

Environmental Management Plan (EMP)

Project: Selective harvesting of dead wild olive (*Olea europaea* subsp. *africana*)

Location: Farm Tiberian, Otavi Mountain Land, ~10 km from Otavi along the B8 towards Grootfontein; access via D2820 (± 2 km from junction)

Proponent: Tiberian Farming (Pty) Ltd

Environmental Assessment Practitioner (EAP): Augite Environmental Consultants cc

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Executive Summary

This Environmental Management Plan (EMP) sets out the environmental, social, health and safety (ESHS) management measures for the proposed **selective harvesting of dead wild olive** on **Farm Tiberian**. The EMP is intended to: (i) prevent or minimise adverse impacts; (ii) enhance positive outcomes; (iii) ensure legal compliance under Namibia's Environmental Management Act (No. 7 of 2007) and associated regulations; and (iv) provide a practical, auditable framework for planning, operations, monitoring, emergency response and closure.

Key commitments include harvesting **dead** trees only; retaining a significant proportion of coarse woody debris (CWD) for ecosystem function; avoiding sensitive habitats (karst features, riparian zones, protected trees, active nests or dens); strict fire prevention; minimal soil disturbance; and a transparent stakeholder engagement and grievance mechanism. Impacts are assessed as **low to very low significance** after mitigation, with **local socio-economic benefits** (temporary jobs, income) considered **positive**.

1. Introduction and Objectives

The EMP translates assessment findings and stakeholder inputs into actionable and measurable management requirements. Objectives are to: - Ensure **regulatory compliance** and conformance with good industry practice for low-impact harvesting.

- Protect **biodiversity**, soil and water resources, and ecosystem services.
- Safeguard **worker and community health and safety**.
- Establish **roles, responsibilities, monitoring indicators**, and reporting lines.
- Provide a basis for **adaptive management** and periodic auditing.

This EMP is a living document and will be updated if monitoring evidences new risks, if legal requirements change, or if authorities request amendments.

2. Legal and Policy Framework

National legislation and guidance (indicative): - Environmental Management Act (EMA) **No. 7 of 2007** and **EIA Regulations** [Government Notice No. 30 of 2012]. - **Forest Act No. 12 of 2001** and implementing regulations (permits for harvesting/transport of forest produce; protection of specified species and forest resources). - **Water Resources Management Act No. 11 of 2013** (protection of water resources and aquifers) and relevant guidelines. - **Labour Act No. 11 of 2007** and regulations (occupational health and safety; working conditions). - **Public and Environmental Health Act No. 1 of 2015** (nuisance, sanitation, communicable diseases). - **Road Traffic and Transport Act No. 22 of 1999** (vehicle licensing and road safety). - **National Heritage Act No. 27 of 2004** (chance finds of heritage/archaeological materials). - Relevant **regional and local authority by-laws** (Otavi Town Council; Otjozondjupa Regional Council).

International good practice (guidance): - IFC Performance Standards (PS1 Assessment and Management of E&S Risks; PS6 Biodiversity Conservation) – as good-practice benchmarks for proportional risk management.

Note: The proponent must obtain and keep on file all **applicable permits/authorisations** (e.g., forestry/transport permits where required) before operations and during transport/sale of forest produce.

3. Project Description

Activity: Selective, small-scale harvesting of **dead** *Olea europaea* subsp. *africana* (wild olive) stems and fallen logs. No felling of live trees.

Methods: Primarily manual cutting and collection; limited use of light vehicles or tractor/trailer along existing tracks; no new roads unless authorised.

Scale and duration: Seasonal/episodic harvesting, limited footprint (specify hectares/compartments); daily workforce [X–Y persons].

Ancillary activities: Temporary stacking/stockpiling; loading onto vehicles; transport via farm tracks to B8.

