CC/2024/07232

THE CONTINGENCY PLAN

FOR

THE OPERATIONS AND MAINTENANCE OF A GAS DEPOT STATION AND ASSOCIATED INFRASTRUCTURES AT TRANSNAMIB HOLDINGS Ltd WINDHOEK CONTAINER TERMINAL (WINCON) LOCATED IN THE NORTHERN INDUSTRIAL AREA, KHOMAS REGION; WINDHOEK, NAMIBIA

ECC APPLICATION NUMBER: ~~004757~~ 004979 new.

PROPONENT

Proponent: Hakahana Lacho Power and Gas cc
P. O Box 785
Katutura
Namibia
Signature: .....
Date: 04/12/2024

ENVIRONMENTAL ASSESSMENT PRACTIONER (EAP) / CONSULTANCY

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Date: 04/12/2024

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1 INTRODUCTION

1.1 Project Background

Hakahana Lacho Power Gas CC (hereto referred to as the Proponent in this document) proposed to lease land from Tran-Namib Holdings Ltd at Windhoek Container Terminal point to operate (storage) and distribute a gas (Depot) i.e., receiving Iso Tank from the port of Walvisbay and load them into trucks that will distribute them to their sale points around the country, and the Southern African Development Community (SADC) countries. The site is located in Northern Industrial Area as shown in **Figure 1**. The 2-hectare (200 meters) site and associated infrastructures are located within the industrial area (referred as Northern Industrial area) of the Town as shown in **Figure 1** below. The site is within an area designated as a container terminal and the railway station.

