

BENGUELA PETROLEUM SUPPLIES CC

ENVIRONMENTAL MANAGEMENT PLAN REPORT

**THE PROPOSED DEVELOPMENT AND OPERATION OF A BULK FUEL STORAGE
FACILITY**

LOCATED IN NORTH PORT, WALVIS BAY, ERONGO REGION, NAMIBIA

FEBRUARY 2026



DOCUMENT CONTROL	
REPORT TITLE	SCOPING (INCLUDING ASSESSMENT) REPORT FOR THE PROPOSED DEVELOPMENT AND OPERATION OF A BULK FUEL STORAGE FACILITY
PROJECT NO.	JF245
CONSULTANT	I.N.K ENVIRO CONSULTANTS CC P.O BOX 31908 WINDHOEK NAMIBIA
CLIENT	BENGUELA PETROLEUM SUPPLIES CC 28 LANGER HEINRICH CRESANT STREET, KEJIN PARK WALVIS BAY NAMIBIA
DATE	FEBRUARY 2026
CURRENT REVISION	FINAL REPORT
AUTHOR	MR. IMMANUEL KATALI

CONSULTANT'S EXPERTISE

I.N.K Enviro Consultants cc is the independent firm of consultants that has been appointed by Benguela Petroleum Supplies ccto undertake the environmental impact assessment process.

Immanuel N. Katali, the EIA Lead Practitioner holds a B.Arts (Honors) in Geography, Environmental Studies and Sociology and has over nine years of relevant experience in conducting/managing Environmental Impact Assessments (EIAs), Socio-Economic Impact Assessments (SIA) and compiling Environmental Management Plans (EMPs) in Namibia. Immanuel is certified as an environmental practitioner under the Environmental Assessment Professionals Association of Namibia (EAPAN).

DECLARATION OF INDEPENDENCE AND DISCLAIMER

The consultant herewith declare that this report represents an independent, objective assessment of the environmental impacts associated with the activities of the proposed small-scale mining activities on the request of Benguela.

I.N.K has prepared this report based on an agreed scope of work and acts in all professional matters as an independent environmental consultant to Benguela and exercises all reasonable skill and care in the provision of its professional services in a manner consistent with the level of care and expertise exercised by members of the environmental profession.

The information, statements and commentary contained in this Report have been prepared by I.N.K from information provided by Benguela and from discussions held with stakeholders. I.N.K does not express an opinion as to the accuracy or completeness of the information provided, the assumptions made by the party that provided the information, or any conclusions reached. I.N.K has based this Report on information received or obtained, on the basis that such information is accurate and, where it is represented to I.N.K as such, complete.

I.N.K is not responsible and will not be liable to any other person or organisation for or in relation to any matter dealt within this report, or for any loss or damage suffered by any other person or organisation arising from matters dealt with or conclusions expressed in this report (including without limitation matters arising from any negligent act or omission of I.N.K or for any loss or damage suffered by any other party relying upon the matters dealt with or conclusions expressed in this report). This report must not be altered or added to without the prior consent of I.N.K and Benguela.

TABLE OF CONTENTS

1 INTRODUCTION	6
1.1 Introduction to the Proposed Project	6
1.2 Background	6
1.3 Environmental Management Plan (EMP)	6
1.4 Details of the persons who compiled this ESMP	7
2 EMP ADMINISTRATION	8
3 Applicable Laws and Guidelines	8
3.1 Applicable Laws and Policies	9
3.2 National Policies and Plans	10
3.3 Summary of Applicable Namibian legislation and standards	10
3.4 Applicable Listed activities	11
4 ROLES AND RESPONSIBILITIES	12
4.1 Environmental Control Officer (ECO)	12
4.2 Liaising with Contractors	12
5 CONSTRUCTION PROCEDURES	12
6 ENVIRONMENTAL MONITORING AND AUDITING	13
7 ENVIRONMENTAL AWARENESS	13
8 PUBLIC PARTICIPATION	14
9 Environmental Site Induction	14
10 Toolbox talks	15
11 ENVIRONMENTAL ACTION PLANS	16
11.1 Action plans to achieve objectives and goals	16

LIST OF FIGURES

Error! No table of figures entries found.

LIST OF TABLES

Table 1 : relevant legislation and policies	9
Table 2 : Listed activities triggered by the proposed Project	11
Table 1 : Action Plan – Fire Prevention (Health and Safety)	16
Table 2 : Action Plan – Hydrocarbon, Product Handling and associated spills Management	17
Table 3 : Action Plan – Waste management	18
Table 4 : Action Plan - Visual Impacts	19
Table 5 : Action Plan –Noise and Dust Pollution	19
Table 6 : Action Plan – Social Issues & Training	20
Table 7 : Action Plan – Economic, Job Creation and Skills Development	21
Table 8 : Action Plan – Groundwater and surface water contamination	21
Table 12 : Action Plan – Traffic Management	22

Table 11 : Action Plan – Management and Monitoring24
Table 11 : Action Plan – Communication and Stakeholder Consultation24
Table 11 : Action Plan – Communication and Stakeholder Consultation25

1 INTRODUCTION

1.1 Introduction to the Proposed Project

1.2 Background

Benguela Petroleum Supplies cc (hereinafter referred to as Benguela) intends on obtaining an Environmental Clearance Certificate (ECC) for their proposed development and operation of a bulk fuel storage facility (Diesel, ULP, JET A 1, HFO / VLSFO), with a maximum capacity of 120 000 000 litres in above-ground fuel tanks on a piece of land measuring approximately 10 hectares (ha), located within the North Port of Walvis Bay, Erongo Region Namibia (Figure 1 and 2).

