GAC INVESTMENT CC

Oil Spill Contigency Plan for the Vessel, Hua Chen 366

The Offshore Fuel Bunkering Operations, on Namibian Marine Waters

June 2025

Document Information

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TABLE OF CONTENTS

TABLE OF FIGURES

LIST OF TABLES

1 INTRODUCTION

This Oil Spill Contingency Plan (hereinafter referred to as OSCP) has been prepared for the vessel, Hua Chen 366, to encompass all dimensions of oil spills occurring on the marine environment and in areas where the vessel will be operating. The accompanying Figure 1 presents a map of the Namibian Exclusive Economic Zone, which this plan duly addresses and covers.

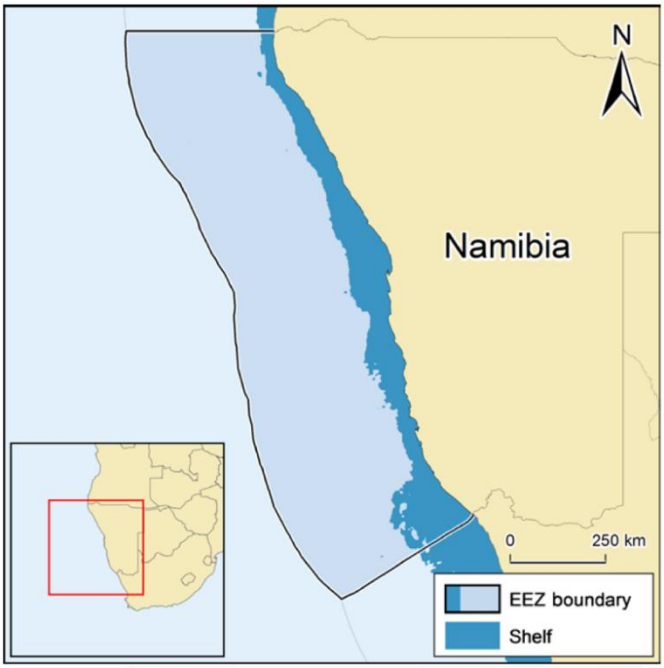

Figure 1: Namibia Exclusive Economic Zone (REF: Fisheries Center, 2015)

The Level of Response (Refer to Figure 2) is applicable, as follows:

- **Tier One:** Spills refer to oil spills for which the in-house response capability is deemed adequate. The environmental impacts are minimal, and a mandated in-house clean-up response is required. Tier 1 is site-specific, encompassing the majority of shore-side industries that involve oil transfer operations, offshore installations, pipelines, and all vessels from which a potential oil spill may occur.
- **Tier Two:** Spills are small or medium-sized spills where significant impacts are possible and area or national support for adequate spill response is required.

- **Tier 2:** Includes oil spills that cannot be handled by in-house Tier 1 capabilities. The Tier 2 must be able to respond to a spill 24-hours a day, 7 days a week and must immediately mobilize upon notification of an oil spill.
- **Tier Three:** Spills are normally large spills requiring substantial resources and support from regional or international oil spill co-operatives to mitigate effects perceived to be wide-reaching, i.e., of national or international significance.

