

**Updated Environmental Management Plan (EMP) for the:  
Operations and Maintenance of a Retail Fuel Service Station and Associated  
Infrastructure at Ondalae YaElim Growth Point in Ekanda Village, Omusati Region**




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Title: Updated Environmental Management Plan (EMP) - Operations and Maintenance of a Retail Fuel Service Station and Associated Infrastructure at Ondalae YaElim Growth Point in Ekanda Village, Omusati Region

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**LIST OF ABBREVIATIONS**

ABBREVIATION	MEANING
DEAF	Department of Environmental Affairs and Forestry
EAP	Environmental Assessment Practitioner
ECC	Environmental Clearance Certificate
ECO/SHE Officer	Environmental Control Officer / Safety Health & Environment Officer
EIA	Environmental Impact Assessment
EMA	Environmental Management Act
EMP	Environmental Management Plan
HSE	Health, Safety and Environment
MEFT	Ministry of Environment, Forestry and Tourism
MME	Ministry of Mines and Energy
NORED	Northern Namibia's Regional Electricity Distributor
PPE	Personal Protection Equipment
RA	Roads Authority of Namibia

# 1 INTRODUCTION

## 1.1 Background and Project Location

Namfocus Investment CC operates and maintain a retail fuel service station and associated infrastructures (*the project*) at Ondalaye yaElim Growth Point in Ekanda Village of the Omusati Region. The fuel station is located about 22km west of Oshakati Town, between the Oshakati-Okahao C41 main road junction and the newly constructed D3615 road from Ondalae yaElim to Oshikuku as shown on the locality map in Figure 1-1. The site entails a convenience store, a fuel canopy with four (4) dispersive pumps, and two (2) fuel storage tanks (petrol and diesel). There are also plans for a small car wash that has not been established yet. The tanks each has a capacity of 23,000 litres (totalling to 46,000 litres) and installed in a sealed tank farm adjacent to the canopy. The footprint of the site is approximately 3,000m<sup>2</sup> (0.3Hectares (Ha)), inclusive of access from the C41.



**Figure 1-1: Locality map of the Namfocus Investment Retail Fuel Station site at Ondalae yaElim Growth Point in the Omusati Region**

The land on which the project is has been rightfully allocated (leased) to Namfocus Investment by the Uukwambi Traditional Authority on the 02<sup>nd</sup> of February 2022 as per the documents submitted alongside the EIA documents between 2018 and 2020 when the EMP was submitted for the issuance of the ECC.

The GPS coordinates of the project site are as follows:

- Point 1: 17°47'16.79"S 15°28'36.45"E
- Point 2: 17°47'16.89"S 15°28'38.12"E
- Point 3: 17°47'18.58"S 15°28'36.43"E
- Point 4: 17°47'18.55"S 15°28'38.23"E

The project and associated activities are listed in the Environmental Impact Assessment (EIA) Regulations (2012) of the Environmental Management Act (EMA) No. 7 of 2007 that may not be undertaken without an Environmental Clearance Certificate (ECC) and that the ECC needs to be renewed every three years:

The associated listed activities in the EIA Regulations include:

Listed Activity 9. Hazardous Substance Treatment, Handling and Storage

- Listed Activity 9.1: The manufacturing, storage, handling or processing of a hazardous substance defined in the Hazardous Substances Ordinance, 1974.
- Listed Activity 9.4 The storage and handling of dangerous goods, including petrol, diesel liquid petroleum gas or paraffin, in containers with a combined capacity of more than 30 cubic meters at any one location" - the storage of fuel in the two tanks with a combined capacity of 46 cubic meters (two 23m<sup>3</sup> or 23,000 litre fuel tanks).
- Listed Activity 9.5 Construction of filling stations or any other facility for the underground and above ground storage of dangerous goods, including petrol, diesel, liquid, petroleum, gas or paraffin".

To fulfil this requirement, the site was issued an ECC on the 30<sup>th</sup> of July 2020 upon approval of a Scoping Report and Environmental Management Plan (EMP) initially developed in 2016 by OMAVI Geotechnical & Geo-Environmental Services Consultants and updated in 2020. The ECC expired on the 30<sup>th</sup> of July 2023, and has not been renewed yet. Hence, the need to. The copy of the expired ECC is attached hereto as Appendix A.

Therefore, for the project to remain compliant to the environmental legislation and ensure sustainability, the ECC renewal should be applied for (accompanied by an updated Environmental Management Plan (EMP) and submitted to the Environmental Commissioner at the Ministry of Environment, Forestry and Tourism (MEFT)).

To ensure a continued compliance with the EMA and its 2012 EIA, Namfocus Investment CC appointed Serja Hydrogeo-Environmental Consultants CC, independent Environmental Consultants to apply for the ECC renewal, accompanied by an updated EMP.

The updated EMP would include information of what may have changed between the date of ECC issuance to date as well as the confirmation of actual implementation of the environmental management and mitigation measures recommended upon approval of the first EMP. The updated EMP is then submitted to the Environmental Commissioner at MEFT for ECC renewal consideration.

## **1.2 The Aim of this EMP**

This document has been compiled to inform the Ministry of Environment, Forestry and Tourism (MEFT) of what has happened on the project site since the issuance of the expired ECC to date to enable the renewal of the ECC issued in July 2020. The aim is also to report on the progress of actual work done on site, implementation of the environmental management and mitigation measures of potential impacts identified.

For the project to remain compliant with the environmental legislation and ensure sustainability, a new ECC should be applied for by launching an application with MEFT for evaluation and consideration of renewing the ECC.

The ECC renewal is aimed at ensuring that the project activities are undertaken in an environmentally friendly and sustainable manner. This is done by ensuring effective implementations of environmental management and mitigation measures recommended in the previously approved EMP to minimize the adverse identified impacts while maximizing the positive impacts. Not only by the mere implementation of these measures, but also bi-annual monitoring of this implementation through audit and project activities' compliance exercises on site throughout the project life cycle and validity of the ECC over time.