The objective of the proposed project is to support the fuel and transport activities of Walvis Bay by creating an alternative bulk supply of fuel to commercial retail industries such as fuel stations in Walvis Bay and across the country.

Prior to the implementation of the activities, environmental clearance is required from the Ministry of Environment, Forestry and Tourism (MEFT): Department Environmental Affairs (DEA) based on an approved EIA process, in terms of the Environmental Management Act, 2007 (No. 7 of 2007).

I.N.K Enviro Consultants cc, an independent firm of environmental consultants based in Namibia, has been appointed by Benguela to undertake and manage the EIA process.

1.3 Environmental Management Plan (EMP)

This EMP report serves as a managing tool for the development of the Fuel Storage Facility. The report details actions to ensure compliance with regulatory bodies and that environmental performance is verified through information on impacts as they occur.

The EMP will be implemented during the construction and operations phase with the intention of implementing the recommended mitigation measures.

The document further serves as a guiding tool for the proponent, contractors and workforce on their roles and responsibilities concerning environmental management on site and provides an environmental monitoring framework for all project phases of the proposed activities. This environmental management plan aims to take a proactive route by addressing potential problems before they occur.

EMP implementation is a cyclical process that converts mitigation measures into actions and through cyclical monitoring, auditing, review and corrective action, ensures conformance with stated EMP aims and objectives. Through monitoring and auditing feedback for continual

improvement in environmental performance must be provided and corrective action taken to ensure that the EMP remains effective.

1.4 Details of the persons who compiled this ESMP

I.N.K Enviro Consultants cc is the independent firm of environmental consultants that has been appointed to compile the EMP prior to the construction and operations activities.

Immanuel N. Katali, the Environmental Assessment Practitioner holds a B.Arts (Honors) Geography, Environmental Studies and Sociology and has over nine (9) years of relevant experience in conducting/managing Environmental Impact Assessments (EIAs), and Environmental Compliance/Monitoring Audits in Namibia. Immanuel is certified as an Environmental Assessment Practitioner under the Environmental Assessment Professionals Association of Namibia (EAPAN).

