



# UPDATED ENVIRONMENTAL MANAGEMENT PLAN (EMP)

on the Labour Act, 6 of 1992 as amended by the Labour Act, 11 of 2007  
and Section 58 of the Environmental Management Act, 7 of 2007

**Project No: 2025/079/D**

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### UPDATED EMP



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## STATEMENT PAGE

**National Environmental Health Consultants CC (NEHC CC)** is an Approved Inspection Authority in terms of the Occupational Health and Safety Act (85 of 1993). (Certificate No.: CI 057 0H) SA and A.I.A 24/175 Namibia, **Labour Act, 1992 (Act 6 of 1992)** as amended under the **Labour Act, 2007 (Act 11 of 2007)**. And registered with the Allied Health professions Council of Namibia (HPCNA) as an Environmental Health Practitioner Reg. No.: EPH00901 under the **Allied Health Professions Act, 2004 (Act 7 of 2004)**.

J. Pienaar conducted this updated Environmental Management Plan on behalf of **NEHC CC** and hereby declares that the results/findings given in the report are a true reflection of the conditions encountered during the survey/observations on site.

Where relevant published and validated methods exist, they are always used in preference to novel methods. If a novel method is applied, a summary of validation and reference to the internal Standard Operating Procedure(s) is provided.

Whilst recommendations offered in this report are made in good faith and every effort is made to ensure the professional integrity thereof, the final responsibility lies with the client to ensure the correctness and suitability of these recommendations, prior to implementation thereof. **NEHC CC** or its officers shall in no way be liable for any losses suffered by the client as a result of the implementation of such recommendations.

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17<sup>th</sup> of April 2025  
**EIR REPORT DATE**

<b>Date:</b> 16 <sup>th</sup> of April 2025	<b>Company:</b> Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region	<b>Occupational Hygienist:</b> Johan Cornelissen	<b>Project No:</b> 2025 / 079 / D
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Ministry of Environment,  
Forestry and  
Tourism  
NAMIBIA



Ministry of Labour,  
Industrial Relations and  
Employment Creation  
NAMIBIA

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## EXECUTIVE SUMMARY

**National Environmental Health Consultants CC (NEHC CC)** was commissioned by **Mr. Joël van der Waal** from **Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region** to undertake and perform an updated Environmental Management Plan (EMP) for their existing warehouse and bulk storage facility in Walvis Bay.

The updated EMP is being undertaken in accordance with the requirements of Namibia's Environmental Assessment Policy and the Environmental Management Act, 7 of 2007, and other relevant legislation and regulations pertaining to Environmental Assessments and the protection of the environment in the Republic of Namibia. A host of international policies and standards are also being taken into account.

In order for the Namibian Ministry of Environment, Forestry, and Tourism (MEFT) to make an informed decision as to whether or not the project should receive an Environmental Clearance Certificate (ECC) and be allowed to proceed, it is essential that potentially significant environmental and social impacts (both negative and positive) are investigated and well understood. It is, therefore, necessary to conduct the updated Environmental Management Plan (EMP) process. This led to NEHC CC being appointed by **Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region** to undertake the updated EMP for their warehouse and bulk storage facility in Walvis Bay.

The purpose of the updated EMP Report is to:

- Provide a description of the existing facility, including a sufficient level of detail to inform the Ministry of Environment, Forestry, and Tourism, and
- Describe the local environment within which the existing facilities are situated, to assist further, in identifying issues and concerns.

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## Glossary and Abbreviations

ACRONYM	DESCRIPTION
CC	Close Corporation
CEs	Consulting Engineers
CO	Contraction Phase
CLO:	Community Liaison Officer
DS	Design & Planning Phase
DE	Decommissioning Phase
ECO	Environmental Control Officer
EMP	Environmental Management Plan
EMPr	Environmental Management Programme
MEFT	Ministry of Environment, Forestry, and Tourism
OP	Operational Phase
PM	Project Manager (Developer Representative)
RA	<i>Resident Architect</i>
ELO	<i>The Environmental Liaison Officer</i>
VOC's	Vapours

### Definitions:

**Environment:** Surroundings in which an organization operates, including air, water, fauna, flora, natural resources, humans and their interrelations.

**General waste:** Waste that may be disposed of without prior treatment. May be disposed of at a municipal dumpsite.

**Hazardous waste:** An inorganic or organic element or compound that, because of its toxicological, physical, chemical or persistent properties may exercise detrimental, acute or chronic impacts on human health and the environment. This can be generated from a variety of activities and may take the form of liquid, sludge, gas or solid. Hazardous waste can also be defined as any waste that directly or indirectly represents a threat to human health or to the environment.

**Recyclable Waste:** Hazardous or general waste that has the potential to be recycled.

**Waste:** Any matter gaseous, liquid, and solid, or any combination thereof, designated as an undesirable or superfluous by-product, emission, residue, or remainder of any process or activity.

**Waste Stream:** The cycle of a specific waste from the point of origin up to disposal (cradle to grave concept).

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## 1. INTRODUCTION

The project proponent, **Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region** has appointed National Environmental Health Consultants CC (NEHC CC), as its independent environmental consultant, for the purpose of conducting this updated Environmental Management Plan (EMP) process.

The purpose of an updated EMP is to guide the operational phase of the existing warehouse and bulk storage facility owned and operated by **Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region** in Walvis Bay. This process is conducted in order to eliminate or mitigate the various possible risks to the environment, and its surrounding inhabitants during this phase, and through doing so, it will subsequently ensure that minimal damage will be effected or occur to these areas during the operational phase of the existing warehouse and bulk storage facility, owned and operated by **Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region** in Walvis Bay, which are based on the mitigation measures which had been identified for inclusion in this updated EMP.

The ultimate goal of the EMP is to meet social, economic, and bio-physical objectives to such an extent, that the overall product of the activity will not result in a nett negative impact. The economic benefit of the existing warehouse and bulk storage facility should outweigh the negative environmental impacts addressed during this assessment.

