APP-002802

STORAGE AND HANDLING OF INDUSTRIAL CARGO ON ERVEN 5194 AND 5195 IN THE LIGHT INDUSTRIAL AREA OF WALVIS BAY, ERONGO REGION

ENVIRONMENTAL MANAGEMENT PLAN



Assessed by: Assessed for:





Project:	STORAGE AND HANDLING OF INDUSTRIAL CARGO ON ERVEN			
	5194 AND 5195 IN THE LIGHT INDUSTRIAL AREA OF WALVIS BAY,			
	ERONGO REGION: ENVIRONMENTAL MANAGEMENT PLAN			
Report:	Final			
Version/Date:	February 2024			
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Cite this	Faul A; Bosman Q; Strauss J; 2024 February; Storage and Handling of Industrial			
document as:	Cargo on Erven 5194 and 5195 in the Light Industrial Area of Walvis Bay,			
	Erongo Region: Environmental Management Plan			
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1 BACKGROUND AND INTRODUCTION

Geo Pollution Technologies (Pty) Ltd was appointed by Wesbank Transport, a Division of FP du Toit Transport (Pty) Ltd (referred to as the Proponent or Wesbank Transport) to prepare an environmental scoping assessment (EIA) and environmental management plan (EMP) for their proposed industrial cargo storage and handling operations on erven 5194 and 5195, corner of Cargo and Inventory Street, in the light industrial area of Walvis Bay. The Proponent's proposed operations includes the construction of two warehouses for the storage, handling and transport of manganese dioxide, iron oxide and soda ash. For purposes of this assessment, these goods are referred to as industrial cargo which can thus include any one or a combination of the mentioned products. The industrial cargo will be imported via the Port of Walvis Bay and will be temporarily stored on erven 5194 and 5195 by the Proponent.

2 ENVIRONMENTAL MANAGEMENT PLAN

The EMP provides management options to ensure impacts of the facility are minimised. An EMP is a tool used to take pro-active action by addressing potential problems before they occur. This should limit the corrective measures needed, although additional mitigation measures might be included if necessary. The environmental management measures are provided in the tables and descriptions below. These management measures should be adhered to during the various phases of the operation of the facility. This section of the report can act as a stand-alone document. All personnel taking part in the operations of the facility should be made aware of the contents in this section, so as to plan the operations accordingly and in an environmentally sound manner.

The objectives of the EMP are:

- to include all components of construction activities (upgrades, maintenance, etc.) and operations of the facility;
- to prescribe the best practicable control methods to lessen the environmental impacts associated with the project;
- to monitor and audit the performance of operational personnel in applying such controls; and
- to ensure that appropriate environmental training is provided to responsible operational personnel.

2.1 IMPLEMENTATION OF THE EMP

Various potential and definite impacts will emanate from the operations, construction and decommissioning phases. The majority of these impacts can be mitigated or prevented. The impacts, risk rating of impacts as well as prevention and mitigation measures are listed below.

As depicted in the tables below, impacts related to the operational phase are expected to mostly be of low to medium significance and can mostly be mitigated to have a low significance. The extent of impacts are mostly site specific to local and are not of a permanent nature. Due to the nature of the surrounding areas, cumulative impacts are possible and include noise pollution and traffic impacts.

2.1.1 Planning

During the phases of planning for construction, operations and decommissioning of the facility, it is the responsibility of Proponent to ensure they are and remain compliant with all legal requirements. The Proponent must also ensure that all required management measures are in place prior to and during all phases, to ensure potential impacts and risks are minimised. The following actions are recommended for the planning phase and should continue during various other phases of the project:

• Ensure that all necessary permits from the various ministries, local authorities and any other bodies that governs the construction (maintenance) and operations of the facility are in place and valid.