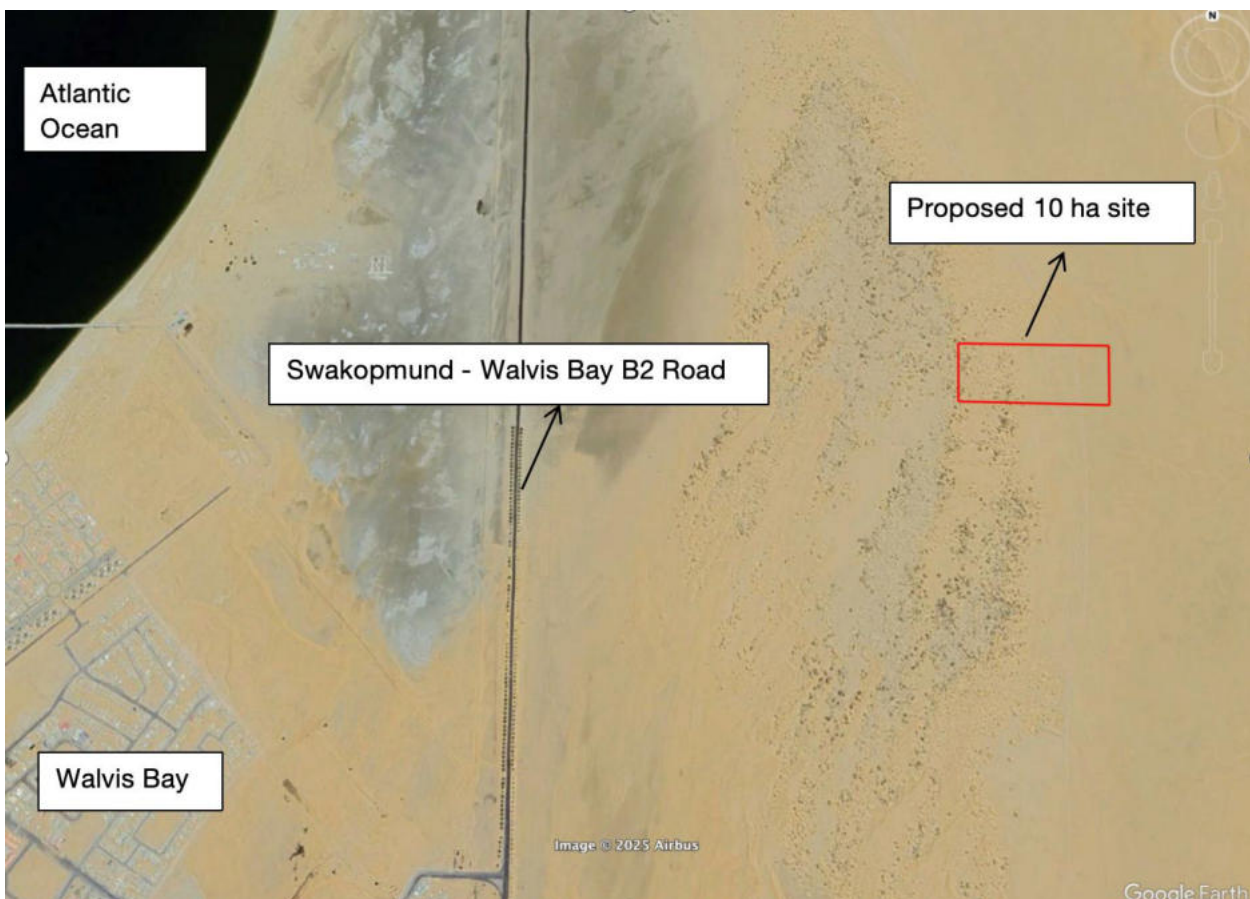


Figure 1: Locality Map

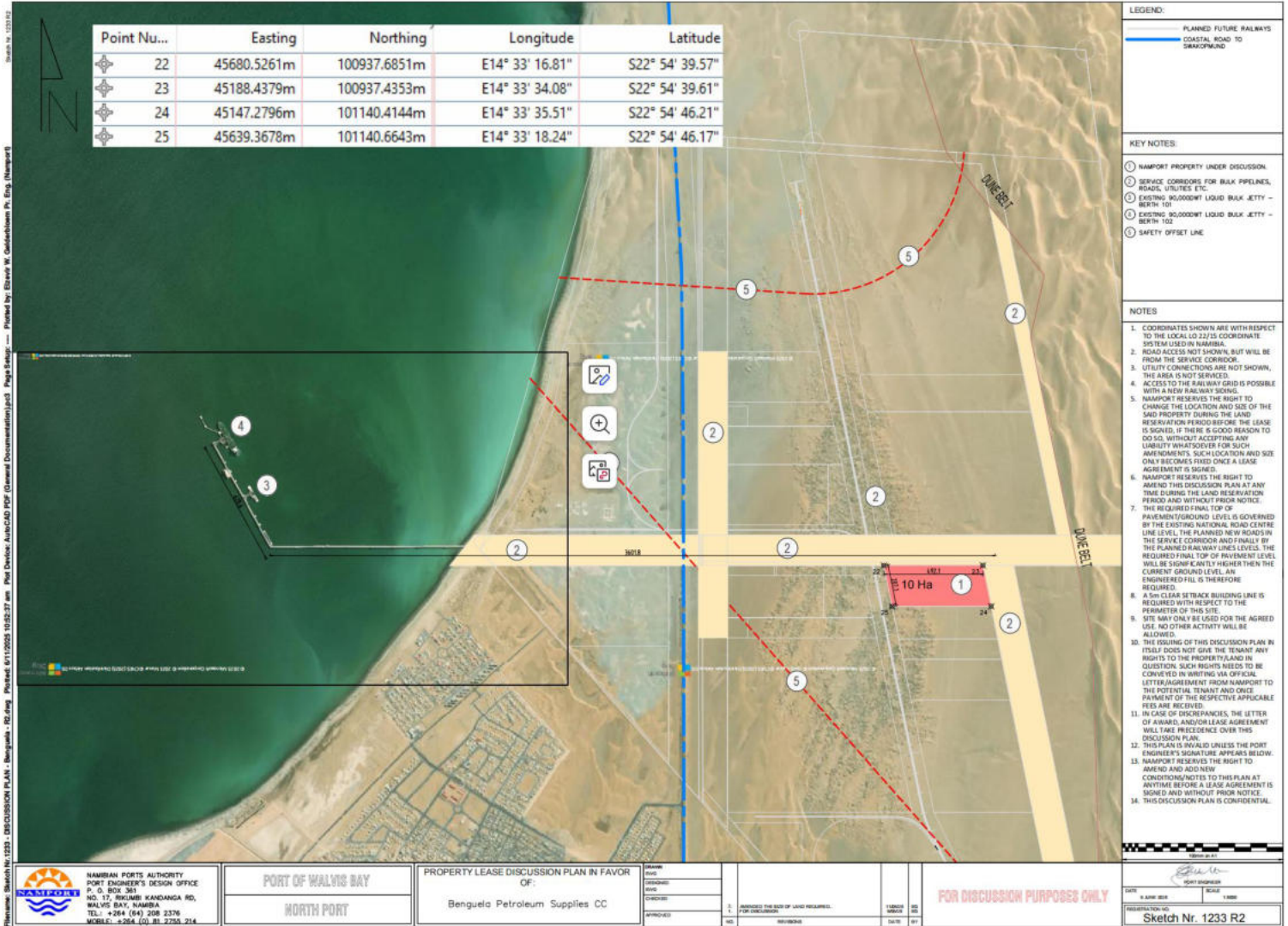


Figure 2: Technical Layout

2 EMP ADMINISTRATION

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

3 Applicable Laws and Guidelines

The Republic of Namibia has five tiers of law and a number of policies relevant to environmental assessment and protection, which includes:

- The Constitution.
- Statutory law.
- Common law.
- Customary law.
- International law.

