

**APP-005686**

**ENVIRONMENTAL CLEARANCE CERTIFICATE RENEWAL FOR OPERATIONS  
OF NAMIB FUELS SERVICE STATION IN KEETMANSHOOP, //KARAS REGION**

**UPDATED ENVIRONMENTAL MANAGEMENT PLAN**



**Prepared By:**




**Prepared For:**



April 2025



<b>Project:</b>	<b>ENVIRONMENTAL CLEARANCE CERTIFICATE RENEWAL FOR OPERATIONS OF NAMIB FUELS SERVICE STATION IN KEETMANSHOOP, //KARAS REGION</b>	
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I, \_\_\_\_\_, acting as representative of Puma Energy Namibia (Pty) Ltd, hereby confirm that the project description contained in this report is a true reflection of the information which the Proponent provided to Geo Pollution Technologies. All material information in the possession of the Proponent that reasonably has or may have the potential of influencing any decision or the objectivity of this assessment is fairly represented in this report and the report is hereby approved.

Signed at Walvis Bay on the 11 day of APRIL 2025.

  
Puma Energy Namibia (Pty) Ltd

CY/1994/0600  
Business Registration/ID No.



## **TABLE OF CONTENTS**

<b>1</b>	<b>INTRODUCTION.....</b>	<b>1</b>
<b>2</b>	<b>SCOPE .....</b>	<b>2</b>
<b>3</b>	<b>PROJECT DESCRIPTION .....</b>	<b>2</b>
<b>4</b>	<b>ADMINISTRATIVE, LEGAL AND POLICY REQUIREMENTS .....</b>	<b>3</b>
<b>5</b>	<b>ENVIRONMENTAL MANAGEMENT PLAN.....</b>	<b>5</b>
5.1	IMPLEMENTATION OF THE EMP .....	5
5.1.1	<i>Planning.....</i>	5
5.1.2	<i>Employment .....</i>	7
5.1.3	<i>Revenue Generation.....</i>	8
5.1.4	<i>Skills, Technology and Development .....</i>	9
5.1.5	<i>Demographic Profile and Community Health .....</i>	10
5.1.6	<i>Fuel Supply.....</i>	11
5.1.7	<i>Traffic .....</i>	12
5.1.8	<i>Health, Safety and Security.....</i>	13
5.1.9	<i>Fire .....</i>	14
5.1.10	<i>Air Quality .....</i>	15
5.1.11	<i>Noise .....</i>	16
5.1.12	<i>Waste production .....</i>	17
5.1.13	<i>Ecosystem and Biodiversity Impact .....</i>	18
5.1.14	<i>Groundwater, Surface Water and Soil Contamination .....</i>	19
5.1.15	<i>Visual Impact.....</i>	20
5.1.16	<i>Cumulative Impact.....</i>	21
5.2	DECOMMISSIONING AND REHABILITATION .....	22
5.3	ENVIRONMENTAL MANAGEMENT SYSTEM.....	22
<b>6</b>	<b>CONCLUSION.....</b>	<b>22</b>

## **LIST OF APPENDICES**

APPENDIX A: CONSULTANT’S CURRICULUM VITAE.....	24
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## **LIST OF FIGURES**

FIGURE 2-1 PROJECT LOCATION .....	2
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## **LIST OF TABLES**

TABLE 4-1 NAMIBIAN LAW APPLICABLE TO THE FUEL RETAIL FACILITY.....	3
TABLE 4-2 RELEVANT MULTILATERAL ENVIRONMENTAL AGREEMENTS FOR NAMIBIA AND THE DEVELOPMENT.....	4
TABLE 4-3 STANDARDS OR CODES OF PRACTISE .....	4



# 1 INTRODUCTION

Geo Pollution Technologies (Pty) Ltd was appointed by Puma Energy (Namibia) (Pty) Ltd (the Proponent) to prepare an updated environmental management plan (EMP) for the continued operations of their existing fuel retail facility Namib Fuels Service Station (previously known as Deo Geo) situated on the corner of Ernest Kalweit Street and Swakara Avenue, Keetmanshoop in the //Karas Region. The updated EMP is required for the renewal of their existing environmental clearance certificate (ECC) for the facility (Figure 2-1). The Proponent intends to continue supplying fuel to customers. Together with daily operations, some maintenance and upgrades are performed on a regular basis to ensure that the facility remains compliant to industry standards, specifically South African National Standards (SANS) as prescribed by Namibian law. Operations of the facility include:

- ◆ Filling of the storage tanks with fuel from road transport tankers.
- ◆ Dispensing of fuel to customers.
- ◆ Tank dips and fuel volume reconciliation.
- ◆ General operational activities and maintenance procedures associated with the facility.

In order to comply with Namibian legislation, and to adhere to all codes and standards applied in their operations, the Proponent wishes to renew their existing environmental clearance certificate (ECC) in compliance with Namibia's Environmental Management Act (Act No 7 of 2007) (EMA) for their operations. The updated EMP will be submitted to the Ministry of Environment, Forestry and Tourism (MEFT) in order to renew the ECC. The EMP provides management options to ensure environmental impacts of the facility are minimised. The environment being defined in the Environmental Management Act as "land, water and air; all organic and inorganic matter and living organisms as well as biological diversity; the interacting natural systems that include components referred to in subparagraphs, the human environment insofar as it represents archaeological, aesthetic, cultural, historic, economic, paleontological or social values".

The EMP is thus a tool used to take pro-active action by addressing potential problems before they occur. This limits potential future corrective measures that may need to be implemented and allows for application of mitigation measures for unavoidable impacts. This document should be used as an on-site reference document during all phases (planning, construction (care and maintenance), operations and decommissioning) of the fuel retail facility. All monitoring and records kept should be included in biannual reports to ensure compliance with the EMP. Parties responsible for transgression of the EMP should be held responsible for any rehabilitation that may need to be undertaken. A safety, health, environment and quality (SHEQ) policy or similar could be used in conjunction with the EMP. Operators and responsible personnel must be taught the contents of these documents. Municipal or national regulations and guidelines must be adhered to and monitored regularly as outlined in the EMP.