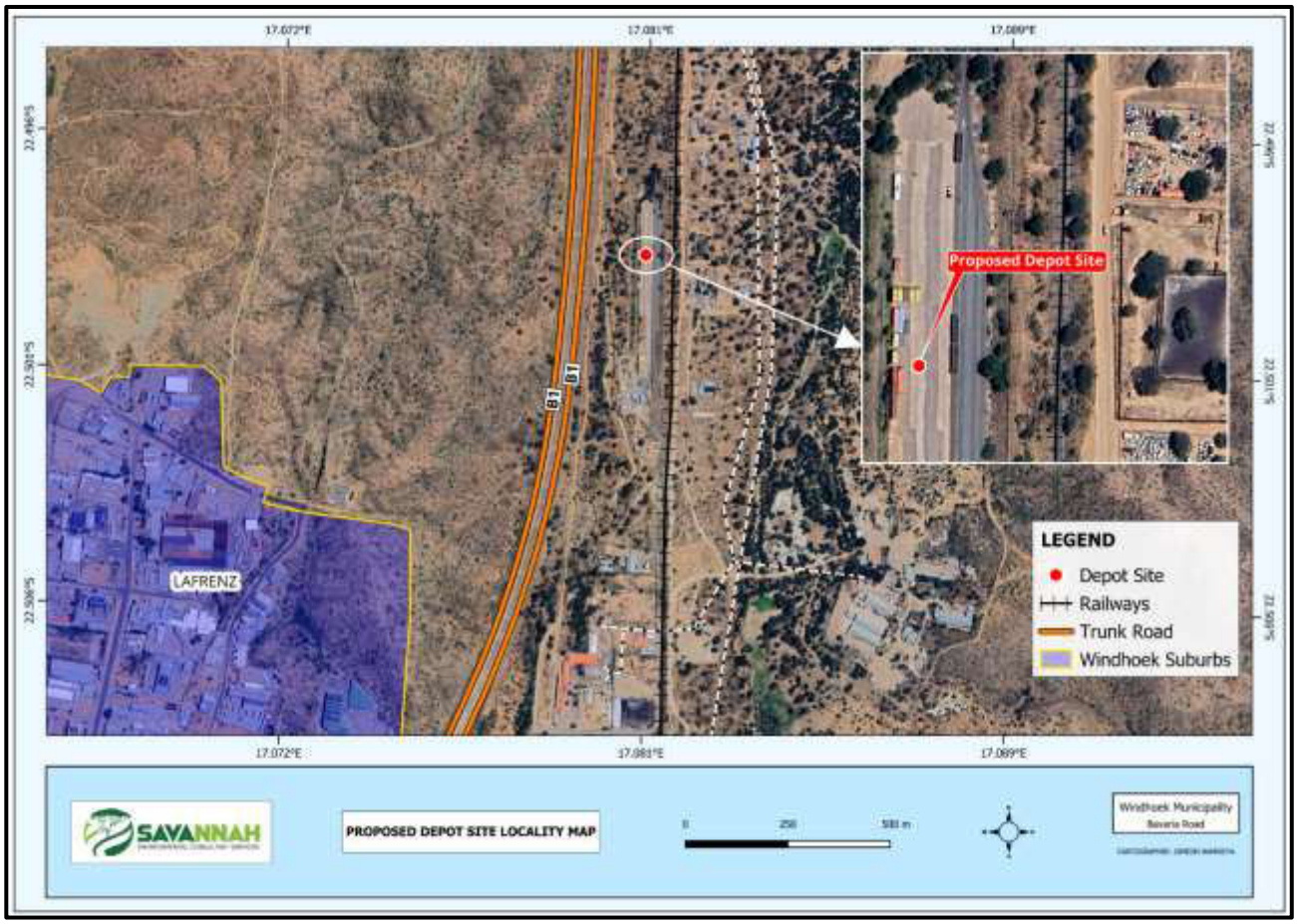


Figure 1 the locality map of proposed depot site

The proposed development and its associated activities are among the listed activities that cannot be implemented without an Environmental Clearance Certificate (ECC) being obtained from the Environmental Commissioner as per the Environmental Management Act (EMA) No. 7 of (2007) and its Environmental Impact Assessment (EIA) Regulations (GG No. 4878 GN No. 30) of 2012, thus, they require a contingency plan before commencement. 'Hazardous Substance Treatment, Handling and Storage'' and the relevant activities are as follows:

- *''9.1 The manufacturing, storage, handling or processing of a hazardous substance defined in the Hazardous Substances Ordinance, 1974.*

- *9.2 Any process or activity which requires a permit, licence or other form of authorisation, or the modification of or changes to existing facilities for any process or activity which requires an*

amendment of an existing or new permit, licence or authorisation in terms of a law governing the generation or release of emissions, pollution, effluent or waste.

- *9.4 The storage and handling of dangerous goods, including petrol, diesel liquid petroleum gas or paraffin, in containers with a combined capacity of more than 30 cubic meters at any one location.*

- *9.5 Construction of filling stations or any other facility for the underground and above ground storage of dangerous goods, including petrol, diesel, liquid, petroleum, gas or paraffin.''*

Subsequently, to comply with the EMA and its Regulations and ensure environmental management and sustainability, the Proponent appointed Savannah Environmental Consultant Services, an Independent Environmental consultant to apply for the ECC and compile a contingency Plan for the proposed activities. Once the ECC is issued by the Environmental Commissioner, the Proponent will plan for the activities and thereafter commence with its operations.

2. GUIDELINES FOR THE PROPOSED PROJECT LEGISLATION, POLICIES AND ACTS

This section outlines the relevant legal frame works that the proponent should consider once the ECC of the proposed project is renewed.

The legislations included or identified in this document, need to be honored by the proponent, during the course of the project. The legal requirements provided here are those that are required for operation and maintenance of the gas depot.

Table 1: Regulatory framework applicable to the project

Legislation / Policies / Guidelines	**Relevant Provisions**	**Relevance to Projects**
Environmental Management Act, 2007	Section 27: Requires Environmental Impact Assessments (EIAs) for activities that may impact the environment. Section 34: Requires environmental clearance certificates for activities impacting the environment.	Measures outlined in the contingency plan to mitigate impacts during the operation and mantaince should be honored.
Water Resources Management Act, 2013	Section 34: Protection of water resources from contamination and overuse.	The proponent must ensure that the mitigation measures provided in this plan for the provisions for protecting water resources during operation should be adhered to.