Relevant policies currently in force include:

- The EIA Policy (1995).
- Namibia's Environmental Assessment Policy for Sustainable Development and Environmental Conservation (1994).
- The National Climate Change Policy of Namibia (September 2010).
- Policy for the Conservation of Biotic Diversity and Habitat Protection (1994).

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

The management and regulation of the proposed activities falls within the jurisdiction of the Ministry of Mines and Energy (MME), with environmental regulations guided and implemented by the Department of Environmental Affairs (DEA) within the Ministry of Environment, Forestry and Tourism (MEFT).

The section below summarised the various applicable laws and policies, international treaties and protocols.

3.1 Applicable Laws and Policies

In the context of the proposed activities, there are several laws and policies currently applicable. They are reflected in Table below.

Table 1: relevant legislation and policies

YEAR	NAME	Natural Resource Use (energy & water)	Emissions into the air (fumes, dust & odours)	Emissions to land (non-hazardous & hazardous)	Emissions to water (industrial & domestic)	Noise (remote only)	Visual	Vibrations	Impact on Land use	Impact on biodiversity	Impact on Archeology	Emergency situations	Socio-economic	Safety & Health	Other
1990	The Constitution of the Republic of Namibia of 1990	X	X	X	X	X	X	X	X	X	X	X	X	X	
1997	Namibian Water Corporation Act, 12 of 1997	X											X		
2013	Water Resources Management Act 11 of 2013	X			X								X		
2004	National Heritage Act 27 of 2004										X			X	
2007	Environmental Management, Act 7 of 2007	X	X	X	X	X	X	X	X	X	X		X	X	
2012	Regulations promulgated in terms of the Environmental Management, Act 7 of 2007	X	X	X	X	X	X	X	X	X	X	X	X	X	X
1975	Nature Conservation Ordinance 14 of 1975	X			X					X	X				
1976	Atmospheric Pollution Prevention Ordinance 11 of 1976		X												

YEAR	NAME	Natural Resource Use (energy & water)	Emissions into the air (fumes, dust & odours)	Emissions to land (non-hazardous & hazardous)	Emissions to water (industrial & domestic)	Noise (remote only)	Visual	Vibrations	Impact on Land use	Impact on biodiversity	Impact on Archeology	Emergency situations	Socio-economic	Safety & Health	Other
1995	Namibia's Environmental Assessment Policy for Sustainable Development and Environmental Conservation	X	X	X	X	X	X	X	X	X	X	X		X	
2004	Pollution Control and Waste Management Bill (3rd Draft September 2003)		X	X	X	X									
1990	Petroleum Products and Energy Act, No. 13 of 1990		X	X	X					X				X	X
1974	Hazardous Substance Ordinance No. 14 of 1974	X	X	X						X		X		X	

3.2 National Policies and Plans

Namibia's policies provide the framework to the applicable legislation. Whilst policies do not often carry the same legal recognition as official statutes, policies are used in providing support to legal interpretation. Relevant policies and plans currently in force include:

- The EIA Policy (1995).
- Namibia's Environmental Assessment Policy for Sustainable Development and Environmental Conservation (1995).
- White Paper on the Energy Policy, 1998.
- Namibia Vision 2030.
- National Development Plan, 201/2018 – 2021/2022, guided by Vision 2030.
- Policy for the Conservation of Biotic Diversity and Habitat Protection, 1994.
- Namibia's Second National Biodiversity Strategy and Action Plan (2013-2022).
- National Environmental Health Policy (2002).
- National Waste Management Policy (2010).
- The National Climate Change Policy of Namibia (September 2010).
- New Equitable Economic Empowerment Framework Policy, 2011.
- National Rangeland Management Policy and Strategy of 2012

3.3 Summary of Applicable Namibian legislation and standards

In the context of the Project and associated infrastructure, the following legislation is applicable:

- The Public Health Act 36 of 1919.
- Water Act, 1956 (No. 54 of 1956), as amended.
- Explosive Act No. 26 of 1956.