- Ensure all appointed contractors and employees enter into an agreement which includes the EMP. Ensure that the contents of the EMP are understood by the contractors, subcontractors, employees and all personnel present or who will be present on site.
- Make provisions to have a Health, Safety and Environmental Coordinator to implement the EMP and oversee occupational health and safety as well as general environmental related compliance at the site.
- Make provisions to have a community liaison officer on site who will handle complaints and community input, and through whom, where reasonable, monitoring data can be requested. Communicate the contact details of the community liaison officer to interested and affected parties when the project is initiated.
- Have the following emergency plans, equipment and personnel on site where reasonable to deal with all potential emergencies:
 - o Risk management / mitigation / EMP/ Emergency Response Plan and HSE Manuals;
 - o Adequate protection and indemnity insurance cover for incidents;
 - o Comply with the provisions of all relevant safety standards;
 - o Procedures, equipment and materials required for emergencies.
- If one has not already been established, establish and maintain a fund for future ecological restoration of the project site should project activities cease and the site is decommissioned and environmental restoration or pollution remediation is required.
- Establish and / or maintain a reporting system to report on aspects of construction activities, operations and decommissioning as outlined in the EMP.
- Prepare and submit environmental monitoring reports as per the conditions of the environmental clearance certificate.
- Appoint a specialist environmental consultant to update the EIA and EMP and apply for renewal of the environmental clearance certificate prior to expiry.

2.1.2 Skills, Technology and Development

During various phases of construction and operations, training will be provided to a portion of the workforce. Skills are transferred to an unskilled workforce for general tasks. The technology required for the development of the facility is often new to the local industry, aiding in operational efficiency. Development of people and technology are key to economic development.

<u>Desired Outcome:</u> To see an increase in skills of local Namibians, as well as development and technology advancements in associated industries.

Actions

Enhancement:

- If the skills exist locally, contractors must first be sourced from the town, then the region and then nationally. Deviations from this practise must be justified.
- Skills development and improvement programs to be made available as identified during performance assessments.

Responsible Body:

- Proponent
- Contractors

- Record should be kept of training provided.
- Ensure that all training is certified or managerial reference provided (proof provided to the employees) inclusive of training attendance, completion and implementation.
- Bi-annual summary report based on records kept.

2.1.3 Revenue Generation

The project will change the way revenue is generated and paid to the national treasury. An increase of skilled and professional labour will result from the operations of the project and related wages and salaries will be paid. Employment at the warehouse will be sourced locally as far as practically possible while transport companies / drivers may be contracted from other regions in order to transport cargo from Walvis Bay. Revenue will be generated through the provision of port and related services such as stevedore operations.

<u>Desired Outcome:</u> Contribution to the local and national economy. Contribution to national treasury.

Actions

Enhancement:

• The Proponent must employ local Namibians and source Namibian contractors, goods and services as far as is practically possible. Deviations from this practise must be justified.

Responsible Body:

Proponent

Data Sources and Monitoring:

• Bi-annual summary report based on employee records.

2.1.4 Employment

An increase of skilled and professional labour will result from the operations of the project. Employment will be sourced locally as far as practically possible.

<u>Desired Outcome:</u> Provision of employment to local Namibians.

Actions

Mitigation:

• The Proponent must employ local Namibians where possible. If the skills exist locally, employees must first be sourced from the town, then the region and then nationally.

Responsible Body:

Proponent

Data Sources and Monitoring:

• Bi-annual summary report based on employee records.

2.1.5 Demographic Profile and Community Health

The project is reliant on labour during the construction and operational phases. Local construction teams in Walvis Bay will be used for all construction, general maintenance and upgrade activities. The scale of the construction portion of the project is limited and it is not expected to create a change in the demographic profile of the local community. Community health may be exposed to factors such as communicable disease like HIV/AIDS and alcoholism/drug abuse, associated with the trucking industry (transport of goods to and from Walvis Bay) and increased spending power of the labour force. Trucks delivering products to the warehouse will not stay for extended periods of time at the site, however, may reside overnight in Walvis Bay. Foreign persons in the area may increase the cumulative risk of communicable disease (such as HIV/ AIDS) in Walvis Bay.

Positive impacts will related to employees and contractors' increased economic resilience and improved livelihoods.

<u>**Desired Outcome:**</u> To prevent the in-migration and growth in informal settlements, prevent the spread of communicable disease and prevent / discourage socially deviant behaviour.

Actions:

Prevention:

- Employ local people from the area where possible, deviations from this practise should be justified appropriately.
- Adhere to all municipal by-laws relating to environmental health which includes, but is not limited to, sanitation requirements for workers on site.
- Appointment of reputable contractors.

