



APPLICATION FOR THE **RENEWAL OF ENVIRONMENTAL
CLEARANCE CERTIFICATE FOR
UUKUMWE INVESTMENT YOUTH EMPOWERMENT
CONSORTIUM PTY LTD, FOR THE OPERATION OF THE SEAL
PROCESSING
FACTORY AT LÜDERITZ //KARAS REGION**



CONSULTANT:

**Mr. Ipeinge Mundjulu (BSC, MSc)
Red-Dune Consulting CC
P O Box 27623 Windhoek**

PROPONENT

**Investment Youth Empowerment
Consortium Pty Ltd
P O Box 24749
Windhoek**



DOCUMENT INFORMATION

Document Status	Final
Project Title	APP:004527
Application Number	Renewal Of Environmental Clearance Certificate for Uukumwe Investment Youth Empowerment Consortium Pty Ltd, For the Operation of The Seal Processing
Proponent	Uukumwe Investment Youth Empowerment Consortium Pty Ltd
Location	Lüderitz //Karas Region
Author	Mr. Ipeinge E. Mundjulu
Date	8 th August 2024
Aim	RENEWAL of Environmental Clearance Certificate
Copyright notice; <i>This report and its content is copyright of Red-Dune Consulting CC. Any redistribution or reproduction of part or all the content in an any form other than the intend purpose is prohibited.</i>	

Table of Contents

ACRONYMS.....	i
Executive Summary	ii
Chapter 1 Introduction	1
1.1 Proponent	1
1.2 Renewal of Environmental Clearance Certificate.....	1
Chapter 2 Project Description.....	1
2.1 Location	1
2.2 Seal harvesting	1
2.3 Tsau //Khaeb National Park	1
Chapter 3 Seal Processing.....	2
3.1 Process Flow	2
3.2 Key environmental concerns.....	3
3.2.1 Biochemical Dissolved Oxygen.....	3
Chapter 4 The Updated Environmental Management Plan	4
4.1 Purpose of the EMP	4
4.2 Compliance to the EMP	4
4.3 Roles & Responsibilities.....	4
4.3.1 Proponent (Seal Products Pty Ltd).....	4
4.3.2 Environmental Compliance Officer (ECO)	5
4.3.3 Site Manager (SM).....	5
4.3.4 Employees.....	5
4.4 Disciplinary Action.....	5
4.4.1 Proponent	5
4.4.2 Workers.....	5
Chapter 5 Policy and Legal Framework.	6
Chapter 6 The EMP table.....	13
OPERATIONAL PHASE.....	13
Chapter 7 Conclusions and Recommendations.....	29
7.1 Conclusion	29
7.2 Recommendation	29
Chapter 8 Factory Pictures.....	30
Chapter 9 Annexures.....	31
9.1 Annex 1: Existing ECC.....	31

List of Figures

Figure 1. Location of the factory (Yellow Square)..... 1
Figure 2: Aqua Treatment Plant.....3

List of Tables

Table 1. Policy and Legal Framework6
Table 2. The EMP 13

ACRONYMS

AIDS	Acquired Immuno Deficiency Syndrome
BOD	Biochemical Dissolved Oxygen
DEA	Department of Environmental Affairs
EA	Environmental Assessment
EAP	Environmental Assessment Practitioner
ECC	Environmental Clearance Certificate
ECO	Environmental Compliance Officer
EIA	Environmental Impact Assessment
EMA	Environmental Management Act (Act No. 7 of 2007)
HIV	Human Immune Virus
I&AP	Interested and Affected Parties
MEFT	Ministry of Environment Forestry and Tourism
NHC	Namibian National Heritage Council
RDC	Red-Dune Consulting
TAC	Total Allowable Catch

Executive Summary

The Proponent, Uukumwe Investment Youth Empowerment Consortium Pty Ltd operates a seal processing factory. Harvesting of Marine resources is regulated by the Marine Resources Act, 2000 (Act No. 27 2000). Under this Act, an individual can only harvest marine resource when granted a right and quota.

The company was issued with an Environmental Clearance Certificate (ECC) in August 2021 (**Annex 1**) and is now due to expire on August 2024. Red-Dune Consulting CC undertook an environmental audit on 1st August 2024 at the company's factory. The factory operation was found to be complying with the existing EMP.

