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2025

ENVIRONMENTAL MANAGEMENT PLAN - for the Transportation of Hazardous Goods in Namibia for A and B Logistics (Pty) Ltd

ECT
ENVIRONAM CONSULTANTS TRADING

ENVIRONMENTAL MANAGEMENT PLAN

TRANSPORTATION OF HAZARDOUS GOODS IN NAMIBIA FOR A AND B LOGISTICS (PTY) LTD

PROJECT DETAILS

PROPONENT:

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Signature

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ABBREVIATIONS

DEA	Department of Environmental Affairs
EA	Environmental Assessment
EAP	Environmental Assessment Practitioner
ECC	Environmental Clearance Certificate
EIA	Environmental Impact Assessment
EMA	Environmental Management Act (Act No. 7 of 2007)
GPS	Global Positioning System
MET	Ministry of Environment and Tourism
AN	Ammonium Nitrate
ANE	Ammonium Nitrate Emulsion
ANS	Ammonium Nitrate Solution
ANFO	Ammonium Nitrate Fuel Oil
NCM	Namibia Chamber of Mines
NOISE	New Oil Inversion System of Emulsification
NSF	Native Storage Facility

1. INTRODUCTION

A AND B LOGISTICS (PTY) LTD (the proponent) is well-established in the logistics industry in Namibia and the SADC region and boasts a strong presence in Namibia and Zambia. The proponent has extensive experience and expertise in international freight forwarding and handling, and has earned a reputation for their exceptional capability and capacity. The proponent operates a fleet of approximately 40 trucks used in the receipt, handling and transportation of various commodities, in particular Ammonium Nitrate. The Ammonium Nitrate is mainly loaded directly from vessels at the Port of Walvis Bay (NAMPORT), and/or at the premises of Native Storage Facility at Farm 38, Walvis Bay.

According to Section 27 of the Environmental Management Act No. 7 of 2007, Hazardous Substance Handling and Storage activities may not be carried out without obtaining an Environmental Clearance Certificate (ECC).

The Proponent has thus appointed Environam Consultants Trading (ECT) to undertake the process of application for an ECC, in terms of the Environmental Management Act No. 7 of 2007 and its Regulations of 2012.

2. PROJECT DESCRIPTION

Phase 1: Port Operations & Customs Clearance (Walvis Bay)

- Receipt & Documentation: Receive shipping documents and verify against Bill of Landing.
- Port Handling: Coordinate with port authorities for the safe off-loading of ammonium nitrate from the vessel to a secured, designated staging area within the port.
- Customs Clearance: Manage all import/transit customs formalities with Namibian Revenue Authority (NAMRA).
- Pre-loading Inspection: Conduct thorough inspection of trucks and trailers for suitability and compliance before loading.

- Secure Loading: Supervise the loading of bulk ammonium nitrate into certified, airtight, and dedicated tipper trailers or bulk tankers.

Phase 2: Primary Land Transportation (Walvis Bay to Zambia Border)

- Fleet Deployment: Utilize a dedicated fleet of modern, powerful prime movers coupled with certified, well-maintained trailers.
- Route Planning: Pre-define and approve the most efficient and secure route: typically, Walvis Bay → Usakos → Otavi → Rundu → Kongola → Katima Mulilo → → Wenela Border Post → Zambia.
- In-Transit Security & Tracking: Each vehicle is equipped with:
    - Real-time GPS tracking with geofencing.
    - Immobilizer systems.
    - Direct communication link with a 24/7 control room.
- Driver Standards: All drivers are highly experienced, specially trained in hazardous goods transport (including emergency response), and vetted for security.

Phase 3: Border Crossing & Final Delivery in Zambia

- Border Facilitation: Manage the complex border crossing process at Wenela Border Post (Namibia).

3. ENVIRONMENTAL MANAGEMENT PLAN (EMP)

An EMP is one of the most important outputs of the EA process as it synthesises all of the proposed mitigation and monitoring actions, set to a timeline and with specific assigned responsibilities. The EMP details the mitigation and monitoring actions to be implemented during the following phases of this development:

- Planning and Design – the period, prior to construction, during which preliminary legislative and administrative arrangements, necessary for the preparation of the land, are made and engineering designs are carried out. The preparation of construction tender documents forms part of this phase;

- Construction – the period during which the proponent, having dealt with the necessary legislative and administrative arrangements, appoints a contractor for the construction of services infrastructure, buildings as well as any other construction process(s) within the development areas;
- Operation and Maintenance – the period during which the development will be fully functional, operational and maintained.

The operations are currently existing and ongoing. This EMP will therefore focus only on the operations and maintenance phase, excluding planning and design; and construction phases.

It is not envisaged to decommission the development in the immediate future. However, should this be considered at the end of its useful life, any disturbed areas have to be restored to *ante operam* conditions.

4. MANAGEMENT ACTIONS

A AND B LOGISTICS (PTY) LTD (the Developer) is ultimately responsible for the implementation of the EMP, from the planning and design phase to the decommissioning phase of this development, if the development is in future decommissioned. The developer will delegate this responsibility as the project progresses through its life cycle. The delegated responsibility for the effective implementation of this EMP will rest on the following key individuals:

- Developer's Representative;
- Environmental Control Officer; and
- Contractor (Construction and Operations and Maintenance).

4.1. DEVELOPER'REPRESENTATIVE

The Developer should assign the responsibility of managing all aspects of this development for all development phases (including all contracts for work outsourced) to a designated member of staff, referred to in this EMP as the Developer's Representative (DR). The Developer may decide to assign this role to one person for the full duration of the development, or may assign a different DR to each of the development phases – i.e., one for the planning and design phase, one for the construction phase and one for the operation and maintenance phase. The DR's responsibilities are depicted in Table as follows:

Table 1: DR's responsibilities

Responsibility	Project Phase
Making sure that the necessary approvals and permissions laid out in **Table 1** are obtained/adhered to	Throughout the lifecycle of this development
Making sure that the relevant provisions detailed in the tables in Chapter 7 are addressed during the various phases phase.	• Operation and maintenance
Suspending/evicting individuals and/or equipment not complying with the EMP	• Operation and maintenance
Issuing fines for contravening EMP provisions	• Operation and maintenance

4.2. ENVIRONMENTAL CONTROL OFFICER

The DR should assign the responsibility of overseeing the implementation of the whole EMP on the ground during the operation and maintenance phases to a designated member of staff, referred to in this EMP as the Environmental Control Officer (ECO). The DR/Developer may decide to assign this role to one person for both phases, or may assign a different ECO for each phase. During the operation phase the Developer may outsource the monitoring and evaluation of the EMP to an independent Environmental Consultant. The ECO will have the following responsibilities during the construction and operation and maintenance phases of these developments:

- Management and facilitation of communication between the Developer, DR, the contractors, and Interested and Affected Parties (I&APs) with regard to this EMP;
- Conducting monitoring inspections (recommended minimum frequency is once every second month) of all operational areas with respect to the implementation of this EMP (monitor and audit the implementation of the EMP);
- Assisting the Contractor in finding solutions with respect to matters pertaining to the implementation of this EMP;

- Advising the DR on the removal of person(s) and/or equipment not complying with the provisions of this EMP;
- Making recommendations to the DR with respect to the issuing of fines for contraventions of the EMP; and
- Undertaking an annual review of the EMP and recommending additions and/or changes to this document.

4.3.CONTRACTOR

Contractors appointed by the Developer are automatically responsible for implementing all provisions contained within the relevant chapters of this EMP. Contractors will be responsible for the implementation of this EMP applicable to any work outsourced to subcontractors. In order to ensure effective environmental management, the aforementioned chapters should be included in the applicable contracts for outsourced construction, operation and maintenance work.

The tables in **Chapter 7** detail the management measures associated with the roles and responsibilities that have been laid out in this chapter.

5. ASSUMPTIONS AND LIMITATIONS

This EMP has been drafted based on the review of information obtained from the proponent. ECT will not be held responsible for the potential consequences that may result from any alterations to the initial concept and operational description.

