

**OPERATIONS OF NAMIBIA POST LTD'S CONSUMER FUEL
INSTALLATION IN WINDHOEK**

ENVIRONMENTAL MANAGEMENT PLAN



Prepared by:



Prepared for:



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| Project: | ENVIRONMENTAL MANAGEMENT PLAN FOR THE OPERATIONS OF NAMIBIA POST LTD'S CONSUMER FUEL INSTALLATION IN WINDHOEK |
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| Prepared for: | Namibia Post Ltd PO Box 287 Windhoek Namibia |
| Lead Consultant | Geo Pollution Technologies (Pty) Ltd PO Box 11073 Windhoek Namibia |
| Main Project Team | André Faul (Leader) (B.Sc. Zoology, Biochemistry); (B.Sc. (Hons) Zoology); (M.Sc. Conservation Ecology); (Ph.D. Medical Biosciences) Pierre Botha (B.Sc. Geology/Geography); (B.Sc. (Hons) Hydrology/Hydrogeology) Stefan Short |
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Table of Contents

| | | |
|----------|---|-----------|
| 1 | OBJECTIVES OF THE ENVIRONMENTAL MANAGEMENT PLAN..... | 1 |
| 2 | THE ENVIRONMENTAL MANAGEMENT PLAN | 1 |
| 2.1 | LAND USE, PLANNING, DESIGN, OPERATIONS – IDENTIFIED IMPACTS | 1 |
| 2.2 | LAND USE, PLANNING, DESIGN, OPERATIONS – MITIGATING MEASURES | 2 |
| 3 | THE IMPLEMENTATION OF THE ENVIRONMENTAL MANAGEMENT PLAN..... | 2 |
| 4 | CONCLUSIONS..... | 14 |
| 5 | REFERENCES | 14 |

List of Tables

| | | |
|----------|---|----|
| TABLE 1 | PLANNING FOR UPGRADES, OPERATIONS AND FUTURE DECOMMISSIONING OF THE PROJECT | 3 |
| TABLE 3. | THE OPERATIONAL PHASE..... | 5 |
| TABLE 4. | MAINTENANCE AND DECOMMISSIONING PHASE..... | 10 |

1 OBJECTIVES OF THE ENVIRONMENTAL MANAGEMENT PLAN

Namibia Post Ltd (the Proponent) requested Geo Pollution Technologies (Pty) Ltd to update the existing environmental management plan (EMP) for their consumer fuel installation on erf 8231, Voigts Street, Windhoek (Figure 1-1). The updated EMP will be submitted to the Ministry of Environment, Forestry and Tourism (MEFT) to renew their existing environmental clearance certificate (ECC) for the facility. The renewed ECC is required for continued operations of the consumer fuel installation which supplies fuel to vehicles in NamPost's fleet. The property is currently zoned for Government land use. Operations of the facility include filling of the underground storage tank with diesel from road transport tankers; dispensing of diesel to customers; tank dips and fuel volume reconciliation; and general operational activities and maintenance procedures associated with a consumer fuel installation.

The EMP provides management options to ensure impacts of the facility 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 management measures provided in the EMP should be adhered to during the various phases of the operation of the facility. The EMP acts as a stand-alone document. All personnel taking part in the operations of the facility should be made aware of the contents in this section, so as to plan the operations accordingly and in an environmentally sound manner.