The most important aspect of sludge and waste water from the factory was well addressed (a closed reticulation system is in place and no sludge or waste water enters the municipal sewer system).

In conclusion, the environmental audit did not find issues of non-compliance that would stop the renewal of the environmental clearance certificate for the factory. Hence, it is recommended for the renewal of the ECC.

Chapter 1 Introduction

1.1 Proponent

The Proponent, Uukumwe Investment Youth Empowerment Consortium Pty Ltd operates a seal processing factory in Lüderitz. Harvesting of Marine resources is regulated by the Marine Resources Act, 2000 (Act No. 27 2000). Under this Act, an individual can only harvest marine resource when granted a right and quota. In this case, the Company is the right holder for harvesting of seal in Namibia at the southern seals colony.

1.2 Renewal of Environmental Clearance Certificate

The Environmental Management Act (Act No. 7 of 2007) (EMA) compelled the company to develop an Environmental Management Plan (EMP) for the operation of the seal factory. The company was issued with an Environmental Clearance Certificate (ECC) in August 2021 (**Annex 1**) and is now due to expire on August 2024. Section 42 of EMA states that the ECC is only valid for the duration not exceeding three years from the date of issuance and Section 56 of EMA provides for the renewal of the ECC.

The company appointed Red-Dune Consulting CC to undertake environmental audit at the factory for purpose of application of the ECC. This document therefore forms part of the application for the renewal of the ECC. This BID summaries factory activities while an updated Environmental Management Plan for the operation of the factory will be submitted for review.

Chapter 2 Project Description

2.1 Location

The factory is location located on the townlands of Lüderitz in //Karas at coordinates - 26.626261° N, 15.173272°S (**Figure 1**).



Figure 1. Location of the factory (Yellow Square)

2.2 Seal harvesting

The Ministry of fisheries and Marine Resource has set a seal harvesting season to commerce on 1st July until end on 15th November every year. The seals are harvested at Atlas and Wolf Bay colonies in the south and Cape Cross and Torra Bay colonies in the north. Uukumwe harvests at the southern colonies. Atlas and Wolf Bay colonies are in Tsau //Khaeb¹ National Park which requires entry permit from the Ministry of Environment Forestry and Tourism (MEFT).

Harvesting is done between 6:00am – 9:00am in the presence of fisheries inspectors, fisheries biologist, and Namibian Police to ensure compliance.

The carcasses are transported by trucks and 4X4 vehicles to the factory for processing. Harvesting starts early morning, while the seals are out of water until 9am-10am. During transportation, the trucks are covered with hard black plastics to prevent carcasses from falling off.

2.3 Tsau //Khaeb National Park

According to MEFT, Tsau //Khaeb (Khoekhoe Language: Tsau meaning Soft and //Khaeb meaning Sand) is newly proclaimed protected area. Since 1908 the largest part of the Tsau //Khaeb National Park was left undisturbed and closed to the public for nearly a century following the discovery of a diamond at Kolmanskop near Lüderitz by the railway worker, Zacharias Lewala. Although this was done to protect the mineral wealth of the area, it also contributed to safeguarding the Succulent Karoo ecosystem, which has the highest diversity² of succulent flora globally.

The Succulent Karoo biome is an internationally recognized biodiversity hotspot, and is the world's only arid hotspot. The biome extents 116 000 km² from south-west through the north-western areas of South Africa and into southern Namibia. The biome is home to 6 356 plant species, 40% of which are endemic and 936 (17%) of which are listed in the Red Data Book.

¹ formerly known as Sperrgebiet (German: “Prohibited Area”), which could not be entered without a pass.

² The variety of plant species that are found in a particular area

In addition to its floral diversity, 27 amphibian species, 29% of which are endemic; 121 reptile species, 20% of which are endemic; 68 mammal species, 9% of which are endemic; and 431 bird species have thus far been recorded³.

The park has giant rock arches, meteor craters, fossil and archaeological sites including Africa's most important shipwreck discovery and some of the most pristine and wild landscapes on the planet. Some 1 050 plant species are known to occur in the park, nearly 25% of the entire flora of Namibia on less than three per cent of the land area of the country. This led to the listing of the Succulent Karoo as one of the world's top 34 'biodiversity hotspots'. Tsau //Khaeb National Park is one of a 'new era' of protected areas, proclaimed to protect biodiversity while contributing to the local and national economy through tourism development and concessions⁴.

