ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR WASTE OIL MANAGEMENT PLANT

LOCATION: ERF 2613, LIGHT INDUSTRIAL AREA, WALVISBAY, NAMIBIA.



Assessed by:

Assessed for:







Project:	ENVIRONMENTAL IMPACT A	SSESSMENT REPORT FOR WASTE
	OIL MANAGEMENT PLANT	
	LOCATION: ERF 2613, LIGHT	INDUSTRIAL AREA, WALVISBAY,
Donort:	NAMIBIA.	
Keport: Version/Date:	March 2024	
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DECLARATION

I Innocent Dausab acting as the proponent's representative (GAC Investment cc) hereby confirms that the project description contained in this report is a true reflection of the information which the proponent has provided to CEMAP Consultants. All material in the position of the proponent that reasonably has or may have the potential of influencing any decision or the objectivity of this assignment is fairly represented to this report.

Signed at Walvisbay GAC Head Office on this day 20 of March 2024

cc2011/5835

GAC Investment Representative

Business Registration Number



EXECUTIVE SUMMARY

GAC Investment contacted CEMAP Consultants to carry out an Environmental Impact Assessment for the proposed Waste Management Plant situated at ERF 2613, Light Industrial Area, Walvisbay, Namibia. This was to comply with the Legal requirement stipulated in the Environment Management act of 2007 and the subsequent Environmental Management Regulations Government Notice No. 28-30 of 2012.

GAC Investment cc is an already established business offering collection of and re-selling of waste oil to waste oil recycling companies such as Exigrade and Wesco in Walvis Bay. Used oil is collected from the ship vessels, cruise boats and cruise ships at the Port of Walvisbay.

Refinery technologies have enabled used oil to be recycled for reuse and avoid environmental pollution caused by unsafe disposal. The used oil can be recycled and reused as motor oil, engine oil, or engine lubricant and lubricant for various internal combustion engines after reprocessing and regeneration of used oil. This includes gear oil which is a lubricant made specifically for transmissions, transfer cases, and differentials in automobiles, trucks, and other machinery. It is of a higher viscosity to better protect the gears. The high viscosity ensures transfer of lubricant throughout the gear train. In some cases, waste oil can be mixed in small quantities with diesel to enhance running efficiency and fuel conservation in diesel engines.

Planning for environmental protection is a crucial part of the overall design and execution of large-scale projects. According to the Environment Management act of 2007, industrial activities, including those associated with the waste management and construction of Waste Oil Recycling Plant, are reviewed and approved by Government agencies including the Environmental Commissioner, local authorities etc. through a variety of approvals, authorizations and permits addressing issues ranging from human health and sanitation to fisheries and wildlife habitat avoidance or protection. Hence, this Environmental Impact Assessment was conducted.

The EIA process involved:



- Environment screening, in which the project was identified as among those requiring environmental and social impact assessment under the Environment Management act of 2007 and Environmental Management Regulations Government Notice No. 28-30 of 2012.
- Environmental scoping that provided the key environmental issues.
- Desktop studies and interviews.
- Physical inspection of the site and surrounding areas.
- Photography and data collection on the key elements constitution of the environmental resources (waste oil collection points) within the study area.
- EIA Public Participation via the use of questionnaires, door to door enquiries, stakeholder engagement and public meetings.
- Reporting.

A number of social and environmental impacts were identified. This include both positive and negative impacts. The positive impacts include:

- Employment opportunities,
- Contribution to the country's GDP,
- Business opportunities for informal traders,
- Business opportunities to other businesses such as local construction material suppliers, transport operators, etc.,
- Effective waste oil management, and
- Optimal land use.

Whereas, the negative impacts include:

- Oil spillages,
- Waste management,
- Effluent discharge,
- Occupational health and safety,
- Fire risk,
- Increased traffic,
- Air and noise pollution, among impacts.



Mitigation strategies to the Environmental Impacts were developed which led to designing of an Environmental Management Plan (EMP). An EMP is crucial as it serves as a bridge between the many permits, authorizations, and approvals obtained for different endeavor operations or components. This EMP outlines the contents of construction, operational phases and decommissioning of the waste oil management plant. It constitutes a contract document for use in the field by the contractor(s) and their personnel during construction as well as by the personnel of GAC during operations. Through its engineering and environmental consulting team, GAC and its construction contractor are in charge of putting the EMP into practice and making sure that all staff members are aware of it and the need to follow the procedures it entails. The EMP is designed to be an easy-to-use tool for project staff and regulatory bodies to track compliance, and it can be easily updated and revised as work progresses.



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1. INTRODUCTION

1.1. Background and Rational for an Environmental Impact Assessment

GAC Investment contacted CEMAP Consultants to carry out an Environmental Impact Assessment for the proposed Waste Management Plant situated at ERF 2613, Light Industrial Area, Walvisbay, Namibia. This was to comply with the Legal requirement stipulated in the Environment Management act of 2007 and the subsequent Environmental Management Regulations Government Notice No. 28-30 of 2012.

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decommissioning of the waste oil management plant. It constitutes a contract document for use in the field by the contractor(s) and their personnel during construction as well as by the personnel of GAC during operations. Through its engineering and environmental consulting team, GAC and its construction contractor are in charge of putting the EMP into practice and making sure that all staff members are aware of it and the need to follow the procedures it entails. The EMP is designed to be an easy-to-use tool for project staff and regulatory bodies to track compliance, and it can be easily updated and revised as work progresses.

1.2. Scope, objective and criteria of the Environmental Impact Assessment (EIA)

1.2.1. Scope

The EIA & EMP lists several priority strategies and actions pertaining to these locations. The primary goals of the EIA & EMP are the protection of the environment, traffic management, and activities directly under the control of GAC management that have the potential to have a significant negative environmental impact. The EIA & EMP facilitates cooperation and coordinated efforts with the various stakeholders, regulators, clients and suppliers within the purview of the GAC.

In line with various regulatory frameworks, the following criteria will be used to determine priorities for attention:

- Impact on the physical and biological environment;
- The baseline environmental conditions of the area.
- Provisions of the relevant environmental laws.
- Seeking views through public participation and consultation.
- Identification and discussion of any adverse impacts to the environment anticipated from the proposed project.
- Appropriate mitigation measures.



- Provision of an environmental management plan outline.
- Occupational and Environmental health and safety management.
- Analysis of alternatives.

The EIA & EMP acknowledges the social and cultural dimensions of responsible environmental management alongside the biological and physical, reflecting a holistic view of the GAC as a "human ecosystem".

The scope of the EIA & EMP includes the following functional areas:

- Management systems: Those systems employed in the management of the GAC's operational activities. It will include financial systems; engagement and supervision of contractors; purchasing policies, etc.
- Knowledge systems: Those processes which build knowledge and capacity on environmental issues, principles and sustainable behaviors. It will include training; communications; campaigns; links with operational departments, etc.
- Energy management: The energy-related aspects of the planning, design, construction, operation and maintenance of the GAC's oil waste management plant.
- Water management: Aspects of supply, usage and disposal of water pertinent to the planning, design, construction, operation and maintenance of the GAC's oil waste management plant.
- ✓ Materials management: Those services and activities which support the avoidance, resource recovery (e.g. reuse and recycling) and environmentally responsible disposal of solid and liquid waste materials.
- Planning, design and development: The planning, design and development of the GAC's plant and associated infrastructure.
- Pollution prevention: Those aspects of planning and management which support minimization of air and water pollution and contamination of land resulting from daily routine activities.



- Transport: Programs, projects, systems and procedures which promote and support safe transportation of waste oil to and from the supplier, plant and customers.
- Biodiversity and open space: Those aspects of management and maintenance which support conservation and enhancement of biodiversity and environmentally sustainable use of open space across GAC and other properties.

1.2.2. Objectives of the EIA

The purpose of the EIA & EMP is to offer guidelines and recommendations for conducting compliance monitoring while the proposed Waste-Oil management plant is being built and operating. In order to guarantee ecologically responsible building activities, the EIA & EMP also aims to make sure that all pertinent elements are taken into account. The EIA & EMP's objective is to establish guidelines for the implementation of "good environmental practice" across all stages of development. With specific reference to the prevention and mitigation of anticipated potential environmental impacts, this EMP notifies all pertinent parties, the Project Proponent, the Contractor(s), and any other employees working at the site and transportation of the waste oil of their responsibilities in carrying out the legal requirements for the construction and operation of the proposed waste-oil management plant.

The overall objective of the study is to assess the potential significant adverse impacts of the proposed development and articulate appropriate mitigation measures. The specific objectives of this study include the following:

- i. To identify and evaluate the significant environmental impacts of the proposed project.
- ii. To assess the environmental costs and benefits of the proposed project to the local and national economy.
- iii. To determine the compatibility of the proposed facility with the local environmental setting.
- iv. To evaluate and select the best project alternative from the various options.



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- v. Ensure compliance with regulatory authority stipulations and guidelines which may be local, national and/or international;
- vi. Verify environmental performance through information on impacts as they occur;
- vii. Provide feedback for continual improvement in environmental performance;
- viii. Respond to unforeseen events;
- ix. Identify a range of mitigation measures which could reduce and mitigate the potential impacts to minimal or insignificant levels;
- x. To incorporate Environmental Management Plans and monitoring mechanisms during implementation, operation and decommissioning phases of the project.

1.2.3. Purpose and terms of reference

The purpose and terms of reference developed for this project study is to assess the impacts that may arise during the construction/installation, operational and decommissioning phases of the proposed development. These are the impacts anticipated from the project to the surrounding business area, environment, and community.

The terms of reference developed for this study therefore covered the following:

- The objectives of the project.
- Describe to details the baseline condition of the project area.
- Give a detailed outline of regulatory and legislative framework related to the project.
- To describe the potential impacts that may occur during the construction, operational and decommissioning phases.
- To describe the technology, materials, procedures, and process to be used in the implementation of the project.



- To describe the potential effects of the development on both the natural and human environment, and the likely products and by-products and waste generated by use of the project and how they would be treated or disposed taking into account health and safety matters.
- The impact imposed on existing infrastructure.
- Propose suitable mitigation measures for the identified impacts.
- Describe if any, alternative technologies and processes available and reasons for the preferred chosen location, technology and process.
- Develop a comprehensive environmental management plan proposing the measures for eliminating, minimizing or mitigating adverse negative impacts on the environment including the cost, timeframe and responsibility to implement the measures.
- To develop the monitoring plan.
- Offer conclusion and recommendation, and
- To apply for an Environmental Clearance Certificate from the Environmental Commissioner in terms of the Environment Management act of 2007.

1.2.4. Data collection procedures

First, the Consultant undertook environmental screening and scoping to avoid unnecessary data. The data collection was carried out through questionnaires/standard interview/public meetings schedules, use of checklists, observations and photography, site visits and desktop environmental studies, where necessary in the manner specified in the Environment Management act of 2007 and Environmental Management Regulations Government Notice No. 28-30 of 2012.

1.2.5. EIA organization and structure

The EIA was carried out to full completion in line with the Environment Management act of 2007 as specified in Environmental Management Regulations Government Notice No.



28-30 of 2012. The Consultants (CEMAP Consultants) coordinated the day-to-day functions and any related institutional support matters during the development of this EIA. Otherwise, all formal communications were directed to relevant authorities through the proponent.

1.2.6. Reporting and documentation

The Environmental Impact Assessment study report from the findings was compiled in accordance with the guidelines issued in the Environment Management act of 2007 and Environmental Management Regulations Government Notice No. 28-30 of 2012 for such works and was prepared and submitted by the proponent for consideration and approval. The Consultant ensured constant briefing of the client during the exercise. Description plans and sketches showing various activities are part of the Appendices.