Mitigation:

• Educational programmes for employees (especially truck drivers) on HIV/AIDs and general upliftment of employees' social status.

Responsible Body:

Proponent

- Facility inspection sheet for all areas which may present environmental health risks, kept on file.
- Bi-annual summary report based on educational programmes and training conducted.
- Bi-annual report and review of employee demographics.

2.1.6 Health, Safety and Security

Activities associated with the construction an operational phases are reliant on human labour and therefore exposes them to health and safety risks. Activities such as the operation of machinery, unsafe stacking, falling from heights and handling of hazardous chemicals (inhalation of dust and potential health effects chemicals), poses risks to employees. If not contained, windblown industrial cargo dust may further pose health risk to nearby receptors.

Security risks are related to unauthorized entry, theft and sabotage. Security risks are increased as a result of high value commodities.

<u>Desired Outcome:</u> To prevent injury, health impacts and theft.

Actions

Prevention:

- All Health and Safety standards specified in the Labour Act, or better, should be followed.
- Clearly label dangerous and restricted areas as well as dangerous equipment and products.
- Provide all employees with required and adequate personal protective equipment (PPE) including dust masks and protective clothing for workers in close proximity to, or working with, the dust producing cargo. Accidental inhalation, ingestion, dermal or eye contact with dust must be prevented at all times.
- Ensure that all personnel receive adequate training on operations of equipment / handling of industrial cargo.
- Equipment on site must be stored in a way that does not encourage criminal activities (e.g. locked away to prevent theft).
- Appoint reputable contractors for transporting of cargo who prioritise the safety and wellbeing of the truck drivers and the community.
- Security procedures and proper security measures must be in place to protect workers and clients.
- Strict security that prevents unauthorised entry.

Mitigation:

- Selected personnel should be trained in first aid and a first aid kit must be available on site. The contact details of all emergency services must be readily available.
- Implement and maintain an integrated health and safety management system, to act as a monitoring and mitigating tool, which includes operational, safe work and medical procedures, permits to work, emergency response plans, housekeeping rules, MSDS's and signage requirements (PPE, flammable etc.).
- Implement emergency response procedures in case of incidents.
- Dust suppression when required.
- Emergency wash stations in case of accidental exposure to chemicals or dust.

Responsible Body:

- Proponent
- Contractors

- Industry standards, clients' EMPs and protocols, etc.
- A bi-annual report should be compiled of all incidents reported. The report should contain dates when training were conducted and when safety equipment and structures were inspected and maintained.

2.1.7 Traffic

The operations of the client increases the volume of trucks on the national road networks. The warehouse is within an area zoned for light industrial use and operations will result in an increase in traffic along Inventory and Cargo Street. Heavy motor vehicles turning in these roads may result in an increased, cumulative impact on the road surface of the area. Trucks may block neighbouring business' entrances and increase the likelihood of accidents and incidents.

Desired Outcome: Minimum impact on traffic and no transport or traffic related incidents.

Actions

Mitigation:

- Trucks delivering or collecting goods should not be allowed to obstruct any traffic in surrounding areas and the town.
- Trucks associated with the facility should not be allowed to park or overnight in Inventory or Cargo Street, and may only overnight at areas designated for this purpose.
- ♦ Adhere to The Road Traffic and Transport Regulations, 2001 and all other applicable legislation related to road transport and maximum axle loads.
- If any traffic impacts are expected, traffic management should be performed to prevent these.
- The placement of signs to warn and direct traffic will mitigate traffic impacts.

Responsible Body:

Proponent

- ♦ The Road Traffic and Transport Regulations, 2001.
- Any complaints received regarding traffic issues should be recorded together with action taken to prevent impacts from repeating itself.
- A bi-annual report should be compiled of all incidents reported, complaints received, and action taken.

2.1.8 Air Quality Related Impacts

Reduced air quality as a result of exhaust gases (greenhouse gases) of trucks visiting the property. This may have localised health impacts, but are expected to disperse relatively quickly due to the prevailing south-westerly winds in Walvis Bay. It will however still contribute to greenhouse gas emissions that in turn contribute to climate change. In terms of greenhouse gas emissions from trucks, it is the project in its entirety that should be considered. It is thus the responsibility of all stakeholders to implement strategies and measures to curb the release of greenhouse gases.

