

**APP-003312**

**CONSTRUCTION AND OPERATIONS OF A FUEL DEPOT IN  
OPUWO, KUNENE REGION**

**ENVIRONMENTAL MANAGEMENT PLAN**



**Prepared by:**



**Prepared for:**

**Teuefi Trading CC**

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<b>Project:</b>	<b>CONSTRUCTION AND OPERATIONS OF A CONSUMER FUEL INSTALLATION FOR THE NAMIBIAN POLICE FORCE IN ONGHA, OHANGWENA REGION: ENVIRONMENTAL MANAGEMENT PLAN</b>	
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## **1 INTRODUCTION**

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Teuefi Trading CC requested Geo Pollution Technologies (Pty) Ltd to undertake an environmental assessment for the construction and operations of a **new** fuel wholesale facility (depot) on Portion F of Opuwo Town and Townlands No.876, Opuwo, in the Kunene Region. The Opuwo fuel depot will form part of the NAMCOR franchise, and will include a fuel wholesale facility (diesel only) and the sale of oils and lubricants. Construction activities will include the installation of an aboveground storage tank, all reticulation and a spill slab area with a pump island. Operations of the fuel wholesale facility will include filling of the aboveground storage tanks from road transport tankers, dispensing of fuel to customers, tank dips and fuel volume reconciliation, as well as general operational activities and maintenance procedures associated with a fuel wholesale facility and associated infrastructure. In support of the environmental assessment, an environmental management plan (EMP) was developed and is represented in this report.

## **2 OBJECTIVES OF THE EMP**

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The EMP provides management options to ensure impacts of the construction and operations are minimised. An EMP is a tool used to take pro-active action by addressing potential problems before they occur. This should limit the corrective measures needed, although additional mitigation measures might be included if necessary. The EMP acts as a stand-alone document, which can be used during the various phases (planning, construction, operational and decommissioning) of any proposed activity or development.

All contractors and sub-contractors taking part in both the construction and operations associated with the facility should be made aware of the contents of the EMP, so as to plan the relevant activities accordingly in an environmentally sound manner.

The objectives of the EMP are:

- ◆ to include all components of the various activities;
- ◆ to prescribe the best practicable control methods to lessen the environmental impacts associated with the both construction and operation activities;
- ◆ to monitor and audit the performance of the operational personnel in applying such controls; and
- ◆ to ensure that appropriate environmental training is provided to responsible personnel and contractors.

## **3 IMPLEMENTATION OF THE EMP**

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Section 4 outline the management of the environmental elements that may be affected by the different activities. Impacts addressed and mitigation measures proposed are seen as minimum requirements which have to be elaborated on by the client where required. Delegation of mitigation and reporting activities should be determined by the proponent and included in the EMP. The EMP is a living document that must be prepared in detail, and regularly updated, by the proponent as the project progress and evolve.

The EIA, EMP and environmental clearance certificate must be communicated to the site managers. All monitoring results must be reported on as indicated. These are important for any future renewals of the environmental clearance certificate and must be submitted bi-annually to the Ministry of Environment, Forestry and Tourism.

## **4 MANAGEMENT OF IMPACTS**

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### **4.1 CONSTRUCTION AND OPERATIONS**

The following section provide management measures for both the operational phase as well as construction activities related to the proposed fuel installation.