It is assumed that workforce will be sourced mostly from the Walvis Bay area and the broader Erongo Region.

6. APPLICABLE LEGISLATION

Legal provisions that have relevance to various aspects of this development are listed in **Table 2 below**. The legal instrument and applicable corresponding provisions are provided.

Table 2: Legal provisions relevant to this development

Legislation	Summary	Applicability
The Namibian Constitution	The Namibian constitution is the supreme law of the country which is committed to sustainable development. Article 95(1) of the Constitution of Namibia states that: - "The State shall actively promote and maintain the welfare of the people by adopting policies aimed at … The maintenance of ecosystems, essential ecological processes and biological diversity of Namibia and utilization of living natural resources on a sustainable basis for the benefit of all Namibians, both present and future".	Develop an EMP to manage potential environmental impacts
The Environmental Management Act	The Environmental Management Act No 7 of 2007 aims to promote the sustainable management of the environment and the use of natural resources and to provide for a process of assessment and control of activities which may have significant effects on the environment; and to provide for incidental matters. The act provides a list of activities that may not be undertaken without an environmental clearance certificate. Further, the Act ensures that; (a) Potential threats are considered timeously (b) Comprehensive stakeholder's consultations are conducted and all Interested and affected parties are given an opportunity to comment on the project (c) Decisions are robust by taking into account the above-mentioned activities	The project is a listed activity

Legislation	Summary	Applicability
Draft Pollution Control and Waste Management Bill	This Bill serves to regulate and prevent the discharge of pollutants to air and water as well as providing for general waste management. The Bill will repeal the Atmospheric Pollution Prevention Ordinance (11 of 1976) when it comes into force. The Bill also provides for noise, dust and odour control that may be considered a nuisance. Further, the Bill advocates for duty of care with respect to waste management affecting humans and the environment and calls for a waste management licence for any activity relating to waste or hazardous waste management.	Management of Waste, and any pollutant as a result of the operations
Atmospheric Pollution Prevention Ordinance Act No.11 of 1976)	This Ordinance serves to control air pollution from point sources, but it does not consider ambient air quality. This ordinance is being repealed by the proposed Pollution Control and Waste Management Bill. Any person carrying out a 'scheduled process' which are processes resulting in noxious or offensive gases typically pertaining to point source emissions have to obtain a registration certificate from the Department of Health.	To prevent the generation of excessive noxious or offensive gasses

Legislation	Summary	Applicability
Environmental Policy framework (1995)	This policy subjects all developments and project to environmental assessment and provides guideline for the Environmental Assessment. Its provision mandate that Environmental Assessment take due consideration of all possible impacts and incorporate them in the development or planning stages.	General requirement of the EIA and guidelines
The Occupational Safety and Health Act No. 11 of 2007	Safety: A safety risk is a statistical concept representing the potential of an accident occurring, owing to unsafe operation and/or environment. In the working context "SAFETY" is regarded as "free from danger" to the health injury and to properties. Health: Occupational Health is aimed at the promotion and maintenance of the highest degree of physical, mental and social wellbeing of workers in all occupations. This is done by ensuring that all work-related hazards are prevented and where they occur, managed.	Handling of dangerous good, fire and explosion risk In order to maintain good and healthy standards at the work place, cleanliness, adequate sanitary facilities, protection against dangerous substances as well as education and training of both workers and management is necessary.
Water Resources Management Act (2004)	This Act provides a framework for managing water resources based on the principles of integrated water resources management. It provides for the management, development, protection, conservation, and use of water resources. Furthermore, any watercourse on/or in close proximity to the site and associated ecosystems should be protected in alignment with the listed principles.	Water resources should be protected from pollution.

Legislation	Summary	Applicability
Petroleum Product and Energy Act No, 13 of 1990	This Act provides a framework for handling and distribution of petroleum products which may include purchase, sale, supply, acquisition, possession, disposal, storage or transportation thereof.	Safe handling of hydrocarbons
Labour Act No. 6 of 1992	This Act aims to regulate labour in general and includes the protection of the health, safety and welfare of employees. The 1997 Regulations relating to the Health and Safety of employees at work sets out the duties of the employer, welfare and facilities at the workplace, safety of machinery, hazardous substances, physical hazards, medical provisions, construction safety and electrical safety.	No employer shall require or permit an employee to work in an environment that is deemed unfit without protective measures in place.
Regional Council Act, 1992 (Act No. 22 of 1992)	The Regional Councils Act legislates the establishment of Regional Councils that are responsible for the planning and coordination of regional policies and development. The main objective of this Act is to initiate, supervise, manage and evaluate development at regional level.	Adhere to regional by laws
Soil Conservation Act No. 76 of 1969	This act promotes the conservation of soil, prevention of soil erosion.	Avoid actions that can cause soil degradation and erosion.
Hazardous Substances Ordinance No. 14 of 1974	This ordinance gives provision to control the handling of hazardous substance in all circumstances, such as manufacturing, imports and exporting of these to ensure human and environmental safety.	Handling of fuel, ANE, and explosion risks

Legislation	Summary	Applicability
National Heritage Act No. 27 of 2004	The Act makes provision for the protection and conservation of places and objects of heritage significance and the registration of such places and objects. Part V Section 46 of the Act prohibits removal, damage, alteration or excavation of heritage sites or remains, while Section 48 sets out the procedure for application and granting of permits such as	Always report discovery of potential heritage resources to the authorities.
International Best Practises	***Precautionary Approach Principle*** This principle is worldwide accepted when there is a lack of sufficient knowledge and information about the possible threats to the environment. Hence if the anticipated impacts are greater, then the precautionary approach is applied. In this project, there are no eminent uncertainty however in cases when they arise, this approach should be applied. ***Polluter Pays Principle*** This principle ensures that proponents take responsibility of their actions. Hence in cases of pollution, the proponent bears the full responsibility to clean up the environment.	In the event of an accident, where spillage may occur, the proponent must be responsible to clean up the environment.

7. MANAGEMENT ACTIONS

The aim of the management actions in this chapter of the EMP is to avoid potential impacts where possible. Where impacts cannot be avoided, measures are provided to reduce them.

The following tables provide the management actions recommended to manage the potential impacts for this operation. These management actions have been organised temporally according to operation and maintenance project phases:

The responsible persons at the Developer's team have assessed these commitments in detail and have committed to the specific management actions were indicated in the tables below.

Table 3: Mitigation measures during operations and maintenance phases

EMP Component	Key Action / Control Measure	Responsibility	Frequency/Timing
1. Legal Compliance	Register with and obtain all necessary permits from MEFT, Namibia Port Authority etc.	HSE Officer / Management	Before operations commence; renew as required.
	Maintain an up-to-date register of all applicable laws and standards.	HSE Officer	Bi-annual review.
	An Environmental Practitioner should be appointed to monitor the implementation of the EMP, and recommend any changes to this document when necessary.	Management	Once every 2 months
	Bi-annual reports are to be submitted to the Environmental Commissioner.	Environmental Consultant / Management	Bi-annually
	Ensure timely application for renewal of ECC upon expiry.	HSE Officer / Management	Prior to expiry of ECC
2. Staff Induction	Formalize recruitment of all staff with Contracts, stating nature of employment, duration and remuneration to protect both parties and avoid labour disputes later on.	Management	Before and during the course of employment.
	Induction for all staff / employees on the provisions of the EMP before work commencement, covering but not limited to: environmental awareness, emergency response, Reporting of incidents, HIV/AIDS awareness, alcohol and substance abuse, and Safety, Health and Environment (SHE) measures.	Management	At start of employment.
	Staff operating vehicles shall be adequately trained and sensitized to any potential hazards associated with their tasks.	HSE Officer / Management	Before and during the course of employment.
	Conduct quarterly induction reviews.	HSE Officer / Management	Quarterly
	Ensure that a copy of EMP is accessible to all employees.	HSE Officer / Management	At the start and during the course of employment.
	Adopt a disciplinary system to discipline staff for non-compliance, such as littering, speeding, safety risk both to themselves and to others, etc.	HSE Officer / Management	During the course of employment.

