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2025

ENVIRONMENTAL MANAGEMENT PLAN - for Transportation of Cargo and Hazardous Goods for A Van Der Walt Transport (Namibia) (Pty) Ltd in Namibia

ECT
ENVIRONAM CONSULTANTS TRADING

ENVIRONMENTAL MANAGEMENT PLAN

TRANSPORTATION OF CARGO AND HAZARDOUS GOODS FOR A VAN DER WALT TRANSPORT (NAMIBIA) (PTY) LTD IN NAMIBIA

PROJECT DETAILS

PROPONENT:

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Date

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 van der Walt Transport (Namibia) (Pty) Ltd is a leading and trusted name in the Namibian transport and logistics industry. The business was founded in 1986 with its main purpose to distribute refrigerated, containerized and break-bulk cargo throughout the SADC region.
Since then, it has remained focused on the core business which is the cross-border transportation of goods in and between Walvis Bay and many destinations in neighbouring countries.

Over the years the company has established itself as a reputable and reliable entity in the transport market that has offered an exceptional service to its customers without failure in all their cross-border transport needs. The personnel corps of the company is all Namibian and are experienced, service orientated and equipped for the various tasks required of international transport.

The company operates a fleet of approximately 50 trucks and 60 trailer units consisting of a combination of superlinks, triaxles, reefers and skeletons. The company ferries various cargo such as Ammonium Nitrate. Other typical cargo transported by van der Walt includes:

- Mining reagents
- Frozen fish
- Fertiliser
- Sulphur
- Copper/zinc/nickel – in all forms
- Containers – various cargoes

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 (See Figure 1 below).
- 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).

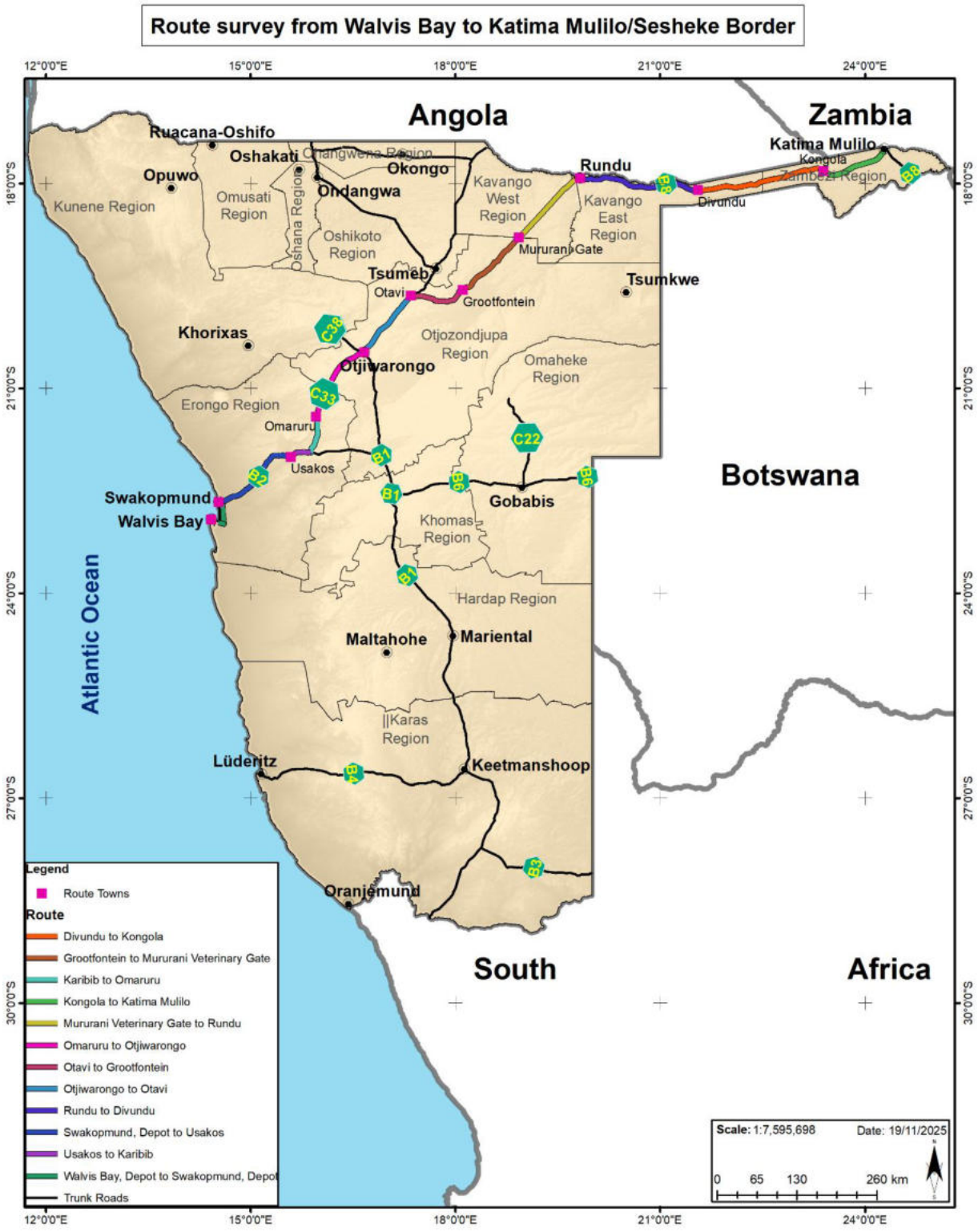

Figure 1: Route from Walvis Bay to Katima Mulilo border

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 van der Walt Transport (Namibia) (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.