#### 4.1.1 Planning

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

- ◆ Ensure that all necessary permits from the various ministries, local authorities and any other bodies that govern the construction activities and operations of the project are in place and remains valid. This includes the petroleum products licence.
- ◆ Ensure all appointed contractors and employees enter into an agreement which includes the EMP. Ensure that the contents of the EMP are understood by the contractors, sub-contractors, employees and all personnel present or who will be present on site.
- ◆ Make provisions to have a Health, Safety and Environmental Coordinator to implement the EMP and oversee occupational health and safety as well as general environmental related compliance at the site.
- ◆ Have the following emergency plans, equipment and personnel on site where reasonable to deal with all potential emergencies:
  - EMP / Risk management / mitigation / 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 has not already been established, establish and maintain a fund for future ecological restoration of the project site should project activities cease and the site is decommissioned and environmental restoration or pollution remediation is required.
- ◆ Establish and / or maintain a bi-annual reporting system to report on aspects of construction activities, operations and decommissioning as outlined in the EMP.
- ◆ Submit bi-annual reports to the MEFT to allow for environmental clearance certificate renewal after three years. This is a requirement by MEFT.
- ◆ Appoint a specialist environmental consultant to update the environmental assessment and EMP and apply for renewal of the environmental clearance certificate prior to expiry.

#### **4.1.2 Skills, Technology and Development**

During the construction and operations of the facility, training will be provided to a portion of the workforce to be able to construct and operate various features of a fuel wholesale facility according to the required standards. Skills will be transferred to an unskilled workforce for general tasks. The technology required for the development of the facility may be new to the regional industry, aiding in operational efficiency. Development of people and technology are key to economic development.

**Desired Outcome:** To see an increase in skills of local Namibians, as well as development and technology advancements in the fuel wholesale industry.

#### **Actions**

##### **Prevention:**

- ◆ If the skills exist locally, contractors must first be sourced from the town, region, and then nationally. Deviations from this practice must be justified.
- ◆ Skills development and improvement programs to be made available as identified during performance assessments.
- ◆ Employees to be informed about parameters and requirements for references upon employment.
- ◆ The Proponent must employ local Namibians where possible. Deviations from this practise should be justified appropriately.

##### **Responsible Body:**

- ◆ Proponent
- ◆ Contractors

##### **Data Sources and Monitoring:**

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

### **4.1.3 Revenue Generation and Employment**

Construction of the facility is hinged on employment. Skilled and unskilled labour will be employed for the installation of the tank and associated infrastructure as well as general earth works. Unskilled labour may be sourced locally while it is expected that skilled contractors within Namibia will be used for specialised work. The construction phase will therefore contribute to employment creation in the unskilled labour sector while contributing to sustaining employment of the skilled sector during the construction phase.

In addition, Opuwo being the capital of the Kunene Region, a growth in the town population and further development of the town is also expected. The facility will thus ensure a reliable supply of fuel to fuel outlets which supply the business and growing tourism industry. The change in land use will lead to changes in the way revenue is generated and paid to the national treasury. An increase in skilled and professional labour will take place due to the operations of the facility.

**Desired Outcome:** Contribution to national treasury and provision of employment to local Namibians. Create a competitive environment to enhance service delivery to the area.

#### **Actions**

##### **Prevention:**

- ◆ The Proponent should employ local Namibians where possible.
- ◆ If the skills exist locally, employees must first be sourced from the town, then the region and then nationally.
- ◆ Deviations from this practice must be justified.

##### **Responsible Body:**

- ◆ Proponent

##### **Data Sources and Monitoring:**

- ◆ Bi-annual summary report based on employee records.

#### **4.1.4 Demographic Profile and Community Health**

The project is reliant on labour during the construction and operational phase. The scale of the project is limited and it is not foreseen that it will create a change in the demographic profile of the local community. Community health may be exposed to factors such as communicable disease like HIV/AIDS as well as alcoholism/drug abuse, associated with possible foreign construction teams and/or clients collecting fuel. An increase in foreign people in the area may potentially increase the risk of criminal and socially/culturally deviant behaviour. However, such trends are considered unlikely. Spills and leaks may present risks to members of the public. The project may further contribute to cumulative demand for services for the region which includes electricity and water supply.

**Desired Outcome:** To prevent the in-migration and growth in informal settlements and to prevent the spread of diseases such as HIV/AIDS.

#### **Actions:**

##### **Prevention:**

- ◆ Employ only local people from the area, deviations from this practice should be justified appropriately.
- ◆ Facility design to incorporate water and energy saving technologies such as low energy electrical appliances and lighting.
- ◆ Educational programmes for employees on HIV/AIDs and general upliftment of employees' social status.
- ◆ Appointment of reputable contractors.

