ENVIRONMENTAL MANAGEMENT PLAN

(EMP)

To Support an Application for an **Environmental Clearance Certificate** (ECC)
for the Operation of an **Existing** Fuel Retail Outlet and Related Amenities

Mirabilis Service Station

Erf 2279 Khorixas Proper

KHORIXAS

THE PROPONENT

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Erf 2279 Khorixas Proper
KHORIXAS

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FINAL REPORT

APP007412

April 2026

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INFORMATION SHEET	
Project Title Name	An Environmental Management Plan (EMP) Report in Support of an Application for an **Environmental Clearance Certificate** (ECC) to Permit the Operation of an **Existing** Fuel Retail Outlet and Related Amenities Erf 2279, Khorixas Proper Khorixas Kunene Region
MEFT Application No.	APP007412
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ABBREVIATIONS AND ACRONYMS

Acronym	Expansion
ADO	Automobile Diesel Oil
CENORED	Central Northern Regional Electricity Distributor
EC	Environmental Commissioner
ECC	Environmental Clearance Certificate
EIA	Environmental Impact Assessment
EMA	Environmental Management Act (Act No. 7 of 2007)
EMP	Environmental Management Plan
EMS	Environmental Management System
FRO	Fuel Retail Outlet
FSM	Fuel Service Manager
HDPE	High Density Polyethylene
IAPs	Interested and Affected Parties
KRC	Kunene Regional Council
KTC	Khorixas Town Council
MEFT	Ministry of Environment, Forestry and Tourism
MIME	Ministry of Industries, Mines and Energy
MSDS	Material Safety Data Sheet
MSS	Mirabilis Service Station
NamRA	Namibia Revenue Authority
NSI	Namibia Standards Institute
OEC	Office of the Environmental Commissioner
PC	Petroleum Commissioner
PPE	Personal Protective Equipment
SANS	South African National Standards
SME	Small and Medium Enterprises
SSC	Social Security Commission
ULP	Unleaded Petrol
USTs	Underground Storage Tank(s)
VOC	Vapour Organic Compounds
WHO	World Health Organisation

DEFINITION OF TERMS

TERM	EXPANSION
Alternatives	Alternatives are different ways to achieve the same project objective, including options for location, design, technology, or scale, along with a 'no-action' alternative.
Construction Phase	The phase of a project which precedes the operational phase, during which project facilities and infrastructure are assembled and installed on their foundations, and connected and tested, to ensure that they operate as designed.
Cumulative Impacts	In relation to a project activity, means how the combined effects /impacts of a particular project interact and accumulate over time and space with other past, present or future actions to affect an ecosystem or community.
Emergency Plan	A plan in writing that on the basis of identified potential incidents at the installation together with their consequences, describes how such incidents, and their consequences should be dealt with, both on site and off site.
Environment	As defined in the Environmental Management Act means the complex of natural and anthropogenic factors and elements that are naturally interrelated and affect the ecological equilibrium and the quality of life, including – (a) the natural environment that is land, water, and air, all organic and inorganic matter and living organism and - (b) the human environment that is the landscape and the natural, cultural, historical, aesthetic, economic and social heritage and values.
Environmental Component/Aspect	An attribute or constituent of the environment (i.e. air quality; waste management, seismicity, soil, groundwater; terrestrial ecology, noise, traffic, socio-economic) that may be impacted by the proposed project.
Environmental Impact	A description of the potential effect or consequence of an aspect of the development on a specified component of the biophysical, social or economic environment within a defined time and space.
Environmental Management Plan (EMP)	A working document which contains site specific plans to ensure that environmental management practices to eliminate and control environmental impacts are followed during the developmental phases of that site, project and or facility and would normally consist of construction phase, operational phase and decommissioning phases.
Environmental Monitoring	Means collection, evaluation and summarization of environmental data by continuous or periodic monitoring of certain qualitative and quantitate indicators characterizing the state of environmental components and their modification as a result of the impact of natural and anthropogenic factors.
Hazardous Waste	Any waste that contains organic or inorganic elements or compounds that may, owing to the inherent physical, chemical or toxicological characteristics of that waste, have detrimental impact on health and the environment.
Industrial Waste	Means waste generated as a result of business, commerce, trade, wholesale, retail, professional, manufacturing, maintenance, repair, fabricating, processing or dismantling activities, but does not include domestic waste, garden or bulky waste, builders' waste or health care risk waste.
Interested and Affected Parties	All persons who may be affected by the project either directly or indirectly, or who have an interest or stake in the area to be affected by the project, including neighbouring landowners & Road Fund Administration.
Material Safety Data Sheet	According to ISO 11014, a material safety data sheet (MSDS) is a document that contains information on the potential health effects of exposure to chemicals, or other potentially dangerous substances and on safe working procedures when handling chemical products. It is an essential starting point for development of a complete health and safety program. It contains hazard evaluations on the use, storage, handling and emergency procedures related to that material. The MSDS contains much more information about the material than the label and it is prepared by the supplier. It is intended to tell what the hazard of the product are, how to use the product safely, what to expect if the recommendations are not followed, what to do if accidents occur, how to recognize symptoms of overexposure and what to do if such incidents occur.
Mitigation	Measures designed to avoid, reduce or remedy adverse impacts.

Non-compliance	Issues that are in direct non-compliance with the requirements, commitments and/or management measures as approved in the EMP.
Operational Phase	The phase of a project during which the newly constructed facility/tanks, pipelines, gantries and associated facilities are operated.
Proponent	An organisation (private or public) or an individual who intends to implement a development proposal. As defined in the Environmental Management Act, the proponent is a person who proposes to undertake a listed activity.
Risk	Risk is the measure of the consequence of a hazard and the frequency with which it is likely to occur. Risk is expressed mathematically as: Risk = Consequence x Frequency of Occurrence.
Risk Assessment	The risk assessment is the process of collecting, organising, analysing, interpreting, communicating and implementing information in order to identify the probable frequency, magnitude and nature of any major incident which could occur at a major hazard installation, and the measures required to remove, reduce or control the potential causes of such an incident.
Scoping	The preliminary stage during which key environmental issues and impacts of a proposed project are defined. It involves identifying potential effects, deciding which topics need further assessment, and outlining the methodology for the assessment to focus the study on the most significant environmental issues and reduce uncertainty. The results of a scoping are frequently used to prepare Terms of Reference for the specialized input into the full EIA.
Sensitive Area	An area or environment where a unique ecosystem, habitat for plant and animal life, wetlands or conservation activity exists or where there is high potential for ecotourism
Significance Impact	Means an impact that by its magnitude, duration, intensity or probability of occurrence may have a notable effect on one or more aspects of the environment.
Stakeholder	Stakeholders are divided into two classes – statutory stakeholders (i.e. MEFT, Ministry of Labour, etc. and non-statutory stakeholders who could be interested and affected parties (IAPs). IAPs could be those public members whose interests may be positively or negatively affected by the project and/or who are concerned with the project/activities and its consequences.

1. BACKGROUND

1.1 Introduction

This Environmental Management Plan (EMP) has been prepared to support an application for consideration to grant an Environmental Clearance Certificate (ECC) in terms of the provisions of the Environmental Management Act and EIA Regulations. The application is submitted to the Office of the Environmental Commissioner (OEC) in the Ministry of Environment, Forestry and Tourism (MEFT) for the consideration of the Environmental Commissioner (EC).

The applicant of the ECC is Mirabilis Service Station CC ('**MSS'**, for short) who has been operating a Fuel Retail Outlet (FRO) situated at Erf 2279, in the Khorixas local authority. MSS has been in operation for a number of years supplying diesel and unleaded petrol to the motoring public of Khorixas, tourists passing through the town as well as to the surrounding farming community. The FRO has been supplied by Engen Namibia as its appointed bulk fuel wholesaler.

Following Vivo Energy's acquisition of Engen Namibia, MSS has chosen Bachmus Oil and Fuel Supplies ('**Bachmus'**) as its bulk fuel supplier. Bachmus (trading as Caltex Namibia), entered into a licensing agreement with Chevron and launched its first Caltex-branded station in the country in May 2025.

During the due diligence process conducted by Bachmus, it was discovered that MSS was operating without an ECC. Accordingly, it is the intention of the applicant to rectify this unfortunate oversight without delay, and Ekwao Consulting was appointed to facilitate its ECC application process with OEC.

The EMP is therefore prepared to serve two purposes:

- Firstly, to support the application for an ECC to allow the realignment and compliance of the operational activities of MSS's **existing** FRO with the provisions of EMA, the EIA regulations as per GG No. 4878 of February 2012.

- Secondly, to serve as an environmental management tool for use by the management of the FRO to prevent or reasonably avoid adverse environmental impacts, and to enhance the positive environmental benefits associated with the operational activities of the aforesaid FRO. In the EMP, measures have been described that need to be taken to ensure that Duty of Care is bestowed upon those who cause or have caused or may in future cause pollution or degradation of the environment, as outlined in the provisions of EMA.