- National Monuments Act 28 of 1969.
- Soil Conservation Act 76 of 1969.
- Nature Conservation Ordinance 14 of 1975.
- Atmospheric Pollution Prevention Ordinance 11 of 1976.
- The Constitution of the Republic of Namibia of 1990.
- Nature Conservation General Amendment Act 1990.
- Foreign Investment Act No. 27 of 1990.
- The Regional Councils Act No. 22 of 1992.
- Nature Conservation Amendment Act 5.
- Namibian Water Corporation Act, No. 12 of 1997.
- Road Traffic and Transport Act, 1999 (No. 22 of 1999).
- Pollution Control and Waste Management Bill (3rd Draft September 2003).
- National Heritage Act 27 of 2004.
- Labour Act, 2007 (No. 11 of 2007).
- Environmental Management, Act 7 of 2007.
- Regulations promulgated in terms of the Environmental Management, Act 7 of 2007.
- Water Resources Management Act 11 of 2013.
- Public and Environmental Health Act No. 1 of 2015.
- Nature Conservation Amendment Act 3.

3.4 Applicable Listed activities

The EIA Regulations promulgated in terms of the Environmental Management Act identify certain activities which could have a substantially detrimental effect on the environment. These listed activities require environmental clearance from MEFT prior to commencing. The following activities identified in the regulations apply to the proposed Tumas Project:

Table 2: Listed activities triggered by the proposed Project

LISTED ACTIVITY
9.1 The manufacturing, storage, handling or processing of a hazardous substance defined in the Hazardous Substance Ordinance, 1974.

4 ROLES AND RESPONSIBILITIES

4.1 Environmental Control Officer (ECO)

The Environmental Control Officer (ECO) will be a competent person appointed by the contractor to implement the on-site environmental and social management of this EMP. The ECO shall be on site daily and the ECO's duties will include the following:

- Maintaining open and direct lines of communication between the ER, Employer, Contractor and interested and affected parties (I&APs) regarding environmental matters.
- Daily site inspections of all construction areas regarding compliance with the EMP.
- Daily monitoring and verifying adherence to the EMP monitoring and verifying that environmental impacts are kept to a minimum.
- Monitoring and verifying adherence to the EMP, monitoring and verifying that environmental impacts are kept to a minimum.
- Assisting the Contractor in finding environmentally responsible solutions to problems.
- Monitoring the undertaking by the Contractor of environmental awareness training for all new personnel coming onto site.
- Convening and facilitating public meetings.
- Assisting the ER in ensuring that the necessary environmental authorizations and permits have been obtained.

4.2 Liaising with Contractors

The ECO is responsible for informing the contractors of any decisions that are taken concerning environmental management during the construction and operations phase. This may also include advising and informing the contractors of the necessary corrective action to be taken.

5 CONSTRUCTION PROCEDURES

The Contractor shall submit written procedures for all activities that could be potentially harmful to the environment. Such construction procedures shall include timing of activities, equipment and materials to be used (where applicable), visual screening, protection of the site, methods for cleaning the site both during construction and on completion of the works, disposal of waste and any other information deemed necessary. Construction procedures shall be submitted to the Principal Agent at least five working days prior to commencing work on an activity. The Contractor shall not commence work on any activity until such time as the construction procedure has been scrutinized and agreed to in writing by the Principal Agent.

In addition, the Principal Agent may call for emergency construction procedures to be submitted within 24 hours of work commencing on activities that are deemed harmful to the environment and for activities of which he was previously unaware. If necessary, changes may be made to

the construction procedures once construction has commenced. In such instances the proposed changes must be agreed to in writing by the Principal Agent prior to commencing with the change.

6 ENVIRONMENTAL MONITORING AND AUDITING

Auditing should be conducted at least once every 3 months by an Independent Environmental Consultant during construction. Benefits derived from the audit process may include:

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

7 ENVIRONMENTAL AWARENESS

Before any work commences on the site, the Contractor and ECO shall ensure that the EMP is distributed to all Subcontractors. The Contractor shall liaise with the Engineer during establishment phase to fix a date and venue for the training and to agree on the training content.

It is the responsibility of the Subcontractors to ensure that their workers comply with the EMP measures during construction.

The Contractor shall provide a suitable venue and ensure that the specified Employees' attend the course. The Contractor shall ensure that all attendees sign an attendance register and shall provide the ER with a copy of the attendance register. The presentation shall be conducted, as far as is possible, in the employees' language of choice.

As a minimum, the contractor, along with the ECO should:

- Explain the importance of complying with the EMP.
- Discussion of the potential environmental impacts of construction activities.
- The benefits of improved personal performance.

- Employees' roles and responsibilities include emergency preparedness.
- Explanation of the mitigation measures that must be implemented when carrying out their activities.
- Explanation of the specifics of this ESMP and its specification (no-go areas, etc.)
- Explanation of the management structure of individuals responsible for matters pertaining to the ESMP.
- The ECO shall keep records of all environmental training sessions, including names, dates and the information presented.

8 PUBLIC PARTICIPATION

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

9 Environmental Site Induction

All new members of staff receive to Environmental Induction along with the obligatory Health & Safety induction. The induction gives a general overview of the environmental challenges faced by the project, how we are managing them, and general tips for reducing our impact in the workplace.

The main reason for environmental induction is to encourage new staff to be environmentally aware right from the beginning of their employment. This will ensure that environmental initiatives are successful by eliminating bad habits from the start.

Before working on site, all personnel and sub-contractors will undertake a site induction incorporating environmental requirements. The induction will address a range of environmental awareness issues specific to the Irrigation Project.

