




## ENVIRONMENTAL MANAGEMENT PLAN (EMP)



**REVIEW OF THE THE ENVIRONMENTAL MANAGEMENT PLAN  
(EMP) FOR THE ADDITION OF 4 X NEW WAREHOUSES FOR  
NATIVE STORAGE FACILITY, FARM 38, WALVIS BAY  
MUNICIPALITY TOWN LANDS**



28 March 2025

DOCUMENT INFORMATION		
<b>Title</b>	Review of the Environmental Management Plan (EMP) for the <b>Addition of 4 x New Warehouses for Native Storage Facility</b> , Farm 38, Walvis Bay Municipality Town Lands	
<b>ECC Application Reference number</b>	<b>APP – 5360</b>	
<b>Listed Activity</b>	<b>Activity 1:</b> Energy Generation, Transmission and Storage Activities  <b>Activity 9:</b> Hazardous Substance Treatment, Handling and Storage	
<b>Location</b>	Farm 38, Walvis Bay Municipality, Erongo Region	
<b>Proponent</b>	Native Storage Facility Cc P. O. Box 80946, Walvis Bay Mr. Thomas Jonas Mobile: +264 812 327 933 Fax No: +264 886 517 450 Email: <a href="mailto:thomasj@veya.com.na">thomasj@veya.com.na</a>	
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## ACRONYMS

BID	Background Information Document
DEA	Department of Environmental Affairs
DSR	Draft Scoping Report
EA	Environmental Assessment
EAP	Environmental Assessment Practitioner
ECC	Environmental Clearance Certificate
ECO	Environmental Compliance Officer
EIA	Environmental Impact Assessment
EMA	Environmental Management Act (No. 7 of 2007)
EMP	Environmental Management Plan
I&APs	Interested and Affected Parties
MEFT	Ministry of Environment, Forestry and Tourism
NSF	Native Storage Facility
PPE	Personal Protective Equipment
SM	Site Manager
TEC	Tortoise Environmental Consultants

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## 1. INTRODUCTION

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### 1.1. Background

In 2017, Native Storage Facility (NSF) obtained an Environmental Clearance Certificate (ECC), for the storage of Ammonium Nitrate (classified as dangerous goods), at farm 38, an industrial area belonging to the Walvis Bay Municipality.

For better understanding of the storage facilities (warehouses), please refer to the visuals on pages 2 – 4 (Figures 2.1 – 2.7).

In 2024, Native Storage Facility renewed the ECC (copy attached).

### 1.2. Addition of 3rd Lease containing 4 x New Warehouses

At present Native storage has 2 Leaseholds from the Walvis bay Municipality and secured approval for a 3<sup>rd</sup> Lease, to construct 4 x new warehouses.

However, due to Safety measures and Segregation Rules (as regulated by the Explosives Act, administered by NAMPOL), they need to adhere to mandatory distances between the warehouses.

As a result, the new lease will be located about 600m away from the existing warehouses (Figure 2.1 and 2.2 on page 3 and 4).

Thus, an amendment of the current ECC is required to include the 3<sup>rd</sup> lease for the construction of 4 x new warehouses.

### 1.3. ECC Amendment

The application aims to amend the existing ECC and include the 3<sup>rd</sup> lease for the construction of 4 x new warehouses.

### 1.4. Compliance to the Explosives Act

According to NAMPOL's site visit report (dated **18 December 2024**), Native Storage is **in-compliance** with the minimum distances of **600m** between warehouses as stipulated by the **Explosives Act No. 26 of 1956**, read together with Regulations GN no: **1604 of 8/9/1972**, as corrected by GN no: **3826 of 30/03/1973**

### 1.5. Land Zonation – Walvis Bay Municipality

According to the Walvis Bay Municipality documentation, Farm 38 is zoned as Heavy Industrial.

## **1.6. Land Zonation – Dorob Park Management Plan**

According to the Park Management Plan for the Dorob National Park, farm 38 falls within an area that is classified as “Low Sensitive”.

## **1.7. Environment versus Economic Development**

Namibia’s economy is highly dependent on a healthy environment and striking a balance in meeting demands for economic development and maintaining biological diversity remains a priority. Therefore, it is of utmost importance that the environment and development sectors should work together and identify synergies to ensure that natural resources are utilized acceptably and sustainably.

The aim of undertaking environmental assessments is to mitigate negative impacts that would otherwise compromise socio-economic development.