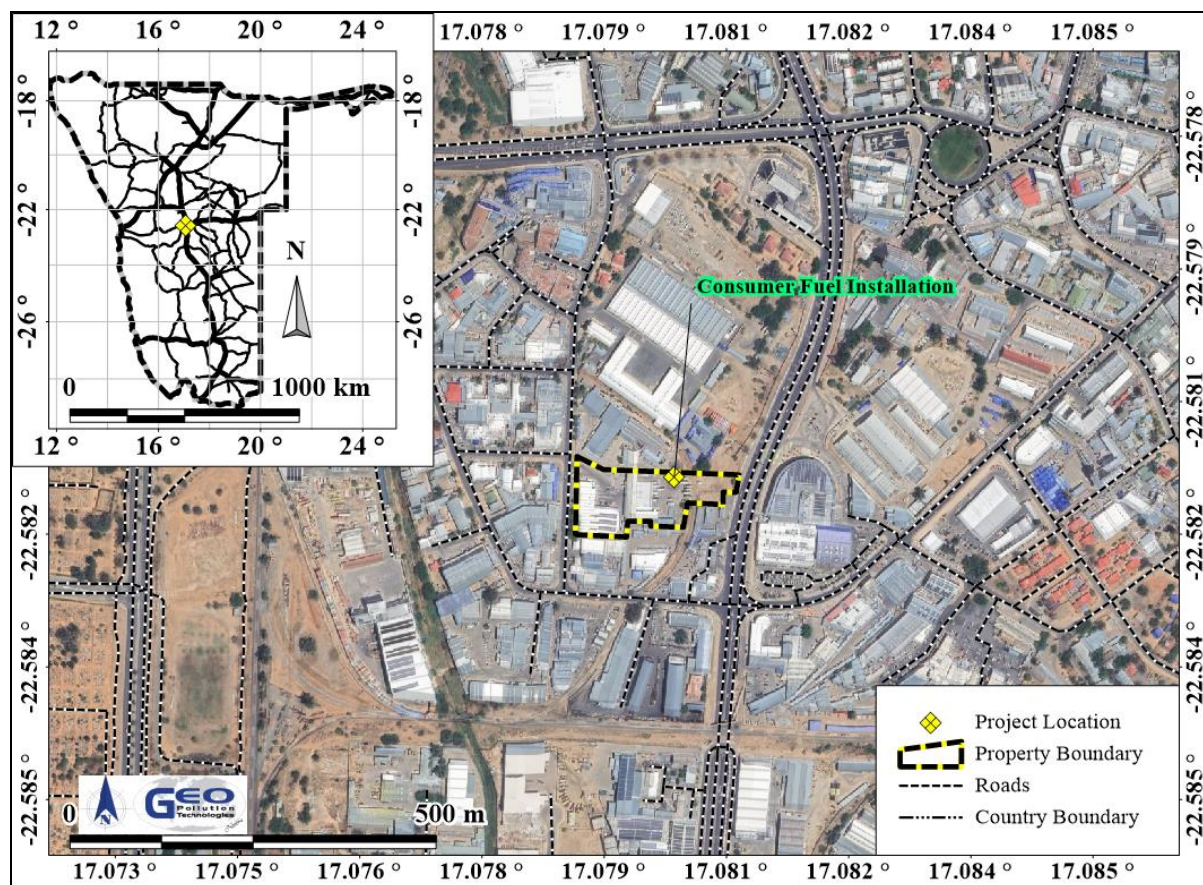


Figure 1-1 Project location

2 THE ENVIRONMENTAL MANAGEMENT PLAN

The following general guidance for the EMP is based on the findings of the environmental impact assessment and risk assessment carried out by Geo Pollution Technologies (Faul et al. 2017).

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

The following is the summary of the identified impacts:

- ◆ Surrounding properties are zoned for light industrial and commercial use.

- ◆ During operations, traffic impacts are expected.
- ◆ The risk of groundwater and soil pollution is present.
- ◆ The risk of an accident/incident causing fire is unlikely since diesel is not as flammable as more volatile fuels. Human factors are still being considered and the best engineering still goes in to maintaining a very safe facility. If a fire was to occur and the necessary engineered structures were not in place there would be a significant possible impact on the adjoining industrial properties.

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

The following is a summary of the proposed management plan, which will aim at making the facility safe taking into consideration all identified risks:

- ◆ To prevent product loss through ruptures of pipelines or hose during the offloading operations, all nozzles on road tankers and storage tanks are fitted with excess flow check valves. These are designed to allow only specific flow rates and the moment it exceeds this, the process is stopped. Small quantities lying in the hose that could leak would be captured by spill containment structures.
- ◆ Noise and traffic management when necessary.
- ◆ Firefighting equipment present on site.
- ◆ The proposed facility would not cause any substantial ecological threat to the environment in the vicinity of Windhoek. Contamination of soils or groundwater is prevented through safe work practices, engineered safety devices and spill containment structures.

3 THE IMPLEMENTATION OF THE ENVIRONMENTAL MANAGEMENT PLAN

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

- ◆ Planning Phase
- ◆ Operational Phase
- ◆ Maintenance and Decommissioning Phase

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

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 to the Ministry of Environment, Forestry and Tourism.