**Project Justification** – Keetmanshoop plays an important part in the tourism and trade industries of Namibia. It is on the highway linking the south of Namibia with the northern regions as well as linking Namibia to South Africa and Botswana. The demand for fuel is thus increasing and the fuel retail facility contributes towards a reliable supply in this demand.

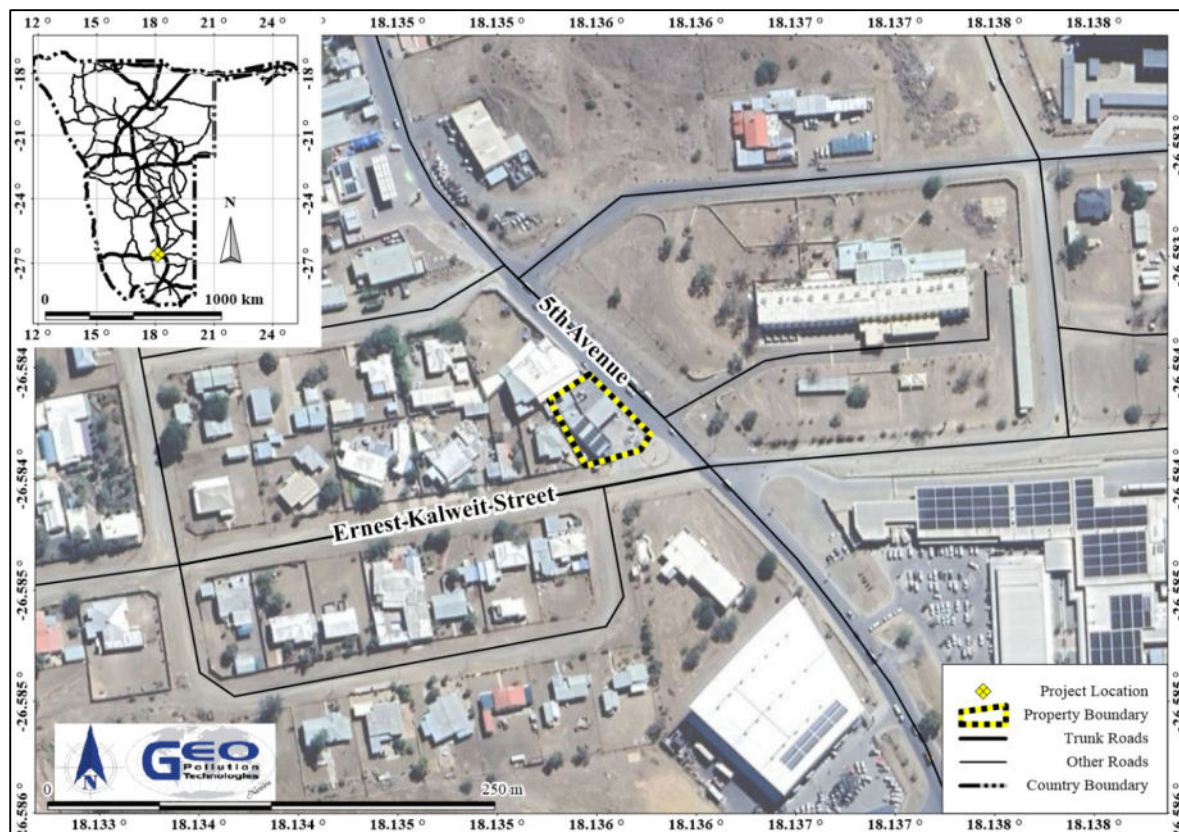
Benefits of the fuel retail facility include:

- ◆ Reliable supply of fuel to various sectors (e.g. tourism and business) and the local community,
- ◆ Employment and skills training,
- ◆ Support for potential additional investments and development in town,
- ◆ Expansion of trade and industrial activity in town.

## 2 SCOPE

The scope of this EMP, in compliance with the requirements of EMA, is to:

- ◆ Provide a brief overview of all components of the fuel retail facility.
- ◆ Update the legal and regulatory framework within which the project operates.
- ◆ Where needed update the range of management actions which could mitigate the potential adverse impacts to acceptable levels.
- ◆ To provide sufficient information to the MEFT to make informed decisions regarding the renewal of the ECC.



**Figure 2-1 Project location**

## 3 PROJECT DESCRIPTION

The Service Station is an existing site that has been in operation for more than 20 years. Operations of the facility entail fuel storage in three 23 m<sup>3</sup> underground storage tanks. Of the tanks, two are for diesel and one for unleaded petrol. Dispensing of fuel takes place underneath an overhead canopy from four dispensing units on four pump islands, as well as from a single dispensing unit on an uncovered pump island. All surfaces where fuel is handled, are covered with concrete to prevent fuel from entering the soil and environment. The concrete surfaces have catchment pits to channel any hydrocarbon contaminated liquid to an oil water separator.

Operations of the facility entail receipt of unleaded petrol and diesel by means of tanker trucks, storage of such fuel in the underground storage tanks and the dispensing of the fuel by pump attendants in the forecourt area. Daily tasks include cleaning and maintenance of the site, administrative tasks, shop operations, daily tank dips, as well as fuel volume reconciliations to detect any product losses and to ensure timely fuel delivery requests.



## 4 ADMINISTRATIVE, LEGAL AND POLICY REQUIREMENTS

To protect the environment and achieve sustainable development, all projects, plans, programmes and policies deemed to have adverse impacts on the environment require an environmental assessment, as per the Namibian legislation. The legislation and standards provided in Table 4-1 to Table 4-3 govern the environmental assessment process in Namibia and/or are relevant to the facility.