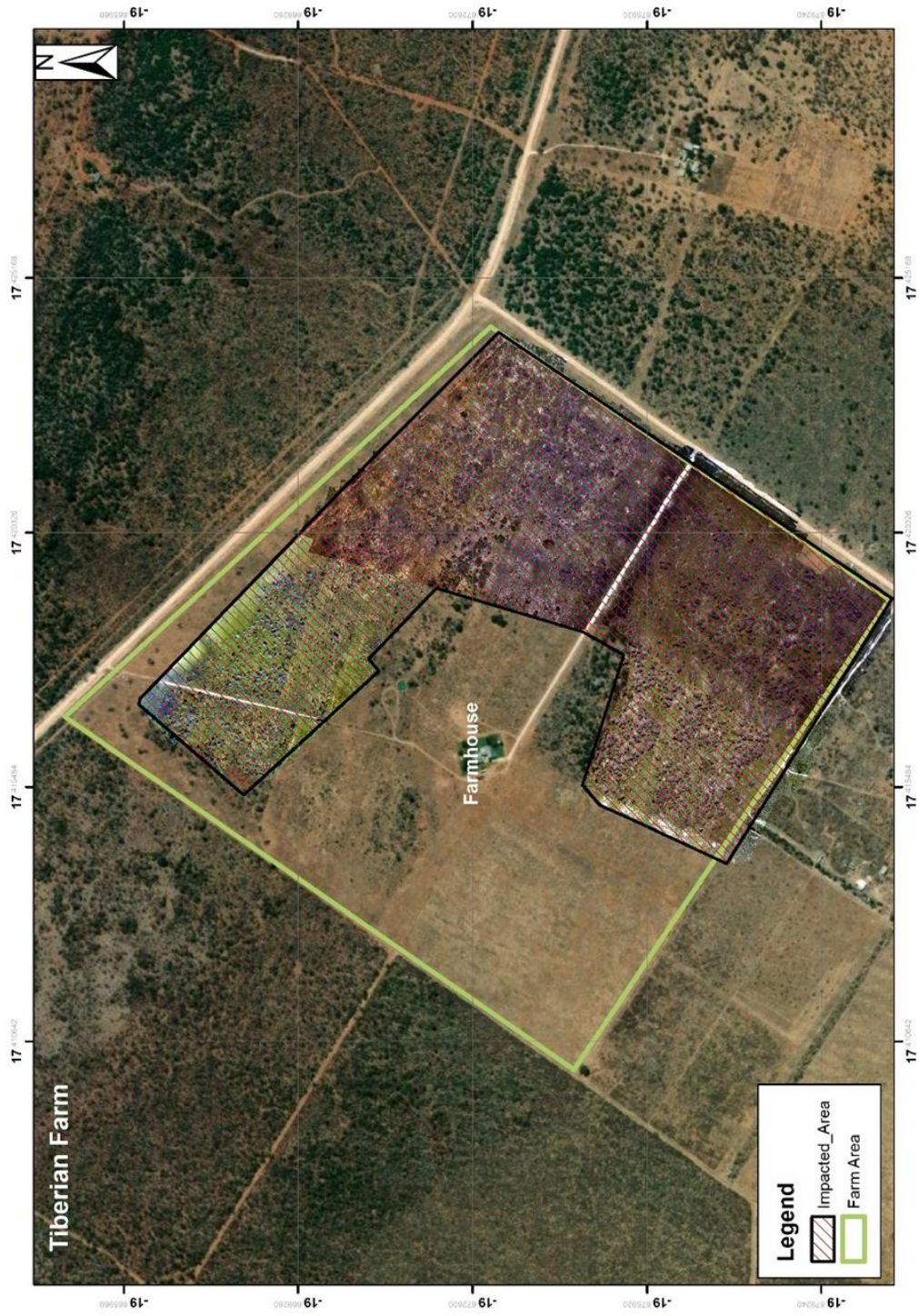
No-go constraints: Sensitive riparian buffers, karst features (dolines/sinkholes), active raptor nests, dens, protected plants/trees, cultural heritage sites.

Alternatives considered: - **Activity alternatives:** (i) No-go (environmental baseline remains unchanged; no economic benefit); (ii) Harvesting **dead wood only** (preferred; lowest ecological risk); (iii) Harvesting live wood (rejected; unnecessary impact).