Table 1 Planning for upgrades, operations and future decommissioning of the project

| Activity | Objective | Action | Timing | Proof of Compliance | Responsible Body |
|---------------------|--|--|--|---|-----------------------|
| Compliance | To comply with all legal requirements for the upgrade and operations of the facility in Namibia. | Where applicable, apply for the necessary permits from the various ministries, local authorities and any other bodies that governs the upgrade and operations of the proposed activity. Finalise negotiations and resolve any outstanding issues, if any, over the allocation of user rights and zoning of the property on which the proposed activity will be located. | Ongoing throughout operations and prior to decommissioning | All contracts, permits, certificates and other legal documents on file. | Proponent |
| Appointments | To appoint reputable contractors and operational personnel and establish the EMP, a legal requirement that forms part of the contract with the contractor and employees. | Appoint a contractor and employees and enter into an agreement which includes the EMP. Ensure that the contents of the EMP are understood by the contractor, sub-contractors, employees and all personnel who will be present on site. | Ongoing throughout operations and prior to decommissioning | Contracts on file | Proponent; Contractor |
| Management | Establish a management system to implement and monitor health, safety and environment (HSE). | 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 in place to deal with all emergencies: Risk management / mitigation / EMP / emergency response plan and health, safety and environment manuals Adequate protection and indemnity insurance cover for incidents; Comply with the provisions of all relevant | Ongoing throughout operations and prior to decommissioning | Documentation on file Personal protection equipment (PPE) on site Signage related to restricted areas, dangerous areas, and PPE requirements on site Emergency response material on site | Proponent; Contractor |

| Activity | Objective | Action | Timing | Proof of Compliance | Responsible Body |
|--|--|--|--|--|--|
| Restoration Fund/Insurance | To establish a fund / insurance for future environmental restoration or pollution remediation if ever required. | <p>safety standards; Procedures, equipment and materials required for emergencies.</p> <p>To establish 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.</p> | Ongoing throughout operations and prior to decommissioning | Financial statements of restoration fund / insurance | Proponent; Independent Specialist Consultant |
| Reporting | To establish a reporting system to report on monitoring aspects of upgrades, operation and decommissioning as outlined in the EMP. | <p>Establish a reporting system to report on aspects of operations, maintenance and decommissioning as outlined in the EMP.</p> <p>Submit monitoring reports on a bi-annual basis to the MEFT to allow for environmental clearance certificate renewal.</p> | Ongoing throughout operations and decommissioning | Bi-annual monitoring Reports | Proponent; Contractor |
| Environmental Clearance Renewal | To renew the environmental clearance certificate every three years. | Appoint a specialist environmental consultant to update the environmental impact assessment and / or EMP and apply for renewal of the environmental clearance certificate. | Prior to expiry of environmental clearance certificate | Renewed environmental clearance certificate | Proponent; Independent Specialist Consultant |

Table 2. The operational phase

| Criteria | Nature | Mitigation | Monitoring | Responsible Body |
|--|--|---|--|--|
| Enhanced skills and technology transfer to Windhoek and subsequent economic development | People need skills to perform their jobs. The technology to do something is often not found locally. Development of people and technology are key to economic development. | Training must be provided to Namibians to ultimately employ a predominantly Namibian workforce. | Copies of training certification or managerial references on file. Proof of appointment of local contractors on file. Bi-annual summary report based on actual training and the enhancement of skills and transfer of technology should be compiled. | Proponent; Directors & Public Relations personnel. |
| Demographic and Community Health | New developments attract people who seek work. This in turn can increase the extent of informal settlements and its associated problems. The increased trucking and distribution of goods to and via could contribute to the spread of HIV / AIDS. | The implementation of an educational program on HIV / AIDS for all the staff. Restricted employment for locals only should be practiced. Deviations from this practice should be justified appropriately. Training of local people should be considered from the start. These measures will reduce the influx of newcomers to the town and thereby reduce growth in the informal settlement. | Bi-annual summary report based on demographics, educational programmes and training conducted. | Proponent |
| Employment | Limited employment is created by the facility, however the facility plays an important role supporting NamPost's operations | If skills exist locally Namibians must be employed. Alternatively training must be provided to Namibians to ultimately employ a predominantly Namibian workforce. Deviations from this practice should be justified appropriately. | Bi-annual summary report based on employee records. | Proponent |
| Traffic | This site is situated in Voigts Street in the Southern Industrial Area of Windhoek. Operations may cause traffic disruptions and impact on nearby businesses when trucks are parked in the street. | Tanker trucks delivering fuel should not be allowed to obstruct any traffic in Voigts Street. 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. | Any complaints received regarding traffic issues should be recorded. A bi-annual report should be compiled of all incidents reported and complaints received with remedial action taken. | Proponent |
| Fire Hazard | Products kept on site are flammable and | A holistic fire protection and prevention plan is needed. | A report should be compiled | Proponent |