EMP Component	Key Action / Control Measure	Responsibility	Frequency/Timing
	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.
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	Maintenance Manager	Respective service intervals and during the course of operations.

EMP Component	Key Action / Control Measure	Responsibility	Frequency/Timing
	with the servicing frequency of the specific machinery), in order to prevent leakages and emissions		
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.
	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	HSE Officer/ Operations Manager	Continuously.

EMP Component	Key Action / Control Measure	Responsibility	Frequency/Timing
	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.		
	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.

EMP Component	Key Action / Control Measure	Responsibility	Frequency/Timing
	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.
	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.

EMP Component	Key Action / Control Measure	Responsibility	Frequency/Timing
	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.
	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.

EMP Component	Key Action / Control Measure	Responsibility	Frequency/Timing
	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.

EMP Component	Key Action / Control Measure	Responsibility	Frequency/Timing
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.
	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.

EMP Component	Key Action / Control Measure	Responsibility	Frequency/Timing
	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.
	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.

EMP Component	Key Action / Control Measure	Responsibility	Frequency/Timing
	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:** A 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

VAN DER WALT TRANSPORT (NAMIBIA) (PTY) LTD

HEALTH AND SAFETY

EMERGENCY MANAGEMENT PLAN

Compiled by	Approved by	Reviewed by
Brendan Smit	Neill Thompson	
Group HSE Manager	General Manager	
		

Contents

1. INDUCTION

This emergency programme has been prepared to describe the emergency controls and processes that has been developed to control and mitigate the consequences of any site-specific emergency conditions for A Van der Walt Transport (Namibia) (Pty) Ltd (hereafter referred to as "**AVDWT**").

The contingency plan will be structured around three major objectives:

- Understanding the type and extent of a potential emergency;
- Establishing a high order of preparedness; and
- Ensuring an orderly and timely decision-making and response process.

1.1. Objective

2. THE OBJECT OF THE EMERGENCY RESPONSE PLAN IS TO:

Assist personnel in determining appropriate responses to emergency situations; and provide personnel with an established procedure to minimise the consequences of environment incidents.

3. STANDARDS

- HSE Emergency System,
- Emergency Coordination,
- Drills and exercises,
- Emergency equipment and Inspection.

4. DEFINITIONS, ACRONYMS, EXPLANATIONS AND ABBREVIATIONS

4.1. Acronyms

EC	Emergency Co-ordinator
EMP	Environmental Management Plan
ERP	Emergency Response Procedure
ERT	Emergency Response Team
PPE	Personal Protection Equipment
SO	Safety Officer

4.2. Definitions and Explanations

Emergency by Definition

An emergency by its very definition is an unpredictable and unforeseen event. For this plan an emergency will be a situation which cannot be dealt with locally, at a work site, and which requires some immediate external support and assistance to be mobilised.

Major emergencies are those involving serious injury to or the fatality of personnel, significant contamination of the environment and severe damage to equipment.

Emergency Incident Types

- Fire – chemical or bush;
- Explosion – involving flammable substances, electrical apparatus;
- Fatal or severe injury in the course of work;
- Security breach resulting in person held captive or hostage;
- Spillage of hazardous materials;
- Transport incidents;
- Social/political unrest;
- Animal/Reptile bites and stings;
- Flash flooding;
- Medical health issues – heart attack, diabetic coma, epileptic seizure, etc.

Emergency Plans

Management plans established to direct actions of employees and emergency response teams.

Environmental Emergency

An environmental emergency is any incident or event resulting in or having the potential to result in environmental damage.

Chemical Spill

Potential liquid hydrocarbon or chemical spills or other releases which can create a hazard to life or property or create environmental damage. Examples include liquid hydrocarbons, compressor or other equipment lube oil, evaporative cooler acid water, liquid odorant or other substances that contain controlled or hazardous substances.

Fire

In the case of fire, set off the alarm and notify emergency services immediately.

Secure the scene and isolate the area allowing sufficient space for access by the emergency services and escape routes in the event of an escalation of the incident.

Follow evacuation procedures.

Emergency Response Team

- Emergency Co-ordinator;
- HSE Manager/Officer
- First Aider / Onsite Nurse (where applicable);
- Security Team;
- Fire Response Team (Trained employees).

Level 1 Alert (Low Incidents)

Low level short term subjective inconvenience or symptoms. No measurable physical effect. No medical treatment (Minor or First Aid Cases).

Level 2 Alert (Minor Incidents)

Objective but reversible disability / impairment and / or medical treatment injuries.

(Medical Treatment case – Minor).

Level 3 Alert (Moderate Incident)

Moderate irreversible disability or impairment medical treatment injuries and / or requiring hospitalization (Lost time Injury – Occupational Illness).

Level 4 (Major Incident)

Single fatality and /or severe irreversible disability or impairment (>30%) to one or more persons (Lost Time Injury Case, Fatality, Occupational Illness).