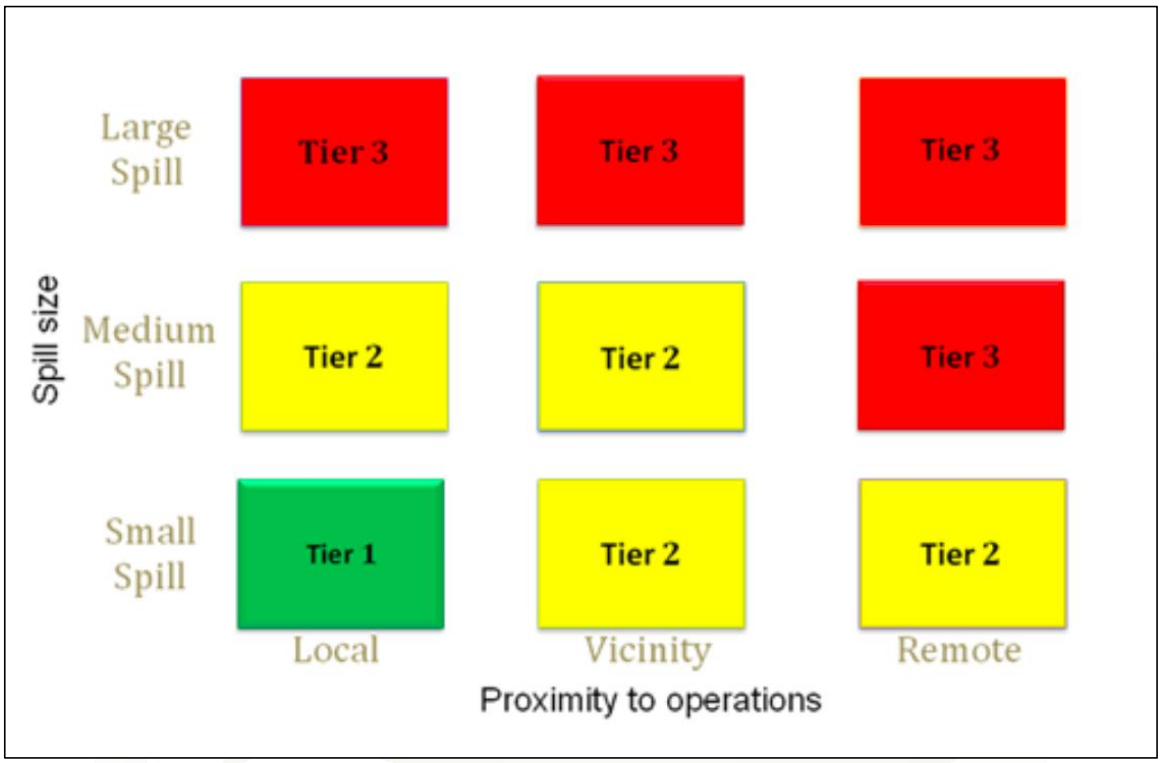

Figure 2: Tiers Defined (REF: IPIECA)

1.1 Objective

The purpose of the contingency plan is to delineate responsibilities concerning the operational response to marine emergencies as a result of oil spills. The principal will be to mitigate the threat to human health and protect marine ecosystems, including, but not limited to, seabirds, marine life, fisheries, as well as other economically significant facilities and amenities at risk. The preservation of human life will remain paramount in any decision-making process and response.

Procedures will be instituted to ensure local, national, and regional cooperation in the realms of contingency planning, prevention, control, and remediation.

1.2 Scope

To ensure a prompt and effective response to spills, this Plan:

- Establishes comprehensive reporting, alerting, and assessment systems.
- Identifies the chain of command and delineates associated responsibilities, including the competent authority.
- Implements an “Oil Spill” Records and Information Management System.
- Institutes an incident reporting procedure.
- Catalogs available oil spill equipment, logistical support facilities, and communication capabilities.
- Fosters and sustains collaboration with specialists in the domain of oil spill planning and response.
- Illuminates the complications associated with an oil spill and the corresponding remedial strategies.
- Identifies storage facilities for recovered oil along with appropriate disposal methods;
- Establishes a policy for sub-sea dispersant application and compiles a list of approved sub-sea dispersants.
- Formulates a policy regarding in-situ burning.
- This Plan encompasses the geographical area delineated by the Namibian Exclusive Economic Zone.

