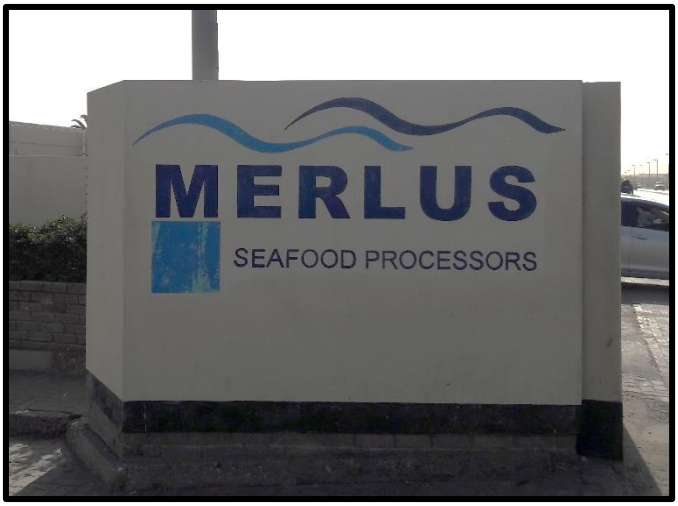
UPDATED ENVIRONMENTAL MANAGEMENT PLAN FOR THE OPERATIONAL ACTIVTIES OF MERLUS SEAFOOD PROCESSORS IN THE FISHING HARBOUR OF WALVIS BAY



Assessed by:

Assessed for:

August 2021

Project:	**UPDATED ENVIRONMENTAL MANAGEMENT PLAN FOR THE OPERATIONAL ACTIVTIES OF MERLUS SEAFOOD PROCESSORS IN THE FISHING HARBOUR OF WALVIS BAY**	
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Report Approval	 **André Faul** **Conservation Ecologist**	

I Riëtte van Zyl acting as the representative of Merlus Seafood Processors (Pty) Ltd, hereby confirm that we approve the Environmental Management Plan as presented in this document. All material information in the possession of the proponent that reasonably has or may have the potential of influencing the Environmental Management Plan was provided to the consultant.

Signed at WALVIS BAY on the 6th day of September 2021.

Merlus Seafood Processors (Pty) Ltd

CY/2002/0219

Registration Number

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1 OBJECTIVES OF THE EMP

Merlus Seafood Processors (Pty) Ltd operates a fish processing facility on erf 4662 in the industrial area of Walvis Bay. Normal operational activities include: 1) the receipt of bulk packed frozen fish and fresh fish from various suppliers; 2) the processing and packaging of the fish, which include sorting, filleting de-skinning and freezing of fresh fish; 3) quality control, storage and subsequent shipment of repackaged fish products to an international client; and 4) daily maintenance and administrative tasks. Maintenance include minor repairs to infrastructure and general upkeep of the facility.

In an effort to continuously improve on their environmental responsibility, and to renew their environmental clearance certificate (ECC), Merlus Seafood Processors requested Geo Pollution Technologies to prepare an updated environmental management plan (EMP) for their operations.

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. An EMP acts as a stand-alone document, which can be used during the various phases (planning, demolition, construction, operational and decommissioning) of any proposed activity or development. All contractors and sub-contractors taking part in any of these phases should be made aware of the contents of the EMP, so as to plan the relevant activities accordingly, and in an environmentally sound manner.

The updated EMP provides management options to ensure operational and maintenance impacts related to Merlus Seafood Processors' fish processing activities are continually minimised.

The objectives of the EMP are:

- To include all the components of the various activities performed by Merlus Seafood Processors.
- To prescribe the best practicable control methods to lessen the environmental impacts associated with these activities.
- To monitor and audit the performance of operational and maintenance personnel in applying such controls.
- To ensure that appropriate environmental training is provided to responsible operational and maintenance personnel.

Merlus Seafood Processors operates within ISO 14001 environmental management system (EMS). 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 includes 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; and
- Periodic (internal and external) audits and reviews of environmental performance and the effectiveness of the EMS.

2 THE EMP

The following general guidance for the EMP is based on the findings of the initial environmental impact assessment (EIA) and risk assessment carried out by Geo Pollution Technologies (Faul et al. 2018).