1.2.7. Responsibilities and undertaking

The Consultant (CEMAP Consultants) undertook to meet all logistical costs relating to the assignment, including those of newspaper adverts, printing of site notices, public consultation and revenue stamp as outlined in the EMA approved TOR. The consultant arranged for own transport and travels during the exercise. On the site of the proposed waste oil management plant, the proponent provided contact persons to provide information required by the consultant. The proponent also provided site plans showing roads, service lines, buildings layout and the actual sizes of the sites, details of raw materials, proposed process outline, future development plans, operation permits and conditions, land-ownership documents and site history. The output from the consultants includes the following:

• An Environmental Impact Assessment study report comprising of an executive summary, study approach, baseline conditions, anticipated impacts and proposed mitigation measures.



• An Environmental Management Plan outlines which also forms part of the report recommendations.

1.2.8. Methodology outline

Given the scale of the proposed project and the environmental conditions of the project area, Environmental Impact Assessment study was opted for to ensure comprehensiveness and completeness of the assessment. The general steps followed during the assessment were as follows:

- Environment screening, in which the project was identified as among those requiring environmental and social impact assessment under the Environment Management act of 2007 and Environmental Management Regulations Government Notice No. 28-30 of 2012.
- Environmental scoping that provided the key environmental issues.
- Desktop studies and interviews.
- Physical inspection of the site and surrounding areas.
- EIA Public Participation via the use of questionnaires, door to door enquiries, stakeholder engagement and public meetings.
- Reporting.

1.2.8.1. Environmental screening

This step was applied to determine whether an environmental impact assessment was required and what level of assessment was necessary. This was done in reference to requirements of the Environment Management act of 2007 and Environmental Management Regulations Government Notice No. 28-30 of 2012. Issues considered included the physical location, sensitive issues and nature of anticipated impacts.



1.2.8.2. Environmental scoping

The scoping process helped narrow down onto the most critical issues requiring attention during the assessment. Environmental issues were categorized into physical, natural/ecological and social, economic and cultural aspects.

1.2.8.3. Desktop study

This included documentary review on the nature of the proposed activities, project documents, designs policy and legislative framework as well as the environmental setting of the area among others. It also included discussions with key stakeholders, managers and design engineers, as well as interviews with site neighbours.

1.2.8.4. Site assessment and public participation

Field visits were meant for physical inspections of the site characteristics and the environmental status of the surrounding areas to determine the anticipated impacts. To ensure adequate public participation in the EIA process, public meetings and key stakeholders meeting were held and site neighbours were engaged through door-to-door visits and emails and the information gathered was subsequently synthesized and incorporated into the EIA project study report.

1.2.8.5. Reporting

In addition to constant briefing of the client, this Environmental Impact Assessment study report was prepared. The contents were presented for submission to Environmental Commissioner as required by law.



2. PROJECT DESCRIPTION

2.1. Project Background

The Waste Oil Management plant entails processes of filtering, separation and cleaning of used oil while both used and re-refined oil are stored in tanks on site. The waste oil recycling and storage plant will process 83000liters at a time. Once processed, the recycled oil will be sold to oil blending companies for further processing. The environmental impact assessment is conducted to determine all environmental, safety, health and socio-economic impacts associated with the operations of the facility. Relevant environmental data was compiled by making use of secondary data and from a reconnaissance site visit. Potential environmental impacts and associated social impacts were identified and are addressed in this EIA/EMP report.

2.2. The Project location

The proposed project is located and situated at ERF 2613, Light Industrial Area, Walvisbay. The neighborhood of the site features commercial and industrial activities.





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2.3. Project Description and Design

Lubricating (motor oil, engine oil, hydraulic, gear box oil, turbine oil etc.) oil is widely used in the fields of manufacturing, transportation, marine industry etc. With the development of national economy, the demanded quantity is increasing. Lubrication oil is used for lubricating, cooling, antirust, sealing, buffering purpose in all sorts of machineries. Because contaminated by dust, metal from environment, and working in high-speed parts, contacting with air and polymerization, condensation, oxidation etc. Reactions occurred. The lubricating oil is gradually deteriorating during using, the main appearance is the color become darker, acidity number increasing, odor discharging, and oil sludge, precipitate produced. In fact, lubricating oil is deteriorated 1-10% of its hydrocarbons, most of the rest hydrocarbons are still the viscosity performer and effective components, and this is the potential motivation of waste lubricating oil regeneration.

Used lubricating oil contains oxygen-carrying, nitrogen-carrying, sulfur ate-carrying organic compound, and chemical additives, dumping or burning these lubricants would generate a lot of pollution and waste energy resource. With the increasingly dried-up of petroleum resource and strengthening of environmental consciousness as well rising of oil price, regeneration of used oil is attached importance by the countries worldwide. Regeneration of used oil could save energy resource, change waste in to valuables, reduce its pollution to environment, has great economic and social benefits.

Recent years, the advanced countries in the world deeply researched the used lube oil recycling process and found that it has great emphasis on environment protection, making used oil not pollute environmentally, no secondary pollution during regeneration, saving energy consumption, pollution free, upsizing and having high recovery rate.

2.3.1. Used oil segregation process

The oily water coming from bilge enters the separator through the top part by means of an inlet pipe and meets a screen which makes the water flow in a loop, entering then, in the first stage of the coalescer filter. A first separation of the bigger oil droplets occurs in the upper zone of the bank and before entering the filter. The bigger oil droplets float to the top of the tank.



Next the oily water will enter the first filtration stage and come into contact with the polypropylene filter. This filter attracts oil and repels water, the oil droplets grow in size and finally float to the top of the tank. The oily water then goes through to a rest zone and again through a second filtration stage being discharge by the bottom part of tank.

As the mixture is being processed, the oil volume in the top of the tank increases until an electrode detector (LS3) detects the interface water/oil level and the oil discharge starts up.

At this stage the pump will automatically stop, the flushing water valve VS18 and the oil discharge valve V8 will open, discharge valves V16 and V17 will close. Under this condition the water will enter through the bottom part of the of the of the separator, discharging to the sludge tank through valve V8, oil discharge and back flushing are carried out at the same time. Once the interface sensor detects the adequate level of oil, the separator continues processing normally, the pump starts automatically and valves return at their initial state.

It is also possible to carry out the cleaning of the coalescer filter manually selecting "CLEANING" mode in the control panel, which produces flushing water intake and the discharge to the bilge or oily water tank through valve V7. If the mixture of water and hydrocarbons which the gravity separator processes are a free mixture and not emulsified, the discharge of the first stage will contain less than 15ppm and the second stage will not come into service, in this way extending the life-time of the adsorption cartridges.

Only when there is a part of the mixture of water-hydrocarbons which the gravity separator processes are a free mixture and not emulsified, the discharge of the first stage will contain less than 15ppm and the second stage will not come into service, in this way extending the life-time of the adsorption cartridges. Only when there is a part of the mixture of water-hydrocarbon emulsified, the first stage will not be able to separate the emulsion and therefore automatically the second stage of treatment will come into effect, through the absorption stage, opening V5 and closing V6.



It is foreseeable that the hydrocarbon content in the effluent will be below 15ppm discharging water to the sea through connection "E". If for any reason, the sample have a hydrocarbon content higher than 15 ppm the discharge valve to the sea V16 would close and the recirculation to bilges V17 would open. If this situation continues for more than 10 seconds, the equipment would be blocked and stopped automatically.

If, on the contrary, the situation is re-established before this period of time, that is, the samples have a content of hydrocarbons lower than 15 ppm, the equipment would automatically change closing V17 recirculating valve and opening V16 overboard discharge valve.

A sample of the content of hydrocarbons is also taken before the second stage because of this, automatic by-pass of this stage will be always done when detecting <12 ppm on the separator's outlet, closing V6. All operations are automatically controlled through the control panel.







2.4. Construction Inputs/ Raw Materials

The construction and operation phases of this project will utilize a lot of inputs and raw materials. The proponent and contractor are expected to procure building materials from licensed dealers. Besides, they have must meet both local and international safety and quality standards.

Main inputs during construction include metal and steel tanks and containers, building blocks, sand, gravel, glasses, hand cut construction stones, timber for making structural formwork and interior design.

2.5. Description of the Project's Construction Activities

2.5.1. Description of the waste oil storage tanks/plant

The waste oil storage tanks will be built in accordance to ISO 9000 regulations i.e.:

- Storage tanks shall be non-corrosive and resistant to oil and water, with no draindown pipe,
- All of the tank shall be contained with valves and taps pointing downwards and locked when not in use,
- Delivery pipes shall always be attached to the tank, with self-closing taps or valves inside that are locked when not in use,

The storage tank will be fitted with secondary containment bund for safeguarding the surroundings from potential oil contamination. According to ISO 9000 regulations the bund walls shall meet the following specifications:

- Used oil tanks or containers that are not double-walled must have a secondary containment tank or container that can hold 110% of the volume of the largest tank or container within the containment area.
- The floor surface shall be in good condition and is oil-impermeable.
- The walls connect to the floor.
- The structure has the capacity to collect the used oil if it spills.



2.6. Staff Amenities

2.6.1. Site Office

The proponent is to construct a modest site office.



2.6.2. Sanitary Waste Management

Only sanitary waste from the site office will be channeled into the municipal sewage system. The waste water from the waste oil plant will not be channeled into the sewage system, but rather rechanneled to the recycling plant for the segregation process. Excess water will be disposed as recommended by the Municipality of Walvisbay's water and sanitation department.

2.6.3. Non-Hazardous Materials

The store for non-hazardous materials will be accommodated within the site office. Materials to be stored in this store shall include samples for review by consultants and inspectors.



2.6.4. Hazardous Materials

Hazardous materials shall include paints, oil, grease and fuel. The store for these materials shall have iron sheet walling and roof and a waterproof concrete floor to contain spills. Storage and handling of all Hazardous chemicals shall be in accordance with manufacturer's instructions as outlined on the material safety data sheets.

2.6.5. Bulk Construction Materials

The bulk materials to be stored on site include: sand, ballast, stones, cement, quarry chips and timber. However, to avoid material accumulation with potential for obstructing site activities, inducing safety hazards and creating a nuisance in the neighborhood, the main contractor intends to have materials delivered in small quantities.

2.7. Description of the Project's Operational Activities

Completion of construction activities will be followed by operation of the used oil storage and transfer station with three overhead farm tanks. The activities to be carried out during the operation phase of the proposed project include: transportation and storage of used oil from the port to the site, the waste oil will be sold to waste oil recycling firms.

2.8. **Project's Decommissioning Activities**

During decommissioning, of this waste oil management plant project it's advisable to return the excavated land to its original state. Analysis of the soil should be done to check on the salinity levels and the land should be rehabilitated.

2.9. Responsibilities

2.9.1. Proponents' Responsibilities

The proponent will have to ensure that all legal provisions and standardization benchmarks are observed. In this regard, the proponent shall ensure that:



- Be responsible for obtaining any further environmental permits which are required for the design, construction and operation of the development
- Ensure that all third parties who carry out all or part of the Proponent's obligations during the construction and operation of the plant shall comply with the requirements of this EMP
- Building and mechanical materials are of high quality and from accredited dealers,
- Sanitary facilities are provided and hygiene observed,
- Avail a first aid tool kit,
- Ensure that any accident is well attended to and medical bills paid,
- All workers are duly compensated for their services,
- The proponent shall provide a room at the site for logistic purposes, and
- He will provide a dressing and changing room to all workers.
- Ensure that the infrastructure is maintained and functional during the operational phase of the development.

