NANI IMPORT AND EXPORT CC

ENVIRONMENTAL MANAGEMENT PLAN REPORT

THE CONSTRUCTION AND OPERATION OF A GENERAL STORAGE FACILITY AND NON-HAZARDOUS PUTTY POWDER PROCESSING PLANT, LOCATED ON PORTION 8 OF REMAINDER OF FARM 38, WALVIS BAY, ERONGO REGION, NAMIBIA

NOVEMBER 2025

DOCUMENT CONTROL	
REPORT TITLE	ENVIRONMENTAL MANAGEMENT PLAN FOR THE CONSTRUCTION AND OPERATION OF A GENERAL STORAGE FACILITY AND NON-HAZARDOUS PUTTY POWDER PROCESSING PLANT, LOCATED ON PORTION 8 OF REMAINDER OF FARM 38, WALVIS BAY, ERONGO REGION, NAMIBIA
I.N.K PROJECT NO	EB46
ENVIRONMENTAL CONSULTANT	I.N.K ENVIRO CONSULTANTS CC
PROPONENT	NANI IMPORT AND EXPORT CC
PROJECT MANAGER AND REPORT AUTHOR	IMMANUEL N. KATALI
DATE OF REPORT COMPILATION	NOVEMBER 2025
PROPONENT ADDRESS	P.O. BOX 24 ROBERT MUGABE AVENUE WINDHOEK, NAMIBIA
CURRENT REVISION	FINAL

ENVIRONMENTAL CONSULTANT'S EXPERTISE

I.N.K Enviro Consultants cc is the independent firm of environmental consultants that has been appointed by Nani Import and Export cc to compile this EMP.

Immanuel N. Katali, an Environmental Assessment Practitioner, possesses a Bachelor of Arts (Honours) in Geography, Environmental Studies, and Sociology, and is currently pursuing a Master of Philosophy in Sustainable and Environmental Health Studies at Africa Research University (ARU). With a decade of pertinent experience in conducting and overseeing Environmental and Social Impact Assessments (ESIAs) as well as Environmental Compliance and Monitoring Audits in Namibia, Immanuel is recognized as a certified Environmental Assessment Practitioner by the Environmental Assessment Professionals Association of Namibia (EAPAN).

DECLARATION OF INDEPENDENCE AND DISCLAIMER

I.N.K Enviro Consultants cc herewith declare that this report represents an independent assessment of the proposed Construction and Operation of a General Storage Facility and Non-Hazardous Putty Powder Processing Plant, on the request of Nani Import and Export cc.

The Environmental Consultant has prepared this report based on an agreed scope of work and acts in all professional manner as an Independent Environmental Consultant to Nani Import and Export cc and exercises all reasonable skill and care in the provision of its environmental professional services and in a manner consistent with the level of expertise exercised by members of the environmental profession.

The information, statements and commentary contained in this report have been prepared by I.N.K Enviro Consultants cc from information provided by Nani Import and Export cc. I.N.K Enviro Consultants cc does not express an opinion as to the accuracy or completeness of the information provided, the assumptions made by the party that provided the information, or any conclusions reached. I.N.K Enviro Consultants cc has based this report on information received or obtained, on the basis that such information is accurate and, where it is represented to I.N.K Enviro Consultants cc as such, complete.

I.N.K Enviro Consultants cc is not responsible and will not be held liable to any other person or organization for any loss or damage suffered by any other person or organization arising from matters dealt with or conclusions expressed in this report.

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1.1 Purpose of the Report

The Environmental Management Plan (EMP) will be implemented during construction and operation. The EMP contains the recommended and control/mitigation measures for implementation and monitoring.

EMP implementation is a cyclical process that converts mitigation measures into actions and through cyclical monitoring, auditing, review and corrective action, ensure conformance with stated EMP aims and objectives. Through monitoring and auditing feedback for continual improvement in environmental performance must be provided and corrective action taken to ensure that the EMP remains effective.

1.2 Project Background

Nani Import and Export cc (hereinafter referred to as “Nani Import and Export”) intends to construct and operate a general storage facility and non-hazardous putty powder processing plant, located on portion 8 of remainder of farm 38, Walvis Bay, Erongo Region, Namibia. The proposed land portion measures approximately 90, 013 square meters (sqm2). Refer to Figures 1 and 2.

The objective is to construct warehouses (ranging between 1000-2000 sqm2) designated for storage facilities, with one warehouse incorporating a processing plant dedicated to the production of putty powder. Putty powder, a calcium-based compound (referred to as Polyfilla in Namibia), is utilized to fill cracks in walls prior to the application of paint.