EMP Component	Key Action / Control Measure	Responsibility	Frequency/Timing
3. Communication	Develop a communication strategy.	Management	During the course of operations.
	All correspondence should be written and signed off by witnesses (e.g., manager and team leaders).	Management	During the course of operations.
	The contact numbers for the Manager and Team Leaders must be available in case of emergencies.	Management	During the course of operations.
4. Vehicle & Equipment Integrity	Conduct daily pre-trip inspection (tires, brakes, seals, fire equipment).	Driver	Before each journey.
	Perform comprehensive mechanical and safety inspection.	Maintenance Manager	Quarterly & before major trips.
	Ensure all vehicles are ADR-certified and fit for purpose.	Transport Manager	Before deployment for hazardous goods.
	All vehicles and equipment shall be kept in good working condition and serviced regularly (in accordance with the servicing frequency of the specific machinery), in order to prevent leakages and emissions	Maintenance Manager	Respective service intervals and during the course of operations.
5. Spill Prevention & Control	Use bunded, impermeable areas for loading/unloading.	Operations Manager	Every loading/unloading event.
	Equip all vehicles with spill kits (absorbents, shovels, containers).	Transport Manager	Check weekly; replenish after use.
	Train staff on correct procedures and use of spill kits.	HSE Officer	Upon induction; annual refresher.
	Ensure that personnel handling the bags and storage equipment are made aware of the risk associated with the various commodities so that they know the potential impact on them.	HSE Officer	Continuously.
	Ensure a personnel monitoring programme is set up in accordance with the guidelines of existing accepted practice and the Labour Act of Namibia.	HSE Officer	During the course of operations.
	Check all bulk bags prior to filling to ensure they are not damaged.	HSE Officer	Every loading/unloading event.
	Use dust suppressant technologies to manage dispersal and pollution.	HSE Officer/ Operations Manager	Continuously.

EMP Component	Key Action / Control Measure	Responsibility	Frequency/Timing
	Once dust plumes that cannot be contained becomes visible, all operations must cease with immediate effect and only restart once sufficient mitigation measures have been implemented or when the cause of dust subsides. Operational processes include activities such as handling and loading / offloading of ore at the bulk storage yard, transport through town, offloading in the port, etc.	HSE Officer/ Operations Manager	Continuously.
	All truck loads must be suitably covered to prevent the escape of dust from the load bin. This includes empty trucks that may still contain some dust.	HSE Officer/ Operations Manager	Every loading/unloading event.
	Minimise the duration of stockpiles.	HSE Officer/ Operations Manager	Continuously.
6. Fire & Explosion Prevention	Enforce strict smoking, hot work, and no-open-flame policy.	All Staff	Continuously.
	Ensure vehicles are spark-proofed and carry Class D fire extinguishers.	Transport Manager	Pre-trip inspection.
	Segregate Ammonium Nitrate (AN) storage from fuels and other incompatible materials.	Warehouse Manager	Continuously.
	Staff must be properly trained on how to react and handle AN fire.	Upon induction; annual refresher.	Upon induction; annual refresher.
7. Route & Driver Management	Pre-plan and risk-assess all routes, especially cross-border.	Transport Manager	For each new route/destination.
	Develop a Health and Safety Plan (Should be part of the induction).	HSE Officer / Management	During the course of operations.
	Confirm acceptable transport route with the Local Traffic Departments, and adhere to it.	Transport Manager/ Operations Manager	During the course of operations.
	Ensure drivers overnighting in Walvis Bay and other towns have proper facilities to do so.	Transport Manager/ Operations Manager	During the course of operations.
	Drivers to comply to local traffic rules.	Transport Manager/ Drivers	During the course of operations.
	Ensure drivers are endorsed to operate trucks and vehicles, with hazardous substances.	Transport Manager	During the course of operations.

EMP Component	Key Action / Control Measure	Responsibility	Frequency/Timing
	Ensure that road junctions have good sightlines.	Transport Manager	During the course of operations.
	Limit the type of vehicles to use the internal roads e.g. heavy trucks.	Transport Manager	During the course of operations.
	Implement traffic control measures where necessary.	Transport Manager	During the course of operations.
	In cooperation with the local authority, erect clear signage regarding restricted areas and roads, access and exit points to the port, speed limits, traffic rules, rail level crossings, etc.	Transport Manager/	During the course of operations.
	Trucks should not be allowed to obstruct any traffic or access points to any other businesses and facilities on the routes through Walvis Bay and other towns.	Transport Manager/ Drivers	During the course of operations.
	If any extraordinary traffic impacts are expected, traffic management should be performed in conjunction with the local traffic department.	Transport Manager/ Operations Manager	During the course of operations.
	Should hazardous cargo be transported in the port area, cognisance should be taken of Namport's operating procedures for Handling and Storage of Dangerous Cargo. This will involve planning of the route as well as arrangements with the Municipality and the Ministry of Safety and Security.	Transport Manager/ HSE Officer	Every loading/unloading event.
	Provide specialized driver training (safe handling, defensive driving, emergency response).	HSE Officer / Transport Manager	Upon induction; annual refresher.
	Enforce speed limits and regulated driving hours using telematics.	Transport Manager / Driver	Continuously.
	Provide Personal Protective Equipment for all staff		During the course of operations.
	Provide sufficient fire extinguishers and train staff on how to use them and the applications thereof.	HSE Officer / Transport Manager	Training upon induction; annual refresher. Ensure sufficient extinguishers during the course of operations.
	Only qualified personnel must be allowed to operate special machines/instruments.	HSE Officer / Operations Manager	Continuously.
	All vehicles must be switched off when not operational.	Drivers	During the course of operations.

EMP Component	Key Action / Control Measure	Responsibility	Frequency/Timing
	Ensure availability of a first aid kit.	HSE Officer	During the course of operations.
	Adequate safety signs must be displayed on vehicles and equipment	Operations Manager	Continuously.
	Staff must be trained in the use of first aid.	HSE Officer	Continuously.
	Report any incidents immediately.	HSE Officer / Operations Manager/ Transport Manager/ Drivers	During the course of operations.
	Any complaints received regarding dust or emissions along the transport routes and sites of handling of cargo must be recorded, investigated and the problem rectified. Any incidents must be recorded with action taken to prevent future occurrences.	HSE Officer / Operations Manager/ Transport Manager	During the course of operations. Immediate reporting.
	A report should be compiled every 6 months of all incidents reported and monitoring performed. The report should contain dates when safety equipment and structures were inspected and maintained.	Operations Manager/ Transport Manager	Bi-annually.
	Limit movement and number of vehicles and adhere to off road speed limit.	Transport Manager	During the course of operations.
	A wellness program should be initiated to raise awareness on health issues, especially the impact of sexually transmitted diseases and Covid-19.	HSE Officer / Operations Manager	During the course of operations.
	Provide access to free condoms for the workforce.	HSE Officer / Operations Manager	Continuously.
	Facilitate access to antiretroviral medication for personnel.	HSE Officer / Operations Manager	Continuously.
	Conform to the stipulated protocols related to Covid-19.	HSE Officer / Operations Manager	As they become applicable.
8. Emergency Preparedness	Develop and maintain a site-specific Emergency Response Plan.	HSE Officer	Annual review and update.
	Conduct emergency drill (e.g., spill simulation).	HSE Officer	Bi-annually.
	Ensure all drivers carry Tremcards, MSDS, and emergency contact lists.	Transport Manager / Driver	Before every journey.