2.9.2. Environmental Control Officer (ECO)

The proponent should appoint an Environmental Control Officer to oversee the implementation of the EMP during site establishment, operation and possible decommissioning project phase. The ECO can be an employee of the proponent or an outside/independent EAP. The ECO should be responsible for the following tasks.

- Ensure that all contractor and sub-contractors are complying with the content of this ESMP.
- Keep record of incidences during and take corrective actions i.e., issuing of penalties in case of transgressions etc. during project implementation.



- That all environmental impacts are managed according to the environmental principles of avoiding, minimizing, mitigating, and rehabilitation as contained in this EMP.
- Conduct monitoring and review of the on-site environmental management and implementation of the EMP by the Contractor and sub-contractors.
- Audit the implementation of the EMP on a regular basis
- Compile and submit an Environmental Reports (annually) to the Authority

2.9.3. Contractors' Responsibilities

The project Contractors are responsible for:

- The finalization of the EMP in terms of methodologies (method statements) which are required to be implemented to achieve the environmental specifications contained herein and the relevant requirements contained in the environmental authorization, if issued by Environmental Commissioner;
- The overall implementation of the EMP in accordance with the requirements of the environmental authorization, if issued by Environmental Commissioner;
- Ensuring that all third parties who carry out all or part of the Contractor's obligations under the Contract comply with the requirements of this EMP; and
- Obtaining any environmental permits which are required for the design, construction and operation of the development.

2.9.4. Authorities – Walvisbay Municipality

Provide authorization for the proposed activities by

- Issuing Consents for the ECC application
- Approve Building Plan and site layout
- Issue Fitness Certification in terms of the Local Authorities Act of 1190
- Conduct monitoring during site establishment and operation phase



- Ensure the operation of the activities are within the Walvis Bay Town Planning Scheme No.35
- Notify the proponent of any changes to land uses thereof and address dispute that may arise between the proponent (occupier) and adjacent properties owners.



3. RELEVANT LEGISLATIVE, POLICIES, AND REGULATORY FRAMEWORK GOVERNING ENVIRONMENTAL MANAGEMENT IN NAMIBIA

3.1 Introduction

There is a growing concern in Namibia and at global level that many forms of development activities cause damage to the environment. Development activities have the potential to damage the natural resources upon which the economies are based. A major national challenge today is how to maintain sustainable development without damaging the environment. The Environmental Impact Assessment is a useful tool for protection of the environment from the negative effects of developmental activities. It is now accepted that development projects must be economically viable, socially acceptable and environmentally sound. It is a condition of the Namibia Government to conduct Environmental Impact Assessment on the development Projects.

The Table 1 below summarizes the legislation and policy guidelines that are relevant to the proposed project and is not exhaustive.

Title of	Implications for proposed project (Please read all Acts with
legislation,	their Regulations)
policy or	
guideline	
International Reg	julations
Guidelines on	The Guidelines on occupational safety and health Management
occupational	systems ILO-OSH 200, sets the international Occupational health
safety and health	and safety standard that guide and contribute to the protection of
management	workers from hazards and to the elimination of work-related injuries,
systems ILO-	ill health, diseases, incidents and deaths.
OSH 2001	

Table 1: Legal Frameworks



ISO 14001 of	ISO 14001 is the international standard that specifies requirements
2015	for an effective environmental management system (EMS). It
	provides a framework that an organization can follow, rather than
	establishing environmental performance requirements. This is
	relevant to GAC because it sets the best standards environmental
	management, that includes waste management, pollution and other
	environmental practices that may pose environmental, health and
	safety risks to the biodiversity, community, staff and stakeholders.
	GAC shall ensure that its operations are in compliance and meets
	the best practices and standards that are outlined in this document.
ISO 45001 of	ISO 45001:2018 specifies requirements for an occupational health
2018	and safety (OH&S) management system, and gives guidance for its
	use, to enable organizations to provide safe and healthy workplaces
	by preventing work-related injury and ill health, as well as
	proactively improving its OH&S performance. Regarding the
	proposed project, the GAC shall ensure that its operations are in
	compliance with the international health and safety standards
	together with the provisions of the national legal frameworks.
National Regulate	ory frameworks
The Namibian	Article 95(I) of Namibian Constitution is the focal point for the
Constitution of	protection of Namibia's environment. It declares that the
1990	Government will take steps to maintain Namibia's ecosystems,
	essential ecological processes and biological diversity. It also says
	that the Government will try to make sure that all of the nation's
	living natural resources are used on a sustainable basis for the
	benefit of all Namibians, both present and future generations.
	In addition, Chapter 3 Article 6 of the Namibian Constitution clearly
	indicate that "The right to life shall be respected and protected"
	This may include the protection of employees' lives from
	occupational risks and hazards that may lead to deaths.



Environmental	The Act provides a list of projects requiring an Environmental
Management	Assessment. It aims to promote the sustainable management of the
Act No. 7 of	environment and the use of natural resources and to provide for a
2007	process of assessment and control of activities, which may have
	significant effects on the environment.
Environmental	This regulation lists all activities that requires an Environmental
Management	Clearance Certificate and provide Environmental Impact
Regulations	Assessment Regulations
Government	
Notice No. 28-30	
of 2012	
National Waste	This policy is focusing specifically on Waste Management and use
Management	of various technologies waste treatment and disposal to minimize
Policy,	health risks. It is also geared to have a unified waste management
2010	system countrywide. This policy provides the necessary guidance
	on the processes related to waste management in the MOHSS,
	wider Namibia health and social welfare sectors, and other relevant
	stakeholders. It is taking into consideration the process of
	integrated waste management from generation to final disposal.
	This practice also focuses on medical, household, mining,
	agricultural, and construction waste.
Pollution Control	The Bill promote sustainable development and the establishment of
and Waste	the Pollution Control and Waste Management Unit; to prevent and
Management	regulate the discharge of pollutants to the air, water and land; to
Bill of 1999	make provision for the establishment of an appropriate framework
	for integrated pollution prevention and control; to regulate noise,
	dust and odor pollution; to establish a system of waste planning and
	management; and to enable Namibia to comply with its obligations
	under international law in this regard.
Pollution Control	This Bill serves to regulate and prevent the discharge of pollutants
and Waste	to air and water as well as providing for general waste



•			
10	vocto	aonte	
	vesili	lenis	

Management Bill,	management. The bill provide framework for a multitude
2003	administration on pollution control and waste management in the
	country. Each authority identified by the bill shall play its respective
	roles.
Water Resources	This Act provides provision for the control, conservation and use of
Management Act	water for domestic, agricultural, urban and industrial purposes. In
2004	addition, the Act clearly gives provision that pertain with license or
	permit that required abstracting and using water as well as for
	discharge of effluent.
Hazardous	The Ordinance applies to the manufacture, sale, use, disposal and
Substances	dumping of hazardous substances, as well as their import and
Ordinance No.	export. Its primary purpose is to prevent hazardous substances
14 of 1974	from causing injury, ill-health or the death of human beings.
	Hydrocarbons handled during the construction phase may be
	hazardous thus careful handling and management is vital to prevent
	spills, explosions, ill boolth or dooth
	spills, explosions, ill-health of death.
Labour Act No.	Consolidate and amend the labour law; to establish a
Labour Act No. (11 of 2007) and	Consolidate and amend the labour law; to establish a comprehensive labour law for all employers and employees; to
Labour Act No. (11 of 2007) and Regulations No.	Consolidate and amend the labour law; to establish a comprehensive labour law for all employers and employees; to entrench fundamental labour rights and protections; to regulate
Labour Act No. (11 of 2007) and Regulations No. 156 Relating to	Consolidate and amend the labour law; to establish a comprehensive labour law for all employers and employees; to entrench fundamental labour rights and protections; to regulate basic terms and conditions of employment; to ensure the health,
Labour Act No. (11 of 2007) and Regulations No. 156 Relating to the Health and	Consolidate and amend the labour law; to establish a comprehensive labour law for all employers and employees; to entrench fundamental labour rights and protections; to regulate basic terms and conditions of employment; to ensure the health, safety and welfare of employees; to protect employees from unfair
Labour Act No. (11 of 2007) and Regulations No. 156 Relating to the Health and Safety	Consolidate and amend the labour law; to establish a comprehensive labour law for all employers and employees; to entrench fundamental labour rights and protections; to regulate basic terms and conditions of employment; to ensure the health, safety and welfare of employees; to protect employees from unfair labour practices and to provide for incidental matters.
Labour Act No. (11 of 2007) and Regulations No. 156 Relating to the Health and Safety National	Consolidate and amend the labour law; to establish a comprehensive labour law for all employers and employees; to entrench fundamental labour rights and protections; to regulate basic terms and conditions of employment; to ensure the health, safety and welfare of employees; to protect employees from unfair labour practices and to provide for incidental matters. This policy strengthens Chapter 4 of the Labour Act, 2007 (Act No.
Labour Act No. (11 of 2007) and Regulations No. 156 Relating to the Health and Safety National Occupational	Consolidate and amend the labour law; to establish a comprehensive labour law for all employers and employees; to entrench fundamental labour rights and protections; to regulate basic terms and conditions of employment; to ensure the health, safety and welfare of employees; to protect employees from unfair labour practices and to provide for incidental matters. This policy strengthens Chapter 4 of the Labour Act, 2007 (Act No. 11 of 2007) that places legal duty upon employers to provide a
Labour Act No. (11 of 2007) and Regulations No. 156 Relating to the Health and Safety National Occupational Safety & Health	Consolidate and amend the labour law; to establish a comprehensive labour law for all employers and employees; to entrench fundamental labour rights and protections; to regulate basic terms and conditions of employment; to ensure the health, safety and welfare of employees; to protect employees from unfair labour practices and to provide for incidental matters. This policy strengthens Chapter 4 of the Labour Act, 2007 (Act No. 11 of 2007) that places legal duty upon employers to provide a healthy and safe working environment for the workers and any other
Labour Act No. (11 of 2007) and Regulations No. 156 Relating to the Health and Safety National Occupational Safety & Health Policy of 2021	Consolidate and amend the labour law; to establish a comprehensive labour law for all employers and employees; to entrench fundamental labour rights and protections; to regulate basic terms and conditions of employment; to ensure the health, safety and welfare of employees; to protect employees from unfair labour practices and to provide for incidental matters. This policy strengthens Chapter 4 of the Labour Act, 2007 (Act No. 11 of 2007) that places legal duty upon employers to provide a healthy and safe working environment for the workers and any other person who might be affected by their operations.
Labour Act No. (11 of 2007) and Regulations No. 156 Relating to the Health and Safety National Occupational Safety & Health Policy of 2021 National Policy	Consolidate and amend the labour law; to establish a comprehensive labour law for all employers and employees; to entrench fundamental labour rights and protections; to regulate basic terms and conditions of employment; to ensure the health, safety and welfare of employees; to protect employees from unfair labour practices and to provide for incidental matters. This policy strengthens Chapter 4 of the Labour Act, 2007 (Act No. 11 of 2007) that places legal duty upon employers to provide a healthy and safe working environment for the workers and any other person who might be affected by their operations.
Labour Act No. (11 of 2007) and Regulations No. 156 Relating to the Health and Safety National Occupational Safety & Health Policy of 2021 National Policy on Climate	Consolidate and amend the labour law; to establish a comprehensive labour law for all employers and employees; to entrench fundamental labour rights and protections; to regulate basic terms and conditions of employment; to ensure the health, safety and welfare of employees; to protect employees from unfair labour practices and to provide for incidental matters. This policy strengthens Chapter 4 of the Labour Act, 2007 (Act No. 11 of 2007) that places legal duty upon employers to provide a healthy and safe working environment for the workers and any other person who might be affected by their operations. In harmony with the findings of the Intergovernmental Panel on Climate Change (IPCC) over time and the Earth Summits being
Labour Act No. (11 of 2007) and Regulations No. 156 Relating to the Health and Safety National Occupational Safety & Health Policy of 2021 National Policy on Climate Change for	Consolidate and amend the labour law; to establish a comprehensive labour law for all employers and employees; to entrench fundamental labour rights and protections; to regulate basic terms and conditions of employment; to ensure the health, safety and welfare of employees; to protect employees from unfair labour practices and to provide for incidental matters. This policy strengthens Chapter 4 of the Labour Act, 2007 (Act No. 11 of 2007) that places legal duty upon employers to provide a healthy and safe working environment for the workers and any other person who might be affected by their operations. In harmony with the findings of the Intergovernmental Panel on Climate Change (IPCC) over time and the Earth Summits being held annually the policy seeks to outline a coherent, transparent