A Putty Powder Processing Plant is an automated system that mixes various raw materials like calcium carbonate, talcum powder, and emulsions into a high quality wall putty. Key components include a dust collector, mixer, storage silos, conveying systems, weighing systems and automated packaging machines, our capacity for small-scale (1-5 tons/hour).

I.N.K Enviro Consultants cc (I.N.K), an independent firm of environmental consultants, has been appointed by Nani Import and Export to compile the EMP for this project

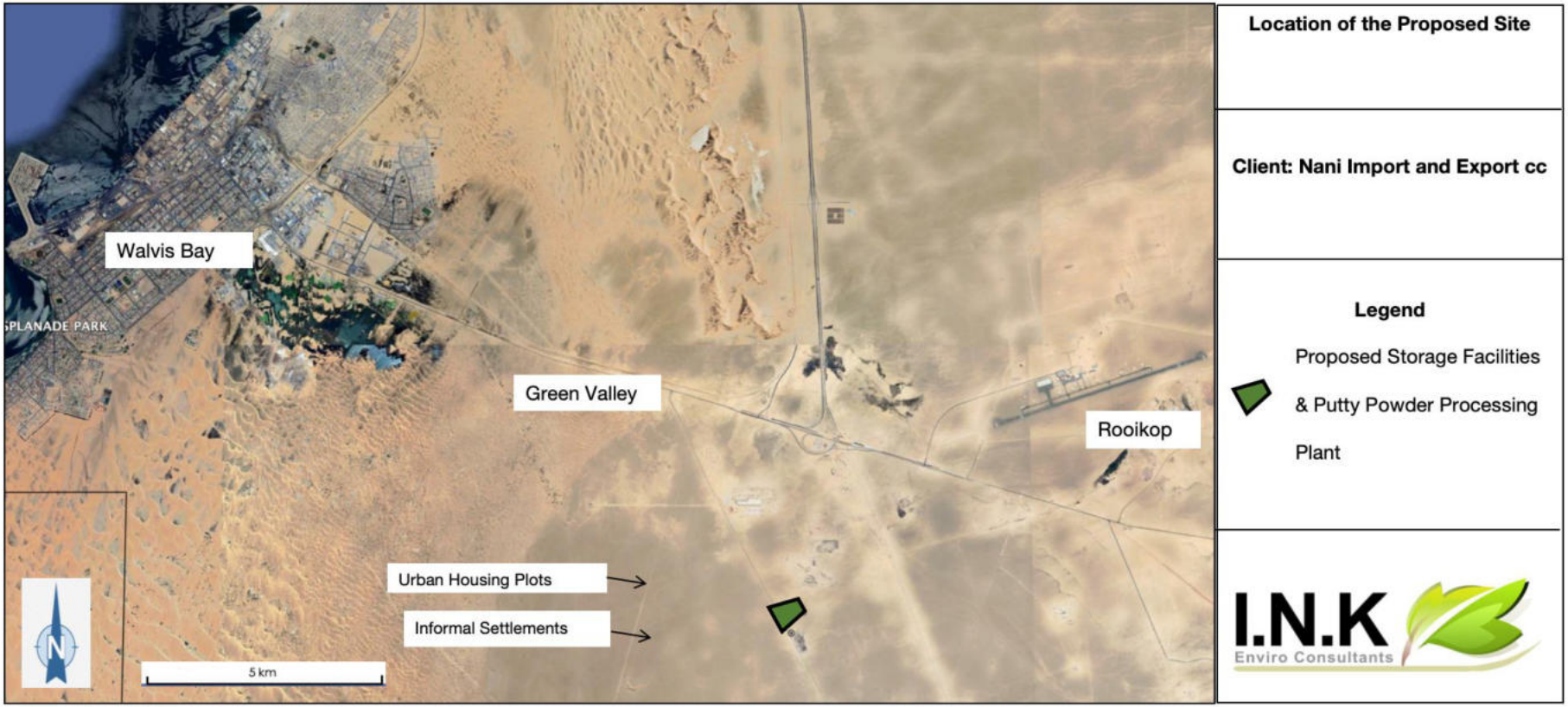

Figure 1: Project Site Location

Figure 2: Site Layou

2 IDENTIFICATION OF APPLICABLE ENVIRONMENTAL GUIDELINES

2.1 The Namibia Constitution (1990)

As the main source of legislation, the Constitution of the Republic of Namibia (1990) makes provision for the creation and enforcement of applicable legislation. In this context and in accordance with its constitution, Namibia has passed numerous laws intended to protect the natural environment and mitigate against adverse environmental impacts.

2.2 Environmental Management Act No 7 of 2007

The EIA Policy (1995) is enforced through the Environmental Management Act, 7 of 2007 and the EIA Regulations of 6 January 2012 (EIA Regulations). In terms of this legal framework, no party, whether private or governmental, can conduct a listed activity without an ECC obtained from the Environmental Commissioner.

