



TEL.: (+264-61) 257411 ♦ FAX.: (+264) 88626368
CELL.: (+264-81) 1220082
PO BOX 11073 ♦ WINDHOEK ♦ NAMIBIA
E-MAIL: gpt@thenamib.com

**Proof of Wesco Waste Management's Waste Oil Storage, Handling and Refining
Consultation : Operations on Erf 1302, in Walvis Bay**

Please note that the Proof of Consultation for the Wesco Waste Management's Waste Oil Storage, Handling and Refining Operations on Erf 1302, in Walvis Bay forms part of the EIA Scoping Report and can be found from page 79 of the report.

Additional comments on the report is attached herewith..

Thank you in advance.

Sincerely,
Geo Pollution Technologies

IAP Comments and response related to the Environmental Assessment Report

Item	Comment / Question	Response
Comments Received From R Burger - Atlantic Industrial Trading CC (AIT)		
1	<p>Refer to: Government Gazette 5740 – Public and Environmental Health Act, 2015 Part 2 Page 10 : Powers and Function of Local Authorities with regards to public and environmental health issues: (2) every local authority must take the necessary and reasonable practicable measures to (b) prevent the occurrence within its local authority area of (i) a health nuisance (ii) an offensive condition or (iv) other condition which could be harmful or dangerous to a person within its local authority area or the local authority area of another local authority.</p> <p>Comment / Question Contravention of our Basic Human Rights as Namibian Citizens</p>	<p>Comment Noted</p>
2	<p>Refer to: Labour Act 11 of 2007 Chapter 4 Page 44-46 Health, Safety and Welfare of Employees Part A. Rights and Duties of employers and employees Employer’s duties to employees. 39.(1) Every employer or person in charge of premises where employees are employed must, without charge to employees – (a) provide a working environment that is (i) safe; (ii) is without risk to the health of employees. Employer’s duties to persons other than employees 40(1) Every employer must conduct its business operations on its premises in a manner that, as far as is reasonably practicable, persons who are not employed of that employer are not exposed to the risk of their safety or health.</p> <p>Comment / Question Our duties towards our employees, ourselves and our customers are out of our hands.</p>	<p>Comment Noted</p>
3	<p>Refer to: EAS report – Public Consultation Comments</p>	<p>3(a) Consultation with the local municipality was conducted and minutes taken of such meeting. GPT employees went to AIT to deliver notification and information about the project in terms of</p>

Item	Comment / Question	Response
4	<p>(a) Reference is made to a meeting that was held with the local municipality and some neighbouring parties who received background information documents. We were never included in this and we have never received and background information regarding the types of information.</p> <p>(b) Table 8.1 project communicative activity Page 21.</p> <p>Visit to all neighbours explaining proposed processes and operations rot be conducted on erf 1302 (1320). Consent letter issued by neighbours.</p> <p>This never happened. Willie Greyvenstein from Wesco Group contacted us, requesting a consent letter. Our initial responses was against signing thereof. Willie then informed us that they have already received approval for the site from the municipality and all relevant certificates will be transferred to the new site. They, however still needed our signed consent.</p> <p>General – Important</p> <p>Comments</p> <p>We Atlantic industrial trading, did not sign the consent form to give permission for a noxious industry next door to us.</p> <p>The environmental assessment scoping report continually refers to the dire effect of the toxic gasses / vapours and warns about the health, safety, air pollution, fire. Etc, issues and the harmful impact thereof. Regarding the continual referring to the dire effects, everybody mentioned in number 4 below, is waiting for the approval of this EIA report to issue a legal operations license.</p> <p>(a) It is stated in the Environmental Assessment Scoping Report that Wesco Waste is operating illegally. Despite that, they have been allowed to operate on the new site for the last 3-4 months, without any approved certificate from authorities.</p> <p>(b) Wesco waste have been established 38 years ago, and is operating without toxic waste / stack emissions preventable systems in place. We have been complaining about the toxic gasses / vapour for 3-4 months. We, also contact and inform Mark Nangoro on a regular basis.</p> <p>(c) Operations, on the new site started and are continuing without any gasses / vapours Health preventable systems and precautions.</p> <p>(d) The adverse effect and impact, on inhaling these gasses / vapours, that we experience on a daily basis has no influence on any of the decision makers (Directorate of Environmental Affairs, Walvis Bay Municipality, environmental consultant, Wesco Waste Management personnel) who are working from the safety of their offices away from the site. The urgency of our continuous reporting has no impact on them.</p> <p>(e) The environmental assessment scoping report is referring to the incorrect erf number.</p>	<p>environmental assessment process. Mrs Linda Burger signed for the information provided as per Appendix C of the report.</p> <p>3(b) Table updated to reflect that consent was requested by the Proponent from neighbouring parties.</p> <p>All comments noted. Typos related to erf number corrected.</p>

