mineral dimension stone (i.e. marble and granite) on ML 142 held by Namibia Marble and Granite (PTY) Ltd. (NAMAGRA).

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1. OVERVIEW AND GENERAL INFORMATION	
a) Name of the unit and complete address	ML 142 is located on private land, Farm Habis No. 71, situated within the Karibib District, Erongo Region.
b) What are the main activities carried out on site?	The activities undertaken at ML 142 are mining (quarrying) of mineral dimension stone (i.e. marble and granite).
c) Number of people employed on site (temporary + permanent)	30
d) Is a copy of the site layout plan available?	Yes
e) Are there any other projects in the area having similar activities?	Yes
f) Environmental Clearance Certificate (ECC) Number and date issued (if available)	ECC – 01178 issued on 29 January 2021

2. SITE HISTORY AND DETAILS	
a) When was the facility established?	Since the early 1990`s
b) Who owns the facility/industry?	Namibia Marble and Granite (PTY) Ltd. (NAMAGRA)
c) Who owns the land and what is the type of the land?	Farm Habis
d) Is the land ownership/lease document available?	Yes
e) What is the total land area?	180ha
f) What was the previous land use of that area (commercial, residential, industrial or agricultural)?	Agriculture
g) Does the facility have any citations or complaints pending against it?	No
h) Has there ever been any major accidents on-site?	No

3. PROCESS REVIEW	A	N/A	Comments
a) Give a detailed description of the production process.	X		The mining operations are considered to be a small operation taking up 2 hectares of land. The activity entails the cutting of stone, storage on-site and transportation of blocks from ML 142 to Walvis Bay harbor for export.
b) Total production capacity of the plant/ project in terms of ton per annum	X		Approx 96,000 tons
c) What are the inputs required in the production process (preferably in the form of a list containing name, amount/quantity required and their price?	X		List attached – Annexure A.
d) What are the outputs produced (including pollutants) and their quantities?	X		10-15% recovery in rough marble blocks.
e) Provide a list of all the machinery and utilities used on-site along with their capacities number, energy. f) consumption and time in use.	X		List attached – Annexure B.
g) How often is maintenance work carried out on-site?	X		
h) Does any recycling/reuse of material take place on-site?	X		Yes. Solid waste is separated into recyclable groups such as glass, plastic and paper. These recyclable items together with any other hazardous effluent e.g. oil, grease etc. is collected in drums and transported to Walvis Bay or Swakopmund where it is sold to recyclers and or disposed at the municipal landfill site.

4. LICENSE AND PERMITS	A	N/A	Comments
a) Does the facility have a valid factory license? If not, has the facility applied for it? Is a copy of the application form available?		X	Mining Operations

b) Does the facility have a valid Consent to Operate (CTO) certificate? If not, has the facility applied for it? Is a copy of the application form available?	X		Mining License ML 142 issued by Ministry of Mines And Energy.
c) Does the facility generate hazardous waste? If it does, does the facility have authorization for storage, handling and transportation of hazardous waste as per the Hazardous Waste (Management and Handling) Rules? If not, has the facility applied for it? Is a copy of the application available?	X		No

5. AIR EMISSIONS	A	N/A	Comments
a) What are the sources of stack and fugitive emissions in the facility?		X	
b) Has stack and ambient monitoring carried out?		X	
c) Does emissions meet standards specified in the CTO certificates?		X	
d) Are monitoring records/reports maintained?		X	
e) What are the air pollution control device that has been installed?		X	
f) What is the frequency of cleaning and maintaining the air pollution control device?		X	
g) Are site processes and operations free of significant fugitive air emissions?	X		Yes