2.3 Pollution Control and Waste Management Bill

This Bill is not yet promulgated so is not in force. The Act will regulate the discharge of pollutants to the air, water and land; it will regulate noise, dust and odour pollution; and it will establish a framework for integrated pollution prevention and control.

2.4 Atmospheric Pollution Prevention Ordinance No. 11 of 1976

This Ordinance provides for the prevention of pollution of the atmosphere. Part II deals with control of noxious or offensive gases, which applies to the emissions from a crematorium.. Namibia has no local air quality standards, so international criteria are used. The most widely referenced international air quality standards are those published by the World Health Organisation (WHO). The South African National Ambient Air Quality Standards (Crematoria and Veterinary Waste Incineration) as indicated in Table 1 below are also applicable.

2.5 Public and Environmental Health Act (No. 1 of 2015)

This Act provides a framework for a structured uniform public and environmental health system in Namibia. The act identifies health nuisances, such as chimneys emitting smoke in quantities that can be offensive, injurious or dangerous to health, which are

liable to be dealt with. Under this Act, all Local Authorities must take measures to prevent unhygienic or offensive conditions in their jurisdiction, and must prevent occurrence of health risks.

2.5.1 Air Quality Act (No. 39 of 2004)

To reform the law regulating air quality in order to protect the environment by providing reasonable measures for the prevention of pollution and ecological degradation and for securing ecologically sustainable development while promoting justifiable economic and social development.

2.6 Labour Act of 2007 (Act 11)

The Labour Act of 1992 (Act 6), the New Labour Act of 2007 (Act 11) and Government Notice 156 of 1997: Labour Act, 1992: Regulations Relating to the Health and Safety of Employees at Work, governs working conditions of employees. These regulations are prescribed for among others safety relating to hazardous substances, exposure limits and physical hazards.

3 DESCRIPTION OF THE CURRENT ENVIRONMENT

This section was compiled utilizing the following sources of information:

- Visual observations during a site visit by I.N.K.
- Google Earth.
- Internet sources.

3.1 Climatic Conditions

The weather at the coast is significantly different from that to the inland. There is little rain at the coast, the average temperatures are much lower, radiation and sunshine is less and frost is absent. Yet, the winds are stronger and humidity is higher due to frequent fog. The climate of the area is mainly influenced by the Benguela Current and the South Atlantic Anticyclone. The Walvis Bay area experiences over 125 days of fog per year. February, which is the most humid month in Walvis Bay, can reach over 90% humidity whereas June is 60-70% humid.

3.1.1 Temperature

The average annual temperature is less than 16˚C. The sites, as well as the rest of Walvis Bay are situated within the Coastal Fog Zone. This zone forms a band along the coast of approximately 20 km in width. As a result of this, the climate is predominantly cool and humid with frequent fog occurring.

3.1.2 Precipitation

The mean annual precipitation (MAP) at the coast is very low, with much of the precipitation being associated with fog (the Atlas of Namibia quotes the average number of fog days at Walvis Bay as 146) and only occasional rainfall events. The Meteorological Office had a rainfall station at Pelican Point for a number of years and the record from this shows the MAP is 9.5 mm, while the median is 3.8 mm. The monthly evaporation for all months is significantly higher than the rainfall, indicating that the area is a water negative area.

3.1.3 Wind

Wind is a dominating feature of the coast. The presence of the subtropical South Atlantic Anticylcone (SAA) off the coast of Namibia strongly influences the wind pattern, generating gale force winds along the coast in all seasons, but most frequently during

mid-summer and spring. Although their strength decreases inland, their effect is noticeable for distances of up to 200 km from the coast. The daytime and night time wind roses for Walvis Bay are provided in Figure 5.