Chapter 3 Seal Processing

3.1 Process Flow

1. Seal are transported to the factory and offloaded at the receiving area.
2. The seals are picked up and hung on rails
3. The seals are then washed
4. The skins are mechanically removed from the carcass
5. The skins are then washed
6. The remaining (Fat) Blubber on skin is then peeled (removed) by a shaving machine
7. The skins are then washed again
8. The skins are then put through a roller machine to press out all excess water
9. The skins are then treated with salt (Wet salted)
10. The treated skins are then ready to be exported wet
11. All excess fat (blubber) are then manually removed from carcasses by the workers
12. Carcasses are then taken to steam pot where it is cooked for 5 hours at 250⁰C at 3bar pressure
13. Excess water is blown off

³ UNESCO

⁴ Ministry of Environment, Forestry and Tourism, 2020. Management Plan for Tsau //Khaeb (Sperrgebiet) National Park 2020/2021-2029/2030

14. Cooked carcasses are then cut into smaller pieces
15. Cut up pieces are then moved to outside concrete floor and sun dried
16. Dried pieces are picked up and put through a hammer mill
17. Seal meal is then packed into 25kg bags and sold as animal feed
18. The collected fat (blubber) is milled
19. The milled fat (blubber) is cooked in the steam pot at 70 to 80C.
20. Liquid oil is tapped off
21. Oil is stored in bulk plastic tanks for retail
22. Waste water from cleaning of the factory is collected in an aqua-treatment plant (**Figure 2**), chemically treated before it is channelled to the sewer system.



Figure 2: Aqua Treatment Plant

3.2 Key environmental concerns

3.2.1 Biochemical Dissolved Oxygen

The waste water and sludge contain fat and blood which if enters the Municipality sewerage system, it may cause high level of Biochemical Dissolved Oxygen (BOD), which may have devastating effect in reticulation water system. The factory has an aqua treatment facility that treats the effluent for discharging into the town's sewerage system. Hence waste from the factory only enters the municipality sewerage system after being treated in the aqua-plant to reduce the level of Biochemical Dissolved Oxygen.

Chapter 4 The Updated Environmental Management Plan

4.1 Purpose of the EMP

This Environmental Management Plan (EMP) is a risk strategy that contains logical framework, monitoring programme, mitigation measures, and management control strategies to minimize environmental impacts. It further stipulates the roles and responsibility of persons involved in the project. These strategies are developed to reduce the levels of impacts for the project.

4.2 Compliance to the EMP

This EMP is a legally binding document as given under the provisions of the Environmental Management Act, 2007 (Act No. 7 of 2007). The project Proponent and its contractors must adhere to the framework of this document.

4.3 Roles & Responsibilities

4.3.1 Proponent (Seal Products Pty Ltd)

The Proponent shall take overall responsibility for proper implementation of the EMP. It remains the responsibility of the proponent to appoint key personnel for the implementation of the EMP.

The proponent must therefore;

- Appoint a site Manager
- Ensure employees understand the guidelines of the EMP
- Ensure the EMP is well explain to Contractors
- Ensure safer working environment
- Provide workers with Personal Protective Clothing
- Ensure the environment is protected and

In events where the proponent hires or subcontract contractors for the job, the proponent must ensure that the contractor is in position to execute the mandate of the EMP.

4.3.2 Environmental Compliance Officer (ECO)

Compliance to EMP is enforce by the environmental inspector as provided for under Environmental Management Act (No. 7 of 2007) (EMA). Hence the ECO is an individual appointed as an environmental inspector under EMA. Depending on his/her work schedule, the ECO shall visit the site at any time for environmental inspection and monitoring.

4.3.3 Site Manager (SM)

The site manager represents the proponent on site. He/she shall be responsible for daily activities in ensuring environmental protection. All communication about the implementation of EMP must be channelled through the SM.

4.3.4 Employees

It shall be responsibility of employees to adhere to the provision of EMP. At all times when on site, employees are expected to ensure their safety by wearing personal protective equipment clothing, report worn out PPE and request for replacement.