As a minimum, training shall include:

- ◆ Explanation on the importance of complying with the EMP and environmental implications should the EMP not be effectively implemented.
- ◆ Discussion of the potential environmental impacts of operational activities, recognition of environmental risks e.g. oil spill, paint etc. and how to control these risks.
- ◆ The benefits of improved personal performance, understanding of what to do in case of an environmental event or exposure.
- ◆ Employees' roles and responsibilities, including emergency preparedness.
- ◆ Explanation of the mitigation measures that must be implemented when carrying out operational activities.

- ◆ Explanation of the requirements of the EMP and its specification (no-go areas, etc.)
- ◆ Explanation of the management structure of individuals responsible for matters pertaining to the EMP.

The training will generally be prepared by the Environmental Manager or delegated responsible party.

10 Toolbox talks

'Toolbox' talks will assist in communicating relevant information to the workforce and providing feedback on issues of interest or concern. Toolbox talks shall be held on a weekly basis. Environmental topics shall (as far as possible) be sent out to all employees and contractors to be discussed at the toolbox talks.

Environmental work procedures detail the required subjects to be addressed in 'toolbox' talks topics may also include:

- ◆ The efficient use of materials.
- ◆ Waste management, minimisation and recycling.
- ◆ Management of hazardous materials.
- ◆ Protection of Biodiversity
- ◆ Management of pollution.
- ◆ Work methods.

Records of toolbox talk topics and persons attending will be retained on site in a register.

11 ENVIRONMENTAL ACTION PLANS

The management measures proposed to mitigate the potential impacts relating to the operation phase are detailed in the action plans below.

11.1 Action plans to achieve objectives and goals

Action plans to achieve relevant objectives/goals are listed in tabular format together with timeframes for each action. The action plans include the timeframes and frequency for implementing the mitigation measures as well as identifying the responsible party.

Table 1: Action Plan – Fire Prevention (Health and Safety)

Objective:

The objective of the mitigation measures is to prevent fires and explosions on site.

Activities / facilities	Management and mitigation measures	Action plan	
		Frequency / target date	Responsible parties
Fuel Storage and Handling	<ul style="list-style-type: none"> • Turn off truck engine during fuel delivery and pick up • Provide annually rigorous re-fresher safety training to employees to ensure that they remain familiar with the dangers associated with the fuel storage and handling activities. In-house training program being developed for employees. • Don't smoke, light a match, or use a lighter near the fuel storage tank. • Remain undistracted during activities. This is the process of transferring a hazardous substance from one place to another, and it demands your full attention. • Refrain from using a cell phone, computer, or portable radio while refueling. If you must use electronic devices, follow the manufacturer's instructions for use near tanks. • Don't "top off" the tank as this could lead to spills or overfilling. • Once fueling is complete, leave the nozzle in the tank for a few seconds to avoid drips. 	Throughout operations	Supervisor

Table 2: Action Plan – Hydrocarbon, Product Handling and associated spills Management

Objective:

The objective of the mitigation measures is to handle and store hydrocarbons in such a way as to prevent spills. Where spills do occur, to ensure the spill is contained and the contamination cleaned-up and contaminated material disposed of responsibly.

Activities / facilities	Management and mitigation measures	Action plan	
		Frequency / target date	Responsible parties
Machinery, generators and equipment	<ul style="list-style-type: none"> Establish and maintain impermeable bunded / drip trays around machinery, generators and equipment. Machinery and equipment shall be kept in good working condition to ensure they do not leak oil/diesel. Benguela to undertake an audit of operations to ensure that proper controls are in place. In the event where machinery needs to be repaired/serviced on site, all care shall be taken to prevent spillage of oil/diesel by performing the work on impermeable surfaces or proper placement of drip trays. All used parts machinery (which may include, but not limited to, oil filter, pipes, rags, cans) will be collected and removed from site and disposed of in an appropriate manner. Regular inspection of fuel storage tanks for leakages and wear is required. Benguela to ensure an onsite emergency plan is generated. Regular environmental awareness should include potential risks associated with hydrocarbons. 	Throughout construction and operations	Supervisor
Storage of the fuel	<ul style="list-style-type: none"> The fuel shall only be stored in the fuel tanks being undamaged and sealed. Damaged fuel tank shall be sealed/repared immediately with appropriate material. A Standard Operating Procedure (SOP) must be developed for fuel handling and storage. 	Throughout the operations	Supervisor

	<ul style="list-style-type: none"> • Tanks etc. must be handled carefully and stored accordingly to the manufacturer's specifications. • Damaged fuel tank must be correctly handled & repaired to avoid contamination of the soil and other third parties' facilities. • The tank must be inspected on a daily basis to ensure they are not damaged. 		
General (spills)	<ul style="list-style-type: none"> • An oil spill contingency plan should be in place prior chemical handling and storage operations • Any spills will be contained and cleaned up immediately. • Spill kits will be readily available on site. Employees and/or contractors will be shown how to use the spill kits to enable containment and remediation of pollution incidents. • "Firewatch" staff will be identified and trained. • The contractor will establish environmental awareness to employees. 	Throughout construction and operations	Supervisor

Table 3: Action Plan – Waste management

Objective:

The objective of the management measures is to ensure proper storage, removal, transportation and disposal/recycling of hazardous and non-hazardous (i.e. domestic) waste.