**Table 4-1 Namibian law applicable to the fuel retail facility**

Law	Key Aspects
<b>The Namibian Constitution</b>	<ul style="list-style-type: none"> <li>◆ Promote the welfare of people</li> <li>◆ Incorporates a high level of environmental protection</li> <li>◆ Incorporates international agreements as part of Namibian law</li> </ul>
<b>Environmental Management Act</b> Act No. 7 of 2007, Government Notice No. 232 of 2007	<ul style="list-style-type: none"> <li>◆ Defines the environment</li> <li>◆ Promote sustainable management of the environment and the use of natural resources</li> <li>◆ Provide a process of assessment and control of activities with possible significant effects on the environment</li> </ul>
<b>Environmental Management Act Regulations</b> Government Notice No. 28-30 of 2012	<ul style="list-style-type: none"> <li>◆ Commencement of the Environmental Management Act</li> <li>◆ List activities that requires an environmental clearance certificate</li> <li>◆ Provide Environmental Impact Assessment Regulations</li> </ul>
<b>Petroleum Products and Energy Act</b> Act No. 13 of 1990, Government Notice No. 45 of 1990	<ul style="list-style-type: none"> <li>◆ Regulates petroleum industry</li> <li>◆ Makes provision for impact assessment</li> <li>◆ Petroleum Products Regulations (Government Notice No. 155 of 2000) <ul style="list-style-type: none"> <li>○ Prescribes South African National Standards (SANS) or equivalents for construction, operation and decommissioning of petroleum facilities (refer to Government Notice No. 21 of 2002)</li> </ul> </li> <li>◆ Used Mineral Oil Regulations (Government Notice No. 48 of 1991) <ul style="list-style-type: none"> <li>○ Regulations relating to the purchase, sale, supply, acquisition, possession, disposal, storage, transportation, recovery and re-refinement of used mineral oil</li> </ul> </li> </ul>
<b>Water Resources Management Act</b> Act No. 11 of 2013	<ul style="list-style-type: none"> <li>◆ Provide for management, protection, development, use and conservation of water resources</li> <li>◆ Prevention of water pollution and assignment of liability</li> </ul>
<b>Local Authorities Act</b> Act No. 23 of 1992, Government Notice No. 116 of 1992	<ul style="list-style-type: none"> <li>◆ Define the powers, duties and functions of local authority councils</li> <li>◆ Regulates discharges into sewers</li> </ul>
<b>Public and Environmental Health Act</b> Act No. 1 of 2015, Government Notice No. 86 of 2015	<ul style="list-style-type: none"> <li>◆ Provides a framework for a structured more uniform public and environmental health system, and for incidental matters</li> <li>◆ Deals with Integrated Waste Management including waste collection disposal and recycling; waste generation and storage; and sanitation</li> </ul>
<b>Labour Act</b> Act No 11 of 2007, Government Notice No. 236 of 2007	<ul style="list-style-type: none"> <li>◆ Provides for Labour Law and the protection and safety of employees</li> <li>◆ Labour Act, 1992: Regulations relating to the health and safety of employees at work (Government Notice No. 156 of 1997)</li> </ul>

Law	Key Aspects
<b>Atmospheric Pollution Prevention Ordinance</b> Ordinance No. 11 of 1976	<ul style="list-style-type: none"> <li>◆ Governs the control of noxious or offensive gases</li> <li>◆ Prohibits scheduled process without a registration certificate in a controlled area</li> <li>◆ Requires best practical means for preventing or reducing the escape into the atmosphere of noxious or offensive gases produced by the scheduled process</li> </ul>
<b>Hazardous Substances Ordinance</b> Ordinance No. 14 of 1974	<ul style="list-style-type: none"> <li>◆ Applies to the manufacture, sale, use, disposal and dumping of hazardous substances as well as their import and export</li> <li>◆ Aims to prevent hazardous substances from causing injury, ill-health or the death of human beings</li> </ul>
<b>Pollution Control and Waste Management Bill (draft document)</b>	<ul style="list-style-type: none"> <li>◆ Not in force yet</li> <li>◆ Provides for prevention and control of pollution and waste</li> <li>◆ Provides for procedures to be followed for licence applications</li> </ul>

**Table 4-2 Relevant multilateral environmental agreements for Namibia and the development**

Agreement	Key Aspects
<b>Stockholm Declaration on the Human Environment, Stockholm 1972.</b>	<ul style="list-style-type: none"> <li>◆ Recognizes the need for a common outlook and common principles to inspire and guide the people of the world in the preservation and enhancement of the human environment</li> </ul>
<b>1985 Vienna Convention for the Protection of the Ozone Layer</b>	<ul style="list-style-type: none"> <li>◆ Aims to protect human health and the environment against adverse effects from modification of the Ozone Layer are considered</li> <li>◆ Adopted to regulate levels of greenhouse gas concentration in the atmosphere</li> </ul>
<b>United Nations Framework Convention on Climate Change (UNFCCC)</b>	<ul style="list-style-type: none"> <li>◆ The Convention recognises that developing countries should be accorded appropriate assistance to enable them to fulfil the terms of the Convention</li> </ul>
<b>Convention on Biological Diversity, Rio de Janeiro, 1992</b>	<ul style="list-style-type: none"> <li>◆ Under article 14 of The Convention, EIAs must be conducted for projects that may negatively affect biological diversity</li> </ul>