Subsequently, to comply with the EMA and its 2012 EIA Regulations, the Proponent appointed an independent Environmental Consultant to undertake the necessary tasks for their ECC renewal. The required tasks include assessing of the site, checklist the status of the implementation of the old EMP/management and mitigations, compiling an updated Environmental Management Plan (EMP) and submitting the ECC renewal application and EMP to the competent and regulatory authority, respectively.

The short description of the current operational site activities is presented under the next chapter.

## 2 DESCRIPTION OF CURRENT ACTIVITIES ONSITE: SITE AUDIT

The project is localised, and therefore considered a small to medium scale activity. Although, the ECC was issued in 2020, the site operations only commenced in September 2023 due to financial constraints, thus, the project never kicked off as initially planned. The construction activities commenced in May 2018 and were only completed in August 2023. The main activities are summarised as follows:

- The installed services infrastructure (water, power and sewer), foundations and paved site access road.
- Movement of vehicles to and from the service station to fuel up or delivery of operational services and goods.
- The operation and maintenance of fuel pumps island and related accessories as well as the fuel tank farm and related supporting technologies.
- High density Polyethylene (HDPE) fuel delivery pipes connect the dispensing pumps to the tanks.
- Operation of stormwater, kerb line, pavement and containment slab at the fuel station facility.
- The operation of the 24-hour convenience shop/store, small office, and parking bays.

### 2.1 Operational Activities and Maintenance

The site activities are centred on the dispensing of fuel from the two 46,000-litre tanks to refill vehicles from the area and these travelling on the C41 and D3615.

The fuel is dispensed at the site pumps island from the two buried fuel tanks (petrol and diesel) as shown in Figure 2-1 and Figure 2-2 below. The activities also entails the operation of the Convenience Shop (Figure 2-3) whereby several basic items are sold to customers who mainly refill their vehicles at the Service Station.



Figure 2-1: The canopy and fuel pumps island onsite





**Figure 2-2: The buried petrol and diesel tanks onsite**



**Figure 2-3: The view of the site building containing the Convenience Shop, administration (office) and ablution facilities**

Following the Audit done for the site on the 29<sup>th</sup> of March 2024, the findings and observations of the site (in terms of compliance, services, resources and infrastructures) have been noted down and included in this updated EMP as presented below.

## **2.2 Site Findings and Observations of the Project Activities**

The site was audited based on the project activities and done in terms of the actual resources (human and technical as well as services infrastructure) onsite and they are as follows:

- Human resources: The project employs five people, i.e., two fuel attendants, two Convenience Shop attendants and one security guard.
- Accommodation for the workers: The workers are from the nearby villages (community), therefore, commute from their homes to site. In other words, no need for accommodation onsite.

- Water supply: water for the project is supplied via a water connection line from the Ekanda Village rural water supply (Figure 2-4). There are no water storage tanks onsite yet, but there is a water tank stand installed onsite.



**Figure 2-4: The water tap onsite**

- Stormwater management: The site has proper diversion system and interlocked system to ensure that rainwater is washed down the intended paths of the site into the open *oshanas* (open water systems) near the site.
- Power supply: The Site is connected to the NORED electricity grid for power supply as seen in Figure 2-5.



**Figure 2-5: The NORED power lines near the site**

- Waste Management: the site waste management was audited for the following waste types:
  - Solid waste (domestic and general): There site generally clean and solid waste is kept in waste bins and skips onsite - Figure 2-6. Since the waste is minimal, waste bins are emptied by the Proponent on a weekly basis and transported to a small site dumpsite about 200m away from the service station.



**Figure 2-6: Some of the solid waste collection bins onsite**

- Hazardous waste: since the site is centered on fuel storage and handling (refueling), there is a potential of some waste from oil spills during operations, thus, there is an oil-water separator (Figure 2-7) to collect waste oil spills, especially during rainy season when there is high surface water runoff in the area. Since the project operations are new, the separators will be cleaned by an appointed contractor when needed. There are also oil drip trays onsite to ensure that spills are prevented.



**Figure 2-7: Oil-water separator structures onsite**

- Sewage: The site is provided with two flushing toilets (Figure 2-8) that are connected to a sewer system. No other effluent is generated onsite.



**Figure 2-8: One of the two flushing toilets at the Namfocus Service Station**

- Occupation health and safety:



- First aid kit: There is one fully-furnished first aid kit onsite as shown in Figure 2-9. On the question whether there is a trained workers onsite to administer first aid, the Proponent representative onsite during site visit responded that one of the offsite management personnel did receive first aid administering training but none of the employees onsite. Therefore, they will get one or two of the site personnel (workers) trained on this.



**Figure 2-9: The site first aid kit onsite**

- Fire extinguishers: There are four fire extinguishers onsite that are well-serviced and up-to-date (last service done in August 2023 and next service date is August 2024). One of the fire extinguishers is shown in Figure 2-10 below. According to the Proponent representative, there is no personnel with basic firefighting skills onsite yet.



**Figure 2-10: One of the four fire extinguishers onsite**

- Warning and Hazard signage: there are sufficient warning or cautionary signage onsite as shown in Figure 2-11 below. This is crucial to have such clear and visible signs because the site operations are mainly on handling flammable products (fuel).



**Figure 2-11: Some of the warning and prohibition signs at the fuel pump island onsite**

- Personal Protective Equipment (PPE): The site personnel are equipped with appropriate personal protective equipment (PPE) while performing tasks on site. Some workers with PPE are shown in Figure 2-12.



**Figure 2-12: Two site workers with their PPE**

There is an assembly point onsite in case of emergencies which is clearly marked as such – Figure 2-13.



**Figure 2-13: The assembly point onsite**

- Health and Safety Inductions and Trainings: the Proponent representative indicated that the personnel have received some training but not detailed training. Therefore, this needs to be considered as soon as possible as part of safety meetings to be done as constant reminders.
- Site accessibility (Road): The site is accessed from the Oshakati-Okahao C41 main road junction through a small access road to the site. There is no permit from Roads Authority for this access yet.