Activities / facilities	Technical and management options	Action plan	
		Frequency / target date	Responsible parties
General	<ul style="list-style-type: none"> • Waste shall be separated and recycled / re-used where possible. • No burning of waste material will be allowed on site. • Contractors will be shown the importance of correct waste disposal as well as waste minimisation and recycling. 	Throughout construction and operation	Supervisor
		Throughout construction and operations	Supervisor
		Throughout construction and operations	Supervisor
Collection and storage	<ul style="list-style-type: none"> • Suitable receptacles with lids for waste disposal 	Throughout	Supervisor

of waste	<p>will be required on site.</p> <ul style="list-style-type: none"> • Ensure animals do not have access to waste bins. All food scraps need to be removed from the site on a daily basis. • If rubbish containers are used, ensure these can be sealed from strong wind and sealed during transport. 	construction and operations	
Disposal of non-hazardous (domestic) waste	<ul style="list-style-type: none"> • Waste shall be transported to the Okahandja Landfill site on a weekly basis. No disposal of waste on site and no burning of waste. 	Throughout construction and operations	Supervisor
Disposal Hazardous Waste	<ul style="list-style-type: none"> • Hazardous Waste and hydrocarbon contaminated material/soil will be disposed of off at the Walvis Bay or Kupferberg Hazardous Waste Disposal Facility. 	Throughout construction and operations	Supervisor
Medical waste from First Aid Kit	<ul style="list-style-type: none"> • Medical waste where appropriate shall be disposed of at the medical waste facility. 	Throughout construction and operations	Supervisor
Disposal records (domestic and industrial)	<ul style="list-style-type: none"> • Written evidence of safe disposal of waste will be kept. 	Throughout construction and operations	Supervisor

Table 4: Action Plan - Visual Impacts

Objective:

The objective of the mitigation measures is to avoid (as far as possible) visual impacts to travellers and nearby communities.

Activities / facilities	Technical and management options	Action plan	
		Frequency / target date	Responsible parties
Installation of fuel storage tank	Ensure that the operations and facilities are well maintained and kept in good order.	Throughout the operations	Supervisor

Table 5: Action Plan –Noise and Dust Pollution

Objective:

The objective of the mitigation measures is to prevent negative noise pollution impacts emitted from the project.

Activities / facilities	Technical and management options	Action plan	
		Frequency / target date	Responsible

			parties
Noise Generated	<ul style="list-style-type: none"> The construction is limited to day-time only and no construction should be allowed during the night. Development of a mechanism to monitor noise levels, record and respond to complaints and mitigate impacts. 	<ul style="list-style-type: none"> Throughout construction 	Supervisor
Dust Generation	<ul style="list-style-type: none"> Dust suppression methods should be implemented daily, such as water. Implementation of dust buckets to monitor dust over a period and sent to laboratories for analysis. Should dust levels be excessive, an air quality specialist should be appointed to undertake an air quality investigation. 	<ul style="list-style-type: none"> Throughout construction 	Supervisor

Table 6: Action Plan – Social Issues & Training

Objective:

The objective of the mitigation measures is to prevent negative social impacts associated with the workforce.

Activities / facilities	Technical and management options	Action plan	
		Frequency / target date	Responsible parties
Employees - social issues	<ul style="list-style-type: none"> Have zero tolerance to alcohol in the workplace. A First Aid Kit should be available at all times. Workforce will not be permitted to construct residential dwellings on site. All workforce should commute from the nearby towns on a daily basis during construction and operations. 	<ul style="list-style-type: none"> Prior to operation activities Throughout the operations 	Supervisor
Training & Awareness	All individuals who work on site are aware of the contents of the EMP.	<ul style="list-style-type: none"> Prior to operation activities Throughout the operations 	Supervisor
Socio-Economic	Emissions from the operations could result in the contamination of the neighboring sites and their products, thereby impacting them economically.	<ul style="list-style-type: none"> Throughout the operations 	Supervisor

	The management and mitigation measures in the preceding sections of this report will be implemented in order to manage this risk.		
--	---	--	--

Table 7: Action Plan – Economic, Job Creation and Skills Development

Objective:

The objective of the mitigation measures is to enhance positive economic impacts.

Activities / facilities	Technical and management options	Action plan	
		Frequency / target date	Responsible parties
Recruitment	<ul style="list-style-type: none"> • Have approachable person as she/he will be a key link between the community in the area and the project. • Demonstrate its efforts to recruit employees from Ariamsvlei and Karas Region. • Be gender sensitive and select women for interview, training and recruitment. 	<ul style="list-style-type: none"> • Prior to operation activities • Throughout the operations 	Supervisor

Table 8: Action Plan – Groundwater and surface water contamination

Objective:

The objective of the mitigation measures is to prevent negative impacts associated with groundwater and surface water pollution.