Item	Comment / Question	Response
1	<p>Comments Received From Jingwen Tao - Atlantic Industrial Trading CC</p> <p>Refer to : Pg.5 Executive summary, paragraph 3</p> <p>Questions</p> <p>1.1 It is recommended to do regular monitoring. Monitor by who? The Proponent itself? Or third party? And how often? If different batches of oil are refined everyday, how to define which batch oil is more toxic or nontoxic than the others?</p> <p>1.2 If it's only a recommendation, but not compulsory, what happens if there is no monitoring done at all? According to the article below, fugitive leaks at a refinery is a major emission source, how and who is and will monitor the system? https://www.sciencedirect.com/</p>	<p>1.1 As mentioned in the report, the monitoring schedule should be informed by the requirements of the noxious industry consent use. These should be in line with the World Health Organisations standards.</p> <p>1.2 Monitoring proposed in the report will become part of the environmental clearance certificate (ECC) requirements. Biannual monitoring reports must be submitted to the environmental commissioner.</p>
2	<p>Refer to: Pg.33 Item 9.4</p> <p>Questions</p> <p>2.1 Do LFO and HFO generate the same gases? Why only mention LFO in this part?</p> <p>2.2 What harm do we expect from the unknown substances in various sources?</p>	<p>2.1 Only LFO will be burnt in the boiler for heating purposes. HFO is only produced and not burnt.</p> <p>2.2 Air quality testing will inform.</p>
3	<p>Refer to: Appendix B</p> <p>Questions</p> <p>3.1 Why is it mentioned as concerns in the report, but didn't include Benzene, VOCs etc. in the test report? Benzopyrene, which is a common element generated from burning. According to the article from Science, there is evidence that it causes skin, lung and bladder cancer in humans and in animals. It stays on lungs for a long term can cause lung cancer. And if the density in air adds 0.1µg/m³, the chance of lung cancer increases 5%. The test data in the Occupation Hygiene Report of April 2022 is 132 times over the limits.</p> <p>3.2 Appendix B is only a system set up by the Proponent as a purification system. How and who would give approval and verify if it's sufficient or not?</p> <p>3.4 Currently one of the chimneys has been taken off, the gases go to the scrubber, but still it releases gasses and smoke, for sure it is not a closed system. And people still feel dizziness,</p>	<p>3.1 The air quality report was not commissioned as part of the environmental assessment. The environmental consultant did not inform or advise on the decision to conduct the report which was commissioned by the Proponent in an effort to comply with municipal requirements. There was no direct requirement in the initial monitoring. However, these components will be included in future monitoring.</p> <p>3.2 If the system functions well and monitored results indicate emissions lower than the requirement, then the system may be adopted. However, if not functioning, the system will have to be improved upon</p>

Item	Comment / Question	Response
	<p>headache, nausea etc, what are in that smokes? Even strong smoke tastes left in tongues. What are in those gases?</p>	<p>or replaced. The system was designed by the Proponent. 3.4 Future monitoring as proposed in the EMP will provide information related to compounds of concern.</p>
4	<p>Refer to: Pg.17 Comment I cannot agree that this is a final mitigation measurement. Cheng et al. [38], USEPA [39], and Lewis et al. [40] reported that the volatile organic compounds can initiate throat, nose, and eye irritation, headaches, breath shortness, skin problems, fatigue, dizziness, and nausea. Elevated levels or long-time exposures may result in lung irritation, kidney impairment, liver impairment, cancer as well as central nervous system damage. Above mentioned 9 symptoms, at least 6 already shown in the neighbourhood in a very short period. According to what standard this can be accepted? Not only human beings, the surrounding business also include sugar and maize storage processing / storage facilities, who and how can one make sure the food factories, which provide to the whole country are in a safe environment?</p>	<p>Air quality standards and requirements to be stipulated by the noxious industry consent use which is to be provided by the local municipality. These should be in line with the World Health Organisation's requirements or equivalent – as mentioned in the environmental assessment.</p>
5	<p>Refer to: Pg.21 Comment It says Namibia doesn't have a specific legislation for air quality control, but does question 4 mentioned can be accepted by WHO, IFC, EHS or UN? What does the Municipality consider about this issue? Is the Municipality allowing everything and anything to be released in the surrounding areas? Only because there is no air quality legislation, is the municipality allowing toxic gases just like this to put normal working people's health and food industry for the whole country in danger? Since Walvis Bay is planning to be an industrial hub, including for noxious industries, should they not start planning to have regulations (nationally or on local government level) that has some standards for air quality? This would greatly help once these industries are set up, that they know what standards they need to maintain to operate in Walvis Bay.</p>	<p>Comment Noted. Comment to be addressed to the local municipality.</p>
6	<p>Refer to: Pg. 23</p>	<p>6.1 Comment Noted.</p>

Item	Comment / Question	Response
	<p>Comment / Question</p> <p>6.1 Is the Proponent supposed to be located at Farm 58? Is the Municipality not in a sense admitting that noxious industries should be located outside of the town because it is perhaps dangerous to the public? The Municipality must prioritise the development of Farm 58 for noxious industries to avoid the frustration experienced by AIT staff. It is not fair towards normal businesses to be so close to noxious industries then.</p> <p>6.2 Does the consent letter inform people who give consent that there are harmful emissions just a few meters away? Without knowing harms in questions 4, without ECC being granted, which means people do not have a basic and full knowledge about contents in consent letters. Is the consent letter valid then? When you give consent, are you giving consent to be exposed to harmful emissions and giving consent to harm your business? This cannot be sensible at all. Consent is not a blank cheque to do what you want.</p>	<p>Comment to be addressed to the local municipality which deals with municipal zoning.</p> <p>6.2 Comment Noted.</p> <p>Comment to be addressed to the local municipality which deals with consent use applications.</p>
7	<p>Refer to: Pg. 30.</p> <p>Comment / Question</p> <p>EIA was advised on 3 May 2022, consent was on 13 October 2021, is this logical? Without knowing about EIA, what was the consent for?</p>	<p>The environmental assessment process was not in any way involved with the consent requested and provided between the proponent and IAP. The environmental assessment only provided notification letters to neighbours and no consent, in terms of the EIA process was required.</p> <p>Comment Noted.</p>
8	<p>Refer to: Pg. 31 first paragraph</p> <p>Comment</p> <p>Human error maybe once or twice, complaints are happening on a daily basis.</p>	<p>Updated operating procedures have been developed to include non-conformance actions when the system is not activated.</p> <p>Comment Noted.</p>
9	<p>Refer to: Pg. 44</p> <p>Question</p> <p>Why hydrocarbons, volatiles and particulates, PM10 PM2.5, VOCs etc. are harmful, but not included in the test report?</p>	<p>The air quality report was not commissioned as part of the environmental assessment. The environmental consultant did not inform or advise on the decision to conduct the report which was commissioned by the Proponent in an effort to comply with municipal requirements. There was no direct requirement in the initial monitoring.</p>