Public and	This Act makes provision for the prevention and control of infectious
Environmental	diseases, venereal diseases and epidemics. It also regulates
Health Act 1 of	sanitation, food and public water supplies. In relation to this
2015	assignment, there are aspects of occupational health and safety,
	for example, ventilation that may pose health risk and spread of
	communicable diseases.
Local Authorities	Provide for the determination, for purposes of local government, of
Act, No. 23 of	local authority councils; the establishment of such local authority
1992 as	councils; and to define the powers, duties and functions of local
amended	authority councils; and to provide for incidental matters.
Petroleum	Regulates petroleum industry
Products and	 Makes provision for impact assessment
Energy Act	• Controls the safe disposal of petroleum products, including the
Act No. 13 of	collection and discarding of used oil
1990,	Petroleum Products Regulations (Government
Government	Notice No. 155 of 2000) o Prescribes South African National
Notice No. 45 of	Standards (SANS) or equivalents for construction, operation and
1990	decommissioning of petroleum facilities (refer to Government
	Notice No. 21 of 2002
Petroleum	Regulations relating to the purchase, sale, supply, acquisition,
Products	possession, disposal, storage, transportation, recovery and re-
and	refinement of used mineral oil.
Energy	
Act	
Regulations	
Government	
Notice No. 112 of	
1991	
Petroleum	All regulations with regard to used mineral oils
Products and	
Energy Act, 1990	


(act 13 of 1990):	• Provides for permits and certificates for various aspects of
Regulations	possession and handling of mineral oils.
relating to the	
purchase, sale,	
supply,	
acquisition,	
possession,	
disposal,	
storage,	
transportation,	
recovery and re-	
refinement of	
used mineral oil	
Government	
Notice No. 48 of	
1991	
Walvisbay Munic	ipality bylaws
Integrated Urban	The overall vision to transform Walvis Bay to being the primary
Spatial	industrial city in Namibia. It aims to ensure that appropriate levels
Development	of environmental management are enforced for all developments in
Framework for	Walvis Bay
Walvis Bay	
Integrated	Indicates the directions that the Municipality of Walvis Bay will move
Environmental	towards in the forthcoming years to fulfil its responsibilities to
Policy of Walvis	manage the environment of Walvis Bay together with the town's
Bay (Agenda 21	residents and institutions
Project)	



4. CONSULTATION AND PUBLIC PARTICIPATION

4.1. Introduction

Consultation with the public forms an integral component of an environmental assessment investigation and enables Interested and Affected Parties (IAPs) e.g. neighbouring landowners, local authorities, environmental groups, civic associations and communities, to comment on the potential environmental impacts associated with the facility and to identify additional issues which they feel should be addressed in the environmental assessment.

This chapter outlines the public consultation process and key issues/concerns raised during the public consultations exercise. The proposed mitigation measures suggested by the public and other stakeholders that the proponent should incorporate to minimize environmental degradation and promote good working relationship with the community has been integrated in this chapter.

The specific objectives of the neighbors or community public participation process are to:

- Inform the local community about the project and thereby minimize conflicts and delays on implementation.
- To gain the views, concerns and values of the local community.
- To initiate public involvement processes, in a bid to induce and cultivate a sense of peoples" belongingness to the project.
- To suggest and facilitate the people's roles in the project's sustainability, in terms of management, maintenance and productivity.
- To take into account public inputs in decision making regarding the proposed project.
- To gain local knowledge.



4.1.1. Objectives of Public Participation

The main objectives of public participation were to:

- Provide clear and accurate information about the project to the beneficiaries.
- Obtain the main concerns and perceptions of the community and their representatives regarding the project.
- Obtain options and suggestions directly from the affected communities on their preferred mitigation measures.
- Identify local leaders and relevant stakeholders with whom further dialogue can be continued in subsequent stages of the project.

4.2. Overview and approach

The following tasks have been undertaken during public consultation process, which started November 2023.

4.2.1. Identification of Interested and Affected Parties (I&AP's)

After the scoping process, the EIA team identified I&AP's and key stakeholders of the proposed project. The public participation activities to be undertaken for this EIA process were incorporated into the overall approach of the EIA background information. Among key stakeholders identified were Municipality of Walvisbay, neighboring land owners and businesses, line ministries, civic associations and communities. Other I&AP's could register to the EIA team and a special database created capturing all their names and correspondence details.

4.2.2. Distribution of BID

A Background Information Document (BID) was distributed to I & A Parties and it was distributed to key stakeholders identified during the scoping process. The Background



Information Document (BID) provided a description summary of the proposed project, and the project proponent and the whole procedure of the EIA to be followed.

4.2.3. Public Announcement

An extensive public announcement was done to make sure the public is aware of proposed development. The EIA study was announced publicly through the following means:

Table 2: Details on public notifications and engagement of the EIA study

Date	Activity		
01/12/2023	Newspaper advert in the Namib Times, the local and widely read		
	newspaper in Walvisbay/Erongo region		
03/12/2023	Door to door visit to the neighboring businesses notifying them of the		
	proposed project and inviting them to the public consultation meeting. In		
	the process, email addresses of the key personnel officers/responsible		
	personnel were collected.		
03/12/2023	Notice on the proposed project and invitation to public participation		
	meeting was elected on the site.		
04/12/2023	Background Information Document (BID) and questionnaire was		
	distributed through emails to the identified I & APs. The emails also		
	served as an invitation to the public consultation meeting.		
08/12/2023	Newspaper advert in the Namib Times, the local and widely read		
	newspaper in Walvisbay/Erongo region		
14/12/2023	Public Consultation Meeting at the Walvisbay Municipality Library Town		
	Hall.		
21/12/2023	Stakeholder engagement meeting with the Walvisbay Municipality		
	officials.		
24/01/224	Progress meeting with the Walvisbay Municipality officials		



4.3. Issues Raised on Public Consultation Meeting (14 December 2023).

4.3.1. Employment Opportunities

The persons who attended the public consultation meeting were positive that during the development and operation of the proposed project, numerous employment opportunities will be created for the local residents especially during the construction and installation works. During the meeting it was suggested that the proponent should consider the youth and women in the area for the available casual jobs.

4.3.2. Contribution to the economy

The participants accepted the Waste oil management plant as a great initiative that contributes to the government's efforts to industrialize Namibia as well contribute to the country's GDP and revenue to the local authority.

4.3.3. Effective waste oil management

The participants acknowledged that waste oil if not well disposed and managed it will cause great damage to the environment that includes underground water, soil, air quality and the marine resources. Hence, the waste oil management plant offers an effective way to manage waste oil disposal by recycling it, hence reducing the damages to the environment. The project also helps the industry, for example the vessel and cruise ships to dispose their used oil to GAC Investments for recycling hence keeping the marine waters clean.

4.3.4. Dust and Fume Emissions

There were concerns raised by some participants over the possibility of generation of large amount of dust and fumes within the project site and surrounding areas as a result of construction work. The proponent shall require of the contractor to put in place measures to reduce dust levels at the site to a minimum as much as possible.

4.3.5. Noise Pollution

There were concerns of possibility of noise pollution interfering with activities of adjacent neighbors which may be caused by the plant during the oil segregation process as well caused by trucks loading and offloading used oil. The proponent shall require of the



contractor to put in place adequate measures to curb noise pollution to avoid interrupting activities in existing adjacent buildings.

4.3.6. Safety and Security

Those interviewed suggested that the proponent should ensure the contractor provides and maintains safety and security around the site during the construction works. Measures should also be put in place to reduce the possibilities of accidents and disruption of traffic caused by trucks to the plant. The workers involved in the project should also be provided with appropriate personal protective equipment when at work to ensure their safety.

4.3.7. Waste Management

Some of the consulted people were concerned about the unsightly scenarios associated with construction sites due to the presence of wastes including empty cement bags, rejected metals, wrappings (plastic bags), and broken glass. Suggestions were made to the proponent to ensure the contractor manages all the wastes resulting from the project in an environmentally accepted manner.

4.3.8. Optimal Land Use

During the meeting it was indicated that the proposed project will result in optimal land use since the location is in the industrial area and there was no building erected. All of the participants approved the proposed project.

4.4. Issues raised on the Consultation meeting with the Walvisbay Municipality

The following issues were raised during our meeting with the Walvisbay Municipality officials:



The issue of removal efficiency during the oil and water separation was raised. The proponent assured that the oil-water segregation process is 95% efficient and only 5 parts per million will be allowed to pass the wash bay.

4.4.2. Wash bay

Regarding the wash bays, issues regarding the wash bay centered on the measurements and materials that will be used to build the wash bays. The wash bays shall be built according to the international and national standards as stipulated by the architectures.

4.4.3. Effluent discharge

The municipal team was also concerned on how the waste water from the oil processing will be discharged. They recommended that the proponent should work and seek advice from the department of water and sanitation regarding the effluent discharge. The proponent assured that the water will be clean for reuse in other sectors such as construction or gardening. However, the company emphasised that they will work with the municipality to test the water for safety and on the best way of disposal which is not detrimental to the environment.

4.4.4. Traffic

Traffic concerns from the collection to dispatch points were raised during the meetings. The municipal team indicated that the municipality is working on regulating traffic in town in particular routes for heavy trucks. Hence, they requested the proponent to indicate the routes that they will use to indicate the routes that they will use and submit to the municipality's traffic department for further directions.



4.4.5. Oil spillage

During the meeting, it was raised that there is a possibility of oil spillage during collection, storage and delivery process. The municipal team recommended to have Emergency Response Plan (ERP) and Standard Operating Procedures (SOP) in place, specifically for the proposed project.

4.4.6. Health and safety

Emphasis was also put on ensuring the health and safety of employees and stakeholders during the construction and operational phases.

4.4.7. Business and investment opportunities

During the municipal meeting it was indicated that the proposed project presents business and investment opportunities to the harbor town. The municipality pledged to support business investments within their business jurisdiction.

4.5. Issues raised by the neighboring land owners

Consultation was done with the neighboring businesses through a questionnaire survey that was sent through emails. Only one business (Namib Mills located at ERF 3740) through the land owner, initially objected the proposed project. They raised concerns of waste oil entering and blocking the sewage system. The consultant clarified this concern highlighting that the previous presence of oil in the sewage was not as a result of GAC operations since the project is not yet executed waiting for approval from the responsible authorities. The landowner for ERF 3740 finally gave consent on condition that the municipality of Walvisbay has given the proponent to proceed with the project. (See attached email communication).



5. ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED PROJECT

5.1. Introduction

This section identifies both positive and negative impacts associated with the proposed Waste oil management plant project. These impacts are hereby identified in two distinct phases of the project i.e. Construction Phase and Operation Phase. Another study is expected to be carried out during the projects decommissioning phase. Scoring or weighing of the magnitude of the impacts was undertaken and results are outlined in this draft report.

Кеу	Type of impact	Key	Type of impact.
++	Major positive impact.	+	Minor positive impact.
	Major negative impact	-	Minor negative impact.
0	Negligible/zero impact	NC	No change
SP	Specific/localized	W	Widespread.
R	Reversible	IR	Irreversible.
SH	Short term.	L	Long term.
т	Temporary	Ρ	Permanent



5.2. Construction or machinery installation phase

This phase shall begin with the site preparations for construction works to take place. Construction Impacts have the potential to create nuisance for business neighbors, however these could be managed in an acceptable limit. In addition, the construction impacts are also temporary in nature.

5.2.1. Positive Impacts

5.2.1.1. Employment Opportunities (++/SH/T)

Both direct and indirect forms of employment shall arise from the project initiation. Direct employment will be mainly through skilled and unskilled laborers whose workforce shall be needed to build the proposed project. Employment opportunities will be a benefit both in economic and social sense. In the economic sense it means abundant unskilled labor will be used in economic production. In the social sense the young and energetic otherwise poor people from the surrounding areas will be engaged in productive employment other than remaining idle. Several workers including casual laborers, structural engineers, masons, carpenters, electricians, and plumbers are expected to work on the site for a period that the construction will start to the end.

5.2.1.2. Local and National Economic Gains(+/L)

Both the local and national economy shall gain much from the project in that materials for building shall be sourced locally within the country and that all the materials are charged VAT hence increasing revenue collection in the country.

5.2.1.3. Provision of Market for Supply of Building Materials(++/SH/T)

The project will require supply of large quantities of building materials most of which will be sourced locally within the vicinity of the project and the surrounding areas. This provides ready market for building material suppliers such as brick making companies, hardware shops and individuals with such materials.



5.2.1.4. Informal Business Growth (+/SH)

During construction period, the informal sector will benefit from the operations. This will involve informal food businesses that will emerge as most of the workers who will be working on the proposed project site will be buying food from the informal business owners who shall be operating in the vicinity.

5.2.2. Negative Impacts

5.2.2.1. Solid Waste Generation (-/SH)

During construction of the proposed project, a lot of solid waste will be generated. These include papers used for packing cement, Plastics metal and timber remains among others. Dumping around the site will interfere with the aesthetic status of the area. This has a direct effect to the surrounding community. Disposal of the same solid wastes off-site could also be a social inconvenience if done in the wrong places. The off-site effects could be aesthetic, pest breeding, pollution of physical environment, invasion of scavengers and informal recycling communities.

Mitigation

- The contractor or proponent should work hand in hand to facilitate waste handling and disposal from the site.
- All waste resulting from construction works, land reclamation, or any other activity should be collected and disposed of appropriately such as in a sanitary landfill or an alternative municipal/government-permitted disposal site.
- The waste materials should be properly segregated and separated to encourage recycling of some of them with the approval of the site engineer.
- Uncontrolled littering in the facility and surrounding areas should be prevented



5.2.2.2. Air Pollution (-/SH)

The construction activities on the site will result to increased dust and gas emissions. Such dust and gases have direct negative impact to the quality of air and hence animal/human health.

Mitigation measures

- Employees must be provided with suitable masks in areas with high levels of dust or fumes.
- When it comes to dust-related complaints, complaints register ought to be maintained, along with any appropriate mitigating measures (such dust suppression) to resolve the concerns.
- Watering all active construction areas as and when necessary to lay dust
- Cover all trucks hauling soil, sand and other loose materials or require all trucks to maintain at least two feet of freeboard.
- Apply water when necessary, or apply (non-toxic) soil stabilizers on all unpaved access road, parking areas and staging areas at construction sites.
- Sweep regularly (with physical sweepers) the parking area and staging areas at the project sites.
- All construction machinery shall be marinated and serviced in accordance with the contractors" specifications.
- Dust generating activities like excavation, handling and transportation of soil will be avoided during strong winds.
- The Labour Act of 2007 Regulation pertaining to the health and safety of employees at work shall be followed by all emissions releases.
- Perform a recurring health assessment among the employees and collaborate with adjacent medical establishments to perform passive monitoring of the surrounding populace for illnesses associated with these emissions



5.2.2.3. Noise pollution (-/SH)

The construction and mechanical installation works will most likely be a noisy operation due to the moving machines (mixers, tippers, hand held machines, communicating workers) and incoming vehicles to deliver materials and workers to site. However, the site workers are likely to be affected since noise beyond some level is itself a nuisance and need to be avoided. Noise created shall be a nuisance to the neighboring community mainly immediate neighbors, though at a lesser scale.

Mitigation measures

- To avoid hearing impairment and nuisances, adhere to the Labour Act's Health and Safety Regulations (2007) and/or the World Health Organization's (Guidelines for Community Noise, 1999), which set maximum noise levels.
- For maximum noise reduction, every machinery has to have routine maintenance performed.
- Provide hearing protectors as standard personal protective equipment (PPE) for workers in noisy environments.

5.2.2.4. Occupational Health and Safety (OHS) (- -/SH)

During construction, there will be increased dust, noise and air pollution. The immediate neighbours and workforce involved would be more subjected to these environmental hazards. Food for the construction workforce is usually provided by mobile individuals who usually operate without licenses. This can compromise health of the workers especially if foodstuffs are prepared in unhygienic conditions.

- Comply with all Health and Safety standards specified in the Labour Act.
- Train workers how to use the equipment safely and effectively
- Training on occupational health and safety.
- Safety talks to be done every day before the commencement of work.
- Emergency response plans should be present.



- Safety officer to be stationed at the site.
- Formulation of a safety health and environment workers committee.
- A fully stocked first aid kit should permanently be available on site as well as an adequately trained staff member in a position to administer first aid.
- All workers should have access to the appropriate Personal Protective Equipment (helmets, gloves, respirators, work suits, earplugs, safety goggles, and safety shoes where applicable).
- Proper ablution facility should be used and clearly marked for males and females.
- Use dust suppression measures.
- Maintain good housekeeping.
- Reduce noise exposure by isolating noisy equipment and rotate tasks.
- Conduct Hazard identification and risk assessments.
- Any leakage/spillage shall be immediately attended and provision of urgent cleaning.
- Work area should be monitored to maintain work environment free from any hazards.
- Provisions of immediate accident/incident reporting and investigation.
- Safety posters and signages should be exhibited at conspicuous places.

5.2.2.5. Increased Water Demand (-/SH)

Both the workers and the construction works will create additional demand for water in addition to the existing demand. Water will be mostly used in the creation of aggregates for construction works and for wetting surfaces for softening or hardening after creating the formworks.

• Promptly detect and repair of water pipe and tank leaks



- Staff to conserve water e.g., by avoiding unnecessary toilet flushing.
- Ensure taps are not running when not in use

5.3. Operation phase

5.3.1. Positive Impacts

5.3.1.1. Employment Generation

Employment opportunities are one of the long-term major impacts on the proposed project that will be realized after construction and during the operation and maintenance of the project. These will involve security personnel, administration, operational personnel and truck drivers will be transporting the used oil.

5.3.1.2. Increase in Revenue

There will be positive gain for the revenue system arising from the processing of the building plans to the proposed building to the local council; this is in addition to the annual rates to be paid to the council. The proposed project will also generate income to the owner through the sales from the reprocessed final products of used oil.

5.3.1.3. Contribution to the national economy

Economically speaking, the investment will contribute towards economic growth adding on the national Growth Domestic Product. It also supports the government's effort for climate change through proper oil waste management, hence reducing pollution of the environment.

5.3.1.4. Optimal Land use

To develop under-used land for this kind of project that complements economic activities hence making use of land space to improve the economy and provide more business premises.



5.3.2. Negative Impacts

The proposed project development will cause significant disturbances within the area which shall be kept at controllable levels.

5.3.2.1. Effluent discharge (-/L/R)

The oil-water separation process uses large quantities of water to process the used oil. The water will be discharge to a water storage tank where the water will be recycled to the oil segregation plant. However, excess water from the plant should be disposed and there is a probability that the water may contain oil particles that may contaminate the soil.

Mitigation measures

- Ensure that no water from the waste oil plant will be discharged to the municipal drainage or disposed to the ground.
- The water can be reused in sectors such as construction after testing according to the municipal procedures.
- Monitor effluent quality regularly to ensure that the stipulated discharge rules and standards are not violated.

5.3.2.2. Oil spillage (- / L/R)

There are minimal chances of oil spillage during bunkering, transportation, offloading and onsite storage. This may contaminate the soil and environment.

Mitigation measures

- Maintain a Spill Response Plan and keep it current.
- Contain and cover all solid and liquid wastes.
- Ensure absorbent materials and other spill response equipment are maintained in accordance with local regulations and procedures for containment and clean-up of different spills, and that they are easily accessible from anywhere in the facility.



• Spot clean leaks and drips routinely.

Collection and Storage

- Use of 2" Oil Suction and Delivery Hoses Type T605 during bunkering and offloading at the collection points and plant
- Use of impermeable tanks for storage
- Construction of bund walls for secondary containment

Spill Clean-up

- Stop spills at the source.
- Prevent wash water from spill clean-up from flowing to a gutter or a storm/sewer drain.
- Use granular absorbents (e.g., cat litter) to absorb spills.
- Promptly inform the Local Authority of major spills.

5.3.2.3. Traffic (- / L/R)

The Proposed project will have a potential of increasing pressure on existing infrastructure such as road, with many trucks and vehicles plying the access road to deliver materials and equipment.

In addition, traffic to and from the location may increase in Hidipo Hamutenya street, which raises the possibility of mishaps and accidents as well as unauthorized traffic on nearby properties. This is particularly true when it comes to the transportation of waste oils and recycled goods. Because large motor vehicles are used by several enterprises to provide goods and/or services to nearby premises, the impact is cumulative in nature.

Mitigation measures

• The effects of traffic will be lessened by the placement of warning and directional signage.



5.3.2.4. Health and safety (+ /L)

Every activity involved with the construction and operational phase is reliant on human labour and consequently exposes them to health and safety concerns. The primary dangers to personnel are associated with tasks like operating machinery and handling hazardous chemicals (inhalation and the carcinogenic effect of some petroleum products). Theft, sabotage, and unlawful entrance are all considered security hazards.

- Comply with all Health and Safety standards specified in the Labour Act.
- Train workers how to use the equipment safely and effectively
- Training on occupational health and safety.
- Safety talks to be done every day before the commencement of work.
- Emergency response plans should be present.
- Safety officer to be stationed at the site.
- Formulation of a safety health and environment workers committee.
- A fully stocked first aid kit should permanently be available on site as well as an adequately trained staff member in a position to administer first aid.
- All workers should have access to the appropriate Personal Protective Equipment (helmets, gloves, respirators, work suits, earplugs, safety goggles, and safety shoes where applicable).
- Proper ablution facility should be used and clearly marked for males and females.
- Use dust suppression measures.
- Maintain good housekeeping.
- Reduce noise exposure by isolating noisy equipment and rotate tasks.
- Conduct Hazard identification and risk assessments.
- Any leakage/spillage shall be immediately attended and provision of urgent cleaning.



- Work area should be monitored to maintain work environment free from any hazards.
- Provisions of immediate accident/incident reporting and investigation.
- Safety posters and signages should be exhibited at conspicuous places.