## 2. PROJECT DESCRIPTION

### 2.1 Project Location

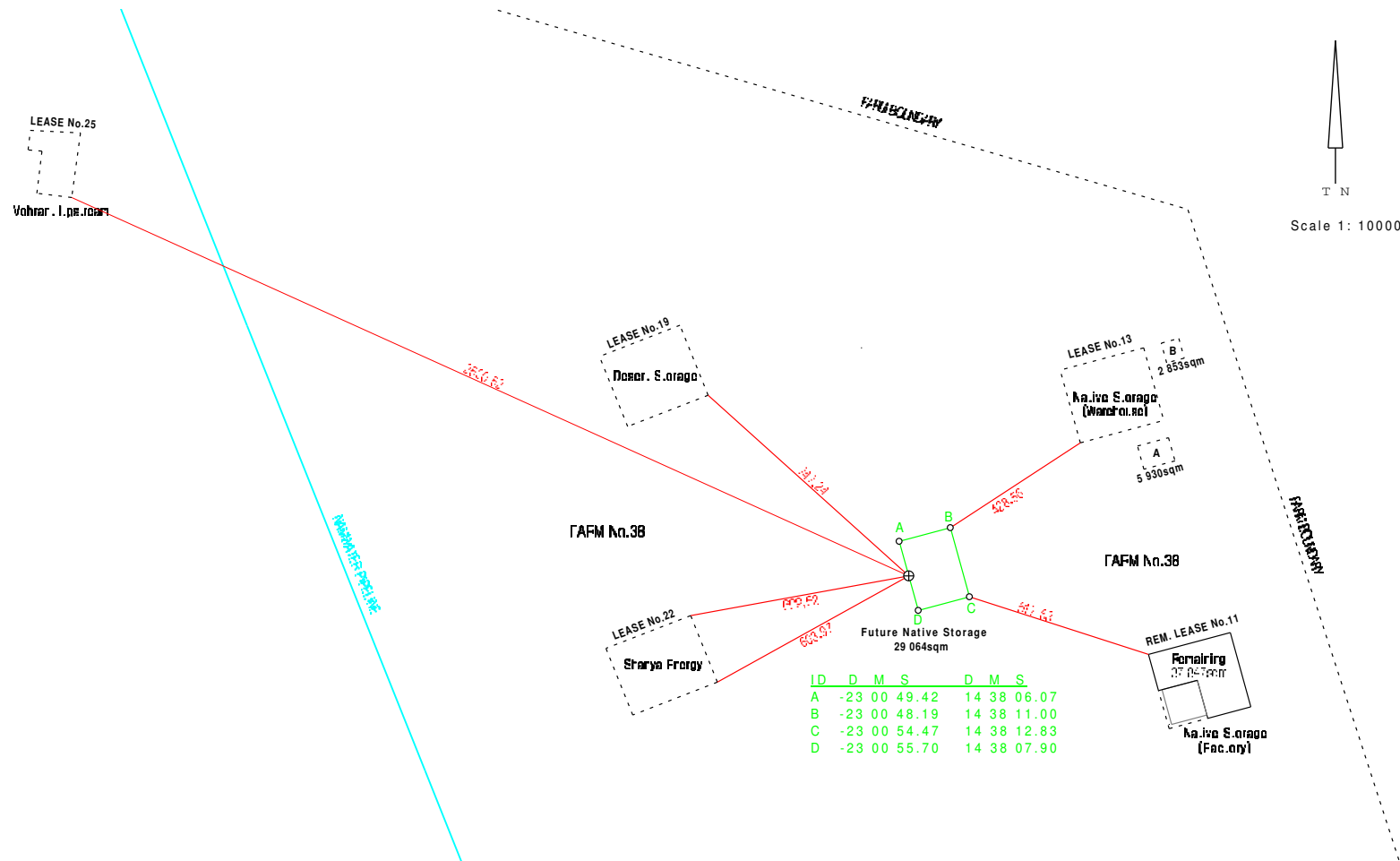


Figure 2.1: Location of existing and New Warehouses for Native Storage Facility (Farm 38, Walvis Bay Municipality)