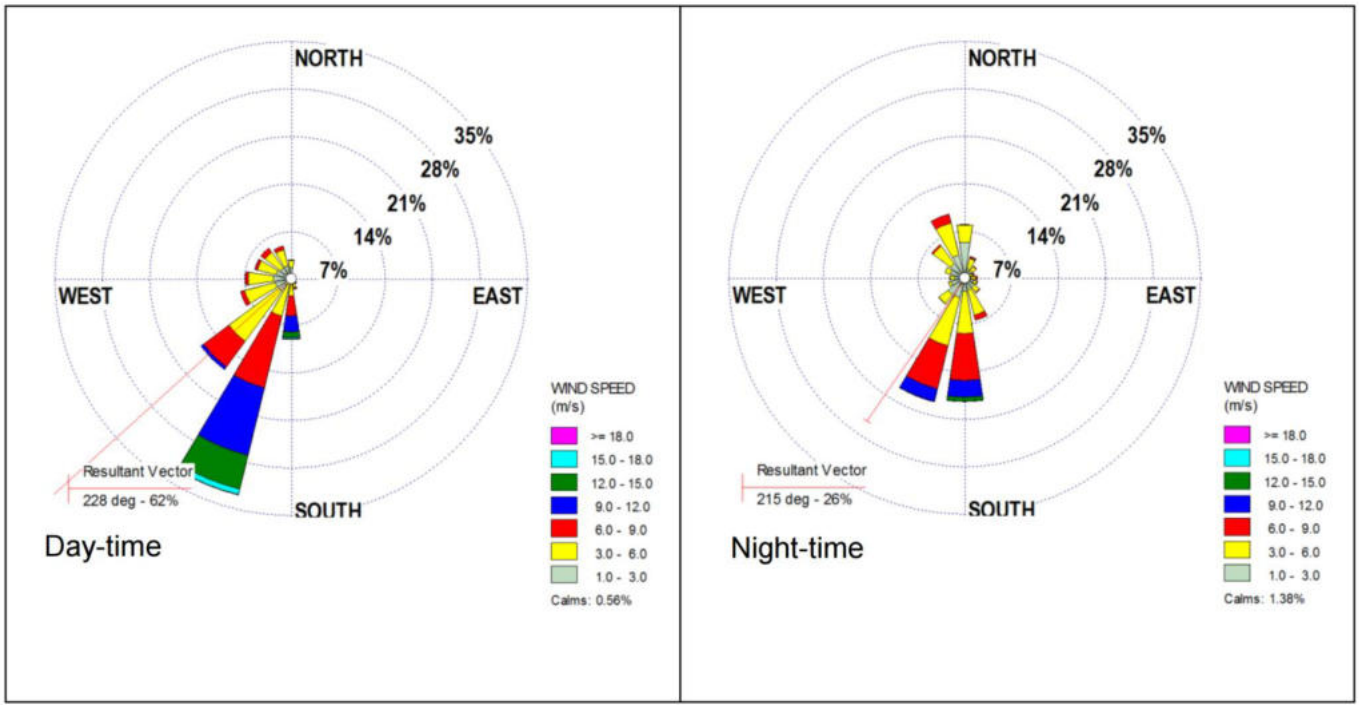

Figure 3: Day time and night time wind roses (SLR, 2016)

The prevailing wind direction at Walvis Bay is from the south-southwest, southwest and the south. During the day the south-southwesterly winds were more dominant with a shift to more frequent southerly winds during night-time. As is typical of night-time conditions the percentage calm conditions increase and the wind speeds decrease. Day-time wind speeds exceeding 5.4 m/s occurred for 32% of the time with the maximum recorded at 22.5 m/s.

3.2 Noise

The only source of noise in the area is generated by the vehicles and trucks on the roads and the day-to-day industrial activities.

Existing noise sources within and around the project site include:

- natural sounds from wind.
- vehicle and truck movement on the public road network.

- noise arising from the day to day activities associated with the industrial area.

Potential receptors of noise are the neighboring businesses. The sensitivity of noise receptors usually increases at night when conditions are still, and ambient noise levels are at their lowest. The typical daytime noise levels in an industrial area is 70 db (Safetch, 2009).

3.3 Social and Economic Environment

3.4 Land-use

The surrounding land at the site is used for typical industrial developments such as the charcoal business east of the site. Therefore, the general land use of the area is industry. However, a residential area is located approximately 200 m southwest of the site.

3.5 Health

Walvis Bay has a main district government hospital and a private hospital, the Kuisebmond health centre and three clinics – Narraville, Coastal and Walvis Bay clinics. The main health challenges as listed by the Ministry of Health and Social Services are HIV/AIDS, TB, substance abuse, respiratory system diseases and children in need of care.

3.6 Walvis Bay Economy

The economy of the town is largely built around fishing, the port, tourism and salt production.

4 EMP ADMINISTRATION

Copies of the EMP shall be kept at the site office and will be distributed to all senior contract personnel. All senior personnel shall be required to familiarize themselves with the contents of this document.

5 ROLES AND RESPONSIBILITIES

The implementation of the EMP requires the involvement of several stakeholders, each fulfilling a different but vital role to ensure sound environmental management during each phase.

5.1 SHEQ Manager

The SHEQ Manager will delegate powers to the Operations Manager and Supervisors who will be required to execute the responsibilities, in compliance with relevant legislation and the EMP.

Any on-site decision regarding environmental management is ultimately shared between the SHEQ Manager, and Operations Manager, having the following responsibilities in terms of the implementation of this EMP:

- Assisting in finding environmentally responsible solutions to problems with input from Supervisors and relevant personnel where necessary.
- Taking appropriate action where the mitigations/recommendations are not followed.
- Monitoring the undertaking of environmental awareness training for all new personnel coming onto site.