2 APPLICABLE ACTS, POLICIES AND INTERNATIONAL CONVENTIONS

The laws and policies that ensure that the marine areas are protected against oil pollution, are as follows:

Table 1: The Applicable Acts, Policies and International Conventions

Act and Policy	Description
Marine Resources Act No. 27 of 2000	Provides for the conservation of the marine ecosystem and the responsible utilization, conservation, protection, and promotion of marine resources on a sustainable basis in Namibia. It also establishes control over marine resources and related matters.
EIA Policy (1995)	This policy states that the principle of achieving and maintaining sustainable development must underpin all policies, programmes and projects under1akcn within Namibia. In particular, the wise utilization of the country's natural re- sources, together with the responsible management of the biophysical environment, must be for the benefit of both present and future generations.
Namibia's Environmental Assessment Policy for Sustainable Development and Environmental Conservation (1995)	Namibia's Environmental Assessment Policy for Sustainable Development and Environmental Conservation, established in January 1995, aims to integrate environmental considerations into all development projects and policies. It broadly defines "environment" to include biophysical, social, economic, cultural, historical, and political components. The policy emphasizes sustainable development, protection of natural and cultural heritage, and responsible resource management for present and future generations.
Namibia Vision 2030.	Namibia's Vision 2030 aims for a "developed" nation with a focus on sustainable development, including the marine environment. This vision incorporates the "blue economy" concept, promoting economic development from marine resources while ensuring environmental protection and social equity.
Policy for the Conservation of Biotic Diversity and Habitat Protection, 1994.	A comprehensive conservation policy that integrates sustainable practices and natural resource management.
Hazardous Substance Ordinance of 1974.	To provide for the control of substances which may cause injury or ill-health to or death of human beings by reason of their toxic, corrosive, irritant, strongly sensitizing or flammable nature.

Pollution Control and Waste Management Bill (3rd Draft September 2003).	This Act promote sustainable development; to provide for the establishment of a body corporate to be known as the Pollution Control and Waste Management Agency; to prevent and regulate the discharge of pollutants to the air, water and land; to make provision for the establishment of an appropriate framework for integrated pollution prevention and control; to regulate noise, dust and odor pollution; to establish a 'system of waste planning and management; and to enable Namibia to comply with its obligations under international law in this regard.
Labour Act, 2007 (No. 11 of 2007).	To establish a comprehensive labour law for all employers and employees; to entrench fundamental labour rights and protections; to regulate basic terms and conditions of employment; to ensure the health, safety and welfare of employees.
Environmental Management, Act 7 of 2007.	To enforce the policy on EIAs, the Environmental Management Act (EMA) (7 of 2007) has been compiled and is regulated by the Ministry of Environment and Tourism (MET). This Act was gazetted on 27 December 2007 (Government Gazette No. 3966) and the Environmental Impact Assessment Regulations: Environmental Management Act, 2007 (Government Gazette No. 4878) were promulgated on 6 February 2012. In terms of this legal framework certain identified activities may not commence without an Environmental Clearance - a certificate that is issued by MET. This environmental clearance can only be granted after consideration of an EIA.
Public and Environmental Health Act No. 1 of 2015.	To provide a framework for a structured uniform public and environmental health system in Namibia.
International Convention	**Description**
International Convention for the Prevention of Pollution from Ships (MARPOL)	MARPOL is the International Convention for the Prevention of Pollution from Ships. It's a crucial international treaty administered by the International Maritime Organization (IMO) aimed at preventing and minimizing pollution of the marine environment from ships.
OPRC Convention (1990)	The 1990 International Convention on Oil Pollution Preparedness, Response and Co-operation (OPRC Convention) aims to enhance international cooperation and mutual assistance in responding to marine oil pollution incidents. It encourages States to develop and maintain the capacity to deal with such emergencies. The convention emphasizes the need for national systems, including designated authorities, operational contact points, and contingency plans, backed by adequate response