Item	Comment / Question	Response
10	<p>Question: What is "Draft" and "Effic" in the test report?</p>	<p>However, these components will be included in future monitoring. Draft = Flow rate Effic = Efficiency</p>
11	<p>Refer to: Pg.45</p> <p>Question: How many monitoring cycles already? Monitored by whom?</p>	<p>Air quality standards and requirements to be stipulated by the noxious industry consent use which is to be provided by the local municipality. Monitoring to be conducted by the Proponent.</p>
12	<p>Refer to: Pg.81</p> <p>Comment / Question I don't understand this test report. I'll use SO₂ as an example only. Test result says 66ppm,</p> <p>12.1 According to Namibian Legislation on Pg.79, (TWA-average over 8 hours, STEL - Short Term Exposure Limit) Limit over 8 hours is only 2ppm, short term is 5ppm. Isn't the test result, 66ppm is 33 times above the limit? On pg.81 test report for boiler, the time is 9:57, I assume it's the starting test time, but not how long the test lasts, and pg.82 Heater tank test time is 10:02. So I guess the test maximum lasted 5mins. So the 66ppm is way above the limit.</p> <p>12.2 And, look at the guideline from WHO at Pg.78, maximum in 10 mins is 500µ/m³, 1 PPM = 1,000 microgram per cubic meter So even only in 5mins tested period, 66ppm=66,000µ/m³, which is 132 times more than the limit 500µ/m³. Please correct me if I understand wrongly. But according to my questions 3.2, how far are we away from cancer? If there are other elements that need to be calculated into this evaluation, why is it not included in the report? Is the report valid then?</p> <p>12.3 In this test report, since it's a once off test, it can only be one batch of oil. Was VOCs not occurring in this batch of oil? Why is it not included in this report? Tested only one batch of oil, what about the other batch of oils, what is inside of those untested oil?</p>	<p>The air quality report was not commissioned as part of the environmental assessment. The environmental consultant did not inform or advise on the decision to conduct the report which was commissioned by the Proponent in an effort to comply with municipal requirements.</p> <p>12.1 The reference of 66pp, when converted to mg/Nm³ is 172.924 mg/Nm³. This is lower than the IFC standards of 2000 mg/Nm³ (https://teeing.com/en/library/tools/ppm-mg3-converter).</p> <p>12.2 The reference of 66pp, when converted to mg/Nm³ is 172.924 mg/Nm³. This is lower than the IFC standards of 2000 mg/Nm³ (https://teeing.com/en/library/tools/ppm-mg3-converter).</p> <p>12.3 The purpose of the initial air quality assessment was to determine base line conditions of the emissions. Based on the</p>

Item	Comment / Question	Response
13	<p>Comment / Question</p> <p>According to the Environmental Health Act, one is not allowed to be a nuisance to your neighbours. AIT experiences the emission of toxic gases almost every day. And it damages health, possibly on a permanent level at the same rate. How does one change the situation of being harmed on a daily basis? And how long will it take?</p>	<p>The local authority has the duty of care to investigate public health concerns as per the Environmental Health Act. The local authority further has the authority to intervene should any harmful activities be proven to determinately affect the public or neighbouring parties. Complaints may also be submitted to the Ministry of Environment, Forestry and Tourism.</p>
14	<p>Question</p> <p>Does the Proponent have a health certificate? If they do, is the health certificate being granted to this new site on 4th street East, or is it a certificate they had before and being transferred to this new site? Is the transfer valid?</p>	<p>The Proponent will have to comply to all requirements of the Labour Act.</p>
<p>Comments Received From Gys Burger - Atlantic Industrial Trading CC</p>		
1	<p>Refer to: Page 13 Implications and Impacts</p> <p>“The site is situated in an area zoned for industrial purposes. No rezoning is therefore considered for the current activities related to this project. Road access is suitable for this project. Farm 58 has been defined for a noxious industry, however the development has not been realised. The Proponent has registered the noxious use for the property. Consent use may only be realised once an ECC is granted.”</p> <p>Question: How can consent use be granted after the industry has already started its activities as a noxious industry? Is this not going about the wrong way?</p>	<p>No consent has been provided by the local municipality as per investigations by the environmental consultant. Consent use applications are not part of the environmental assessment process. However it was noted that such an application was lodged in May 2022 by the Proponent, after continued consultation between the Proponent and local municipality.</p>
2	<p>Refer to: Page 21</p> <p>Further activities include raising the stack height and then completely removing the stack as a mitigation measures (see section 5). These initial measures did not resolve the concern. The installation of scrubbers reduced emissions considerably however, continues complaints were</p>	<p>Updated operating procedures have been developed to include non-conformance actions when the system is not activated.</p>