| Criteria | Nature | Mitigation | Monitoring | Responsible Body |
|--------------------------------------|---|---|--|------------------|
| | therefore a fire risk exists. | <p>This plan must include an emergency response plan, firefighting plan and spill recovery plan.</p> <p>Maintain firefighting equipment, good housekeeping and personnel training (firefighting, fire prevention and responsible housekeeping practices).</p> <p>Maintain regular site, mechanical and electrical inspections and maintenance.</p> <p>Clean all spills / leaks.</p> <p>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).</p> <p>Follow SANS standards for operation and maintenance of the facility.</p> <p>In case of a fire, the firefighting plan must be initiated immediately and all emergency procedures must be performed as practiced during training.</p> | bi-annually of all incidents reported. The report should contain dates when fire drills were conducted and when fire equipment was tested. | |
| Health, Safety & Security | Risks include work related injuries or exposures to harmful products, theft and sabotage. | <p>All Health and Safety standards specified in the Labour Act should be complied with.</p> <p>All staff members to be briefed about the potential risks of exposure to hydrocarbons or injuries on site.</p> <p>Adhere to the following:</p> <ul style="list-style-type: none"> ● Health and Safety Regulations pertaining to personal protective clothing, first aid kits being available on site, warning signs, etc.; ● Selected personnel should be trained in first aid. The contact details of all emergency services must be readily available; ● Dermal contact with hydrocarbons must be avoided and all products handled according to their MSDS. | A report should be compiled bi-annually of all incidents reported. The report should contain dates when training was conducted and when safety equipment and structures were inspected and maintained. | Proponent |
| Noise | Limited noise pollution will exist due to | The site is situated within the Windhoek municipal area and | Any complaints received | Proponent |

| Criteria | Nature | Mitigation | Monitoring | Responsible Body |
|--|---|---|---|--|
| | heavy vehicles accessing the site to offload fuel or refuel. | the City of Windhoek Council Resolution Guidelines 215/09/2006 with regards to noise emissions should be followed. Guidelines should be followed specifically for noise levels in industrial areas. | regarding excessive noise should be recorded with notes on action taken. All complaints and remedial action taken to be compiled in a bi-annual report. | |
| Waste Production | Waste can be of domestic origin or hazardous waste that include hydrocarbon contaminated materials. | Waste reduction measures should be implemented and all waste that can be re-used / recycled must be kept separate. Ensure adequate waste 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 trap should be cleaned regularly and waste disposed of appropriately. 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. | A register of hazardous waste disposal should be kept. This should include type of waste, volume as well as disposal method / facility. Any complaints received regarding waste should be recorded with notes on action taken. All data to be compiled in a bi-annual report. | Proponent |
| Groundwater, Surface Water and Soil Contamination | Leakages from storage tank and reticulation and accidental spills of fuel | All fuel offloading and refuelling should be conducted on surfaces provided for this purpose. Proper training of operators. Spillage control procedures must be in place according to SANS standards or better. Regular inspection and maintenance of all equipment. Any spillage of more than 200 l must be reported to the | A report should be compiled bi-annually of all spills or leakages reported. The report should contain the following information: <ul style="list-style-type: none"> ● date and duration of spill ● product spilled ● volume of spill ● remedial action taken | Proponent, Independent Specialist Consultant |