	equipment and training.
International Maritime Organization (IMO)	The International Maritime Organization (IMO) is a United Nations specialized agency responsible for regulating international shipping. Its primary goal is to create a framework for safe, secure, and efficient shipping while minimizing pollution from ships. The IMO develops international treaties, codes, and guidelines that member states must implement into their national maritime regulations.
International Convention of the Safety of life at Sea of 1974 (SOLAS)	Convention allows for flag states to compel ships under their flags to comply with safety requirements including fire-fighting equipment in order to prevent impacts associated with risks of transportation of dangerous goods.
Convention on the Prevention of Marine Pollution by dumping of wastes and other matters, 1972 (as amended by the protocol of 1996).	This convention protects the marine environment from human activities such as pollution.
International Convention on Biological Diversity	Among others, this Convention aims at conservation of biological diversity and promote sustainable development of biological components.

3 MITIGATION – MANAGEMENT STRUCTURE FOR OIL SPILL RESPONSE

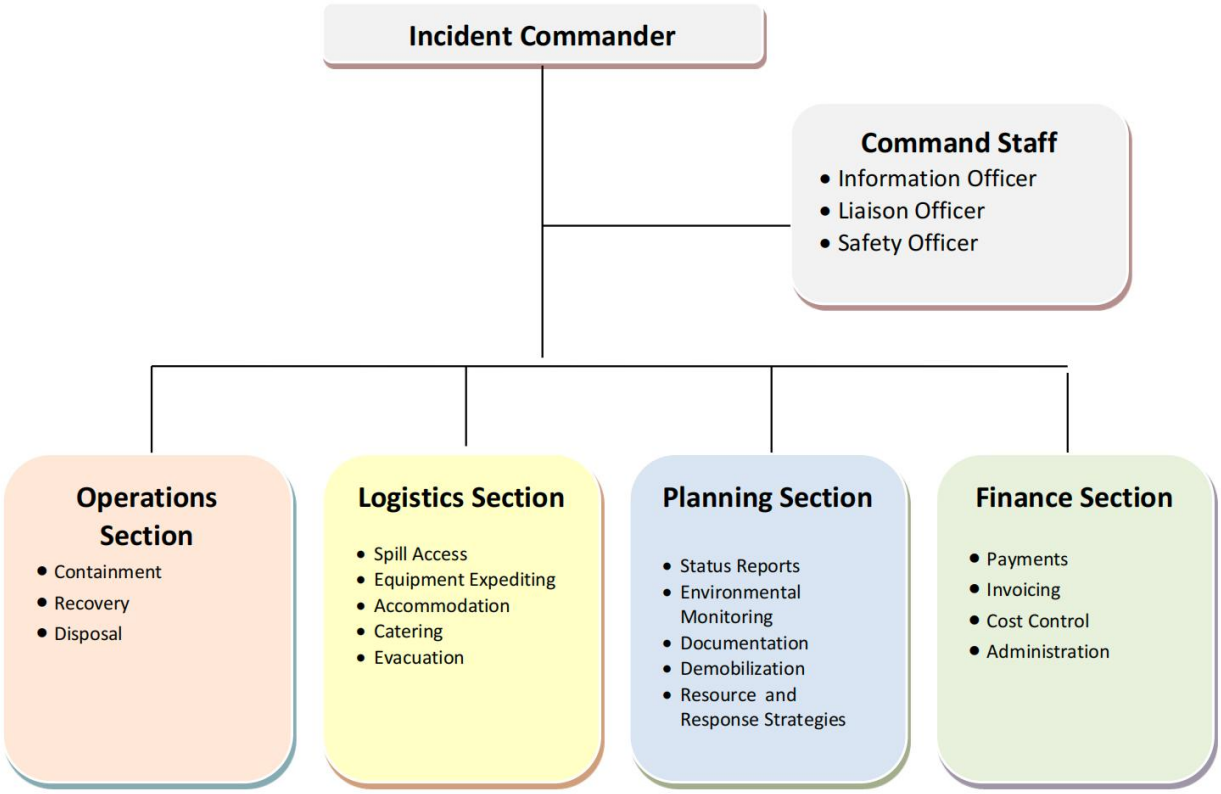

Figure 3: Incident Command System Basic Structure

Oil Spill Command Team	Role
Incident Commander	The Incident Commander bears the overarching responsibility for the response operations and must convene the spill response team, including specialists as deemed necessary. a) For a Tier 1 incident, the Incident Commander is identified as the Responsible Party (RP) for oil spills resulting from bunkering activities. b) In the case of a Tier 2 incident, the Incident Commander will engage in a unified command structure involving the Responsible Party and oil spill containment contractors/specialists. c) For a Tier 3 incident, the Incident Commander will implement a unified command among the oil spill containment contractors/specialists, supported by relevant authorities such as the Ministry of Environment, Forestry and Tourism, the Ministry of Industries, Mines and Energy, and the Ministry of Agriculture, Water and Land Reform.

Information Officer	The Information Officer is tasked with the formulation and dissemination of information pertaining to the incident to the news media, incident personnel, and other relevant agencies and organizations. A singular Information Officer will be designated for each incident, although the Officer may enlist the assistance of additional personnel as deemed necessary.
Health and Safety Officer	The Safety Officer is charged with the critical responsibility of monitoring and evaluating hazardous and unsafe conditions while formulating strategies to ensure personnel safety. This individual will rectify unsafe behaviors or situations through the established hierarchy; however, the Safety Officer is empowered to exercise emergency authority to avert or halt unsafe actions when immediate intervention is imperative. The Safety Officer remains vigilant regarding both active and emerging circumstances, guarantees the preparation and implementation of the Site Safety and Health Plan, and incorporates safety directives into each Incident Action Plan. Only one Safety Officer shall be designated for each incident, although the Safety Officer may enlist assistants as deemed necessary.