- **Location/layout:** Use of existing tracks and previously disturbed areas; avoid new cut-lines.

- **Technology:** Hand tools and chainsaws vs heavy machinery; the former preferred for low impact.

- **Timing:** Dry season operations minimise soil rutting but raise fire risk—mitigated via strict fire control; avoid sensitive breeding seasons if nesting detected.



4. Baseline Environment

4.1 Biophysical context

- **Regional setting:** Otavi Mountain Land—characterised by carbonate (dolomite/limestone) geology, karst features, shallow to moderately deep calcareous soils, and intermittent drainage lines.
- **Climate:** Semi-arid, hot summers, cool/dry winters; summer rainfall regime with inter-annual variability. Windy/dry spells can elevate wildfire risk and dust generation.
- **Topography and geomorphology:** Undulating terrain with low ridges and rocky outcrops; localised slopes and shallow soils create erosion susceptibility if disturbed.
- **Hydrology/hydrogeology:** Karstic aquifers with high vulnerability to contamination and rapid recharge along features (dolines, sinkholes, losing streams). Surface water is ephemeral; groundwater is strategic—protect **buffer distances** around boreholes and karst features.

4.2 Biodiversity and habitats

- **Vegetation structure:** Semi-arid woodland/savanna with **wild olive** as a frequent component on rocky slopes and dolomitic substrates. Associated woody species may include *Vachelia/Senegalia* spp., *Combretum* spp., and shrubs adapted to calcareous soils.
- **Ecosystem functions of dead wood:** Coarse woody debris (CWD) provides habitat (invertebrates, reptiles, small mammals), nutrients, and moisture retention; complete removal can reduce habitat complexity.

- **Species of concern:** Protected flora/trees (as per Forestry regulations) and nesting raptors or other sensitive fauna—**survey prior to harvesting**.
- **Invasive species:** Disturbance can facilitate opportunists (e.g., *Opuntia*, *Prosopis* in some areas)—monitor and manage.

4.3 Socio-economic environment

- **Land use:** Mixed agriculture and livestock; scattered homesteads/farmsteads; low population density.
- **Economy and employment:** Farm-based livelihoods; project provides short-term jobs (harvesters, drivers, ECO assistant).
- **Infrastructure and services:** Access via B8/D2820; mobile coverage variable; nearest town **Otavi** supplies health, fuel, and emergency services.
- **Cultural heritage:** Possible archaeological/heritage materials; implement **chance finds procedure** (Section 11.6).

5. Impact Assessment Methodology

Impacts are evaluated using a standard significance matrix that combines: **Magnitude (Very Low–High)**, **Extent (Site–Regional)**, **Duration (Short–Long term)**, **Probability (Unlikely–Likely)**, and **Reversibility/Irreplaceability**. **Residual significance** is rated **Negligible/Very Low/Low/Moderate/High** after mitigation. Cumulative impacts are considered at site and landscape scales.

Mitigation hierarchy: Avoid → Minimise → Rehabilitate/Restore → Offset (offsets not anticipated given low-impact scope).

6. Impact Identification and Assessment

6.1 Planning & design phase

- **Stakeholder exclusion risk:** If I&APs are not adequately informed.
Significance (unmitigated): Low → **Mitigated:** Very Low (use Reg. 21–22 process).
- **Legal non-compliance risk:** Permits not obtained; unclear roles.
Significance: Moderate → **Mitigated:** Very Low (clear compliance plan, Section 10).