### 3 LEGAL FRAMEWORK: OPERATIONAL PERMITTING AND LICENSES

The project’s activities are undertaken in a biophysical and social environment. These activities or some of them may even at minimum impact some of these environmental components. It is therefore necessary to consider the legislations and legal requirements governing the project and its associated activities.

The main legal framework presented herein is that of Namibia for the relevant project component under the scope of this document and this is regarding the authorizations and permitting for project activities as presented in Table 3-1.

**Table 3-1: List of applicable legislation where required, permits or licenses for the project activities**

Legislation/Policy/ Guideline	Relevant Provisions	Implications for this project
Environmental Management Act EMA (No 7 of 2007)	Requires that projects with significant environmental impacts are subject to an environmental assessment process (Section 27).	The EMA and its regulations should inform and guide this EA process.
Environmental Impact Assessment (EIA) Regulations GN 28-30 (GG 4878)  <b>Regulated under the Ministry of Environment, Forestry and Tourism</b>	The details principles which are to guide all EAs.	<b>ECC Renewal:</b> An ECC should be renewed every 3 years prior to its expiry date (at least one month before expiry date). The contact details at the Department of Environmental Affairs and Forestry (DEAF) are as follows:  Mr. Timoteus Mufeti: Environmental Commissioner  Tel.: 061 284 2701
	Details requirements for public consultation within a given environmental assessment process (GN No 30 S21).  The details the requirements for what should be included in an Environmental Scoping Report (GN No 30 S8) and an EIA report (GN No 30 S15) were already incorporated in the initial reports submitted for the expired ECC in 2015.	The project is already in its operational phase. However, if necessary and required, constant consultations and engagements with the interested and affected parties (stakeholders) should be continued. In case of grievances raised by the neighbouring land users to the Proponent, this should be addressed and resolved amicably.



Legislation/Policy/ Guideline	Relevant Provisions	Implications for this project
<p>Soil Conservation Act (No 76 of 1969)</p> <p><b>Regulated under the Ministry of Agriculture, Water and Land Reform</b></p>	<p>The Act makes provision for the prevention and control of soil erosion and the protection, improvement and conservation of soil, vegetation and water supply sources and resources, through directives declared by the Minister.</p>	<p>Duty of care must be applied to soil conservation and management measures must be included in the EMP. This is mainly aimed at soil disturbance through unnecessary creation of new tracks and pollution from project related activities.</p>
<p>Petroleum Products and Energy Act (No. 13 of 1990) Regulations (2001)</p> <p><b>Regulated under the Ministry of Mine and Energy (MME)</b></p>	<p>Regulation 3(2)(b) states that “No person shall possess or store any fuel except under authority of a licence or a certificate, excluding a person who possesses or stores such fuel in a quantity of 600 litres or less in any container kept at a place outside a local authority area”</p>	<p>There are two fuel storage tanks (combined volume of 92,000 litres) kept on site. Therefore, the Proponent should ensure that the Permit to store fuel in that volume is obtained from the Petroleum Affairs at the MME. Care must be exercised when handling hydrocarbon products onsite.</p> <p>Mr. Carlo Mcleod: Acting Director of Petroleum Affairs &amp; Deputy Director: Compliance, Regulations and Economics Tel: +264 (0) 61 284 8291</p>
<p>Pollution Control and Waste Management Bill</p> <p><b>Regulated under the Ministry of Environment, Forestry and Tourism</b></p>	<p>The bill aims to “prevent and regulate the discharge of pollutants to the air, water and land” Of particular reference to the Project is: Section 21 “(1) Subject to sub-section (4) and section 22, no person shall cause or permit the discharge of pollutants or waste into any water or watercourse.”</p> <p>Section 55 “(1) No person may produce, collect, transport, sort, recover, treat, store, dispose of or otherwise manage waste in a manner that results in or creates a significant risk of harm to human health or the environment.”</p>	<p>The Proponent and their workers should continue with the good waste management work (directly or indirectly) to ensure that the waste does not cause environmental threat and risk.</p> <p><b>No permit or license required.</b></p>
<p>Public Health Act (No. 36 of 1919)</p>	<p>Section 119 states that “no person shall cause a nuisance or shall suffer to exist on any land or premises owned or occupied by him or of which he is in charge any nuisance or other condition liable to be injurious or dangerous to health.”</p>	<p>The Proponent and all its employees should ensure compliance with the provisions of these legal instruments.</p> <p><b>No permit or license required.</b></p>

Legislation/Policy/ Guideline	Relevant Provisions	Implications for this project
Health and Safety Regulations GN 156/1997 (GG 1617)	Details various requirements regarding health and safety of labourers.	
Public and Environmental Health Act No. 1 of 2015  <b>Regulated under the Ministry of Health and Social Services</b>	To provide a framework for a structured uniform public and environmental health system in Namibia; and to provide for incidental matters.	
Road Traffic and Transport Act, No. 22 of 1999  <b>Regulated under the Ministry of Works and Transport</b>	The Act provides for the establishment of the Transportation Commission of Namibia; for the control of traffic on public roads, the licensing of drivers, the registration and licensing of vehicles, the control and regulation of road transport across Namibia's borders; and for matters incidental thereto.	Mitigation measures should be provided for if the roads and traffic impact cannot be avoided. The relevant access road permits must therefore be applied for.  The Proponent should apply for a formal access road permit from the nearest Roads Authority: Ministry of Works and Transport. Or Contact Head Office: Mr. Eugene de Paauw
Labour Act (No. 6 of 1992)  <b>Regulated under the Ministry of Labour, Industrial Relations and Employment Creation</b>	Ministry of Labour, Industrial Relations and Employment Creation is aimed at ensuring harmonious labour relations through promoting social justice, occupational health and safety and enhanced labour market services for the benefit of all Namibians. This ministry ensures effective implementation of the Labour Act No. 6 of 1992, specifically its Regulations, No. 156 Labour Act, 1992: Regulations relating to the health and safety of employees at work	The Proponent should ensure that the site operations, and maintenance works, do not compromise the safety and welfare of workers.  <b>No permit or license required.</b>

## 4 ENVIRONMENTAL MANAGEMENT ACTION PLANS CHECKLIST

This chapter presents the potential impacts that were identified at the time the environmental clearance was issued, the environmental management actions (measures) recommended and the implementation checklist (status of EMP implementation). It is under this chapter that the Environmental Consultant indicates whether Namfocus Investment has been maintaining the implementation of management and mitigation actions plans on site to manage and mitigate the significance of the adverse potential impacts stemming from the current project phase and associated activities.