EMP Component	Key Action / Control Measure	Responsibility	Frequency/Timing
	Establish a fund to make provision for the remediation of any environmental damage caused by project activities.	Management	Annual provision.
9. Waste Management	Collect and label all spill-contaminated materials as hazardous waste.	Operations Manager / Driver	As incidents occur.
	Contract licensed waste disposal company for treatment/ disposal.	Management	As needed, under contract.
	Control and properly dispose of vehicle washdown water.	Operations Manager	After each washdown event.
	Implement a comprehensive waste management plan based on the waste hierarchy for all site-generated waste.	HSE Officer/ Management	At the start of operations. To be implemented continuously.
	Conduct training and toolbox talks to emphasize the importance of proper waste management.	HSE Officer	At least quarterly.
	Store solid waste in a designated area using covered, tip-proof metal drums or skips.	HSE Officer	Continuously.
	Arrange for collection and disposal at an approved waste management facility.	HSE Officer	Continuously.
	Return reusable packaging (e.g., empty bags) to facilities whenever possible.	HSE Officer	During the course of operations.
	Refer to Material Safety Data Sheets (MSDS) from suppliers for guidance on disposing of contaminated products and empty containers.	HSE Officer	During the course of operations.
	Liaise with the local municipality regarding procedures for handling and disposing of hazardous waste.	HSE Officer/ Operations Manager	During the course of operations.
	Recognize that hydrocarbon and chemical contaminated solids can pollute soil, groundwater, and surface water. Ensure the use of correct storage and disposal methods for these hazardous materials.	HSE Officer/ Operations Manager	During the course of operations.
10. Noise	Minimize or prevent noise producing activities and plan to restrict these to daytime as far as practically possible.	HSE Officer/ Operations Manager	During the course of operations.

EMP Component	Key Action / Control Measure	Responsibility	Frequency/Timing
	All machinery must be regularly serviced to ensure minimal noise production.	Transport Manager	Respective service intervals.
11. Social	The proponent must employ local Namibians where possible.	Management	During the course of operations.
	If the skills exist locally, employees must first be sourced from the town, then the region and then nationally.	Management	During the course of operations.
	Deviations from this practice must be justified.	Management	During the course of operations.
	Local businesses and industries should be supported.	Management	During the course of operations.
12. Monitoring & Auditing	Audit loading/unloading procedures and driver logbooks.	Transport Manager / HSE Officer	Bi-annually.
	Inspect storage facilities for compliance (cleanliness, segregation, signage).	Warehouse Manager / HSE Officer	Monthly.
	Review and analyze all incidents for root cause and corrective actions.	HSE Officer / Management	Immediately after each incident.
13. Training & Awareness	Conduct environmental induction for all new employees.	HSE Officer	Upon induction.
	Hold toolbox talks on specific environmental topics (e.g., water protection).	HSE Officer / Transport Manager	Quarterly.
14. Documentation & Review	Maintain all records (training, inspections, incidents, audits).	HSE Officer	Continuously; archive annually.
	Formally review and update the entire EMP.	HSE Officer / Management	Annually, or after major incidents.

8. CONTINGENCY PLAN

In addressing the environmental risks of the transportation of ammonium nitrate (AN), primarily stemming from its dual identity as a valuable fertilizer and a potent oxidizing agent, as well as other dangerous goods, the proponent has developed a contingency plan. This plan is attached as Appendix A. A specific route assessment survey is also attached as Appendix B.

9. CONCLUSIONS AND RECOMMENDATIONS

Conclusion:

The application for the Environmental Clearance Certificate (ECC) for the transportation of ammonium nitrate and other dangerous goods has been thoroughly assessed. While the inherent properties of ammonium nitrate present potential environmental risks, including contamination from spills, eutrophication of water bodies, and severe impacts in the unlikely event of a fire or detonation, the proposed risk management and mitigation measures are robust and align with international and national best practices.

The proponent has demonstrated a clear understanding of the hazards and has committed to a comprehensive framework that includes:

- Strict adherence to local and international transport regulations for Oxidizing Substances.
- Implementation of engineered controls and detailed procedures for loading, transport, and emergency response.
- A commitment to continuous monitoring, training, and community awareness.

It is concluded that with the strict implementation of these mitigation measures, the environmental impacts can be reduced to acceptable levels, and the transportation activities can be conducted in a manner that is environmentally sound and protective of public health.

Recommendation:

It is recommended that the application for the Environmental Clearance Certificate be approved, subject to the following stringent conditions:

- *Route Specification and Management*: The transportation shall be restricted to a pre-approved route, avoiding high-risk and sensitive areas (e.g., dense residential zones, major water bodies, and protected ecosystems) as far as practicable. Real-time vehicle tracking must be implemented and maintained.

- *Adherence to Safety Protocols*: The proponent must strictly comply with all aspects of the submitted Transportation Safety Plan and Contingency Plan. This includes using certified packaging, ensuring vehicle segregation from combustibles, and providing regular, documented driver training.

- *Emergency Response Coordination*: Proof of coordination with local fire, police, and medical emergency services along the designated route must be provided. Annual mock drills must be conducted to ensure readiness.

- *Spill Prevention and Control*: The proponent must maintain spill kits on all transport vehicles and at loading/unloading facilities. Procedures for the immediate containment and clean-up of any spill must be rigorously enforced to prevent environmental ingress.

- *Monitoring and Reporting*: An bi-annual audit report must be submitted to the authority, detailing all transport activities, any incidents (no matter how minor), and the status of all mitigation measures. This ensures ongoing compliance and allows for adaptive management.

This approval should be granted on the condition that the proponent remains in full compliance with all stipulated measures.

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11. APPENDIX A - CONTINGENCY PLAN

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EMERGENCY RESPONSE PLAN

Purpose

To ensure that Safety, Health, Environmental and other potential emergencies are identified and emergency plans developed and implemented which would minimize the occurrence and impact of injuries and losses during an emergency through effective management, transfer of information and mitigation of an incident.

Responsible for Implementation SHEs OFFICER
References

- Incident / Accident Investigation

Identification of Emergencies

- Risk assessments will be carried out for all of the required or specified Health and safety risks and will be documented in the site risk assessment methodology.

Development of Emergency Response Plan

- This Emergency Response Plan has been drawn up for key emergency scenario that has been identified, in consultation with the management of the relevant area.
- Staff for emergency response teams identified and receive relevant training in order that they may effectively and safely carry out instructions contained within the emergency response plan.
- Emergency equipment will be identified provided for and made available as required by the plans.
- The Emergency Response Plan will be tested according to legal requirements by means of fire / emergency drills at least on an annual basis taking into account that these drills shall be performed to cater for Truck Drivers schedules.
- These drills will be documented including date, time conducted, type of emergency scenario, and any irregularities noticed during the drill.
- A competent person or persons will test emergency equipment.

Review of Emergency Plan

- Emergency Plan will be reviewed on an annual basis and any changes documented accordingly.
- Specific sections of the Emergency Plan will be reviewed after an emergency incident, near miss incident, criminal or any attack.
- A written report will be documented after emergency events occur to analyze causes and indicate required changes or improvement to the system.

Rehabilitation of the Environment

- Where damage to the environment occurs as a result of an emergency incident, appropriate minimization and rehabilitation measures will be undertaken to ensure the effects of the damage are mitigated and the environment is returned to its original condition.
- All rehabilitation will be carried out according to the requirements of the relevant authorities.
- Any environmental damage shall be reported to the relevant government authority.

Management of Major Spills

In the event of an accident /incident and there is spillage, A and B Logistics will contact **Pitbull Hazmat Spill Response Team**, a company registered and accredited by the Namibian authorities to carry out remediation and cleaning services.

- In the event of any product spillage, Pitbull will do remediation –ie restoring the site to its former condition as it was before the incident.
- In case of any rollovers of vehicles, Pitbull will do all recovery operations.
- Upon completion of the cleaning exercise, Pitbull shall submit an application of clearance to the relevant authorities.

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FIRE

General Preventative Guidelines

- Fire teams appointed and trained in basic firefighting skills use of firefighting equipment, fire prevention, fire extinguishment and evacuation procedures.
- Specific personnel trained in basic first aid in each area according to legal requirements. Sufficient First Aid trained staff available at any time to deal with an emergency.
- Refer to following checklist for evacuation preparedness.

Fire Emergency Procedure

- Notify the Manager to co-ordinate the emergency with the SHEs Officer, the internal fire marshals and external emergency services.