Item	Comment / Question	Response
	<p>received. It was noted that the Proponent indicated that due to human error, the purification system was not turned on at times.</p> <p>Question How can such a sensitive matter on emissions be allowed to operate on human error? Since these emissions have already caused great discomfort to the neighbours, should the neighbours just accept continued human error as the operations progress? Is there no way to automate these operations?</p>	
3	<p>Refer to: Page 23 During construction activities and operations, some traffic impacts may be experienced when trucks and delivery vehicles access the site on 4th Street East. Access to the storage area and re-refining plant (4th Street East) may result in some traffic impacts due to the traffic volumes experienced in the street. Trucks parked outside the facility may block the road as well as entrances to other facilities in the street. Some concerns were raised by neighbouring properties who mentioned that due to congestion in the cul-de-sac, heavy motor vehicles have used their property as a turn circle.</p> <p>Question How can the traffic impacts be resolved? Customers may have trouble entering AIT for example.</p>	<p>Entrance management should be employed by the Proponent, however the greater traffic concern for the street should be resolved by the local municipality since there are numerous businesses that have HMV utilising the street.</p>
4	<p>Refer to Page 23: LFO is combusted in boilers. Burning of the LFO creates gasses (carbon monoxide (CO), carbon dioxide (CO₂), sulfur dioxide (SO₂), nitrogen dioxide (NO_x), nitric oxide (N₂O)) and volatile organic compounds and hydrocarbons (HCs). These elements are released into the atmosphere through a stacks on site and are known pollutant elements, some of which are greenhouse gasses. Waste oil collected from various sources may contain unknown substances which may be released when the oil is heated for the re-refining process. Various volatile components may be released through the heating stack. A number of control measures have been considered for emission reduction and management. All emissions from the heating tanks pass through an air scrubber purification system which aims to reduce harmful emissions. In the absence of air quality emissions standards for Namibia, the Proponent should adopt the emissions standards as advocated by the World Bank and International Finance Corporation since Namibia is a signatory to various climate change conventions.</p> <p>Question:</p>	<p>The air quality report suggested that continuous monitoring be conducted. However monitoring to be scheduled as per the requirements of the noxious industry requirements (in the municipal consent use provided). Continuous monitoring is usually an ongoing, automated process which can be obtained through an installed probe.</p>

Item	Comment / Question	Response
5	<p>How will adherence to WHO standards be monitored. Is continued monitoring part of the requirements? I have some concern that when a time specific test is conducted, the Proponent can put their best foot forward to make the results look as good as possible. Even if there is no such intent, annual or monthly tests cannot cover the continual exposure conditions and day to day and even sub-daily variance.</p> <p>Refer to: Page 26</p> <ul style="list-style-type: none"> • 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. <p>If one has not already been established, establish and maintain a fund for future ecological restoration of the project site should a spill occur or project activities cease and the site is decommissioned and environmental restoration or pollution remediation is required.</p> <p>Establish and / or maintain a reporting system to report on aspects of construction activities, operations and decommissioning as outlined in the EMP.</p> <p>Keep proof of monitoring report submissions on file (submission every six month) for submission with environmental clearance certificate renewal applications where needed.</p> <p>Appoint a specialist environmental consultant to update the EIA and EMP and apply for renewal of the environmental clearance certificate prior to expiry</p> <p>Question How do we know the EMP is being adhered to? Are the records public?</p>	<p>Bi-annual reports related to the implementation of the EMP are required by the MEFT. These reports are not made public.</p>
6	<p>Refer to: Page 31 same section as in point 5.</p> <p>Question Traffic impacts. This could become problematic. Again, will the bi-annual report / resolutions be communicated to the affected parties, say AIT? I understand that there are already traffic flow problems that may impact customer access to AIT.</p>	<p>Bi-annual reports related to the implementation of the EMP are required by the MEFT. These reports are not made public. Traffic concerns should also be submitted to the local municipality.</p>
7	<p>Refer to: Page 33 Fire risk</p> <p>Question</p>	<p>The Proponent is required to ensure all fuel storage infrastructure adhere to SANS standards which include considerations to fire fighting. However, no fire have been</p>

Item	Comment / Question	Response
8	<p>Fire risk. I am somewhat concerned about fire risk. Does the Proponent have any experience with fires before. It would be encouraging to know that in their operations over the years, that they have not had on-site fires or were able to contain them easily / quickly.</p> <p>Refer to: Page 34 and 35</p> <p>Comment / Question Air quality impacts. Given the experiences with AIT since the Proponent started operations, this section leaves me somewhat unsatisfied. Staff at AIT have already experienced serious air quality concerns, such as strong smells and nausea. Clearly there is a problem. The recommended actions put a lot of onus on the Proponent. But to use a sports metaphor, you cannot be a player and a referee. Given the experiences of staff at AIT, I feel somewhat uncomfortable having all responsibility of monitoring and recording of problems on the Proponent, especially if the information, meetings and mitigation steps made public. The emissions and smells already have an impact on AIT and its a problem that has effects beyond the property of the Proponent.</p>	<p>experienced since the operations were initiated (38 years ago).</p> <p>The mitigation measures in the report are set to be part of the EMP which needs to be approved by the MEFT. Monitoring requirements as per the noxious industry's consent use should be provided by the municipality. Alternatively continuous monitoring, as proposed in the air quality report should be adopted.</p>
9	<p>Refer to: Page 34 and 35</p> <p>Regular monitoring of emissions from both stacks for particulate matter, sulfur dioxide, nitrogen oxide and volatile organic compounds. Monitoring schedule to be in line with noxious industry consent use.</p> <p>Question Please define "regular monitoring". How will we know that the regular monitoring will be maintained, what the results are and if its line with standards (WHO etc.)?</p>	<p>Scheduling of monitoring requirement to be in line with the noxious industry consent use, which should, as a minimum include WHO standards and frequency intervals.</p>
10	<p>Refer to: Page 35 Data Sources and Monitoring</p> <p>Question How do we know these will be maintained? What steps can be taken if these are not maintained?</p>	<p>Bi-annual reports related to the implementation of the EMP are required by the MEFT. IAPs may provide complaints and concerns to the local municipality as well as to the MEFT.</p>
11	<p>Refer to: Page 34 and 35 Prevention actions.</p> <p>Question How will this be monitored (that the Proponent adheres to these actions)?</p>	<p>Bi-annual reports related to the implementation of the EMP are required by the MEFT. IAPs may provide complaints and concerns to the local municipality as well as to the MEFT.</p>