### 4.1 Key Potential Impacts

The main potential impacts identified are as follows:

#### Positive

- Socio-economic development through employment and revenue generation
- Fuel supply convenience and provision or availability of sufficient fuel supply in the area
- Local empowerment through creation of opportunities for previously disadvantaged citizens to participate in the fuel retail space
- Increased private sector investment in the form of local development, service delivery and empowerment/ improved buying power of previously disadvantaged personnel
- Increase in value of adjacent immovable property

#### Negative (Adverse)

- Ongoing solid waste generation,
- Liquid Waste generation
- Occupational health and safety, concerns for staff and customers and neighbouring communities
- Fire hazards (accidental fire outbreaks)
- Product spillages and runoff with potential for surface and groundwater pollution
- General impacts from general operation of service station
- Possible spillages by attendants leading to safety hazards, and/or leakages from underground storage tanks leading to soil contamination
- Possible soil erosion and flooding on adjacent areas due to compaction over footprint of service station
- Traffic (vehicular) safety.

### 4.2 EMP Implementation Roles and Responsibilities

This section is presentation of the roles of different parties involved in the project cycle (for its current phase (operations and maintenance)) and their respective responsibilities towards the implementation of the EMP.

This EMP informs all relevant parties listed below and everyone employed at the site as to their duties in the fulfilment of the legal requirements for the operation of the fuel service station. This is done to prevent and mitigate the potential negative environmental impacts. All parties should note that obligations imposed by the EMP are legally binding in terms of the Environmental Clearance granted by MEFT to:

- Ensure compliance with regulatory authority stipulations and guidelines which may be local, provincial, national, and/or international.
- Verify environmental performance through information on impacts as they occur.
- Provide feedback for continual improvement in environmental performance.
- Identify a range of mitigation measures which could reduce and mitigate the potential impacts to minimal or insignificant levels.
- Detail specific actions deemed necessary to assist in mitigating the environmental impact of the project.
- Create management structures that addresses the concerns and complaints that may be raised by interested and affected parties (I&APs) with regards to the project; and
- Establish a method of monitoring and auditing environmental management practices during the project.

The roles and responsibilities of all parties involved in the effective implementation of the EMP are set in Table 4-1.

**Table 4-1: The persons and institutions responsible for the Implementation of the EMP**

Responsible person or institution	Responsibility
Namfocus Investment (Proponent)	-Managing the implementation of the EMP and updating and maintaining it when necessary.  -Management and monitoring of individuals and/or equipment on-site in terms of compliance with the EMP.  -The implementation of and compliance with the environmental management measures proposed in this document.  -Ensuring compliance with relevant environmental and related authorisations and license conditions.
Site Manager	-Ensure that relevant commitments contained in the EMP Action Plans are adhered to.  -Ensure relevant staff is trained in procedures entailed in their duties.

Responsible person or institution	Responsibility
	<ul style="list-style-type: none"> <li>-Maintain records of all relevant environmental documentation for the project.</li> <li>-Reviewing the EMP annually and amending the document when necessary.</li> <li>-Issuing fines to individuals who may be in breach of the EMP provision and if necessary, removing such individuals from the site.</li> <li>-Cooperate with all relevant interested and affected parties/stakeholders.</li> <li>-Management and facilitation of communication between the Proponent and Interested and Affected Parties (I&amp;APs), where required.</li> <li>-Development and management of schedules for daily activities</li> </ul>
<p>Environmental Control Officer (ECO) or Safety, Health &amp; Environmental (SHE) Officer</p>	<ul style="list-style-type: none"> <li>-Make sure that the provisions of the EMP as well as the environmental authorization are complied with onsite. The ECO/SHE Officer must be fully conversant with the Environmental Impact Assessment, Environmental Management Plan/Programme and environmental legislations, specifically the Environmental Management Act No. 7 of 2007 and its 2012 EIA Regulations.</li> <li>-Issue instructions to the Proponent where environmental considerations call for action need to be taken.</li> <li>-Submit regular written reports, ensuring that activities on site comply with all relevant environmental legislation, monitoring and verifying that adverse environmental impacts are kept to a minimum.</li> <li>-Conducting monthly site inspections with reporting for the activities undertaken on all site areas with respect to the implementation of the EMP (monitor and audit the implementation of the EMP).</li> <li>-Advising the Proponent on the removal of person(s) and/or equipment not complying with the provisions of the EMP.</li> </ul>

Responsible person or institution	Responsibility
	-Making recommendations to the Proponent with respect to the issuing of fines for contraventions of the EMP.  -Undertaking an annual review of the EMP and recommending additions and/or changes to the document.  -Maintain records of all relevant environmental documentation.
Project workers and contractors	They have a personal responsibility to aid in the implementation of the EMP while present and working on site. Therefore, they will be required to adhere to the relevant management and mitigation measures to collectively protect the environment and promote environmental sustainability.

### 4.3 EMP Auditing Based on Observations and Required Actions

The evaluated and compliance status in Table 4-2 has been done to check EMP compliance (the implementation of the management and mitigation measures (action plans)) with regards of what has been happening on site between when the ECC was issued (July 2020), when it expired in July 2023 to when then site audit was done end of March 2024.

