Updated Environmental Management Plan (EMP) for:

The Operational activities of the Fuel Retail Facility at the Kamanjab Service Station and General Dealer Trust, in Kunene Region, Namibia.

Prepared by:	Prepared for:
Excel Dynamic Solutions (Pty) Ltd	Petrosol

March 2026

DOCUMENT INFORMATION

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Document Version	Updated EMP

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Abbreviation	Meaning
CV	Curriculum Vitae
DEAF	Department of Environmental Affairs and Forestry
EA	Environmental Assessment
EAP	Environmental Assessment Practitioner
ECC	Environmental Clearance Certificate
EDS	Excel Dynamic Solutions
EMA	Environmental Management Act
EMP	Environmental Management Plan
GN	Government Notice
I&APs	Interested and Affected Parties
MEFT	Ministry of Environment, Forestry and Tourism
EPs	Equator Principes
IFC	International Finance Corporation

1. INTRODUCTION

1.1 Project Background

Kamanjab Service Station and General Dealer Trust (the Proponent) constructed and currently operates a fuel retail facility. The company operates at Erf 5, C40 route within the Kamanjab townland, and has been operating for the past seven years. It formerly operated as a Shell station and was recently renovated and rebranded as Petrosol. (refer to **Figure 1**).

The current ECC-0886 (**Appendix A**) for the site has expired in January 2025. To ensure that site activities are conducted in a sustainable and environmentally compliant manner, the Proponent contracted Excel Dynamic Solutions (Pty) Ltd (EDS) to perform the site environmental audit, compiled the EMP, and apply for the ECC renewal on their behalf.