Item	Comment / Question	Response
12	<p>Refer to: Page 37 “In the event of effluent discharge not meeting municipal standards, the effluent should be treated prior to release into the municipal system.”</p> <p>Question Waste production: How can effluent standards be known without regular monitoring? What incentive does the Proponent have to monitor effluent discharge? Who will be checking compliance?</p>	<p>Comment Noted. Comment to be addressed to the local municipality which deals with municipal effluent discharge and who has developed standards related thereto.</p>
13	<p>Refer to: Page 40 Mitigation</p> <p>Question Groundwater contamination: What incentive does the Proponent have to report spillages? If this will result in penalties or some form of negative consequence, would the Proponent not opt to not report at all?</p>	<p>Spill reporting is a requirement of law and non-adherence thereto is a criminal offence.</p>
14	<p>Refer to: Page 40</p> <p>Question I suppose groundwater contamination could have an impact on neighbouring properties, such as AIT. From the information in the report (hope I read right), some of the waste products and oils could come to the surface. This could result in an unsightly work area, may smell bad. I obviously have concerns on how this can be avoided.</p>	<p>Comment noted</p>
15	<p>Refer to: Page 40 and 41 Data Sources and Monitoring</p> <p>Question Who will monitor? Who will ensure that the monitoring happens? Will the spillage report be public? As said before, its hard to be your own referee, especially if you stand to lose from your “refereeing”. How is the Proponent motivated to record and report spillages and contamination?</p>	<p>Spill reporting is a requirement of law and non-adherence thereto is a criminal offence.</p>
16	<p>Refer to: Page 43 Mitigation, Responsible Body and Data sources and monitoring</p>	<p>Bi-annual reports related to the implementation of the EMP are required by the MEFT. Should MEFT stipulate in</p>

Item	Comment / Question	Response
17	<p>Question Cumulative impact: Who will review the bi-annual reports? Are these reports public? Can the IAPs such as myself gain access to them?</p> <p>Refer to: Page 44 Environmental Management System</p> <p>Question When I read “The Proponent could...”, I read “The Proponent does not need to...”. What incentive does the proponent have to implement the EMS? Otherwise, this is just a suggestion that will probably not be done. Is the implementation of the EMP optional?</p>	<p>the conditions of the ECC that such reports be made public, or it be a municipal requirement etc, then IAP may view them.</p> <p>The implementation of the EMP is mandatory as the ECC will be based on the implementation thereof.</p>
18	<p>Refer to: Page 45</p> <p>Question I am obviously concerned about the continued adherence to the EMP. How will we know it is being followed and adhered to? How do we know complaints will be recorded, discussed and mitigation followed? If it just remains a document, then its kind of useless. Current emissions and smells from the site have already had a negative impact on AIT. If drastic action is not taken by the Proponent, this would just continue to cause negative impacts, which I cannot be in favour of or support. We can also not support an EMP where the Proponent is the key referee of itself, since it stands to lose if it rules against itself. Which authority will monitor adherence to the EMP? How can the neighbours, such as AIT, partake in the monitoring and evaluation of the EMP?</p>	<p>If monitoring reports are not submitted, the ECC, which is valid for three years may not be renewed unless MEFT can provide a reason for such renewal which will be based on non-compliance to the EMA requirements.</p>
23	<p>Refer to: Page 85 Should the Directorate of Environmental Affairs (DEA) find that the impacts and related mitigation measures, which have been proposed in this report, are acceptable, an environmental clearance certificate may be granted to Wesco Waste Management. The environmental clearance certificate issued, based on this document, will render it a legally binding document which should be adhered to. Focus should be placed on section 10, which includes an EMP for this project. It should be noted that the assessment process’s aim is not to stop the activity, or any of its components, but to rather determine its impact and guide sustainable and responsible development as per the spirit of the EMA.</p>	<p>Mitigation measures proposed in the report have not been adopted by the Proponent. Neither has the local authority provided requirements for consent use for noxious industries. Therefore the efficacy will only be visible once all mitigation and monitoring measures have been implemented.</p>

Item	Comment / Question	Response
24	<p>Comment: The efficacy of the mitigation measures are clearly not working. AIT staff still experience emissions and smells that are uncomfortable at best, and irritating, nauseating and disorientating at worst. If this is the extent of mitigation measures, its not good enough.</p> <p>Refer to: Page 86</p> <p>5. Comment noted.</p> <p>a) Only if so required by the Local Municipality investigating a health nuisance concern or if stipulated by any other governing body such as the Ministry of Environment, Forestry and Tourism.</p> <p>b) Comment noted.</p> <p>c) Comment noted.</p> <p>d) Monitoring frequency to be guided by municipal requirements for noxious industries (as per related consent use application submitted by the Proponent).</p> <p>Comment / Question Then we recommend monitoring at higher time frequency, even continual if certain measurements allow it. Oil types may vary and give off different types of emissions. Monitoring can show the variance. A monthly test based on a 24 hour sample can easily be set-up by the Proponent to favour the outcome. If I arrange a third party to do tests at my expense, I would put my best foot forward when he comes. How can this bias be avoided? This is actually what is quoted on the front page of the Occupation Hygiene Report of April 2022: "If you cannot measure it, you cannot control it."</p>	<p>Continual monitoring is automated and would consider all batched of oil.</p>
25	<p>Refer to: Page 85</p> <p>Comment made by the environmental section of the Walvis Bay Municipality stating that "they do not want to stop operations".</p> <p>Comment / Question For AIT employees, what comfort do we have to know that the activities are illegal but unable to be stopped. This makes the entire process, including public consultation, a bit useless. Given that since May, work conditions at AIT have not been great with emissions and smells from the Proponent's site, mitigation measures have not been effective to improve conditions. It would be good to know from the Municipality that if something is not right and if something is negatively affecting both the business activities and health of a neighbouring property, that the Municipality would take action.</p>	<p>Comment to be addressed to the local municipality</p>