| Criteria | Nature | Mitigation | Monitoring | Responsible Body |
|--|---|--|--|------------------|
| | | <p>relevant authorities and remediation instituted.</p> | <ul style="list-style-type: none"> ● Comparison of pre-baseline exposure data with post remediation data (e.g. soil hydrocarbon concentrations) ● Copy of documentation in which spill was reported to Ministry of Mines and Energy <p>Soil sampling and testing should a leak be suspected.</p> <p>All data to be compiled in a bi-annual report.</p> | |
| Ecosystem and Biodiversity Impact | <p>The effect of operational activities on the ecosystem functioning and biodiversity. Mostly associated with the spillage and spread of diesel.</p> | <p>The development falls within an industrial area where most biodiversity has been removed long ago.</p> <p>The nesting of birds should be discouraged. Changes to buildings should take into account the habitats that can be created inadvertently by certain architectural or engineering designs.</p> | <p>A record should be kept of any extraordinary fauna sightings or encounters on site.</p> <p>All data to be compiled in a bi-annual report.</p> | Proponent |
| Visual Impact | <p>This is an impact that affects the aesthetic appearance.</p> <p>The infrastructure does not have a significant effect on the visual horizon as it is similar to the other structures in the industrial area and to those which are already present at the development.</p> | <p>Routine maintenance on infrastructure will ensure a low / negligible visual impact and that the longevity of structures is maximised. It is important that the real integrity of the structures is considered in the long term and not just appearances.</p> | <p>A bi-annual report should be compiled of all complaints reported.</p> | Proponent |
| Cumulative Impact | <p>These are impacts on the environment, which result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of who undertakes such other actions.</p> | <p>Addressing each of the individual impacts as discussed and recommended in the EMP would reduce the cumulative impact.</p> <p>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</p> | <p>Bi-annual summary reports based on all other impacts will give an overall assessment of the impact of the operational phase.</p> | Proponent |

| Criteria | Nature | Mitigation | Monitoring | Responsible Body |
|----------|--|---------------------------------------|------------|------------------|
| | <p>Cumulative impacts can result from individually minor, but collectively significant actions taking place over a period of time. In relation to an activity, it means the impact of an activity that in itself may not be significant, may become significant when added to the existing and potential impacts resulting from similar or diverse activities or undertakings in the area.</p> <p>Possible cumulative impacts associated with the operational phase include increase in traffic frequenting the site and along the sections of roads near the facility. An increase in emissions from these vehicles will decrease the air quality around the facility. Wear and tear on the roads and increased risks of road traffic incidences could increase. Additional traffic and operational noise would further increase noise impacts in the area. Other companies are using the roads to access the area. Trucks parked at the facility and the use of the facility for overnight stays could have health implications through lack of well-maintained garbage removal and abatement amenities.</p> | <p>Mitigations are insufficient..</p> | | |

Table 3. Maintenance and decommissioning phase

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

| Criteria | Nature | Mitigation | Monitoring | Responsible Body |
|--|--|---|--|-----------------------|
| Dust | Dust may be generated during the decommissioning phase and might be aggravated during periods of strong winds. | It is recommended that regular dust suppression be included in the decommissioning phase, when dust becomes an issue. Personnel should be issued with dust masks for health and safety reasons. | Regular visual inspection. A complaints register must be maintained, in which any complaints from the community must be logged. Complaints must be investigated and, if appropriate, acted upon. | Proponent; Contractor |
| Noise | Noise pollution will exist due to heavy vehicles accessing the site to collect rubble from demolished building materials. Cranes may be erected for removing the storage tank. Hammers, diggers and drills will be used. | The site is situated within the Windhoek municipal area and the City of Windhoek Council Resolution Guidelines 215/09/2006 with regards to noise emissions should be followed. Guidelines should be followed specifically for noise levels in industrial areas. All personnel must be issued with hearing protectors and neighbours must be notified of the time and duration of decommissioning. Notice of the start of the decommissioning should be given to the local authorities with an invitation to give feedback at any time with regards to the noise impact. | A complaints register must be maintained, in which any complaints from the community must be logged. Complaints must be investigated and, if appropriate, acted upon. | Proponent; Contractor |
| Visual Impact | This is an impact that affects the aesthetic appearance | Visual impact could pose one of the most significant impacts. Visual impacts could be limited through keeping all decommissioned areas clean and orderly at all times. Good housekeeping also reduces the risk of injuries. Notice of the start of the decommissioning should be given to the local authorities with an invitation to give feedback at any time with regards to the visual impact. | A complaints register must be maintained, in which any complaints from the community must be logged. Complaints must be investigated and, if appropriate, acted upon. | Proponent; Contractor |
| Groundwater, Surface Water and Soil Contamination | Porous surface substrate can allow unwanted hazardous and ecologically detrimental substances to seep down to the water table. | All precautions are to be taken to prevent contamination of the soil as this could enter the ecosystem. Leakages from vehicles might occur especially if they are serviced on site. Care must be taken to avoid contamination of soil and groundwater. Groundwater might spread pollutants to neighbouring receptors and may create an impact on | Report form for all spills or leaks is to be completed by Contractor and submitted to the Nampost HSE. A baseline study must be | Proponent; Contractor |