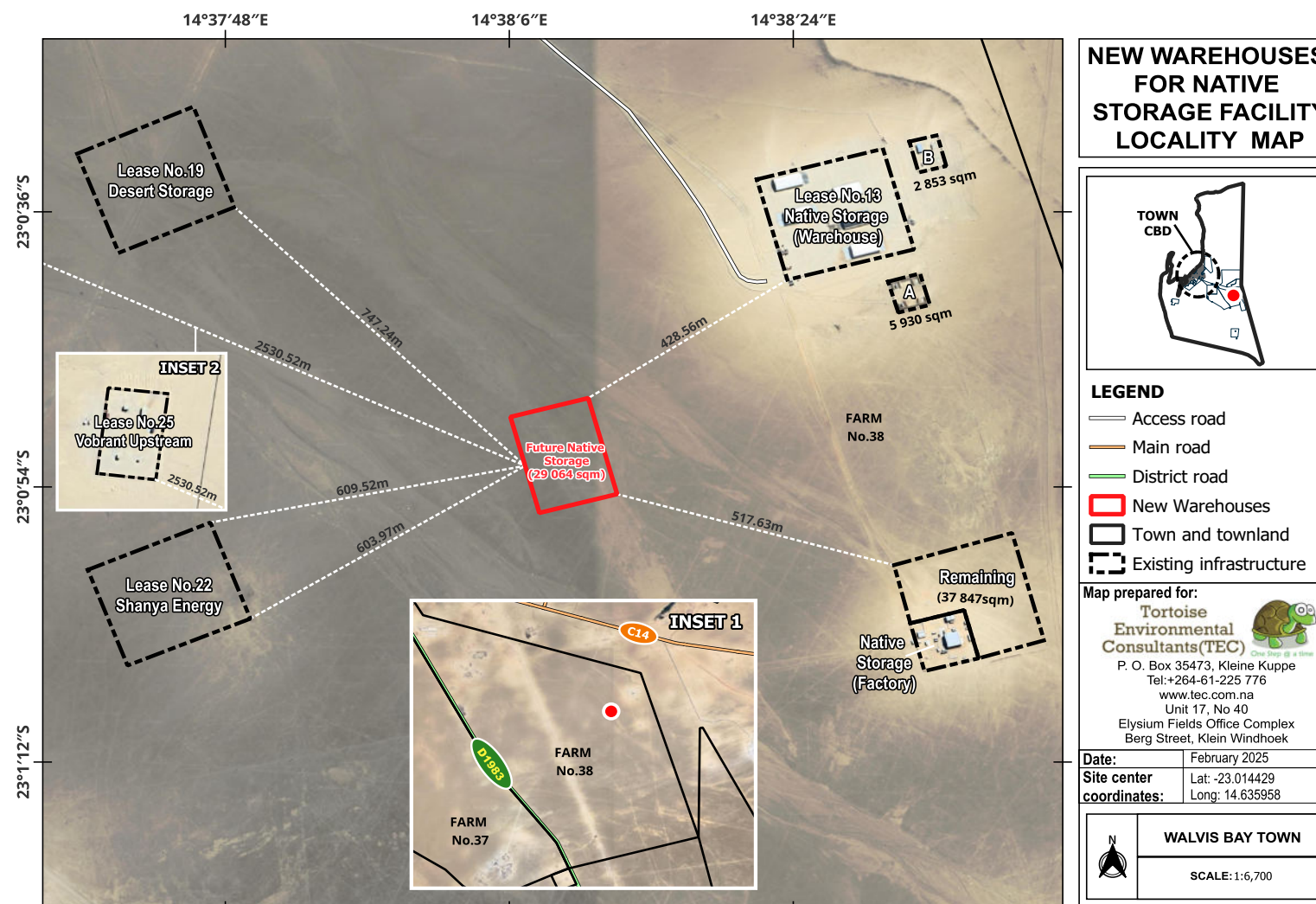


Figure 2.2: Overview of existing and the proposed New Warehouses for Native Storage Facility (Farm 38, Walvis Bay Municipality)

## 2.2 Description of Activities

The proponent is not in the import business but provides storage services for items classified as dangerous goods that are shipped through the Walvis Bay harbor daily, for both domestic (use within the country) and those in transit to other countries (particularly the landlocked countries).

The project is not a waste storage facility, but a storage facility for valuable items that are classified as dangerous goods (e.g industrial chemicals, firearms, ammunition, mining explosives etc). At present, Namport provides limited service for the storage of dangerous goods and fully supports the proposal for the establishment of the facility in context.

## 2.3 New Site



*Figure 2.3: View of the New Site for the Proposed addition of new warehouses*



*Figure 2.4: View of the New Site for the Proposed addition of new warehouses*

## 2.4 Existing infrastructure



*Figure 2.5: Sign board indicating what is stored in the facility*





*Figure 2.6: Current storage (Warehouse\_1)*



*Figure 2.7: Current storage (Warehouse\_2)*



*Figure 2.8: The inside of one of the storage facilities (Warehouse\_2)*



Figure 2.9: Containerised security office – Access Control



Figure 2.10: Storage facility for explosive magazines



Figure 2.11: Toilets for males and a septic tank

### 3. COMPLIANCE AND LEGAL FRAMEWORK

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This chapter outlines the regulatory framework applicable to the existing storage facility . Table 3.1 provides an overview of applicable policies, plans and strategies and Table 3.2 provides a list of applicable national legislation.

#### 3.1 Compliance to the EMP

The EMP is binding to the proponent, and all contractors / sub-contractors. This implies that every entity that may have any kind of engagement or involved in/with the activities of the renewal of the existing storage facility should comply with the EMP throughout the project lifespan. Non-compliance may have serious consequences e.g License withdrawal.

#### 3.2 Environmental Management Act (No.7 of 2007)

Section 27 of the Environmental Management Act 2007 (Act No. 7 of 2007) (EMA) provides a list of activities that may not be undertaken without an Environmental Clearance Certificate (ECC) (herein referred to as: listed activities). The proposed expansion of the hospital triggers the following listed activities.

The EMP should conform to the provisions of the Environmental Management Act (EMA), Act No. 7 of 2007 and EIA regulations of 2012 (Government Notice: 30).