6. Water consumption and wastewater generation

6.1 Freshwater	A	N/A	Comments
a) What is the source of freshwater? Is it metered or not?	X		Water for mining operations is trucked-in from the NAMWATER Pipeline take-off along the Main Road C32, located 20km from the Mine. The water is stored on-site, while water for human consumption purpose is obtained from a borehole owned by the Farm owner.
b) How many boreholes are installed in the site?	X		None
c) How many flow meters are installed in the plant? What are their readings?	X		None
d) Schematic of a raw water treatment plant and DM plant e.g. Sceptic tanks, filtering systems etc.		X	
e) Latest groundwater quality test reports		X	
f) Specify average daily water consumption of the entire plant and in township/colony (m3/day):	X		6M3
g) Has the plant / activity studied the impact of its water consumption on respective surface water source and/or groundwater table?		X	
h) Break-up of average freshwater consumed for last two financial years?	X		Approx 200M3
i) Specific water consumption values for last two financial years (in m3/ton or m3/Mwh, etc.):	X		Approx 1000M3
j) Chemicals used in water treatment plant with quantity and price:		X	
k) What is the capacity of the demineralization (DM) plant? What is then average quantity of water treated in DM plant (m3/day)?		X	

l)	Does the plant/ project have rainwater harvesting (RWH) system? If it does, is it rooftop, paved or unpaved?	X		Rainwater collect on marble floor inside mining pit.
m)	Method of harvesting rainwater—Storage in artificial tanks/recharge into the pit/ trench/well	X		Store in tanks and re-used in mining processes.
n)	Total rainwater harvesting potential of the plant	X		Up to 500,000M3
o)	Rainwater harvesting potential of the site developed by the plant:	X		None
p)	Total rainwater harvesting done by the plant	X		None
q)	Frequency of monitoring of the groundwater quality and quantity (pre- and post-monsoon) and frequency of cleaning the rainwater harvesting catchment/storage system	X		Monthly

r)	How is the harvested rainwater utilized by the plant/ project?	X		Cutting of Marble blocks
s)	Key measures taken by the plant/project for water conservation in the past three years and water saving achieved in terms of m3	X		Continuous recycling

6.2 Wastewater	A	N/A	Comments
a) Schematic diagram of an Effluent Treatment Plant (ETP) and Sewage Treatment Plant (STP) along with their capacities (attach)		X	
b) Latest laboratory test reports of ETP and STP inlet/outlet streams		X	
c) Does the plant/ project have separate ETP for its different products?		X	
d) Total effluent generated by plant/ project (including all products) in last two financial years		X	
e) Total sewerage generated by plant/ project and colony in last two financial years		X	
f) Provide the details of wastewater generation and recycling in the entire facility		X	
g) Does the plant/ project monitor the impact of wastewater on the receiving waterbody/ land?		X	
h) What is the total number of outlets for effluent discharge from the plant/ project?		X	
i) Name of WTP unit/s (filtration unit/softening unit/reverse osmosis plant etc.) and its capacity and average quantity of water treated in filtration plant (m3/day)		X	

7. NOISE POLLUTION	A	N/A	Comments
a) Does the facility have a valid factory license? If not, has the facility applied for it? Is a copy of the application form available?		X	

8. FUEL CONSUMPTION	A	N/A	Comments
a) List the different type of fuel used in different areas of the plant/ project	X		Diesel
b) Quantification of fuel used in each process and its calorific value	X		Approx 20lt/hrs
c) How is the industry storing the different types of fuel?	X		Above ground storage tanks.
d) If they are using:			
Gas—Is the supply regular? If not, mention the number of hours.		X	
Biomass—Is it available for the entire year?		X	
Coal—Are they using low ash coke or high coke, and the supply is regular or not?		X	

9. CHEMICAL HANDLING AND STORAGE	A	N/A	Comments
a) What are the various types of chemicals stored on-site?		X	
b) Is a list of chemicals available?		X	
c) How are chemicals transported?		X	
d) What kind of containers are there for storing the chemicals?		X	
e) Are there any above or underground chemical storage tanks on-site?		X	
f) Are any of the chemical's toxic or harmful? How many of them are hazardous?		X	
g) Are all the chemicals labelled?		X	
h) Are the chemical containers' lid closed after use?		X	
i) Are records of chemicals and dyes usage maintained in the logbook?		X	