Liaison Officer	Incidents that involve multiple agencies may necessitate the establishment of the Liaison Officer position within the Command Staff. The Liaison Officer serves as the primary point of contact for the participating and collaborating agency representatives, as well as stakeholder groups. Only one Liaison Officer shall be designated for each incident, although the Liaison Officer may appoint assistants as deemed necessary.
Operations Section Chief	The Operations Section (OPS) activates and oversees organizational elements in accordance with the Incident Action Plan (IAP) and directs its implementation. The OPS is also responsible for orchestrating the development of unit operational plans, managing the requisition or release of resources, effecting necessary modifications to the IAP, and communicating such changes to the Incident Command (IC). The principal responsibilities of the Operations Section Chief encompass: a) Reviewing Common Responsibilities b) Formulating the operational segment of the IAP. c) Briefing and assigning Operations Section personnel in alignment with the IAP. d) Supervising the Operations Section. e) Assessing needs and requesting additional resources. f) Evaluating the recommended list of resources for release and initiating recommendations for the release of assets. g) Assembling and disassembling strike teams designated to the Operations Section. h) Reporting relevent information regarding special activities, events, and occurrences to the IC.
Planning Section Chief	Responsible for the collection, evaluation, dissemination and use of information about the development of the incident and the status of resources. Information is needed to:

	a) Understand the current situation b) Predict the probable course of incident events; and c) Prepare alternative strategies for the incident. The Planning Section Chief is responsible for collecting, evaluating, and disseminating the tactical information related to the incident, and for preparing and documenting Incident Action Plans (IAPs).
Logistics Section Chief	Responsible for providing facilities, services, and material in support of the incident. The LSC participates in the development and implementation of the Incident Action Plan (IAP) and activates and supervises the Branches and Units within the Logistics Section. The Logistics Section Chief coordinates communications and equipment, personnel and supply movements in a large spill. The LSC activates a mobile command centre and ensures that its operational needs are met. Duties also include the following: a) Spill access b) Equipment expediting c) Accommodation d) Catering e) Evacuation f) Field Coordination and Communications (summon equipment, maintain field communications equipment, coordinate logistic support) g) Arrange for technical and repair services
Finance Section Chief	The Finance and Administrative Staff is responsible for all financial, administrative, and cost analysis aspects of the incident. The Finance Section Chief facilitates financial and other resources, arranges payments and controls invoicing. Ensures on-site cost and recovery accounting, and a chronological record is kept of spill control events.