The EIA Regulations defines a '*Management Plan*' as:

*"...a plan that describes how activities that may have significant impacts on the environment are to be mitigated controlled and monitored."*

#### 3.3 EMP Requirements

*Table 3-1: EMP Requirements as outlined in Section 8 of the EIA Regulations*

<b>Requirement</b>
<p><i>(j) a draft management plan, which includes –</i></p> <p><i>(aa) information on any proposed management, mitigation, protection or remedial measures to be undertaken to address the effects on the environment that have been identified including objectives in respect of the rehabilitation of the environment and closure;</i></p> <p><i>(bb) as far as is reasonably practicable, measures to rehabilitate the environment affected by the undertaking of the activity or specified activity to its natural or predetermined state or to a land use which conforms to the generally accepted principle of sustainable development; and</i></p>



*(cc) a description of the manner in which the applicant intends to modify, remedy, control or stop any action, activity or process which causes pollution or environmental degradation remedy the cause of pollution or degradation and migration of pollutants.*

### 3.4 Listed Activities

Listed Activities may not be undertaken without an Environmental Clearance Certificate (ECC), and hence an Environmental Impact Assessment (EIA) is required.

As the organ of the state responsible for the management and protection of its natural resources, the MET: DEA is committed to pursuing the principles of environmental management. The EMA provides a list of activities that require an EIA and wastewater treatment is among the listed activities or activities that may not be conducted without at ECC. The purpose of listed activities for projects is to ensure that the associated impacts on the environment are carefully considered.

The proposed continuation of the operation of the storage facility triggers a number of Listed Activities as set out in the Environmental Management Act, 2007 (Act No. 7 of 2007) (herein referred to as the EMA) and the Environmental Impact Assessment Regulation, 2007 (No. 30 of 2011) (herein referred to as the EIA Regulations).

*Table 3-2: Listed Activities triggered by the proposed project.*

Listed Activity	Regulation (Activity Description)	Relevance to the activity
<b>Activity 1</b> Energy Generation, Transmission and Storage Activities	1.1 The construction of facilities for - (b) the transmission and supply of electricity.	Addition of electricity connection to the existing facilities
<b>Activity 9</b> Hazardous Substance Treatment, Handling and Storage	9.4 The storage and handling of a 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.	Safe storage facility and handling of dangerous goods

### 3.5 Legal Framework Relevant to the EMP

In addition to the EMA and the Environmental Assessment Policy, there exists a host of legal and policy documents and guidelines that must be considered when undertaking an EIA as indicated in table 3.3, below.

The proponent has the responsibility to ensure that the storage facility conforms to all relevant National developmental plans and legal framework.

*Table 3-3: Other Legal Instruments / National Statutes*

<b>Legal Requirements</b>		
<b>Legislation considered</b>	<b>Relevant Organ of State / Authority</b>	<b>Aspect of Project</b>
<b>Explosives Act 26 of 1956</b>	NAMPOL	<p>Regulations and Requirements for manufacturing, storage and transportation of dangerous goods</p> <p>Refer to the Explosives Act No.26 of 1956, read together with the Regulations Government Notice no: 1604 of 8/9/1972</p>
<b>Pollution Control and Waste Management Bill (in preparation)</b>	MET, MHSS and others	<p>The Pollution Control and Waste Management Bill, aims to regulate noise, dust or odour that may be considered a nuisance, prevent the discharge of pollutants into the air or water, and licensing of waste management for any activity relating to hazardous or general waste.</p> <p>The Bill will repeal the Atmospheric Pollution Prevention Ordinance (11 of 1976) (below) when it comes into force.</p>
<b>Public Health Act (Act No. 36 of 1919)</b>	<b>Ministry of Health and Social Services</b>	<p>The Public Health Act serves to protect the public from any nuisance (noise, dust, fumes, smell, etc), or other condition liable to be injurious or dangerous to health.</p> <p>The proponent should ensure that workers are provided with protective gear to safeguard their wellbeing. The activities</p>



## 4. ENVIRONMENTAL MANAGEMENT PLAN – CONTEXT

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### 4.1 What is an EMP?

The Environmental Management Plan (EMP) is a tool used to mitigate potential environmental risks associated with the proposed project / activity, and provides a risk management strategy and logical framework for implementation of the storage facility, to mitigate potential environmental and social impacts identified during the EIA process, in accordance with the provisions of the Environmental Management Act (Act No.7 of 2007), EIA Regulations of 2012 and any other relevant / applicable legislation.

The EMP recommends mitigation measures to ensure that the activities on the storage facility are conducted in an environmentally friendly manner, and in accordance with the provisions of the Environmental Management Act and EIA regulations.

Furthermore, the EMP outlines specific roles and responsibilities for role-players against which they can be evaluated and non-compliance is punishable.