10. SOLID AND HAZARDOUS WASTE MANAGEMENT	A	N/A	Comments
a) What kinds of solid waste are generated on-site?	X		Sewerage from toilets.
b) What is the quantity of solid waste generated?	X		Approx 20,000m3 per annum.
c) How is the solid waste disposed of?	X		Transported to facilities in Karibib.
d) Is any of the waste reused or recycled?		X	
e) What are the sources of hazardous waste generation on-site?	X		Maintenace of machinery.
f) What is the quantity of hazardous waste generated?	X		Approx 2,000 m3 per annum.

g)	How is the hazardous waste disposed of?	X		Hazardous effluent i.e. oil, grease etc. is collected in drums and transported to Walvis Bay or Swakopmund where it is sold to recyclers and or disposed at the municipal landfill site.
h)	Are hazardous waste disposal records maintained?	X		Yes
i)	Are any of the hazardous wastes treated on-site?	X		No
j)	Where are the hazardous wastes stored before disposal?	X		Above ground tanks.

11. OCCUPATIONAL HEALTH AND SAFETY		A	N/A	Comments
a)	Does the facility have a site emergency plan?	X		Yes
b)	If yes, then has this plan been documented?	X		Yes
c)	What are the recognized hazards in the facility?	X		Ignorance.
d)	Are fire extinguishers available in the facility?	X		Yes
e)	What type of fire extinguisher is available?	X		Mono Ammonium Phosphate base.
f)	Are the fire extinguishers functional?	X		Yes
g)	Are facility personnel trained in its use?	X		Yes
h)	Is personal protective equipment (PPE) available for use?	X		Yes
i)	Do the workers use PPE?	X		Yes
j)	Are health check-ups for workers conducted?	X		Yes
k)	Do the workers know whom to contact in case of an emergency?	X		Yes
l)	Has any accident ever occurred on-site?	X		Yes

Declarations

I Namibia Marble and Granite (PTY) Ltd. (NAMAGRA) (full name of **PROPONENT**) understand and agree that the information that I have provided in this questionnaire will be used by the Environmental Commissioner. I accept that the Environmental Commissioner will hold me accountable for any inaccurate or misleading information knowingly provided in this questionnaire and acknowledge that the provision of such information will impede the lawful carrying out of the responsibilities and functions of the Environmental Commissioner.

I declare that the information that I have provided in this questionnaire is to the best of my knowledge, true and reliable.

Signature:.....

Date: 02/02/2024

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23/02/2024

Annexure A

Requirements in Production Process

Requirements	Cost/Item	Total used
Fuel	N$ 19.092/Lt	844,607 Lt
Lubricants	N$45.00/Lt	2,500 Lt
Diamond Wire	N$ 516.75/m	2,160m
Benetti Parts	Various	300 units
Fantini Parts	Various	276 units
Labour		30 Employees
Barloworld Parts	Various	Caterpillar plant

General Manager
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Annexure B

List of Machinery

Type	Make	Consumption
Excavator	JCB	5,400
Excavator	Caterpillar	7,500
Excavator	Caterpillar	6,480
Excavator	Caterpillar	8,200
Excavator	Hitachi	5,400
Excavator	Liebherr	3,250
Excavator	Liebherr	2,800
Front end loader	JCB	9,450
Front end loader	JCB	12,550
Front end loader	JCB	16,450
Front end loader	Caterpillar	79,200
Front end loader	Caterpillar	72,000
Front end loader	Caterpillar	86,400
Dump Truck	Caterpillar	43,200
Dump Truck	Bell	48,600
Skid Steer	Caterpillar	8,640
Generator	Caterpillar	7,200
Generator	Caterpillar	8,500

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