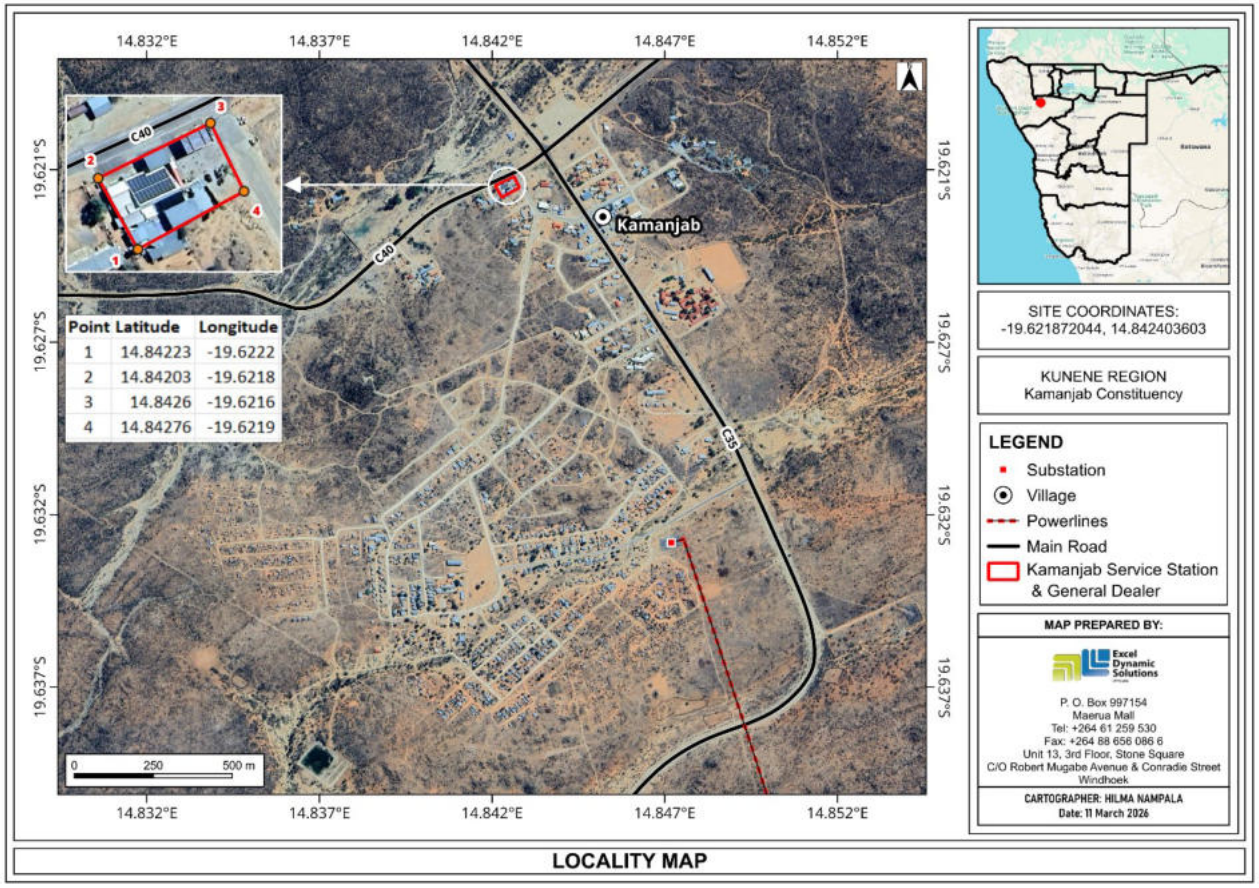

Figure 1: Location of the site

The development project is among the listed activities that may not be undertaken without an Environmental Clearance Certificate (ECC). Therefore, to ensure that the project activities remain compliant with national environmental legislation, which includes having a valid ECC, the Proponent appointed Excel Dynamic Solutions (Pty) Ltd to apply for the ECC renewal on their behalf. The relevant listed activities as per EIA regulations are:

1. **Energy Generation, Transmission and Storage Activities**

- *(c) Refining of gas, oil and petroleum products*

9. Hazardous Substance Treatment, Handling and Storage

- *9.2 Any process or activity which requires a permit, license or other form of authorisation, or the modification of or changes to existing facilities for any process or activity which requires an amendment of an existing permit, license or authorisation or which requires a new permit, license or authorisation in terms of a law governing the generation or release of emissions, pollution, effluent or waste.*
- *9.4 The storage and handling of a dangerous goods, including petrol, diesel, liquid petroleum gas or paraffin, in containers with a combined capacity of more than 30 cubic meters at any one location.*
- *9.5 Construction of filling stations or any other facility for the underground and aboveground storage of dangerous goods, including petrol, diesel, liquid, petroleum, gas or paraffin.*

This document has been prepared as a legal requirement to support the application of renewal of the current ECC, which expired in January 2025, to ensure that the project remains compliant with environmental legislation and to provide sustainability practices on the site.

EDS has lodged and submitted the ECC renewal application. The updated EMP for the ECC renewal will be submitted to the DEAF in the MEFT for the evaluation and consideration of the ECC renewal.

1.2 Aim of the updated Environmental Management Plan (EMP)

Regulation 8(j) of the EIA Regulations (2012) requires that a draft Environmental Management Plan (EMP) shall be included as part of the Environmental Assessment (EA). A '**Management Plan**' is defined as:

> *"…a plan that describes how activities that may have significant environmental effects on the environment are to be mitigated, controlled and monitored."*

An EMP is one of the most important outputs of the EA process. Synthesizes all the proposed mitigation and monitoring actions, set with specific assigned responsibilities. Additionally, it provides a link between the impacts identified in the EA process and the required mitigation measures. It is important to note that an EMP is a statutory document, and a person who contravenes the provisions of this EMP may face imprisonment and/or a fine. This EMP is a living document and can be amended to address project changes/or environmental conditions, and feedback from compliance monitoring.

The purpose of this document is, therefore, to guide environmental management throughout the different phases of the project activities.

2. LEGAL OBLIGATIONS GOVERNING THE PROPOSED ACTIVITIES

The main legal framework presented herein is that of Namibia for the relevant project component under the scope of this document. Detailed legislation applicable to the project is outlined in the EA Report.

The legal requirements provided herein pertain to permits or licenses required of the Proponent and/or the renewal of such permits throughout the operational phase. These legal requirements are provided under **Table 2**.