### 4.2 Purpose of the EMP

The purpose of the EMP is to identify potential environmental and social impacts associated with the storage facility, in-order to ensure compliance to the EMA, as guided by the following:

- i. Environmental Management Act (No. 7 of 2007),
- ii. EIA regulations of 2012 (GN: 30), and
- iii. Best environmental practices (benchmarks)
- iv. Any other applicable legislation (*as presented in Table 3.1 to 3.3*)

The EMP provides environmental guidelines to be followed throughout the operation of the storage facility and comprises of the following:

- a) Environmental Aspects,
- b) Management Objective,
- c) Mitigation Measures / Actions Required,
- d) Monitoring Indicators, and
- e) Party Responsible

### 4.3 Objective

The objective of the EMP is to prevent/minimize (where possible), unacceptable and adverse environmental, social or economic impacts that may arise from the continuation of the storage facility. Overall, the EMP aims to prevent any negative impact/s (real, potential or perceived) that may result from the operation of the storage facility.

### 4.4 EMP Scope

The EMP is not limited to the boundaries of the storage facility, but it includes the bigger picture, and serves as the guiding tool to protecting the natural, bio-physical and socio-economic environment on both the specific site in the surrounding area.

The bigger picture is important because some impacts may not be confined to the boundaries of the storage facility.

#### 4.5 Possible adjustments to the EMP

The EMP is an open-ended document and may be considered inconclusive. In other words, the EMP should allow room for adjustments if new information becomes available at a later stage, in which new/additional mitigation measures may become necessary.

The necessity of possible adjustments to the EMP at a later stage may be attributed to:

- a) Lack of information at the time of drafting the initial EMP,
- b) Evolution or addition of new activities, or
- c) Unintended omission of potential impacts during the initial EIA scoping exercise and development of the initial EMP.
- d) Development of industry best practices.

This implies that, in-addition to the information contained herein, any other relevant information that may surface during the construction operations, through internal monitoring or auditing by the Environmental Compliance Officers (ECOs), can be added to the EMP (evolution of activities), and such changes or inclusions will be binding to the proponent and all contractors / sub-contractors.

#### 4.6 Implementation Framework and Accountability to the EMP

For effective implementation of the EMP, the Institutional roles are presented below. However, the specific roles and responsibilities are defined and broken down as presented in Sections 4 and 5, respectively.

*Table 4-1: Role players, Institutional Framework*

Role-player	Company / Institution	Role
Proponent	Native Storage Facility (NSF)	Compliance to the EMP
Environmental Consultant	Tortoise Environmental Consultants (TEC)	Development of the EMP
Environmental Compliance Officer/s (ECO)	Ministry of Environment, Forestry & Tourism (MEFT) – Department of Environmental Affairs (DEA)	Monitoring Compliance to EMP: <ul style="list-style-type: none"> <li>➤ Un-announced spot checks,</li> <li>➤ Corrective measures, warning, penalties / fines, license suspension, etc</li> </ul>
Public	Interested and affected parties (I&APs)	Report to the ECOs, any activity of environmental concern (e.g Pollution, safety risks, etc)

## 5. ROLES AND RESPONSIBILITIES

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This section outlines the roles and responsibilities of the key personnel responsible for the day to day management of activities to ensure effective implementation of the EMP.

### 5.1 Roles and Responsibilities

Assignment of responsibilities is necessary to ensure that key procedures are followed. Ultimately, the overall responsibility for the implementation of the EMP lies with the proponent (ORTC).

To ensure accountability, it is necessary to assign responsibilities. The key role-players for project implementation are;

- a) The **Environmental Compliance Officer (ECO)** representing the Ministry of Environment, Forestry and Tourism (MET), or an appointed independent environmental officer, who is responsible for monitoring and auditing.
- b) **The Proponent: Native Storage Facility**
- c) **The Site Manager** the person responsible for the management of the existing storage facility project.

#### 5.1.1 The Environmental Compliance Officer (ECO):

The ECO refers to the party responsible for the environmental monitoring and auditing to ensure that the provisions of the EMP are complied with.

The ECO shall have adequate environmental knowledge to understand and interpret the EMP and pertaining environmental aspects associated with the project. The specific tasks of the ECO are as follows:

- To undertake all monitoring and auditing activities in-order to ensure compliance with the EMP.
- Conduct inspections and monitoring at reasonable intervals (e.g. every month, quarterly or annually), throughout the duration of the project. Depending on the risks, some projects may require regular inspections.
- Issue compliance or non-compliance orders to the proponent, contractors / sub-contractors.
- Compile compliance Reports pertaining to any non-compliance incident/s, and a Rehabilitation Report following the conclusion a specific activity.
- Liaise closely with all key stakeholders i.e. the Site Manager and the Environmental Commissioner.
- Provide guidance on any environmental management issues, incidents or emergencies that may arise throughout the project lifespan.
- Assist in providing recommendations for remedial action in the event of non-compliance.

- Auditing or monitoring activities may involve investigation, as well as structured observation, measurement, and evaluation of environmental data over a period of time.

### 5.1.2 The Proponent:

The proponent, hereinafter referred to as Native Storage Facility, shall assume overall responsibility to ensure the implementation of the EMP and will be held accountable against the remedial measures outlined herein. It is recommended that the client should appoint a Site Manager who will be responsible for monitoring daily operations.