6.2 Operational harvesting phase

- **Biodiversity:** Accidental felling of live trees; over-removal of CWD; disturbance of nests/dens.
Significance: Moderate (local) → **Mitigated:** Low–Very Low (strict protocols; retention thresholds).
- **Soils & erosion:** Rutting/compaction on slopes or wet soils; minor topsoil loss.
Significance: Low–Moderate → **Mitigated:** Very Low (seasonal timing; track discipline; hand tools).
- **Hydrogeology:** Contamination risk near karst/boreholes from fuels/lubricants.
Significance: Low–Moderate → **Mitigated:** Very Low (buffers; drip trays; spill kits).
- **Air & noise:** Localised dust from vehicles; chainsaw noise.
Significance: Low → **Mitigated:** Very Low (speed limits; daylight-only operations; maintained silencers).
- **Fire risk:** Sparks, cigarettes, hot work.
Significance: Moderate → **Mitigated:** Low–Very Low (firefighting equipment, red-flag day rules).

- **Traffic & road safety:** Increased turning movements onto B8; load security.
Significance: Low–Moderate → **Mitigated:** Very Low (signage, trained drivers, compliant vehicles).
- **Waste:** Packaging, oil rags, general refuse.
Significance: Low → **Mitigated:** Very Low (segregation, licensed disposal, no on-site burial/burning).
- **Health & safety:** Cuts, falls, hearing loss; snakebite.
Significance: Moderate → **Mitigated:** Low–Very Low (PPE, training, first aid, toolbox talks).

6.3 Cumulative impacts

Given the small footprint and selective nature, cumulative effects are expected to be **very low** if **retention thresholds** for dead wood and **buffers** are respected and if multiple land users apply similar controls.

7. Mitigation and Management Measures (Detailed)

7.1 Spatial planning and buffers

- Establish **no-go buffers** prior to operations:
 - ≥ 100 m from boreholes and obvious karst openings (dolines/sinkholes).
 - ≥ 30 m from ephemeral drainage lines and riparian vegetation.
 - **Species-specific** buffers for active raptor nests or dens as directed by ECO (typically ≥ 50 –100 m).

- Use **existing tracks**; any new track requires ECO approval and micro-siting to avoid sensitive features.

7.2 Harvesting rules (biodiversity safeguards)

- **Dead-only policy:** Fell/collect **dead standing or fallen wood**; **no live trees** may be cut.
- **Retention thresholds:** Maintain **≥30% by volume** of coarse woody debris (CWD) **per hectare** to sustain habitat complexity.
- **Structural diversity:** Retain large-diameter snags/stubs preferentially as wildlife habitat unless they present an immediate safety risk.
- **Selective micro-siting:** Avoid micro-habitats (termite mounds, rock crevices with herpetofauna, active burrows).
- **Protected species:** If any protected flora are encountered, demarcate and avoid; notify Directorate of Forestry if required.

7.3 Soil and erosion control

- Harvest **in dry conditions** to reduce rutting; suspend work if soil moisture leads to visible rutting >5 cm.
- Keep vehicles on existing tracks; turning bays in previously disturbed areas only.
- Where minor rilling occurs, conduct **micro-rehabilitation** (rake-in, brush-packing, water bars on slopes).

7.4 Pollution prevention

- Refuelling/maintenance on **impervious drip trays**; spill kits available and staff trained.

- No decanting within buffers; collect and remove oily wastes to licensed facilities.
- Greywater from camps (if any) managed per Public & Environmental Health requirements.

7.5 Air quality and noise

- **Speed limit:** ≤ 30 km/h on farm tracks to reduce dust.
- Maintain chainsaws with functional mufflers; operate during **daylight hours only**.
- Provide **hearing protection** to operators; enforce use.

7.6 Fire management

- Equip each work team with **fire beaters**, **backpack sprayers** (or extinguisher equivalents) and a **charged water bowser** nearby when feasible.
- **No open fires** for cooking; designated safe area for smoking with butt-receptacles.
- **Red-flag weather** (high wind/heat): implement stop-work or enhanced vigilance per ECO/forestry guidance.
- Maintain **fire breaks** along main access tracks where practicable, subject to landowner approval.

7.7 Traffic and road safety

- Pre-start vehicle checks; valid licences; load **netting/strapping**; no overloading.
- Install **temporary warning signage** at farm exits; ensure safe sight distances.
- Journey management plan for longer hauls; driver hours limits; fatigue management.