4.4 Disciplinary Action

4.4.1 Proponent

The EMP is a legally binding document, non-compliance to the EMP is punishable upon conviction under EMA. Amongst others, legal action, fines, and suspension of work or both.

4.4.2 Workers

Workers found contravening the EMP must be disciplined by the Proponent such as warning.

Chapter 5 Policy and Legal Framework.

Legal framework applicable to the project.

Table 1. Policy and Legal Framework

Policy/Legislation	Provisions	Applicability to the Project
<p>The Namibian Constitution 1990 Article 95(1)</p> <p>Article 91 (c)</p>	<p>The Namibian constitution is the supreme law of the country which is committed to sustainable development. Article 95(1) of the Constitution of Namibia states that: - <i>“The State shall actively promote and maintain the welfare of the people by adopting policies aimed at ... The maintenance of ecosystems, essential ecological processes and biological diversity of Namibia and utilization of living natural resources on a sustainable basis for the benefit of all Namibians, both present and future”</i>.</p> <p>Define the duty of the Ombudsman to investigate complaints concerning the over-utilization of living natural resources, the irrational exploitation of non-renewable resources, the degradation and destruction of ecosystem and failure to protect the beauty and character of Namibia.</p>	<p>Undertake an Environmental Assessment to protect the environment and maintain the marine and terrestrial ecological process.</p> <p>This act promote the sustainable harvesting of the seal resource</p>

Policy/Legislation	Provisions	Applicability to the Project
The Environmental Management Act (No. 7 of 2007)	The Environmental Management Act (No. 7. of 2007) aims to promote the sustainable management of the environment and the use of natural resources and to provides for a process of assessment and control of activities which may have significant effects on the environment; and to provide for incidental matters. The acts provides a list of activities that may not be undertake without an environmental clearance certificate.	The project must abide to the statutory requirement of EMA and EIA regulation. Undertake environmental audit and update the EMP for the project.
Draft Pollution Control and Waste Management Bill	This Bill serves to regulate and prevent the discharge of pollutants to air and water as well as providing for general waste management. The Bill will repeal the Atmospheric Pollution Prevention Ordinance (11 of 1976) when it comes into force. The Bill also provides for noise, dust or odour control that may be considered a nuisance. Further, the Bill advocates for duty of care with respect to waste management affecting humans and the environment and calls for a waste management licence for any activity relating to waste or hazardous waste management.	Management of Waste, and any pollutant such as brine. Chemical that may have effect on humans etc.

Policy/Legislation	Provisions	Applicability to the Project
Atmospheric Pollution Prevention Ordinance Act No. 11 of 1976.	This ordinance serves to control Air pollution from point sources, but it does not consider ambient air quality. The Ordinance requires any person carrying out a ‘schedule process’ which are processes resulting in noxious or offensive gases typically pertaining to point source emissions must obtain a registration from the Department of Health.	This ordinance seeks to ensure that, Noise, Dust are well managed. The sludge from the factory produce odour.
Regional Council Act, 1992 (Act No. 22 of 1992)	The Regional Councils Act legislates the establishment of Regional Councils that are responsible for the planning and coordination of regional policies and development. The main objective of this Act is to initiate, supervise, manage, and evaluate development at regional level.	The Seal factory is in the jurisdiction of Lüderitz Town Council. All relevant by-laws must be abided to.
Water Resources Management Act (2004)	This Act provides a framework for managing water resources based on the principles of integrated water resources management. It provides for the management, development, protection, conservation, and use of water resources. Furthermore, any watercourse on/or near the site and associated ecosystems should be protected in alignment with the listed principles.	Prevent disposal of effluent in the sewerage system.
Water Act No, 54 of 1956	This act states that, all water resources belong to the State. It prevents pollution and promotes the sustainable utilization of	Prevent discharge of effluent into water system.