The specific responsibilities of The Proponent are as follows:

- Appoint a Site Manager (SM) to oversee the daily onsite activities.
- Liaise closely with the SM and ECO on any environmental management issues, incidents or emergencies.
- Ensure that all activities on and around the site are conducted in accordance with the requirements of the EMP at all times.
- Ensure that all sub-contractors and visitors to the site are conversant with the requirement of the EMP, relevant to their roles on site.
- Shall develop a **communication strategy** between The Proponent, Project Manager, workers, the ECO and any other relevant stakeholder.
- Shall develop an **organisational structure** to ensure that:
  - There are clear channels of communication;
  - There is an organisational hierarchy for effective implementation of the EMP; and
  - Conflicting or contradictory instructions are eliminated;
  - Ensure that all instructions and official communications regarding environmental matters shall follow the organisational structure as determined
  - Ensure that that EMP requirements are assigned to specific people / positions with the capacity and experience required for implementation.

### 5.1.3 The Site Manager:

The **Site Manager (SM)** should:

- Ensure that each team recruited to work at the sites, adheres to the EMP;
- Ensure that a **copy of the EMP is kept on site at all times and as it may be requested by authorities conducting spot checks at any time.**
- Ensure that all staff attend an induction session before commencement of any work on site and that they are adequately informed of the requirements of the EMP;
- Take special care to prevent irreversible damage to the environment

## **5.2 Instructions**

All instructions and official communications shall follow the organisational structure as determined by the Proponent. Based on the adopted structure, it is essential that responsibilities outlined are assigned to specific parties with adequate capacity and experience required to implement the EMP.

## **5.3 Disciplinary Actions**

The EMP is a legally binding document. Non-compliance with the EMP may result in disciplinary action being taken against the Proponent. Such actions may take the form of;

- Financial penalties, Legal action, fines, and/or Suspension of work.

The disciplinary action shall be determined according to the nature and extend of the non-compliance, and exact penalties are to be weighed against the severity of the incident.

## 6. POTENTIAL IMPACTS AND MITIGATION MEASURES

### 6.1 Approach to Mitigation Measures

To enable a systematic approach to impact identification, specific aspects have been identified and for each aspect, specific mitigation measures have been recommended Table 5. It is important to note that this EMP is for the continued operation of the Storage Facility.

**Table 2.** EMP Impact Identification Section and Associated Aspects

EMP Implementation / Potential Impact Category	Specific Aspects
A. Staff Induction	EMP Provisions (Do's and Don'ts)
	HIV / AIDS
	Communication Channels
B. Operational Phase	Access Roads
	Site Demarcation
	Notice Board
C. Environment and Pollution	Vehicle emissions
	Oil Spills
	Soil Erosion
D. Health and Safety	Safety at Work Place
	Dust
	Noise
E. Socio Economic	Employment opportunities for locals
	Drug and Alcohol abuse
	Working hours
	HIV / AIDS
F. Cultural Heritage	Heritage resources / artefacts



## SECTION A: STAFF INDUCTION

Aspect	Objective	Proposes Mitigation Measures	Monitoring Indicator	Party responsible
<b>Staff induction</b>	To ensure that all staff / employees are conversant with the requirements of the EMP	<ul style="list-style-type: none"> <li>Induction for all staff / employees on the provisions of the EMP before work commencement, covering but not limited to: environmental awareness, emergency response, Reporting of incidents, HIV/AIDS awareness, alcohol and substance abuse, and Safety, Health and Environment (SHE) measures</li> <li>Staff operating equipment (such as loaders, etc.) shall be adequately trained and sensitized to any potential hazards associated with their tasks</li> <li>Quarterly induction reviews</li> </ul>	Induction Minutes and Attendance Register, Signed by each and every staff member Staff members appointed at a later stage should also undergo induction Quarterly minutes	Site Manager
	Punitive measures for staff, to ensure compliance	<ul style="list-style-type: none"> <li>Adopt a disciplinary system to discipline staff for non-compliance, such as littering, speeding, safety risk both to themselves and to others, not using ablution facilities, etc.</li> </ul>	Number of fines/warning issued daily/Monthly	Site Manager
	Availability of the EMP on site for ease of reference	<ul style="list-style-type: none"> <li>Ensure that a copy of the EMP is kept on site and accessible to team leaders</li> </ul>	Availability of EMP on site and accessibility to team leaders	Site Manager
<b>Communication</b>	To ensure effective communication throughout the project lifespan	<ul style="list-style-type: none"> <li>Develop a communication strategy (Chanel and medium of communication)</li> <li>All correspondence should be written and signed off by witnesses (e.g. Site manager)</li> <li>The contact numbers for the Site Manager or Site Foreman must be available onsite (displayed) in case of emergencies.</li> </ul>	Communication Strategy  Letters, e-mail, Notices, Minutes	Site Manager