**Table 4-3 Standards or codes of practise**

Standard or Code	Key Aspects
<b>South African National Standards (SANS)</b>	<ul style="list-style-type: none"> <li>◆ The Petroleum Products and Energy Act prescribes SANS standards for the construction, operations and demolition of petroleum facilities</li> <li>◆ SANS 10089-3:2010 is specifically aimed at storage and distribution of petroleum products at fuel retail facilities and consumer installations <ul style="list-style-type: none"> <li>○ Provide requirements for spill control infrastructure</li> </ul> </li> </ul>

The fuel retail facility is listed as an activity requiring an environmental clearance certificate as per the following points from Section 9 of Government Notice No. 29 of 2012:

Hazardous Substance Treatment, Handling and Storage

- ◆ 9.1 “The manufacturing, storage, handling or processing of a hazardous substance defined in the Hazardous Substances Ordinance, 1974.” (The facility store and handle hazardous substances in the form of fuel.)
- ◆ 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 permit, licence or authorisation or which requires a new permit, licence

or authorisation in terms of a law governing the generation or release of emissions, pollution, effluent or waste.” (The facility store and handle hazardous substances in the form of fuel which is permitted by the Ministry of Mines and Energy.)

- ◆ 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.” (Total storage capacity for fuel exceed 30 m<sup>3</sup>).
- ◆ 9.5 “Construction of filling stations or any other facility for the underground and aboveground storage of dangerous goods, including petrol, diesel, liquid petroleum gas or paraffin.” (The facility is a filling station that stores diesel and unleaded petrol below ground.)

## 5 ENVIRONMENTAL MANAGEMENT PLAN

The EMP provides management options to ensure impacts of the facility are minimised. An EMP is a tool used to take pro-active action by addressing potential problems before they occur. This should limit the corrective measures needed, although additional mitigation measures might be included if necessary. The environmental management measures are provided in the tables and descriptions below. These management measures should be adhered to during the various phases of the operations of the facility. All personnel taking part in the operations of the facility should be made aware of the contents in this section, so as to plan the operations accordingly and in an environmentally sound manner.

The objectives of the EMP are:

- ◆ to include all components of operations, maintenance and possible decommissioning of the facility,
- ◆ to prescribe the best practicable control methods to lessen the environmental impacts associated with the facility,
- ◆ to monitor and audit the performance of operational personnel in applying such controls; and
- ◆ to ensure that appropriate environmental training is provided to responsible operational personnel.

### 5.1 IMPLEMENTATION OF THE EMP

The section below outline the management of the environmental elements that may be affected by the different activities. Impacts addressed and mitigation measures proposed are seen as minimum requirements which have to be elaborated on. Delegation of mitigation measures and reporting activities should be determined by the Proponent and included in the EMP. The EMP is a living document that must be prepared in detail, and regularly updated, by the Proponent as the project progress and evolve.

The EMP and ECC must be communicated to the site managers. A copy of the ECC and EMP should be kept on site. All monitoring results must be reported on as indicated. Reporting is important for any future renewals of the ECC and must be submitted to the Ministry of Environment, Forestry and Tourism. Renewal of ECC will require six monthly reports based on the standard conditions of ECCs.

Various potential and definite impacts will emanate from the operations and decommissioning phases. The majority of these impacts can be mitigated or prevented. The prevention and mitigation measures are listed below.

#### 5.1.1 Planning

During the phases of planning for construction (upgrades, maintenance etc.) continued operations and possible future decommissioning of the facility, it is the responsibility of Proponent to ensure they are, and remain, compliant with all legal requirements. The Proponent must also ensure that all required management measures are in place prior to, and during all phases, to ensure potential impacts and risks are minimised. The following actions are recommended for the planning phase and should continue during various other phases of the project:

- ◆ Ensure that all necessary permits from the various ministries, local authorities and any other bodies that governs the operations of the facility are in place and remains valid. This includes the petroleum products licence.

- ◆ Ensure all appointed contractors and employees enter into an agreement which includes the EMP. Ensure that the contents of the EMP are understood by the contractors, sub-contractors, employees and all personnel present or who will be present on site.
- ◆ Make provisions to have a health, safety and environmental (HSE) coordinator to implement the EMP and oversee occupational health and safety as well as general environmental related compliance at the site.
- ◆ Have the following emergency plans, equipment and personnel on site, where reasonable, to deal with all potential emergencies:
  - EMP, risk management, mitigation, emergency response plan and HSE manuals
  - Adequate protection and indemnity insurance cover for incidents;
  - Provisions of all relevant safety standards;
  - Procedures, equipment and materials required for emergencies.
- ◆ If one has not already been established, establish and maintain a fund for future restoration of the project site should project activities cease and the site is decommissioned and environmental restoration or pollution remediation is required.
- ◆ Establish and/or maintain a bi-annual reporting system to report on aspects of operations, maintenance and decommissioning as outlined in the EMP.
- ◆ Submit bi-annual reports to the MEFT to allow for environmental clearance certificate renewal after three years. This is a requirement by MEFT.
- ◆ Appoint a specialist environmental consultant to update the EMP and apply for renewal of the environmental clearance certificate prior to expiry.

### **5.1.2 Employment**

Continued operations and maintenance of the facility relies on employment. Skilled and unskilled labourers are employed or contracted for various tasks of operations and maintenance. Unskilled labour may be sourced locally while it is expected that skilled contractors within Namibia will be used for specialised work. The presence of the facility therefore contributes to employment creation in the skilled and unskilled labour sector.

**Desired Outcome:** Provision of employment to local Namibians.

#### **Actions**

##### **Enhancement:**

- ◆ The Proponent must employ local Namibians where possible.
- ◆ If the skills exist locally, employees must first be sourced from the town, then the region and then nationally.
- ◆ Deviations from this practice must be justified.

##### **Responsible Body:**

- ◆ Proponent

##### **Data Sources and Monitoring:**

- ◆ Bi-annual summary report based on employee records.