1.1 Land Use, Planning, Design, Operations – Identified Impacts

The following is the summary of the assessment of impacts:

- The facility operates within the industrial area of Walvis Bay;

- Impacts related to health and safety, noise, waste production and surface water contamination are the main concerns from an environmental perspective.
- The facility significantly contributes to employment, revenue generation and economic development.

1.2 Land Use, Planning, Design, Operations – Mitigating Measures

The following is a summary of the proposed management plan, which aims at preventing or minimizing potential negative impacts while enhancing the positive impacts associated with the facility:

- All health and safety regulations as determined by Namibian and other applicable legislation must be adhered to. This includes for example adhering to the World Health Organisation standards on noise exposure.
- All waste produced must recycled if possible or otherwise regularly disposed of at appropriate disposal facilities.
- Surface water contamination by effluent must be prevented by adhering to effluent disposal permit conditions.
- Value addition to fish products is promoted thereby maximising the economic benefits.
- A predominantly Namibian workforce is employed and they benefit from training and skills development.

3 THE IMPLEMENTATION OF THE EMP

Table 1 to Table 3 outline the management of the environmental elements that may be affected by the different activities, grouped in each phase of development. These groups are as follows:

- Planning Phase
- Operational Phase
- Decommissioning Phase

The EMP is a living document that must be prepared in detail, and regularly updated, by the proponent as the project progress and evolve. The tables below act as a guideline for the EMP to be established by Merlus Seafood Processors (Pty) Ltd. Impacts addressed and mitigation measures proposed are seen as minimum requirements which have to be elaborated on. Delegation of mitigation and reporting activities should be determined by the proponent and included in the EMP.

The EIA, EMP and ECC must be communicated to all relevant personnel. All monitoring results must be reported on as indicated. These are important for any future renewals of the ECC and must be submitted to the Ministry of Environment, Forestry and Tourism.

Table 1. Planning for Operations and Future Decommissioning of the Project

Activity	Objective	Action	Timing	Proof of Compliance	Responsible Body
Compliance	To comply with all legal requirements for the operations of the proposed development in Namibia.	Apply for / renew the necessary permits from the various ministries, local authorities and any other bodies that governs the operations of the proposed activity. Have ECC available on site. Finalise negotiations and resolve any outstanding issues, if any, over the allocation of user rights and zoning of the property on which the activity is located.	Ongoing	All contracts, permits, certificates and other legal documents on file.	Proponent
Appointments	To appoint reputable contractors and operational personnel and establish the EMP, a legal requirement that forms part of the contract with the contractor and employees.	Appoint contractors and employees and enter into an agreement which includes the EMP. Ensure that the contents of the EMP are understood by the contractor, sub-contractors, employees and all personnel who will be present on site.	Ongoing	Contracts on file	Proponent
Management	Establish a management system to implement and monitor Health, Safety and Environment.	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. Allocate the responsibility of liaison officer to a dedicated staff member who will be responsible for dealing with complaints and communication with neighbours and other potentially impacted parties (when required). Have emergency plans, equipment and personnel in place to deal with all emergencies (e.g. risk management plan, environmental management plan, emergency response plan and HSE manuals	Ongoing	Documentation on file Personal Protective Equipment (PPE) on site Signage related to restricted areas, dangerous areas, and PPE requirements on site Emergency response material and equipment on site with records of when such material or equipment were serviced or replaced (e.g. fire extinguishers)	Proponent

Activity	Objective	Action	Timing	Proof of Compliance	Responsible Body
		Ensure adequate protection and indemnity insurance cover for incidents is available. Comply with the provisions of all relevant safety standards and the EMS.			
Restoration Fund/Insurance	To establish a fund/insurance for future environmental restoration or pollution remediation if ever required.	To establish a fund for future ecological restoration of the project site should project activities cease and the site is decommissioned and/or when environmental restoration or pollution remediation is required.	Ongoing	Financial statements/proof of restoration fund/insurance	Proponent; Independent Specialist Consultant
Reporting	To establish a reporting system to report on monitoring aspects of operations, maintenance and decommissioning as outlined in the EMP	Establish a reporting system to report on aspects of operations and possible decommissioning as outlined in the EMP. Submit bi-annual monitoring reports to the MEFT as per the conditions of the ECC.	Ongoing (every six months)	Bi-annual monitoring reports	Proponent
Environmental Clearance Renewal	To renew the ECC every three years	Appoint a specialist environmental consultant to update the EIA and EMP and apply for renewal of the ECC.	Prior to expiry of the ECC	Renewed ECC	Proponent; Independent Specialist Consultant