Policy/Legislation	Provisions	Applicability to the Project
	<p>the resource. To protect these resources, this act requires that permits are obtained when activities involve the following;</p> <p>(a) Discharge of contaminated into water sources such as pipe, sewer, canal, sea outfall and</p> <p>(b) Disposal of water in a manner that may cause detrimental impact on the water resources</p>	
Labour Act No. 6 of 1992	<p>This Act aims to regulate labour in general and includes the protection of the health, safety, and welfare of employees. The 1997 Regulations relating to the Health and Safety of employees at work sets out the duties of the employer, welfare and facilities at the workplace, safety of machinery, hazardous substances, physical hazards, medical provisions, construction safety and electrical safety.</p>	<p>Ensure that labour laws are followed.</p>
Public Health Act No. 36 of 1919	<p>The Act serves to protect the public from nuisance and states that no person shall cause a nuisance or shall suffer to exist on any land or premises owned or occupied by him or of which he is in charge any nuisance or other condition liable to be injurious or dangerous to health.</p>	<p>The waste collection dam and sewerage ponds attracts insect and can be a suitable breeding ground for mosquitos.</p>

Policy/Legislation	Provisions	Applicability to the Project
The Occupational Safety and Health Act No. 11 of 2007;	<p>Safety: A safety risk is a statistical concept representing the potential of an accident occurring, owing to unsafe operation and/or environment. In the working context “SAFETY” is regarded as “free from danger” to the health injury and to properties.</p> <p>Health: Occupational Health is aimed at the promotion and maintenance of the highest degree of physical, mental, and social wellbeing of workers in all occupations. This is done by ensuring that all work-related hazards are prevented and where they occur, managed.</p>	<p>This act ensures the protection of workers at work place.</p> <p>The project should maintain good and healthy standards, at the work place, cleanliness, adequate sanitary facilities, protection against dangerous substances.</p>
Nature Conservation Amendment Act, (Act No. 5 of 1996)	This act art the conservation of Natural Resource.	Seal is a natural resource that must be harvested sustainably. This is accomplished through the Marine Resource Act 2000, and exploitation based on scientific evidence.
Town Planning Amendment Act (Act No. 27 of 1993)	The act aim at regulating the town planning, ensure areas are zoned based on their use.	The building of the seal factory is within the town boundary of Lüderitz Town Council, and it should conform to the Town Planning Act

Policy/Legislation	Provisions	Applicability to the Project
Marine Resource Act (Act No. 27 2000)	To provide for the conservation of the marine ecosystem and the responsible utilization, conservation, protection, and promotion of marine resources on a sustainable basis; for that purpose, to provide for the exercise of control over marine resources; and to provide for matters connected therewith.	The harvesting of Seal can only be done when the proponent is granted a right to harvest marine resource under this act. Further, it call for scientific studies in determining the Total Allowable Catch (TAC) for marine resources.
Road Traffic and Transport Amendment Act (Act No. 6 of 2008)	To promote road safety.	The workers commute daily from Lüderitz to the colonies. Morning drives may pose safety risk to visibility, hence road safety as provided for by the act must be followed
Labour Act No. 6 of 1992	This Act aims to regulate labour in general and includes the protection of the health, safety, and welfare of employees. The 1997 Regulations relating to the Health and Safety of employees at work sets out the duties of the employer, welfare and facilities at the workplace, safety of machinery, hazardous substances, physical hazards, medical provisions, construction safety and electrical safety.	Ensure that labour laws are followed.
Regional Council Act, 1992 (Act No. 22 of 1992)	The Regional Councils Act legislates the establishment of Regional Councils that are responsible for the planning and coordination of regional policies and development. The main	The factory is in the jurisdiction of Lüderitz Town Council. All relevant by-laws must be abided to.

Policy/Legislation	Provisions	Applicability to the Project
	objective of this Act is to initiate, supervise, manage, and evaluate development at regional level.	
Soil Conservation Act No. 76 of 1969	This act promotes the conservation of soil, prevention of soil erosion.	Improper planning driving in the park may cause land degradation and destruction of pristine environment.