The SHEQ Manager / Officer:

* Notify the Local Municipality Fire and Rescue Brigade of the incident and request assistance if necessary. This will include provision of necessary details such as extent of the fire, threatened areas as well as in the immediate vicinity.
  - Direct the fire crew who will prevent the fire from spreading or attempt to extinguish the fire should it be within their level of competence and capability.
  - Shut down procedure, in the event of the need for a full evacuation the most senior person at the time of the incident will initiate this procedure.
  - Only key person(s) will remain to clear area and all other employees will be evacuated to the designated assemble points.
  - First aid stations established and trained personnel to render first aid to injured workers if necessary.
  - Notify neighboring premises of the fire.
  - Notify relevant authorities.

Personnel responsibilities.

Responsibilities of Senior Management

- Assess the situation and take the appropriate action i.e., evacuation / partial evacuation.
- Direct emergency teams to initiate the rescue of persons from the threatened areas if necessary.
- Advise all HSE representatives ***I*** fire marshal of the nature and extent of the emergency, which areas need to be evacuated and safest escape routes.
- Arrange for additional service of outside assistance when required.
- Issue clear instructions to the emergency teams to effectively control the emergency prior to the arrival of the emergency services.

Responsibilities of HSE Manager / Officer

- Notify the GM Ops and proceed to the emergency team assembly point to direct operations.
- Ensure that the fire alarm has been sounded / raised and that instructions are given to the firefighting teams. Ensure that instructions are being implemented.
- Provide assistance with the evacuation of personnel to designated assembly points.
- Ensure Security staff are at the main gate to escort emergency vehicles to the scene.
- No vehicles or pedestrians may enter or leave the site unless directed by management or the emergency services.
- Laisses with outside services (Fire Department, Ambulance Services)
- Direct all press representatives, relatives or anyone requiring information to the MD at the Head Office.

Sound the all-clear when instructed to do so by the relevant emergency personnel or the situation is back to normal.

- Provide senior management with details of the emergency and casualties.

Guidelines for Safety Representatives *I* Fire Marshalls

- Direct personnel not required for essential duties to the relevant fire exits and assembly points outside. **Take extra care to assist disabled staff.**

- Proceed to the emergency response team assembly point and await instructions from the relevant Manager.
- Carry out first aid / fire-fighting instructions from the SHE Manager / Officer.
- Ensure that all windows and doors are closed and that all electricity **other than lighting and essential process machinery** is turned off, where safe to do so.
- Ensure that air-conditioning and ventilation is switched off.
- Account for and locate any missing personnel by means of a roll call at the assembly points.
- Inform the HSES Manager /Officer of developments or changes in the fire situation.
- Request assistance required through the HSES Manager /Officer staff member coordinating the emergency response.
- Hand over firefighting duties to the fire department on their arrival and give information to the senior fire officer as to where possible damage or spread of fire will occur and render assistance to the emergency services as required.

SPILLS

General Preventative Guidelines

- Obtain material safety data sheets from suppliers or internal material safety data sheet data base. Copies will be available in the master and section files where applicable.
- Ensure availability of suitable and sufficient spill control equipment (brooms, clean dry containers, plastic shovels) and suitable personal protective clothing to deal with accidental spillages. Protective clothing shall comply with the manufacturer's specifications for handling individual substances.
- Emergency teams shall be trained in the hazards associated with dangerous goods and dealing with uncontrolled releases or spillages. The emergency team members shall be familiar with the use of absorbent materials and spill control equipment present on site.
- Ensure each site has Material Safety Data Sheets (MSDS) displayed or easily accessible for all Dangerous Goods used or stored in that area. Hard copies kept at the Clinic and Security main office.
- Ensure chemical storage areas are branded in accordance with the legal requirements. Segregation of incompatible chemical substances shall be taken into account when storing chemicals substances.
- The spillage, collection and disposal procedure outline the actions to be taken.

INFORMATION MANAGEMENT CRISIS

- List, keeping the caller talking as much as possible by asking questions from the **Bomb Threat Check List.**

A co-worker should then immediately notify Security

- Notify your manager immediately after which an evacuation must take place.
- Security and emergency response teams will initiate an evacuation of the premises and congregate at the assembly point.
- Supervisors are then to take a roll call to check that everyone is present. They must then report to their manager.
- Assist the NAMPOLICE by remembering every detail of the phone call.

Working at Height

- ❖ There are several risks associated with doing work at height, all of this work can only be conducted if all of the relevant procedures have been followed, this includes HIRA's, Pre-task risk assessments, a permit has been issued by a competent person.
- ❖ Where possible an extra safety measure of a safety net has been put in place together with a safety lifeline. Should an incident occur where a person falls and is left hanging from a safety lanyard

INJURY TO PERSONNEL

In the event of a serious injury (e.g., amputation), fatality and or vehicle accident, the procedure is as follows:

* Contact the first aider / SHEs Manager immediately

Do not enter the scene of the accident if there is any danger to yourself or your fellow workers.

- ■ Ensure that first aiders are informed to provide first aid to the injured workers and ensure that the emergency services are informed if required. If there is any doubt, please notify the relevant emergency services
- ■ Evacuate workers to a safer location if they are endangered.
- ■ Do not disturb the scene of the accident without permission from the relevant Manager.

Responsibilities of Senior Management

- Proceed to the scene of the accident.
- Arrange first aid treatment for casualties.
- Notify the relevant Manager.
- Ensure that casualties are removed and taken to the hospital.
- Establish the cause of the accident, record all relevant details, and provide senior management with details of the emergency and casualties.
- In conjunction with the HSE, Manager/ Officer will submit reports in terms of the Namibia OHS ACT after the incident and advise senior Management.
- Record details of all casualties.
- Information must be given to the next of kin through the HR or responsible.
- Names of casualties may not be released to any source until the next of kin has been notified.

Responsibilities of HSE Manager/ Officer

- Notify Relevant Authority
- Summon an ambulance if required.

Inform the Hospital of the numbers of casualties and other relevant information (office

- hours).
- The HSES Officer will notify Management on seriousness of incident.
- In the event of a fatality the HSE Manager or HSE Officer, Fire Officer is to ensure that the NAMPOLICE are notified, and that the scene is not disturbed where possible.

Guidelines for HSE Safety Representatives *I* Fire Wardens.

- Proceed to the scene of the incident.
- Eliminate any consequential dangers as far as possible (if safe to do so).
- Establish as many facts about the incident as possible.
- Notify the HSE Manager and or relevant Manager of any danger to be eliminated.
- Advise relevant Manager / HSES Manager of the cause of the accident and any photographs that need to be taken.
- In the event of a fatal accident, care must be taken not to disturb any objects involved before the arrival of the inspector. Objects may only be moved to prevent any further accident or to rescue persons from danger.

HEALTH AND DISEASE OUTBREAK

- Annual medical test done to all staff to identify any health / potential health and disease outbreaks, which may affect the business / community.
- OSH Health Risk assessment to be in place and relevant.
- Once the outbreak / potential outbreak has been identified, it is communicated to the HSE Manager/ Officer, who will inform the General Manager Operations.
- The General Manager Operations, in consultation with the Medical Services, will make a decision and formulate an action plan to prevent the spreading of the disease.

INCIDENT REPORTING

All incidents shall be reported as per the standard set by the Company incident reporting procedure.