Pollution Control and Waste Management Bill	Provisions for waste management and pollution control.	The proponent must adhere to the waste management practices and pollution prevention measures in the this plan.
Forestry Act, 2001	Section 22: Prohibits the clearing of forest areas without proper authorization.	Should there be protected plant species, that are known to occur within the project site, and require removal for operations to occur, a permit should be obtained from the nearest Forestry Office (MEFT) prior to removal.
Soil Conservation Act, 1969	Provides measures to prevent soil erosion and degradation.	The proponent must follow the soil conservation practices stipulated in this contingency plan to minimize land degradation.
National Heritage Act, 2004	Section 46: Protects heritage and archaeological sites from damage during prospecting.	The proponent must ensure that heritage and cultural sites within the prospecting area are identified and preserved.
Atmospheric Pollution Prevention Ordinance, 1976	Controls air pollution from industrial activities.	The proponent should adhere to the measures to mitigate dust, emissions, and air pollution caused by the proposed project
Hazardous Substances Ordinance, 1974	Regulates the handling, storage, and disposal of hazardous substances.	The proponent must ensure the safe management of hazardous materials used during operation

Labour Act, 2007	Provisions for health and safety of workers.	The proponent must ensure the health and safety measures to protect workers from hazards during operation
National Development Plan (NDP 5)	Emphasizes sustainable resource use and environmental protection.	Proponent must align with Namibia's sustainable development goals.
Namibian Constitution (Article 95)	Mandates the state to protect the environment and promote sustainable development.	The proponent should reflect Namibia’s constitutional commitment to environmental protection and sustainability.

3. Contingency Plan administration

3.1 Purpose and Scope

This contingency plan is designed to outline the procedures, responsibilities, and resources required to mitigate risks, respond to emergencies, and ensure operational continuity at the gas depot station and associated infrastructures at WINCON.

Scope:

- Gas storage and handling facilities
- Associated pipelines and equipment
- Loading/unloading areas
- Control rooms and operational offices
- Nearby environmental and community impact zones

Table 2: Roles and Responsibilities in the implementation

ROLE	ENVIRONMENTAL RESPONSIBILITIES
Hakahana Lacho Power Gas CC owner (Proponent)	Responsible for enforcing mitigation measures implementation at the depot site.
Health and Safety Officer	• Implement, review, and update the mitigation measures , • Ensure all reporting and monitoring required under contingency plan is undertaken, documented, and distributed as needed

ROLE	ENVIRONMENTAL RESPONSIBILITIES
	• Conduct environmental and health site training (tool box talks) and inductions with the support of an environmental / health and safety consultant. • Close out all non-conformances. • Ensure materials being used on site are environmentally friendly and safe.
Incident Commander	• Oversees emergency responses.
Maintenance Lead	• Assesses and repairs technical issues.
The Department of Environmental Affairs	• Approve reports of environmental issues and non-conformances as issued. • Review and approve environmental reports submitted as part of contingency plan implementation
Environmental Consultant	• Conduct and monitor actions required by the contingency if required • Conduct environmental site training (tool box talks) and inductions if assistance is required • Conducts environmental audit at work site • Ensure materials being used on site are environmentally friendly and safe.
Site Technical Team	• Control and monitor actions required by the contingency • Report all environmental issues to Environmental Control Officer / health and safety officer. • Ensure documented procedures are followed and records kept on site. • Ensure any complaints are passed onto the management within 24 hours of receiving the complaint.
Casual workers	• Follow requirements as directed by site technical. • Report any potential environmental issues to site engineer/project manager, indicating spilt oil, excess waste, excessive dust generation, dirty water running off the site and other possible non-conformances
Security Coordinator	• Manages access control and external threats.
Communications Officer	• Coordinates with authorities, stakeholders, and the public.

4. Emergency Scenarios and Response Protocols

Emergency Scenarios	Detection	Response	Reporting

Gas Leak	Immediate evacuation upon alarm activation	Shut off gas supply valves; deploy emergency repair team.	Notify local authorities and regulatory bodies.
Fire or Explosion	Activate fire suppression systems	Clear the area and account for personnel (evacuate the personnels). Prevent fire spread by isolating unaffected areas to avoid contamination.	Contact emergency services.
Environmental Spill	Stop with all the work immediately.	Deploy spill containment kits and absorbents.	Notify environmental agencies and take soil/water samples. (Environmental consultant).
Power Outage	Notify all the workers on site.	Activate backup generators; prioritize essential systems.	Notify the or contact the power provide such as Nampower/city of Windhoek.
Security Breach	Set the security alarm on.	Lockdown facility.	Alert security and law enforcement;

5. Communication Plan

5.1 Internal Communication:

- Use designated radio channels or PA systems for real-time updates.
- Ensure all employees are aware of emergency codes and procedures.