Table 1: Applicable legal requirements and permits for the activities

Legislation/Policy/ Guideline	Relevant Provisions	Implications for this project
Environmental Management Act EMA (No 7 of 2007)	Requires that projects with significant environmental impacts be subject to an environmental assessment process (Section 27). Details principles which are to guide all EIAs.	An ECC must be renewed every 3 years before its expiry date.
Environmental Impact Assessment (EIA) Regulations GN 28-30 (GG 4878)	Details requirements for public consultation within a given environmental assessment process (GN 30 S21). Details the requirements for what should be included in a Scoping Report (GN 30 S8) and an Assessment Report (GN 30 S15).	

Legislation/Policy/ Guideline	Relevant Provisions	Implications for this project
Petroleum Products and Energy Act (No. 13 of 1990) Regulations (2001)	Regulation 3(2)(b) states that "No person shall possess or store any fuel except under authority of a license or a certificate, excluding a person who possesses or stores such fuel in a quantity of 600 litres or less in any container kept at a place outside a local authority area".	If there is fuel stored or is intended to be stored on site, the relevant petroleum products storage licenses/permits should be obtained from the Petroleum Affairs at the Ministry of Mines and Energy.
Labour Act 11 of 2007 Health and Safety Regulations (HSR) GN 156/1997 (GG 1617).	Adhere to all applicable provisions of the Labour Act and the Health and Safety regulations.	The protection of employees and contractors' labour rights and occupational health safety.
Forestry Act 12 of 2001, Amended Act 13 of 2005	Prohibits the removal of any vegetation within 100 m from a watercourse (Forestry Act S22 (1)). The Act prohibits the removal of and transportation of various protected plant species.	Should there be protected plant species, known to occur within the project boundaries, a Permit should be obtained from the nearest Forestry Office (MEFT) before removal.

Legislation/Policy/ Guideline	Relevant Provisions	Implications for this project
National Heritage Act (Act No. 27 of 2004)	The Act provides for the protection and conservation of places and objects of heritage significance, as well as the registration of such places and objects. Part V, Section 46 of the Act prohibits the removal, damage, alteration, or excavation of heritage sites or remains. Section 48 sets out the procedure for the application and granting of permits, such as those required in the event of damage to a protected site occurring as an inevitable result of development. Part VI. Section 55, Paragraphs 3 and 4 require that any person who discovers an archaeological site should notify the National Heritage Council. Section 51 (3) sets out the requirements for impact assessment. Should any objects of heritage significance be identified during the site clearing and excavations, the work must cease immediately in the affected sites, and the necessary steps must be taken to seek authorization from the Council.	If archaeologically or heritage significant sites are discovered on the site, such must be reported to the National Heritage Council of Namibia for the management of such discoveries.
The National Monuments Act No. 28 of 1969	The Act enables the proclamation of national monuments and protects archaeological sites.	

Legislation/Policy/ Guideline	Relevant Provisions	Implications for this project
Soil Conversation Act No. 78 of 1969	The Act was established to consolidate and amend the law relating to the combating and prevention of soil erosion, the conservation, improvement, and manner of use of soil and vegetation, and the protection of water sources.	Soils should be conserved and measures to prevent or minimise erosion and pollution during operations should be implemented.
Public Health Act No. 36 of 1919	Section 119 states that "no person shall cause a nuisance or shall suffer to exist on any land or premises owned or occupied by him or which he is in charge any nuisance or other condition liable to be injurious or dangerous to health."	The Proponent must ensure compliance with the provisions of these legal instruments.
Health and Safety Regulations GN 156/1997 (GG 1617)	Details various requirements regarding the health and safety of laborers.	
Public and Environmental Health Act No. 1 of 2015	To provide a framework for a structured, uniform public and environmental health system in Namibia, and to provide for incidental matters.	

2.1 APPLICABLE INTERNATIONAL STANDARDS, TREATIES, CONVENTIONS AND POLICIES

The applicable international standards, treaties, conventions and policies for the project are listed in **Table 3** below.