As mentioned above, has. Where further recommendations or action plan is required to improve environmental sustainability and ensure compliance with legal requirements, this is also indicated in Table 4-2.

### 4.4 EMP Requirements Compliance Status (Current Activities)

The environmental management measures (actions) have been checked for compliance with regards of what has been happening onsite since September 2023 when the actual site operations commenced. The management actions are categorized as per implementation by the Proponent as follows:

- **Fully Compliant** – the Proponent undertook or has been undertaking the project activity/ies according to the environmental management action recommended, therefore complies with the EMP requirements.
- **Compliant** - the Proponent undertook or has been undertaking project the activity/ies according to the recommended environmental management actions, but not fully. An action plan would be expected to change such status from "Compliance" to "Full Compliance".

- **Non-Compliant** – the Proponent did not undertake or has not been undertaking the project activity/ies (or some of the activities) as per the recommended environmental management actions in the EMP. The Proponent’s commitment for improvement is required in this case to achieve full compliance or progressive partial compliance in the next EMP implementation check.

Table 4-2: Operations and Maintenance - EMP Compliance between July 2020 and July 2023 as well as further mitigation measures (actions) where needed

Aspect	Activity	EMP Implementation and Observations	Compliance Status	Required Action Measures
<b>OPERATIONAL PHASE AND MAINTENANCE ASSOCIATED ACTIVITIES</b>				
EMP and training Implementation	EMP required permits such as Road Access Permit	-The site does not have a formal access road permit	NON-COMPLIANT	-The Road Access Permit should be applied for and obtained from Roads Authority (RA).
ECC	The validity of the ECC	-The ECC has recently expired but the application for renewal has been submitted to MEFT.	PARTIALLY COMPLIANT	-The next ECC renewal application should be applied for at least one month before expiry date and not after expiry date.
Reporting system on monitoring aspects of operations and maintenance as outlined in the EMP	Reporting	-Establish a reporting system to report on aspects of operation and maintenance. -Keep monitoring reports (bi-annual reporting) on file for submission with Environmental Clearance Certificate renewal applications where needed.	NON-COMPLIANT this has been explained by the Environmental Consultant onsite for improvement	-Environmental Monitoring/Audit Reports should be compiled (bi-annually or annually) depending on the conditions of the new ECC.
Labour and Recruitments	Appointments	-Contractors appointed and employees hired and enter into an agreement -Locals are employed for the operations and maintenance.	FULLY COMPLIANT	-None
Management system in Health, Safety and Environmental	Health, Safety & Environment Management systems and measures should be in place.	-There are safety and health warnings onsite. -The signs are clear and visible.	COMPLIANT	-None



Aspect	Activity	EMP Implementation and Observations	Compliance Status	Required Action Measures
Occupational health and safety	Health, safety and environment(HSE)	<ul style="list-style-type: none"> <li>-There is fully furnished first aid kit and two to three personnel will be trained on how to administer first aid.</li> <li>-There are some basic documents for HSE are on file but need to be improved.</li> <li>-There are sufficient Personal Protection Equipment (PPE) for workers ranging from overalls, safety boots, and others as necessary.</li> <li>-PPE is appropriately worn by site workers.</li> </ul>	COMPLIANT	<ul style="list-style-type: none"> <li>-Induction training for all who enter the site is required.</li> <li>-Make provisions to have an HSE Coordinator to implement the EMP and oversee occupational health and safety as well as general environmental related compliance at the site.</li> <li>-Regular safety meetings should be held to serve as constant reminders.</li> <li>-The sex health education awareness should be included in annual refresher trainings.</li> <li>-Have emergency plans, equipment, and personnel in place to deal with all emergencies.</li> <li>-Risk Management / Mitigation / Emergency Response Plan (ERP) and HSE Manuals.</li> <li>-Adequate protection and indemnity insurance cover for incidents.</li> <li>-Ensure that adequate emergency facilities are available on site and knowledge of administering is provided to some workers.</li> <li>-Equipment that must be locked away on site and must be placed in a way that does not encourage criminal activities.</li> <li>-Security personnel to remove anyone portraying disruptive behaviour on and around the site to ensure safe.</li> <li>-A register of all incidents must be maintained daily. This should include measures taken to ensure that such incidents do not re-occur.</li> </ul>

Aspect	Activity	EMP Implementation and Observations	Compliance Status	Required Action Measures
				<p>-The Proponent must avail adequate and appropriate PPE to all workers and where necessary, for visitors.</p> <p>-Timeously recording and reporting of all health and safety incidences.</p>
Enhanced skills and economic development promotion	<p>People need skills to perform their jobs. Development of people and technology are key to economic development</p>	<p>-The employed locals are employed for some skilled works and unskilled, thus, gaining skills in their respective jobs.</p>	FULLY COMPLIANT	<p>-Continue the employment of local residents and immediate areas around Ekanda Village for jobs that they are capable of.</p> <p>-Promote the procurement of goods and services opportunities by local businesses, and if not locally available, Omusati Region based businesses should be prioritized.</p>
Stormwater Management	<p>-The management of stormwater to prevent flooding</p>	<p>-There is a stormwater diversion system onsite.</p>	FULLY COMPLIANT	<p>-None</p>
Soils	<p>-Soil compaction, erosion and pollution</p>	<p>-No signs of soil compaction observed onsite because the site surface covered by interlocks.</p> <p>-Vehicles are making use of provided access roads to and within the site.</p> <p>-There are no signs of soil pollution onsite.</p>	COMPLIANT	<p>-Adjacent areas to the project site and unneeded areas within the site areas should not be disturbed.</p> <p>-The use of existing tracks such as access roads is essential to minimize the footprints on the soils over time. Therefore, project vehicles should only make use of such provided access roads.</p> <p>-Ensure that when areas outside the project site boundaries are disturbed by project related activities, rehabilitation should be conducted immediately once the activity has been completed.</p> <p>-Any future oils spills on the ground should be cleaned as soon as possible to ensure that it does not infiltrate further into the ground to pollute soils and groundwater.</p>