1.2 Listed Activity

In terms of EMA and EIA regulations the activity conducted by MSS is listed in Section 9 of the EIA Regulations as more represented in **Table 1** below:

Table 1: Listed Activity Applicable to the Activity

Listed Activity	Relevancy to Project
Main Category : Hazardous Substances – Treatment, Handling and Storage	
9.1 The manufacturing, storage, handling or processing of a hazardous substance defined in the Hazardous Substances Ordinance, 1974.	Fuel is considered a hazardous material and dangerous good due to its high flammability and potential health risks.
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.	A Fuel Retail Licence is granted by the line ministry. The applicant is compliant in that a FRL has been granted (Licence No. R/5/2022, attached in **Appendix B**)
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 anyone location.	Petrol and diesel are the core products stored and handled
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.	The construction of the facility was done prior to the enactment of EMA. The application is intended to realign and achieve compliance with the provisions of EMA

After consulting with OEC on the application for MSS's ECC, a screening notice was issued indicating that an EMP for the FRO should be prepared. The application was allocated the number of **APP007412.** In addition, written notifications for the ECC application were to be made to local authority (Khorixas Town Council) as well as to the neighbouring residents/businesses. Notifications made are attached as **Appendix E.**

1.3 Compliance with other Applicable Regulations

The applicant is in compliance with the regulations/laws presented in **Table 2** below:

Table 2: Compliance with Applicable Legislations/Laws

Applicable Regulations /Law	Documentary Evidence
All businesses operating within the boundaries of a local authority are required to be registered by the local authority. The applicant has been registered as a business with the Khorixas Town Council	Attached to the EMP report as **Appendix A**
A Fitness Certificate for the FRO has been granted to the applicant by the KTC which confirms compliance with local authority bylaws.	Attached to the EMP report as **Appendix B**
A Fuel Retail Licence has been issued to the applicant by the Ministry of Industries, Mines and Energy (MIME) in terms of the provisions of the Petroleum Products Regulations and Petroleum Products and Energy Act.	Attached to the EMP report as **Appendix C**
The applicant is also compliant with the provisions of the Social Security Act as evidenced by its Registration Certificate No. 30169817 provided to the EIA Consultant by the applicant.	Attached to the EMP report as **Appendix D**

1.4 Rationale for the EMP

The rationale of an EMP is to translate the findings of the environmental assessment into action, providing a roadmap on how to manage negative impacts (mitigate or rehabilitate) and to enhance positive impacts associated with the implementation of the project. The EMP ensures that compliance with applicable laws is maintained throughout the various phases of the project - design, construction, operation, and decommissioning.

The aim of an EIA is to protect the environment by ensuring that the OEC, when deciding whether to grant an ECC, does so with all the details of the likely significant effects on the environment, and takes these into account in the decision-making process.

In terms of EMA, the environment is defined as the complex of natural and anthropogenic factors and elements that are naturally interrelated and affect the ecological equilibrium and the quality of life, including:

- The natural environment that is land, water, and air, all organic and inorganic matter and living organisms; and
- The human environment that is the landscape and the natural, cultural, historical, aesthetic, economic and social heritage and values.

1.5 Objectives of the EMP

This EMP is to serve as a standalone onsite source document focusing on the operational phase - the business phase of the FRO including any renovations and routine maintenance that may be required from time to time — as well as the decommissioning phase should it become necessary.

In this regard, the EMP is to serve as a tool aimed at taking pro-active actions, by addressing potential problems before such problems actually occur. Amongst the goals and objectives of this EMP are therefore to:

- Avoid, minimise or correct disturbance of the ecosystems and loss of biodiversity.
- Avoid, minimise or correct pollution and degradation of the environment.
- Avoid or minimise waste, reuse or recycle waste where possible, and to dispose of waste in a responsible manner.

- Apply a risk-averse and cautious approach.
- Anticipate and prevent negative impacts on the environment and on people's environmental rights. Where impacts cannot be prevented, such impacts must be minimised and mitigated.
- Maintain a high standard of housekeeping practices and general neatness of the facility throughout its operational lifecycle.

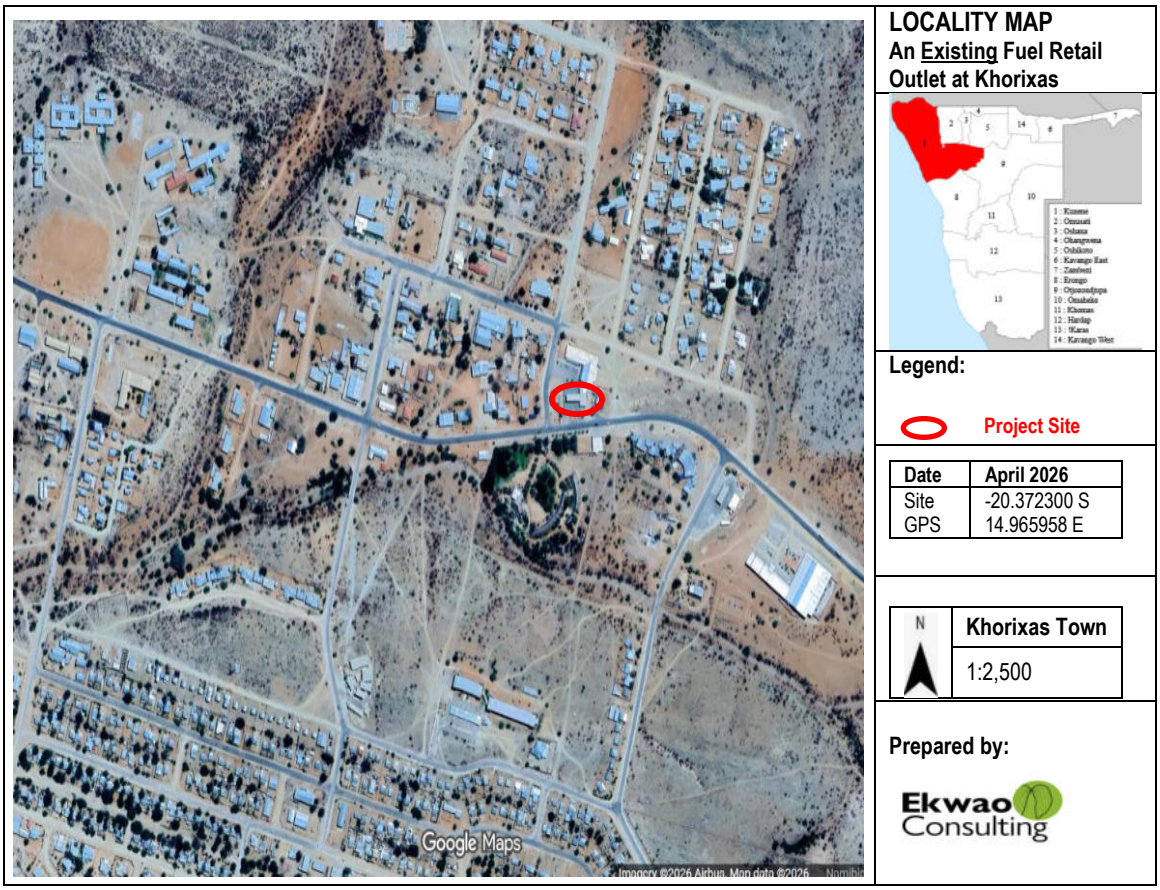

Figure 1: Project Site – Google Earth Image

Figure 2: FRO seen from North to South

Figure 3: FRO seen from South to North

Figure 4: View to the West from the FRO Entrance

Figure 5: View to the East from the FRO Entrance

2 DESCRIPTION OF THE DEVELOPMENT

2.1 Location of the FRO

The FRO operated by MSS is located on Erf 2279, Khorixas Proper, Khorixas, within the jurisdiction of the Khorixas Town Council, as more or less depicted on the Google Earth image attached in Figure 1.

The site is situated in the town of Khorixas, the administrative capital of the Kunene Region and a key transit town on the route between Windhoek and the Kaokoveld/Etosha North. Khorixas lies approximately 500 km north-west of Windhoek. The FRO is therefore strategically located to serve both the local community and through-traffic on this important regional corridor.

2.2 The Development Footprint

The information in this section was obtained from the Service Station Manager, Mr. Panduleni Nangolo and staff personnel of the FRO as well as from site inspection and surveillance. The facility has an overhead canopy and a set of pumps installed on an island. The pumps are connected to a network of pipelines and electrical wiring to facilitate the dispensing of fuel.