## SECTION B: OPERATIONAL PHASE

Aspect	Objective	Action Required	Monitoring Indicator	Party responsible
<b>Access Roads</b>	Prevent driving all over the place	<ul style="list-style-type: none"> <li>• Access road are established already</li> <li>• New roads may only be established if extremely necessary (An amendment to the EMP must be done)</li> <li>• Access roads should be repaired and maintained at acceptable standards</li> <li>• All driving must strictly be on access roads</li> </ul>		Site Manager
<b>General Notice Board</b>	To notify and warn the public of the project activities	<ul style="list-style-type: none"> <li>• A general notice board is on site, and must be well maintained</li> </ul>	Notice Board – Visible and Clear	Site Manager



## SECTION C: ENVIRONMENT AND POLLUTION

Aspect	Objective	Action Required	Monitoring Indicator	Party responsible
<b>Vehicle emissions</b>	Reduce greenhouse gas (GHG) emissions from poorly maintained or malfunctioning equipment (vehicles / machinery	<ul style="list-style-type: none"> <li>All vehicles and equipment shall be kept in good working condition and serviced regularly (in accordance with the servicing frequency of the specific machinery), in order to prevent leakage and emission of poisonous smoke etc.</li> <li>Switch off engines when vehicle is not operations</li> </ul>	Vehicle servicing records  Reports of smoke emissions from machinery	Site Manager
<b>Oil Spills</b>	Manage oil spills and leak from heavy vehicles and Machinery	<ul style="list-style-type: none"> <li>Provide drip trays to prevent potential oil leakage</li> <li>Re-fuelling of machinery (e.g excavator / front loader) must be done at appropriate site with impermeable concrete bunding</li> <li>There must be an immediate spill response kit on site and ff an oil spill occurs, collect the contaminated soil, store in drums and dispose at appropriate waste disposal site (e.g. ORC disposal site)</li> </ul>	Observation of soil contamination	Site Manager
<b>Soil Erosion</b>	To mitigate soil erosion	<ul style="list-style-type: none"> <li>Only use the existing access road to and from the site, do not form other tracks</li> <li>Implement continuous rehabilitation measures</li> </ul>	Physical Observation	Site Manager
<b>Solid Waste</b>	To prevent littering, pollution, contamination of water and general environmental health hazards	<ul style="list-style-type: none"> <li>All waste produced on site should be contained and disposed as required by law.</li> <li>There must be sufficient temporally ablution facility at the site for designated for males and female.</li> </ul>	Scattered waste, Littering and any other unsightly waste at the site (eyesore)	Site Manager

## SECTION D: HEALTH AND SAFETY

Aspect	Objective	Proposed Mitigation Measures	Monitoring Indicator	Party Responsible
<b>General Safety at Work Place</b>	Ensure that the safety of workers is not compromised and adhere to the Health and Safety Regulations, Government Notice 156/1997 (GG 1617)	<ul style="list-style-type: none"> <li>Develop a Health and safety Plan (should be part of the induction)</li> <li>Ensure that every employee goes through a safety induction;</li> <li>Employees must be equipped with all necessary Personal Protective Equipment (PPE). These includes, Helmet, Overall, Safety Shoes, Safety Glasses, Gloves, Welding shield, Earmuff etc;</li> <li>Provide first aid kits to operators;</li> <li>Only qualified personnel must be allowed to operate special machinery (e.g earthmoving machinery)</li> <li>Adequate safety signs must be displayed on site.</li> </ul>	<p>Health and Safety included and reflected in the Induction Minutes</p> <p>Adequate protective gear for all staff</p> <p>Availability of the first aid kit onsite</p> <p>Record of warnings</p> <p>Visible safety signs on site</p>	Site Manager
<b>Dust</b>	Mitigate dust and noise impacts to both employees and the public	<ul style="list-style-type: none"> <li>Provide dust masks and ear muffs to all employees operating in a dusty or noisy environment</li> <li>Reduce vehicle speed on gravel roads</li> <li>All vehicles transporting sand or gravel should be covered with a tarpaulin, or any other suitable material, and,</li> <li>Industrial speed limits of 30 – 40km/h must be maintained</li> </ul>	<p>Incident Report</p> <p>Public Complains</p>	Site Manager
<b>Noise</b>		<ul style="list-style-type: none"> <li>Employees must NOT be exposed to noise levels above the required -85dB (A) limit over a period of 8 hours. Should the noise level be higher than 85dB</li> </ul>		

Aspect	Objective	Proposed Mitigation Measures	Monitoring Indicator	Party Responsible
		<p>(A), the employer must implement a hearing conservation program such as noise monitoring;</p> <ul style="list-style-type: none"> <li>• Provide worker with earmuffs</li> <li>• Vehicles and machines must be well serviced to avoid unnecessary noise emission</li> <li>• Limit the movement of earth moving machinery and heavy vehicles (tipper trucks) to daylight: 06:00AM – 18:00 PM</li> </ul>		
<b>Ablution</b>	Reduce health risks and environmental pollution	<ol style="list-style-type: none"> <li>1. Ensure adequate, hygienic (clean) and user friendly ablution facilities for all staff.</li> <li>2. Inspect ablution facilities regularly</li> </ol>	availability, cleanliness and hygienic ablution facilities	Site Manager