5.2 Operations Manager/Supervisors

The Operations Manager and/or Supervisors will be competent persons (SHE Reps) appointed by Nani Import and Export or its subsidiaries to implement the on-site environmental management of this EMP. The Operations Manager and/or Supervisor shall be on site daily and their duties will include the following:

- Maintaining open and direct lines of communication with the SHEQ Department regarding environmental matters.
- Daily site inspections of all areas regarding compliance with the EMP.
- Daily monitoring and verifying adherence to the EMP monitoring and verifying that environmental impacts are kept to a minimum.

- Assisting the SHEQ Department in finding environmentally responsible solutions to problems.

6 ENVIRONMENTAL MONITORING AND AUDITING

Auditing should be conducted bi-annually by an Independent Environmental Consultant. Benefits derived from the audit process may include:

- Identification of environmental risk.
- Development or improvement of the environmental management system.
- Avoidance of financial loss.
- Avoidance of legal sanctions.
- Increase in staff awareness.
- Identify potential cost savings.
- Improve dealings with employees, environmental groups, the community, regulators, media, shareholders, or insurance & finance institutions.
- Establish a history of environmentally responsible operational activities, e.g., through environmental incident reports, environmental monitoring and recording, and reporting to committees or authorities.
- Commonly, the audit of a site will cover all management procedures, operational activities and systems, and environmental issues. The environmental audit will be compiled objectively and conducted by independent entity.

7 ENVIRONMENTAL AWARENESS

Nani Import and Export shall ensure that the EMP is distributed to all relevant personnel. It is the responsibilities of the Operations Manager and Supervisors to ensure that the workers comply to the EMP measures during operations.

As a minimum, the Operations Managers and Supervisors, along with the SHEQ Coordinator should:

- Explain the importance of complying with the EMP.
- Discussion of the potential environmental impacts of operational activities.
- The benefits of improved personal performance.
- Employees' roles and responsibilities including emergency preparedness.

- Explanation of the mitigation measures that must be implemented when carrying out their activities.
- Explanation of the specifics of this EMP and its specification (no-go areas, etc.)
- Explanation of the management structure of individuals responsible for matters pertaining to the EMP.
- The Operations Manager and Supervisors shall keep records of all environmental training sessions, including names, dates and the information presented.

8 PUBLIC PARTICIPATION AND STAKEHOLDER ENGAGEMENT

An ongoing process of public participation shall be maintained during operations to ensure the continued involvement of interested and affected parties (I&APs) in a meaningful way. The issues that may arise from the public shall be recorded and presented to the environmental consultant during the bi-annual compliance auditing.

8.1 Identification of Stakeholder Groups

A stakeholder for the proposed project is defined as a person, group or organisation that has direct or indirect stake in a Project/organization because it can affect or be affected by the Project or its Proponents' actions, objectives and policies. Stakeholders vary in terms of degree of interest, influence and control they have over the Project or the proponent.

8.2 Stakeholder Mapping and Analysis

Stakeholder mapping is a process of examining the relative influence that different individuals and groups have over a project as well as the influence of the project over them. The purpose of a stakeholder mapping is to:

- Identify each stakeholder group.
- Understand each group's specific issues, concern and expectations from the project.
- Measure their influence on the project.

Apart from categorization, stakeholders have also been classified in accordance with the level of influence they have over the Project as well as their priority to the Project

proponent in terms of importance. The influence and priority have both been primarily rates as:

- **High Influence/Priority:** Which implies a high degree of influence of the stakeholder on the Project in terms of participation and decision making or a high priority for the Project proponent to engage that stakeholder.
- **Medium Influence/Priority**: Which implies a moderate level of influence and participation of the stakeholder in the Project as well as a priority level for the Project proponent to engage the stakeholder who are neither highly critical nor are insignificant in terms of influence.
- **Low Influence/Priority**: Which implies a low degree of influence of the stakeholder on the Project in terms of participation and decision making or a low priority for the Project proponent to engage.

Table 1: Stakeholder Significance and Engagement Required

Magnitude of Influence / Impact	Urgency / Likelihood of Influence on / by Stakeholder		
	Low	Medium	High
Negligible	Negligible	Negligible	Negligible
Small	Negligible	Minor	Moderate
Medium	Minor	Moderate	Urgent
Large	Moderate	Urgent	Urgent

8.3 Stakeholder Engagement Strategy

The Stakeholder Engagement Plan (SEP) shall be informed by a set of principles defining its core values underpinning interactions with identified stakeholders. Common principles based on international best practice.