7.8 Waste and materials management

- Provide labelled receptacles: **general** and **hazardous** (oily rags, filters).
- Weekly removal to licensed facilities (Otavi).
- Absolutely **no dumping or burning** on site.
- Encourage **minimal packaging** and reuse of pallets where applicable.

7.9 Health, safety and welfare

- **Induction** covering hazards, PPE, first aid, snake awareness, sun exposure.
- PPE: safety boots, gloves, eye protection, **hearing protection**, chainsaw chaps for operators, high-visibility vests for traffic zones.
- **First-aid kits** and trained first-aiders on each crew; emergency **muster point** demarcated.
- **Potable water** supply, shade breaks, and sanitation facilities compliant with health regulations.

7.10 Social performance and grievance

- Maintain open communication with neighbours and Otavi Town Council.
- Post a **grievance mechanism** (contact details on notices; log and resolve within 14 days).
- Prioritise **local recruitment and procurement** where feasible; enforce a code of conduct.

8. Monitoring, Indicators and Reporting

8.1 Key Performance Indicators (SMART)

Aspect	Indicator	Target/Threshold	Method/Frequency	Responsibility
Compliance	All required permits on file and valid	100%	Pre-start, quarterly audit	Proponent/ECO
Live tree protection	Number of live trees cut	0 (zero-tolerance)	Daily tally; weekly ECO check	Supervisor/ECO
CWD retention	% CWD volume retained per hectare	≥30%	Transect counts/monthly	ECO
Buffers	No-go buffer breaches	0	Flag checks/daily	Supervisor
Soil disturbance	Rut depth on tracks	≤5 cm ; suspend if exceeded	Daily	Supervisor
Spills	Spill incidents > 5 L	0 ; all spills <5 L contained	Immediate reporting; monthly summary	Supervisor/ECO
Dust	Track speed compliance	≤30 km/h	Spot checks	Supervisor
Noise	Daylight-only operations	100% compliance	Daily	Supervisor

Aspect	Indicator	Target/Threshold	Method/Frequency	Responsibility
Fire	Fire incidents	0	Continuous; monthly report	All
H&S	Lost-time injury frequency (LTIFR)	0	Monthly	H&S Officer
Waste	Offtake dockets to licensed site	100% loads documented	Weekly	Supervisor
Grievances	Number resolved in 14 days	≥95%	Monthly	Proponent

8.2 Monitoring tools

- **Checklists** (daily/weekly) for biodiversity, soil, waste, H&S (Annexures A–D).
- **Photo-monitoring points** before/after in representative compartments.
- **GIS record** of harvested areas, buffers, and sensitive features.

8.3 Reporting

- **Monthly ECO report** summarising indicators, incidents, corrective actions.
- **Quarterly internal audit** against EMP; corrective action plan with deadlines.
- **Immediate notification** to authorities of material incidents (fires, significant spills, heritage finds) per legal requirements.

9. Roles, Responsibilities and Competency

9.1 Organisational roles

- **Proponent (Project Manager):** Overall accountability; ensures resourcing, permits, and compliance; approves corrective actions.
- **Environmental Control Officer (ECO):** Independent oversight; conducts inspections, training, reporting; stop-work authority on material non-compliance.
- **Supervisor/Foreman:** Implements daily controls; toolbox talks; record-keeping.

- **H&S Officer (may be combined with Supervisor in small teams):** Risk assessments, incident investigations, PPE and training.
- **Operators/Workers:** Comply with procedures; report hazards/near-misses; care for equipment and environment.
- **Specialists (as needed):** Botanist/ornithologist for sensitive species; geohydrologist for karst queries.

9.2 Competency and training

- Induction (environmental & H&S), chainsaw certification, defensive driving (for drivers), first-aid level 1, fire-fighting basics, spill response.

10. Compliance Management

- **Permit register** (issue date, conditions, renewal dates).
- **Legal register** mapping obligations to procedures.
- **Contractor management:** Include EMP clauses in contracts; induction before site access.
- **Record keeping:** Keep for ≥ 5 years: permits, inspection sheets, waste dockets, training records, grievance log, incident reports.
- **Corrective and Preventive Actions (CAPA):** Track to closure with responsibility and due dates.