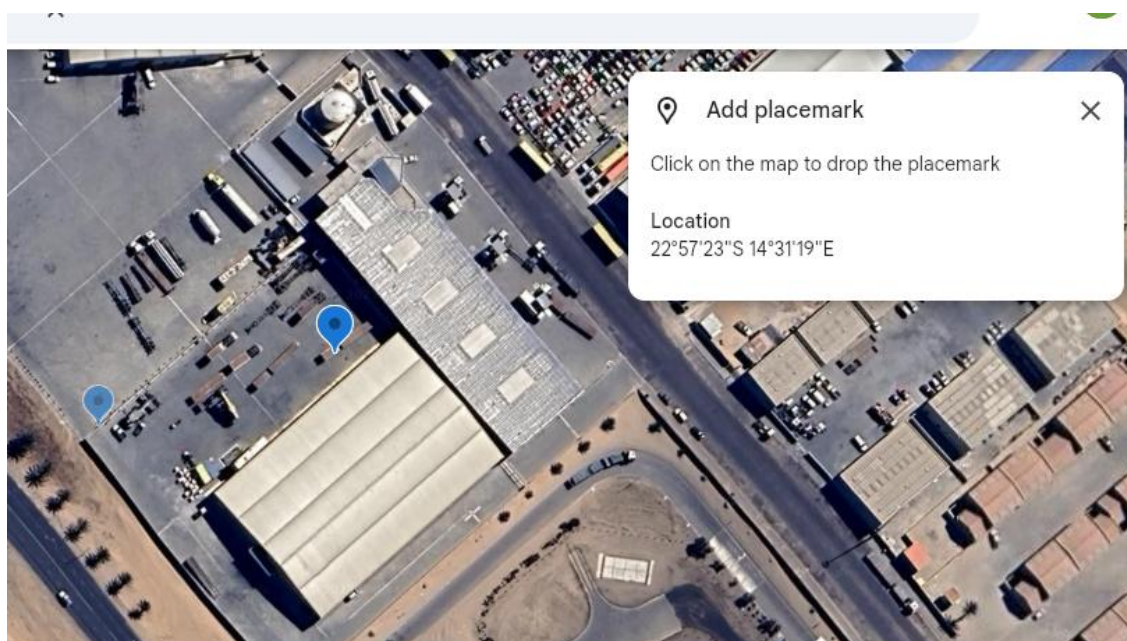
## 2. PURPOSE

The aim of the Updated Environmental Management Plan (EMP) is to detail the actions required to effectively implement the mitigation and management measures. These actions are required to minimize or avoid any negative impacts associated with the activities and operations of **Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region**.

## 3. PROJECT BACKGROUND

### 3.1 Locality

Figure 1: Shows the locality.



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## 3.2 Background

**Reload Logistics**, a well-established and expanding player in the logistics industry in Namibia and the SADC region, boasts a strong presence throughout Africa. With extensive experience and expertise in international freight forwarding and handling, **Reload Logistics Namibia (Pty) Ltd** has earned a reputation for its exceptional capability and capacity. As a multinational logistics and handling service provider, **Reload Logistics Namibia (Pty) Ltd** offers a comprehensive range of services. These include warehousing, customs clearing and consulting, international freight forwarding, transport solutions, and project cargo facilitation.

In terms of infrastructure the **Reload Group** currently operates 17 warehouses across the Southern Africa Region and possesses a fleet of 600 trucks. With a workforce of approximately 1500 employees, the company is equipped to meet the demands of its clientele throughout the region. In line with its commitment to optimizing efficiency and capacity, **Reload Logistics Namibia (Pty) Ltd** aims to enhance its infrastructure, resources, and capabilities in Namibia. Their existing warehouse and bulk storage facility in Walvis Bay (which is the subject of this updated EMP), is at present, the core of their activities and operations in Namibia.

In addition to its core logistics services and in terms of warehousing, the **Reload Group** offers a wide range of value-added services to its clients. These include:

- Storage and handling,
- Certified weighing and sampling,
- Quality control and inspection,
- Reconditioning of damaged commodities,
- Brushing, cleaning, fumigation, and re-bagging,
- Pre-shipment inspection of cargo,
- Pre-shipment inspection of / and cleaning of containers,
- Pre-inspection of storage facilities,
- Transport and distribution,
- Stock Monitoring Services, and
- Monitoring and managing of traded products as collateral for Financial Institutions.

The **Reload Group's** Know-How:

- **Reload Logistics Namibia (Pty) Ltd** work with an integrated strategic approach which oversees delivery networks from A to Z.
- **Reload Logistics'** warehousing and distribution solutions are smart, streamlined, and efficient.
- Thanks to **Reload Logistics'** intimate knowledge of the African market, our clients are supported by our own Customs Brokerage services, which helps by cutting through red tape, saving both time and money in the process.
- The **Reload Group** provides Stock Monitoring Services to banks and financial institutions that offer finance to traders and producers against cargo in storage. The stored commodities may be pledged to the bank and used as collateral. **Reload Logistics** monitors and manages the collateral on behalf of the banks by providing experienced stock monitoring services.
- In addition to providing the Stock Monitoring Services, **Reload Logistics** can carry out independent warehouse surveys to assess the suitability of storage facilities on behalf of clients and financial institutions.
- **Reload Logistics Namibia (Pty) Ltd** also offer commodity trade facilitation for cargo, which is financed by banks or financial institutions.
- **Reloads'** warehouse receipts can be discounted at the counters of most commodity banks and are accepted by major international trading houses.
- **Reloads'** warehouses are managed with the strictest of control and security criteria, adhering to international banks' insurance requirements.

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**Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region**, is situated on Portion 2 of Erf 5739, Rössing Street, Walvis Bay. Their warehouse and bulk storage facility is located in an industrial area of Walvis Bay. Their immediate neighbours are Bachmus Oil and Fuel Supply (Pty) Ltd and the Roads Authority Weighbridge.

**Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region** is situated in an industrial zoned area with similar industrial businesses surrounding it, thus, making the area satisfactory for their warehousing and bulk storage activities and operations. There are no residential areas in close proximity to the warehouse and bulk storage facility owned and operated by **Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region**. It must also be noted that **Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region** is currently in possession of valid Certificates of Registration and Fitness Certificates, issued respectively by the Municipality of Walvis Bay.

This updated Environmental Management Plan (EMP) addresses the management of environmental Impacts related to the existing warehouse and bulk storage facility, owned and operated by **Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region**, situated in Walvis Bay. The documents should be used for managing, mitigating, and monitoring the environmental impacts associated with the decommissioning of the facility, as identified and illustrated in the Environmental Scoping Report conducted at and for the facilities. The Environmental Scoping Report will be valuable as a reference source for understanding this updated EMP, and for placing it into perspective.

#### 4. ENVIRONMENTAL MANAGEMENT PROGRAMME

##### 4.1 Objectives of the EMP

The primary objectives of the updated EMP are as follows:

- To describe action plans for achieving the mitigation measures described in the Environmental Scoping Report, and
- To indicate responsibilities regarding the implementation of these action plans.

**Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region** completed their EMP Report in April 2022 and **Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region's** application for an Environmental Clearance Certificate was approved by MEFT, and their Environmental Clearance Certificate was issued on 21 April 2022.

##### 4.2. Key Characteristics of the report

**Table 1: Shows an overview of the project.**

Element	Description
Proponent	<b>Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region</b> – Mr. Joël van der Waal
Name of the site	<b>Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region</b>
Property Description	<b>Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region</b> – Portion 2 of Erf 5739, Rössing Street, Walvis Bay, Erongo Region.
Site Coordinates	“S 22°57'23” – “E 14°31'19”
Extent of the site	Approximately 3440m <sup>2</sup>
Current capacity of the site	Existing warehouse and bulk storage facility
Baseline environment	<ul style="list-style-type: none"> <li>➤ Limited vegetation on the site,</li> <li>➤ There is no surface water bodies located within a 500m radius of the site, and</li> <li>➤ Area is characterized as not having a shallow water table.</li> </ul>

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### 4.3 Compliance to Regulations

**Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region** will need to comply with the following legislation:

- The Constitution of the Republic of Namibia (1990),
- Namibia's Green Plan,
- Vision 2030: Third National Development Plan of Namibia, 2006/7 – 2011/12,
- Environmental Assessment Policy, 1995,
- Draft Wetland Policy of 2003,
- The National Environmental Health Policy,
- GOVERNMENT GAZETTE OF THE REPUBLIC OF NAMIBIA, Government NOTICES, dated 06 February 2012 number 4878,
- Environmental Management Act, 7 of 2007,
- The Water Resources Management Act, 24 of 2004,
- Labour Act, 6 of 1992: Regulations for the Health and Safety of Employees at Work,
- Labour Act, 11 of 2007,
- Nature Conservation Ordinance, 4 of 1975 (as amended 1996),
- Atmospheric Pollution Prevention Ordinance, 11 of 1976,
- Petroleum Products and Energy Amendment Act, 3 of 2000,
- Soil conservation Act, 76 of 1969,
- Local Authorities Act, 23 of 1992,
- Public and Environmental Health Act, 1 of 2015,
- Road Traffic and Transport Act, 52 of 1999,
- Legislation related to effluent and wastewater disposal Model Drainage Regulations, 1996,
- Road Traffic and Transport Regulations,
- Hazardous Substances Ordinance, 14 of 1974, and amendments,
- Nature Conservation Ordinance Amendment Act, 5 of 1996,
- National Policy on Tourism for Namibia, 2008, and
- National Heritage Act, 27 of 2004.

### 4.4 Responsible Parties

#### 4.4.1 Phases of the Project

The point of departure for any EMP is to take a pro-active approach by addressing and minimizing any potentially significant problem, before it occurs. In particular this updated EMP deals with the current operational phase of the warehouse and bulk storage facility.

#### 4.4.2 Roles and Responsibilities

Various role players have a range of responsibilities to perform during the operational phase, and if any upgrades or construction takes place on or at the existing **Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region** facility.

##### 4.4.2.1 Project Manager (PM) (Developer Representative)

If any upgrades or construction takes place on or at the existing **Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region** facility, the PM will be responsible for the following:

- The PM will be responsible for ensuring that the development, upgrades, and construction is implemented and performed according to the requirements as set out in the EMP.
- The PM should ensure that sufficient resources are available to the other role players to efficiently perform their tasks in terms of, and under the updated EMP.
- The PM must appoint an independent Environmental Control Officer (ECO) to ensure strict adherence to the EMP.

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#### 4.4.2.2 Resident Architect (RA)

If any upgrades or construction takes place on or at the existing **Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region** facility, the RA will be responsible for the following:

- Only architects approved by the PM will be allowed to work on the project and will oversee the individual contracts between the owners of the entire site or portions thereof, and the contractors.

#### 4.4.2.3 Environmental Control Officer (ECO)

If any upgrades or construction takes place on or at the existing **Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region** facility, the ECO will be appointed at the start of the construction, or upgrades, and is mandated to do the following:

- Ensure that all contractors/subcontractors/employees are fully aware of their environmental responsibilities. This will take the form of an initial environmental awareness-training program, in which the requirements of this document will be explained.
- Any damage to the environment must be repaired as soon as possible after consultation between the ECO, the Consulting Engineer, and the relevant contractors.
- The ECO shall monitor their actions to ensure that the developer and/or contractor are adhering to all the stipulations of the EMP.
- The ECO shall be responsible for monitoring the construction activities throughout the project by means of site visits and meetings. This should be documented as part of the site meeting minutes.
- The ECO must sign off and the PM must certify that all clean-up and rehabilitation, or any remedial action required, is completed prior to the transfer of properties.
- A post-construction environmental audit is to be conducted to ensure that all conditions in the EMP have been adhered to.

#### 4.4.2.4 Auditing / Inspections

If any upgrades or construction takes place on or at the existing **Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region** facility:

- The appointed ECO on a regular basis should inspect the site where necessary.
- The PM or the contractor's representative will accompany the ECO on, on-site inspections.
- The contractor will use the formats presented in this updated EMP to report to the PM in terms of compliance to and with this document.
- When, in the opinion of the ECO, a construction activity will result in environmental damage, the ECO will issue instructions to the contractor or PM, who will in turn order the contractor, to halt the activity. Spot fines or penalties may be levied for non-compliance.

#### 4.4.2.5 Method Statements

If any upgrades or construction takes place on or at the existing **Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region** facility, construction method statements from the contractor will be required for specific activities in sensitive environments on request of the Authorities, or the ECO. All method statements will form part of the EMP documentation and are subject to all terms and conditions contained within the EMP document. For each instance wherein it is requested that the contractor submit a method statement to the satisfaction of ECO, the format should clearly indicate the following:

- What - a brief description of the work to be undertaken,
- How - a detailed description of the process of work, methods, and materials,
- Where - a description / sketch map of the locality of work, and

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- When - the sequencing (phases) of actions with a commencement date and a completion date estimation.

The contractor must submit the method statement before any particular construction activity, or any upgrade is due to start. Work may not commence until the method statement has been approved by the ECO.

#### 4.4.2.6 Record Keeping

All records related to the implementation of this management plan must be kept together in an office where it is safe. Records should be kept for two (2) years and at any time are available for scrutiny by any relevant Authority.

#### 4.4.2.7 Resident Engineer (RE)

If any upgrades or construction take place on or at the existing **Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region** facility, a RE acts as a direct, on-site resource for all technical aspects related to the development. He/she is available on the construction site at all times, overseeing all phases of the construction activities. He/she will liaise with the ECO where required to ensure EMP implementation.

#### 4.4.2.8 Consulting Engineers (CEs)

If any upgrades or construction take place on or at the existing **Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region** facility, these engineers are involved during the planning, design, and construction period. They are not available on site at all times but are part of the specialist team during the final design and construction stages, to advise on appropriate environmental management and mitigation.

#### 4.4.3 **Standards**

If any upgrades or construction take place on or at the existing **Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region** facility:

- The ECO will keep written and photographic records of the site, and its surroundings before, after, and during construction on the site.
- The contractor will keep records of construction activities, instructions received from the ECO and PM concerning environmental matters.
- The ECO will keep records of cases of non-compliance and remedial actions taken.
- Where no quantitative standards are applicable, visual standards will apply.
- The contractor will rehabilitate the site to a condition acceptable to the ECO and respond timeously to any complaints and instructions regarding construction activities.

#### 4.4.4 **EMP Objectives**

This EMP must be used during the current operational phase of the existing **Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region** facility. The objectives of this plan are to:

- Ensure all environmental safeguards are carried out correctly.
- Manage site activities effectively and coordinate with other stakeholders in the project.
- Minimize adverse impacts on the environment.
- Ensure that environmental mitigation measures are in place from the start of the project.
- Minimize disruption to fauna and flora and neighbouring landowners / communities.
- Monitor the project.

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#### 4.4.5 EMP Context

The EMP originally formed part of the overall planning process and phase of the project, which should be implemented by the Developer, upon approval thereof by the appropriate authorities. However, the updated EMP provides for environmental mitigation measures during the current operational phase of the project and should continuously be implemented throughout the duration of the project. A copy of the EMP must be available on site at all times.

There are at least 2 role players participating in the environmental management of the site, namely:

- **Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region, and**
- **The Service Providers utilized by Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region.**

This updated EMP must be attached as an Appendix to service provider tender documents and must be referred to in the tender documents as *special conditions of the tender*.