Commitment is demonstrated when the need to understand, engage and identify the community is recognized and acted upon early in the process; Integrity occurs when engagement is conducted in a manner that fosters mutual respect and trust; Respect is created when the rights, cultural beliefs, values and interests of stakeholders and affected communities are recognized; Transparency is demonstrated when community concerns are responded in a timely, open and effective manner; Inclusiveness is

achieved when broad participation is encouraged and supported by appropriate participation opportunities; Trust is achieved through open and meaningful dialogue that respects and upholds beliefs, values and opinions.

8.4 Engagement and Disclosure Methods

The Social and Community Supervisor shall be responsible for maintenance of the records of along with the members that engage with stakeholders during construction and operations phase, along with addition of any new categories identified.

8.5 Grievance Redress Mechanism (GRM)

A grievance would usually mean some form of concern by a stakeholder which needs to be redressed in order to continue smooth implementation of the project. The GRM to uphold the Project's development outcomes as well as its social and environmental performance is designed to address concerns and complaints promptly and transparently with no direct or indirect retaliation on the aggrieved party. Grievances raised by stakeholders will need to be managed through an accountable and transparent process, at no cost.

The GRM will work within the existing national legal and accountability framework and will provide an additional opportunity to stakeholders and interested parties to resolve their project specific grievances. Therefore, a Grievance Redress Committee (GRC) should be established to address this need.

8.6 Grievance Handling Procedure

Any grievance reported will be brought to the notice of the proponent. The proponent should share prepare a Grievance form and make it available on their website, to the community. Grievance should then be submitted to the proponent via email or hardcopy submissions to the proponent as per the address indicated on the form. Once the Grievances are validated, the proponent is required to provide swift communication that would be agreed between them and the Grieving Party. The GRM table and process flow is indicated below:

Table 3: GRM Steps

Step	Description	Timeline	Responsible Party
1. Submission	Grievance is submitted via various channels (phone, email, suggestion box, etc.)	Immediate	Community Liaison Officer / Focal Point
2. Acknowledgment	Confirmation of receipt is sent to the complainant (verbal or written)	Within 24 hours	Project Manager/GESI committee
3. Screening & Categorization	Grievance is reviewed, categorized (e.g., urgent, GBV-related), and logged	Within 5 working days	GESI committee
4. Investigation	Confidential and impartial investigation is conducted	Within 10 working days	GESI committee / Sector Specialist
5. Resolution & Response	Resolution is proposed and communicated to the complainant	Within 15 working days	Project Manager
6. Appeal (if needed)	Complainant may appeal if unsatisfied with the resolution	Within 10 working days of response	GESI committee
7. Closure	Grievance is marked as resolved and documented	Ongoing	Project Manager
8. Monitoring & Reporting	Trends and resolution rates are analyzed and reported regularly	Quarterly	Project Manager

The GRM is further summarized in a process flow diagram:

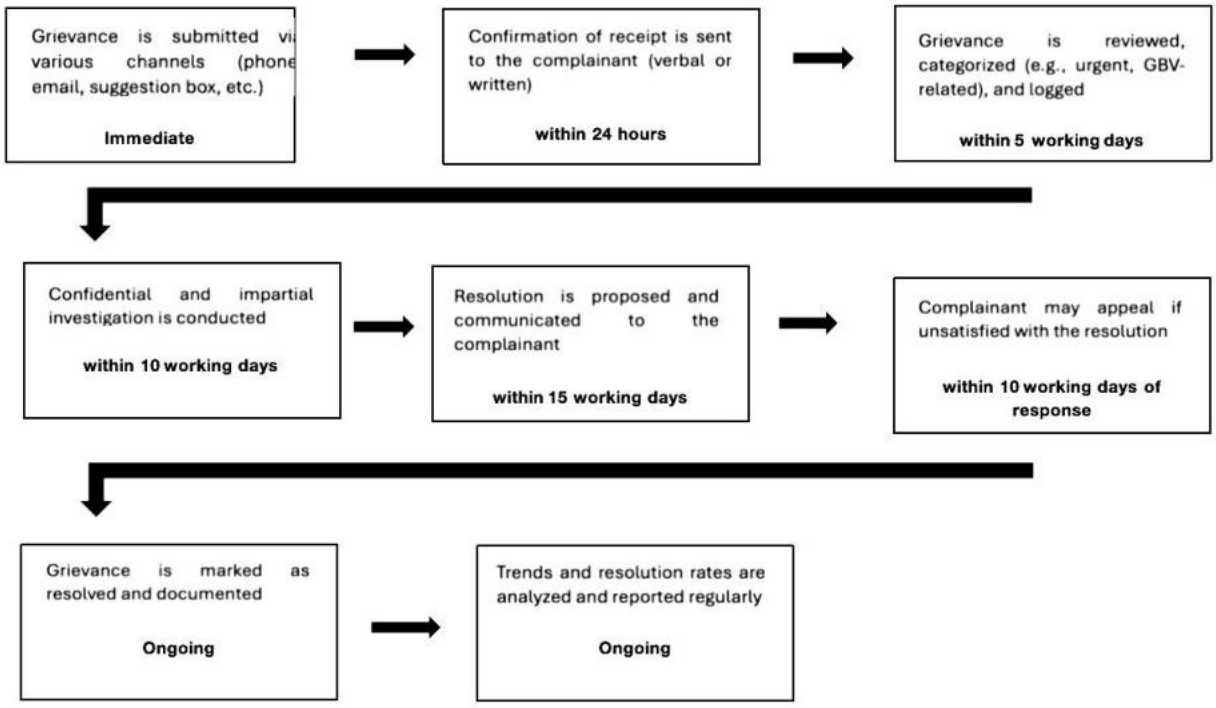

Figure 4: GRM Process Flow

9 ENVIRONMENTAL MANAGEMENT PLAN

9.1 Aims

The aim of the EMP is to detail the actions required to effectively implement mitigation and management measures. These actions are required to minimize negative impacts and enhance positive impacts associated with the operations.

It is important to note that an EMP is a living document in that it will be updated and amended as new information (e.g. environmental data), policies, authority guidelines, technologies and proposed activities develop. The conceptual management measures proposed to mitigate the potential impacts are detailed in the action plans below.

9.2 Roles and Responsibilities

It is the responsibility of Nani Import and Export to implement the measure (commitments) below and to ensure that all actions are carried out.

9.3 Management and Mitigation Measures

The management and mitigation measures for the proposed project are outlined in the table below.

Environmental Issue	Management & Mitigation Measures	Applicable Phase
Management and Monitoring	Nani shall ensure that all aspects of EMP are implemented during construction and operation. The environmental consultant shall conduct bi-annual site inspection and make provision for reporting on every aspect of the EMP.	Construction and Operations

Communication and Stakeholders Consultation	Nani shall take responsibility for the implementation for all provisions of this EMP and to liaise between community (neighbours) and the authorities (Walvis Bay Municipality and MEFT). Initiate an efficient Grievance Mechanism to allow potentially affected individuals to voice their concerns on the project. Ensure that workers have access to and are aware about the Grievance Mechanism. Ensure minimum legal labor standards as per ILO regulations (child/forced labor, no discrimination, working hours, minimum wages) are met. Nani should comply with relevant labor Laws as stipulated by the Labor act. Ensure all workers implement code of conduct concerning employment and workforce behavior (including but not limited to safety rules, zero tolerance for substance abuse, environmental sensitivity of the area, dangers of sexually transmissible diseases and HIV/AIDS, gender equality and sexual harassment, respect for the beliefs and customs of the populations and community relations in general.) In case of security personnel at the site, ensure proper training and in the use of force and appropriate conduct toward workers.	

Health and Safety	Nani shall prepare a strategy to ensure the least possible disruption to traffic and potential safety hazards during construction and operations. The strategy should include a schedule of work including when and how road crossings (operations at existing intersections) will be made. Proper traffic and safety warning signs must be placed at the facilities. The Contractor must adhere to the regulations pertaining to Healthy and Safety, including the provision of personal protective clothing. Dust protection masks shall be provided where required. The contractor must enforce relevant Health and safety Regulations for these specific activities. Ensure speed limits at the facility and on transporting routes. Use equipment and vehicles in appropriate technical conditions. Ensure vehicles and equipment are switched off when not in use. Use protective hearing equipment for workers conducting noisy activities. Maintain high standard in housekeeping on site. Provide necessary fire prevention equipment on site in line	Construction and Operations

	Suitable First Aid equipment must be provided. Contractor must provide appropriate ablution facilities for the employees during construction. Personnel may not relieve themselves in the surrounding environment. Demarcate/fence off construction activities. Appropriate personal protective equipment should be provided to the operator.	
Air Quality	Ensure that the processing plant is regularly serviced and maintained for optimal functioning, so that the manufacturer's claim that operations are safe with respect to emissions, is upheld.	Operations
	Application of dust suppression methods.	Construction and Operations
	Develop and implement a complaints register to record any 3rd party complaints relating to air pollution. Complaints must be investigated and actions developed.	
Noise	Focus activities more during the day when ambient levels are high from the day to day activities of the industrial area and less operational activities during nighttime.	Construction and Operations
	General operational activities, following good engineering practice should be applied including: o Regular maintenance of the Putty Powder Processing Plant o Enclosure of major sources of noise. The processing plant should be enclosed in a building/container to absorb noise, so that the nearby receptors not disturbed by this aspect.	
	Maintain machinery and equipment to prevent excessive noise.	
	Develop and implement a complaints register to record any 3rd party complaints relating to excessive noise. Complaints	