5.3.2.5. Fire (+/L)

Fire danger may rise as a result of building and operational activities. Given that the land is adjacent to Namib Mills a food storage and distribution company, battling flames is more difficult and riskier. There is on-site storage for flammable materials. There is a considerable increase in fire danger associated with these items due to the heating of waste oil and LFO burning. It's possible that after extended use, waste oil was combined with fuel, which diluted the oil. Other oils may lose their flash point due to the introduction of other materials like gasoline or water, which raises the possibility of a fire. When the permits needed for the management and storage of spent oil are not obtained, the risks to firefighters rise.

Mitigation measures

- Sufficient water should be made available on site for firefighting purposes.
- Ensure that all fire-fighting devices are in good working order.
- Regular inspections and services should be carried out to inspect and test firefighting equipment.
- All fire precautions and fire control at the waste oil storage plant must be in accordance with SANS 10089-1:1999, or better.
- Signs for no smoking and mobiles, should be displayed on site.
- All fire precautions and fire control at the plant must be in accordance with SANS 10089-1:2008, or better.



- Ensure that all hazardous materials are stored in accordance with MSDS, SANS, and permit requirements.
- Keep tanks away from heat sources and other ignition sources.
- Make sure heating coils are always covered with product at least 15 centimeters should be and bond all equipment to prevent electrostatic charges during pumping.
- Maintain routine site, mechanical, and electrical inspections and maintenance.
- Clean up any spills or leaks.
- Take particular note of the pertinent regulations outlined in sections 47 and 48 of the Petroleum Products and Energy Act, 1990 (Act No. 13 of 1990).
- Maintaining a comprehensive fire protection and prevention plan that includes an emergency response plan, firefighting plan, and spill recovery plan is necessary.
- It is also important to maintain firefighting equipment, good housekeeping, and personnel training (firefighting, fire prevention, and responsible housekeeping practices).
- All of these requirements are outlined in the SANS standards for operation and maintenance of the facility, which are in line with the requirements of the pert for refining used mineral oil, storage, and handling.

5.4. Decommissioning Phase

5.4.1. Positive Impacts

5.4.1.1. Rehabilitation (+/T)

Upon decommissioning of the proposed project development, rehabilitation of the project site will be carried out to restore the site to its original status. This will include replacement of topsoil which will lead to improved visual quality of the project area. In the event of expansion of the project at another site, then an EIA will be carried out again.



5.4.1.2. Employment Opportunities (+/T)

Since the demolition exercise will utilize human resource manpower, employment opportunities shall therefore be created.

5.4.2. Negative Impacts

5.4.2.1. Solid Waste (- -/SH)

Demolition of the related infrastructure will result in the accumulation of huge amounts of solid waste. This consists of materials used in construction including concrete, metal, drywall, wood, glass, paints, adhesives, sealants and fasteners. Large quantities of such waste may lead to release of certain hazardous chemicals into the environment. In addition, even the generally nontoxic chemicals such as chloride, sodium, sulphate and ammonia which may be released as a result of leaching of demolition waste, are known to lead to degradation of groundwater quality.

- The contractor or proponent should work hand in hand to facilitate waste handling and disposal from the site.
- All waste resulting from construction works, land reclamation, or any other activity should be collected and disposed of appropriately such as in a sanitary landfill or an alternative municipal/government-permitted disposal site.
- The waste materials should be properly segregated and separated to encourage recycling of some of them with the approval of the site engineer.
- Uncontrolled littering in the facility and surrounding areas should be prevented

In addition, solid waste resulting from demolition waste be recycled or reused to ensure that materials that would otherwise be disposed off as waste are diverted for productive uses. In this regard, the project proponent is committed to ensuring that demolition materials at the end of decommissioning phase will be used in other projects rather than being disposed off. In addition, demolition materials including cabinets, doors, plumbing and lighting fixtures, marbles glass and other steel machine parts will be recovered for refurbishing and use in other projects. Such measures will involve the sale or donation of



such recyclable/reusable materials to construction companies and sold to scrap metal dealers, local community groups, institutions and individual residents or homeowners. It is further recommended that the project proponent should consider the use of recycled or refurbished demolition materials. Purchasing and using once-used or recovered demolition materials will lead to financial savings and reduction of the amount of demolition debris disposed of as waste.

5.4.2.2. Dust emission (- - /SH/T)

Large quantities of dust will be generated during demolition works. This will affect demolition staff as well as the neighboring businesses.

- Employees must be provided with suitable masks in areas with high levels of dust or fumes.
- When it comes to dust-related complaints, complaints register ought to be maintained, along with any appropriate mitigating measures (such dust suppression) to resolve the concerns.
- Watering all active construction areas as and when necessary to lay dust
- Cover all trucks hauling soil, sand and other loose materials or require all trucks to maintain at least two feet of freeboard.
- Apply water when necessary, or apply (non-toxic) soil stabilizers on all unpaved access road, parking areas and staging areas at construction sites.
- Sweep regularly (with physical sweepers) the parking area and staging areas at the project sites.
- All construction machinery shall be marinated and serviced in accordance with the contractors" specifications.
- Dust generating activities like demolition, handling and transportation of soil will be avoided during strong winds.
- The Labour Act of 2007 Regulation pertaining to the health and safety of employees at work shall be followed by all emissions releases

5.4.2.3. Noise and Vibration (- - /SH/T)

The demolition works will lead to significant deterioration of the acoustic environment within the project site and the surrounding areas.

Mitigation measures



- To avoid hearing impairment and nuisances, adhere to the Labour Act's Health and Safety Regulations (2007) and/or the World Health Organization's (Guidelines for Community Noise, 1999), which set maximum noise levels.
- For maximum noise reduction, every machinery has to have routine maintenance performed.
- Provide hearing protectors as standard personal protective equipment (PPE) for workers in noisy environments.



6.1. Introduction

This section analyses the project alternatives in terms of site, size, suitability, functions, energy sources site logistics, operational logistics, technological logistics, and social economic considerations.

6.2. No Project Alternative

The no project alternative option in respect to the proposed project implies that the status quo is maintained; this option is the most suitable alternative from the extreme environmental perspective as it ensures non-interference with the existing conditions. Under no project alternative, the proponent's proposal would not receive the necessary approval from MEFT proposed project would not be constructed and there would be no demand for the development. This option will however, involve several losses both to the land owner and the community as a whole. The No project option is the least preferred from the socio-economic and partly environmental perspective due to the following factors.

- Discouragement for investors
- Land will remain less utilized.
- No employment opportunities will be created for Namibians bearing in mind the proposed project is estimated to take at least one year before completion.
- Local skills would remain underutilized.

6.3. Analysis of Site Alternative Construction Materials and Technology

The proposed project will be constructed using modern, locally and internationally accepted materials to achieve public, health safety, security and environmental aesthetic requirements. Equipment that save energy and water will be given first priority without



compromising on cost or availability factors. Heavy use of timber during construction is discouraged because of massive destruction of forests.

6.4. Domestic Waste Water Management Alternatives

The proponent shall connect all his waste water to the waste water treatment plant system which will be designed to accommodate the capacity of the whole project.

6.5. Solid Waste Management

The proposed project will generate massive solid wastes both during construction and operational phases. An integrated solid waste management system is recommendable. The proponent will give priority to reduction at source of the materials. This option will demand a solid waste management awareness programme in the management.



7. ENVIRONMENTAL MANAGEMENT/ MONITORING PLAN (EMP)

The environmental management plan involves risk management strategies that should be undertaken by the project proponent and the project manager to mitigate environmental degeneration. They are approaches to monitor, control, reclaim and restore the environment back to its appropriate state. EMPs for projects thus provide logical frameworks within which the identified issues of environmental concern can be mitigated, monitored and evaluated. Environmental monitoring involves measurement of relevant parameters, at a level of details accurate enough, to distinguish the anticipated changes. Monitoring aims at determining the effectiveness of actions to improve environmental quality.

The environmental management and monitoring plans have been developed and outlined to bring home the key findings of the Environmental Impact Assessment of the project in mention, recommending necessary mitigation actions, defining roles, monitor able indicators and the estimated cost.

The EMPs outlined in tables hereafter address the potential negative impacts and mitigation measures as well as roles, costs and monitor able indicators that can help to determine the effectiveness of actions to upgrade the quality of environment; as regards the proposed project. The EMPs have considered both construction and occupation phases.



Table 4: Environmental Management Plan

	Construction or machinery installation phase				
Activity	Action required	Frequenc	Responsibilities		
		У			
Planning phase	 Make sure that the facility's construction (maintenance) activities and operations are compliant with all applicable permissions from local authorities, ministries, and other relevant entities. Make sure all hired workers and contractors sign a contract that contains the EMP. Make sure that everyone who will be on site, including contractors, subcontractors, staff, and others, understands the contents of the EMP. Provide for the appointment of a Health, Safety, and Environmental Coordinator to oversee the implementation of the EMP, general environmental compliance, and occupational health and safety at the site. When feasible, have the following emergency plans, supplies, and staff on hand to handle any potential emergencies: Risk management / mitigation / EMP/ Emergency Response Plan and HSE Manuals; - Adequate protection and indemnity insurance cover for incidents; Comply with the provisions of all relevant safety standards; - Procedures, equipment and materials required for emergencies. If one hasn't been set up before, create and keep an account for the ecological restoration of the project site in the event of a spill, the end of project operations, site decommissioning, and the need for pollution cleanup or environmental restoration. 	Once off As necessary	Proponent/EAP		



	 Create and/or uphold a reporting system to document all aspects of construction, operations, and decommissioning as specified in the EMP. Preserve evidence of monitoring report submissions (submitted every six months) for use, if necessary, in conjunction with applications for the renewal of environmental clearance certificates. To ensure that the environmental clearance certificate is renewed before it expires, appoint a specialist environmental consultant to update the EMP and EIA. 		
Solid Waste Generation	 The contractor or proponent should work hand in hand to facilitate waste handling and disposal from the site. All waste resulting from construction works, land reclamation, or any other activity should be collected and disposed of appropriately such as in a sanitary landfill or an alternative municipal/government-permitted disposal site. The waste materials should be properly segregated and separated to encourage recycling of some of them with the approval of the site engineer. Uncontrolled littering in the facility and surrounding areas should be prevented 	Ongoing	
Excavation Works	• Put up conspicuous signage indicating the facility's entry and departure points.	As necessary	Contractor
Noise	 To avoid hearing impairment and nuisances, adhere to the Labour Act's Health and Safety Regulations (2007) and/or the World Health Organization's (Guidelines for Community Noise, 1999), which set maximum noise levels. For maximum noise reduction, every machinery has to have routine maintenance performed. Provide hearing protectors as standard personal protective equipment (PPE) for workers in noisy environments. 	Ongoing	Proponent/Contractor

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Air quality	• Employees must be provided with suitable masks in areas with high levels of dust or fumes.	Ongoing	Proponent/Contractor
	 When it comes to dust of fumes. When it comes to dust-related complaints, complaints register ought to be maintained, along with any appropriate mitigating measures (such dust suppression) to resolve the concerns. 		
	 Watering all active construction areas as and when necessary to lay dust 		
	• Cover all trucks hauling soil, sand and other loose materials or require all trucks to maintain at least two feet of freeboard.		
	• Apply water when necessary, or apply (non-toxic) soil stabilizers on all unpaved access road, parking areas and staging areas at construction sites.		
	• Sweep regularly (with physical sweepers) the parking area and staging areas at the project sites.		
	• All construction machinery shall be marinated and serviced in accordance with the contractors" specifications.		
	• Dust generating activities like excavation, handling and transportation of soil will be avoided during strong winds.		
	• The Labour Act of 2007 Regulation pertaining to the health and safety of employees at work shall be followed by all emissions releases.		
	• Perform a recurring health assessment among the employees and collaborate with adjacent medical establishments to perform passive monitoring of the		
	surrounding populace for illnesses associated with these emissions		
Occupational Health and	• It is imperative to designate hazardous and restricted areas, as well as equipment and items that pose a risk.	Ongoing	Proponent/Contractor
Safety	• Additionally, equipment that is to be stored on site needs to be arranged in a way that discourages theft and other illegal activity.		