Ultimate responsibility for implementation of the updated EMP lies with **Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region**. This responsibility, in some instances may be delegated to contractors in the employ and service of **Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region** for practical purposes, but **Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region** will retain legal accountability. In that capacity, **Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region** should delegate suitably qualified persons with the responsibility to ensure the implementation of the updated EMP, and who will:

- Know the contents and implications of the Environmental Scoping Report and monitor the implementations of the Environmental Scoping Report findings using the EMP.
- Guide, advise, and consult the contractors on environmental issues during the decommissioning of the respective warehouse and bulk storage facility.
- Revise and update the updated EMP as required and inform relevant parties of the changes.
- Protect the environment.

Service Providers and Contractors will be saddled with the following responsibilities during the decommissioning of the warehouse and bulk storage facility.

- Ensure that all requirements of the updated EMP are communicated to, understood, and followed by all persons working on the project who may have an impact on the environment.
- Ensure that a procedure exists for reporting incidents and resolving any problems rapidly.
- Keep good records relating to the compliance/non-compliance with the conditions of the authorization.
- These records must be made available to the relevant authority within seven (7) days of a written request.

## 5. PHASES OF THE PROJECT

The aim of this updated Environmental Management Programme (EMPr) is to derive mitigation measures that should be made binding when additional contracting activities result in the appointment of contractors on site, as well as measures that should be implemented during the current operational phase.

The purpose of the updated EMPr is to provide solutions to problems before they occur. If adhered to, this updated EMPr should limit corrective measures required during the current operational phase of the existing **Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region** facility.

***The updated EMPr deals with the following phases as detailed below:***

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### 5.1 The Planning Phase

Considering that this updated EMP pertains to the existing warehouse and bulks storage facility owned and operated by **Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region**, there will be no planning phase.

### 5.2 The Pre-Construction Phase

As this is an existing warehouse and bulk storage facility, owned and operated by **Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region**, there will be no Pre-Construction Phase.

### 5.3 The Construction Phase

As this is an existing warehouse and bulk storage facility, there will be not construction phase. However, should any construction or upgrades take place at or on the existing warehouse and bulk storage facility of **Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region**, the majority of the impacts of such construction and upgrades, will have a direct and immediate effect. Thus, continual monitoring of the site during the construction phase will help and aid in the identification of impacts as, and when they occur.

### 5.4. The Operational Phase

As elucidated hereinabove, this updated EMP pertains to the existing warehouse and bulk storage facility of **Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region**. As such, this updated EMP will mainly refer to and focus on the current operational phase. Potential environmental impacts arising during the current operational phase can be minimized through the implementation of, and the abidance to the updated EMP.

## 6. ANTICIPATED ENVIRONMENTAL IMPACTS

The anticipated adverse impacts requiring mitigation relating to the biophysical and socio-economic environment for the current operational phase of the existing warehouse and bulk storage facility of **Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region**, are listed below:

#### Operational Phase - Adverse Impacts:

- Noise pollution and intrusion,
- Visual intrusion and light pollution,
- Traffic,
- Atmospheric pollution and odours,
- Safety and security,
- Soil and groundwater contamination (surface spillage of fuel),
- Risks of fires and explosions, and
- Waste generation and disposal.

## 7. RESPONSIBILITIES

The Environmental Management Programme (EMPr) specifies the responsibilities of the role players.

**Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region** remains ultimately responsible for ensuring that the facility is implemented according to the requirements of the EMPr throughout all phases of the project. This includes the current operational phase and if any upgrades or construction take place on or at the existing **Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region** warehouse and bulk storage facility.

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- **The Environmental Control Officer (ECO):** the ECO is appointed by the developer as an independent monitor of the implementation of the EMPr i.e. independent of the developer and contractor. The ECO is responsible for providing feedback on potential environmental problems associated with the development. The ECO has the right to enter the site and do monitoring and auditing at any time, subject to compliance with health and safety requirements applicable to the site (e.g. wearing of protective head gear and safety boots). The ECO will be responsible for a minimum of monthly site audits, followed by an environmental control report, that will detail the status of environmental compliance, and highlight mitigation. The ECO will be responsible for liaising with authorities, MEFT. The ECO must submit monthly environmental audit reports to the authorities. The ECO must indicate the necessary corrective action measures to eliminate the cause of the non-conformances. The ECO is also responsible for liaising with contractors, informing them of any decisions that are taken concerning environmental management during the construction phase. This would also include informing the contractors of the necessary corrective actions to be taken.
- **Site Agent:** is usually a site engineer or project manager who is the developer's most senior representative on site and coordinates activities on site. The site agent must follow the advice of the ECO with regards to environmental management and ensure that the contractor abides by all requirements stipulated by the ECO.
- **Contractor:** the contractor as the developer's agent on site, is bound by the Clearance Certificate and EMPr conditions through his/her contract with the developer and is responsible for ensuring that conditions of the EMPr are strictly adhered to at all times. The contractor must comply with all orders (whether verbal or written) given by the ECO, project manager or site agent in terms of the EMPr.
- **The Environmental Liaison Officer (ELO):** The Contractor shall submit to the Site Agent a nominated representative of the Contractor as an ELO to assist with day-to-day monitoring of the construction activities for the contract. Issues raised by the ECO will be routed to the ELO for the contractor's attention. The ELO shall be permanently on site during the construction phase to ensure daily environmental compliance with the EMPr. The ELO should preferably be a senior and respected member of the construction crew, as past experience has revealed that ELO's that can relate to the workforce are most effective for information transfer and ensuring compliance with the EMPr. The ELO will report directly to the ECO regarding environmental compliance. The site audits undertaken by the ECO will be undertaken alongside the ELO. The ECO will point out areas of concern, and the ELO will be responsible for ensuring day to day compliance with the EMPr. Should any emergencies arise the ELO will alert the ECO who will take action. There shall be an approved ELO on site at all times. Before the Contractor commences with each Construction Activity, the ELO shall give to the site agent a written statement setting out the following:
  - The type of construction activity.
  - Locality where the activity will take place.
  - Identification of impacts that might result from the activity.
  - Identification of activities or aspects that may cause an impact.
  - Methodology for impact prevention for each activity or aspect.
  - Emergency/disaster incident and reaction procedures (need to be demonstrated).
  - Treatment and continued maintenance of impacted environment.
  - **Community Liaison Officer (CLO):** the contractor must appoint a CLO to act as a point of contact between the contracting team and the community that will be affected by the construction activities. Complaints from the community about construction activities must be channelled through the CLO. The CLO's responsibility is to liaise with the Interested and Affected Parties.

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## 8. IDENTIFICATION OF ENVIRONMENTAL ASPECTS AND IMPACTS

**Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region** activities have the potential to impact the biophysical and socio-economic environment. Environmental aspects and potential impacts were identified during the screening and scoping phases, in consultation with authorities, Interested and Affected Parties and the environmental specialists.

The relevance of the potential impacts (“screening”) are also presented in the tables below to determine if certain aspects need to be assessed in further detail. The potential impacts can also be assessed as part of this process.

The tables below provide a summary of the environmental aspects and impacts associated with the warehouse and bulk storage facility of **Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region**.

The following tables form the core of this EMPr for the current operational phase of the project. These tables should be used as a checklist on site. The aim of this EMPr is to derive measures that should be implemented during the current operational phase.