Table 2. The Operational Phase

Criteria	Nature	Mitigation	Monitoring	Responsible Body
Skills, Technology & Development	Training will be provided to employees in order to perform various functions for successful implementation and execution of the project. Skills will be transferred to an unskilled workforce for general tasks. New technologies are often investigated and introduced into the industry. Development of people and technology are key to economic development.	If the skills exist locally, contractors must first be sourced from the area, then the region and then nationally. Deviations from this practice must be justified. Training and skills development must be focussed on Namibians. Skills development and improvement programs to be made available as identified during performance assessments. Employees to be informed about parameters and requirements for references upon employment.	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 report based on records kept.	Proponent
Demographic Profile and Community Health	The project relies on labour. It is not foreseen that the project will create a change in the demographic profile of the local community, as employment will be sourced locally as far as possible. The community may still to some extent be exposed to factors such as communicable disease (e.g. HIV/AIDS) and alcoholism/drug abuse. This impacts on overall community health. Should an increase in foreign people (e.g. migrant workers) in the area take place, this may potentially increase the risk of criminal and socially / culturally deviant behaviour.	Employ only local people from the area, deviations from this practice should be justified appropriately. Adhere to all municipal by-laws relating to environmental health, such as sanitation requirements. Educational programmes for employees on HIV/AIDs and general upliftment of employees' social status. Appointment of reputable contractors.	Bi-annual summary report based on employee demographics, educational programmes and training conducted.	Proponent
Revenue Generation and Employment	Employment are sourced locally while skilled labour/contractors may be sourced from other regions. An increase in semi-skilled, skilled and professional labour result from the operations. Increased economic resilience realise for employees residing in the area. True value addition is achieved through	The Proponent must employ local Namibians where possible. Deviations from this must be justified. If the skills exist locally, employees must first be sourced from the town, then the region and then nationally.	Bi-annual summary report based on employee records.	Proponent

Criteria	Nature	Mitigation	Monitoring	Responsible Body
	the processing of a local resource and its sale contribute to the economy and trade balance of Namibia.			
Traffic	Traffic impacts during periods of delivery and collection of fish, packaging material, waste, etc.	If any traffic impacts are expected, traffic management should be performed to prevent / mitigate these. The placement of signs to warn and direct traffic will mitigate traffic impacts. Trucks should not be allowed to park outside designated areas outside the property, for extended periods of time, neither should they obstruct neighbouring businesses.	Any complaints received regarding traffic issues should be recorded. A bi-annual report should be compiled of all incidents reported, complaints received, and measures taken to prevent future occurrences.	Proponent
Health, Safety & Security	Work related injuries and exposure to harmful chemicals, extreme cold temperatures, and radiation from operating x-ray machines.	It is imperative that adequate measures remain in place to ensure safety of staff on site at all times. All health and safety standards specified in the Labour Act should be complied with. An integrated health and safety management system acts as a monitoring tool and mitigating tool. Typical mitigating measures within the health and safety management systems are:- ♦ Operational and procedural manuals ♦ Health and safety training ♦ Housekeeping rules ♦ Colour coding areas, pipes, equipment and substances ♦ Signage for personal protective equipment (e.g. protective clothing like safety boots and hard hats) ♦ Safe work procedures and permits to work ♦ Emergency response plans ♦ Material safety data sheets (MSDS) ♦ First aid treatment and training ♦ Medical procedures and emergency services ♦ Regular safety moments and/or drills ♦ Emergency contact details The MSDS give health related medical responses for	Inventory of health and safety related material and administrative documentation to be kept 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.	Proponent