11. Emergency Preparedness and Response (EPR)

11.1 Risk scenarios

- **Wildfire, vehicle accident, personal injury, hazardous spill, severe weather, wildlife encounter** (snakebite).

11.2 Resources and communication

- Emergency **contact list** (Otavi clinic/hospital, Fire Brigade, MEFT Forestry, NamPol, landowner).
- Two-way radios or mobile phones; designate **Muster Point** and **Emergency Coordinator**.

11.3 Response protocols

- **Fire:** Raise alarm → call emergency services → deploy beaters/backpack sprayers → evacuate non-essential staff → fight fire from leeward side if safe. Create anchor lines; never attack upslope without safety.
- **Injury:** Stop-work → first aid → transport to clinic/hospital; record incident; notify authorities if notifiable.
- **Spill:** Stop source → contain with absorbents/berms → recover contaminated soil → store as hazardous waste → report per thresholds.
- **Vehicle accident:** Secure scene → warn traffic → first aid → notify police → incident report.
- **Severe weather:** Suspend operations for high winds, lightning, or heavy rain.
- **Snakebite:** Immobilise patient, keep calm, rapid transport; **no tourniquets or cutting**; record species if safely identifiable.

11.4 Drills and readiness

- Conduct at least **two drills per season** (one fire, one medical/spill).
- Inspect and service extinguishers quarterly; check first-aid kits monthly.

11.5 Incident investigation

- Root-cause analysis within 48 hours; implement CAPA; share lessons in toolbox talks.

11.6 Chance finds procedure (heritage)

- Stop work in a **10–30 m radius**; secure area; notify ECO and National Heritage Council.
- No collection/removal; resume only after clearance from authorities.

12. Stakeholder Engagement and Information Disclosure

- Maintain an **Interested & Affected Parties (I&AP) register** (Reg. 22).
- Provide **notification letters/notices** (Otavi Town Council; neighbours; conservancies where relevant).
- Keep a **comments-and-responses register (CRR)**; integrate commitments into EMP.
- Provide contact channels for grievances (phone/email/WhatsApp); record and close out.

13. Implementation Schedule and Budget (Indicative)

- **Pre-start (Month 0–1):** Permits, training, demarcation, baseline photos.
- **Operations (Month 1–12+):** Harvest cycles with monitoring and monthly ECO reports.
- **Audits:** Quarterly internal; annual management review.
- **Budget lines:** ECO services; training; PPE; spill/fire equipment; waste disposal; monitoring (transects, GIS); emergency drills.
- Maintain **contingency (10–15%)** for corrective actions.

14. Decommissioning/Seasonal Closure and Rehabilitation

- Remove all wastes and temporary infrastructure; service tracks (water bars/brush-pack).
- Verify **CWD retention** and re-establish micro-habitat where lacking.
- Update GIS with harvested compartments; photo-monitoring “after” set.
- Close-out inspection by ECO; issue **Completion Statement**.

15. Conclusions

With the above measures—particularly **dead-only harvesting, CWD retention, buffer protection, fire safety, and robust monitoring**—the project’s residual impacts are assessed as **very low to low and manageable**, while delivering **local socio-economic benefits**. Continuous improvement and adaptive management are embedded through KPIs, audits, and stakeholder feedback.

16. Abbreviations

- CAPA – Corrective and Preventive Action
- CWD – Coarse Woody Debris
- ECO – Environmental Control Officer
- EHS – Environmental, Health and Safety
- EMP – Environmental Management Plan
- EPR – Emergency Preparedness and Response
- IFC – International Finance Corporation
- I&AP – Interested and Affected Party
- KPI – Key Performance Indicator
- MEFT – Ministry of Environment, Forestry and Tourism
- PPE – Personal Protective Equipment

17. References (selected)

- Government of the Republic of Namibia: Environmental Management Act (No. 7 of 2007) and EIA Regulations (GN No. 30 of 2012).
- Forest Act (No. 12 of 2001) and regulations.
- Water Resources Management Act (No. 11 of 2013).
- Labour Act (No. 11 of 2007).
- Public and Environmental Health Act (No. 1 of 2015).
- National Heritage Act (No. 27 of 2004).
- IFC Performance Standards (2012, as updated).