Chapter 6 The EMP table

Table 2. The EMP

Task/ Environmental Impact	Objective	Mitigation measure	Monitoring	Responsibility	Phase	Audit Comment
OPERATIONAL PHASE						
Socio Economic						
Job Opportunities and Economic Upliftment	Advantages for local previously disadvantaged communities in term of employment, empowerment, and socio-economic upliftment	<ul style="list-style-type: none"> ○ Ensure locals are priority to be employed. ○ Abide to the Namibian Labour Laws 	Record of local workers employed	Proponent	Operation Phase	The Factory employs between 16 – 21 temporary workers during harvesting and has 5 permanent employees. All casual workforce is sourced from Lüderitz
Staff induction	To ensure that all staff / employees are familiar with the requirements of the EMP	<ul style="list-style-type: none"> ○ All employees must go through induction course on all the provisions of the EMP. 	Record induction	Proponent	Operational Phase	Compliant

Task/ Environmental Impact	Objective	Mitigation measure	Monitoring	Responsibility	Phase	Audit Comment
		<ul style="list-style-type: none"> ○ Employees operating specialised equipment must be properly trained and informed of the potential risks associated with their tasks ○ There must be an annual induction course for all the workers. ○ New employees must not start work without taken through the induction course. ○ Ensure that a copy of an EMP is always available on site 				
HIV / AIDS	To prevent the spread of HIV/AIDS	○ Provide HIV / AIDS awareness to employees	Availability of Condoms at toilet site	Proponent	Operation Phase	Compliant

Task/ Environmental Impact	Objective	Mitigation measure	Monitoring	Responsibility	Phase	Audit Comment
		<ul style="list-style-type: none"> ○ Provide HIV / AIDS awareness at induction ○ Avail Condoms at the mine site 				
Aesthetic Pollution in the Park	To prevent un-controlled driving in the park, ensure proper clean up immediately after harvesting to prevent unpleasant scenes for visitors	<ul style="list-style-type: none"> ○ Only use existing road tracks in the parks ○ Apply sand to cover blood stains and others ○ Ensure harvesting takes place strictly between stipulated times by the MEFT to ensure activity does not overlap with tourism ○ Abide to the park management rules and condition of project in the parks 	Complain from park management (MEFT)	Proponent ECO	Operational phase	Compliant.
Traffic	To ensure road safety especially	<ul style="list-style-type: none"> ○ Slow moving vehicles such as trucks must be fitted with a safety 	Road accidents report	Proponent	Operation phase	Compliant

Task/ Environmental Impact	Objective	Mitigation measure	Monitoring	Responsibility	Phase	Audit Comment
	during poor visibility	flushing head lamp to warn other road users				
Atmospheric Pollution and Odours	Minimize atmospheric pollution and odours	<ul style="list-style-type: none"> ○ Maintain good housekeeping practise at all time ○ The emission from the factory and associated infrastructure would be dispersed according to the prevailing wind direction, with increased distance the concentration of the emitted particles will decrease ○ All general waste areas are to be maintained in a neat and orderly manner and bins must have secure lids. 	<p>Complaints from community</p> <p>Visual monitoring</p> <p>Closed bins</p>	Proponent	Operation phase	The factory is kept neat, waste water and effluent are stabilized to prevent rotting. There is a chimney fitted in the factory, for emitting vapour from boiler pots. General waste is placed in bins.
Noise	To minimise impact of noise on	○ Noise level shall be kept with acceptable	Complaints from neighbour	Proponent	Operation phase	Compliant

Task/ Environmental Impact	Objective	Mitigation measure	Monitoring	Responsibility	Phase	Audit Comment
	surrounding properties and environment	<p>limits, and forecourt staff must abide by National Noise Laws and local by-laws regarding noise</p> <ul style="list-style-type: none"> ○ Equipment such as mechanical equipment, extraction fans, refrigerators that are fitted with noise reduction facilities (e.g., fide flaps, silencers etc.) must be used as per operating instruction and maintained properly. ○ No employees must be exposed to noise levels above the 85dB (A) limit over a period of 8 hours. Should the noise level be higher 	Employee hearing test			

Task/ Environmental Impact	Objective	Mitigation measure	Monitoring	Responsibility	Phase	Audit Comment
		<p>than 85dB (A), the employer must implement a hearing conservation program such as noise monitoring;</p> <ul style="list-style-type: none"> ○ Provide Personal Protective Equipment to each employee such as ear muffs 				
Safety and Security	Ensure safety of staff and users of the facility	<ul style="list-style-type: none"> ○ Equipment and materials must be handled by staff that have been supervised and adequately trained ○ Staff must be regularly updated about the safety procedures. Emergency facilities must be available and adequately supplied 	Record of regular training for workers	Proponent	Operational phase	<p>The workers are trained every time before beginning of the harvesting season.</p> <p>It is recommended that a display board with emergency</p>