5.2 External Communication:

- Establish pre-approved messages for stakeholders, media, and the public.

Coordinate with municipal and national emergency services

5.3 Training and Drills

- Conduct quarterly emergency drills simulating various scenarios.
- Provide regular training for all employees on safety and operational protocols.
- Review and update the contingency plan based on drill outcomes.

6. Management Actions

The management actions aim to avoid potential impacts where possible. Where impacts cannot be avoided, management actions are outlined in order to minimize the significant impacts.

The tables below outline the specific management actions that need to be undertaken during the operational phase of the development to ensure that the site activities are compliant.

3.1 MANAGEMENT ACTIONS DURRING OPERATIONAL PHASE

The table below outlines the management actions to be undertaken during the planning , operation and maintance phase in order to ensure that the proponent complies with the contingency plan.

Table 3: Management action during the setting up and operational phase

Impact	Description	Effects	Class	Responsibility	Action	Phase
Noise pollution	• Noise will be generated through: moving of vehicles and machinery i.e crane	• The health of working personnel could be disturbed. • Community residents could be disturbed by the noise. • General annoyance - Driving away of local animals' species near the project site	Environmental	• Health and Safety officer • Site Manager	• Workers will be issued earplugs to protect them from excessive noise. • The public will be notified through a printed timetable stating planned operational activities. • Operational activities will be conducted during the daytime, unless otherwise. • Site notices will be erected on, and around the site- notifying visitors, and nearby residents of different hazards on site. • The use of low frequency white noise or flashing lights should be considered instead of audible high frequency warning signals for moving forklifts or trucks. • Erect temporary or permanent noise barriers / sound baffles, should the need arise.	**Throughout the operational phase**

Impact	Description	Effects	Class	Responsibility	Action	Phase
Air pollution	Smoke will be generated from trucks and train driving to the site , wind blowing on loose material.	• Can lead to respiratory illnesses especially to those working in the area. • General air pollution. • Nuisance to nearby residents	Environmental	• Health and safety officer • Casual worker	• Watering down dusty surfaces, • Ensure that protective equipment such as respirators are distributed to employees, and ensure their use. • Site notices to be erected on and around the site to inform visitors and surrounding residents.	**Throughout the operational phase**
Bush /veld fires	In areas that have vegetative cover bush /veld fires may arise	This may cause property damage as well affect habitats of any animals that dwell in and round the project area	Environmental	• Health and safety officer • Site technical team • Casual worker	• Where necessary construction of fire breaks/cutlines around the site _ • Carry out awareness programs on the prevention of fire • Offer training on fire management • Service the fire extinguisher regularly • At least fifteen fire station/extinguishers must be available onsite during operational phase.	**Throughout the operational and maintained phase**

Impact	Description	Effects	Class	Responsibility	Action	Phase
Greenhouse gas emissions	Green House Gasses (GHGs) emissions will be produced from the following activities: • Fuels combustion for (machinery, vehicles and equipment) • .	• Global climate change • Air pollution	Environmental	• Health and safety officer • Casual worker • Department of Environmental Affairs.	• Adopt the use of ethanol blended fuels wherever necessary. • Design an operation system that cuts on fuel consumption. • Use of solar energy system for lighting and other minor energy needs.	**Throughout the operational phase**
Waste Generation	• Operation activities are associated with a lot of raw material and activities that results in environmental pollution i.e plastics	• Pollution from oil spills resulting from the handling of various machineries used • empty packaging containers/bags and materials remnants. •	Environmental	• Environmental Control Officer • Site Manager	• The area will be kept free of waste, except in designated waste storage areas. • A sufficient number of waste bins should be placed around the site, cleary marked as to what time of waste can be disposed. • Hazardous waste to be disposed of at the appropriate facilities of the Windhoek Municipality. • Adopt the waste management hierarchy i.e. prevention, minimisation, reuse, recycling,	**Throughout the operational phase**