Level 5 (Critical Incident)

Short or long-term health effects leading to multiple fatalities, or significant irreversible human health effects to > 50 persons (Fatalities, Occupational Illness.)

Spill Incidents

Assess the risk by means of MSDS for the spilled substance before taking any action. Where necessary, call the emergency services immediately.

- Secure the scene and isolate the area to ensure the safety of people and the environment;
- Efforts to protect the environment must be weighed against the possibility of becoming part of the problem;
- The Emergency Coordinator at the environmental incident scene must remain in command of the scene of the incident until the arrival of emergency services at which time he passes on all relevant information to the person in command (where possible).

Compile a brief written report as soon as possible thereafter while the facts are still fresh.

Evacuation

An evacuation may be ordered when any hazard (e.g.: fire, gas leak, hazardous substance spill, toxic fumes) exists which may endanger employees.

Evacuations must be done according to a locally devised plan which must take environmental hazards into account.

Evacuation to be initiated by an alarm and done in accordance with this Plan.

Hazard Communication

Employees have a “right to know” and be informed regarding the chemical and other hazards that they and the environment are exposed to under normal conditions of use or in a foreseeable emergency. Information and inventories of hazardous chemicals, including Material Safety Data Sheets, must always be available where these chemicals are in use.

Employees using these products shall be trained in the specific handling precautions of substances used for their work. Induction programmes for new employees must include relevant information described here.

Ensure using appropriate and visible signs that employees not normally assigned to the work area are aware of the hazards to which these areas are subject.

Report all working conditions which may put the environment at risk.

Night Work

Night work must be avoided as far as reasonably practicable. Where such work is required, adequate lighting must be available to ensure safe execution of tasks.

Driving at night must be restricted as far as reasonably practicable without hindering the operations. Routes must be planned taking inconsideration the distance and time required, and safe stops must be identified.

5. RESPONSIBILITIES

Each employee is responsible to report any incident/accident that they may witness. In the event of an emergency, the HSE Manager and responsible Director must be notified as soon as possible, giving precise details of the location and of the nature of emergency.

Regardless of whether the emergency services have been called or not, staff that are trained to deal with the type of emergency involved, must take the appropriate actions, providing this does not put them in danger.

Where an incident occurs, personnel at the scene shall render assistance to limit further damage. Relevant emergency services **must** be contacted **immediately** as per communication flow diagram (**Annexure A**).

When making the call to the emergency services, the following information shall be clearly and precisely given:

- Name of person making the call;
- Location of the emergency;
- Nature of the emergency;
- Number of injured persons (if any); and
- Contact telephone number, so the emergency services can call back, if necessary.

5.1. Emergency Management

Emergency Team

To ensure an efficient response to an emergency, an emergency team (HSE Manager and responsible Director) must be established to assist if an emergency does occur. The members of the emergency team will be competent in one or more emergency procedures, such as management of Dangerous Goods Spill and/or medical emergency, first aid treatment or firefighting, as per the training matrix need analysis. Sufficient emergency team members shall be available at all times of operation. Where 3rd party services are used, such party must be aware of AVDWT operational hours.

Line of Communication

All incidents and accidents must be reported immediately. Where it is not possible, the first responder must make all efforts to report the incident/accident as soon as reasonably practicable.

The incident/accident must be reported to the responsible Supervisor, Control Room, HSE Manger and responsible Directors. It is the duty of the Control Room Operator to notify Senior Management.

5.2. Site Management

Upon notification that an emergency has occurred, the Senior Person on scene shall assume full responsibility to command the emergency operation including the following tasks:

Assess the situation and determine the following information:

- Emergency Codes/Level of Alert;
- Capability of on-scene personnel to control the incident;
- Potential hazards to rescue operations.

Activate relevant Emergency Response Procedures and Emergency Response Team. Secure emergency site to prevent further injuries or damage. Coordinate on-site emergency activities and implement control procedures.

5.3. HSE Manager & Officers

The HSE Manager and Officers have responsibilities for initial co-ordination of activities between relevant parties. In the absence of a supervisor (e.g.: enroute) the responsible employee will ensure compliance.

5.4. Supervisor

The Supervisor shall then respond promptly to the emergency and inform the Control Room and HSE Manager providing details of the situation.

The Supervisor in charge of the activities carried out in the area where the incident has been identified must immediately be informed about the incident by the witness/first responder.

Once informed about the incident, the Supervisor shall:

- Determine whether any personnel are injured;
- Assess the situation to determine whether it is safe to proceed with control or response operations;
- If any personnel are found to be injured, the Supervisor shall:
    - Immediately notify the Emergency Response Team;

- Determine if the access to the work area is safe for the emergency medical team and other response personnel.

5.5. First Responder

1) Personnel at the incident site shall immediately inform their Supervisor/ in case of occurrence of an incident/accident;
2) Personnel at the incident site shall immediately inform the First Aider or contact emergency services and onsite nurse (where available) if there is an injury or medical emergency. Thereafter the HSE Manager and responsible Director as soon as reasonably practicable;
3) In the case of an environmental incident, the first responder is to undertake immediate containment after having ensured that this early response does not compromise safety from any hazards present;

Do not approach a hazardous condition alone or without the proper Personal Protective Equipment (PPE).