## SECTION E. SOCIO ECONOMIC ASPECTS

Environmental / Social Impact	Objectives	Proposed Mitigation Measures	Monitoring Indicator	Party Responsible
<b>Employment opportunities for Locals</b>	Promote benefits to the local community	<ul style="list-style-type: none"> <li>Recruit locals for unskilled labour</li> <li>Where possible, procure materials from local suppliers</li> </ul>	Employee structure and proportion of local employment	BBB
<b>Alcohol and Drug use</b>	Prevent alcohol and drug use at work	<ul style="list-style-type: none"> <li>Ban and warn the employees against the use of alcohol and drug at work</li> <li>Provide awareness on the dangers and health impacts of alcohol and drug use</li> </ul>	Drunk / Misbehaving employees  Monitor presence of alcohol at work	Site Manager
<b>Working hours</b>	Adhere to the Labour Act No. 11 of 2007	<ul style="list-style-type: none"> <li>Operate within the prescribed working days and hours as per the Namibian Labour laws and regulations</li> </ul>	Verification of working hours against the labour Act	Site Manager
<b>HIV / AIDS</b>	Provide HIV / AIDS awareness to employees	<ul style="list-style-type: none"> <li>The Ministry of Health and Social Services provides free condoms to all public amenities and health care centers.</li> <li>Arrange for HIV awareness for employees;</li> </ul>	Availability of condoms at work  Minutes for induction course	Site Manager



## SECTION F. HERITAGE AND ARCHAEOLOGY

Aspect	Objective	Action Required	Monitoring Indicator	Party responsible
<b>Heritage Resources / artefacts</b>	Reduce the impacts borehole drilling and associated earthworks on heritage resources / artefacts	<ol style="list-style-type: none"> <li>1. Heritage remains or artefacts discovered on site must be reported to the National Museum (+264 61 276800) or the National Forensic Laboratory (+264 61 240461).</li> <li>2. No artefacts must be removed or be interfered with prior to authorisation from the Namibian National Heritage Council (NHC)</li> <li>3. Recovery of heritage remains or artefacts discovered and removal thereof should be directed by the National Museum</li> </ol>	Sighting report/s of heritage resources / artefacts	Site Manager

## **7. REHABILITATION PLAN**

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Socio-economic development is very important for our livelihood and provides services that help uplift livelihoods. However, caution must always be applied to minimize detrimental impacts.

Developmental activities should therefore be conducted in a thoughtful and forward-looking manner. Rehabilitation should be part and parcel of such developmental activity right from the beginning and throughout the project lifespan.

### **7.1 What is Rehabilitation?**

Rehabilitation is the process of repairing and taking all the necessary actions to limit, minimize and mitigate the damage caused by the developmental activity, in-order to make the land suitable for other uses or to simply beautify the affected area (so that it does not become an eyesore). Rehabilitation can also be referred to as the measures taken to repair damaged environments (example refilling of excavated pits with the overburden, removal of waste construction material, cleaning up pollution etc.).

### **7.2 Designing a Rehabilitation Plan**

A rehabilitation plan refers to a set of steps or measures to be taken in-order to ensure that negative impacts associated with the development at hand are mitigated. This however requires prior planning and integration of rehabilitation activities throughout the project lifespan. Meaning, rehabilitation measures should be taken right from the beginning of the project.

The environmental characteristics of an area where a project is located plays a vital role in designing a rehabilitation plan.

## 8. CONCLUSION

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The assessment concludes that According to the NAMPOL's site visit report (dated 18 December 2024), Native Storage is in-compliance with the minimum distances of 600m between warehouses as stipulated by the Explosives Act No. 26 of 1956, read together with Regulations GN no: 1604 of 8/9/1972, as corrected by GN no: 3826 of 30/03/1973

The EMP recommends measures be implemented by proponent to continue with the storage facility. The activities must be undertaken in an environmentally friendly manner, and in accordance with the provisions of the Environmental Management Act (Act No. 7 of 2007) and EIA regulations (GN: 30 of 2012). Evaluation of the identified technologies to be implemented as long-term measures must be undertaken guided by financial feasibility.

Specific responsibilities have been assigned to individuals in-order to ensure that the EMP is implemented effectively. The key role-players should:

- **Read** the EMP (particularly the Site Manager) and ensure that they are fully conversant with the provisions of the EMP,
- If need be, **Ask for clarity** from the relevant authority (MEFT: DEA),
- Ensure implementation of the recommended mitigation measures, and
- Communicate defaults / challenges to MEFT: DEA as soon as possible.

It is recommended that the proponent monitors and conduct periodic and unannounced EMP audits throughout the proposed project lifespan, in-order to ensure compliance in-accordance with the mitigation measures prescribed in the EMP