Aspect	Activity	EMP Implementation and Observations	Compliance Status	Required Action Measures
Water resources (specifically groundwater) and soil contamination	<p>Porous surface sediments in areas like northern Namibia can provide ready pathways for contaminants such as unwanted hazardous and ecologically detrimental substances to seep down to the water table either at the site of spill or after being washed away by surface flow during heavy rainy seasons.</p> <p>Accidental spills of fuel, and other chemicals that may be used on site might occur.</p>	<p>-The soils onsite do not have any spills from oils or fuels.</p> <p>-There are oil drip trays onsite and water-oil separators at the washing area at the site workshop to ensure that any oil spill on the interlocks is washed down the separator for proper disposal.</p> <p>-Sewage is well-handled through a closed system (sewer reticulation system) to ensure that it does not get on the soils and contaminate it.</p> <p>-The site has proper diversion system to ensure that rainwater is washed down the intended paths of the Town's stormwater management systems.</p>	FULLY COMPLIANT	<p>-All precautions are to be taken to prevent contamination of the soil as this could enter the ecosystem.</p> <p>-Proper training of project personnel would reduce the possibility of the impact occurring, especially with onsite soil contamination.</p> <p>-Any fuel spills must be reported, and remediation action taken.</p> <p>-Contaminated soil must be transported away from the site to an approved, appropriately classified waste disposal site. Contaminated soil should be remediated.</p>
Water resources use	-Water required for project activities should be used efficiently.	<p>-The water is only used for drinking and ablution facilities.</p> <p>-There are no sign of water wastage onsite.</p>	FULLY COMPLIANT	<p>-Continued water saving awareness to workers.</p> <p>-Water should be re-used and recycled, where possible.</p>
Littering and waste management	-The waste management at the site.	-There are currently no signs of litter on and around the site.	FULLY COMPLIANT	-The continued management of different waste is highly encouraged.

Aspect	Activity	EMP Implementation and Observations	Compliance Status	Required Action Measures
		<p>-Solid waste is disposed of at a self-managed dumpsite near the fuel station.</p> <p>-Waste is properly contained in respective bins and area for disposal by the relevant waste collectors.</p>		
Waste generation	<p>There is a generation of both general, and human waste on site.</p> <p>Potential soil polluted by hydrocarbons that may be handled on site especially from accidental oil or fuel leaks from vehicles or equipment should be treated as hazardous waste</p>	<p>-The waste should continue to be disposed of at approved and appropriate waste facilities.</p> <p>-The waste is properly sorted and disposed of accordingly. The solid waste is disposed of at small self-managed dumpsite in the site vicinity.</p> <p>-Sewage is managed through the sewer reticulation system connected onsite.</p> <p>-There is adequate ablution facilities on site to better manage sewage.</p>	FULLY-COMPLIANT	<p>-Maintain the regular removal of waste to maintain visual orderliness, but more so to not give time for liquid waste to enter the soil substrate. Dry waste is at risk of increasing the dust / litter impact so should be removed regularly. Recycling of solid waste should be encouraged to minimise the amount of waste that goes to landfill.</p>

Aspect	Activity	EMP Implementation and Observations	Compliance Status	Required Action Measures
Pollution of water resources	Product spillages and eventually runoff of polluted water can be washed into open water systems (surface water) and eventually into aquifers, cause groundwater pollution	<p>-There are oil-water separator structure onsite to capture any accidental spills of fuels and other hazardous waste onsite, particularly from the tanks refilling and refuelling areas.</p> <p>-The site is well covered with interlocks to minimize the risk of liquid waste from infiltrating as fast into the soils and eventually water resources.</p> <p>-The fuel storage tanks are installed inside bunded and impervious double layers to minimize and even prevent surrounding soil and groundwater pollution.</p>	FULLY COMPLIANT	<p>-Spill control preventive measures should be in place onsite to manage soil contamination, thus preventing and or minimizing the contamination from reaching groundwater.</p> <p>-Site areas where hydrocarbons are intensively handled such as tanks refiling, the surface should be covered with a temporary impermeable plastic liner (e.g., an HDPE liner), to prevent any spillages from getting into direct contact with the soils and prevent eventual infiltration into the ground.</p> <p>-Heavy vehicles refiling site tanks should be equipped with drip trays to contain possible oil spills.</p> <p>-All wastewater and hydrocarbon substances and other potential pollutants associated should be contained in designated containers onsite and later disposed of at nearby approved waste sites.</p> <p>-In cases of accidental fuel or oil spills on the soils from site vehicles, machinery and equipment, the polluted soil should be removed immediately and put in a designate waste type container for later disposal at an approved suitable waste site.</p> <p>-The servicing and washing of hydrocarbon contaminated vehicles and equipment should be done at a dedicated area, where contaminants are prevented from contaminating soil or water resources.</p>