If necessary, await the arrival of additional personnel and equipment.

4) *Remain calm; take action to reduce the effects of the potential emergency if it can be done safely;*
5) *If the person discovers a fire and has been trained to use a fire extinguisher, they may attempt to extinguish the fire. This should preferably not be attempted alone. Notify a colleague to assist;*
6) *Where electrical equipment is involved, switch off power supply if this can be done safely;*
7) *If the injury is of a serious nature, the casualty must not be move except where there is a possibility of further injury, and this should only be done by the First Aider or onsite nurse (where appliable);*
8) *Do not remove any objects involved in the incident, unless it will cause further injury or damage;*
9) *Take note of the time and circumstances of accident;*
10) *After reporting the incident and if the situation requires, then move to the assembly point;*
11) *Do not congregate at the scene of the emergency unless directly involved in assisting the emergency.*

5.6. Emergency Coordinator

In the event of a serious incident where intervention is required by the Emergency Response Team, the appointed Emergency Coordinator (Site Management) assumes overall control to ensure actions are coordinated to reduce the effects of the emergency.

The Emergency Coordinator is responsible to communicate with Senior Management and emergency teams ensuring that clear status reports are available on the situation:

- Type of incident;

- Location of incident;
- Number of injuries and types; and
- Evacuation status.

After notification of an emergency, the Emergency Coordinator will:

- Evacuate area/premises if deemed necessary;
- Coordinate evacuation activities (where required) – collect and collate assembly point attendance registers, communicate with Emergency Response Team on status of missing person(s);
- Should the emergency involve a hostage or captive situation or where weapons are involved, an immediate evacuation must be ordered of the area. No person may negotiate or attempt to attack the perpetrator.

If injuries are reported, direct the First Aiders and nurse (where available) to the location where needed.

When an emergency has stabilised, the Emergency Coordinator may, on the advice of the Emergency Response Team, declare “All clear”.

If employees are allowed back into the work area or building, the Emergency Coordinator will coordinate this with the Emergency Response Team.

Should a full evacuation away from the area/building be required, then the Emergency Coordinator will coordinate this with the Emergency Response Team.

Where the emergency results in serious damage to company property, the Emergency Coordinator will, notify employees of further action to be taken as directed by the responsible Director.

5.7. First Aider

1) Only trained persons with a valid **First Aid Certificate** may be appointed as a First Aid team member;
2) The First Aider should be notified of an incident immediately.

On notification of an emergency, the First Aider will respond by:

1) If the injured person comes to the First Aider, then an assessment of the injury should be made;
2) Minor injuries must be treated, and a record kept (notify onsite nurse – where applicable);
3) Serious injuries must be treated as best possible, and emergency services must be notified as soon as reasonably practicable;
4) Remain with injured until help arrives.

In the advent of serious injuries where emergency care is required, the First Aider may be required to provide first response assistance until emergency services arrive;

The First Aider must proceed to the scene of the incident with their first aid kit;

An assessment of the situation must be made to ensure the First Aider is not endangered before attempting to render first aid assistance;

The First Aider must remain with the injured until the injured person is handed over to the Emergency Response Team, unless there is a threat to the First Aider's life;

If casualty evacuation is required, the First Aider will assist in establishing and recording as many facts about the incident as possible;

In the event of a fatal accident, care must be taken not to disturb any objects involved before the arrival of an inspector – such action may only be taken to prevent further accidents or to rescue persons from danger.

5.8. All Employees

Must report any incident irrespective of severity to their manager/supervisor immediately, or as soon as reasonably practicable.

6. EMERGENCY PLANNING

Unplanned Events

In the event of an unplanned event occurring, effective contingency plans must be in place to deal with the situation to protect the employees and public from the effects of the emergency, remove injured persons from the scene and to enable safe operations to resume as soon as is practical.

The probable events must be determined through the hazard identification and risk assessment process once established then the Emergency Plan is drafted to include:

- Effects to Safety, Health and Environment;
- Resources available to combat emergency;
- Appoint management representative to coordinate plans;
- Train and appoint emergency response members;
- Integrate with possible Client Emergency Plans (if required);
- Document the Plan and circulate to all;
- Perform regular exercises to evaluate effectiveness of the emergency plans; and
- Perform annual reviews and update plans as required.

Emergency Response Equipment

Emergency Equipment such as First Aid Kits for vehicles must be maintained by the HSE Team in conjunction with the onsite Nurse;

The locations of emergency equipment i.e.; (first aid kits, spill kits, fire extinguishers) will be communicated to employees through Induction.

7. EMERGENCY CONTROL

Safety

When the emergency siren sound, move to the designated assembly points. The emergency evacuation routes, and assembly points map must be displayed around the premises.

Who goes where?

Move to the designated emergency area, or emergency assembly point identified.

It is vital not to panic. In case of an emergency leave your work area at once and move as fast as possible, **DO NOT RUN** to the designated area shown to you by the supervisor, via the recommended route. On arrival at your area make sure to report to the Emergency Coordinator.

Who takes charge?

Every Supervisor is responsible for getting his team safely to the designated area. On arrival at the designated area the Supervisor will report to the responsible Emergency Coordinator that all the employees from his team are accounted for. The Emergency Coordinators will report to the responsible Director.