Criteria	Nature	Mitigation	Monitoring	Responsible Body
		personnel assisting staff who are exposed to chemicals. Security procedures and proper security measures must be in place. Strict security at the entry points must be adhered to. Fitness for work certificates for security officers.		
Noise	Noise pollution will exist, among others, due to running of compressors for blast freezers and cold storage, operations of fish processing line machinery, and heavy vehicles accessing the site.	Refer and adhere to the World Health Organisation regulations pertaining to noise (Guidelines for Community Noise, 1999). The Walvis Bay Municipality does not have any guidelines with respect to noise levels, but the World Health Organization (WHO) guideline on maximum noise levels (Guidelines for Community Noise, 1999) to prevent hearing impairment is followed. This limits noise levels in industrial areas to an average of 70 dB over a 24 hour period with maximum noise levels not exceeding 110 dB during the period. Hearing protectors to be part of standard PPE requirements in designated areas.	Any complaints received regarding excessive noise should be recorded with notes on action taken. All complaints and additional data, if available, to be compiled in a bi-annual report.	Proponent
Fire Hazards	Some products kept on site are flammable and therefore a fire risk exists.	The following controls are typical measures for mitigating the threat of a fire outbreak:- ♦ Storage of chemicals according to Material Safety Data Sheet and SANS instructions ♦ Site inspection and maintenance ♦ Operational procedures and training ♦ Mechanical and electrical inspections ♦ Regularly serviced fire extinguishers ♦ Trained personnel ♦ Good housekeeping ♦ Reporting of leaks/spills ♦ Liaise with the local Fire Brigade to ensure that all fire requirements are met. ***Fire Fighting and Fire Prevention:*** All fire precautions and fire control at the site must be in accordance with relevant SANS regulations or better.	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.	Proponent

Criteria	Nature	Mitigation	Monitoring	Responsible Body
		Firefighting measures as per the Material Safety Data Sheets of the products should be adhered to. In addition to this, all personnel have to be sensitised about responsible fire protection measures and good housekeeping such as the removal of flammable materials including rubbish. Regular inspections should be carried out to check for these materials at the site. A holistic fire protection and prevention plan is needed. This plan must include an emergency response plan, firefighting plan and spill recovery plan. Experience has shown that the best chance to rapidly put out a major fire is in the first 5 minutes. It is important to recognise that a responsive fire prevention plan does not solely include the availability of firefighting equipment, but more importantly, it involves premeditated measures and activities to timeously prevent, curb and avoid conditions that may result in fires. An integrated fire prevention plan should be drafted.		
Waste Production	Waste will include packaging material, fish by-products, waste water, typical office related and domestic waste, etc. Limited hazardous waste is produced e.g. microbial culture plates, used transformer oils, etc.	Waste should be disposed of regularly and at appropriately classified disposal facilities. Products that can be re-cycled should be kept separate and sent for recycling. 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. Microbial culture plates from the laboratory must be incinerated. Waste water and sewage must be disposed of according to their relevant permit requirements. All fish offal that can be used to make fishmeal should be collected and supplied to a local fishmeal producer.	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 data to be compiled in a bi-annual report.	Proponent
Surface Water	Surface water contamination can occur	Regular inspection and maintenance of the effluent sump	Any complaints received	Proponent