Table 2: International Policies, Principles, Standards, Treaties and Conventions applicable to the project

Statute	Provisions	Project Implications
Equator Principles	A financial industry benchmark for determining, assessing, and managing environmental and social risk in projects (August 2013). The Equator Principles have been developed in conjunction with the International Finance Corporation (IFC) to establish an International Standard with which companies must comply to apply for approved funding by Equator Principles Financial Institutions (EPFIs). The principles apply to all new project financings globally across all sectors. Principle 1: Review and Categorisation Principle 2: Environmental and Social Assessment Principle 3: Applicable Environmental and Social Standards Principle 4: Environmental and Social Management System and Equator Principles Action Plan Principle 5: Stakeholder Engagement Principle 6: Grievance Mechanism Principle 7: Independent Review Principle 8: Covenants Principle 9: Independent Monitoring and Reporting Principle 10: Reporting and Transparency	These principles are an attempt to: '…encourage the development of socially responsible projects, which subscribe to appropriately responsible environmental management practices with a minimum negative impact on project-affected ecosystems and community-based upliftment and empowering interactions.'
The International Finance Corporation (IFC) Performance Standards	The International Finance Corporation's (IFC) Sustainability Framework articulates the Corporation's strategic commitment to sustainable development and is an integral part of the IFC's	The Performance Standards are directed toward clients, guiding how to identify risks and impacts, and are designed to

	approach to risk management. The Sustainability Framework comprises IFC's Policy and Performance Standards on Environmental and Social Sustainability, and IFC's Access to Information Policy. The Policy on Environmental and Social Sustainability outlines IFC's commitments, roles, and responsibilities in relation to environmental and social sustainability. As of 28 October 2018, there are ten (10) Performance Standards (Performance Standards on Environmental and Social Sustainability) that the IFC requires project Proponents to meet throughout the life of an investment. These standard requirements are briefly described below. Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts Performance Standard 2: Labour and Working Conditions Performance Standard 3: Resource Efficient and Pollution Prevention and Management Performance Standard 4: Community Health and Safety Performance Standard 5: Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement Performance Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources Performance Standard 7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities Performance Standard 8: Cultural Heritage Performance Standard 9: Financial Intermediaries (FIs)	help avoid, mitigate, and manage risks and impacts as a way of doing business sustainably, including stakeholder engagement and disclosure obligations of the Client (Borrower) concerning project-level activities. In the case of its direct investments (including project and corporate finance provided through financial intermediaries), IFC requires its clients to apply the Performance Standards to manage environmental and social risks and impacts so that development opportunities are enhanced. IFC utilises the Sustainability Framework, along with other strategies, policies, and initiatives, to guide the business activities of the Corporation in achieving its overall development objectives.

	Performance Standard 10: Stakeholder Engagement and Information A full description of the IFC Standards can be obtained from http://www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-standards?cq_ck=1522164538151#ess1	
The United Nations Convention to Combat Desertification (UNCCD) 1992	Addresses land degradation in arid regions to contribute to the conservation and sustainable use of biodiversity, as well as mitigating climate change. The objective of the convention is to forge a global partnership to reverse and prevent desertification/land degradation, and to mitigate the effects of drought in affected areas, thereby supporting poverty reduction and environmental sustainability. United Nations Convention.	The project activities should not contribute to desertification.
Convention on Biological Diversity 1992	Regulate or manage biological resources important for conserving biological diversity, whether within or outside protected areas, to ensure their conservation and sustainable use. Promote the protection of ecosystems and natural habitats, as well as the maintenance of viable populations of species in their natural surroundings.	Removal of vegetation cover and destruction of natural habitats should be avoided, and where not possible, minimised.
Stockholm Declaration on the Human Environment, Stockholm (1972)	It recognizes the need for: “a common outlook and common principles to inspire and guide the people of the world in the preservation and enhancement of the human environment.	Protection of natural resources and prevention of any form of pollution.

2.3 EMP IMPLEMENTATION, ROLES AND RESPONSIBILITIES

The Proponent is ultimately responsible for implementing the EMP. However, the Proponent may delegate this responsibility at any time, as they deem necessary during the project phases. The roles and responsibilities of all delegates/parties involved in the effective implementation of this EMP are set out in **Table 4** Below:

Table 3: The persons and institutions responsible for the Implementation of the Draft EMP