The purpose of the EMPr is to provide solutions to problems before they occur. If adhered to, this EMPr should limit corrective measures required during the current operational phase of the existing warehouse and bulk storage facility of **Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region**.

**Table 2: OPERATIONAL PHASE - Legal Compliance**

Statutory Requirement: Legal Compliance	
<b>PHASE:</b>	<b>Operational</b>
<b>IMPACT:</b>	<b>Compliance</b>
<b>TASK/ENVIRONMENTAL IMPACT:</b>	<b>Legal Compliance</b>
<b>OBJECTIVE:</b>	To comply with all the legal requirements for operations in Namibia.
<b>ACTION REQUIRED:</b>	➤ Ensure that the necessary permits from ministries and local authorities are available.
<b>TARGETS TO MONITOR COMPLIANCE AND REPORTING THERE ON:</b>	All permits, certificates and relevant documents on file. All record must be kept.
<b>RESPONSIBILITY:</b>	Owner and Administration Manager & Environmental Compliance Officer.
<b>TIME FRAME:</b>	Current operational phase.

**Table 3: OPERATIONAL PHASE - Environmental Clearance Certificate**

Statutory Requirement: Legal Compliance	
<b>PHASE:</b>	<b>Operational</b>
<b>IMPACT:</b>	<b>Compliance</b>
<b>TASK/ENVIRONMENTAL IMPACT:</b>	Environmental Clearance Certificate must be renewed every three years.
<b>OBJECTIVE:</b>	To maintain Environmental Clearance Certificate.
<b>ACTION REQUIRED:</b>	➤ Six monthly Environmental Inspection and report for three yearly renewal of Environmental Clearance Certificate.
<b>TARGETS TO MONITOR COMPLIANCE AND REPORTING THERE ON:</b>	Valid Environmental Clearance Certificate on file.
<b>RESPONSIBILITY:</b>	Owner, Operational Manager and ECO
<b>TIME FRAME:</b>	Current operational phase and if any upgrades or construction take place on or at the existing facility.

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Table 4: OPERATIONAL PHASE - Socio-economic

Socio-economic: Job Opportunities and Economic Upliftment	
PHASE:	Operational
IMPACT:	BENEFICIAL
TASK/ENVIRONMENTAL IMPACT:	Promotion of economic development through skills development.
OBJECTIVE:	Advantages for local previously disadvantaged communities in terms of employment, empowerment and socio-economic upliftment.
ACTION REQUIRED:	<ul style="list-style-type: none"> <li>➤ Local labour (male and female, skilled and unskilled) should be employed as a priority.</li> <li>➤ Where possible, employment of local persons should be used for capacity building which will sustain economic development through training.</li> </ul>
TARGETS TO MONITOR COMPLIANCE AND REPORTING THERE ON:	Record of local employees employed. A yearly report on skills development and training should be compiled.
RESPONSIBILITY:	General Manager.
TIME FRAME:	Current operational phase.

Table 5: OPERATIONAL PHASE - Socio-economic

Socio-economic: Job Opportunities and Economic Upliftment	
PHASE:	Operational
IMPACT:	BENEFICIAL
TASK/ENVIRONMENTAL IMPACT:	Job Opportunities and Economic Upliftment.
OBJECTIVE:	Advantages for local previously disadvantaged communities in terms of employment, empowerment and socio-economic upliftment.
ACTION REQUIRED:	<ul style="list-style-type: none"> <li>➤ Indirectly, jobs are also created in industries that provide goods, materials and services.</li> <li>➤ The existing warehouse and bulk storage facility will increase skills development and also local employment in the area.</li> <li>➤ The development will lead to the increase in the number of convenience facilities in the primary market area.</li> </ul>
TARGETS TO MONITOR COMPLIANCE AND REPORTING THERE ON:	Record of local employees employed.
RESPONSIBILITY:	Owner
TIME FRAME:	Current operational phase

Table 6: OPERATIONAL PHASE - Socio-economic

Socio-economic: Contribute to upgrading of existing infrastructure	
PHASE:	Operational
IMPACT:	BENEFICIAL
TASK/ENVIRONMENTAL IMPACT:	Contribute to upgrading of existing infrastructure.
OBJECTIVE:	Improved municipal services.
ACTION REQUIRED:	<ul style="list-style-type: none"> <li>➤ All recommendations made by the civil, traffic and electrical engineer and approved by the Municipality must be installed as per standard specifications.</li> </ul>
TARGETS TO MONITOR COMPLIANCE AND REPORTING THERE ON:	Implementation of infrastructure as per approved engineering plans.
RESPONSIBILITY:	Owner, Operational Manager and ECO
TIME FRAME:	Current operational phase and if any upgrades or construction takes place on or at the existing facility.

Table 7: OPERATIONAL PHASE - Security and Surveillance

Security and Surveillance: Control of access.	
PHASE:	Operational.
IMPACT:	Security and Surveillance.
TASK/ENVIRONMENTAL IMPACT:	The control of access points (Gates and Doors) to <b>Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region</b> to prevent unauthorized entry potentially causing injury to untrained people or theft or destruction of company property.
OBJECTIVE:	Control of access points (Gates and Doors) to <b>Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region.</b>
ACTION REQUIRED:	<ul style="list-style-type: none"> <li>➤ Staff training to ensure that no unauthorized entry will be permitted and persons wishing to enter the premises legitimately are escorted by a member of staff for their own safety and well-being.</li> <li>➤ Security procedures and measures to be reviewed yearly and any amendments to be communicated to management and employees.</li> </ul>
TARGETS TO MONITOR COMPLIANCE AND REPORTING THERE ON:	Video surveillance records to be downloaded and stored for security related incidents together with reports detailing the events.
RESPONSIBILITY:	Owner and Administration Manager and Environmental Compliance Officer.
TIME FRAME:	Current operational phase.

Table 8: OPERATIONAL PHASE – Legal Compliance: Visual Intrusion and Light Pollution

Socio- economic: Visual Intrusion and Light Pollution	
PHASE:	Operational
IMPACT:	ADVERSE
TASK/ENVIRONMENTAL IMPACT:	Visual Intrusion and Light Pollution.
OBJECTIVE:	To mitigate the potential negative impact on "genius loci" and visual impact.
ACTION REQUIRED:	<ul style="list-style-type: none"> <li>➤ Light pollution should be minimized.</li> <li>➤ Lighting on site is to be sufficient for safety and security purposes but shall not disturb the surrounding neighbours or interfere with road traffic.</li> <li>➤ Littering, rubbish and illegal dumping on the site is NOT allowed.</li> <li>➤ Refuse must be contained and disposed of at the Municipal land fill site.</li> <li>➤ Refuse bins must be provided. These must be sufficient in number and easily accessible.</li> <li>➤ The buildings may not be visually intrusive.</li> <li>➤ The buildings must be regularly painted.</li> <li>➤ All lights used for non-security purposes should be energy efficient for example compact fluorescent lights (CFL). Fluorescent lamps give five times the light and last up to 10 times as long as ordinary bulbs.</li> <li>➤ Outside lights will have to be downward shining (eyelid type), low wattage and should not be positioned higher than 1 m above the ground surface.</li> </ul>
TARGETS TO MONITOR COMPLIANCE AND REPORTING THERE ON:	No complaints from surrounding property owners.
RESPONSIBILITY:	Owner, Operational Manager and ECO.
TIME FRAME:	Planning and current operational phases.