Impact	Description	Effects	Class	Responsibility	Action	Phase
					energy recovery, and lastly disposal. • All project employees should be sensitized to the impacts of soil pollution and advised to follow appropriate fuel delivery and handling procedures. • Visual inspections monitoring of oil spill ,garbage and any waste • No waste must be buried on site	
Safety and Health risks	General Safety and Health hazards from the associated project activity	Injuries to workers such as Occupational dermatitis, slips and fall of humans and objects, musculoskeletal disorders, etc.	Health and safety	• Health and safety officer • Site technical team Casual worker	• Equip workers with Personal Protective Equipment (PPE), provide trainings on how to effectively use the PPE. • Provide platforms for briefings and meetings about possible safety and health hazards in the work place • Provide site signs warning and informing about different hazards on site.	**Throughout the operational phase**

Impact	Description	Effects	Class	Responsibility	Action	Phase
					• Safety signs should be put on site, no go areas should be labelled, PPE specifications should be clear to maintenance personnel. • Ensure that personnel handling the product are made aware of the risk associated with it so that they know the potential impact on them. • Report any incidents immediately. • Implement all necessary measures to ensure health and safety of the workers and the general public during operation of the project as stipulated in the relevant legislation, and company policies. • Train all workers in fire safety procedures. • Install Emergency Shut Down (ESD) at strategic point of the ISO plant.	

Impact	Description	Effects	Class	Responsibility	Action	Phase
					• Ensure regular monitoring of ISO tanks, install leakage detectors. • Enlist the services of registered oil waste handlers to manage oil waste. • Ensure the general safety and security at all times by providing day and night security guards • Provide adequate lighting within and around the premises. • Promptly detect and repair tank leaks. • Ensure personnel wears correct PPE to prevent exposure to particulate matters.	
Employment creation	The development provides an opportunity of outsourcing workers	• Improves disposable income to those employed and their immediate families.	Socio-economic	Site Manager	Work with local leadership (councillor) on acquiring non-skilled labour from the residents.	Throughout the operational phase

Impact	Description	Effects	Class	Responsibility	Action	Phase
Business linkages	Raw materials acquiring and contracting companies provide an opportunity for businesses.	• Local suppliers will be presented with an opportunity to empower their businesses. • Workers can be provided with accommodation, food and services from the local community increasing business activities.	Socioeconomic	Proponent	The proponent will outsource most of its materials and services from surrounding areas in the region.	**Throughout the operational phase**

7. MONITORING PLAN of the operation

Monitoring is very important for identifying the success of mitigation measures formulated for the significant impacts identified. Monitoring of activities will identify impacts that have not been foreseen and give enough time to analyse the situation and formulate measures to minimise impacts. Survey records and results must be maintained for these monitoring and inspections, highlighting any problems and the measures taken to address it.

The major elements of the impact monitoring programme to be implemented during the all the project phases of the project are as follows:

- Compliance of all operational phase on site with the landscape plans.
- The proponent, site technical team must immediately and completely clean up spills oil of materials and all machineries and vehicles must be equipped with drip trays to avoid oil spillage.
- Solid waste disposal practices to ensure appropriate on-site management and final disposal at approved dumping site.