	 Assure that every employee has the necessary and sufficient personal protective equipment (PPE). Ensure that all staff members receive sufficient training on handling hazardous materials and operating equipment. The Labour Act's requirements for health and safety must all be followed. Establishing a maintenance log for every piece of machinery and locations where hazardous materials and fuel are stored. First aid training for specific staff members is required, and an on-site first aid kit is required. All emergency services' contact information needs to be easily accessible. To serve as a monitoring and mitigating tool, implement and maintain an integrated health and safety management system that includes the following: color-coding of pipes; operational, safe work, and medical procedures; work permits; emergency response plans; housekeeping regulations; MSDSs; and signage requirements (flammable, PPE, etc.). Security protocols and appropriate security measures must be in place to protect employees and clients. Tight security measures that hinder unauthorized access 		
Increased water demand	 Promptly detect and repair of water pipe and tank leaks Staff to conserve water e.g., by avoiding unnecessary toilet flushing. Ensure taps are not running when not in use 	Ongoing	Proponent/contractor
Traffic	• The effects of traffic will be lessened by the placement of warning and directional signage.	Ongoing	Proponent/contractor



Operation phase				
Activity	Action required	Frequency	Responsibilities	
Effluent discharge	 Ensure that no water from the waste oil plant will be discharged to the municipal drainage or disposed to the ground. The water can be reused in sectors such as construction after testing according to the municipal procedures. Monitor effluent quality regularly to ensure that the stipulated discharge rules and standards are not violated. Preserve evidence of monitoring report submissions (submitted every six months) for use, if necessary, in conjunction with applications for the renewal of environmental clearance certificates. To ensure that the environmental clearance certificate is renewed before it expires, appoint a specialist environmental clearance to undet the EMD and ELA 	Ongoing	Proponent	
Oil spillage	 Maintain a Spill Response Plan and keep it current. Contain and cover all solid and liquid wastes. Ensure absorbent materials and other spill response equipment are maintained in accordance with local regulations and procedures for containment and clean-up of different spills, and that they are easily accessible from anywhere in the facility. Spot clean leaks and drips routinely. Collection and Storage Use of 2" Oil Suction and Delivery Hoses Type T605 during bunkering and offloading at the collection points and plant 	Ongoing	Proponent	



	 Use of impermeable tanks for storage Construction of bund walls for secondary containment Spill Clean-up Stop spills at the source. Prevent wash water from spill clean-up from flowing to a gutter or a storm/sewer drain. Use granular absorbents (e.g., cat litter) to absorb spills. 		
Traffic	 Promptly inform the Local Authority of major spills. The effects of traffic will be lessened by the placement of warning and directional signage. Follow municipal designated routes for trucks during collection and delivery to suppliers 	Ongoing	Proponent
Fire	 Sufficient water should be made available on site for firefighting purposes. Ensure that all fire-fighting devices are in good working order. Regular inspections and services should be carried out to inspect and test firefighting equipment. All fire precautions and fire control at the waste oil storage plant must be in accordance with SANS 10089-1:1999, or better. Signs for no smoking and mobiles, should be displayed on site. All fire precautions and fire control at the plant must be in accordance with SANS 10089-1:2008, or better. Ensure that all hazardous materials are stored in accordance with MSDS, SANS, and permit requirements. Keep tanks away from heat sources and other ignition sources. 	Ongoing	Proponent



	• Make sure heating coils are always covered with product		
	at least 15 centimeters should be and bond all equipment		
	to prevent electrostatic charges during numping		
	Maintain neuting site machanical and alectrical		
	• Maintain routine site, mechanical, and electrical		
	inspections and maintenance.		
	• Clean up any spills or leaks.		
	• Take particular note of the pertinent regulations outlined		
	in sections 47 and 48 of the Petroleum Products and		
	Energy Act, 1990 (Act No. 13 of 1990).		
	• Maintaining a comprehensive fire protection and		
	prevention plan that includes an emergency response plan.		
	firefighting plan, and spill recovery plan is necessary.		
	• It is also important to maintain firefighting equipment		
	good housekeeping and personnel training (firefighting		
	fire prevention and responsible housekeeping practices)		
	All of these requirements are outlined in the SANS		
	• All of these requirements are outlined in the SANS		
	standards for operation and maintenance of the facility,		
	which are in line with the requirements of the pert for		
	refining used mineral oil, storage, and handling.		- /
Occupational	• Comply with all Health and Safety standards specified	Ongoing	Proponent/Contracto
Health and	in the Labour Act.		r
Safety	• Train workers how to use the equipment safely and		
	effectively		
	• Training on occupational health and safety.		
	• Safety talks to be done every day before the		
	commencement of work.		
	Emergency response plans should be present		
	 Safety officer to be stationed at the site 		
	• Safety officer to be stationed at the site.		
	• Formulation of a safety health and environment workers		
	committee.		



	 A fully stocked first aid kit should permanently be available on site as well as an adequately trained staff member in a position to administer first aid. All workers should have access to the appropriate Personal Protective Equipment (helmets, gloves, respirators, work suits, earplugs, safety goggles, and safety shoes where applicable). Proper ablution facility should be used and clearly marked for males and females. Use dust suppression measures. Maintain good housekeeping. Reduce noise exposure by isolating noisy equipment and rotate tasks. Conduct Hazard identification and risk assessments. Any leakage/spillage shall be immediately attended and provision of urgent cleaning. Work area should be monitored to maintain work environment free from any hazards. Provisions of immediate accident/incident reporting and investigation. Safety posters and signages should be exhibited at conspicuous places. 		
Education and Training	 All employees including all contractors appointed for maintenance work on the respective infrastructure and their employees must be made aware of necessary health, safety and environmental considerations applicable to their respective work. Records of environmental training and incidents should be maintained. Post instructional/ informational signs regarding storm water pollution around the facility for customers and employees. 	Ongoing	Proponent



• Place signs on faucet (hose bibbs) reminding employees and customers to conserve water and not to use water to clean up spills.	
• Label drains within the facility boundary by paint/ stencil (or equivalent), to indicate whether they flow to an on-site treatment device, directly to the sanitary sewer or to a storm drain	


8. ENVIRONMENTAL MONITORING

It is recommended to continue monitoring the identified environmental receptors in order to assure continuous improvement in environmental performance and mitigate the likelihood of any negative impacts. The Contractor, whose environmental performance will be regulated by the ECO, will be in charge of overseeing all operations during the construction phase. The following activities will take place for monitoring the aforementioned impacts:

- Keep record of volumes of waste oil receipt and include in figures in monthly, quarterly, bi-annual and annual summary reports.
- Waste risk register for compliance to the relevant legislation
- Bi-annual & Annual summary report based on educational programmes and training conducted.
- Ensure that all training is certified or managerial reference provided (proof provided to the employees) inclusive of training attendance, completion and implementation.
- Facility inspection sheet for all areas which may present environmental health risks, kept on file.
- Continued monitoring and documenting of spills.
- Any complaints received regarding traffic issues should be recorded together with action taken to prevent impacts from repeating itself.
- Any workplace health and safety incidents must be recorded with action taken to prevent future occurrences. A in monthly, quarterly, bi-annual and annual reports should be compiled of all incidents reported. The reports should contain dates when training were conducted and when safety equipment and structures were inspected and maintained.
- A register of all fire 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.

- Any complaints received regarding dust, fuel or emissions should be recorded with notes on action taken to address concerns. Incidents log to be kept of all nonconformance related to the operation and management of the wet scrubber (such as not engaging the system during operations). Air quality management plan to be documented and include monitoring. All information and reporting to be included in a bi-annual report.
- A register of hazardous waste disposal should be kept. This should include type of waste, volume as well as disposal method/facility. Compliance to the municipal effluent permit conditions and testing as may be prescribed by the municipality. All monitoring results should be kept on file and included in a bi-annual report. All information and reporting to be included in a bi-annual report.
- Groundwater monitoring for petroleum hydrocarbons must be conducted annually and remediation instituted where needed. A report should be compiled bi-annually of all monitoring and spills or leakages reported. The report should contain the following information: date and duration of spill, product spilled, volume of spill, groundwater monitoring results, remedial action taken, etc., and a copy of documentation in which spill was reported to Ministry of Mines and Energy

9. DECOMMISSIONING AND SITE CLOSURE

The proposed plant has a capacity to contain 83000m³ of oil which is within the stipulated capacity of oil storage and handling (i.e. 100000m³) in the Walvisbay Light Industrial area. In the event of expansion, the plant should be relocated to the heavy industrial are hence decommissioning and rehabilitation of the area is required. Buildings and subterranean infrastructure must all be completely removed as part of the decommissioning process. The site has to be cleaned up of any contamination. During this phase, there will be noise and waste production as the structures are disassembled. WHO guidelines must be followed when it comes to noise levels, and waste needs to be confined and disposed of at a facility that has been properly classified and approved rather



than being thrown into the neighborhood. Before decommissioning, the land should be evaluated for potential future uses, and if it is not, rehabilitation should be started. When the facility is being decommissioned, the EMP for it must be reviewed to account for any modifications made to the site and to put policies and mitigation measures in place.

10.CONCLUSION

The proponent is expected to assume a prominent role in the execution of this EMP, guaranteeing appropriate cooperation with other relevant parties and offering training to all staff members, contractors, and subcontractors. Along with ensuring that the required resources (financial, personnel, etc.) and synergies are available, the proponent should also see to it that this EMP is implemented. This Environmental Management Plan (EMP) will be deemed legally bid upon approval by the authorities. Any deviation or violation will be subject to legal penalties under the Environmental Management Act, No. 07 of 2007. This EMP was prepared using the most recent information available; modifications or departures from the project's original concept will need updating this EMP.

Last but not least, this EMP is in effect till the project has been completed successfully. This EMP will be duplicated and stored on site. It is expected of the responsible authority to oversee and examine this project on a regular basis, as well as to submit reports on it on an annual basis or more frequently as the authority sees fit.



REFERENCES

Corbett I. 2018. The Influence of the Benguela Low-Level Coastal Jet on the Architecture and Dynamics of Aeolian Transport Corridors in the Sperrgebiet, Namibia. Unpublished Report https://pdfs.semanticscholar.org/a036/eb86ca35ceee1f19198d2735c93d36f9ac35.pdf?_ga=2.153 4 98104.1710554377.1586180758-213198396.1586180758 Accessed on 7 April 2020

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Namibian Government Notice No. 30 Environmental Impact Assessment Regulations, 2012, Directorate of Environmental Affairs, Ministry of Environment and Tourism, Windhoek.

Ecosustainability Hub Consultants Ltd, August 2019: Environmental and Social Impact Assessment Study Report for the Proposed Used Lubricating Oil Recycling Plant (2000 Liter per 8 hours) on Plot L.R. Kwale/Mazeras/1034, Mazeras, Kwale County.

Environmental Management Act (2007).

ERM; September 2011; Groundwater Monitoring at the Walvis Bay Depot, Walvis Bay, Namibia

IFC World Bank Group, 2007. General EHS guidelines: Environmental, Air Emissions and Ambient Air Quality. www.ifc.org/ehsguidelines.