##### **Responsible Body:**

- ◆ Proponent

##### **Data Sources and Monitoring:**

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



#### **4.1.5 Fuel Supply**

The construction and operation of the facility will aid in securing fuel supply to the various industries and business in the town and region.

**Desired Outcome:** Ensure a secure fuel supply remains available to the area.

##### **Actions**

###### **Prevention:**

- ◆ Ensure compliance to the petroleum regulations of Namibia.
- ◆ Proper management to ensure constant supply.
- ◆ Record supply problems and take corrective actions.

###### **Responsible Body:**

- ◆ Proponent

###### **Data Sources and Monitoring:**

- ◆ Record supply problems and corrective actions taken and compile a bi-annual summary report.

#### **4.1.6 Traffic**

The facility may increase the traffic flow to the site through the provision of construction material (construction phase) and fuel (operational phase). This may increase the risk of incidents and accidents.

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

#### **Actions**

##### **Prevention:**

- ◆ Erect clear signage regarding access and exit points at the facility.
- ◆ Erect clear signage related to the presence of the Kindergarten to all vehicles exiting the site. Discussion should be held with the RA to enquire whether there may be any recommendations for implementation.
- ◆ Tanker trucks delivering fuel should not be allowed to obstruct any traffic.
- ◆ If any traffic impacts are expected, traffic management should be performed to prevent these.
- ◆ The placement of signs to warn and direct traffic will mitigate traffic impacts.
- ◆ Consultation and approval from the town council regarding designs and access to the facility from the main road are required.
- ◆ The Proponent needs to continue engaging with the Roads Authority and acquire the required permissions prior to the facility being erected.
- ◆ All proposed construction and operations activities should adhere to the road reserve requirements of the district road.
- ◆ Tanker trucks delivering fuel should not be allowed to obstruct any traffic.

##### **Responsible Body:**

- ◆ Proponent

##### **Data Sources and Monitoring:**

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

#### **4.1.7 Health, Safety and Security**

Every activity that will be associated with the construction and operational phase is reliant on human labour and therefore will expose them to health and safety risks. Activities such as the operation of machinery and handling of hazardous chemicals (inhalation and carcinogenic effect of some petroleum products), will pose the main risks to employees. Security risks will be related to unauthorized entry, theft and sabotage.

**Desired Outcome:** To prevent injury, health impacts and theft.

##### **Actions**

##### **Prevention:**

- ◆ Clearly label dangerous and restricted areas as well as dangerous equipment and products.
- ◆ Equipment that will be locked away on site must be placed in a way that does not encourage criminal activities (e.g. theft).
- ◆ Provide all employees with required and adequate personal protective equipment (PPE).
- ◆ Ensure that all personnel receive adequate training on operation of equipment / handling of hazardous substances.
- ◆ All health and safety standards specified in the Labour Act should be complied with.
- ◆ Implementation of maintenance register for all equipment and fuel/hazardous substance storage areas.
- ◆ Selected personnel should be trained in first aid and a first aid kit must be available on site. The contact details of all emergency services must be readily available.
- ◆ Implement and maintain an integrated health and safety management system, to act as a monitoring and mitigating tool, which includes: colour coding of pipes, operational, safe work and medical procedures, permits to work, emergency response plans, housekeeping rules, MSDS and signage requirements (PPE, flammable etc.).
- ◆ Security procedures and proper security measures must be in place to protect workers and clients, especially during cash in transit activities.
- ◆ Reduce the amount of cash kept on site to reduce the risk of robberies.
- ◆ Strict security that prevents unauthorised entry during construction phases.

##### **Responsible Body:**

- ◆ Proponent
- ◆ Contractors

##### **Data Sources and Monitoring:**

- ◆ Any incidents must be recorded with action taken to prevent future occurrences.
- ◆ A bi-annual report should be compiled of all incidents reported. The report should contain dates when training were conducted and when safety equipment and structures were inspected and maintained.