Aspect	Activity	EMP Implementation and Observations	Compliance Status	Required Action Measures
Vehicular Traffic use and Safety	The site is located off the C41 road and operational activities are may potentially have some impact on the movement of traffic to the site (on the C41 and site access roads) when transporting material, supplies and equipment.	<ul style="list-style-type: none"> <li>-The project vehicles only make use of the existing access road to the site.</li> <li>-All project related motor vehicle drivers have the required licenses to do so.</li> <li>-Traffic management systems are in place.</li> <li>-There are sufficient parking bays for vehicles onsite.</li> <li>-Appropriate road signage and warnings are erected and visibly onsite.</li> </ul>	COMPLIANT	<ul style="list-style-type: none"> <li>-The project vehicles should avoid creation of new tracks (roads).</li> <li>-The vehicles should be driven at the speed of 40km/hr when on the access road and onsite.</li> <li>-No person shall drive or use any vehicle on site whilst under the influence of alcohol or any other narcotic substance or in such a way that is dangerous to human life or that may cause damage to any property or the environment.</li> <li>-Plan traffic management programme for sections of the roads to be closed off or traffic diverted if necessary, during fuel delivery.</li> </ul>
Accidental Fires	Outbreak of an uncontrolled fire due to the fire sparks caused by the fuel onsite during tanks refilling or refuelling and or presence of open fires created on onsite.	<ul style="list-style-type: none"> <li>-Safety talks and job hazard analysis are done and provided to all new workers and during refresher trainings.</li> <li>-Personnel (workers) are aware of the danger of fire and avoiding activities that may result in fire outbreaks.</li> <li>-There is sufficient firefighting resources are available (four fire extinguishers onsite)</li> <li>-There are clear and visible signage on NO OPEN FLAMMABLES or SMOKING close to the fuel filling area or tanks.</li> </ul>	FULLY-COMPLIANT	<ul style="list-style-type: none"> <li>-Firefighting measures as per the Material Safety Data should be provided, implemented, and adhered to.</li> <li>-All personnel must be sensitised about responsible fire protection measures and good housekeeping such as the removal of flammable materials including rubbish, dry vegetation, and hydrocarbon-soaked soil from the vicinity of the site. Regular inspections should be carried out to check for these materials at the site.</li> <li>-Site personnel (or at least some) should be provided with basic firefighting skills (how to use the fire extinguishers onsite) in case of accidental fire outbreaks.</li> <li>-A fire detection and an alarm system should be installed under the canopy and in the Convenience Store, particularly the kitchen where food is made.</li> </ul>

Aspect	Activity	EMP Implementation and Observations	Compliance Status	Required Action Measures
				<p>-A holistic plan must include an emergency response plan and firefighting plan. Regular surveys of the fire-fighting equipment and water supply should be carried out.</p> <p>-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.</p>
Dust and gaseous emissions	Dust generated during the operations is expected from untarred roads, particularly on windy days.	-There are no air quality issues observed onsite or based on the site personnel interview.	COMPLIANT	<p>-Regular dust suppression (using a reasonable amount of water) should be implemented when dust becomes an issue onsite (untarred access).</p> <p>-Vehicles should be driven at 40km/hr when on the site access untarred road to prevent dust generation.</p> <p>-Vehicles and machinery should not be left idling.</p> <p>-Personnel are to be issued with dust masks for health reasons when needed.</p> <p>-A complaints register of dust generated or harmful gas emitted from site related activities must be maintained.</p>
Noise	Noise impact to both the site workers and surrounding communities	-There are no complaints of noise	FULLY COMPLIANT	-It is recommended that a complaints register be kept and that the community around the service station be made aware of the register.

Aspect	Activity	EMP Implementation and Observations	Compliance Status	Required Action Measures
				<p>-Should there be persistent complaints, further investigation of noise mitigation options at the site is recommended.</p> <p>-Heavy vehicles and machinery should not be left idling when not in use.</p> <p>-Avoid excessive noisy activities between 5pm and 8am.</p>
<p>Impact on biodiversity (fauna and flora) and ecosystem</p>	<p>Impacts on the ecosystem from the project related activities and vehicle movements may lead to land degradation, and killing/harming of local animals.</p>	<p>-The site is within the rural set up, but there is little to no vegetation (trees). However, the site area maybe be frequented by local livestock such as goats and cattle that may graze around the site.</p> <p>-There are no reported and recorded incidents of project workers implicated in the stealing or harming of livestock around the site.</p> <p>-The remaining little vegetation onsite is preserved.</p>	<p>FULLY COMPLIANT</p>	<p>-Project activities should be limited within the site boundaries.</p> <p>-All employees should be educated about the value of biodiversity (no killing or snaring and trapping of animals).</p> <p>-Strict conditions prohibiting harvesting of flora and snaring/stealing of local livestock occurring in the area should be incorporated into employment contracts.</p> <p>-Killing, injuring, capturing, disturbing, or feeding of any animal or remove any part of any wild animal, whether alive or dead is prohibited.</p> <p>-No removal, destroying, damage or disturb of any egg, nest, or burrow on and around the site is allowed.</p> <p>-A register of all plant and animal species encountered within the site premises and boundary should be recorded. Photos should be taken and recorded. The details should include date of encounter, animal name and location. This include snakes. Do not kill any of them.</p>



## 5 ENVIRONMENTAL MONITORING, COMPLIANCE AND AUDITING

To ensure compliance with the legal requirements, minimize potential adverse impacts and improve environmental sustainability, some monitoring activities are recommended for the site. These recommended monitoring exercises are to be implemented as follows:

### 5.1 Monitoring of EMP Implementation and ECC Renewal

- Environmental (during the validity period of the ECC): Bi-Annual Compliance Monitoring of the EMP implementation should be undertaken throughout the project cycle, i.e., twice a year (every 6 months) throughout the operations. Environmental Monitoring reports are to be compiled and submitted to the Department of Environmental Affairs and Forestry (DEAF) for archiving through provision made on the ECC Portal (once the ECC issued). This practice will make the ECC renewal easier when it is about to expire in future. Therefore, the Proponent should effectively monitor the EMP implementation and submit the monitoring reports to the DEAF. The submission is not only done for record keeping purposes, but also in compliance with the environmental legislation and conditions of the new ECCs.
- Environmental Compliance Checklist: To make impact monitoring and EMP compliance easy, the Proponent should keep an Impact-Indicator Checklist that can be used by the SHE Officer and updated every 6 months. If found to be necessary, the checklist should contain the management action recommended in the EMP in a "Questionnaire" format, observations, recommended further action, date of monitoring and next proposed monitoring date.

### 5.2 Environmental Awareness

Namfocus Investment should ensure that its employees and any third party who carries out all or part of their obligations are adequately trained regarding the implementation of the EMP, as well as regarding environmental legal requirements and obligations. Training may be conducted by the ECO/SHE Officer, where necessary.