4 INTERAGENCY AGREEMENTS

Wherever feasible, formal agreements with the relevant Government Agencies shall be meticulously documented to secure the requisite assistance for oil spill preparedness and response.

5 PREPAREDNESS

5.1 Assumptions

In the event of a major oil spill in the marine environment, the following assumptions are made:

- The safety and preservation of life of persons and personnel.
- Early detection mechanism shall be utilized to determine source and size of the spill and to mount an early response to the spill in the Namibian EEZ.
- In the event of extensive oil impacts, a substantial logistical task would be required to organize and sustain the deployment of clean-up personnel and equipment.
- The mounting of a labour-intensive and protracted cleaning operation would quickly absorb the available labour force so that external reinforcement of equipment and personnel would almost certainly be required as a contingency.
- It is likely that the disposal of all of the oily residue and waste will be in Walvis Bay Hazardous Waste Facility.
- For major marine spills, it is recognized that at-sea operations and shoreline protection especially sensitive areas will be the priority and precautionary shoreline treatment operations will be undertaken.
- This plan focuses on the provision of equipment and human resources within the country. This plan also recognizes that external aid will be utilized early when it has been established by the authorities that local capabilities may be exhausted or unable to deal with problem at hand.
- Smaller amounts of oil resulting from minor incidents should be manageable by local resources.

5.2 In-situ Burning

Criteria for in-situ burning are established. The relevant authorities will be responsible for the approval of in-situ burning, unless there are special overriding considerations at the time. It must be noted, however, that for in-situ burning to be safe and effective, it must occur on fresh oil in order to maximize the limited window of opportunity – often within 24-48 hours following a spill.

Safety concerns with regard to the fire and smoke plume must also be considered.It is further emphasized that only approved equipment comprised of fire-resistant booms and igniters are permitted.

6 RESPONSE

6.1 Health and Safety

Personnel health and safety are considerations during incident response, where safety challenges can be more intricate than those encountered during routine industry operations. For instance, the recovery of an oil spill within a watercourse necessitates aquatic operations, exposing personnel to potentially toxic and flammable hazards. The foremost priority in an oil spill response must be spill prevention, and measures must be instituted to mitigate the likelihood of a spill occurring. In the event of a spill incident, the preservation of life takes precedence and should never be jeopardized, irrespective of environmental concerns.

A comprehensive Site Safety and Health Plan shall be prepared and enforced for all responder work sites. Suitable personal protective equipment (PPE) must be in place for all responders in accordance with the identified risks as determined through a thorough risk assessment.

All chemicals utilized must be handled in strict accordance with the directives outlined in their corresponding Material Safety Data Sheets (MSDS). Nighttime operations should be discouraged unless adequate illumination is available to ensure safe working conditions.

Contingency plans must indicate health and safety precautions as well as any company-specific procedures. This encompasses the necessity to identify prevalent information and protocols regarding:

- Toxicology
- Fire and explosion hazards / risk
- Operations safety guidelines
- Personal protective equipment
- Site security
- Personnel safety responsibilities

6.2 Sampling and Fingerprinting

Sampling of oil for fingerprinting analysis—aimed at determining the source of the oil spill, will be conducted by trained specialists. This sampling will also include the assessment of contaminated areas, which may involve the collection of water, sediment, and biological specimens. Comprehensive laboratory analyses of the gathered samples will be required.

The sampling protocol will include the acquisition of an adequate number of samples to ensure that one set can be allocated to the responsible party.