#### 4.1.8 Fire

Construction and operational activities may increase the risk of the occurrence of fires. Fuel, is flammable and therefore presents a fire and explosion risk.

**Desired Outcome:** To prevent property damage, veld fires, possible injury and impacts caused by uncontrolled fires.

**Actions:**

**Prevention:**

- ◆ Ensure all chemicals are stored according to MSDS and SANS instructions.
- ◆ Maintain regular site, mechanical and electrical inspections and maintenance.
- ◆ Clean all spills / leaks.
- ◆ Special note must be taken of the regulations stipulated in sections 47 and 48 of the Petroleum Products and Energy Act, 1990 (Act No. 13 of 1990).
- ◆ Follow SANS standards for operation and maintenance of the facility.
- ◆ All dispensers must be equipped with devices that cut fuel supply during fires.
- ◆ A holistic fire protection and prevention plan is needed. This plan must include an emergency response plan, firefighting plan and spill recovery plan.
- ◆ Maintain firefighting equipment and promote good housekeeping.
- ◆ Personnel training (firefighting, fire prevention and responsible housekeeping practices).

**Responsible Body:**

- ◆ Proponent
- ◆ Contractors

**Data Sources and Monitoring:**

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

#### **4.1.9 Air Quality**

During construction, earth works and general construction may increase ambient dust levels. Diesel is not highly volatile and during the operational phase will release only limited fuel vapours into the air during refuelling of bulk storage tanks as well as at filling points. Prolonged exposure may have carcinogenic effects.

**Desired Outcome:** To prevent health impacts and minimise the dust generated.

##### **Actions**

###### **Prevention:**

- ◆ Personnel issued with appropriate masks where excessive dust or vapours are present.
- ◆ A complaints register should be kept for any dust related issues and mitigation steps taken to address complaints where necessary e.g. dust suppression.
- ◆ Employees should be coached on the dangers of fuel vapours.
- ◆ Vent pipes must be properly placed as per SANS requirements.

###### **Responsible Body:**

- ◆ Proponent
- ◆ Contractors

###### **Data Sources and Monitoring:**

- ◆ Any complaints received regarding dust or fuel vapours should be recorded with notes on action taken.
- ◆ All information and reporting to be included in a bi-annual report.

#### **4.1.10 Noise**

Noise pollution may be generated due to heavy and light motor vehicles accessing the site to offload construction material, fuel or refuel. Construction activities are noisy by nature. The fuel wholesale facility will only operate during normal business hours which means that vehicle noise is generated throughout the day. Fuel delivery and collection will mainly be by fuel tanker trucks. Such vehicles have the potential to create noise disturbances when starting or slowing down.

**Desired Outcome:** To prevent any nuisance and hearing loss due to noise generated.

#### **Actions**

##### **Prevention:**

- ◆ Follow World Health Organization (WHO) guidelines on maximum noise levels (Guidelines for Community Noise, 1999) to prevent hearing impairment.
- ◆ All machinery must be regularly serviced to ensure minimal noise production.
- ◆ Keep volume of public address systems on a level where neighbours are not impacted on.
- ◆ Manage noise caused by clients – loud music etc.
- ◆ Hearing protectors as standard PPE for workers in situations with elevated noise levels, truck drivers should not be allowed to start or rev their engines during night time periods between 10:00 and 05:00 to ensure that noise parameters of 40 dB (for residential areas during the night) are not transgressed (Guidelines for Community Noise, 1999).

##### **Responsible Body:**

- ◆ Proponent
- ◆ Contractors

##### **Data Sources and Monitoring:**

- ◆ WHO Guidelines.
- ◆ Maintain a complaints register.
- ◆ Bi-annual report on complaints and actions taken to address complaints and prevent future occurrences.