Environment and health awareness training programmes should be targeted at three distinct levels of employment, i.e., the executive, middle management, and labour. Environmental awareness training programmes shall contain the following information:

- The names, positions, and responsibilities of personnel to be trained.
- The framework for appropriate training plans.
- The summarized content and schedule for the presentation of the training courses.
- The ECO/SHE Officer shall ensure that records of all training interventions are kept in accordance with record keeping and documentation control requirements as set out in this EMP. The training records shall verify each of the targeted personnel's training experience.

The recommendations and conclusions made for this document are under the next chapter.

## 6 RECOMMENDATIONS AND CONCLUSIONS

### 6.1 Recommendations

The Namfocus Investment Fuel Service Station (the site) was visited to observe and assess the implementation of the EMP onsite for the purpose of the project's ECC renewal. The project is of small to medium-scale level and activities are well limited within the site boundaries. From site observations, the Proponent has been compliant with the EMP requirements as recommended within the current ongoing project phase (operations and maintenance). However, improvements are needed in some areas of implementation. The components of the EMP (management measures) that were recommended for the current project activities have been fully implemented and this has been observed with onsite biophysical and social environmental and around the site.

The only non-compliance component observed is the absence of environmental monitoring records of EMP compliance monitoring (Bi-Annual Monitoring) done for the site since the issuance of the expired ECC. However, the lack of monitoring can be improved going forward, with the assistance of the Environmental Consultant or project SHE Officer and the Proponent's full commitment and co-operation.

Therefore, Serja Consultant are confident that the potential negative impacts associated with the project activities onsite can continue to be mitigated by effectively implementing the recommended management action measures and with more effort and commitment put on implementation monitoring (Bi-Annual Environmental Monitoring and reporting). It is therefore, recommended that the project and its associated activities be granted a new Environmental Clearance Certificate, and provided that:

- All the management measures (mitigations) provided herein and as developed throughout the project implementation continue to be implemented effectively with compliance emphasis pointed out in Table 4-2 and where required, improvement should be effectively put in place.
- All required permits, licenses, approvals, and document renewals for the project activities now and in future are obtained as required.
- The Proponent and all their project workers, contractors and or specialists comply with the legal requirements governing their project and its associated activities.
- All the necessary environmental and social (occupational health and safety) precautions provided are adhered to.
- To avoid late renewal of the project ECC, the Proponent' SHE Officer and or Environmental Consultant should effectively conduct EMP Compliance through Bi-Annual Monitoring and most importantly, ensure timely renewal of the ECC. The ECC renewal application should be submitted at least one month before the expiry date of the valid ECC. This is to allow time for the evaluation of the ECC application and Updated EMP by the DEAF and approval by the Environmental Commissioner.

- The EMP Compliance check (Bi-Annual Monitoring) should be done. The monitoring exercise can be undertaken either by the project SHE Officer and audited by an external independently appointed Environmental Assessment Practitioner (EAP) / Environmental Consultant or just by the EAP when applying for an ECC renewal. However, there should be records of monitoring reports that an EAP can audit for ECC renewal. Therefore, Environmental Bi-Annual monitoring reports shall be compiled for every monitoring and submitted to the DEAF at the MEFT for archiving (via the ECC Online Portal under the valid ECC details). This would make the next ECC renewal easier because of an in-between track record of monitoring prior to the expiry date of the ECC.

## 6.2 Conclusions

The Environmental Consultant recommends that the expired ECC be renewed so that the Proponent can continue with the project activities and continue to positively impacting the community and nation through the existing economic opportunities.

The site is generally well-kept and equipped with the necessary and required services infrastructure, well-maintained and adheres to the site and activity-specific environmental management requirements. Therefore, the Environmental Consultant is of the same hope that Namfocus Investment will continue to maintain the same commitment towards environmental sustainability, and ensure timely renewal of the ECC.

Therefore, it is crucial for the Proponent, their workers, contractors and or specialists to continue with the effective implementation of the recommended management measures to protect both the biophysical and social environment and promote sustainable development.

**APPENDIX A: COPY OF THE EXPIRED  
ENVIRONMENTAL CLEARANCE CERTIFICATE (ECC) -  
ECC00802**



**REPUBLIC OF NAMIBIA**  
**MINISTRY OF ENVIRONMENT, FORESTRY AND TOURISM**

OFFICE OF THE ENVIRONMENTAL COMMISSIONER

**ENVIRONMENTAL CLEARANCE CERTIFICATE**

**ISSUED**

In accordance with Section 37(2) of the Environmental  
Management Act (Act No. 7 of 2007)

**TO**

**NAMFOCUS INVESTMENTS CC**  
**P.O BOX 887, WINDHOEK**

**TO UNDERTAKE THE FOLLOWING LISTED ACTIVITY**

**CONSTRUCTION AND OPERATION OF A RETAIL FUEL STATION AT  
ONDALAE YA ELIM GROWTH POINT, OMUSATI REGION**

Issued on the date: **2020-07-30**  
Expires on this date: **2023-07-30**

  
**ENVIRONMENTAL COMMISSIONER**  
MINISTRY OF ENVIRONMENT, FORESTRY AND TOURISM  
Private Bag 13306  
WINDHOEK, NAMIBIA  
**05 AUG 2020**  
ENVIRONMENTAL COMMISSIONER  
REPUBLIC OF NAMIBIA

(See conditions printed over leaf)

Reduce  
Reuse  
Recycle



**CONDITIONS OF APPROVAL**

1. This environmental clearance is valid for a period of 3 (three) years, from the date of issue unless withdrawn by this office
2. This certificate does not in any way hold the Ministry of Environment and Tourism accountable for misleading information, nor any adverse effects that may arise from these activities. Instead, full accountability rests with the proponent and its consultants
3. This Ministry reserves the right to attach further legislative and regulatory conditions during the operational phase of the project