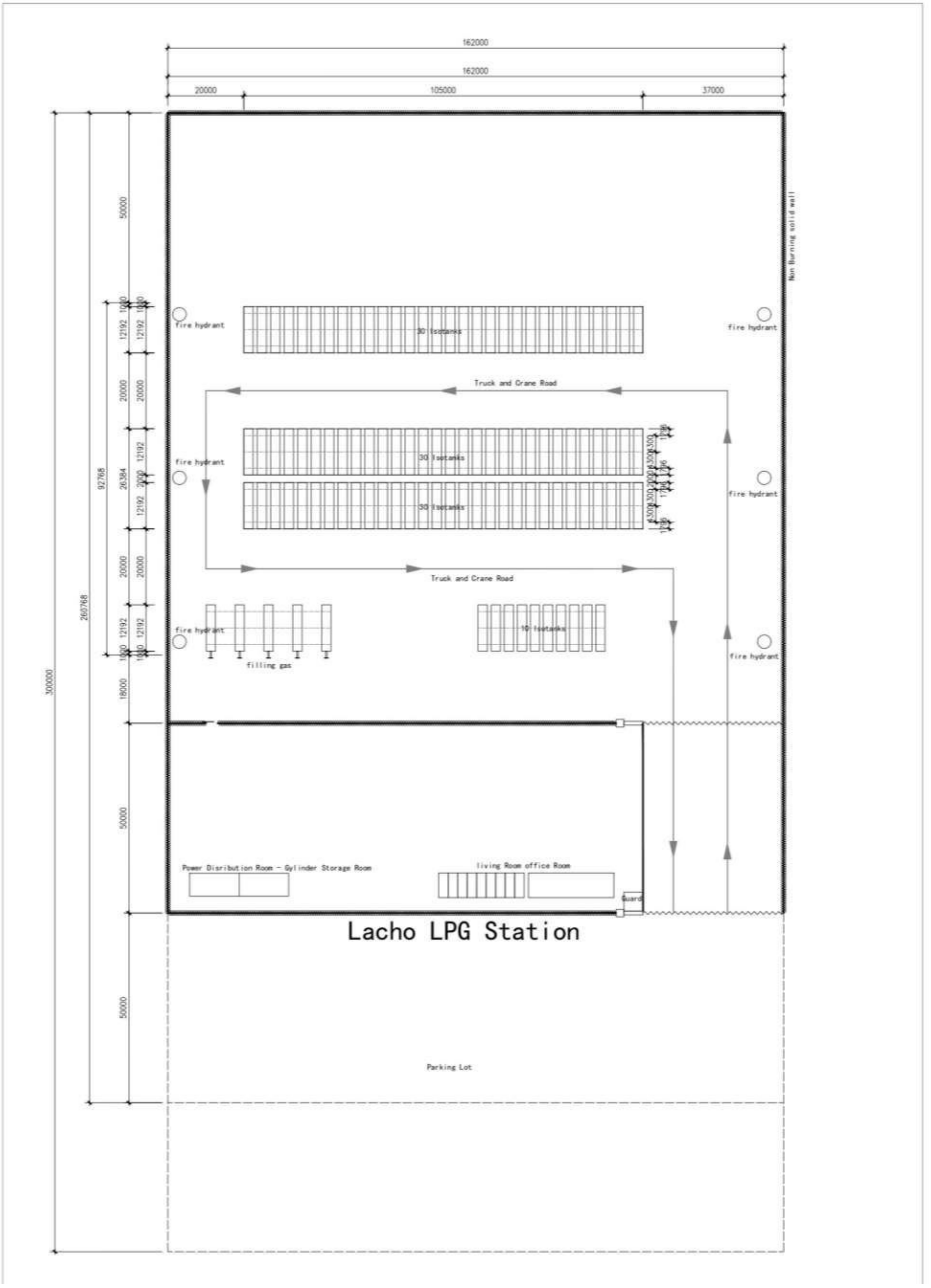
8. CONCLUSION AND RECOMMENDATIONS

The operation of Hakahana Lacho Power Gas CC at Tran-Namib Holdings Ltd at Windhoek Container Terminal point as a storage and gas distribution depot impacts that are likely to occur during project phases were assessed depicting a positive outlook despite limited details of the magnitude of the proposed development. Based on the assessment, the overall project is less damaging to the environment demonstrating improved economic development, high job creation opportunities and community development. Impacts with negative effects were also identified and summarized in a form of environmental management plan to ensure sustainable implementation.

It is important that the proponent observe and maintain accountability to both socio-economic and environmental sensitive activities from the project, such that the project is harmonized with policy, regulations, administrative frameworks and social interface with the public as proposed in the environmental management plan. Failure to observe these measures will significantly affect the local environment and lead to non-compliance. Therefore, implementation environmental protection measures should be executed in consultation with the key stakeholders.

Savannah Environmental Consulting Services cc hereby recommends that MET: DEA to renew the environmental clearance certificate for the operation and maintence of Hakahana Lacho Power Gas CC .

Appendix A Site layout



Appendix B

Resources and Equipment

On-Site Emergency Resources:

- Fire extinguishers, hydrants, and suppression systems.
- Spill containment kits and protective gear.
- Gas detectors and alarms.

Off-Site Support:

- Partnerships with local fire departments and hazardous materials teams.

Post-Incident Recovery

- Assess damage and prioritize repair/restoration efforts.
- Conduct a post-incident review to identify lessons learned.
- Update the contingency plan to address any gaps.

Regulatory Compliance and Documentation

- Ensure compliance with Namibian environmental and safety laws.
- Maintain detailed records of inspections, incidents, and training sessions.

Plan Review and Updates

This contingency plan must be reviewed annually or after any major incident. All updates will be communicated to relevant stakeholders and staff.