Standard items such as spill control infrastructure and vent pipes to allow the release of pressure from USTs, preventing the risk of explosion or tank rupture, have been installed and are functional. The fuel storage capacity of the site is presented in **Table 3.**

Table 3: The Fuel Storage Capacity of the FRO

Underground Storage Tanks (USTs)	Product	Capacity (Litres)
UST #1	Automobile Diesel (ADO) — 10 ppm & 50 ppm	23 000
UST #2		23 000
Total ADO		**46 000**
UST #3	Unleaded Petrol (ULP)	23 000
UST #4		23 000
Total ULP		**46 000**
TOTAL FUEL STORAGE CAPACITY FOR THE SITE		**92 000**

The FRO applies a forecourt management system which ensures the following:

- Spill and overflow controls
- Leak detection and response
- Tank integrity and equipment (pump) testing is done in accordance with the maintenance schedule
- Fire protection includes an electronic shut-off system and fire extinguishers

MSS promotes itself as a one-stop facility offering an array of services which include:

- Takeaway
- 24/7 Fuel – ADO and ULP;
- Additives;
- Lubricants;
- Tyre repairs;
- Car wash;
- Clean restrooms and showers.

Figure 6: Pumps under a canopy and on an elevated Island

Figure 7: Waste Bins and Cleaning Equipment

Figure 8: USTs two per ULP and ADO

Figure 9: Fuel Receiving Points from Road Tankers

2.3 Existing Support Services or Facilities

2.3.1 Waste Facilities

General waste from the FRO is collected by the Khorixas Town Council for transfer to its landfill site. Hazardous waste (which includes oil waste such as rags, oil cans, soiled tissues, oily filters, etc.) is collected by a registered hazardous waste transporter. Waste is disposed of either by selling to a recycling company or by disposal at a licensed hazardous landfill facility.

2.3.2 Potable Water

KTC is responsible for supplying potable water to its residents including the maintenance of water infrastructure. KTC purchases bulk potable water from Namwater, the national water utility to supply the town. Water is transported from Braufels to Khorixas.

2.3.3 Sewerage

The site is connected to the sewerage reticulation system of KTC who are responsible for all maintenance.

2.3.4 Electricity

CENORED is responsible for electricity supply in the Khorixas area, including critical infrastructure like the boreholes in the districts. NamPower is involved in providing the high-voltage supply lines, including those for the 11kV Fransfontein network and the 33kV Palmwag network. The site can reduce its electricity bill by making use of solar energy.

Electricity at the site is provided by the regional electricity distributor serving the Kunene Region.

2.3.5 Access

The site has a single frontage to the main road – the C39 route which runs through Khorixas and is accessed from there. The forecourt includes pump islands, a canopy, and a convenience shop/amenities. The site is located at Erf 2279 within the formal urban area of Khorixas.

2.3.6 Stormwater

Khorixas is situated in a semi-arid environment and receives relatively low annual rainfall. Provision for managing surface runoff and cleaning water has been made during the construction of the facility. Contaminated water from the pump islands enters a channel constructed on all sides of the island with drainage leading to an oil/water separator. The sludge is treated as hazardous waste and removed from the site by a registered third-party hazardous waste contractor.

2.4 Maintenance of the Tanks

The following pollution prevention measures were noted on site:

- Cleaning of oil separator tanks is undertaken at regular intervals by a third party. During cleaning, water contaminated with oil and sludge is pumped out for safe disposal at a registered waste disposal facility.
- The site uses a leak detection system. In addition, daily dip readings of UST levels are conducted to detect any unexplained losses.
- Tank integrity tests are conducted in accordance with the SANS specifications and regulatory requirements.

3 REGULATORY FRAMEWORK

For development to take place on a sustainable basis, government has formulated laws, rules and policies that require the implementation of all projects considered to have an adverse impact on the environment to be preceded by an environmental assessment. Applicable legislations and regulations are presented in **Table 4** while standards and relevant multilateral agreements are presented in **Table 5**.

Table 4: Applicable Legislations and Regulations

Legislation	Main Aspects	Applicability /Relevance
The Constitution of Namibia	• Supreme law of the land. • Encourages the welfare of the people. • Provides for environmental protection. • Recognizes international agreements and corporations.	The State is mandated to promote the welfare of the people and to make laws that preserve the environment for the present and future generations.
Environmental Management Act (Act. No. 7 of 2007)	• Provides for the definition of the environment. • Promotes and encourages sustainable management of the environment when natural resources are exploited/extracted for the benefit of the residents/citizens. • Provides for a process of assessment and control of activities that are likely to pose significant effects on the receiving environment.	The emphasis is on sustainable management of the environment and the use of natural resources.
Environmental Management Regulations (GG No. 4847 of February 2012)	• Heralded the implementation of the EMA almost five years after the Act was approved by the legislature; • Presents a list of activities that require an ECC prior to commencement, and • Regulates and provides guidelines on how EIAs must be conducted.	A list of activities which may not be undertaken without an ECC have been provided.
Petroleum Products Regulations and Petroleum Products and Energy Act (GG Notice 2000)	The Act regulates the licensing and certification of fuel outlets including related facilities such as FROs, LGP bottling plants, etc. **Section 3 (1)** states that (1) No person shall • operate a retail outlet or conduct the business of a wholesaler, unless authorised to do so under a retail license or wholesale license; • operate a consumer installation, unless authorised to do so under a certificate, and • Shall possess or store any fuel. (2) No person shall possess or store any fuel except under authority of a license or a certificate approved by the Minister of MIME. (3) The Minister of Mines and Energy has under regulation 44 of the Petroleum Products Regulations approved the use in	The core products traded by the applicant is fuel – ULP and ADO.

	Namibia of these specifications, standards and code of practice: • the American Standards Institute (ASI); • the British Standards Institute (BSI); • the South African Bureau of Standards (SABS, and • the South African National Standards (SANS) and • *SABS 0131-1: 1977* – The storage and handling of liquid fuel Part 1 – Small consumer installations. *SABS 0131-2 : 1979* – Storage and handling of liquid fuel Part 2 – Large consumer installations; *SABS 0131-3 : 1982* – The storage and handling of liquid fuel Part 3 – Bulk low-flash point fuel storage and allied facilities at large consumer installations, and *SABS 0108* – Classification of hazardous locations and selection of apparatus for use in such locations.	
The Local Authority Act **(No. 23 of 1992)**	• Provides for the establishment of local authority councils to manage and handle the affairs of local government and defines the powers of the local councilors, duties and functions; • Outlines the structure of local authority councils, including membership, elections, and management, and • Addresses issues such as infrastructure, service provision, taxation, and financial management of local authorities.	The site is situated within a local authority
Labour Act (Act 11 of 2007 as amended)	• The Act contains extensive and detailed provisions relating to the basic employment conditions, rules regarding termination of employment, dismissals and disciplinary action; • It also provides for the prevention of trade disputes, unfair labour practices, regulates and controls collective job action, employment agencies and all matters incidental thereto, and • The Act also provides the right to the employees to speak about work conditions, the right to say no to unsafe work, the right to be consulted about safety in the workplace and the right to workers compensation.	About 28 persons are in fulltime employment at the FRO.
Occupational Safety and Health Act No. 11 of 2007;	"Safety: the condition of being safe; freedom from danger, risk or injury." Occupational safety and health is a cross-disciplinary area concerned with protecting the safety, health and welfare of people engaged in work or employment. The goal of all occupational safety and health programs is to foster a safe working environment. As a secondary effect, it may also protect co-workers, family members, employers, customers, suppliers, nearby communities, and other members of the public who are impacted by the workplace environment. By law, employers must provide their employees with a safe and healthy working environment.	Fuel is highly flammable and releases VOC into the atmosphere when handled it is therefore a hazardous product.

Public and Environmental Health Act (Act No. 1 of 2015)	• The Act provides for a legal framework for a structured more uniform public and environmental health system and for matters incidental thereto; • It deals and provides guidelines on noise generation and control thereof within an urban environment; • Also deals with waste management, handling or collection, waste disposal, waste recycling, sanitation, etc.;	The site is used by members of the public whose health and wellbeing has to be protected.
Social Security Act Act 34 of 1994 **Employees' Compensation Act** (as amended)	• Compels employers and employees to make equal contributions to the Social Security Fund. Contribution is based on 0.9% of an employee's basic earnings with a minimum of N$2.70 and a maximum of N$81.00 • Requires employers to contribute to an insurance fund which covers injuries and accidents on duties.	Employees must be registered with the social security Commissioner and for the Workmen's Compensation
Hazardous Substances Ordinance (No. 14 of 1974)	• Provides for the control of hazardous substances with potential to cause harm, injuries and even death. • Also provides for the manufacture, handling, storage, sale, use, disposal, etc. of hazardous substances.	Fuel is hazardous product
Atmospheric Pollution Prevention Ordinance (No. 11 of 1976)	• Provides control of noxious or offensive gases and matters incidental thereto. • Requires best practical means for preventing or reducing the escape into the atmosphere of noxious or offensive gases produced by the scheduled process.	•
Water Resource Management Act (2004)	The following permits are required in terms of the Water Act: • Water abstraction permits; • Domestic effluent discharge permits (site offices, construction camp); industrial effluent discharge permits; • Water use for dust suppression; and water reticulation permits (pipelines), and • Will be superseded by Water Resources Management Act 2013 once the regulations are implemented in the future.	The tanks at FRO are buried underground with the potential to leak and contaminate water resources and the soil.
National Heritage Act No. 27 of 2004	No archaeological/heritage site or cultural remains may be removed, damaged, altered or excavated. • Section 48 sets out the procedure for application and granting of permits, such as the permit required in the event of damage to a protected site occurring as an inevitable result of development. Section 51 (3) sets out the requirements for impact assessment. • Part VI Section 55 Paragraphs 3 and 4 require that any person who discovers an archaeological site should notify the National Heritage Council	This Act is mostly applicable with new sites that are being constructed.
Namibia Standard Act (Act No. 18 of 2005)	Responsible for the promotion of standardization and quality assurance in the industry, commerce and the public sector in Namibia, with the aim of improving product quality, industrial efficiency and productivity and promoting trade so as to achieve optimum benefit for the people of Namibia.	Fuel is sold in units of liters and pumps have therefore to be correctly calibrated using recognized standards.