#### **4.1.11 Waste production**

Various waste streams will be produced during the construction and operational phase. Waste may include hazardous waste associated with the handling of hydrocarbon products etc. Construction waste may include building rubble and discarded equipment contaminated by hydrocarbon products. Contaminated soil and water is considered as a hazardous waste. Domestic waste will be generated by the facility and related operations. Waste presents a contamination risk and when not removed regularly may become a fire hazard.

**Desired Outcome:** To reduce the amount of waste produced, and prevent pollution and littering.

#### **Actions**

##### **Prevention:**

- ◆ Waste reduction measures should be implemented and all waste that can be re-used / recycled must be kept separate.
- ◆ Ensure adequate disposal storage facilities are available.
- ◆ Ensure waste cannot be blown away by wind.
- ◆ Prevent scavenging (human and non-human) of stored waste.
- ◆ Waste should be disposed of regularly and at appropriately classified disposal facilities, this includes hazardous material (empty chemical containers, contaminated rugs, paper water and soil).
- ◆ The spill catchment traps and oil water separator should be cleaned regularly and waste disposed of appropriately. Surfactants (soap) may not be allowed to enter the oil water separator.
- ◆ See the material safety data sheets available from suppliers for disposal of contaminated products and empty containers.
- ◆ Liaise with the municipality regarding waste and handling of hazardous waste.

##### **Responsible Body:**

- ◆ Proponent
- ◆ Contractors

##### **Data Sources and Monitoring:**

- ◆ A register of hazardous waste disposal should be kept. This should include type of waste, volume as well as disposal method/facility.
- ◆ Any complaints received regarding waste should be recorded with notes on action taken.
- ◆ The oil water separator must be regularly inspected and all hydrocarbons removed once detected. Outflow water must comply with effluent quality standards as per town council requirements.
- ◆ All information and reporting to be included in a bi-annual report.

#### **4.1.12 Ecosystem and Biodiversity Impact**

The site is mostly void of naturally occurring vegetation due to previous and current human activities on and around the site. Some vegetation may however require removal. Construction and operations may present a pollution risk to the surrounding environment and biophysical features.

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

##### **Actions.**

##### **Prevention:**

- ◆ Educate all contracted and permanent employees on the value of biodiversity.
- ◆ Report any extraordinary animal sightings to the Ministry of Environment, Forestry and Tourism.
- ◆ Mitigation measures related to waste handling and the prevention of groundwater, surface water and soil contamination should limit ecosystem and biodiversity impacts.
- ◆ Avoid scavenging of waste by fauna.
- ◆ The establishment of habitats and nesting sites at the facility should be avoided where possible.

##### **Responsible Body:**

- ◆ Contractor
- ◆ Proponent

##### **Data Sources and Monitoring:**

- ◆ All information and reporting to be included in a bi-annual report.



#### **4.1.13 Groundwater, Surface Water and Soil Contamination**

During construction, heavy machinery may present a contamination risk to the soil, surface and groundwater through breakdowns. Operations will entail the storage and handling of various hydrocarbons (such as fuels and lubricants) which present a contamination risk. Such material may contaminate surface water, soil and groundwater. Contamination may either result from failing storage facilities, or spills and leaks associated with fuel handling. The facility will provide fuel to public vehicles which may further present contamination risks through overfills, spills and leakages. Modern wholesale facilities are well designed to reduce leakages and spillages from contaminating soil and water.

**Desired Outcome:** To prevent the contamination of water and soil.

#### **Actions**

##### **Prevention:**

- ◆ All construction machines should be maintained to be in a good working condition during operations.
- ◆ Employ drip trays and spill kits during construction when onsite servicing / repairs of equipment is needed.
- ◆ Spill control structures and procedures must be in place according to SANS standards or better and connection of all surfaces where fuel is handled, with an oil water separator.
- ◆ All fuelling should be conducted on surfaces provided for this purpose. E.g. Concrete slabs with regularly maintained seals between slabs.
- ◆ The procedures followed to prevent environmental damage during service and maintenance, and compliance with these procedures, must be audited and corrections made where necessary.
- ◆ Proper training of operators must be conducted on a regular basis (fuel handling, spill detection, spill control).