What if someone is injured?

If someone is injured but can be moved, the First Aider should assist the person to get to the designated assembly area. Emergency Services must be notified immediately. The HSE Officer and Manager must also be notified. The supervisor should appoint someone to stay with the person while the rest go to the designated area.

What if someone is missing?

If someone is missing the Supervisor should immediately report this to the HSE Manager and responsible Director. All efforts must be made to contact the person using available communication methods (e.g.: cell phone). The assistance of the Security Contractor must be used to locate the missing person.

What to do at the designated area?

After reporting, employees should stay together until the Emergency Coordinator gives the “All clear". After the “all clear”, the Supervisor should make sure that all the people from his team return to their workplace and commence with their normal work.

Environmental

All employees are familiar with the Spill Procedure and what chemical substances are used during their activities.

Should an accidental spill occur, the following should be done immediately:

- Contain spill with sand / wood chippings;
- If possible, reposition container to minimize spill;
- If spill occurs near runoffs make sure nothing enters by blocking it off;
- Report immediately to Supervisor and HSE Officer;
- Engage in clean-up only with consent of HSE Officer;
- Sweep up with a hard broom if spill is on concrete, tar or any hard service;
- Spills on ground, needs to be dug out until clean soil is found, contaminated soil is to be placed in a durable plastic bag and sealed, to prevent contaminated soil spill.

Contaminated soil to be disposed of in a responsible manor, arranged through the HSE Officer/Manager with the assistance of the appointed Contractor in accordance with the Waste Management Plan.

Emergency Contact Number:

8. EMERGENCY CONTACT DETAILS

Emergency contact details are to be displayed on all noticeboards and in all offices and shall include:

Responsible Director(s) / Manager(s)	Neill Thompson (+264 81 362 6803)
HSE Manager	Brendan Smit (+27 63 120 3757)
Ambulance	
Security	Building Security / Contractor

Additional copies of the above emergency contact details must be displayed around the premises. All vehicle operators must also have a copy of the emergency contact details in the cab or service book holder. Supervisors are to keep the emergency contact numbers stored on their cell phones.

9. EMERGENCIES

9.1. Hazardous Chemical Leaks and Spillages

When a liquid spill (e.g.: liquid hydrocarbons, fuel, and oils, etc.) is identified, personnel at the incident must immediately inform the Supervisor, HSE Manager and Emergency Team.

The necessary materials and equipment for dealing with spills and leaks will be always available on. In the event of a spill, the source of the spillage will be isolated, and the spillage will be contained. Spill kits will be always maintained and ensure adequate supply of absorbent material to absorb/break down and designed to encapsulate minor hydrocarbon liquid spillage.

The Supervisor in charge of the team where the environment incident occurred shall immediately:

- Assess the incident site and verify that the safety of all personnel is ensured;
- Confirm and control the nature and source of the spill as quickly as possible;
- Determine the quantity/volume of the spill and the location of the impacted area(s);
- Evaluate if the spill can be contained and cleaned up by his crew or if the mobilisation of the Environmental Emergency Response Team is necessary;
- Communicate all details to the HSE Officer/Manager who will assess the level of seriousness of the situation and decide on the appropriate degree of intervention required;
- Undertake immediate containment and recovery actions as an early response in coordination with the HSE Team until arrival of the appointed Contractor.

9.2. Night Work and Travel

Night work and Travel should be avoided as far as reasonably practicable. Where such activity is required, adequate provision must be made (e.g.: lighting / active tracking of vehicle).

9.3. Vehicles

In the event of an accident the most senior person at the scene will take charge until emergency services arrives to assist. The driver must notify the Control Room/Direct Supervisor/Manager must be informed of the accident immediately.

The situation must be assessed following the accident, confirm if anyone is injured or trapped, take roll call and if necessary, to start rescue operation immediately, without further danger to the rescuers.

Witnesses/responders will do what can be done to assist the first aider/s and paramedics and in preventing further injury until help arrives, e.g.: stopping/diverting traffic, ensuring all machinery/electricity at scene is

shutdown, or making scene safe for rescue, etc. Responders are not to put themselves at risk thereby potentially increasing the chances of additional casualties.

9.4. Pedestrians Hit by Vehicle in Public Area

The driver must notify the relevant Emergency Services and liaise with the Control Room. Refer to Section 23 of the Journey Management Plan.

- In the event of an accident the driver must remain at the scene until help arrives to assist;
- The driver should only give statement(s) to Emergency Services and Police;
- The driver must give his full cooperation to the authorities;
- Responders are not to put themselves at risk thereby potentially increasing the chances of additional casualties.

9.5. Fire

Person seeing the fire must notify the nearest senior person/supervisor and the HSE Officer immediately. Only trained personnel should attempt to extinguish a fire.

Employees must evacuate to the muster points. Responsible Manager must take rollcall. Any missing person should be reported to the Emergency Team immediately.

Only when the “All Clear” has been given by the person in charge, may personnel return to their areas.

9.6. Fatal / Serious Injury

First responder must notify the nearest First Aider, Supervisor and HSE Officer immediately. The First Aider will assist the injured person/s at the scene until help arrives. The first responder will assist the first aider and in preventing further injury until help arrives, i.e.: stopping/diverting traffic, ensuring all machinery/electricity at scene is shutdown, or making scene safe for rescue, etc. Responders are not to put themselves at risk thereby potentially increasing the chances of additional casualties.