Annexures

Annexure A: Daily Environmental & H&S Checklist (Field)

Date/Compartment: ____ **Supervisor:** ____ **ECO:** ____

1. Permits on site? (Y/N)
2. Crew inducted & PPE worn? (Y/N)
3. Buffers demarcated & respected? (Y/N)
4. Any live trees felled? (must be 0)
5. CWD retention $\geq 30\%$ verified (spot check)? (Y/N)
6. Track rutting ≤ 5 cm? (Y/N)
7. Spill kits present & complete? (Y/N)
8. Fire equipment present & functional? (Y/N)
9. Waste segregation bins in place? (Y/N)
10. Incidents/near-misses recorded? (Y/N; attach sheet)

Annexure B: Incident/Spill Report Form

- **Time/Date:** _____
- **Location:** _____
- **Type:** Injury / Fire / Spill / Vehicle / Other
- **Description & Root Cause:** _____
- **Immediate Actions:** _____
- **Corrective/Preventive Actions (CAPA):** _____
- **Reported to:** [Authority] on [Date/Time]
- **Closed by:** _____ on _____

Annexure C: Grievance Log Template

ID	Date	Complainant	Contact	Issue	Actions	Status	Closure Date
				Summary	Taken		

Annexure D: Training Register

Name	Role	Induction	Chainsaw Cert	First Aid	Firefighting	Date
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Annexure E: Seasonal Audit Checklist (ECO)

- Legal & permit register updated.
- KPI performance (Section 8) reviewed; trends analysed.
- CAPA effectiveness verified.
- Stakeholder engagement & grievance resolution evaluated.
- Recommendations for adaptive management documented.

Master Mitigation & Monitoring Matrix (Consolidated)

Phase	Aspect/Impact	Mitigation/Management	KPI/Threshold	Monitoring & Frequency	Responsibility
Planning	Legal compliance	Obtain/retain all permits; include EMP clauses in contracts	100% permits valid	Pre-start; quarterly	Proponent
Planning	Stakeholder engagement	Reg. 21–22 notifications; I&AP register; CRR	Notices issued; CRR maintained	Pre-start; updates	EAP/Proponent
Operations	Biodiversity	Dead-only harvest; $\geq 30\%$ CWD; avoid nests/dens; protected species avoidance	Live trees cut = 0	Daily; weekly ECO	Supervisor/ECO
Operations	Soil/erosion	Dry-season work; track discipline; micro-rehab	Rut depth ≤ 5 cm	Daily	Supervisor
Operations	Water/karst	100 m borehole buffer; 30 m	Buffer breaches = 0	Daily	ECO

Phase	Aspect/Impact	Mitigation/Management	KPI/Threshold	Monitoring & Frequency	Responsibility
		drainage buffer; no refuelling inside			
Operations	Air/noise	Speed ≤30 km/h; daylight-only; tool maintenance	Compliance 100%	Spot checks	Supervisor
Operations	Fire	No open fires; red-flag rules; equipment on site	Incidents = 0	Continuous	All
Operations	Traffic	Safe exits; load security; driver competency	Incidents = 0	Daily	Supervisor
Operations	Waste	Segregation; licensed disposal; dockets retained	Dockets 100%	Weekly	Supervisor
Operations	H&S	PPE; first aid; toolbox talks; heat stress management	LTIFR = 0	Monthly	H&S Officer

Phase	Aspect/Impact	Mitigation/Management	KPI/Threshold	Monitoring & Frequency	Responsibility
Closure	Rehabilitation	Remove wastes; service tracks; photo after-set	Close-out signed	Once-off	ECO