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Table 9: OPERATIONAL PHASE – Legal Compliance: Traffic

Socio- economic: Traffic	
PHASE:	Operational
IMPACT:	ADVERSE
TASK/ENVIRONMENTAL IMPACT:	Traffic control.
OBJECTIVE:	Possible increased pedestrian hazard and increased road damage.
ACTION REQUIRED:	<ul style="list-style-type: none"> <li>➤ Signs must conform to the standards of Manual for Outdoor Advertising Control.</li> <li>➤ Areas that have been landscaped must be maintained.</li> <li>➤ Access to the site is from Rössing Street Access to the site is a problem due to large volumes of trucks within the street, which impede access to and from the existing facility.</li> <li>➤ Road surfaces in the immediate vicinity of the site should be monitored. If the road is damaged the relevant authority must be notified</li> <li>➤ Access to and from the site must not have a negatively impact on the traffic.</li> <li>➤ All requirements by the Traffic engineer and Provincial and Local Traffic Department must be adhered to.</li> </ul>
TARGETS TO MONITOR COMPLIANCE AND REPORTING THERE ON:	No complaints from road users.
RESPONSIBILITY:	Owner, Operational Manager, Safety Officer and ECO.
TIME FRAME:	Planning, design and current operational phases.

Table 10: OPERATIONAL PHASE – Legal Compliance: Noise

Socio- economic: Noise	
PHASE:	Operational
IMPACT:	ADVERSE
TASK/ENVIRONMENTAL IMPACT:	<p>Noise:</p> <p>Excessive noise in the workplace presents a risk of hearing damage and other health problems.</p> <p>The parts of the ear that process high frequency sounds are usually the First to be affected. The degree of hearing loss depends on the loudness of the noise and how long exposure is.</p> <p>Typical noise sources are Power tool operation and Hand tools (use of hammers on metallic surfaces).</p>
OBJECTIVE:	To minimize impact of noise on surrounding properties and environment.
ACTION REQUIRED:	<ul style="list-style-type: none"> <li>➤ Noise levels shall be kept within acceptable limits, and forecourt staff must abide by National Noise Laws and local by-laws regarding noise.</li> <li>➤ Equipment such as mechanical equipment, extraction fans, refrigerators that are fitted with noise reduction facilities (e.g. side flaps, silencers etc.) must be used as per operating instructions and maintained properly.</li> <li>➤ Noise levels should comply with the SANS Code of Practice 10083-2013 (recommended noise levels). SANS 10083:2012 – The Measurement and Assessment of Occupational Noise for Hearing Conservation Purposes.</li> <li>➤ Employees operating Power tools and Hand tools like hammers that generate excessive noise should comply with Health and Safety standards that require them to wear ear protection.</li> <li>➤ <b>Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region</b> must ensure that PPE is provided and training given how and when it should be worn.</li> </ul>
TARGETS TO MONITOR COMPLIANCE AND REPORTING THERE ON:	<p>No complaints from surrounding neighbours.</p> <p>A complaints register should be kept logging any complaints by the public and the complaints should be investigated and action taken, if deemed necessary.</p>
RESPONSIBILITY:	Owner, Operational Manager, Safety Officer and ECO.
TIME FRAME:	Current operational phases and if any upgrades or construction take place on or at the existing facility.

Table 11: OPERATIONAL PHASE – Legal Compliance: Dust

Socio- economic: Dust	
PHASE:	Operational
IMPACT:	ADVERSE
TASK/ENVIRONMENTAL IMPACT:	Dust: Walvis Bay has seasonal winds which can cause excessive dust that can pose hazards to the public and industrial operations.
OBJECTIVE:	To minimize impact of dust on surrounding properties and environment.
ACTION REQUIRED:	<ul style="list-style-type: none"> <li>➤ Operations involving handling and transport of product must be avoided under high wind conditions or when a visible dust plume is present.</li> <li>➤ Staff working outside should be issued dust masks and goggles that will mitigate the effects.</li> </ul>
TARGETS TO MONITOR COMPLIANCE AND REPORTING THERE ON:	No complaints from surrounding property residents. A complaints register should be kept logging any complaints by the public and the complaints should be investigated and action taken, if deemed necessary.
RESPONSIBILITY:	Owner, Operational Manager, Safety Officer and ECO.
TIME FRAME:	Current operational phases and if any upgrades or construction takes place on or at the existing facility.

Table 12: OPERATIONAL PHASE – Legal Compliance: Atmospheric Pollution and Odours

Socio- economic: Atmospheric Pollution and Odours	
PHASE:	Operational
IMPACT:	ADVERSE
TASK/ENVIRONMENTAL IMPACT:	Atmospheric Pollution and Odours.
OBJECTIVE:	Minimize atmospheric pollution and odours.
ACTION REQUIRED:	<ul style="list-style-type: none"> <li>➤ The emissions from the existing warehouse and bulk storage facility of <b>Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region</b> may have additional health risks.</li> <li>➤ Emissions from the <b>Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region</b> facility will be low level and thus, disperse into the atmosphere.</li> <li>➤ The emissions from the existing <b>Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region</b> facility would be dispersed according to the prevailing wind direction, with increased distance the concentration of the emitted particles will decrease.</li> <li>➤ All general waste areas are to be maintained in a neat and orderly manner and bins must have secure lids.</li> <li>➤ The existing <b>Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region</b> facility must fully comply with the No. 5430 Government Gazette 27 March 2014 and No. 35 Regulations under the Tobacco Products Control Act, 2010</li> </ul>
TARGETS TO MONITOR COMPLIANCE AND REPORTING THERE ON:	No reports of negative health incidents or complaints from surrounding neighbours.
RESPONSIBILITY:	Owner, Operational Manager, Safety Officer and ECO.
TIME FRAME:	Current operational phase and if any upgrades or construction takes place on or at the existing facility.

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**Table 13: OPERATIONAL PHASE – Legal Compliance: Safety and Security.**

<b>Socio- economic: Safety and Security</b>	
<b>PHASE:</b>	<b>Operational</b>
<b>IMPACT:</b>	<b>ADVERSE</b>
<b>TASK/ENVIRONMENTAL IMPACT:</b>	The control of access points (Gates and Doors) to the facility of <b>Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region</b> to prevent unauthorized entry, potentially causing injury to untrained people or theft or destruction of company property.
<b>OBJECTIVE:</b>	Ensure safety and security of staff and users of the facility.
<b>ACTION REQUIRED:</b>	<ul style="list-style-type: none"> <li>➤ Appropriate measures should be in place for the correct storage and handling of material as well as the procedures for dealing with dangerous situations.</li> <li>➤ Staff should be adequately trained with respect to dealing with crime.</li> <li>➤ Equipment and materials must be handled by staff that have been supervised and adequately trained.</li> <li>➤ Staff must be regularly updated about the safety procedures.</li> <li>➤ Emergency facilities must be available and adequately supplied for use by staff and customers.</li> <li>➤ Emergency contact details for the police, Security Company and fire department must be readily available.</li> <li>➤ Staff training to ensure that no unauthorized entry will be permitted and persons wishing to enter the premises legitimately are escorted by a member of staff for their own safety and well-being.</li> <li>➤ Security procedures and measures to be reviewed yearly and any amendments to be communicated to management and employees.</li> </ul>
<b>TARGETS TO MONITOR COMPLIANCE AND REPORTING THERE ON:</b>	Video and camera surveillance records to be downloaded and stored for security related incidents together with reports detailing the events.
<b>RESPONSIBILITY:</b>	Operational Manager and Safety Officer.
<b>TIME FRAME:</b>	Current operational phase and if any upgrades or construction takes place on or at the existing facility.