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Below is a list of phone numbers, In case of an emergency

EMERGENCY SERVICES	
WALVIS BAY	
POLICE SERVICE	064 – 219 000
PRIVATE HOSPITAL	064 – 218 911
STATE HOSPITAL	064 – 216 300
AMBULANCE SERVICES	081 707 / 081 922
FIRE DEPARTMENT	081 922 / 081 122 0833
PITBALL HAZMAT RESPONSE TEAM	081 600 6000

HAZMAT OFFICIAL – WALVIS BAY MUNICIPALITY

NAME	DESIGNATION	TELEPHONE NO.	CELL PHONE NO.
RIAAN ARCHER	HAZMAT OFFICER	064 – 201 3376	081 129 5017

SWAKOPMUND

POLICE SERVICE	064 – 402 431
PRIVATE HOSPITAL	064 – 412 200
STATE HOSPITAL	064 – 410 6000
AMBULANCE SERVICES	081 924 / 081 922
FIRE DEPARTMENT	081 922 / 081 122 4653
TRAFFIC DEPARTMENT	081 122 4679

A&B MANAGEMENT

NAME	DESIGNATION	CONTACT NO.
BRIAN HWALIMA	MANAGING DIRECTOR	+260 977 846 535
RAUL DE JESUS FRANCISCO	ACCOUTABILITY AGENT	+264 81 205 0472
FRANK NYIRENDA	SAFETY & SECURITY	+260 953 510 470

12. APPENDIX B - SPECIFIC ROUTE ASSESSMENT SURVEY

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ROUTE RISK ASSESSMENT

DATE: **11th November 2025.**

FROM: **WALVIS BAY PORT - NAMIBIA**

TO: **KANSANSHI MINE - ZAMBIA**

DESCRIPTION:
This report outlines findings of a route assessment carried out by A&B Logistics (Pty) Limited from Walvis Bay Port in Namibia to Kansanshi Mine in Solwezi Zambia.This assessment will bring in control to reduce risks associated with the route and the load.

TRIP DURATION: 6 Days.

TOTAL DISTANCE: APPROXIMATELY 2,760 KM

HARZARDS INCLUDE : HEAVY TRAFFIC, PEDESTRIANS, ROAD CONSTRUCTION MACHINERY& WORKERS, VENDORS, OVERHEAD POWER LINES, ANIMALS, THIEVES, NARROW BRIDGES, RAIL CROSSINGS, WIND GUSTS AND SAND.

The following must be observed at all times during this journey.

a. Truck speed general speed limit is 80 km/h. Variable speed limits at selected points are in place
b. The road is under construction in some parts of Namibia and Zambia.
c. There is heavy traffic high presence of pedestrians throughout the route.
d. Roadside markets and small settlements along the way where spotted.
e. Drivers MUST BE EXTRA careful and observe speed limits.
f. Never drive or try to park the vehicle far off the road because there is too much sand which can make the vehicle stuck.
g. Maximum speed 80km/h

1. **TRANSIT TOWNS**

WALVIS BAY PORT TO USAKOS

From Walvis Bay Town there is a new road that is being constructed all the way through Dune 7 Bridge.The place is very windy, sandy and dusty, drivers need to be very careful because vision is compromised especially when there is too much wind. **Arandis** town is situated 94 kilometers from Walvis Bay and from Arandis to Usakos is about 90 kilometers.

Map from Walvis Bay to Usakos

Picture showing Walvis Bay

Walvis Bay CBD

Conctruction vehicles along the road from Walvis Bay CBD

A new road under construction

Picture showing No Off-Road driving

The Dune 7 Bridge under construction

USAKOS TO OTAVI

The road has a lot of curves with narrow bridges.It is on this same stretch where **Omaruru, Karibib, Kalkfeld,** and **Otjiwarongo** are found**.** In Kalkfeld there is a truck park and a place where drivers can freshen up. The road is smooth mainly with ascents and descents as the place is mountainous. As you leave Omaruru, there is a fly over bridge with a speed limit of 70km/h. The road is being made into a dual carriage way therefore there is heavy presence of road construction vehicles. As you leave Usakos, the road is very steep and sand traps have been put in place for vehicles that may lose control. The road meanders all the way to Otavi with very steep slopes. The distance from Usakos to Otavi is about 352 kilometers with a drive time of close to four hours.

Picture showing rocks falling as road cuts between a mountain.

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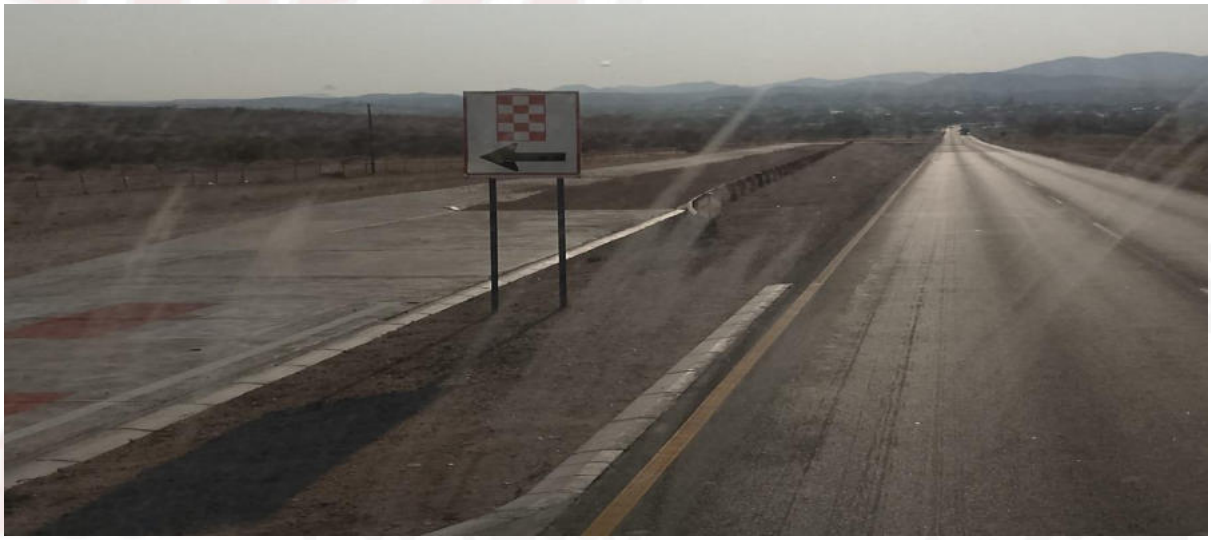
Picture showing sand trap road as you get into Usakos.



OTAVI TO RUNDU

The raod network from Otavi is good with steep slopes especially around the junction after joining the B8. There are animals grazing along the road and overhead power lines in some points along the road. From Otavi you get to **Grootfontein** which is 97 kilometers then there is **Mururani** and finally **Rundu** .The distance between Otavi and Rundu is 319 kilometers.

Otavi to Rundu 319 Kilometers

Picture showing the welcoming sign post, and the terrain of the road as you get into Otavi town.

Picture showing road with pothole patches and potholes in Rundu

RUNDU TO KONGOLA

The road has curves/bends with pothole patches. Animals and their herders are also present along the B8 from Rundu to **Divundu** which is 200 kilometers from Rundu CBD. The speed limit signs range from 80 km/h to 120 km/h with 90 km/h around school areas. The road has lay-bys which are safe places to take rests from as the driver has his/hers interval breaks. There is a truck park in Divundu which is safe to park especially if the driver cannot proceed with their journey. It is aproximatly 23 kilometers from Divundu CBD to Bwabwata National Park. The longest stretch is in the game park which is about 180 kilometers. All laybys are closed and drivers are not allowed to stop or park anywhere in the game park. There are about 4 different settlements within the game park, Cheto,Omega 1, Omega 2 and Omega 3. The speed limit ranges from 60km/h to 120km/h.

A truck stuck in the sand besides the road along the B8 between Rundu and Divundu

Picture showing a cow hit by a truck in Rundu

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Donkeys grazing along the road.

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Bwabwata National Park


Pothole Patching along the B8 road as you head to Kongola

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KONGOLA TO KATIMA MULILO BORDER

The road from Kongola to Katima Mulilo has a lot of Pothole patches. There are settlements along the road, pedestrians, animals and overhead powerlines in some places. From Kongola laybys are open to motorists because there are no dangerous wild animals around this area. Drivers have to be on the look out still as some places are infested with elephants.

Picture warning motorist of potholes.


Picture showing settlement and pedestrians

Picture showing a nearby hospital

Picture showing a black spot along the road as you head to Katima Mulilo

Road sign showing junction as you head to Wenela border in Katima Mulilo

Trucks packed awaiting clearance to cross to Zambian side.