### **5.1.3 Revenue Generation**

Retailing of fuel contributes to revenue generation which is paid to the national treasury while also contributing to the local economy in terms of increased spending power of employees as well as the sourcing of goods and services.

**Desired Outcome:** Contribution to national treasury and remuneration in accordance with Namibian law

#### **Actions**

##### **Enhancement:**

- ◆ The Proponent must employ or contract local Namibians where possible.
- ◆ Payment of taxes, levies, salaries, etc. in accordance with Namibian law.
- ◆ Sourcing of local goods and services as far as is practically possible.

##### **Responsible Body:**

- ◆ Proponent

##### **Data Sources and Monitoring:**

- ◆ Bi-annual summary report based on employee records.

#### **5.1.4 Skills, Technology and Development**

During operations of the facility, training is provided to a portion of the workforce to be able to perform their duties according to the required standards. Skills are transferred to an unskilled workforce for general tasks. Development of people and technology are key to economic development of the town, region and nationally.

**Desired Outcome:** To see an increase in skills of local Namibians, as well as development and technology advancements in the fuel industry.

#### **Actions**

##### **Enhancement:**

- ◆ If the skills exist locally, contractors and employees must first be sourced from the town, region, and then nationally. Deviations from this practice must be justified.
- ◆ Skills development and improvement programs to be made available as identified during performance assessments.
- ◆ Employees to be informed about parameters and requirements for references upon employment.

##### **Responsible Body:**

- ◆ Proponent

##### **Data Sources and Monitoring:**

- ◆ Record should be kept of training provided.
- ◆ Ensure that all training is certified or managerial reference provided (proof provided to the employees) inclusive of training attendance, completion and implementation.
- ◆ Bi-annual summary reports on all training conducted.

### 5.1.5 Demographic Profile and Community Health

The facility relies on labour for operations. The scale of the project is limited and it is not foreseen that it has or will in future create a change in the demographic profile of the local community. Exposure to factors such as communicable disease like HIV/AIDS as well as alcoholism / drug abuse are often associated with the trucking industry. Spills and leaks may present risks to members of the public especially if groundwater is polluted.

**Desired Outcome:** To prevent the in-migration and growth in informal settlements and to prevent the spread of diseases such as HIV/AIDS.

**Actions:**

**Prevention:**

- ◆ Employ only local people from the area, deviations from this practice should be justified appropriately.
- ◆ Adhere to all municipal by-laws relating to environmental health which includes, but is not limited to, sand and grease traps for the various facilities and sanitation requirements.

**Mitigation:**

- ◆ Educational programmes for employees on HIV/AIDs and general upliftment of employees' social status.
- ◆ Appointment of reputable contractors.

**Responsible Body:**

- ◆ Proponent

**Data Sources and Monitoring:**

- ◆ Facility inspection sheet for all areas which may present environmental health risks, kept on file.
- ◆ Bi-annual summary report based on educational programmes and training conducted.
- ◆ Bi-annual report and review of employee demographics.



### **5.1.6 Fuel Supply**

The facility contributes to ensuring a reliable and convenient supply of fuel to the town, local businesses, farmers and residents, the tourism industry and the transport industry.

**Desired Outcome:** Ensure a secure fuel supply remains available.

#### **Actions**

##### **Enhancement:**

- ◆ Ensure compliance to the petroleum regulations of Namibia which specify adherence to SANS standards for fuel retail facilities.
- ◆ Proper management to ensure constant and reliable supply.
- ◆ Record supply problems and take corrective actions.
- ◆ Communicate any fuel shortages and expected delays in supply at a visible location on site.

##### **Responsible Body:**

- ◆ Proponent

##### **Data Sources and Monitoring:**

- ◆ Record supply problems and corrective actions taken and compile a bi-annual summary report.

### 5.1.7 Traffic

The presence of the facility increase traffic flow in the area. This may increase the risk of incidents and accidents especially during the fuel deliveries. Construction activities (upgrades) may result in temporary traffic impacts as a result of large vehicles accessing the site for delivery and collection of equipment and machinery.

**Desired Outcome:** Minimum impact on traffic and no transport or traffic related incidents.

#### **Actions**

##### **Prevention:**

- ◆ Erect clear signage regarding access and exit points at the facility.
- ◆ Tanker trucks collecting and delivering fuel should not be allowed to obstruct any traffic.

##### **Mitigation:**

- ◆ If any traffic impacts are expected, traffic management should be performed.
- ◆ Ensure enough pump attendants are on duty when more patrons than usual are expected, such as before fuel price increases come into effect.

#### **Responsible Body:**

- ◆ Proponent

#### **Data Sources and Monitoring:**

- ◆ Any complaints received regarding traffic issues should be recorded together with action taken to prevent impacts from repeating itself.
- ◆ A report should be compiled bi-annually of all incidents reported, complaints received, and action taken.

### 5.1.8 Health, Safety and Security

Activities associated with the construction and operational phases relies on human labour and therefore will expose them to health and safety risks. Health and safety risk associated with the construction activities include excavation activities during tank removal and installation, falling from heights and moving vehicles. Handling of hazardous chemicals (inhalation and carcinogenic effect of some petroleum products), will pose the main risks to employees during the operational phases. Security risks will be related to unauthorized entry, theft and sabotage.