Nickel Development Institute. http://www.nickelinstitute.org/~/Media/Files/TechnicalLiterature/ StainlessSteelsinABC_GuidelinesforCorrosionPrevention_11024_.pdf Accessed 08/05/2013

Petroleum Products and Energy Act of Namibia (1990)

South African National Standard 10089-3 (2010).



APPENDICES

Appendix A: CV of team leader

PERSONAL	JOHANNES S. MUNANGO					
INFORMATION	 ERF 316, Atalia street, Elisenheim, Windhoek, 9000, Namibia +264 814112046 					
	raychilunda@gmail.com P.O.B OX 32237, Pioneerspark, Windhoek, Namibia					
	Sex Male Date of birth 09/03/1993 Nationality Namibian					
PERSONAL STATEMENT	Johannes Munango is a highly enthusiastic, qualified safety health and environmental scientist with over 5 years of SHE consulting experience. He holds a BSc (Hon) in Integrate Environmental Science and an MSc in Environmental Science. He specializes in the fields or hazard identification and risk assessment, accident and incident investigation, workplace inspections and trainings. In addition to the above, Johannes is also well versed in formulating Environmental and Social Risks Screening Reports and has been part and parcel of large ESIA projects. He is familiar with and experience of undertaking environmental assessment in Namibia in compliance with the Namibian Environmental management act of 2007 and th EIA requisitions of 2012.					
WORK EXPERIENCE						
CURRENT	POSITION					
	Position occupied: Project Technical Expert: CBIT Project					
	Name of Company: GIZ Period of Employment: 01 July 2021– Curent					
RESPONS	IBILITIES					
	 Assist in the day to day management, planning, organising and implementation of all activities relating to the attainment of the objective, outcomes and outputs of the CBIT Project 					
	 Assist in activities under the Climate Change Unit. 					
	 Ensuring Health & Safety awareness and compliance Updating and development of health and safety documentation 					
PREVIOUS						
FREVIOUS	Position occupied: SHE Consultant					
	Name of Company: GIZ					
	Period of Employment: 14" September 2020–29" November 2020					
RESPONS	IBILITIES					
	 In consultation with programmes/project team, lialse with stakeholders including private sector, NGO's, civil society and development partners to further objectives of the Climate changeunit 					
	 Training, induction and awareness in Safety Health and Environmental issues Workplace SHE Audits, Hazard identification and Risk Assessments Prepare, implement and monitor work plans with team members for different programs 					
PREVIOUS	POSITION					
	Position occupied: Guest lecturer (Voluntary) Name of Company: Namibia University of Science and Technology Period of Employment: 2 nd March 2020–13 th March 2020					
RESPONS	IBILITIES					
PREVIOUS	 Teaching: Environmental ImpactAssessment S POSITION 					
	Position occupied: Junior SHE Practitioner (Safety Health & Environment) (Part-time) Name of Company: HJ Geo Enviro consulting and trading Cc Period of Employment: 2013–2016					
RESPONS	IBILITIES					
Safety Hea	Ith & Environmental documents development, trainings and workplace inspections					
	Page 1/6					







EZ	2013/20 13	For references Mr J Sirunda Johannes.sirunda@gmail.	Namibia	Environmental Impact Assessment (EIA) and Environmental Management Plan (EMP) for the proposed granite exploration study by Stone Evolution and Equipment Hire Cc, Swakopmund Responsibilities: Junior SHE Practitioner
		Johannes.sirunda@gmail.		Junior SHE Practitioner
		<u>com</u>		
		Com		Safety and Health
				Management and document
		Cell:0811450613		development Screening of
				impacts: Water quality
				sampling: Formulating
				contingency plans for spills and
				discharge of toxic chemicals
E3	Since	Bohale Investment Cc	Namibia	Environmental Impact Assessment (EIA) and
	2014/20			Environmental Management for the proposed small
	14	For references:		scale surface mining for marble for EPL: 4693, and
		Managing Director Bohale		4694, Erongo Region, Karibib District, Namibia by
		Investment Cc		Bohale Investment Cc, Karibib.
		POBOX 2326		Responsibilities:
		Swakopmund Bohale		Lead EAP
		Investment CC		Screening of impacts Public
				consultations Environmental
				scoping
				Environmental impact assessment, Environmental
				management plan Environmental Control and
				Monitoring
				Health and Safety researches
E4	2014	For references: Mr Email: For references Mr J Sirunda	Namibia	Environmental Impact Assessment (EIA) and Environmental Management Plan (EMP) for the proposed upgrading and renovation of domestic wastewater oxidation pond system for the Himarwa Ithete Senior Secondary School, Kavango West Region, Mpungu District, Namibia.
		Jonannes.sirunda@gmail.		Responsibilities:
		Com		EAP
		Cell:0811450613		Screening of impacts and risks Public
				consultations Environmental scoping
				Environmental assessment
E 5	2014	Ministry of Higher Education	Namihia	Environmental Impact Assessment (EIA) and
ED .	2014	Innovation and Training, DEKA Consulting Engineers For references: Mr. A De Jesus Managing Director Email: <u>antonio@dekaconsult.co m</u>	Namola	Environmental Management Plan (EMP) for the proposed domestic wastewater oxidation pond system for Okalongo Settlement, Omusati Region, Outapi District, Namibia. Responsibilities:
				EAP
				Screening of impacts Public
				consultations Environmental
				scoping
				Environmental impact assessment, Environmental
				management plan Environmental Control and
				Monitoring







REPUBLIC OF NAMIBIA

MINISTRY OF MINES AND ENERGY

Tel.: +264 61 284-8111 Fax: +264 61 238643 / 220386 E-mail: info@mme.gov.na Website: www.mme.gov.na 6 Aviation Road Private Bag 13297 WINDHOEK

PERMIT

FOR USED MINERAL OIL

PERMIT NO: 05/2024

Enquiries: I Gaingob Reference: 10/3/2

17 January 2024

1. In terms of Section 2(1) of Petroleum Products and Energy Act, 1990 (Act 13 of 1990) permission is hereby granted to:

GAC Investments CC P O Box 5835 Walvis Bay Namibia

To perform the following activities in respect of used mineral oil:

- Collect and store used mineral oil at the premises situated at Erf 2613, Hidipo Hamutenya Drive, Walvis Bay.
- Transportation of used mineral oil and refined products throughout Namibia.
- Collection and processing of used filters at Aris Industrial Area.
- 2. This Permit is valid for a used mineral oil volume of up to 1600 000 liters.
- 3. This Permit is issued subject to the conditions as laid down in Regulations No. 112 of 1991 dated 11 October 1991 relating to the purchase, sale, supply, acquisition, usage, possession, disposal, storage, transportation, recovery, and re-refinement of used mineral oil as issued in terms of Section 2(1) of the Act and is only valid until 17 January 2025.

All official correspondence must be addressed to the Executive Director



- 4. This Permit is issued subject to the following further conditions:
 - 4.1 All Municipal and other Health Regulations to be adhered to.
 - 4.2 All Transport Regulations to be followed regarding proper tankage, as laid down by the Ministry of Works and Transport.
 - 4.3 All fire hazard and/or security measures to be taken in conformity with the SABS Specification 086 and 089.
- 5. Statistics will have to be provided before or on 28 February on an annual basis, to the:

Executive Directory Ministry of Mines and Energy Private Bag 13297 Windhoek Namibia

Attention: Mr. I Nghishoongele

Re-application for this permit must occur 30 days prior to the expiry date.

Issued at Windhoek on 17 January 2024.

Penda Ithindi Bag 13297 Acting Executive Director

-01-19

- Cc. (1) Mr. Harold Schmidt PROMEX CC Secretary to Oil Industry P.O. Box 11335 Klein Windhoek, Windhoek
 - (2) Executive Director Ministry of Works and Transport Private Bag 13341 Windhoek
 - Municipality of Walvis Bay Health Department Private Bag 5017 Walvis Bay



Appendix C: Newspaper Adverts







Appendix D: Public Consultation Attendance Registers







ATTENDANCE REGISTER

PUBLIC PARTICIPATION MEETING FOR WASTE MANAGEMENT PLANT FOR GAC INVESTMENT VENUE: WALVISBAY MUNICIPALITY LIBRARY TOWN HALL DATE: 14 DECEMBER 2023

Name	Email address/Phone No.	Organisation & Title	Signature
LESLIE	ingo @ royalshe gconsultar	M ROYAL SHED	aus
charmaire	Amuaabe	community member	Gal
Nance	Charmaine Munga full	remmunity member	Bhilles
Nomes Ansills	nomusa 12 2 45 Aunalla	a community maked	tontal
2 SHALLEMA	rshailom (Quahan, Com	NAMPORT MARIN APPICEN	R.
T. D. L	CHER Qaca har hand	SHRED Name OF	(A)
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+264 81 035 8451 crownedeagleinvestcc@gmail.com Unit 6, Acacia Flats, Dorado Park, Windhoek



Crowned Eagle Management And Personnel Consultants



ATTENDANCE REGISTER

2nd CONSULTATION MEETING WITH THE MUNICIPALITY OF WALVISBAY VENUE: WALVISBAY MUNICIPALITY WWE KUISEB BOARDROOM DATE: 24 JANUARY 2024 TIME 100M - 110M

CE

Name	Email address/Phone No.	Organisation & Title	Signature
Hou Au A	Thaikula@walvislavcc.u	ging Mun of Walvis Bay	Soll
Lovisa Marial	inadians Quadration of - N(9.00	Musicipatity of Welvis Bay (Health Section).	ton
legina in mindleal	Jancievise wantspiper of the	na walustopan Municipality	Gentrase
elizason nous	en and entre Wallishaw	cora na Mun of Walvis Bay	Normatk
Vangula Amulenya	Inama Engle Warvio and	MUNDER MANAGEN' SWEMY	Sestion
SAVID UUSHOUP	BUUSHONNE	D- NICOLASS (TOWN RANWING)	Mause
PHRAM NAMBARFU	Chambehalowell/sheeper.eve.	The man wer class cristing	11
1			
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+264 81 035 8451 crownedeagleinvestcc@gmail.com Unit 6, Acacia Flats, Dorado Park, Windhoek







# investments Appendix F: Consent letter from land owner

George Frederick Rautenbach P.O. Box 688 Telephone: +246 203303 Mobile: 081 124 5056 Email: georgerauti@outlook.com Walvis Bay / Namibia 27 November 2023

#### GAC Investments CC/2011/5835

P.O. Box 5835

Email: gac.info@iway.na

Mobile No: + 264 81 651 4619 / +264 81 036 4662

Erf: 4482, Langer Heinrich Crescent No. 17 & 19

Walvis Bay / Namibia

#### To whom it may Concern.

Re. Consent Letter to construct a Used Oil Recycling and Storage Plant on Light Industrial Erf: 2613 situated at Number 79, Hidipo Hamutenya Drive in Walvis Bay.

I George Frederick Rautenbach ID: 560207 0018 6, owner of Ligh Industrial Erf: 2613 situated at Number 79, Hidipo Hamutenya Drive, Walvis Bay hereby give permission to Godwin Cloete ID: 830218 1057 8 owner of GAC Investments CC/2011/5835, to use Light Industrial Erf: 2613 situated at Number: 79, Hidipo Hamutenya Drive, Walvis Bay and to erect and conduct a Used Oil Recycling and Storage Plant as per their Environmental Impact Study, Department of Mining and Energy Certification and Local Authority Hazardous and Waste Management Trading Certificate.

If you have any queries about this correspondence, please feel free to contact me.

Yours Sincerely

George Frederick Rautenbach