Table 5: Standards and Relevant Multilateral Agreements

Standard and or Agreements	Expansion of Key Aspects
SANS	The Petroleum Products and Energy Act prescribes SANS standards for construction, operations and demolition for petroleum facilities. SANS 10400 – regulates all buildings including fuel service stations SANS 10089-3: The installation, modification, and decommissioning of underground storage tanks, pumps/dispensers and pipework at service stations and consumer installations.
Namibia Standards Institution	The Namibian Standards Institution (NSI) is Namibia's national standards body, established by the Standards Act of 2005 to promote standardization, quality assurance, and conformity assessment. It is a regulatory agency focused on industrial efficiency, consumer safety, and protecting the environment to facilitate trade. NSI is developing Namibian Standards (NAMS), certification of products and management systems (ISO 9001, etc.), and conducting testing and inspection services, particularly for the fishing and manufacturing sectors.
National Development Plans	The 6th NDP is government's development footprint focusing on economic growth, inclusivity, and resilience targeted at tackling poverty, unemployment, and inequality. Economic Growth, Human Development, Environmental Sustainability, Good Governance are the four pillars of NDP 6.

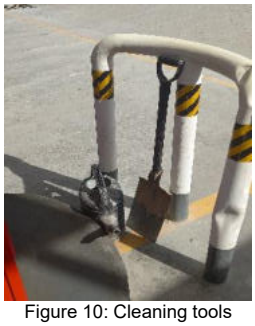
Figure 10: Cleaning tools


Figure 11: Fire extinguisher


Figure 12: Runoff water drainage leading to an oil-water separator


Figure 13: Safety Signage


Figure 14: Fire hosepipe


Figure 15: Cement used for minor spill cleaning up


Figure 16: A channel collecting runoff from the pump island

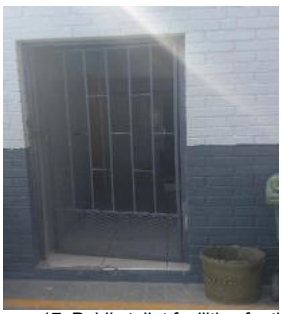
Figure 17: Public toilet facilities for the patrons

Figure 18: Waste storage bins for recyclable and non-recyclable waste

4 THE RECEIVING ENVIRONMENT

This section lists the pertinent baseline environmental characteristics of the study area within which the FRO exists and provides a statement on the potential environmental impacts on each.

4.1 Geology – Regional and Local

The Kunene region has an interesting geology dominated by the Mesoproterozoic Kunene Complex. This is a large igneous body composed mainly of anorthosites and gabbroic rocks, extending into Namibia and neighbouring Angola. In some areas of the region, the complex is found buried beneath the younger Kalahari sediments while in other areas it is found intruded by mafic and A-type granitic bodies. There is a surge for exploration activities in the region driven by strong demand for critical minerals required to power gadgets such as mobile cellphones and related devices.

The local geology is predominantly characterized by ancient rocks of the Damara and Namaqua Belt, a complex geological region in NW Namibia. The Namaqua Belt consists of a series of metamorphic and igneous rocks that were formed during the Proterozoic Eon, between 2.5 billion and 1 billion years ago (Goscombe et al., 2012).

Potential Environmental Risks/Impacts:

Geological formations have the potential to pose risks to FROs affecting the integrity of USTs and environmental contamination. High groundwater tables, corrosive soil types, and seismic instability can also lead to tank corrosion, structural failures, product leakage, and the widespread transport of contaminants, resulting in costly remediation and environmental hazards.

4.2 Seismic Activities

On 14 March 2018, at about 10h38 local time, an earthquake which recorded a magnitude of 4.8 occurred approximately 68 northwest of Khorixas. The epicenter was ±11 km deep. The event prompted the Geological Survey of Namibia in collaboration with the Council for Geoscience of South Africa to deploy a temporary seismic network between June and September 2018 to monitor the unusual swarm of activities. Over 1600 micro seismic events were recorded around the Anker area (±50 km west of Kamanjab) during that period.

Since 2012, a total of 49 earthquakes with a magnitude of up to 5.0 have been recorded within a 100 km radius of Khorixas. The recent earthquake was recorded on 22 April 2022 at about 22h36 local time which registered 5.0 and occurred approximately 33 km north of Kamanjab. The epicenter has not been established but it was predicted to be at shallow depth.

The swarm of seismic events that took place around the Anker area are attributed to the release of energy built up in the rock mass as a result of tectonic plate movements with the Damara belt in the south trending NE-SW and the Karoo belt in the east trending in the NW-SE.

Potential Environmental Risks/Impacts:

Seismic activity poses significant risks to FROs through structural damage to USTs) and piping, causing leaks and fuel spills. Such leaks can result in explosions, fires, and contamination of soil and groundwater resources, while also disrupting critical infrastructure. Key hazards include ground shaking leading to pipe failure, liquefaction causing tanks to rise, and structural collapse of canopies.

4.3 Landscape and Surrounding Land Use

The site is located within the formal urban area of Khorixas, a small but growing semi-arid town. The general gradient of the site is relatively flat with a natural drainage from the north to the south. The FRO is in a built-up area of the town. The following land uses occur within a 300 m radius from the boundary of the FRO:

- Government offices and public facilities are located in the surrounding area.
- Residential areas are in the vicinity of the town centre.
- Commercial and retail activities are present in the town centre.
- The main road through Khorixas passes along the site, carrying both local residents and guests visiting the region.

Potential Environmental Impacts

The site has been fully developed and the landscape completely transformed with the operational activities at the facility tying in with the surrounding land uses. There were no institutional or public buildings (schools, clinic, hospitals, etc.) in close proximity to the site.

4.4 Climatic Conditions

Khorixas is located in a semi-arid to arid climatic zone. The town experiences hot, dry summers and mild winters, with rainfall that is variable and generally low, occurring primarily in the summer months (November to April). The area is characterised by:

4.4.1 Temperature

Temperatures in Khorixas are warm to hot throughout the year. Summer (October–March) temperatures regularly exceed 35°C. Winters are mild during the day but can be cold at night, with temperatures dropping below 10°C.

Potential Environmental Impacts

High ambient temperatures combined with hot surfaces from vehicles can pose significant dangers such as catalytic converters, creating the constant ignition risks. Extreme heat can lead to higher volatility of petroleum products, which increases the risk of fire, and even explosions. High temperature has also the potential to accelerate VOC (volatile organize compound) emissions creating a health risk for the personnel and residents living near the FRO.

4.4.2 Rainfall

Mean annual rainfall is approximately 150–250 mm, distributed primarily in the summer months. The variability of rainfall is high, with some years receiving significantly below average rainfall. The area is therefore prone to drought conditions.

Potential Environmental Impacts:

An FRO in a low-rainfall area does not face significant dangers related to the contamination of soil and water from fuel spills. Additionally, low rainfall cannot overwhelm drainage systems, and incidents of flooding, which can cause underground tanks to leak or fail altogether, are therefore non-existent.

4.4.3 Groundwater

Groundwater in the Khorixas area is present at variable depths. The risk of groundwater contamination from UST leaks is a key environmental concern, particularly given that groundwater is used for domestic and agricultural purposes in the broader Kunene Region. The USTs at the station are installed with appropriate leak detection and containment infrastructure to minimise this risk.

4.4.4 Population

The town's population has grown steadily and it serves as a service centre for the surrounding communal areas and as a gateway for tourism to the Kunene Region, including Etosha National Park's northern gate and Damaraland. This gives the FRO a stable and growing customer base.

4.4.5 Socio-economic Activities

The economy of Khorixas and the Kunene Region is based primarily on subsistence and commercial farming, tourism, government services, and small-scale business. Khorixas serves as a key fuel stop for road transport between Windhoek and the far north-west. The FRO therefore plays an important role in supporting the socio-economic functioning of the town and the region.

5 ENVIRONMENTAL MANAGEMENT PLAN

Presented in this section are aspects related to:

- Raising of environmental awareness
- An emergency preparedness plan
- Potential environmental emergencies
- Role players and their respective functions with respect to the EMP
- Presentation of the EMP

5.1 Environmental Awareness

The aspects presented in this section are:

- An Environmental Awareness Plan.
- An Emergency Preparedness Plan.
- Breaches of the EMP.
- EMP review and amendments/updates.