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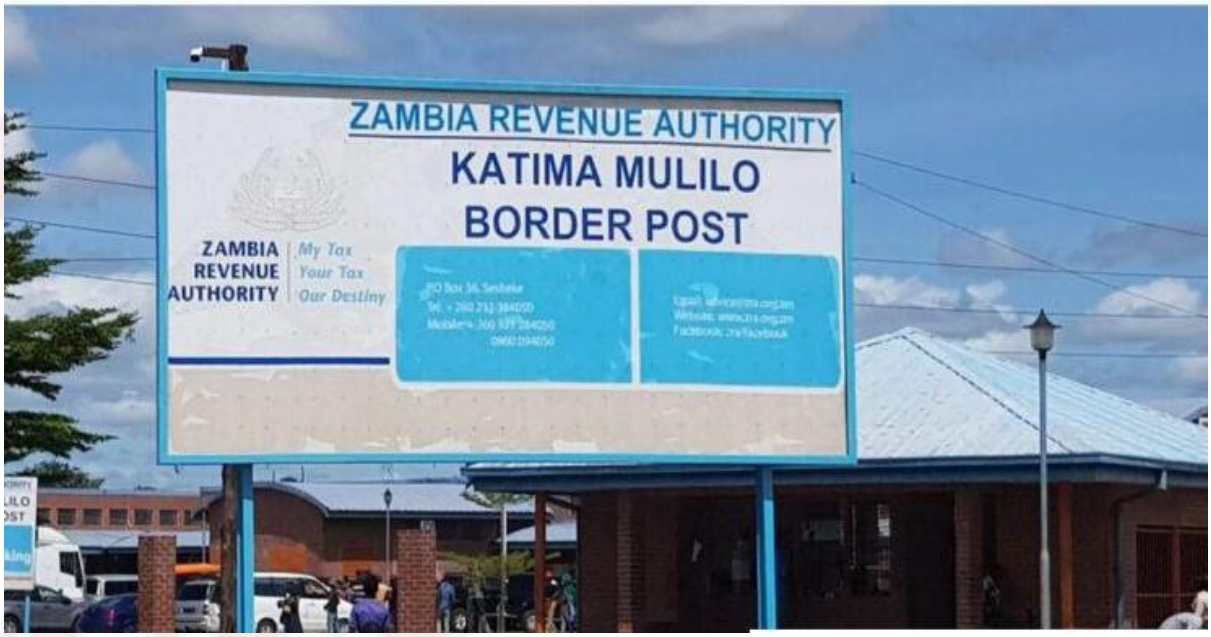
Long que of trucks awaiting clearance to cross over to the zambian side.



Katima Mulilo Border Zambia Side

KATIMA MULILO BORDER

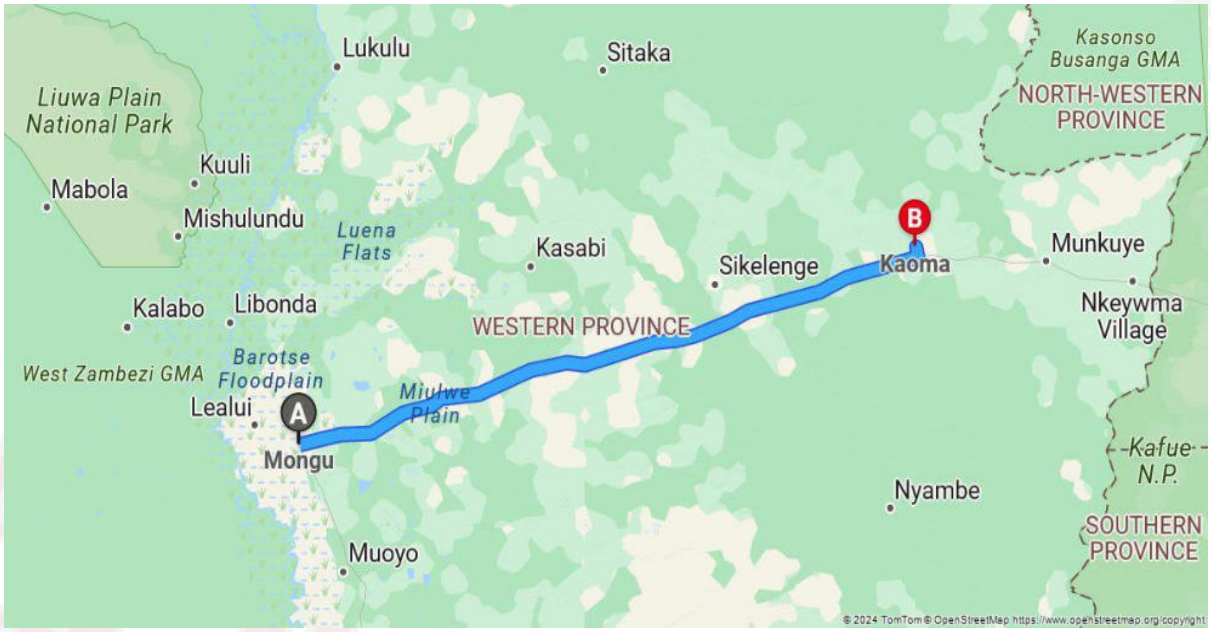
There is heavy congestion both on Namibia and Zambian borders and there is not enough space to park. After being cleared by customs on both sides, trucks are ready to embark on the journey to Sesheke. The road is good with speed limit signs along the way.

SESHEKE TO MONGU

From the border the road is okay but it is narrow and congested especially with oncoming traffic. There are pedestrians, animals and settlements are close to the road. There is a town called **Sioma** which 134 kilometers from Sesheke. In Sioma there is heavy oncoming traffic and the road has potholes for about a few kilometers. The distance from Sesheke to Mongu is 332 kilometers.

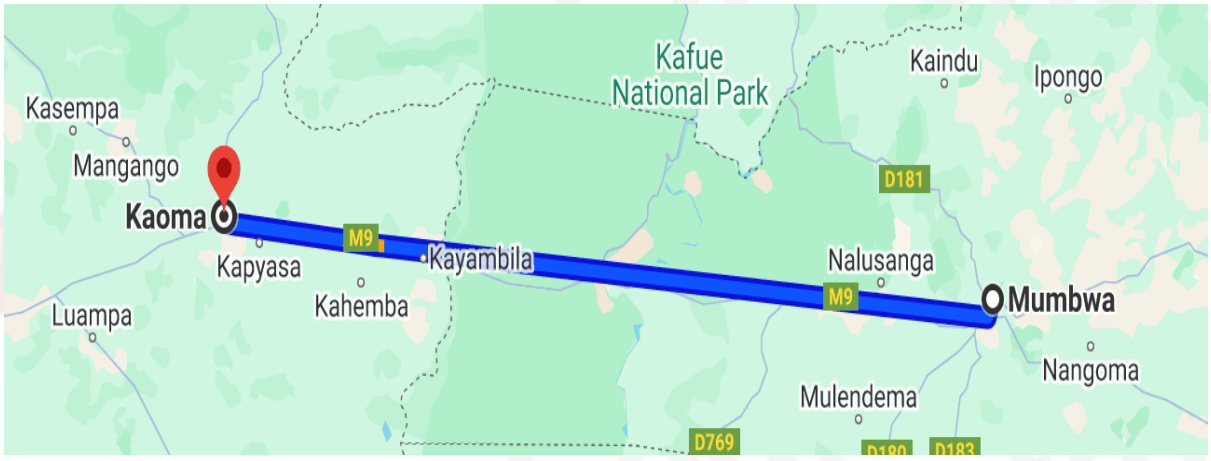
MONGU TO KAOMA

The road network is good but has heavy traffic and there is presence of animals (cattle) seen grazing around. Drivers ought to watch out for pedestrians as the villages are close to the road. The distance between Mongu to Kaoma is 195 kilometers.



KAOMA TO MUMBWA

The distance between **Kaoma** and **Mumbwa** is approximately **245 kilometers**. On this stretch lies Nkeyema and Lukulu districts. The road has potholes from Nkeyema to Lukulu turn-off. From Lukulu turn-off, the road is in a good condition and it is flat as you drive on. Presence of pedestrians Kaoma CBD to game park entrance, speed humps in the park and the road is narrow from the park to Mumbwa.