In the event of a serious or fatal accident the accident scene may not be disturbed without the approval of the HSE Manager or Responsible Director, except when it is necessary to prevent further injury or damage.

9.7. Security Breach – Captive or Hostage

In the event of a Captive or Hostage situation the most senior person at the scene will take charge until help and/or more Senior Management arrives to assist. The most senior person to notify the HSE Manager and Directors immediately or as soon as reasonably practicable. The Security Contractor must be utilized.

No person must attempt to disarm the perpetrator(s) or intervene other than to reassure the victim and the perpetrators, if possible.

The Security Contractor must assess the situation, and confirm if anyone is injured, and have all bystanders removed to a safe area immediately.

9.8. Strikes, Social or Political Unrest

In the event of Strikes, Social or Political Unrest, the most senior person at the scene will take charge until help and/or more Senior Management arrives to assist. Report to the HR Manager as soon as possible. The most senior person to notify the HSE Manager and Directors as soon as reasonably practicable.

The Security Contractor must assess the situation, and confirm if anyone is injured, if equipment and facilities have been damaged. Bystanders and staff must be evacuated to a safe area immediately.

Rollcall will be conducted to account for all personnel.

9.9. Insects, Reptiles and Animal Encounters

Taking into consideration the geographical area of AVDWT's operations, encounters with animals and wildlife must be considered.

Employees should not put their hands into or under objects you are roughly moving without examining the object first. All manner of animals/insects/reptiles may take refuge. P.P.E. must be worn!

Bees and Wasps

Do not attempt to kill or handle insects, it may result in insect stings.

It is the responsibility of each employee to notify the onsite nurse if said employee is allergic to bee stings. The employee must ensure that required medication is always carried on-person while working.

Snakes

Do not attempt to play with, kill, or handle any snakes as this might result in being bitten! Notify the Client's HSE department of snakes. If possible, ask a colleague to keep track of where the snake moves. If you are bitten, report the nearest medical personnel, do not wait until end of shift, or the next day. Call the first aider/paramedic to assist you.

Try to note the type, and identifying marks on the snake, its size and location. This is to ensure that the correct treatment is administered, if bitten. DO NOT PANIC! Snakes do not normally strike if you stand still. Back away slowly at least three paces before you turn and walk away. Note where it is located so that the snake handler can find and remove it to a safe place.

Wildlife

In certain areas during you may enter areas where bigger wildlife roam. Do not approach any animal. If you see an animal moving closer, stop and allow the animal to pass.

Medical Health Issues

Any employee who has a medical restriction, (hearing loss, colour blindness, etc.), or medical condition, (Diabetes, heart condition, Malaria, blood pressure problems, or suffers from Asthma, epilepsy, etc., or is taking any medication that impairs vision, causes drowsiness, or reduces alertness must advise the nurse.

In the event of a medical condition occurring such as a heart attack, diabetic coma, etc. the first responder must alert the first aider and nurse.

Electrocution

Beware when welding or working on electrical equipment, power tools, DB Boards, illegal cable joints, faulty electrical equipment, or accessories in rainy/wet weather in open areas, or spillages.

Sub-standard electrical tools and equipment are not permitted on site and must be discarded or sent for repairs immediately. Electrical tools and equipment must be checked against the appropriate checklists on a predetermined frequency. No joints may be made in cables and all equipment must be fully and correctly insulated. Only authorised competent personnel may work on electrical circuits.

In the event of electrocution, remain calm and attempt to isolate the electrical source, before attempting to assist the electrocuted individual(s). Administer CPR (medical trained personnel only) and notify the First Aider and nurse (where applicable).

10. TRAINING

10.1. Induction Training

All personnel working at AVDWT will be made aware of the requirements of this procedure during induction and training.

10.2. Specific Training

Specific training will be given, as required, to those staff with responsibilities associated with Emergency Response:

Training will be provided to personnel involved in:

- The handling and/or storage of hazardous materials (this includes refuelling operations);
- First Aid;
- Fire Fighting;
- Emergency Assembly.

Refresher courses may be undertaken as required or identified. Proof of attendance and a signed attendance register for each session will be provided; and

Training in spill containment/clearance techniques will be given to staff involved with emergency response (Emergency Response Team).

10.3. On-Site Training (Toolbox Talks)

Toolbox talks for each team will be undertaken during the project on different emergency situations.

11. EMERGENCY DRILLS AND RESPONSE TESTING

Periodic testing of the emergency response arrangements will be undertaken, and the lessons learned identified (as following an actual incident), and improvements implemented. Training will include a Chemical Spill Response course for key personnel.

Emergency drills shall be conducted every three (3) months as a minimum, and more frequent if reasonably practicable. The MOC Drill shall enable to review and evaluate the efficiency of the response system and review as necessary, the Emergency Response procedure.