**Desired Outcome:** To prevent injury, health impacts and theft.

#### **Actions**

##### **Prevention:**

- ◆ Implement and maintain an integrated health and safety management system, to act as a monitoring and mitigating tool, which includes: colour coding of pipes, operational, safe work and medical procedures, permits to work, emergency response plans, housekeeping rules, MSDS's and signage requirements (PPE, flammable etc.).
- ◆ All health and safety standards specified in the Labour Act should be complied with.
- ◆ Clearly label dangerous and restricted areas as well as dangerous equipment and products, especially during the construction phase.
- ◆ Equipment on site must be locked away or placed in a way that does not encourage criminal activities (e.g. theft).
- ◆ Provide all employees with required and adequate personal protective equipment (PPE).
- ◆ Ensure that all personnel receive adequate training on operation of equipment/handling of hazardous substances.
- ◆ Implementation of maintenance register for all equipment and fuel / hazardous substance storage areas.
- ◆ Selected personnel should be trained in first aid and a first aid kit must be available on site. The contact details of all emergency services must be readily available.
- ◆ Security procedures and proper security measures must be in place to protect workers and clients.
- ◆ Develop emergency response plans for all possible health, safety and security impacts and appoint responsible personnel in key positions to activate and oversee such plans when required.

##### **Mitigation:**

- ◆ For all emergency situations, the appropriate emergency response plan must be implemented as soon as possible in order to minimize the magnitude of impacts or prevent such impacts from developing into more severe impacts.

##### **Responsible Body:**

- ◆ Proponent

##### **Data Sources and Monitoring:**

- ◆ Any incidents must be recorded with action taken to prevent future occurrences.
- ◆ A report should be compiled bi-annually of all incidents reported. The report should contain dates when training were conducted and when safety equipment and structures were inspected and maintained.

### 5.1.9 Fire

Construction and operational activities may increase the risk of the occurrence of fires. Unleaded petrol is extremely flammable and being a static accumulator may ignite if handled incorrectly.

**Desired Outcome:** To prevent property damage, possible injury and impacts caused by uncontrolled fires.

#### **Actions:**

##### **Prevention:**

- ◆ A holistic fire protection and prevention plan must be developed for the site and it should specifically take into account flammable products stored on site. This plan must include an emergency response plan, firefighting plan and a spill recovery plan and should have dedicated assigned personnel to oversee their development and implementation.
- ◆ Firefighting equipment must be maintained and regularly serviced.
- ◆ Regular personnel training (firefighting, fire prevention and responsible housekeeping practices). The importance of grounding portable fuel tanks, and only dispensing of fuel into authorised containers, must be made clear.
- ◆ Ensure all chemicals are stored strictly according to MSDS and SANS instructions. This include segregation of incompatible products.
- ◆ Maintain regular site, mechanical and electrical inspections and perform regular maintenance.
- ◆ Clean all spills/leaks without delay and dispose of any contaminated material according to their MSDS requirements and at suitable locations to prevent the accumulation of flammable or explosive products on site.
- ◆ For fuel storage, special note must be taken of the regulations stipulated in sections 47 and 48 of the Petroleum Products and Energy Act, 1990 (Act No. 13 of 1990) and SANS standards for operation and maintenance of the consumer fuel installation should be followed.

##### **Mitigation:**

- ◆ For any fire related emergency situation, the appropriate emergency response plan must be implemented as soon as possible in order to minimize the magnitude of impacts or prevent such impacts from developing into more severe impacts.

#### **Responsible Body:**

- ◆ Proponent

#### **Data Sources and Monitoring:**

- ◆ A register of all incidents must be maintained on a daily basis. This should include measures taken to ensure that such incidents do not repeat themselves.
- ◆ A report should be compiled bi-annually of all incidents reported. The report should contain dates when fire drills were conducted and when fire equipment was tested and training given.

#### **5.1.10 Air Quality**

The operational phase release fuel vapours into the air during refuelling of bulk storage tanks as well as at dispensing points. Prolonged exposure may have carcinogenic effects. Construction and refurbishment activities may cause dust where soil surfaces are exposed.

**Desired Outcome:** To prevent health impacts related to reduced air quality.

#### **Actions**

##### **Mitigation:**

- ◆ Employees should be informed about the dangers of fuel vapours.
- ◆ Vent pipes must be properly placed as per SANS requirements.
- ◆ Dust masks should be provided to employees where dust impacts are expected and dust suppression by means of water implemented.

##### **Responsible Body:**

- ◆ Proponent

##### **Data Sources and Monitoring:**

- ◆ Any complaints received regarding fuel vapours or dust should be recorded with notes on action taken.
- ◆ All information and reporting to be included in a bi-annual report.

### 5.1.11 Noise

Noise pollution may be generated due to heavy and light motor vehicles accessing the site to offload fuel or refuel. Construction and refurbishment activities may result in a temporary increase in noise levels.

**Desired Outcome:** To prevent any nuisance and hearing loss due to noise generated.

#### **Actions**

##### **Prevention:**

- ◆ Follow Health and Safety Regulations of the Labour Act and World Health Organization (WHO) guidelines on maximum noise levels (Guidelines for Community Noise, 1999) to prevent hearing impairment and a nuisance.
- ◆ All machinery must be regularly serviced to ensure minimal noise production.
- ◆ Keep volume of public address systems on a level where neighbours are not impacted on.
- ◆ Manage noise caused by clients – loud music etc.

##### **Mitigation:**

- ◆ Hearing protectors as standard PPE for workers in situations with elevated noise levels.

##### **Responsible Body:**

- ◆ Proponent

##### **Data Sources and Monitoring:**

- ◆ Health and Safety Regulations of the Labour Act and WHO Guidelines.
- ◆ Maintain a complaints register.
- ◆ Bi-annual report on complaints and actions taken to address complaints and prevent future occurrences.

### 5.1.12 Waste production

Waste is produced during the operational phase. Waste includes hazardous waste associated with the handling of hydrocarbon products and servicing of vehicles. Maintenance waste may include building rubble and discarded equipment contaminated by hydrocarbon products. Contaminated soil and water is considered as hazardous waste. Domestic waste will be generated by the facility and related operations. Waste presents a contamination risk and when not removed regularly may become a fire hazard.