5.1.1 An Environmental Awareness Plan

An Environmental Awareness Plan (EAP) is a strategy aimed at educating and raising awareness about environmental issues and encouraging personnel and the general public, including company employees, to adopt sustainable practices and to protect the natural world.

Training on environmental awareness should be provided to all FRO personnel from time to time. Potential incidents to the environment can be effectively minimised through effective training and raising of environmental awareness of the workforce through these methods:

- Toolbox talks (daily).
- Supervisory meetings (weekly).
- Induction training (at inception and thereafter bi-annually).
- External environmental and/or health and safety courses (when applicable).

5.1.1.1 Toolbox Talk

Toolbox talks are important actions aimed at cultivating a culture of safety amongst employees, especially those involved in hazardous workplaces such as fuel service stations. In the context of this project, these topics can be discussed during toolbox talks:

- Hygiene: How ablution facilities are to be kept neat and tidy.
- Protective Equipment: The importance of using safety shoes, gloves, and safety glasses.
- Electrical Safety: Electrical hazards and how to properly use and maintain electrical equipment.
- Workplace Hazards: Identification of commonly encountered hazards such as slippery floors and fuel vapours.
- Emergency Preparedness: The importance of knowing emergency procedures and the location of firefighting equipment.
- CO2 emissions and Namibia's environmental responsibilities.

5.1.1.2 Supervisory Meetings

Weekly supervisory meetings are ideal to facilitate awareness of specific environmental dangers pertaining to the day-to-day operation of the FRO. All attendees at each meeting must sign an attendance register and records must be kept on file. These topics can be included for discussion:

- General environmental awareness.
- Waste handling.
- Spillages and/or leaks.
- Water saving measures.
- Greenhouse gas (GHG) emissions and global warming.
- Impacts of climate change.
- Good housekeeping practices.
- Complaints received.

5.1.1.3 Training of Employees

Induction training must be provided to all new employees prior to commencing work at the facility. Topics to be covered include:

- Overview of the EMP and its requirements.
- Site-specific emergency procedures and evacuation routes.
- Safe handling and dispensing of petroleum products.
- Correct use and care of PPE.
- Waste segregation and disposal procedures.
- Spill prevention and response.
- Reporting of incidents and near-misses.

5.2 Emergency Response Plan

5.2.1 Site-Specific Emergency Plan

A site-specific Emergency Response Plan (ERP) must be developed, maintained and displayed prominently at the FRO. The ERP must describe the procedures to be followed in the event of each identified potential emergency. The plan must be reviewed at least annually and updated where necessary. All staff must be trained on the ERP at induction and thereafter at least annually.

5.2.2 Potential Emergencies

The following potential emergency scenarios have been identified for Mirabilis Service Station CC:

- Fire at the forecourt or in the convenience shop.
- Fuel spillage during offloading from a road tanker into USTs.
- Fuel spillage during dispensing into a customer vehicle.
- UST leak or rupture.
- Vehicle collision on the forecourt.
- Personal injury or medical emergency.
- Theft or armed robbery.
- Electrical fault or power outage.

5.2.3 Emergency Procedure

In the event of any emergency, the following general procedure must be followed:

- Raise the alarm and alert the Service Manager immediately.
- Evacuate all personnel and customers to the designated assembly point.
- Call the relevant emergency services (Fire, Police, Ambulance) as appropriate.
- Contain the emergency (e.g. isolate the fuel supply, use firefighting equipment for small fires).
- Do not re-enter the affected area until declared safe by the relevant authority.

- Record the incident in the site incident register and report to the relevant authorities as required.

5.2.4 Emergency Contact Information

A physical emergency contact notice board must be prominently displayed at the station at all times and must include the following contacts:

- Khorixas Police Station
- Khorixas Town Council / Fire Services
- Nearest Health Clinic or Hospital
- Caltex Namibia Emergency Line
- Ministry of Environment, Forestry and Tourism (MEFT) — Kunene Region
- Service Station Manager (Panduleni Nangolo): +264 81 288 5933

5.3 Potential Environmental Emergencies

5.3.1 Water Leaks or Burst Pipes

In the event of a water leak or burst pipe on site:

- The water supply to the affected section should be isolated immediately using the nearest shut-off valve.
- The Service Manager must be notified immediately.
- The Khorixas Town Council must be notified if the leak involves the municipal supply infrastructure.
- The leak must be repaired by a qualified plumber as soon as possible.
- The incident must be recorded in the site incident register.

5.3.2 Oil, Diesel or Fuel Spills from Vehicles

In the event of an oil, diesel or fuel spill from a customer vehicle:

- Deploy the spill kit immediately to contain and absorb the spill.
- Prevent the spill from entering drains, stormwater systems or oil/water separator by using bunding materials.
- Collect all contaminated material (absorbents, soil) and dispose of as hazardous waste.
- Record the incident in the site incident register.

5.3.3 Fuel Spillage (Diesel, Petrol and Oil)

In the event of a fuel spillage during offloading or dispensing operations:

- Minor spills (< 200 litres): Cease dispensing operations in the affected area. Deploy the spill kit. Contain, absorb, and recover the spilled fuel. Dispose of all contaminated material as hazardous waste. Record the incident.
- Major spills (> 200 litres): Immediately cease all fuel dispensing and offloading operations. Activate the emergency shut-off system. Evacuate the immediate area. Call the fire services and MEFT. Contain the spill using available bunding. Do not allow the spill to enter drains, stormwater systems, or the natural environment. Report the incident to the MEFT, Khorixas Town Council, and Bachmus Oil & Fuel Supplies within 24 hours. Record the incident and conduct a root-cause investigation.

5.4 EMP Review and Amendment

This EMP is a living document and must be reviewed and updated in the following circumstances:

- At least every three (3) years, consistent with the validity period of an ECC.
- Following any significant change in operations, site layout, ownership, or applicable legislation.
- Following any significant environmental incident or non-compliance finding identified during an audit.
- Where required by the OEC or any other relevant regulatory authority.

All amendments to the EMP must be approved by the promotor and submitted to the OEC as required. A version control record must be maintained.

5.5 Record Keeping

The following records must be maintained on site at all times and made available for inspection by the OEC, MIME, KTC, and any other relevant authority:

- Copies of all valid licences, certificates, and authorisations (ECC, Retail Licence, Fitness Certificate, Social Security Registration, Business Registration).
- This EMP report and all subsequent amendments.
- Daily UST dip register.
- Forecourt and infrastructure inspection register (monthly).
- Incident and spill register.
- Training records and attendance registers.
- Waste disposal manifests and records of hazardous waste removal.
- ECO audit reports (annual).
- Health, Safety and Security Audit reports (annual).

5.6 Non-compliance and Penalties

Any failure to comply with the requirements of this EMP constitutes non-compliance. Instances of non-compliance must be:

- Recorded in the site incident register by the Service Manager.
- Investigated to determine the root cause.
- Remedied within an agreed timeframe.
- Reported to the ECO, who must in turn report to the OEC where required by the ECC conditions.

The promoter acknowledges that non-compliance with the ECC conditions or the provisions of EMA may result in the suspension or withdrawal of the ECC, and/or prosecution in terms of applicable legislation.

5.7 Role Players

5.7.1 Roles of Statutory Stakeholders

The roles and responsibilities of key statutory stakeholders are presented in **Table 6** below.

Table 6: Roles and Functions of Statutory Stakeholders

Stakeholder	Role
The Environmental Commissioner (EC)	• Ensure overall compliance with the provisions of the EMP. • Review this document and any revisions thereof. • Undertake site audits at their discretion. • Review any environmental audit reports submitted to MEFT. • Review any major environmental related incidents/accidents. • Enforce the legal mechanisms for contraventions to the EMP.
The Petroleum Commissioner (PC)	• Ensure adequate supply of petroleum products to the nation. • Minimise negative impact of petroleum resources exploitation on the environment. • Grant licences to role-players in the petroleum subsector. • Undertake inspections/visits to fuel service stations at discretion.

	• Ensure that high standards of safety and health are upheld throughout the petroleum subsector. • Enforce the legal mechanisms for contraventions of the Petroleum Products Act.
Local Authority - Khorixas Town Council	• Ensures that the FRO adheres to the EMP to prevent soil, water and air pollution, including monitoring the effectiveness of pollution control measures such as oil/water separator. • Issues Fitness Certificates to businesses in terms of the Local Authorities Act. • Enforces the overall compliance of EMA and ensures that the FRO operates in compliance with its ECC conditions. • Reviews and approves site layouts and building plans for renovations and upgrades. • Reviews biannual reports on environmental performance for renewal of ECCs. • Ensures that streets are well lit, waste is removed from business premises, and roads are safe and clean.

5.7.2 Roles and Functions of the Promoter

The roles and responsibilities of the promoter and other stakeholders are presented in **Table 7**. It should be noted that the overall responsibility for the execution of the project, in terms of the Environmental Management Act, lies with the promoter and its technical partners.