Role (Person and or Institution)	Responsibilities
Kamanjab Service Station and General Dealer Trust (The Proponent)	-Managing the implementation of this EMP, updating and maintaining it when necessary. -Management and monitoring of individuals and/ or equipment on-site in terms of compliance with this EMP and issuing fines for contravening EMP provisions.
Site Manager	This individual will be responsible for ensuring that the project's operational activities are completed on time. The Manager's duties and responsibilities will include: -Ensure that relevant commitments contained in the EMP Action Plans are adhered to. -Ensure relevant staff are trained in procedures entailed in their duties. -Maintain records of all relevant environmental documentation for the project. -Reviewing the EMP annually and amending the document when necessary. -Issuing fines to individuals who may be in breach of the EMP provisions and, if necessary, removing such individuals from the site. -Cooperate with all relevant interested and affected parties/stakeholders. -Development and management of schedules for daily activities
Environmental Control Officer (ECO) or Safety, Health & Environmental (SHE) Officer	The SHE or ECO (as appropriate) is responsible for ensuring that project activities are completed on time, efficiently and sustainably. The ECO/SHE Officer's duties and responsibilities include: -Management and facilitation of communication between the Proponent, PR and Interested and Affected Parties (I&APs) regarding this EMP. -Conducting site inspections of all areas with respect to the implementation of this EMP (monitor and audit the implementation of the EMP).

Role (Person and or Institution)	Responsibilities
	-Advising the Proponent Site Manager on the removal of person(s) and/or equipment not complying with the provisions of this EMP. -Making recommendations to the PR with respect to the issuing of fines for contraventions of the EMP. -Undertaking an annual review of the EMP and recommending additions and/or changes to this document.
Public Relations Officer (PRO)	The PRO will be responsible for the following tasks: -Liaising between the affected landowners, communities and the Proponent. -Ensure effective communication with stakeholders, local communities, media (if necessary) and the public. -Organising and overseeing public relations activities, managing public relations issues. -Preparing and submitting public relations reports, if required. -Collaborating with personnel and maintaining project-related open communication among personnel.
Other responsibilities include Archaeology: Chance Finds Procedure (CFP) Implementation Roles	A. Operator: Exercise due caution if archaeological remains are found B. Site Manager and ECO: Secure the site and advise management timeously C. Archaeologist: Inspect, identify, advise management, and recover remains.

3. ENVIRONMENTAL MANAGEMENT ACTION PLANS

3.1 Key Potential Negative Impacts

The potential impacts anticipated for the operations onsite are listed below. Mitigation measures or management action plans were also made for the negative impacts to maximize the positive ones. The impacts that had been identified and managed on site are as follows.

Positive impacts:

- Employment opportunities and skills transfer,
- Contribution to local and national economies,
- Generation of renewable energy

Negative impacts:

- Risk of fire (accidental fire outbreaks)
- Waste generation
- Dust,
- Soil and water resources contamination,
- Impact on Fauna and Flora,
- Visual impact,
- Vehicular impact,
- Health, safety & security
- Grievances,
- Heritage impact

The features and aspects of these impacts and mitigation measures as identified in the initial EMP have been updated in this version.

3.2 The Updated Management and Mitigation of Potential Key Negative Impacts

The management and mitigation measures for the potential negative impacts are presented in **Table 5**

Table 4: Environmental and Mitigation Measures for the operational and Maintenance phase

Aspect	nature	Management and Mitigation Measure(s)	Responsible Person	Key Performance Indicator (KPI)
Emp and training implementation	EMP required licenses, agreements and permits	-Ensure that the contents of the EMP are understood by the contractor, subcontractors, employees, and all personnel who will be present on site. -Apply for the necessary permits or licenses from the various authorities or ministries that govern the operations of the project.	- Proponent	-All contracts, permits, certificates, and other legal documents must be obtained.
Fires	Outbreak of accidental fires	-The holistic fire protection and prevention plan should still be utilized onsite. -Experience has shown that the best chance to put out a major fire rapidly is in the first 5 minutes. It is essential to recognize that a responsive fire prevention plan encompasses not only the availability of firefighting equipment, but more importantly, it involves proactive measures and activities to prevent, mitigate, and avoid conditions that may lead to fires. -The site must be equipped with sufficient firefighting resources. Regular surveys of the firefighting equipment must be carried out.	- Proponent, -SHE/ECO,	-Any incidents reported are recorded together with the steps taken to mitigate the impacts. -Fire extinguisher serviced as recommended by the manufacturer.