Item	Comment / Question	Response
	<p>Can the Municipality still maintain their recommendation to the environmental commissioner to give an ECC and not stop operations given that mitigation steps up to date have not improved? I feel that once an ECC is granted, AIT employees have very little recourse but to hope for the best, which does not instill much confidence in the system as a whole.</p>	



Walvis Bay, Namibia
5th Street East 251
P. O. Box 555, Walvis Bay, Namibia
Registered office: Tel: +264-64-215800
Fax: +264-64-209117
www.kraatz.com.na

Geo Pollution Technologies (Pty) Ltd
PO Box 11073
Windhoek

20 July 2022

RE: QUZETTE BOSMAN

Good day

RE: WESCO REFINING PROCESS

We would like to raise our concerns regarding the refining process and smokestack from Wesco that was relocated to be behind our premisses.


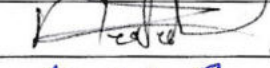
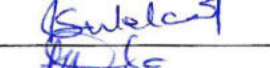



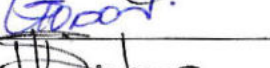
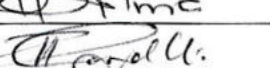
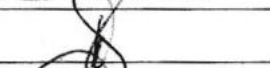
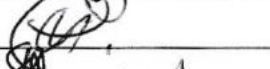



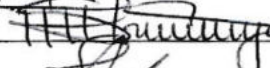


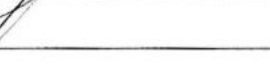


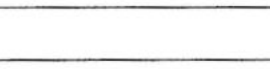
Our employees have complained about nauseousness / constant headaches / dizziness / burning of nose and throat, when inhaling the vapours and gasses from the refining process.

We would hereby recommend that they should find another premisses, at a remote location, not surrounded by other companies and or the public, to refine the oil. On a long-term basis, this can have an unnecessary bad impact on our health, since this is becoming a health hazard.

Hereby please find signatures from our employees, that are acknowledging that the gasses and vapours are effecting their health.

Kind Regards

Nikki Altmann
Health, Safety and Environmental Officer
Tel: 081 478 2458

<u>DATE</u>	<u>NAME & SURNAME</u>	<u>DEPARTMENT</u>	<u>SIGNATURE</u>
20/07/22	JANINE SMITH	FINANCE	
20/07/22	Nicolas Wessling	Marketing	
20/07/22	Elize Alukelous	Deloitte - Auditors	
20/07/22	JANE KARUHUMBA	FINANCE	
20/07/22	CHARIENE DEKES	Finance	
20/07/22	SILKIE BÖHMNER	FINANCE	
20/07/22	Camion Nash	Human Capital	
20-07-22	Sandra GOROOT	HUMAN CAPITAL	
20-07-22	Hilma Nanglo	Finance	
20-07-22	Roland Randall	HR	
20-07-22	JACQUES BEZUIDENHOUT	FINANCE	
20-07-22	LUCKY MAKWAHONGA	FINANCE	
"	Jerry van Niech	M/C	
20/07/22	SOTTI CRUKAMP	marketing	
20/07/22	ANDREAS PINDEKANI	WORK SHOP	
20/07/22	Chantelle Philander	HR.	
20/07/22	Fina Shuyya	Estimation	
20/07/22	Steven Swartz	work shop	
20-07/22	Quinn. Mapple	work shop	
20/07/22	K. KATHEK	HR.	

Authority Comments and response related to the Environmental Assessment Report

Item	Comment / Question	Response
Comments Received From Walvis Bay Municipality: Department of Water, Waste and Environmental Management		
1	Please give a background in your scoping report as to what necessitated Wesco to Move to the new property and why the EIA is being done retrospectively.	This was detailed in the report on page 84. GPT advised the Proponent, in writing, that an EIA is required. The Proponent, after verbal communications between the Proponent and local municipality, followed another course of action. It is understood that the local municipality advised that an amendment application (amendment of the Proponent's existing EMP and ECC for their previous operations) should be conducted by the Proponent. The amendment was submitted. However, only after a consultation meeting with the Department of Environmental and Forestry, was the Proponent informed by the environmental commissioner that a new EIA is required.
2	Table 6. -1 Please look at the requirement for Business registration and operation in terms of our local by – laws	Local by-laws relevant to the environmental assessment are included in Table 6.2. The Proponent was in possession of a business registration certificate, issued by the municipality for all previous years of operations as well as when they moved. The municipality approved all building plans to move to the new site. A copy of the previous business registration is attached to these comments and responses.
3	Recycling plants/Factories/ Dangerous Machines needs Approval and Registration, in terms of the Labour Act – does this oil recycling plant need approval from the Ministry of Labour in terms of Safety and Health of Employees Regulations ? if yes Please provide this approval from the Ministry of Labour.	The Proponent has a certificate for the registration of a factory for previous site and is communicating with the Labour department to have the registration moved to the new premises.
4	Please arrange a meeting with the local Occupational Safety and Health Inspectors and attach minutes of your meeting to the Scoping report. They are the key and are also the regulators for Health and Safety seeing that there are endless complains from the neighbours	Please see the minutes attached to this issues and responses report.
5	Please design and include a form for registration of complains and actions taken - for record purposes and uniformity	
6	It would be nice to include original email as received from the people complaining rather than a summarised version of the issue raised	Current format of the issues and Reponses report is as per EMA regulations – which requires an issues and responses table. Care is