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**Table 14: OPERATIONAL PHASE – Legal Compliance: Health and Safety**

<b>Legal Compliance: Health and Safety</b>	
<b>PHASE:</b>	<b>Operational</b>
<b>IMPACT:</b>	<b>ADVERSE</b>
<b>TASK/ENVIRONMENTAL IMPACT:</b>	Legal Compliance - Health and Safety.
<b>OBJECTIVE:</b>	<p>The day-to-day activities and operations of the warehouse and bulk storage facility of <b>Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region</b> pose various health and safety risks to employees:</p> <ul style="list-style-type: none"> <li>➤ Operation of forklifts and trucks,</li> <li>➤ Employees not wearing adequate PPE,</li> <li>➤ Manual handling,</li> <li>➤ Lifting and Hoisting,</li> <li>➤ Trips and falls,</li> <li>➤ Chemical Exposure,</li> <li>➤ Accidental cross-contamination,</li> <li>➤ Dust,</li> <li>➤ Noise, and</li> <li>➤ Other Occupational Hygiene Stressors.</li> </ul>
<b>ACTION REQUIRED:</b>	<ul style="list-style-type: none"> <li>➤ <b>Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region</b> must ensure that employees are aware of the risks to health and safety to their well-being on site and <b>Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region</b> must comply with the health and safety standards stated in the Labour Act.</li> <li>➤ The health and safety management system mitigation measure are: <ul style="list-style-type: none"> <li>• Vehicle and forklift operators must have the relevant licenses to operate such equipment with site specific training as well as pre- inspection checklists before operation of vehicles or forklifts.</li> <li>• Personal Protective Equipment is available, and employees are trained in their proper use.</li> <li>• Training in proper lifting techniques to prevent manual handling injuries.</li> <li>• Good Housekeeping standards and procedures.</li> <li>• Training to mitigate trip and fall hazards</li> <li>• Ensure danger, warning, caution, notice and safety signs are on site where relevant.</li> <li>• First Aid kits are available on site.</li> </ul> </li> </ul>
<b>TARGETS TO MONITOR COMPLIANCE AND REPORTING THERE ON:</b>	<p><b>Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region</b> must ensure Employees are identified and trained in First Aid and that emergency contact details are accessible and displayed on signage on every site. First Aid Kits to be made available on site.</p> <p>A register of incidents must be kept, and should an incident occur, then actions are taken to mitigate or eradicate these incidents from occurring.</p>
<b>RESPONSIBILITY:</b>	Operational Manager and Safety Officer.
<b>TIME FRAME:</b>	Current operational phase and if any upgrades or construction takes place on or at the existing facility.

**Table 15: OPERATIONAL PHASE – Bio-Physical: Risks of Fires and Explosions**

<b>Bio-Physical: Risks of Fires and Explosions</b>	
<b>PHASE:</b>	<b>Operational</b>
<b>IMPACT:</b>	<b>ADVERSE</b>
<b>TASK/ENVIRONMENTAL IMPACT:</b>	Risks of Fires and Explosions.
<b>OBJECTIVE:</b>	Prevent emergency incidents.
<b>ACTION REQUIRED:</b>	<p>The design of the existing <b>Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region</b> facility must conform to the following fire safety standards and legislation:</p> <ul style="list-style-type: none"> <li>➤ Labour Act, 11 of 2007.</li> <li>➤ Local Authorities Fire Brigade Services Act, 5 of 2006.</li> </ul> <p>The following signs must be installed in accordance with the Fire Department:  <b>"NO SMOKING"</b>  <b>"NO NAKED FLAME"</b></p> <ul style="list-style-type: none"> <li>➤ Firefighting facilities must conform to the oil industry standard and be regularly inspected.</li> <li>➤ The existing <b>Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region</b> facility management must develop an EMERGENCY PLAN. All staff must be adequately trained in the implementation of this plan.</li> </ul>
<b>TARGETS TO MONITOR COMPLIANCE AND REPORTING THERE ON:</b>	<ul style="list-style-type: none"> <li>➤ Approved Emergency Response Plan.</li> <li>➤ Record of regular training of staff.</li> <li>➤ Record of regular monitoring.</li> </ul>
<b>RESPONSIBILITY:</b>	Owner, Operational Manager, Safety Officer and ECO
<b>TIME FRAME:</b>	Current operational phase and if any upgrades or construction takes place on or at the existing facility.

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**Table 16: OPERATIONAL PHASE – Bio-Physical: Risks of Fires and Explosions – Continue**

<b>Bio-Physical: Risks of Fires and Explosions</b>	
<b>PHASE:</b>	<b>Operational</b>
<b>IMPACT:</b>	<b>ADVERSE</b>
<b>TASK/ENVIRONMENTAL IMPACT:</b>	<p>Fire and explosive hazards include compressed gas, combustible and flammable liquids and substances, and/or when hot work is performed.</p> <p>Fire and explosion can occur when the temperature has reached the flash point of the volatile material, and where there is sufficient vapour present in the atmosphere.</p> <p>Storage of these items present an inherent fire risk and operating procedures and safety measures should be in place to mitigate this hazard during operation and storage as human error mainly contributes to these hazards causing a fire and or explosion.</p>
<b>OBJECTIVE:</b>	Prevent emergency incidents.
<b>ACTION REQUIRED:</b>	<p>To ensure the prevention or mitigation of these hazards the employer must:</p> <ul style="list-style-type: none"> <li>➤ Develop safe work procedures for fire and explosive hazards in the workplace, including storage, handling and operation of these items according to MSDS instructions and guidelines.</li> <li>➤ Regular site inspections to identify potential hazards.</li> <li>➤ Good maintenance and electrical components to prevent oil spillages or sparks that could lead to a fire hazard.</li> <li>➤ Good housekeeping practices to prevent accumulation of flammable material such as plastics, oily rags and wood.</li> <li>➤ Training of employees in the safe work procedures.</li> <li>➤ Employees are trained in identifying fire and explosive hazards and are encouraged to report unsafe conditions so action can be taken immediately.</li> <li>➤ Ensure that employees comply with the safe work procedures.</li> <li>➤ Sufficient fire protection equipment and fire extinguishers are present in the workplace.</li> <li>➤ Regular inspection of Water Supply points and Fire Fighting Equipment.</li> <li>➤ Fire Evacuation Drills to be done yearly to ensure familiarity with access routes and muster points.</li> </ul>
<b>TARGETS TO MONITOR COMPLIANCE AND REPORTING THERE ON:</b>	<ul style="list-style-type: none"> <li>➤ Reporting should be recorded of all incidents.</li> <li>➤ Also, to be recorded are the dates when Fire Drills are practiced and when fire equipment was inspected and if need be, replaced and water supply points tested.</li> </ul>
<b>RESPONSIBILITY:</b>	Operational Manager and Safety Officer.
<b>TIME FRAME:</b>	Current operational phase and if any upgrades or construction takes place on or at the existing facility.