Aspect	nature	Management and Mitigation Measure(s)	Responsible Person	Key Performance Indicator (KPI)
Waste generation	-The ability of the product to act as a waste which must be cleaned up, and soil that has been polluted on site by hydrocarbons must be treated as hazardous waste.	- Waste generated on site must be recycled. - All waste must be disposed of at an approved landfill or facility. - Bins with appropriate labels must be present on site. -The site should have a site ablution facility for the security guard usage and also for visitors and all workers to use, to ensure that waste sewage management is maintained on site.	-SHE/ECO	- Regularly conduct waste inspections on site, -Weekly disposal of waste from the site to the appropriate landfill. -A checklist of waste disposal must be maintained on site.
Soil and Water resources	Accidental spills of fuel and other chemicals used on-site may occur.	-Any fuel spills detected on site must be reported, and remediation action must be taken accordingly. -Any soils contaminated by hydrocarbon on site must be carefully	- Site Manager - All project workers	- Reports for all hydrocarbon leaks on site are conducted by the Health and Safety Officer onsite.

Aspect	nature	Management and Mitigation Measure(s)	Responsible Person	Key Performance Indicator (KPI)
		removed, transported, and disposed of at an appropriate site. -All workers on site must be trained on how to handle soil and water waste, to reduce the impacts. -Soil pollution must be prevented on site to ensure that contaminants do not affect the groundwater resources around the project area. -Existing tracks must be used to minimize the footprints on the already sensitive soils on site.		
Grievance	Possible grievances of the surrounding and community members regarding the project implementation	-A grievance register must be kept on site, and all meeting minutes must be recorded and archived. -Communication regarding the project progress and maintenance should be provided to the owners, from whom the Proponent is leasing the land.	- Site Manager	- A grievance register book must be present on site. -Any grievance is resolved and recorded accordingly.

Aspect	**nature**	**Management and Mitigation Measure(s)**	**Responsible Person**	**Key Performance Indicator (KPI)**
Visual Impact	This has an impact on the aesthetic appearance of the site.	-The site must be tidily kept.	- Site Manager - All project workers	-A Compliant register must be kept on site.
Heritage Impact	-Archaeological significance might be discovered on site.	- If any archaeological significances are discovered on site, such a discovery must be reported to the National Heritage Council of Namibia to advise the Proponent on how to handle such archaeological significance and for the issuance of a permit for archaeological conservation. -The site manager must be trained on the importance of archaeology significance.	-Site Manager	-A register book for any possible discovery must be present on site.

Aspect	nature	Management and Mitigation Measure(s)	Responsible Person	Key Performance Indicator (KPI)
Health, Safety and Security	Handling machines or equipment can cause injuries.	-No unauthorized people should be allowed on site. -Workers must be provided with appropriate PPE. -A Health and safety management system must be implemented on-site to manage all health and safety-related issues. -Appropriate signage and warnings should be erected on site.	- SHE/ECO -Site Manager	- A health, safety and security register must be kept on site to record any near misses, accidents, and incidents that have occurred on site.
Vehicular impacts	The site is located within the Kamanjab townland, which leads; project vehicles might have an impact on the traffic on the main road.	-All project drivers must have a valid driver's license. -No person under the influence of alcohol will be allowed to operate any project vehicle. -No person with a serious health condition will be allowed to drive. - A proper traffic management plan must be in place.	Site Manager	-Any complaint received regarding traffic issues should be recorded and action must be taken accordingly according to the complaint.

3.3 Environmental and Social Management Action

The updated EMP is responsible for monitoring the environmental and social indicators associated with the project. This is to ensure that EMP measures are clearly outlined and that all involved parties are engaged in the project cycle. The environmental and social measures and actions are enforced to comply with the activities governed by applicable national legislations and to mitigate adverse impacts.

3.4 Monitoring of EMP Implementation and ECC Renewal

The annual environmental monitoring compliance of the EMP implementation must be undertaken throughout the project cycle. The Proponent must maintain an Environmental Impact Indicator Checklist, which must be used by the ECO and updated as necessary.