Table 7: Roles and Functions of the Applicant and Key Personnel

Person Responsible	Functions and Responsibilities
The Promoter *(Mirabilis Service Station CC)*	• Ensure that the necessary environmental authorisations and permits are obtained and copies kept on file. • Compliance is maintained with all applicable legislations, regulations, and policies pertaining to its sphere of operation. • Quarterly internal EMP compliance inspections are undertaken and annual audit reports submitted to the OEC. • A competent individual is appointed to handle the operational aspects of the FRO in the designation of a Fuel Service Manager (FSM). • An Emergency Response Plan for the facility is developed, implemented, and reviewed annually. • All staff are adequately trained on the EMP requirements.
Fuel Service Manager (FSM) *(Panduleni Nangolo)*	• Responsible for the day-to-day management of the FRO including the EMP, human resources and physical assets of the business. • Responsible for the overall activities at the fuel facility, including planning, developing, and implementing strategy for facility operations. • Establish and maintain appropriate systems for measuring operational efficiency and compliance with the EMP. • Direct and monitor health and safety aspects in the business and conduct identification of hazards and review of risks. • Resolve customer issues related to fuel operations. • Maintain all records required by this EMP. • Record environmental incidents (spills, impacts, legal transgressions, etc.) and take corrective and preventive actions. • Attend to any complaints from stakeholders or IAPs by recording the complaint and taking corrective action. • Prepare environmental compliance reports (audit/monitoring/compliance) for submission to the OEC.

6 PRESENTATION OF THE EMP

Since the project site is a brownfield one (an existing operational facility), mitigation measures for predicted environmental impacts have been presented in a table format covering two phases namely: operation (including routine maintenance and renovations) and decommissioning (should it become necessary), each of which is briefly described as follows.

6.1 EMP for the Operational Phase

The management measures recommended to deal with the environmental impacts associated with this phase of the facility are presented in **Table 8** below. The table comprises of four columns with these headings:

- Potential Impacts/Aspects;
- Environmental Objective(s);
- Management Measures; and
- Responsible Party.

6.2 The EMP for Decommissioning

Decommissioning is an important phase in the project cycle, coming last to wind up the operational activities of the project. It refers to the final disposal and associated materials at the end of the FRO lifespan. If such a stage is reached, the proponent needs to remove all materials resulting from the demolition/decommissioning activities. .

Given that the facility is an existing operational FRO, decommissioning is not projected to occur within the three-year validity period of an ECC. However, the following measures are provided in the event of decommissioning having to occur prematurely, for instance due to factors beyond the control of the promoter, i.e. economic recession, sabotage, etc. The EMP for decommissioning is presented in **Table 9**. Decommissioning will cover these aspects:

- Removal of USTs from the site.
- Rehabilitation of the site to a safe and stable condition.
- Landscaping by flattening mounds of soil and, where appropriate, planting indigenous vegetation.
- Dismantling of all equipment (pipes, pumps, electrical cables, etc.).
- Removal of all dismantled equipment and disposal in a responsible manner.
- Fencing and signposting unsafe areas until natural stabilisation occurs.
- Retrenchment of employees in accordance with the Labour Act.

7 CONCLUSIONS AND RECOMMENDATION

The FRO run by MSS in the town of Khorixas has been in existence for several years and is operated in compliance with the fuel retail industry guidelines, standards and specifications. The primary objective of the EMP is to serve as a legally binding management tool that ensures that the operational activities for the FRO comply with the Environmental Management Act (No. 7 of 2007). The EMP functions by identifying potential environmental and social risks and prescribing specific mitigation measures to eliminate and or to minimise such adverse impacts.

It is recommended that an ECC be granted to Mirabilis Service Station CC subject to the applicant adhering to implement the mitigation measures outlined in the EMP.

Table 8: EMP for the Operations

Potential Impacts/Aspects	Environmental Objective(s)	Management Measures	Responsible Party
Compliance Requirements and Documentation	Comply with applicable statutory requirements.	**Licences/Permits** • Environmental Clearance Certificate (ECC) • Fitness Certificate (Khorixas Town Council) • Fuel Retail Licence (No. R/5/2022, MIME) • Social Security Registration (No. 30169817) • Business Registration (No. CC/2022/03107) **Documents** • This EMP Report • A Waste Management Plan • An Emergency Response Plan • A Spill Procedure Plan • A Fire Procedure Plan • An Environmental Awareness Training Manual	Promotor & FSM
Communication with Statutory Stakeholders and IAPs	Provide regular communication to stakeholders and IAPs.	• Devise and implement an open and transparent communication strategy with stakeholders — statutory and IAPs. • Record and report all incidents and accidents occurring at the facility. • Record complaints received from IAPs, investigate and take corrective actions.	Promotor & FSM
Underground Fuel Storage and Handling *(Spills, leaks, contamination of surface and groundwater sources)*	Prevent potential contamination of soil and water sources.	• Monitor fuel volumes in the USTs on a daily basis to detect unexplained losses due to leakages. • Inspect the condition of the tanks, piping and pumping systems on a regular basis. • Test tank integrity at least five (5) years after installation, with repetition on a 5-year cycle thereafter. • The forecourt area and the filling points must be concreted and graded so that any effluent run-off does not enter the natural environment, but passes through an oil/water separator sump before discharging into a collection ditch. • The oil/water separator sump must be checked regularly and kept clean to prevent blockage and overflow. • Ensure no spill or leaks occur during fuel offloading into USTs and during dispensing. • Waste from the separator must be disposed of in a responsible manner at an approved, offsite licensed hazardous waste facility.	FSM
Fire Risk and Preparedness *(Asset destruction, personal injuries, loss of income)*	Prevent property damage, injury to persons and financial losses caused by uncontrolled fires.	• Develop a firefighting emergency response plan and train all employees accordingly. • Carry out firefighting drills on a regular basis. • Ensure adequate firefighting equipment is provided, regularly maintained, serviced and inspected.	FSM

		• Ensure that all hazardous substances are stored and handled in accordance with MSDS and SANS specifications. • Display fire hazard signs, emergency exit directions, route to follow, and assembly point. • All electrical appliances at the facility must be regularly inspected and repaired by a qualified electrician. • Any spills or leaks that occur must be cleaned up with suitable spill kit equipment.	
Waste Management (Solid and Hazardous) *(Littering, pollution, contamination, health issues, nuisance, odour)*	Ensure waste (solid and hazardous) is managed properly.	• Develop a Waste Management Plan for the facility and enforce its compliance. • Promote good waste management practices of prevention, re-use, recycling, recovery and disposal. • Store domestic waste in labelled, properly secured and covered containers. • Store solid waste in a designated, enclosed and impermeable general waste storage area. • Ensure adequate refuse collection to avoid build-up of refuse at the facility. • Sludge from the oil separator must be disposed of at an offsite licensed hazardous landfill. • All product spills within the bunded area must be effectively cleaned up. • No waste shall be buried or burned anywhere on the fuel premises.	FSM
Stormwater, Sewage and Wastewater	Ensure that no impacts emanate from stormwater, sewage and wastewater.	• Develop and implement a plan to deal with any stormwater and sewage at the facility. • Stormwater runoff from paved areas should be diverted into a treatment device capable of removing litter, sediments and oil products. • At first sign of erosion, undertake corrective measures to resolve and prevent recurrence. • Conduct inspections on ablution facilities and associated piping for leakages, blockages or damage and have them fixed promptly. • All wastewater generated from the site should be discharged into the onsite sewage system.	FSM
Air Pollution *(Prolonged exposure to VOCs can cause cancer and other health effects)*	Promote amenity values and minimise gaseous emissions.	• Fuel vapours are released into the atmosphere during dispensing and during offloading from road tankers into USTs — prolonged exposure can have detrimental health effects. • Vent pipes should be properly placed as per SANS specifications and regularly inspected. • Install Volatile Organic Compound (VOC) vapour recovery systems onto fuel dispensing nozzles. • Provide suitable PPEs to personnel handling refuelling at the facility. • All equipment used must be manufactured to limit VOC vapour emissions. • Operational refuelling procedures must be implemented to limit vapour emissions.	FSM