Table 17: OPERATIONAL PHASE – Bio-Physical: Waste Generation and Disposal

Bio-Physical: Waste Generation and Disposal	
PHASE:	Operational
IMPACT:	ADVERSE
TASK/ENVIRONMENTAL IMPACT:	Waste is created during operations and includes waste created from offices, industrial operations, and waste bins. These wastes are to be collected and stored to be taken to an allocated waste disposal facility.
OBJECTIVE:	Prevent pollution of ground and surface water and the environment as a whole.
ACTION REQUIRED:	<ul style="list-style-type: none"> <li>➤ Waste collection and cleaning must be done on a regular basis to prevent hazards associated with pest control and fire. Waste that can be recycled must be separated to be taken to the appropriate recycling facility.</li> <li>➤ <b>Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region</b> has identified waste collection points on site and placed suitable receptacles for waste collection.</li> <li>➤ Recycling and the provision of separate waste receptacles for different types of waste must be encouraged.</li> <li>➤ Waste that has been identified as hazardous (contaminated soils, hydrocarbon-soaked rags, filters etc.) should be separated and taken to a waste disposal facility to be disposed of appropriately.</li> <li>➤ Training of personnel to identify waste that is Hazardous, non-hazardous and what is recyclable.</li> <li>➤ Solid waste generated needs to be collected at a central point.</li> <li>➤ This waste will be disposed of as normal domestic waste at the closest municipal waste disposal site.</li> <li>➤ Waste management at the existing <b>Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region</b> facility shall be strictly controlled and monitored. Only approved waste disposal methods shall be allowed.</li> <li>➤ NO burning, on-site burying or dumping of waste shall occur on site.</li> <li>➤ Hazardous waste will only be produced during emergency situations such as a spill that has been cleaned up with an absorbent material. This will be disposed of at a registered hazardous landfill site.</li> <li>➤ These materials may be removed by an appropriate hazardous waste Contractor. Proof of appropriate disposal must be obtained by the Contractor.</li> </ul>
TARGETS TO MONITOR COMPLIANCE AND REPORTING THERE ON:	Any hazardous waste that is disposed of must be recorded in a register, making record of the type of hazardous waste, the weight and the waste disposal facility that received it. Proof of receipt of the hazardous waste must be kept on file.
RESPONSIBILITY:	Operational Manager, Safety Officer and Waste removal contractor
TIME FRAME:	Current operational phase.

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**Table 18: OPERATIONAL PHASE – Bio-Physical: Contamination**

<b>Bio-Physical: Contamination</b>	
<b>PHASE:</b>	<b>Operational</b>
<b>IMPACT:</b>	<b>ADVERSE</b>
<b>TASK/ENVIRONMENTAL IMPACT:</b>	<p>Land can become contaminated due to releases of hazardous materials, wastes and oils. Releases of these materials may be the result of historic or current site activities, including accidents during their handling and storage, or due to poor management or disposal.</p> <p>Land is considered contaminated when it contains hazardous materials concentrations, including oil, above baseline and/or naturally occurring levels. Contaminated soils may involve topsoils or subsurface soils that, through leaching and transport, may affect groundwater, surface water, and adjacent sites.</p> <p>Common spillage occurs due to mechanical breakdown in vehicles or transfer of oil or fuel from one receptacle to another.</p>
<b>OBJECTIVE:</b>	Prevent pollution of ground and surface water and the environment as a whole.
<b>ACTION REQUIRED:</b>	<ul style="list-style-type: none"> <li>➤ Soil contamination should be avoided by preventing or controlling the release of hazardous materials, hazardous wastes, or oil to the environment. When soil contamination is suspected or confirmed during operations, the cause of the uncontrolled release should be identified and corrected to avoid further releases and associated adverse impacts.</li> <li>➤ Create specially designated areas for vehicle, machinery and equipment maintenance.</li> <li>➤ Good maintenance and housekeeping practices will minimize the potential for spills to occur and the resulting rehabilitation of soil on site.</li> <li>➤ If hazardous spillage does occur, it must be stopped and cleaned immediately.</li> <li>➤ Temporary hazardous storage and refuelling areas must be bounded with an impermeable liner to protect groundwater quality.</li> <li>➤ Temporary storage areas containing hazardous substances/ materials must be clearly signed. Staff handling hazardous substances/ materials must be aware of their potential impacts and follow appropriate safety measures.</li> </ul>
<b>TARGETS TO MONITOR COMPLIANCE AND REPORTING THERE ON:</b>	<p>Hazardous materials should be stored at demarcated areas taking into account health and safety requirements and MSDS requirements for handling and storage.</p> <p>A spill report must be kept recording what type of spill, the severity, the location and corrective action taken to mitigate the impact to the environment.</p> <p>Spill kits, drip trays, funnels and an adequate supply of absorbent must be available on site.</p>
<b>RESPONSIBILITY:</b>	General Manager / Environmental Compliance Officer.
<b>TIME FRAME:</b>	Current operational phase.

## 9. CONCLUSION

The operations of the existing warehouse and bulk storage facility of **Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region** will see the export of metal ores originating from SADC through the Port of Walvis Bay. This will have a positive impact on the economy of Walvis Bay and Namibia as a whole. Various businesses will be supported along the different transport routes and within Walvis Bay.

Regulations related to the handling and transport of goods as prescribed by Namibian law, or according to international best practice standards where Namibian law is lacking, must be followed during the operational phase of the project. The necessary permits and approvals must be obtained from the relevant authorities. Dust suppression must be adequate to protect both employees and nearby receptors (businesses and residential areas). All hazardous substances (i.e., fuel) should be handled and stored according to MSDS requirements which include storage in bunded areas with sufficient spill containment infrastructure and segregation of incompatible products. Noise pollution should at all times meet the prescribed Health and Safety Regulations of the Labour Act and WHO requirements to prevent hearing loss and to minimize nuisance. 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

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disposed of at an appropriate site or re-used or recycled where possible. Hazardous waste must be disposed of at an approved hazardous waste disposal site by a registered hazardous waste disposal contractor.

The updated EMP should be used as an on-site reference document for the operations of the site. Parties responsible for the transgression of the EMP should be held responsible for any rehabilitation that may need to be undertaken. **Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region** 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) find that the impacts and related mitigation measures, which have been proposed in this report are acceptable, the Environmental Clearance Certificate may be granted and renewed for **Reload Logistics Namibia (Pty) Ltd – Walvis Bay Warehouse, Erongo Region**. The Environmental Clearance Certificate issued, based on this document, will render it a legally binding document which should be adhered to.

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ANNEXURE A: ENVIRONMENTAL INCIDENT LOG

Date	Incident	Comments <i>(Include any possible explanations for current condition and possible responsible parties. Include photographs, records etc. if available)</i>	Mitigation Measure <i>(Give details and attach documentation as far as possible)</i>	ECO Signature



## ANNEXURE B: COMPLAINTS RECORD SHEET

[illegible]