**Desired Outcome:** To reduce the amount of waste produced and prevent pollution and littering.

#### **Actions**

##### **Prevention:**

- ◆ Waste reduction measures should be implemented and all waste that can be re-used/recycled must be kept separate.
- ◆ Ensure adequate waste storage facilities are available.
- ◆ Ensure waste cannot be blown away by wind.
- ◆ Prevent scavenging (human and non-human) of stored waste.

##### **Mitigation:**

- ◆ Waste should be disposed of regularly and at appropriately classified disposal facilities, this includes hazardous material (empty chemical containers, contaminated rugs, paper water and soil).
- ◆ See the MSDS available from suppliers for disposal of contaminated products and empty containers.
- ◆ Liaise with the town council regarding waste and handling of hazardous waste.

##### **Responsible Body:**

- ◆ Proponent
- ◆ Contractors

##### **Data Sources and Monitoring:**

- ◆ A register of hazardous waste disposal should be kept. This should include type of waste, volume as well as disposal method/facility.
- ◆ Any complaints received regarding waste should be recorded with notes on action taken.
- ◆ All information and reporting to be included in a bi-annual report.

### 5.1.13 Ecosystem and Biodiversity Impact

The site has previously been developed and is mostly devoid of vegetation. The nature of the operational activities is such that the probability of creating a habitat for flora and fauna to establish is low. Ecosystem or biodiversity impacts are mostly associated with pollution of the environment.

**Desired Outcome:** To avoid pollution of, and impacts on, the ecological environment.

**Actions.**

**Prevention:**

- ◆ Educate all contracted and permanent employees on the value of biodiversity.

**Mitigation:**

- ◆ Contain construction material and activities on site.
- ◆ Report any extraordinary animal sightings to the MEFT.
- ◆ Mitigation measures related to waste handling and the prevention of groundwater, surface water and soil contamination should limit ecosystem and biodiversity impacts.
- ◆ Prevent scavenging of waste by fauna.
- ◆ The establishment of habitats and nesting sites at the facility should be prevented where possible.

**Responsible Body:**

- ◆ Proponent

**Data Sources and Monitoring:**

- ◆ Any ecologically significant events or sightings to be included in a bi-annual report.



#### **5.1.14 Groundwater, Surface Water and Soil Contamination**

Operations entails the storage and handling of various hydrocarbons (such as fuels and lubricants). Such material may contaminate surface water, soil and groundwater. Contamination may either result from failing storage facilities and reticulation, or spills and leaks associated construction activities and with fuel handling such as overfills and spills.

**Desired Outcome:** To prevent the contamination of water and soil.

##### **Actions**

##### **Prevention:**

- ◆ Proper training of operators must be conducted on a regular basis (fuel handling, spill detection, spill control).
- ◆ Spill control structures and procedures must be in place according to SANS standards or better and connection of all surfaces where fuel is handled, with an oil water separator.
- ◆ Surfactants (soap) should not be allowed to enter the oil water separator as this will decrease its efficiency.
- ◆ The procedures followed to prevent environmental damage during service and maintenance, and compliance with these procedures, must be audited and corrections made where necessary.

##### **Mitigation:**

- ◆ Any spillage of more than 200 l must be reported to the Ministry of Mines and Energy.
- ◆ Spill clean-up means must be readily available on site as per the relevant MSDS and all spills must be cleaned up immediately.

##### **Responsible Body:**

- ◆ Proponent

##### **Data Sources and Monitoring:**

- ◆ Daily tank inspections and dips to detect product loss due to leaks as soon as possible.
- ◆ A report should be compiled bi-annually of all spills or leakages reported. The report should contain the following information: date and duration of spill, product spilled, volume of spill, remedial action taken, comparison of pre-exposure baseline data (previous pollution conditions survey results) with post remediation data (e.g. soil / groundwater hydrocarbon concentrations) and a copy of documentation in which spill was reported to Ministry of Mines and Energy.

#### **5.1.15 Visual Impact**

This is an impact that not only affects the aesthetic appearance, but also the integrity of the facility. The general upkeep and maintenance of the facility will not only reduce any negative visual impacts, but also ensure the longevity of the structures and buildings. Proposed upgrades will have a positive visual impact.

**Desired Outcome:** To minimise aesthetic impacts associated with the facility and prevent lighting from being a visual disturbance.

#### **Actions**

##### **Mitigation:**

- ◆ Regular waste disposal, good housekeeping and routine maintenance on infrastructure will ensure that the longevity of structures are maximised and a low visual impact is maintained.
- ◆ Lighting should be directed towards the facility and away from residents where possible.
- ◆ Minimum lighting necessary for operations to be used at night. The installation of auto-dimming lights when no movement is detected are desirable.

##### **Responsible Body:**

- ◆ Proponent

##### **Data Sources and Monitoring:**

- ◆ A report should be compiled every bi-annually of all complaints received and actions taken.

#### **5.1.16 Cumulative Impact**

Possible cumulative impacts associated with the operational phase include increased traffic and noise in the area.

**Desired Outcome:** To minimise all cumulative impacts associated with the facility.

#### **Actions**

##### **Mitigation:**

- ◆ Addressing each of the individual impacts as discussed and recommended in the EMP would reduce the cumulative impact.
- ◆ Reviewing bi-annual and annual reports for any new or re-occurring impacts or problems would aid in identifying cumulative impacts and help in planning if the existing mitigations are insufficient

##### **Responsible Body:**

- ◆ Proponent

##### **Data Sources and Monitoring:**

- ◆ Annual summary report based on all other impacts must be created to give an overall assessment of the impact of the operational phase.