Item	Comment / Question	Response
7	<p>Lastly – was this scoping report shared with all the people who attended the EIA consultation meeting with Wikus here at the Municipality?</p>	<p>taken not to include private contact details which are visible on emails, since the document is published on the internet. All records and complaints received are kept on file, if so required by MEFT.</p> <p>The report was made available to all departments present – Town Planning, Environmental and Health.</p> <p>'bbotha@walvisbaycc.org.na'; 'lhuselmann@walvisbaycc.org.na'; 'jandreas@walvisbaycc.org.na'; 'duushona@walvisbaycc.org.na'; 'namutenya@walvisbaycc.org.na'; 'lkahona@walvisbaycc.org.na'; 'kawanaromanus@yahoo.com'; 'dbasson@walvisbaycc.org.na'</p>
<p>Comments Received From Walvis Bay Municipality: Department of Roads and Building Control, Municipality of Walvis Bay</p>		
1	<p>Refer to: 5.2 (p 6)</p> <p>Thereafter operations were temporarily restricted to reduced hours, in an effort to reduce emissions.</p> <p>Question: What are the reduced hours? It is recommended that the operator consider doing the actual “recycling” activities after normal office hours to reduce the emissions on adjacent offices. The EIA should therefore assess if the change to the recycling operations (to after office hours) will minimize air pollution associated impacts on adjacent neighbours or not.</p>	<p>No assessment required during these mitigation measures as it clearly did not work and more stringent measures were employed. Dilution (stack increase is not a solution) emissions reduction via an air purification system was the next step taken.</p>
2	<p>Refer to 5.2 (p 6)</p> <p>The original 11 m stack height was increased with two metres for a period of 14 days. However, the initiative proved insufficient as emissions continued to be carried onto neighbouring properties</p> <p>Question So, what is the sufficient height to reduce the emissions? The EIA/EMP must be clear on this and suggest the appropriate height. Approval may be required from Aviation (consultant to also obtain comments from Aviation regarding this matter).</p>	<p>An elevated stack will not help much in no wind conditions. Stack height calculations is not a “one size fits all” solution and may be calculated as per IFC guidelines for air emissions and ambient air quality. The aim is however not to just dilute emissions but to reduce them as per the installation of the air purification system. The heating stack has been removed to direct all emissions through the air purification system.</p>
3	<p>Refer to 5.2 (p.7)</p> <p>Installation of an industrial air scrubbing purification system.</p> <p>Question</p>	<p>Additional mitigation measures have been proposed in the scoping report as well as air quality report. In Section 10.1.9 it states that “Monitoring schedule to be in line with noxious industry consent use.” Consent use should be provided by the local municipality.</p>

Item	Comment / Question	Response
4	<p>This also proves to be ineffective, because the adjacent property owners and tenants are still complaining about emissions from WESCO's recycling operations.</p> <p>Refer to Table 6-2 (p.8)</p> <p>Table 6-2 Municipal by-laws, guidelines and regulations</p> <p>Comment</p> <p>Please add the Walvis Bay Town Planning Scheme and assess it. Recycling and refining operations are considered as "Noxious Industry". The operator needs to obtain Council's consent prior to the operations. The current operations contradict the Town Planning Scheme.</p>	<p>Such an application was lodged with the municipality on 12 May 2022. The town planning procedure and related consultation and approval is not part of the EIA process as the regulations only pertain to rezoning applications. The Proponent was informed of the parameters for a consent use application at the time by the local municipality. Those parameters were completed and a subsequent application lodged. The proof of application submission is held by the Proponent.</p>
5	<p>Refer to Figure 7-1 (p.12)</p> <p>Figure 7-1 Walvis Bay Spatial Development Framework 2014 – 2030</p> <p>Comment</p> <p>Figure 7-1 is wrongly quoted as "Walvis Bay Spatial Development Framework" (SDF). The plan is not a SDF. Furthermore, the legend wrongly shows that the subject erf is a "Heavy Industrial" erf. The erf is "Industrial" not "Heavy Industrial"</p>	<p>Noted and updated.</p>
6	<p>Refer to p35:</p> <p>If emissions results indicate continued elevated values (for three monitoring cycles) the Proponent should employ additional air purification measures such as selective catalytic, or non-catalytic reduction systems and increasing of stack height as per good international industry practise for stack height.</p> <p>Comment</p> <p>Since the activities have been in operations (illegally), there should be enough data to justify that that the emissions are on elevated values or not. We are inundated with complaints from the neighbours regarding air pollution. It appears that such additional purification measures are already required at this instance and need to be already enforced right away.</p>	<p>Insufficient monitoring data is available</p>
7	<p>Refer to: p35</p> <p>Any complaints received regarding dust, fuel vapours or emissions should be recorded with notes on action taken to address concerns</p>	<p>All complaints provided to the environmental consultant have been included. Measures referred to here are measures which should be conducted by the Proponent as part of their EMP implementation.</p>

Item	Comment / Question	Response
	<p>Comment Complaints have been lodged on various occasions with the operator. Such complaints should also be documented in the EIA and the measures to address them should be proposed.</p>	
8	<p>Refer to: Appendix B Appendix B: Air scrubber purification system and air quality report</p> <p>Comment Such mitigation measures have not addressed air pollution. More alternative or stringent measures should be proposed and implemented prior to Council's approval of the consent for a noxious industry on the premises.</p>	<p>Mitigation measures have been proposed in the scoping report as well as air quality report. Implementation of these measures should be undertaken. In Section 10.1.9 it states that "Monitoring schedule to be in line with noxious industry consent use." Consent use should be provided by the local municipality and should as a minimum adhere to WHO and IFC guidelines as well as adherence to the Labour Act and related regulations.</p>