		• Monitor gaseous emissions (PM10, SO2, NO2, CO) on a yearly basis. • Any complaint received about air pollution must be recorded and investigated.	
Noise Pollution	Ensure that noise generated at the facility is kept below industry threshold.	• Establish noise level thresholds consistent with WHO guidelines. • Equipment (pumps, etc.) used at the facility must comply with the manufacturer's specifications on acceptable noise levels. • Air conditioners should be well maintained and regularly serviced to ensure minimal noise generation. • Workers must not produce any unnecessary noise. • Display signs such as 'No Hooting' and 'No Idling' to inform patrons to comply.	FSM
Visual Intrusion	Protect amenity values by minimising aesthetic impacts associated with the facility.	• Cleaning, waste disposal, maintenance of the plants and landscaped surrounds will give the facility a good visual appeal. • Good housekeeping which includes routine maintenance of infrastructure will improve the aesthetic appeal. • Lights at the facility must be used for security purposes only and must be directed inwards, not outwards. • Lights may not offend the public or disorientate birds flying at night.	FSM
Health, Safety and Security Risks	Maintain a high standard of housekeeping so as to prevent injuries to personnel and theft.	• Develop a health and safety management plan for the facility in compliance with industry specifications and standards. • Train employees on personal safety and disaster preparedness. • Provide sufficient and suitable sanitary conveniences which should be kept clean. • Maintain a well-stocked First Aid kit on the premises and have a qualified First Aider on each shift. • Ensure that adequate lighting and an alarm system are installed at strategic points. • Smoking should be prohibited in the vicinity of all flammable substances and adequate signage displayed. • Records of all environmental and/or health and safety related incidents must be maintained and reported. • Conduct an annual Health, Safety and Security Audit.	FSM
Management of Resources	Manage resources wisely and sparingly.	**Electricity:** • Use electricity sparingly. Use natural ventilation from windows and doors where possible. • Measure electricity consumption monthly. **Water:** • Use water sparingly and wisely.	FSM

		• Detect leaking pipes and taps and get them fixed promptly. • Enforce water saving strategies including recycling and reuse. • Measure water consumption on a monthly basis. **Sanitation:** • Monitor sanitation consumption. Guard against misuse. • Maintain a high standard of housekeeping.	
Socio-economic Environments	Ensure that local communities benefit from the facility.	• Recruitment should be done in line with the labour laws of Namibia. • Offer employment opportunities without prejudice, giving preference to women, people with disabilities and those from marginalised communities. • Where possible, preference should be given to jobseekers from within Khorixas and the Kunene Region. • Develop a policy on employees' well-being, educating them on the dangers of social ills such as alcohol abuse, drugs and HIV. • Hiring of non-Namibians for low-skilled jobs is forbidden and acceptable justification must be provided to the authorities. • Empower employees through on-the-job training and skills transfer. • Procure goods and services required for operations from local businesses where possible.	Promotor & FSM

Table 9: EMP for Decommissioning

Potential Impacts/Aspects	Environmental Objective(s)	Management Measures	Responsible Party
Communication	Provide information on decommissioning to relevant statutory stakeholders.	• Inform the relevant government ministries and agencies (MIME, MEFT, Labour, NamRA, SSC, etc.) of the planned decommissioning. • Inform third-party creditors including the bulk fuel supplier (Bachmus T/A Caltex Namibia). • Inform affected employees and their trade union representatives, giving notices as provided for in the Labour Act. • Hire a reputable company to carry out the decommissioning.	FSM
Disturbed Physical Environment	Protect amenity and limit disturbance to the physical environment.	• Develop a Decommissioning Plan. • Assign the work to a reputable company with a track record of dismantling hazardous plants. • Undertake a complete environmental restoration programme.	FSM
Fuel Tanks	Protect amenity values by ensuring no harm results from the retrieval of USTs.	• Ensure there is no spillage of any residual fuel during the emptying and removal of USTs. • Pumps and associated equipment to be removed by qualified personnel. • Any fuel removed from the tanks and any surrounding soil that may be contaminated must be removed and disposed of at a licensed landfill site.	Contractor & FSM
Noise and Air Pollution	Keep noise levels within allowed standards.	• Maintain plant and equipment well during the decommissioning phase. • Demolition works to be carried out during daytime only. • Provide demolition personnel working in noisy areas with suitable PPEs. • Spray dusty areas to suppress dust. • Install dust trappers around the site where warranted.	Contractor & FSM
Solid Waste	Strive to minimise waste generation.	• Demolished debris should be stored in a secure place and disposed of in a responsible manner. • Demolished waste should be re-used or backfilled where possible. • All waste generated should be collected by a registered waste collection company.	Contractor
Occupational Health and Safety	Maintain a high standard of housekeeping so as to prevent injuries to personnel.	• Provide suitable PPEs to employees. • Train the workers on personal safety and on how to handle equipment and machines. • Provide suitable sanitary conveniences which should be kept tidy and clean.	FSM & Contractor

Loss of Employment	Strive to limit social impacts by helping employees get rehired.	• The safety of personnel should surpass all other objectives during the decommissioning process. • Adopt a project completion policy identifying key issues to be considered. • Compensate the retrenched workers in accordance with the Labour Act and assist them in seeking employment opportunities elsewhere.	FSM

— END OF DOCUMENT —

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Appendix A

BUSINESS REGISLATION WITH THE LOCAL AUTHORITY

REPUBLIC OF NAMIBIA

KHORIXAS

OUR TOWN OUR PRIDE

KHORIXAS TOWN COUNCIL

BUSINESS REGISTRATION CERTIFICATE

Number: M-2/2022/22 – 07 - 15

Receipt Number: 55694

REGISTRATION OF BUSINESS

a) *Trade name, designation or title of business:* **Mirabilis Service Station CC**

b) *Class of business:* **High Risk (Service Station)**

c) *Full name of owner(s):* **Cornelius Jacobus Labuschagne**

d) *In case of partnership or company, name of each partner or director:* N/A

e) *Full name of Manager:* **Hannerie**

f) *Postal address:* **P. O. Box 7415, Otjiwarongo**

g) *Physical Address of business:* **Erf: 2279 Khorixas Proper, Khorixas**

h) *Physical address at which goods traded in are stored:* **Erf: 2279 Khorixas Proper, Khorixas**

i) *Business Registration No:* **CC/2022/03107**

j) *The conditions, if any, subject to which this certificate of registration was granted:* **None.**

k) *Date when certificate will Lapse:* **30 June 2023.**

.....

Chief Executive Officer

KHORIXAS TOWN COUNCIL
CHIEF EXECUTIVE OFFICER

2022 -07- 15
Date Stamp
PRIVATE BAG 2005
KHORIXAS
NAMIBIA

REPUBLIC OF NAMIBIA

KHORIXAS

OUR TOWN OUR PRIDE

KHORIXAS TOWN COUNCIL

BUSINESS REGISTRATION CERTIFICATE

Number: M-2/2022/22 – 07 - 15

Receipt Number: 73928

REGISTRATION OF BUSINESS

a) *Trade name, designation or title of business:* **Mirabilis Service Station CC**

b) *Class of business:* **High Risk (Service Station)**

c) *Full name of owner(s):* **Cornelius Jacobus Labuschagne**

d) *In case of partnership or company, name of each partner or director:* **N/A**

e) *Full name of Manager:* **Panduleni Nangolo**

f) *Postal address:* **P. O. Box 7415, Otjiwarongo**

g) *Physical Address of business:* **Erf: 2279 Khorixas Proper, Khorixas**

h) *Physical address at which goods traded in are stored:* **Erf: 2279 Khorixas Proper, Khorixas**

i) *Business Registration No:* **CC/2022/03107**

j) *The conditions, if any, subject to which this certificate of registration was granted:* **None.**

k) *Date when certificate will Lapse:* **30 June 2025.**

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Chief Executive Officer

KHORIXAS TOWN COUNCIL
CHIEF EXECUTIVE OFFICER
2024 -09- 19
Date Stamp
PRIVATE BAG 2005
KHORIXAS
NAMIBIA

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Appendix B

Fitness Certificate

KHORIXAS TOWN COUNCIL

REPUBLIC OF NAMIBIA

KHORIXAS

Tel: 067 – 331119
Fax: 067-331001
Email: pa2ktc@gmail.com

Private Bag 2005
Khorixas
Namibia

KHORIXAS TOWN COUNCIL

CERTIFICATE OF FITNESS

Receipt **Number:** *73928*

This is to certify that the premises described beneath is suitable in terms of the provisions of the General Regulations (G.W. 121 dated 14 October 1969) as amended, to carry the following business or trade:

a) Name of Owner: ***Cornelius Jacobus Labuschagne***

b) Address where business is carried on: ***Erf 2279 Khorixas Proper, Khorixas***

C) Trade name, designation or the title of the business: ***Mirabilis Service Station CC***

d) Class of business: ***High Risk (Service Station)***

e) Conditions, if any, subject to which the certificate was granted: ***None***

f) Date when certificate lapse: ***30 June 2025.***

2024 - 09 - 19

KHORIXAS TOWN COUNCIL
CHIEF EXECUTIVE OFFICER
2024 -09- 19
PRIVATE BAG 2005
KHORIXAS
NAMIBIA

.....