| Criteria | Nature | Mitigation | Monitoring | Responsible Body |
|------------------------------------|---|---|--|-----------------------|
| | | <p>underground utilities (i.e. fresh water supply to buildings, sewerage system). Pollutants in the soil and building rubble must be transported away from the site to an approved, appropriately classified waste disposal site.</p> <p>Confirm material safety data sheet information for any remaining fuels, oils or lubricants that must be discarded.</p> <p>Regulations on sewerage discharge and the chemicals that may and may not be put into the sewerage system must be followed.</p> | <p>carried out after the decommissioning. This is to assess the condition of soil substrate and any groundwater present. Comparisons with pre-construction baseline data is to be made and any discrepancies must be addressed before the site can be signed over.</p> | |
| Health, Safety and Security | <p>During the decommissioning phase similar risks to human beings as with previous phases will be present. Once the tank and pipelines have been emptied completely of their contents residual amounts of fuel might exist. All other risks associated with demolitions must be considered.</p> | <p>The decommissioning of a bulk fuel storage facility can cause serious health and safety risks to workers on site. Occupational exposures are normally related to dermal contact with fuels and inhalation of fuel vapours during handling of such products. For this reason adequate measures must be brought in place to ensure safety of staff on site, and includes: (Provide forms for all end users who monitor)</p> <ul style="list-style-type: none"> ● Proper training of operators; ● First aid treatment; ● Medical assistance; ● Emergency treatment; ● Prevention of inhalation of fumes (fuel); ● Protective clothing, footwear, gloves and belts; safety goggles and shields; ● Manuals and training regarding the correct handling of materials and packages should be in place and updated as new or updated material safety data sheets become available; Risks might be lower but still exist especially if tanks must be entered for inspections. Confined Space Training may be required. ● 24-hour security surveillance in case of opportunistic activities. | <p>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 it self.</p> | Proponent; Contractor |
| Fire Hazard | <p>Residual hydrocarbons could be present and might pose a risk to the teams dismantling the various structures. Fire</p> | <p>Various international occupational health and safety performances should be consulted for specific regulations regarding the decommissioning of the facility to ensure all risks are mitigated. All relevant regulations and precautions</p> | <p>A register of all incidents must be maintained on a daily basis. This should include measures taken to</p> | Proponent; Contractor |

| Criteria | Nature | Mitigation | Monitoring | Responsible Body |
|----------|-----------------------------------|--|--|------------------|
| | <p>events are still possible.</p> | <p>should be in place as it was during the Operational Phase. In addition to this, all personnel have to be sensitised about responsible fire protection measures and good housekeeping such as the removal of flammable materials including rubbish, dry vegetation, and hydrocarbon-soaked soil from the vicinity of the fuel storage facility. Regular inspections should still be carried out to inspect and test fire fighting equipment and pollution control materials at the fuel storage facility. All fire precautions and fire control at the fuel storage facility must be in accordance with SANS, or better. The holistic fire protection and prevention plan should still be utilised. Experience has shown that the best chance to rapidly put out a major fire is in the first 5 minutes. It is important to recognise that a responsive fire prevention plan does not solely include the availability of fire fighting equipment, but more importantly, it involves premeditated measures and activities to timeously prevent, curb and avoid conditions that may result in fires.</p> | <p>ensure that such incidents do not repeat it self.</p> | |

4 CONCLUSIONS

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

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

Monitoring reports must be submitted to the Ministry of Environment, Forestry and Tourism on a bi-annual basis to allow for future renewal applications for an environmental clearance certificate.

5 REFERENCES

Faul A, Botha P, Short S. 2017. Environmental Impact Assessment for the Upgrade and Operations of a Consumer Fuel Installation for Namibia Post Ltd in Windhoek