##### **Mitigation:**

- ◆ Any spillage of more than 200 litre must be reported to the Ministry of Mines and Energy.
- ◆ Spill clean-up means must be readily available on site as per the relevant MSDS and spills cleaned up immediately.
- ◆ The spill catchment traps and oil water separator should be cleaned regularly and waste disposed of at a suitably classified hazardous waste disposal facility.
- ◆ Surfactants (soap) may not be allowed to enter the oil water separator e.g. no soap usage on spill control surfaces.

##### **Responsible Body:**

- ◆ Proponent
- ◆ Contractors

##### **Data Sources and Monitoring:**

- ◆ A report should be compiled bi-annually of all spills or leakages reported. The report should contain the following information: date and duration of spill, product spilled, volume of spill, remedial action taken, comparison of pre-exposure baseline data (previous pollution conditions survey results) with post remediation data (e.g. soil/groundwater hydrocarbon concentrations) and a copy of documentation in which spill was reported to Ministry of Mines and Energy.

#### **4.1.14 Visual Impact**

This is an impact that not only affects the aesthetic appearance, but also the integrity of the facility. Bright lights used at night may impact on nearby residents.

**Desired Outcome:** To minimise aesthetic impacts associated with the facility and prevent lighting from being a visual disturbance.

#### **Actions**

##### **Prevention:**

- ◆ Regular waste disposal, good housekeeping and routine maintenance on infrastructure will ensure that the longevity of structures are maximised and a low visual impact is maintained.
- ◆ Lights should be directed downwards and away from residents where possible.

##### **Responsible Body:**

- ◆ Proponent
- ◆ Contractors

##### **Data Sources and Monitoring:**

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

#### **4.1.15 Impacts on Utilities and Infrastructure**

Impacts related to utilities and infrastructure are more likely during the construction phase when excavations are conducted on site. During the operational phase such damage mainly relate to the road surface and access, spill or an explosion, which is very unlikely. In addition, there are limited utilities in the vicinity of the erf. Any damage caused to existing infrastructure and services supply like roads and power line may result in a break in service delivery.

**Desired Outcome:** No impact on utilities and infrastructure.

#### **Actions**

##### **Prevention:**

- ◆ Appointing qualified and reputable contractors is essential.
- ◆ The contractor must determine exactly where amenities and pipelines are situated before construction commences (utility clearance e.g. ground penetrating radar surveys).
- ◆ Liaison with the suppliers of services is essential.

##### **Mitigation:**

- ◆ Emergency procedures for corrective action available on file.

##### **Responsible Body:**

- ◆ Proponent
- ◆ Contractors

##### **Data Sources and Monitoring:**

- ◆ A bi-annual report should be compiled of all incidents that occurred and corrective action taken.

#### **4.1.16 Cumulative Impact**

Possible cumulative impacts associated with the construction and operational phase include increased traffic, dust and noise in the area.

**Desired Outcome:** To minimise all cumulative impacts associated with the facility.

#### **Actions**

##### **Mitigation:**

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

##### **Responsible Body:**

- ◆ Proponent

##### **Data Sources and Monitoring:**

- ◆ Reviewing bi-annual summary reports based on all other impacts will give an overall assessment of the cumulative impacts of the construction and operational phases.

#### **4.2 DECOMMISSIONING AND REHABILITATION**

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

### **5 CONCLUSION**

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The EMP should be used as an on-site reference document for all the construction and operational activities. Parties responsible for transgression of the EMP should be held responsible for any rehabilitation that may need to be undertaken. The Proponent should use/develop their own in-house safety, health and environmental policies and standards in conjunction with the EMP. It is imperative that all construction and operational personnel are taught the contents of these documents to ensure better environmental practises all round.