6.3 Clean-up and Disposal of Recovered Oil

Clean up and disposal will be dependent on a number of factors, for example, by the characteristics of the marine environment; by species; by accessibility; by type and volume of spilled material; by equipment available and by human resource availability. A Damage Assessment must be carried out to determine the extent of the impact of the oil spill which will inform the best clean-up strategies and methodologies.

7 PUBLIC RELATIONS

Effective public relations are an integral part of any oil spill clean-up operation. In the event of spillage, the Information Officer will make coordinated arrangements for the dissemination of relevant information to the public and the media to ensure that those who need to know have a full and timely appreciation of the incident and of the actions taken and progress made during the response.

8 RECOVERY

8.1 Restoration and Rehabilitation

Once the clean-up operations have been concluded, it will be required to restore the affected areas. The extent of restoration will be dictated by the relevant local or internationally recognized standards for remediation.

The Incident Commander will therefore:

- Liaise with all interested parties regarding the conduct of the operation and the level of cleanliness appropriate to each location.

- Stand down equipment and order its removal to an appropriate location for cleaning and maintenance.
- Ensure all relevant documentation is completed.
- Prepare final information bulletin.
- Ensure that consumed materials are reordered and that damaged equipment is repaired or replaced.
- Consolidate costs; regularize accounting procedures; prepare financial report.
- Prepare a formal detailed report (to include time and date of termination).
- Address claims for clean-up costs and pollution damage.

8.2 Salvage

Following a serious incidents, part of the decommissioning process may involve the removal of damaged vessels or equipment. GAC will be required to engage salvors to deal with the casualty.

The initial salvage options may include transfer vessels or, other actions to stabilise the vessel, and perhaps emergency towing to bring the casualty to calmer waters or a safe haven for marine incidents.

8.3 Special Deepwater Requirements

It is recognised that when the oil reaches the surface when there is a sub-sea spill, surface response strategies will obtain. Some of the areas of concern that must be addressed in terms of a response for deepwater fall within these categories:

- Sub-sea Dispersant Application and Chemical Management
- Vessel Response Requirements
- Disposal Options

9 REPORTING AND COMMUNICATION

9.1 Vessel Reporting

9.1.1 Ship Masters

Masters, or other persons in charge of vessels shall report, without delay, any sightings of oil on the surface of the water to the authorities.

9.1.2 Ship Owner

Most ship masters are mandated to inform the authorities of any marine pollution emergency that may arise. Typically, this obligation rests with the master of the vessel; however, should the ship be abandoned or if the master's report is incomplete, the responsibility to submit a report may then be taken upon by the shipowner.

9.1.3 Post-Incident Reports

Following resolution of the oil spill and termination of the response for a particular incident, the support agencies involved will be responsible for submission of an After Action Report. The Incident Commander and the Response Agency shall be jointly responsible for submission of a comprehensive After Action Report, incorporating reports from all responsible agencies.

APPENDIX A - CONTACT LIST

To be continuously updated

	Name	Position	Email	Cell/Tel No
GOVERNMENT MINISTRIES				
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Ocean Conservation Namibia(OCN)				
	Damian Schreiber	Field and Research Officer	info@ocnamibia.org	

APPENDIX B

OIL SPILL NOTIFICATION REPORT

INITIAL OIL SPILL NOTIFICATION REPORT – STK8	
COMPANY NAME:	DATE:
Location of Loss -	
Date Discovered:	Time discovered:
Commodity Lost	
Estimated Quantity Lost	Method of Esti mation:
Estimated Recovery	
Estimated Net Loss	
Type and Extent of Pollution :	
Loss First Discovered by :	
Address;	
First Reported to Ministry by:	Date:
Cause of Loss :	
Reason for Loss	
Corrective Measures Taken	
Measures Taken to Prevent Recurrence	
Damage to Equipment Due to Loss -	
Person Injured	Address
Injury	
Person Injured	Address
Injury	
Remarks	
Signed Date	
(for Official use only) Comments of Investigation Officer	
Investigation officer Date	