Walvis Bay



Municipality

REGISTRATION CERTIFICATE NO. 2012/2350

WESCO WASTE MANAGEMENT (PTY) LTD

is registered to carry on business as a

OIL RECYCLING AND TRADE - WASTE MANAGEMENT

in accordance with the Local Authority Act 2000 (Act 29 of 2000) and the General Health Regulations 1969 (GN121 of 1969)
Under the following conditions

Name of Owner: ANTON PRETORIUS

Name of Manager: J W GREYVENSTEIN

Business Address: P O BOX 157, WALVIS BAY, NAMIBIA, 13013

Street Address: BEN AMATHILA STREET, TUNACOR PREMISES, WALVIS BAY

Erf No: W1238

Receipt No.:
EFT

Date of Registration:
2021/05/20

Expiry Date:
2022/05/19

MUNICIPALITY OF WALVIS BAY
BUSINESS REGISTRATION OFFICE
D. DANIEL
21 MAY 2021
REGISTRATION OFFICER
ENVIRONMENTAL HEALTH SECTION

Please note: This certificate does not exempt the holder of obtaining a permit or any other document which may be required by law imposed by other ministers. Any violation of this certificate without the approval of the Registration Authority constitutes a criminal offence.

Walvis Bay



Municipality

REGISTRATION CERTIFICATE NO. 2012/2350

WESCO WASTE MANAGEMENT (PTY) LTD

is registered to carry on business as a

OIL RECYCLING AND TRADE - WASTE MANAGEMENT

in accordance with the Local Authority Act 2000 (Act 29 of 2000) and the General Health Regulations 1969 (GN121 of 1969)

Under the following conditions

Name of Owner: ANTON PRETORIUS
Name of Manager: J W GREYVENSTEIN
Business Address: P O BOX 157, WALVIS BAY, NAMIBIA, 13013
Street Address: 34, SECOND STREET EAST, WALVIS BAY
Erf No: W1238

Receipt No.:
90096939

Date of Registration:
2020/05/27

Expiry Date:
2021/05/26

MUNICIPALITY OF WALVIS BAY
BUSINESS REGISTRATION OFFICE
<i>D. Daniel</i> 7th JUN 2020
REGISTRATION OFFICER
ENVIRONMENTAL HEALTH SECTION
PRIVATE BAG 3017 TEL: 064 2015268

Please note: This certificate does not exempt the holder of obtaining a permit or any other document which may be required by law imposed by other ministries. Any alteration of this certificate without the approval of the Registration Authority constitutes a criminal offence.

Walvis Bay



Municipality

REGISTRATION CERTIFICATE NO. 2012/2350

WESCO WASTE MANAGEMENT (PTY) LTD

is registered to carry on business as a

OIL RECYCLING AND TRADE - WASTE MANAGEMENT

in accordance with the Local Authority Act 2000 (Act 29 of 2000) and the General Health Regulations 1969 (GN121 of 1969)

Under the following conditions

Name of Owner: ANTON PRETORIUS

Name of Manager: J W GREYVENSTEIN

Business Address: P O BOX 157, WALVIS BAY

Street Address: 34, SECOND STREET EAST, WALVIS BAY

Erf No: W4570

Receipt No.:
EFT

Date of Registration:
2019/04/10

Expiry Date:
2020/04/09

MLBrand

REGISTRATION OFFICER

Please note: This certificate does not exempt the holder of obtaining a permit or any other document which may be required by law imposed by other ministries. Any alteration of this certificate without the approval of the Registration Authority constitutes a criminal offence.

Walvis Bay



Municipality

REGISTRATION CERTIFICATE NO. 2012/2350

WESCO WASTE MANAGEMENT (PTY) LTD

is registered to carry on business as a

OIL RECYCLING AND TRADE - WASTE MANAGEMENT

in accordance with the Local Authority Act 2000 (Act 29 of 2000) and the General Health Regulations 1969 (GN121 of 1969)
Under the following conditions

Name of Owner: ANTON PRETORIUS
Name of Manager: J W GREYVENSTEIN
Business Address: P O BOX 157, WALVIS BAY
Street Address: 34, SECOND STREET EAST, WALVIS BAY
Erf No: W4570

Receipt No.:	Date of Registration:	Expiry Date:
EFT	2018/05/03	2019/05/02

M.L. Brand
REGISTRATION OFFICER

Please note: This certificate does not exempt the holder of obtaining a permit or any other document which may be required by law imposed by other ministries. Any alteration of this certificate without the approval of the Registration Authority constitutes a criminal offence.

As per meeting held at Wesco Waste Management depot at 11h00 on 15/07/2022. This meeting was requested by the Municipality of Walvis Bay to further understand the Air scrubbing purification system installed by Wesco Waste Management.

The following items were discussed during a walk through of the plant under full operation.

Operational procedures and processes were described to municipality representatives by WWM




Air Scrubbing purification systems was described to Walvis Bay municipality representatives

Operational temperature was verified

Walvis Bay municipality had enquired on the targeted emissions by the Air Scrubbing purification system.

WWM further described the system and highlighted that there is no targeted emission but rather all odours and emissions during process.

Walvis Bay municipality representatives had said that they can not advise or further instruct at this current time

Name	Body Represented	Position	Signature
Cameron Langenhoven	Wesco Waste Management	HSE Superintendent	
Mark Nangoro	Wesco Waste Management	Operations Manager	
Jesaya N Andreas	Municipality of Walvis Bay	Environmental health practitioner	
Nakasole Hosea	Municipality of Walvis Bay	Health Intern students	N/R
Haindongo Erika	Municipality of Walvis Bay	Health Intern students	N/R