Activities / facilities	Technical and management options	Action plan	
		Frequency / target date	Responsible parties
Ablution Facilities	<ul style="list-style-type: none"> • Contractor must provide appropriate ablution facilities for the employees during construction. • Contractor should ensure that toilets are working properly and are clean, so they do not pollute the surrounding environment or create hygiene problems. • All sewerage from the toilets should be in good working order. • Personnel may not relieve themselves in the 	Throughout construction	Supervisor

	surrounding bush <ul style="list-style-type: none"> Stormwater management designs should be included in the design to prevent pooling of water on site 		
Contamination of groundwater/ surface water	<ul style="list-style-type: none"> Refer to “Hydrocarbon and associated spills Management Action plan”. 	Throughout construction and operations	Supervisor

Table 12: Action Plan – Traffic Management

Objective:

The objective of the management measure is to appropriately manage traffic impacts relating to the B2 road users arising from the site access intersecting the B2 road:

Activities / facilities	Technical and management options	Action plan	
		Frequency / target date	Responsible parties
B2 - Site Intersection	Measures relating to the B2 road users arising from the fuel storage access intersecting the B2 road: <ul style="list-style-type: none"> Signage must be implemented to warn motorists of construction activities. Ensure that an Emergency Response Plan is in place, in event of an accident. The Contractor shall prepare a strategy to ensure the disruption to traffic is minimized to acceptable levels. The strategy should include a schedule of work including when and how road crossings (construction at existing intersections) will be made. The Contractor shall also liaise with the Traffic Authorities for their approval in this regard. 	Throughout construction	Supervisor

	<ul style="list-style-type: none"> • Proper traffic and safety warning signs must be placed at the construction site to the satisfaction of the Engineer and the Roads Authority. 		
Contamination of groundwater/ surface water	<ul style="list-style-type: none"> • Refer to “Hydrocarbon and associated spills Management Action plan”. 	Throughout construction and operations	Supervisor

Table 11: Action Plan – Management and Monitoring

Objective:

Activities / facilities	Technical and management options	Action plan	
		Frequency / target date	Responsible parties
Monitoring	<ul style="list-style-type: none"> Benguela shall ensure that all aspects of EMP are implemented during construction and operation. The environmental consultant shall conduct bi-annual site inspection and make provision for reporting on every aspect of the EMP. 	Throughout construction and Operation	Supervisor

To ensure that the provisions of the EMP are implemented during construction and operation.

Table 11: Action Plan – Communication and Stakeholder Consultation

Objective:

- To ensure that all stakeholders are adequately informed throughout operations and that there is effective communication.
- Identification of the stakeholder groups in the project location and analysis of their profiles, interests, issues/impacts and concerns relevant to the project.
- Identification of specific measures to allow meaningful engagement with different stakeholder groups identified in a manner that is transparent and accessible and using culturally appropriate communication methods with a specific focus on the stakeholders with high influence/impact.

Activities / facilities	Technical and management options	Action plan	
		Frequency / target date	Responsible parties

Stakeholder Consultation	<ul style="list-style-type: none"> Benguela shall take responsibility for the implementation for all provisions of this EMP and to liaise between community and the authorities. <p>Initiate an efficient Grievance Mechanism to allow potentially affected individuals to voice their concerns on the project:</p> <ul style="list-style-type: none"> Receive, review, consider and resolve grievances related to the social and environmental aspects of the project. Entertain grievances of indirectly affected persons and/or persons affected during project implementation. Resolve grievances within a period of two weeks at the GRC level and communication of the resolution to the aggrieved party. Sharing of documents, ideas pertaining to development activities. 	Throughout construction and Operation	Supervisor
--------------------------	---	---------------------------------------	------------

Table 11: Action Plan – Communication and Stakeholder Consultation

Objective:

To prevent the destruction and disturbance of hummock species as far as practically possible.

Activities / facilities	Technical and management options	Action plan	
		Frequency / target date	Responsible parties
Destruction of Hummock Species	<ul style="list-style-type: none"> Management will implement a zero tolerance policy concerning the killing or collecting of any plants or animals. This applies to people 	Throughout construction and Operation	Supervisor

	<p>directly employed by Namibia Berries as well as any contractors working on their behalf. Develop a policy that limits independent movements of all workers into the veld that could create suspicion of poaching. Strictly prevent poaching, harvesting or possession of any such wildlife resources without an appropriate permit.</p> <ul style="list-style-type: none"> • Keep destruction of Hummock species to a minimum. Strictly control vehicle and machinery movement in the area where hummocks and individual plants occur. • Ongoing awareness to contractors and Benguela employees (i.e. Regular toolbox talks) should be promoted about the value of biodiversity and the negative impacts of disturbance, especially to lichens and hummocks, as well as the negative impacts of illegal collecting of plants. • Monitor the clearing of vegetation prior to construction to ensure that the requirements stipulated in the EMP are adhered to. • Monitor management adherence to waste management requirement frequently. • Monitor quantities of waste material production, dust and wastewater. 		
--	--	--	--