Criteria	Nature	Mitigation	Monitoring	Responsible Body
Contamination	when pollutants including high organic loads enter the ocean. Insufficient removal of fish waste products from the effluent water sump will increase the organic load of waste water disposed of into the ocean. This increases the chemical oxygen demand (COD) and biological oxygen demand (BOD) of the waste water. Contaminated water or oxygen poor water may negatively impact on aquatic ecosystems.	and screens. Contaminated water must be prevented from entering the effluent sump and treated as hazardous waste that must be disposed of at an appropriately classified facility. Emergency Response Plans and Spill Contingency Plans must be in place and include all chemicals being handled. Use of reputable and well trained contractors are essential. All chemicals must be handled according to their respective material safety data sheet instructions. Analysis of effluent discharged to the ocean to be conducted as per the effluent disposal permit.	regarding surface water contamination should be recorded with notes on action taken. Effluent analysis results on file. A bi-annual report should be compiled of any complaints received and effluent analysis results. Remedial action taken must be included in the report.	
Impact of lighting on birds	Excessive lighting used at night and especially those that are directed upwards blinds birds like flamingos that fly at night. This may result in disorientation of birds and collisions with structures.	Use minimum lighting at night and where lighting is necessary, ensure that it is directed downwards.	Any instances of bird strikes must be recorded and reported on a bi-annual basis.	Proponent
Visual Impact	This is an impact that affects the aesthetic appearance.	Regular waste disposal and routine maintenance on infrastructure will ensure that the longevity of structures is maximised and a low visual impact is maintained. However, it is important that the real integrity of the structures is considered in the long term and not just appearances.	A bi-annual report should be compiled of all complaints reported.	Proponent
Cumulative Impact	These are impacts on the environment, which result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of who undertakes such other actions. Cumulative impacts can result from individually minor, but collectively significant actions taking place over a period of time. In relation to an activity, it means the impact of an activity that in	Addressing each of the individual impacts as discussed and recommended in the EMP would reduce the cumulative impact. Reviewing biannual 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.	Bi-annual reports as stipulated for all other impacts must be reviewed to give an overall assessment of the impact of the Operational Phase.	Proponent

Criteria	Nature	Mitigation	Monitoring	Responsible Body
	itself may not be significant, may become significant when added to the existing and potential impacts resulting from similar or diverse activities or undertakings in the area. Possible cumulative impacts associated with the operational phase include increased risk of surface water contamination as a result of a number of different industries situated in the Port of Walvis Bay. Increased traffic in the area have a cumulative impact on traffic flow in the industrial area. Cumulative impact of lighting used at night increases the likelihood of bird strikes.			

Table 3. Decommissioning Phase

Criteria	Nature	Mitigation	Monitoring	Responsible Body
Employment	Decommissioning of the facility may lead to retrenchments or re-location of staff no longer required.	Plan in advance for meeting the Labour Acts requirements for retrenching of staff if required. Where possible staff can be relocated to another facility or town where business continues in the same way.	During normal operations of the facility an annual report must be compiled that includes the appropriate plans for handling of employees should the facility be decommissioned. The report should include budgeting for retrenchments and possible alternative positions elsewhere.	Proponent
Waste Production	Upon decommissioning waste will be produced in the form of building rubble, obsolete equipment and structures, obsolete or residual products and equipment or structures that can be used elsewhere or sold as scrap.	To reduce the amount of waste all re-usable equipment must be removed to another site owned by the proponent or sold. Those items that cannot be used again must be scrapped in the appropriate manner. Upon demolition of the buildings and concrete the rubble must be removed from the property and taken to an approved dumpsite. Rehabilitation if necessary are to be done using funds designated for the purpose.	Regular visual inspection. A register of hazardous waste produced and disposal methods should be maintained.	Proponent; Contractor
Ecological Impact	Operations spanning many years may create new habitat for fauna and flora. Upon decommissioning these habitats will be destroyed.	The proponent would have to ensure that no new habitat is created for flora and fauna. Before decommissioning inspect every structural facility to ensure that the dismantling and removal of any structure would not affect any organism that has become dependent on those structures for survival, shelter or breeding. Where new habitats were created, that is now occupied by fauna or flora, the proponent must contact MEFT or other appropriate organizations to establish the conservation status of it. The possibility of relocating the fauna or flora must be investigated and executed. Should the species be listed as vulnerable to extinction, or worse, a meeting should be held	A report should be compiled of any fauna and flora that established itself on the premises. The report should include all actions taken to relocate or deal with the situation.	Proponent; Contractor