4. Recommendations and Conclusions

EDS acknowledges that the Proponent has been compliant with the ECC conditions and implementation of the EMP onsite, as well as the undertaking of bi-annual environmental reporting. EDS hereby recommends that the current ECC be renewed so that the Proponent can continue with the project activities. The site is generally well-kept, and the EMP is adhered to. It is therefore recommended that the project be granted an ECC, provided that:

- All licenses and approvals for the project activities are obtained as required.
- All mitigation measures provided by the EMP are effectively implemented on site.
- The Proponent and all contractors must ensure that Namibian and international regulations governing the solar project are adhered to.
- The proponent should ensure that EMP compliance monitoring is conducted, and must ensure that ECC renewals are submitted on time to MEFT.

Appendix A: Copy of the Current ECC

Appendix B: Archaeology Chance Find Procedure

CHANCE FINDS PROCEDURE (AFTER KINAHAN, 2020)

Areas of proposed development activity are subject to heritage survey and assessment at the planning stage. These surveys are based solely on surface indications, and it is therefore possible that sites or items of heritage significance may be discovered during development work. The procedure set out here covers the reporting and management of such finds.

Scope: The "*chance finds*" procedure covers the actions to be taken from the discovery of a heritage site or item to its investigation and assessment by a trained archaeologist or other appropriately qualified person.

Compliance: The "chance finds" procedure is intended to ensure compliance with relevant provisions of the National Heritage Act (27 of 2004), especially Section 55 (4): "*a person who discovers any archaeological …. Object ……must as soon as practicable report the discovery to the Council*". The procedure of reporting set out below must be observed so that heritage remains reported to the NHC are correctly identified in the field. Manager/Supervisor must report the findings to the following competent authorities:

- National Heritage Council of Namibia (061 244 375 / Technical Office +264 61 301 903)
- National Museum (061 276800),
- National Forensic Laboratory (061 240461).

Archaeological material must NOT be touched. Tampering with the materials is an offence under the Heritage Act and punishable upon conviction by the law.

Responsibility:

Operator:	To exercise due caution if archaeological remains are found
Foreman:	To secure the site and advise management timeously
Superintendent:	To determine the safe working boundary and request an inspection
Archaeologist:	To inspect, identify, advise management, and recover remains

Procedure:

Action by a person identifying archaeological or heritage material:

a) If operating machinery or equipment, stop work

b) Identify the site with flag tape

c) Determine GPS position if possible

d) Report findings to the foreman

Action by the foreman

a) Report findings, site location and actions taken to the superintendent

b) Cease any works in the immediate vicinity

Action by the superintendent

a) Visit the site and determine whether work can proceed without damage to findings

b) Determine and mark the exclusion boundary

c) Site location and details to be added to the project GIS for field confirmation by the archaeologist

Action by an Archaeologist

a) Inspect the site and confirm the addition to the project GIS

b) Advise NHC and request written permission to remove findings from the work area

c) Recovery, packaging and labelling of findings for transfer to the National Museum

In the event of discovering human remains

a) Actions as above

b) Field inspection by an archaeologist to confirm that the remains are human

c) Advise and liaise with NHC and Police

d) Recovery of remains and removal to the National Museum or the National Forensic Laboratory, as directed.

ECC – 01886

Serial: 5ujIIU1886

REPUBLIC OF NAMIBIA

MINISTRY OF ENVIRONMENT, FORESTRY AND TOURISM

OFFICE OF THE ENVIRONMENTAL COMMISSIONER

ENVIRONMENTAL CLEARANCE CERTIFICATE

ISSUED

In accordance with Section 37(2) of the Environmental Management Act (Act No. 7 of 2007)

TO

Kamanjab Service Station & General Dealer Trust.
P. O. Box 8313, Swakopmund.

TO UNDERTAKE THE FOLLOWING LISTED ACTIVITY

The Operations and Management of the Kamanjab Service Station & General Dealer Trust in the Kunene Region.

MINISTRY OF ENVIRONMENT, FORESTRY AND TOURISM
Private Bag 13306
WINDHOEK NAMIBIA
21 JAN 2022
ENVIRONMENTAL COMMISSIONER

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