Task/ Environmental Impact	Objective	Mitigation measure	Monitoring	Responsibility	Phase	Audit Comment
		<p>for use by factory workers</p> <ul style="list-style-type: none"> ○ Emergency contact details of police, security company and fire department must be readily available. 				<p>numbers and be placed at every work station. A board showing emergency assembly point must be elected at the assembly point</p>
Sanitation and health hazards	Reduce health risks and environmental pollution	<ul style="list-style-type: none"> ○ Ensure adequate, hygienic (clean) and user-friendly ablution facilities for all staff; ○ Segregate Male and female toilets. ○ Rotate cleaning responsibilities among workers. Segregate Male and female toilets 	Clean ablution facilities	Proponent	Operational phase	<p>There are adequate and sufficient ablution facilities that are properly maintained. The proponent must ensure to maintain such standards</p>

Task/ Environmental Impact	Objective	Mitigation measure	Monitoring	Responsibility	Phase	Audit Comment
		<ul style="list-style-type: none"> ○ Inspect ablution facilities regularly 				
Biophysical						
Soil & Groundwater Contamination	Prevent soil and ground contamination	<ul style="list-style-type: none"> ○ All erected plant equipment must be located on a hardened (bund) surface to contain spillages ○ The factory must be constantly cleaned and washed appropriately ○ All runoff water must be collected in the aqua treatment before discharged to the municipality sewer system. ○ Provide drip trays to stationary vehicles 	<p>Record of regular training staff</p> <p>Record of regular monitoring</p> <p>Physical investigation</p>	Proponent	Operation Phase	The assessment was more concern with spill as the primary product being handled by the proponent. The Proponent does not store bulk hydrocarbon on site. Fuelling is done at the fuel station in town.
Soil, Surface, and Groundwater pollution	To prevent soil, surface, and ground	<ul style="list-style-type: none"> ○ Ensure the oil handling area is bonded with concrete 	Visual inspection	Proponent	Operation phase	Compliant

Task/ Environmental Impact	Objective	Mitigation measure	Monitoring	Responsibility	Phase	Audit Comment
	water pollution from handling of heavy fuel					
Risks of Fire & Explosion	Prevent emergency incidents (Prevent fire and explosion)	<ul style="list-style-type: none"> ○ Always avoid any source of ignition material on the premises ○ Staff must be properly trained on how to react and handle fire ○ There must be an automatic fire alarm system installed at the site ○ Firefighting equipment must be on site 24hours and regularly inspected to ensure that they are working such as water horse pipes, portable 	<p>Record of regular training staff</p> <p>Record of regular monitoring</p> <p>Physical inspection</p>	Proponent	operation phases	Compliant

Task/ Environmental Impact	Objective	Mitigation measure	Monitoring	Responsibility	Phase	Audit Comment
		<p>fire extinguishers and dry powder</p> <ul style="list-style-type: none"> ○ Emergency response numbers must be on clear and visible space ○ There must be clear hazard signage reading “NO OPEN FIRE” “NO SMOKING” and “SWITCH ENGINE OFF” ○ There must be drills to test staff on their readiness to fight fires ○ Provide personnel with full ○ protective clothing such as full-face air supplied or self-contained breathing apparatus, overalls, thermal insulated 				

Task/ Environmental Impact	Objective	Mitigation measure	Monitoring	Responsibility	Phase	Audit Comment
		<p>gloves, splash-proof goggles, and non-sparking boots.</p> <ul style="list-style-type: none"> ○ Ensure all workers are inducted on the dangers of fire and explosions risks and the emergency response; ○ Fire causing agents must be handled and stored properly ○ No naked fires should be allowed especially at fuel handling areas Provide designated and secure place for smoking; 				
Waste Generation & Disposal	Prevent pollution of ground & surface water and	<ul style="list-style-type: none"> ○ Solid waste generated need to be collected at a central point and disposed to a 	Removal of waste to a certified land fill site	Proponent	Operational phase	Compliant

Task/ Environmental Impact	Objective	Mitigation measure	Monitoring	Responsibility	Phase	Audit Comment
	the environmental as whole	municipal waste disposal site ○ Adhere to the Waste Management and Pollution Control Act ○ NO burning, onsite burying or dumping of waste shall occur ○ Waste stream generate on the site shall be sent to waste collection point for sorting and recycling ○ Bins shall be clearly marked to ease management of waste and recycling ○ Collected solid waste is the transported to local dumping site and disposed				