The emergency drill will be conducted to accomplish the following objectives:

As a training mechanism to familiarise personnel with their duties and responsibilities in terms of environmental incidents:

- To evaluate the preparedness of each party involved in the procedure, including regulatory agencies and support services, if applicable;
- To test the initial communications sequence and reporting procedures;
- To verify that contact numbers are correct;
- To examine the interaction between the individuals and groups named in this procedure and to address identifiable shortfalls in the established lines of communication; and
- To improve the procedure itself and its efficiency;
- Training of the Emergency Response Team will be ensured through providing frequent support to the teams on site for addressing the management of spills of moderate size;
- This will be used as a practice to increase the efficiency and rapidity of response of the team.

12. REPORTING

The HSE Manager to notify the Client as soon as reasonably practicable of any level 3, 4 or 5 incidents where the Client may be affected. Additional reporting structures may be required if requested by any Client.

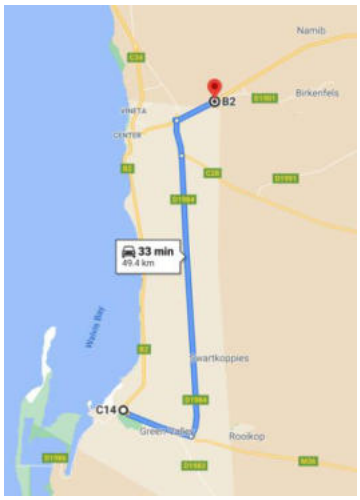
13. DOCUMENT REVISIONS

Date	Revision	Description of Revision
15 November 2024	00	Draft.

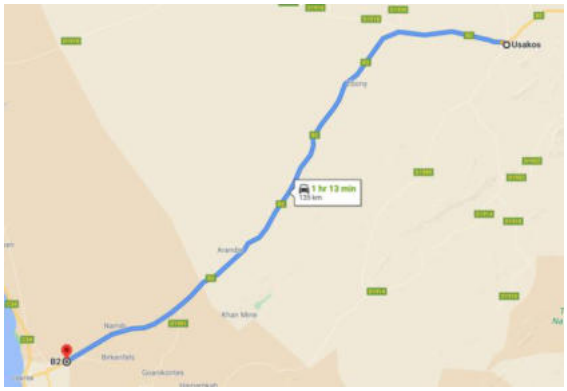
12. APPENDIX B - SPECIFIC ROUTE ASSESSMENT SURVEY

Route Survey: Walvis Bay, Namibia to Kitwe, Zambia

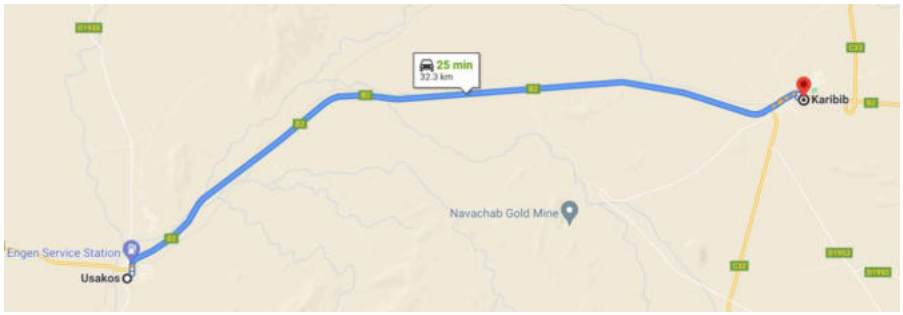
1. Walvis Bay, Depot to Swakopmund, Depot – 49.4km
   - D1984 via Dune Seven
   - Newly constructed road 5/5 condition (roundabouts, fog early morning)
   - Emergency Teams available from Depot Swakopmund / Walvis Bay
   - Potholes and damaged road in Walvis Bay town



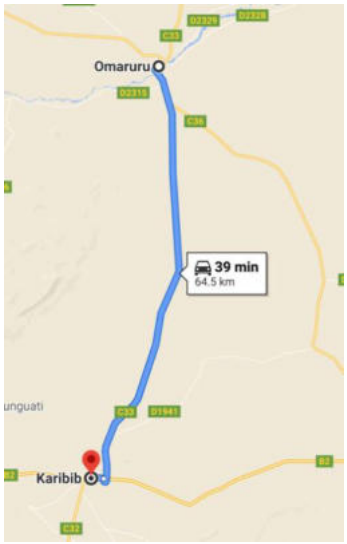
2. Swakopmund, Depot to Usakos – 135km
   - Road condition 4/5 (narrow, heavy traffic, fog early morning)
   - Emergency: +26481208270/+264855584123, Johan, A vd Walt Trp
   - 360 Stop: 46.3km from Swakopmund open parking area left and right-hand side of road



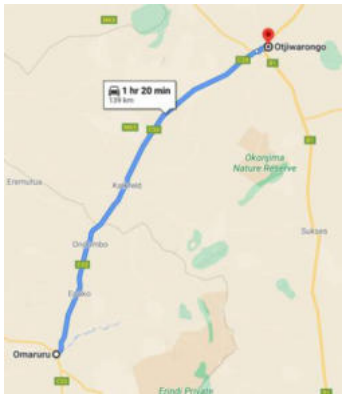
3. Usakos to Karibib – 32.3km
   - Road condition 4/5 (narrow, heavy traffic)
   - Emergency: +26481208270/+264855584123, Johan, A vd Walt Trp
   - Emergency: +264813118318, Pitbull Tow-In
   - Roadworks between Usakos and Karibib.