	must be investigated and actions developed. Where relevant a once off-noise monitoring campaign should be initiated to confirm operations noise.	
Vehicles will follow designated access routes.	Vehicles will follow designated access routes.	Construction and Operations
Site preparation for construction	Any additional excavations made in the area should be backfilled.	Construction
Waste Management and Hydrocarbon Spillages	No litter or waste accumulation will be permitted on site.	Construction and Operations
	Recycling will be promoted on site.	
	Ensure immediate clean-up of all diesel spills/leakages	
	Ensure proper removal of waste from site and disposal at licensed disposal site for general waste and hazardous disposal site for diesel containers and hydrocarbon spillages.	
	Bins with with lids in order to prevent wind-blown litter, will be provided at strategic locations through the site and will be emptied regularly in order to ensure no overflows.	
	Ensure suitable receptacles with lids for waste disposal is available on site at all times.	
	If rubbish containers are used, ensure these can be sealed from strong wind	
	Regular environmental awareness should include potential risks associated with hydrocarbons.	
	Spill kits will be readily available	
	Soil contaminated with hydrocarbons shall be excavated and and transported for disposal at the nearest disposal facility (Walvis Bay Hazardous Disposal Facility).	
Visual	No litter or waste accumulation will be permitted on site. Poor maintenance and housekeeping would result in the creation of a negative visual impact.	Construction and Operations

	Plant trees around the infrastructure in order to beautify the place, as well as a way of screening the negative visual impact of the buildings.	Operations
Traffic	Signage must be implemented to warn motorists of merging heavy vehicle traffic. The signs should be installed 200 m on either side of access roads to the site. As per the SADC Road Traffic Signs Manual, it is recommended that sign W344-WA be installed on a Class IV high visibility background, with supplementary plates indicating “heavy vehicle entering” and the distance to the crossing i.e. “200 m”.	Construction
	Ensure that an Emergency Response Plan is in place, in event of an accident.	Construction and Operations
	Ensure the trucks keep their distance from one another, to allow other road users to pass safely.	
	Clear signage to ensure adequate waste management response and safety within the project site.	
Groundwater and Surface Water	Any spillage on site to be cleaned up as soon at seen, to prevent rainwater contact. Ensure the floor of facility are in sound condition.	
Soils	All machinery and vehicles will be adequately maintained so as to prevent leaks and spills. Should any leaks and hydrocarbon spills occur, these will be contained and cleaned up immediately and disposed of at the Walvis Bay Hazardous waste facility. Carefully manage the storage and handling of hydrocarbons and other hazardous materials. Ensure that surface runoff is controlled and impacts on water	Construction and Operations

	resources are prevented. Spill kits will be readily available (i.e. in vehicles or close to transfer positions).	
Socio-economic	Plan for residents in Walvis Bay to form a significant part of the project hiring policy to give preference to Project Affected People (PAP) through recruitment and training.	Construction and Operations
	Local people particularly youth, women, and previously disadvantage community members be preferentially selected.	
	Begin local selection and provide technical training as soon as possible to enable local people to compete for the lower skilled jobs and upskill themselves.	
	Nani and all contractors shall encourage the use of small and medium sized enterprises in supplying goods and services to the Project.	
	Develop a relevant Corporate Social Responsibility Programme.	Operations
Chance archaeological find of any (i.e. human burial/remains fossils, chipped stone age tools, pre-modern artefacts (bone, wood, metal, glass and/or ceramic), etc.)	Preserve the site by demarcating the site with flagging / danger tape, and cease any work in the vicinity of the site.	Construction
	Notify the Project Manager.	
	Inform the National Heritage Council (NHC) of the find and take further instructions.	
	Actions recommended by the appropriate Authorities may include an archaeological assessment, site preservation, removal of fossils or artefacts.	
EMP implementation	The operator must be responsible for environmental	Construction and

	management and compliance.	Operations
	The operator must be made aware of, and familiar with, site operations during operations, the key environmental issues and consequences of non-compliance to the EMP.	
	Ensure ongoing awareness and compliance.	
Rehabilitation	All construction sites should be photographed (1) before commencement, (2) after completion and (3) after rehabilitation of the activities. Inspect to ensure rehabilitation measures are implemented	Construction
	All unused equipment and material will be removed from all sites;	
	All litter from the construction sites will be taken to an appropriate disposal site.	
	All debris, scrap metal, etc. will be removed.	
	All small ditches/ trenches will be covered and contoured.	
	Impacted footprints outside are to be raked	