Task/ Environmental Impact	Objective	Mitigation measure	Monitoring	Responsibility	Phase	Audit Comment
Handling, Storage and Disposal of hazardous material	Prevent pollution from hazardous materials such as fuel, oil, and lubricants	<ul style="list-style-type: none"> ○ Abide to the Draft Pollution Control and Waste Management Bill, Public Health Act No. 11 of 2007, Water Act No, 54 of 1956 and the Petroleum Product and Energy Act No, 13 of 1990. ○ There must be drums on concrete bunds to contain waste/used oil and lubricants. ○ Ensure all vehicle are well service and leak inspection are done ○ Provide drip trays to stationary vehicle ○ Servicing of vehicle must be done at an approved site 	Visual monitoring for oil drop on the ground	Proponent	Operation	Compliant

Task/ Environmental Impact	Objective	Mitigation measure	Monitoring	Responsibility	Phase	Audit Comment
		<ul style="list-style-type: none"> ○ Storage of fuel, oil and lubricants must be kept on bonded structure ○ Bund and concrete slabs should be installed at each point where oils and lubricant are likely leak. ○ If an oil leak occur, collect the contaminated soil, store in appropriate container, and dispose of at Town Council disposal site. 				
1. Archaeological Material	To prevent damage and unlawful removal of archaeological material. (Especially in the	○ Workers must go through an induction course of the possible archaeological find possible in the area	Reports of Archaeological material	Proponent	Operational Pahe	Addendum to EMP

Task/ Environmental Impact	Objective	Mitigation measure	Monitoring	Responsibility	Phase	Audit Comment
	park where harvesting take place)	<ul style="list-style-type: none"> ○ Establish a “Chance Find Procedure” where if any archaeological finding (Heritage rock painting, and drawings), human remains or artefacts) during site activities is encountered; <ul style="list-style-type: none"> (a) The activity must be stopped immediately and the operation manager of that activity be informed (b) The manager oversees the cordoning off the area with a danger tape and 				

Task/ Environmental Impact	Objective	Mitigation measure	Monitoring	Responsibility	Phase	Audit Comment
		<p>take appropriate records and picture</p> <p>(c) The manager must immediately report the findings to the National Museum (+264 61 276800) or the National Forensic Laboratory (+264 61 240461).</p> <p>o No artefacts must be removed or be interfered without prior authorisation from the Namibian National Heritage Council (NHC)</p>				

Chapter 7 Conclusions and Recommendations

7.1 Conclusion

The operation of the seal factory has complied to the existing EMP, in its current form, it is not a threat to the socio-environment. The environmental audit did not find issues of non-compliance that would stop the renewal of the environmental clearance certificate for the factory.

7.2 Recommendation

- It is recommended that, the ECC be renewed
- MEFT, from time to time should inspect the company's operation in the park, to assess their compliance with park management rules.
- The department of Environmental Affairs is encouraged to undertake inspection from time to time at the factory to assess compliance.

Chapter 8 Factory Pictures



Skin Storage



Oil Storage Drums



Inside Factory



Skinning Area

Chapter 9 Annexures

9.1 Annex 1: Existing ECC

ECC – 01569 Serial: OVICGe1569



REPUBLIC OF NAMIBIA
MINISTRY OF ENVIRONMENT, FORESTRY AND TOURISM
OFFICE OF THE ENVIRONMENTAL COMMISSIONER

ENVIRONMENTAL CLEARANCE CERTIFICATE
ISSUED

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

TO

UUKUMWE YOUTH EMPOWERMENT CONSORTIUM (PTY) LTD
P. O. BOX 24749, WINDHOEK

TO UNDERTAKE THE FOLLOWING LISTED ACTIVITY

**OPERATION OF THE LUDERITZ SEAL PROCESSING FACILITY,
//KARAS REGION**

Issued on the date: **2021-08-15**
Expires on this date: **2024-08-15**



ENVIRONMENTAL COMMISSIONER

[\[See conditions on printed certificate \]](#)



Recycle

This certificate is printed without erasures or alterations.