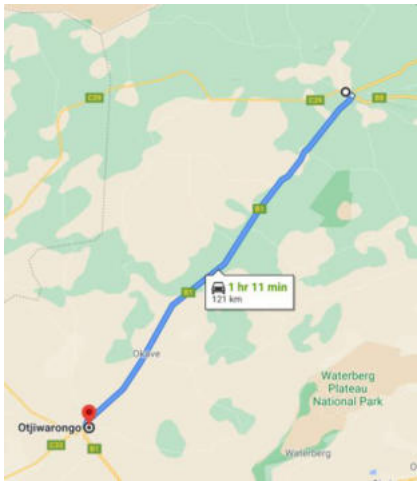
4. Karibib to Omaruru – 64.5km
    - Road condition 4/5 (minor potholes, uneven road wear)
    - Emergency: +264813118318, Pitbull Tow-In
    - Emergency: +264814088445, Thomas and Gerrit +26411227680
    - 360 Stop: 4.2km from Omaruru layby on left-hand side of road



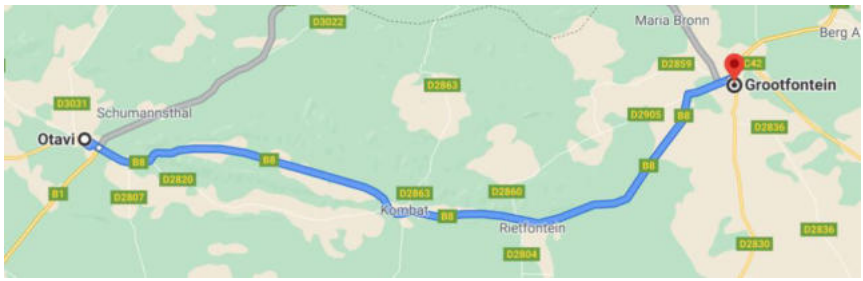
5. Omaruru to Otjiwarongo – 139km
    - Road condition 4/5 (animals)
    - Emergency: +264814461956, Ferdi de Jager



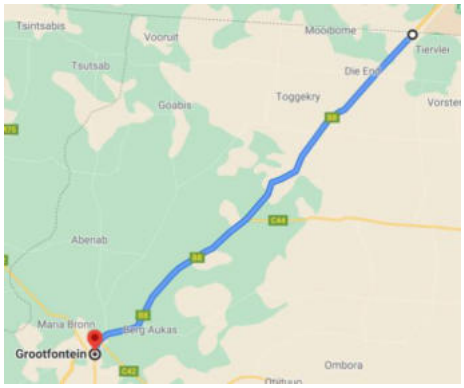
6. Otjiwarongo to Otavi – 121km
    - Road condition 4/5 (animals, heavy traffic)
    - Emergency: +264814461956, Ferdi de Jager
    - 360 Stop



7. Otavi to Grootfontein – 95.2km
    - Road condition 4/5
    - Emergency: +264818717002, Pieter
    - Emergency: +264818717001, Otjiwanda Truck Repairs
    - 360 Stop: 44.8km from Otavi at Kombat turn-off



8. Grootfontein to Mururani Veterinary Gate – 128km
    - Road condition 4/5 (uneven road wear, animals)
    - Emergency: +264818717003 Pieter, Otjiwanda Truck Repairs
    - 360 Stop: Mururani Veterinary Gate

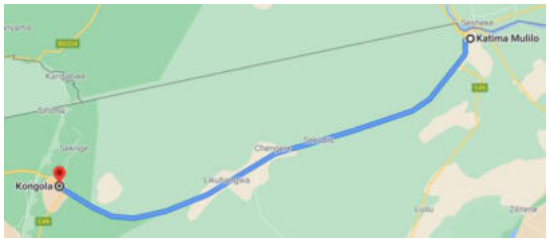


9. Mururani Veterinary Gate to Rundu – 131km
    - Road condition 3/5 (heavy traffic, animals, uneven road wear, minor potholes, pedestrians)
    - Emergency: +264811280081 Marnu, Advance Truck Repair

10. Rundu to Divundu – 201km
    - Road condition 3/5 (heavy traffic, animals, uneven road wear, minor potholes, pedestrians)
    - Emergency: +264811280081, Advance Truck Repair
    - Emergency: +264811279172, Toze
    - 360 Stop: 47.5km from Rundu at Mashare turn-off

11. Divundu to Kongola – 202km
    - Road condition 3/5 (heavy traffic, animals, uneven road wear, minor potholes, pedestrians)
    - Emergency: +264811279172, Toze
    - Emergency: +264811622142, Pottie, A vd Walt Trp
    - 360 Stop: Kongola Check Point

12. Kongola to Katima Mulilo – 112km
    - Road condition 4/5 (heavy traffic, animals, uneven road wear, minor potholes, pedestrians)
    - Emergency: +264811622142, Pottie, A vd Walt Trp
    - 360 Stop: Katima Mulilo Depot



13. Katima Mulilo / Sesheke Border
    - Border congestion Namibia and Zambia side
    - Limited parking within Customs areas
    - Emergency: +264811622142, Pottie, A vd Walt Trp
    - Emergency Zambia: +260965170792, Fernando