Health Department
(Represented)

APP007412

Appendix C

FUEL RETAIL LICENCE

MINISTRY OF MINES AND ENERGY

PETROLEUM PRODUCTS AND ENERGY ACT, 1990
PETROLEUM PRODUCTS REGULATIONS (2000)

RETAIL LICENCE

[Regulation 5(4)]

RETAIL LICENCE		**Licence No. R/5/2022**
Name of licence-holder	Mirabilis Service Station CC	
Address of licence-holder	**Physical Address**	**Postal Address**
	Farm Brunnenthal No. 8 Otjiwarongo Namibia	P.O Box 7145 Otjiwarongo Namibia
Name of Retail Outlet	Mirabilis Service Station CC	
Name of Supplying Wholesaler	Engen Namibia (Pty) Ltd	
Premises to which licence relates	Fuel Station, JXH8+39F Khorixas Namibia -20.4537856, 16.6625280	
Conditions applicable to licence *See overleaf of page for general and special conditions applicable to licence.*		
Date of issue of licence	06 December 2022	

Issued by the Minister of Mines and Energy in terms of regulations 5(4), on 06 December 2022 at Windhoek

MINISTRY OF MINES AND ENERGY
OFFICE OF THE MINISTER
OFFICIAL

.....
Minister: Mines and Energy

Ekwao Consulting

APP007412

Appendix D

Social Security Commission

YOUR FUTURE OUR MISSION

SOCIAL SECURITY COMMISSION

REPUBLIC OF NAMIBIA
SOCIAL SECURITY COMMISSION

SOCIAL SECURITY ACT, 1994

CERTIFICATE OF REGISTRATION AS AN EMPLOYER

(Section 20/Regulation 3)

This is to certify that - **MIRABILIS SERVICE STATION CC**

(Name of Employer)

Social Security Registration Number **30169817**

*Has been registered with the **SOCIAL SECURITY COMMISSION** as an Employer*

CHIEF EXECUTIVE OFFICER

Ekwao Consulting

APP007412

Appendix E

NOTIFICATIONS IN TERMS OF SECTION 21

Ekwao Consulting

95 Papageienweg
Hochland Park
WINDHOEK
Namibia

Box 25021
WINDHOEK
Namibia

Tel: 081 418 3125
Mobile:081 127 3027
Fax2Mail:088 645 026
Email: ekwao@iway.na

8 April 2026

The Chief Executive Officer
Khorixas Town Council
Private Bag 2005
KHORIXAS

Atten: Mr. Andreas /Howoseb!
Email: pa2ktc@gmail.com

NOTIFICATION IN TERMS OF SECTION 21 OF THE ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS

This letter serves to notify your good office as follows:

1. Ekwao Consulting CC ('**Ekwao'**) has been appointed by Mirabilis Service Station CC ('**MSS'**) to handle its application for an Environmental Clearance Certificate (ECC) with the Ministry of Environment, Forestry and Tourism (MEFT).
2. MSS is operating a Caltex branded fuel service station situated on Erf 2279 Khorixas Proper – the main street passing through Khorixas. In terms of the Environmental Management Act (**EMA**), (No. 7 of 2007), MSS is required to have a valid ECC, permitting its operational activities.
3. As directed by MEFT, Ekwao is hereby formally notifying the local authority in whose jurisdiction the fuel site is situated regarding MSS's ECC application.
4. Attached hereto is the Background Information Document (BID) submitted to MEFT, and the Screening Notice received from MEFT outlining the documents required to accompany the formal ECC application.

Yours Sincerely

Joel Shafashike
Member - Ekwao Consulting

Joel Shafashike

From: Joel Shafashike <ekwao@iway.na>
Sent: Wednesday, 8 April 2026 9:55 am
To: 'Executive Secretary'
Cc: 'Welwitchia@iway.na'
Subject: RE: FW: Notification of Local Authority

Thank you so much Ms Seibes

Regards

Joel Shafashike

EkwaoConsulting
EIA • Registration of Mineral Rights • Mining Technical Advice & Guidance

From: Executive Secretary <pa2ktc@gmail.com>
Sent: Wednesday, 8 April 2026 9:30 am
To: Joel Shafashike <ekwao@iway.na>
Cc: Welwitchia@iway.na
Subject: Re: FW: Notification of Local Authority

Good morning.

Your email is well noted.

Kind regards

Ms. Staysie J Seibes

Acting PA to CEO & Mayors' Office

Khorixas Town Council
067 331 119 (Tel)
067 331001 (Fax)

On Wed, Apr 8, 2026 at 9:23 AM Joel Shafashike <ekwao@iway.na> wrote:

> For the kind attention of Mr. Andreas /Howoseb!
>
> Find attached hereto the notification in terms of section 21 of the Environmental Impact Assessment Regulations.
>
> Kindly acknowledge receipt of the notification.
>
> Regards
>
> Joel Shafashike
>
> Tel: 081 127 3027
>
> Email: ekwao@iway.na
>
> Box 25021 Windhoek, Namibia
>
> EkwaoConsulting
> EIA • Registration of Mineral Rights • Mining Technical Advice & Guidance

Ekwao Consulting

95 Papageienweg
Hochland Park
WINDHOEK
Namibia

Box 25021
WINDHOEK
Namibia

Tel: 081 418 3125
Mobile:081 127 3027
Fax2Mail:088 645 026
Email: ekwao@iway.na

8 April 2026

Neighbouring Property Owner(s) to Mirabilis Service Station
Erf 2279 Khorixas Proper
KHORIXAS

Dear Sir/Madam

NOTIFICATION IN TERMS OF SECTION 21 OF THE ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS

This letter serves to notify you as follows:

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2. MSS is operating a Caltex branded fuel service station situated on Erf 2279 Khorixas Proper – the main street passing through Khorixas. In terms of the Environmental Management Act (**EMA**), (Act No. 7 of 2007), MSS is required to have a valid ECC, permitting its operational activities.
3. As directed by MEFT, Ekwao is hereby notifying the neighbouring property owner(s) of MSS regarding the ECC application.
4. Attached hereto is the Screening Notice received from MEFT outlining the documents required to accompany MSS's formal ECC application.

Thanking you

Joel Shafashike
Member - Ekwao Consulting

Received by: Gerard Conley Held

Physical Address: Justus Garoeb Ave
Khorixas

Date: 3 April 2026 Signature:

- Declaration for the Submission of Assessment Reports and other Support Documents (upload Declaration Form from www.eia.meft.gov.na (downloads)
- Proof of written notice to the owners and occupiers of land adjacent to the site where the activity is or is to be undertaken or to any alternative site
- Proof of written notice to the local authority council, regional council and traditional authority, in which the site or alternative site is situated; and consent obtained
- Upload proof of payment (Revenue Stamps)

Please login onto our portal to upload required documents, if any
https://eia.met.gov.na

NB- for the purpose of Section 38 of the Environmental Management Act, 2007 read with Regulation 4(d), kindly forward copies of all relevent documents i.e (application forms, EIA, Scoping reports, EMP etc) to the office of the Environmental Commissioner

Thank you

Phillip Troskie Building
P/Bag 13306, Windhoek | Tel: +264 61 284 2111 | DEA: +264 61 284 2701

Ekwao Consulting

95 Papageienweg
Hochland Park
WINDHOEK
Namibia

Box 25021
WINDHOEK
Namibia

Tel: 081 418 3125
Mobile:081 127 3027
Fax2Mail:088 645 026
Email: ekwao@iway.na

8 April 2026

Neighbouring Property Owner(s) to Mirabilis Service Station
Erf 2279 Khorixas Proper
KHORIXAS

Dear Sir/Madam

NOTIFICATION IN TERMS OF SECTION 21 OF THE ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS

This letter serves to notify you as follows:

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3. As directed by MEFT, Ekwao is hereby notifying the neighbouring property owner(s) of MSS regarding the ECC application.
4. Attached hereto is the Screening Notice received from MEFT outlining the documents required to accompany MSS's formal ECC application.

Thanking you

Joel Shafashike
Member - Ekwao Consulting

Received by: Maria Ashipala

Physical Address: Gottfried & Simon Street
Erf 2279
KHORIXAS

Date: 10 April 2026 Signature:

Joel Shafashike

From: Ministry of Environment and Tourism <noreply@meft.gov.na>
Sent: Monday, 6 April 2026 8:10 pm
To: Joel Shafashike
Subject: Your application is verified

REPUBLIC OF NAMIBIA
Ministry of Environment, Forestry & Tourism

2026-04-06

Dear Joel Shafashike,

This email serves to inform you that your application APP-007270 has been verified

Taking the following into considerations:

- Location of the project
- Polution potential
- Scale of operation of the project

Please upload the following documments:

- EMP
- Confirmation of screening notice received (through email) in terms of assessment procedures (Section 35 (1)(a)(b) of the Environmental Management Act, No 7 of 2007)
- Preliminary Site Map (Project boundaries) with coordinates (decimal degrees) and a Legend
- CV of Environmental Assessment Practitioner (EAP)

- Declaration for the Submission of Assessment Reports and other Support Documents (upload Declaration Form from www.eia.meft.gov.na (downloads)
- Proof of written notice to the owners and occupiers of land adjacent to the site where the activity is or is to be undertaken or to any alternative site
- Proof of written notice to the local authority council, regional council and traditional authority, in which the site or alternative site is situated; and consent obtained
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Please login onto our portal to upload required documents, if any
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Thank you

Phillip Troskie Bulding
P/Bag 13306, Windhoek | Tel: +264 61 284 2111 | DEA: +264 61 284 2701