Air quality as a result of windblown dust can cause health effects, especially through chronic inhalation of such dust, in the nearby communities. The risk is related to the toxic/irritant nature respirable fractions (PM10) and thoracic fraction (PM2.5) of dust when cargo is not contained.

<u>Desired Outcome:</u> To prevent health impacts and to reduce greenhouse gas emissions.

Actions

Prevention:

- ♦ All cargo must be suitably contained and secured to prevent product loss and dust.
- Forklift operators to be suitably trained.

Mitigation:

- Spilled products must be cleaned immediately.
- Dust suppression in the warehouse if ever required.
- All trucks must be service regularly and make use of technology to reduce emissions. This include selective catalytic reduction, diesel particulate filters and diesel oxidation catalysts.

Responsible Body:

- Proponent
- Contractors

- Any complaints received regarding dust must be recorded, investigated and the problem rectified.
- Any incidents must be recorded with action taken to prevent future occurrences.
- A bi-annual report should be compiled of all incidents and complaints reported. The report should contain dates when safety equipment and structures were inspected and maintained.

2.1.10 Fire

Construction and operational activities may increase the risk of the occurrence of fires if proper maintenance and housekeeping are not conducted. Industrial cargo dust (fines) suspended in the air can become flammable if present in excessive quantities.

<u>Desired Outcome:</u> To prevent property damage, possible injury and impacts caused by uncontrolled fires.

Actions:

Prevention:

- Ensure all materials are stored strictly according to MSDS instructions. This include segregation of incompatible products.
- ♦ Maintain regular site, mechanical and electrical inspections and maintenance.
- Clean all spills / leaks.
- Ensure sufficient firefighting and fire prevention measure are in place for the specific products being stored and handled in the warehouse. This includes specific fire suppressants compatible with the materials stored.
- Regularly update the firefighting and prevention plan and equipment according to the materials stored on site, keeping in mind the activities on neighbouring properties.
- If ever required, proper dust suppression to be conducted in the warehouse, if necessary, to prevent airborne dust (fines) that can become flammable if present in excessive quantities.

Mitigation:

- A holistic fire protection and prevention plan is needed for flammable products. This plan must include an emergency response plan, firefighting plan and spill recovery plan, and should include specific substances handled at the site. The plan should consider risks posed to and by neighbouring properties.
- Maintain firefighting equipment, implement good housekeeping and conduct personnel training (firefighting, fire prevention and responsible housekeeping practises).

Responsible Body:

- Proponent
- Contractors

- A register of all incidents must be maintained on a daily basis. This should include measures taken to ensure that such incidents do not repeat themselves.
- A bi-annual report should be compiled of all incidents reported. The report should contain dates when fire drills were conducted and when fire equipment was tested and training given.

2.1.11 Noise

Noise pollution will exist due to heavy motor vehicles accessing the site to load and offload cargo as well as from the stacking and moving of bags and containers and other large equipment. As the site is situated in a light industrial area, noise impacts on surrounding properties will be minimal. Construction (maintenance and upgrade) may generate excessive noise for short periods of time.

<u>Desired Outcome:</u> To prevent any nuisance and hearing loss due to noise generated.

Actions

Prevention:

- The Health and Safety Regulations of the Labour Act and World Health Organization (WHO) guideline on maximum noise levels (Guidelines for Community Noise, 1999) to prevent hearing impairment for workers on site should be followed during the construction and operational phases.
- Confine noise generating operational activities to daytime hours as far as possible.
- At night, the nuisance created by audible warning signals on trucks and forklifts can be prevented by switching to a flashing light or 'broadband white noise' system.

Mitigation:

- Hearing protectors as standard PPE for workers in situations with elevated noise levels.
- Maintain noise generating activities to within the warehouse as far as possible.
- All machinery must be regularly serviced to ensure minimal noise production.

Responsible Body:

- Proponent
- Contractors

- Health and Safety Regulations of the Labour Act and WHO Guidelines.
- Maintain a complaints register.
- Bi-annual report on complaints and actions taken to address complaints and prevent future occurrences.