## 5.2 DECOMMISSIONING AND REHABILITATION

Decommissioning is not foreseen during the validity of the environmental clearance certificate. Decommissioning was however assessed as construction activities include modification and decommissioning. Should decommissioning occur at any stage, rehabilitation of the area may be required. Decommissioning will entail the complete removal of all infrastructure including buildings and underground infrastructure. Any pollution present on the site must be remediated. The impacts associated with this phase include noise and waste production as structures are dismantled. Noise must be kept within Health and Safety Regulations of the Labour Act and WHO standards and waste should be contained and disposed of at an appropriately classified and approved waste facility and not dumped in the surrounding areas. Future land use after decommissioning should be assessed prior to decommissioning and rehabilitation initiated if the land would not be used for future purposes. The Environmental Management Plan for the facility will have to be reviewed at the time of decommissioning to cater for changes made to the site and to implement guidelines and mitigation measures.

## 5.3 ENVIRONMENTAL MANAGEMENT SYSTEM

The Proponent could implement an Environmental Management System (EMS) for their operations. An EMS is an internationally recognized and certified management system that will ensure ongoing incorporation of environmental constraints. At the heart of an EMS is the concept of continual improvement of environmental performance with resulting increases in operational efficiency, financial savings and reduction in environmental, health and safety risks. An effective EMS would need to include the following elements:

- ◆ A stated environmental policy which sets the desired level of environmental performance;
- ◆ An environmental legal register;
- ◆ An institutional structure which sets out the responsibility, authority, lines of communication and resources needed to implement the EMS;
- ◆ Identification of environmental, safety and health training needs;
- ◆ An environmental program(s) stipulating environmental objectives and targets to be met, and work instructions and controls to be applied in order to achieve compliance with the environmental policy; and
- ◆ Periodic (internal and external) audits and reviews of environmental performance and the effectiveness of the EMS.
- ◆ The EMP.

## 6 CONCLUSION

The fuel retail facility will not only have a positive impact on Keetmanshoop, but also on the transport industry as well as business and tourism sector operational in the vicinity. In addition to reliable and convenient fuel the Proponent contributes to employment, skills transfer and training which in turn develops the local workforce. Regular upgrades and refurbishment will ensure the operations remain compliant with legislative requirements, and aid in securing a constant and reliable supply of fuel.

Negative impacts can successfully be mitigated. SANS standards relating to the petroleum industry and prescribed by Namibian law must be followed during all operations of the fuel retail facility. Noise pollution should at all times meet the prescribed. Fire prevention should be adequate, and health and safety regulations should be adhered to in accordance with the regulations pertaining to relevant laws and internationally accepted standards of operation. Any waste produced must be removed from site and disposed of at an appropriate facility or re-used or recycled where possible. Hazardous waste must be disposed of at an approved hazardous waste disposal site. Spill containment infrastructure is key in preventing pollution of the environment and includes drip trays and suitably surfaced areas where fuel is handled.

The EMP should be used as an on-site reference document for the operations of the facility. Parties responsible for transgressing of the EMP should be held responsible for any rehabilitation that may need to be undertaken. The Proponent could use an in-house Health, Safety, Security and Environment

Management System in conjunction with the EMP. All operational personnel must be taught the contents of these documents.

Should the Directorate of Environmental Affairs (DEA) of the MEFT find that the impacts and related mitigation measures, which have been proposed in this report, are acceptable, an environmental clearance certificate may be granted to the Proponent. The environmental clearance certificate issued, based on this document, will render it a legally binding document which should be adhered to.



## **Appendix A: Consultant's Curriculum Vitae**





**ENVIRONMENTAL SCIENTIST****André Faul**

André entered the environmental assessment profession at the beginning of 2013 and since then has worked on more than 240 Environmental Impact Assessments including assessments of the petroleum industry, harbour expansions, irrigation schemes, township establishment and power generation and transmission. André's post graduate studies focussed on zoological and ecological sciences and he holds a M.Sc. in Conservation Ecology and a Ph.D. in Medical Bioscience. His expertise is in ecotoxicological related studies focussing specifically on endocrine disrupting chemicals. His Ph.D. thesis title was The Assessment of Namibian Water Resources for Endocrine Disruptors. Before joining the environmental assessment profession he worked for 12 years in the Environmental Section of the Department of Biological Sciences at the University of Namibia, first as laboratory technician and then as lecturer in biological and ecological sciences.

**CURRICULUM VITAE ANDRÉ FAUL**

Name of Firm	:	Geo Pollution Technologies (Pty) Ltd.
Name of Staff	:	ANDRÉ FAUL
Profession	:	Environmental Scientist
Years' Experience	:	24
Nationality	:	Namibian
Position	:	Environmental Scientist
Specialisation	:	Environmental Toxicology
Languages	:	Afrikaans – speaking, reading, writing – excellent English – speaking, reading, writing – excellent

**EDUCATION AND PROFESSIONAL STATUS:**

B.Sc. Zoology	:	University of Stellenbosch, 1999
B.Sc. (Hons.) Zoology	:	University of Stellenbosch, 2000
M.Sc. (Conservation Ecology)	:	University of Stellenbosch, 2005
Ph.D. (Medical Bioscience)	:	University of the Western Cape, 2018

First Aid Class A	EMTSS, 2017; OSH-Med 2022
Basic Fire Fighting	EMTSS, 2017; OSH-Med 2022

**PROFESSIONAL SOCIETY AFFILIATION:**

Environmental Assessment Professionals of Namibia (Practitioner)

**AREAS OF EXPERTISE:**

Knowledge and expertise in:

- ◆ Water Sampling, Extractions and Analysis
- ◆ Biomonitoring and Bioassays
- ◆ Biodiversity Assessment
- ◆ Toxicology
- ◆ Restoration Ecology

**EMPLOYMENT:**

2013-Date	:	Geo Pollution Technologies – Environmental Scientist
2005-2012	:	Lecturer, University of Namibia
2001-2004	:	Laboratory Technician, University of Namibia

**PUBLICATIONS:**

Publications:	5
Contract Reports	+240
Research Reports & Manuals:	5
Conference Presentations:	1