		with MEFT in order to determine the appropriate handling of the situation.		
Dust	Dust will be generated during the decommissioning phase and might be aggravated during periods of strong winds.	It is recommended that regular dust suppression be included in the decommissioning phase, when dust becomes an issue. Personnel should be issued with dust masks for health and safety reasons.	Regular visual inspection. A complaints register must be maintained, in which any complaints from the community must be logged. Complaints must be investigated and, if appropriate, acted upon.	Proponent; Contractor
Noise	Noise pollution will exist due to heavy vehicles accessing the site to collect rubble from demolished building materials. Cranes may be erected for removing some structures. Hammers, diggers and drills may be used.	Refer and adhere to the World Health Organisation regulations pertaining to noise (Guidelines for Community Noise, 1999). All personnel must be issued with hearing protectors and neighbours must be notified of the time and duration of decommissioning. Notice of the start of the decommissioning should be given to the local authorities with an invitation to give feedback at any time with regards the noise impact.	A complaints register must be maintained, in which any complaints from the community must be logged. Complaints must be investigated and, if appropriate, acted upon.	Proponent; Contractor.
Visual Impact	This is an impact that affects the aesthetic appearance	Visual impact could pose one of the most significant impacts. Visual impacts could be limited through keeping all decommissioned areas clean and orderly at all times. Good housekeeping also reduces the risk of injuries. Notice of the start of the decommissioning should be given to the local authorities with an invitation to give feedback at any time with regards the visual impact.	A complaints register must be maintained, in which any complaints from the community must be logged. Complaints must be investigated and, if appropriate, acted upon.	Proponent; Contractor
Groundwater, Surface Water and Soil Contamination	Porous surface substrate can allow unwanted hazardous and ecologically detrimental substances to seep down to the water table.	All precautions are to be taken to prevent contamination of the soil as this could enter the ecosystem. Leakages from vehicles might occur especially if they are serviced on site. Care must be taken to avoid contamination of soil and groundwater. Groundwater might spread pollutants to neighbouring receptors and may create an impact on underground utilities (i.e. fresh water supply to buildings, sewerage system). Pollutants in the soil and building rubble must be transported away from the site to an approved, appropriately classified waste disposal site.	Report form for all spills or leaks is to be completed by Contractor.	Proponent; Contractor

		Confirm MSDS information for any chemicals that must be discarded. Regulations on sewerage discharge and the chemicals that may and may not be put into the sewerage system must be followed.		
Health, Safety and Security	During the decommissioning phase similar risks to human beings as with previous phases will be present. All risks associated with demolitions must be considered.	Adequate measures must be brought in place to ensure safety of staff on site, and includes: ♦ Proper training of operators; ♦ First aid treatment; ♦ Medical assistance; ♦ Emergency treatment; ♦ Protective clothing, footwear, gloves and belts; safety goggles and shields; ♦ Manuals and training regarding the correct handling of materials and packages should be in place and updated; ♦ 24-hour security surveillance in case of opportunistic activities.	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 itself.	Proponent; Contractor
Fire Hazard	Accumulation of waste and incorrect handling of chemicals may lead to fires.	All relevant regulations, precautions and equipment should be in place as they were during the Operational Phase. All personnel have to be sensitised about responsible fire protection measures and good housekeeping such as the removal of flammable materials. Regular inspections should still be carried out to inspect and test fir fighting equipment. All fire precautions and fire control must be in accordance with SANS, or better. The holistic fire protection and prevention plan should still be utilised. Experience has shown that the best chance to rapidly put out a major fire is in the first 5 minutes. It is important to recognise that a responsive fire prevention plan does not solely include the availability of firefighting equipment, but more importantly, it involves premeditated measures and activities to timeously prevent, curb and avoid conditions that may result in fires.	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 itself.	Proponent; Contractor

4 CONCLUSIONS

The above updated EMP, if properly implemented will help continually minimise adverse impacts on the environment. Where impacts occur, immediate action must be taken to reduce the escalation of effects associated with these impacts. To ensure the relevance of this document to the specific stage of project, it needs to be regularly reviewed and updated throughout all phases.

The updated EMP should continue be used as an on-site reference document during all phases of the proposed project, and auditing should take place in order to determine compliance with the EMP for the proposed site, and Parties responsible for transgression of the EMP should be held responsible for any rehabilitation that may need to be undertaken.

Monitoring reports must be submitted to the Ministry of Environment, Forestry and Tourism on a bi-annual basis to allow for the future renewal of the ECC. This is a requirements by the Ministry of Environment, Forestry and Tourism.

5 REFERENCES

Faul A, Botha P, Coetzer W. 2018. Environmental Impact Scoping Assessment for the Operations of Merlus Seafood Processors in the Fishing Harbour of Walvis Bay.