2.1.12 Waste production

Various waste streams will result from the operational phase and development of the facility. Waste may include hazardous waste associated with the handling of hazardous products and contaminated packaging material (e.g. during construction and maintenance). Domestic waste will be generated by the facility and related operations. Waste presents a contamination risk and when not removed regularly may become a fire hazard. Construction waste may include building rubble and discarded equipment. Contaminated soil and water is considered as a hazardous waste.

<u>Desired Outcome:</u> To reduce the amount of waste produced, and prevent pollution and littering.

Actions

Prevention:

- Waste reduction measures should be implemented and all waste that can be re-used / recycled must be kept separate.
- Ensure adequate temporary waste storage facilities are available.
- Ensure waste cannot be blown away by wind.
- Prevent scavenging (human and non-human) of waste.
- All drains leading directly into sewers must be closed off, and locked where possible, to prevent any unwanted products from entering sewers should an accidental spill occur. Where drains are present to drain wash water, these should only be opened during times of washing.

Mitigation:

- Waste should be disposed of regularly and at appropriately classified disposal facilities, this includes hazardous material (empty chemical containers, contaminated rugs, paper water and soil).
- See the material safety data sheets available from suppliers for disposal of contaminated products and empty containers.
- Liaise with the municipality regarding waste and handling of hazardous waste.
- Due to the nature of some hazardous materials, they, or the containers they are packed in, should be disposed of in an appropriate way at an appropriately classified waste disposal facility. See the material safety data sheets available from suppliers for disposal methods.

Responsible Body:

- Proponent
- Contractors

- A register of hazardous waste disposal should be kept. This should include type of waste, volume as well as disposal method/facility.
- Any complaints received regarding waste should be recorded with notes on action taken. All information and reporting to be included in a bi-annual report.

2.1.13 Ecosystem and Biodiversity Impact

The nature of the operational activities is such that the probability of creating a habitat for flora and fauna to establish is low. No significant impact on the biodiversity of the area is predicted as the site is void of natural fauna and flora. Excessive lighting used at night and especially those that are directed upwards may however blind birds like flamingos that fly at night. This may result in disorientation of birds and collisions with structures. Further impacts will mostly be related to pollution of the environment.

Desired Outcome: To avoid pollution of and impacts on the ecological environment.

Actions.

Mitigation:

- Report any extraordinary ecological sightings to the Ministry of Environment, Forestry and Tourism.
- Mitigation measures related to waste handling and the prevention of groundwater, surface water and soil contamination should limit ecosystem and biodiversity impacts.
- Avoid scavenging of waste by fauna.
- The establishment of habitats and nesting sites at the facility should be prevented where possible.
- Lights used at night should be kept to a minimum and should be directed downwards to the working surfaces.

Responsible Body:

Proponent

Data Sources and Monitoring:

All information of extraordinary ecological sightings to be included in a bi-annual report.

2.1.14 Groundwater, Surface Water and Soil Contamination

Cargo that are not contained can contaminate the environment. The entire property will be paved and pollution of soil and groundwater is not expected. Dust that is not contained can reach sensitive receptors, like the nearby manmade wetlands, during times of strong wind. Oil, hydraulic fluid and fuel leaks from vehicles may also present a pollution risk.

<u>Desired Outcome:</u> To prevent the contamination of water and soil.

Actions

Prevention:

- Proper containment of cargo to prevent dust blown into the surrounding environment.
- Training of operators must be conducted on a regular basis (e.g. forklift operators).

Mitigation:

• Clean-up action must be taken immediately for all instances where dust is not contained (e.g. spillages and torn bags) or spillages occur (e.g. trucks leaking fuel or oil, or paints and solvents during construction and maintenance)

Responsible Body:

- Proponent
- Contractors

- The procedures followed to prevent environmental damage during service and maintenance, and compliance with these procedures, must be audited and corrections made where necessary.
- A report should be compiled bi-annually of all spills. The report should contain the following information: date and duration of spill, product spilled, volume of spill, remedial action taken, etc.