MUMBWA TO KABWE

The distance from Mumbwa to kabwe is 184 kilometers. The road from Mumbwa to Lusaka is good but from Lusaka to Kabwe is under construction. There is too much traffic as well as pedestrians along this stretch especially around settlement areas.

Ndola-Lusaka dual carriadge way under construction

KABWE TO NDOLA

Kapiri Mposhi is kilometers from Kabwe and 117 Kilometers from Ndola. The great north road merges with the Ndola/Lusaka road in Kapiri Mposhi near the weighbridge making traffic to be heavy around this area. The road is tarred but uneven with waves almost becoming ridges. There are two tollgates on this stretch namely Kafulafuta and Manyumbi. The Ndola-Lusaka dual carriage way is under construction and the speed limit ranges from 20km/h to 60km/h. There is Mulungushi University as you leave Kabwe CBD, which is a high-risk accident zone. The flow of traffic is slow due to road construction works. The road has pothole patches and ridges on which can make the vehicle to lose control if the driver is not steady.

Mulungushi University along Kabwe road,a high accident zone

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Picture showing flow of traffic and pedestrians in Kapiri Mposhi CBD


Ndola teaching hospital along Kabwe road

Picture showing training center for people living with disability along Ndola-kitwe dual carriadgeway

NDOLA TO KITWE

From Hospital round about in Ndola, the road is good all the way to Kitwe. There is trading place called Baluba 10 kilometers from Michael Chilufya Sata Toll Plaza, which has many pedestrians and too much traffic. A few kilometers after the under bridge as you approach Kitwe CBD, there is a road that diverts heavy-duty vehicles to avoid the central business district. This same diversion leads into Kalulushi road where trucks will eventually join Kitwe – Chingola dual carriageway after passing Kalulushi-Sabina Toll Plaza. There is rampant stealing of goods along Central Street and Mindolo roads.

Picture showing Baluba Area with presence Pedestrians,Traffic and Vendors along Ndola – Kitwe road.

Overhead power lines at Maposa Area

KITWE TO CHINGOLA

The distance from Kitwe to Chingola is about 55 kilometers and the road is in very good condition. There is a Mwembeshi Bridge and a police checkpoint at Sabina immediately after joining the dual carriageway from Kalulushi.

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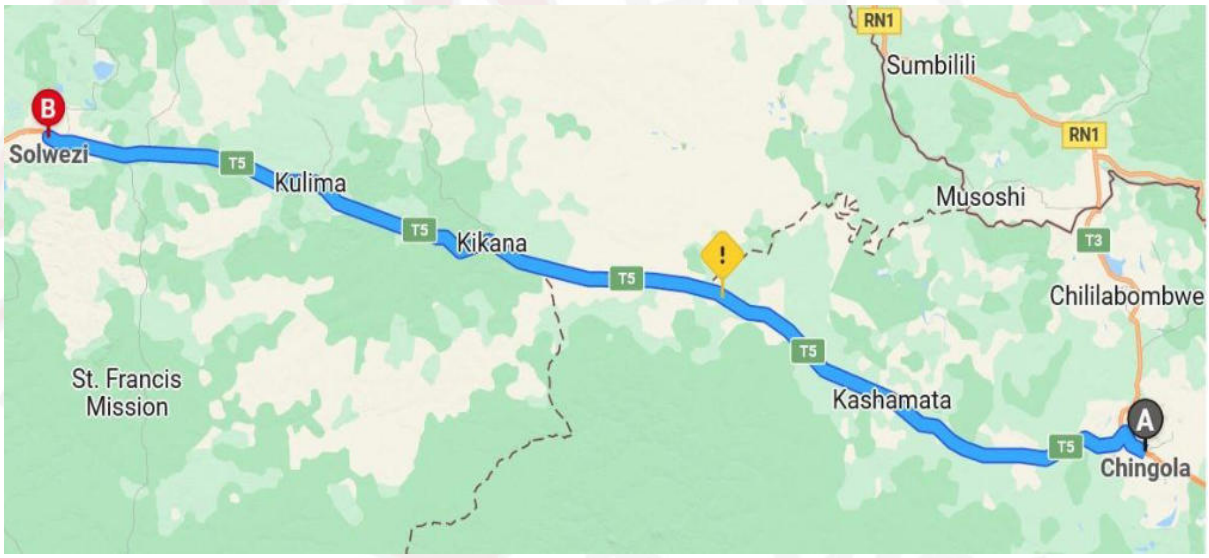
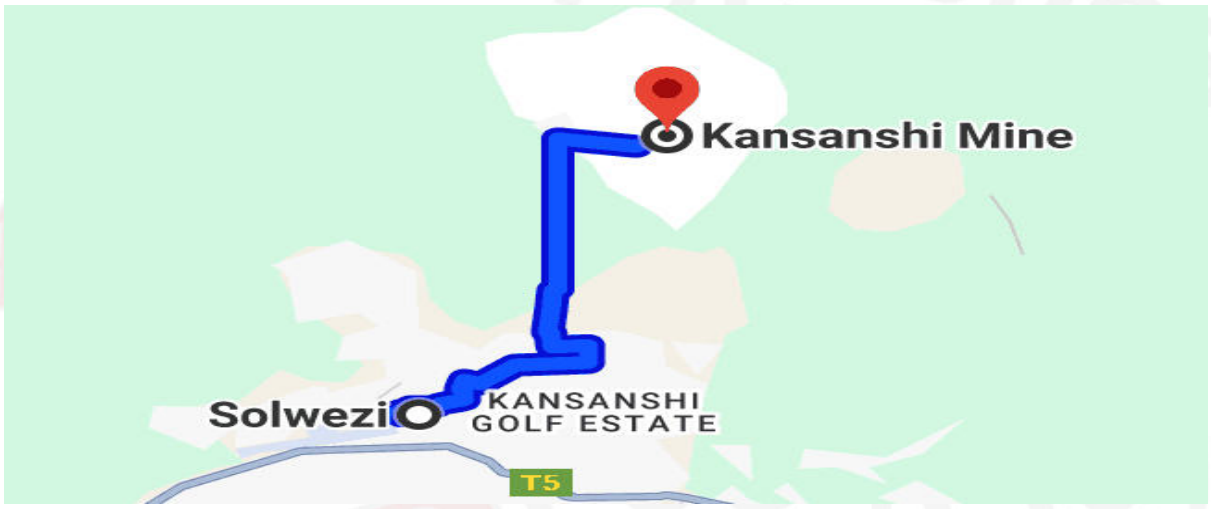
Picture showing Rail crossing and vendors as you get into Chingola

Fly over bridge with height limit of 4.8 metres as you leave Chingola

CHINGOLA TO SOLWEZI

This stretch is approximately 174 kilometers with a recently tarmac resurfaced road. Motor vehicle traffic is not very high but there is a high presence of pedestrians and cyclists as well as lots of roadside markets and vending. Drivers are instructed to be on high alert for hazards that may develop from various roadside activities and must adhere to variable speed limits on the route. The distance from Solwezi CBD to Kansanshi Mine is approximately 15 kilometers, the road is tarred and in a good condition.





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SAFETY RECOMMENDATIONS

1. NO NIGHT DRIVING.
2. Drivers need to park at a secured place overnight, preferably at a police station or in a secured truck park, as crime is rampant in some places.
3. Drivers need to reduce speed when driving, especially when passing through school areas and villages where high pedestrian presence is prevalent.
4. Drivers should not park under overhead power lines
5. Drivers to take breaking intervals and check the vehicles (truck and trailer).

Our number one priority is to ensure that our drivers are equipped with the necessary skills to execute their duties to perfection and in a safe environment. We always endeavor to provide risk free quality service with a well-maintained fleet of vehicles whose replacement cycle is 4 years regardless of condition.

"No job is so important that it cannot wait to be done in a safe way."