2.1.15 Visual Impact

This is an impact that not only affects the aesthetic appearance, but also the integrity of the facility. The site is within an area zoned for light industrial use. The development of the site is in line with the urban character.

Operations will be kept tidy and neat which will promote effectiveness and pollution prevention while being aesthetically pleasing.

<u>Desired Outcome:</u> To minimise aesthetic impacts associated with the facility.

Actions

Mitigation:

- Regular waste disposal, good housekeeping and routine maintenance on infrastructure will ensure that the longevity of structures are maximised and a low visual impact is maintained.
- All structures and infrastructures constructed on site should be line with the visual character of the landscape as far as practically possible.

Responsible Body:

- Proponent
- Contractors

Data Sources and Monitoring:

♦ A bi-annual report should be compiled of all complaints received and actions taken.

2.1.16 Cumulative Impact

The main cumulative impact associated with the operational phase is traffic frequenting the site. This will have a cumulative impact on traffic flow on surrounding streets.

The noise from the increase of traffic, and other noise generating activities in the area, may increase the noise impacts on nearby receptors. The facility is however situated in a light industrial area and noise is expected within reasonable limits. The cumulative effect of lighting on birds due to various industrial related developments will take place in future, may also increase the risk of collisions and interference with bird flight paths at night.

<u>Desired Outcome:</u> To minimise all cumulative impacts associated with the facility.

Actions

Mitigation:

- Addressing each of the individual impacts as discussed and recommended in the EMP would reduce the cumulative impact.
- Reviewing biannual and annual reports for any new or re-occurring impacts or problems would aid in identifying cumulative impacts and help in planning if the existing mitigations are insufficient.

Responsible Body:

Proponent

Data Sources and Monitoring:

• Review bi-annual summary reports based on all other impacts to gain an overall assessment of the impact of the operational phase.

2.2 DECOMMISSIONING AND REHABILITATION

Decommissioning is not foreseen during the validity of the environmental clearance certificate. Decommissioning was however assessed. Should decommissioning occur at any stage, rehabilitation of the area may be required. Decommissioning will entail the complete or partial removal of infrastructure including buildings and underground infrastructure not forming part of post decommissioning use. Any pollution present on the site must be remediated. The impacts associated with this phase include noise and waste production as structures are dismantled. Noise must be kept within Health and Safety Regulations of the Labour Act and WHO standards. Waste should be contained and disposed of at an appropriately classified and approved waste facility and not dumped in the surrounding areas. Future land use after decommissioning should be assessed prior to decommissioning and rehabilitation initiated if the land would not be used for future purposes. The EMP for the facility will have to be reviewed at the time of decommissioning to cater for changes made to the site and implement guidelines and mitigation measures.

2.3 ENVIRONMENTAL MANAGEMENT SYSTEM

The Proponent could implement an Environmental Management System (EMS) for their operations. An EMS is an internationally recognized and certified management system that will ensure ongoing incorporation of environmental constraints. At the heart of an EMS is the concept of continual improvement of environmental performance with resulting increases in operational efficiency, financial savings and reduction in environmental, health and safety risks. An effective EMS would need to include the following elements:

- A stated environmental policy which sets the desired level of environmental performance;
- ♦ An environmental legal register;
- An institutional structure which sets out the responsibility, authority, lines of communication and resources needed to implement the EMS;
- Identification of environmental, safety and health training needs;
- An environmental program(s) stipulating environmental objectives and targets to be met, and work instructions and controls to be applied in order to achieve compliance with the environmental policy;
- Periodic (internal and external) audits and reviews of environmental performance and the effectiveness of the EMS: and
- ♦ The EMP.

3 CONCLUSION

The EMP should be used as an on-site reference document for the operations of the facility. Parties responsible for transgressing of the EMP should be held responsible for any rehabilitation that may need to be undertaken. The Proponent could use an in-house Health, Safety, Security and Environment Management System in conjunction with the EMP. All operational personnel must be taught the contents of these documents.

Should the Directorate of Environmental Affairs (DEA) of the MEFT find that the impacts and related mitigation measures, which have been proposed in this report, are acceptable, an environmental clearance certificate may be granted to the Proponent. The environmental clearance certificate issued, based on this document, will render it a legally binding document which should be adhered to.