

GAC INVESTMENT CC

**Environmental Management Plan Report for the Vessel,
Hua Chen 366**

**The Proposed Offshore Fuel Bunkering Operations, on
Namibian Marine Waters**

June 2025



Environmental Management Plan Report

The Proposed Offshore Fuel Bunkering Operations – GAC Investment cc

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CONSULTANT'S EXPERTISE

I.N.K Enviro Consultants cc is the independent firm of consultants that has been appointed by GAC Investment cc (GAC) to undertake the environmental impact assessment process.

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DECLARATION OF INDEPENDENCE AND DISCLAIMER

The consultant herewith declare that this report represents an independent, objective assessment of the environmental impacts associated with the activities of the proposed offshore fuel bunkering operations on the request of GAC.

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

DISCLAIMER

The information, statements and commentary contained in this Report have been prepared by I.N.K from information provided by GAC and a site visit dated 04/06/2025. I.N.K does not express an opinion as to the accuracy or completeness of the information provided, the assumptions made by the party that provided the information, or any conclusions reached. I.N.K has based this Report on information received or obtained, on the basis that such information is accurate and, where it is represented to I.N.K as such, complete.

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LIST OF ACRONYMS, ABBREVIATIONS AND UNITS

EAPAN	Environmental Assessment Professionals of Namibia
EAPs	Environmental Assessment Practitioners
ECC	Environmental Clearance Certificate
EIA	Environmental Impact Assessment
EMA	Environmental Management Act
EMP	Environmental Management Plan
EEZ	Namibian Exclusive Economic Zone
GAC	GAC Investment cc
I.N.K	I.N.K Enviro Consultants cc
IMO	International Maritime Organization
MAFWLR	Ministry of Agriculture, Fisheries, Water and Land Reform
MARPOL	International Convention for the Prevention of Pollution from Ships
MEFT	Ministry of Environment, Forestry and Tourism
MGO	Marine Gas Oil
MIME	Ministry of Industries, Mines and Energy
NTA	Namibia Training Authority
OPRC	International Convention on Oil Pollution Preparedness, Response and Co-operation
STS	Ship-to-Ship
VLSFO	Very Low Sulfur Fuel Oil

1 INTRODUCTION

1.1 Introduction to the Proposed Activities

GAC Investment cc (hereinafter referred to as “GAC”) intends on obtaining an Environmental Clearance Certificate (ECC) for their proposed offshore bunkering operations on Namibian marine waters using a bunker supply vessel equipped for Ship-to-Ship (STS) fuel transfers. The operation will include importing “Very Low Sulfur Fuel Oil” (VLSFO) & “Marine Gas Oil” (MGO) into Namibian waters and performing refueling activities for international commercial & local vessels at anchorage. The fuel will be pumped from the bunker tanker to the client vessels using approved transfer hoses, fenders, and spill response equipment, complying with International Maritime Organization (IMO) and International Convention for the Prevention of Pollution from Ships (MARPOL) standards.

The proposed offshore fuel bunkering operations will be conducted within the Namibian Exclusive Economic Zone (EEZ) (Figure 1), particularly near Walvis Bay and Lüderitz designated anchorage points.

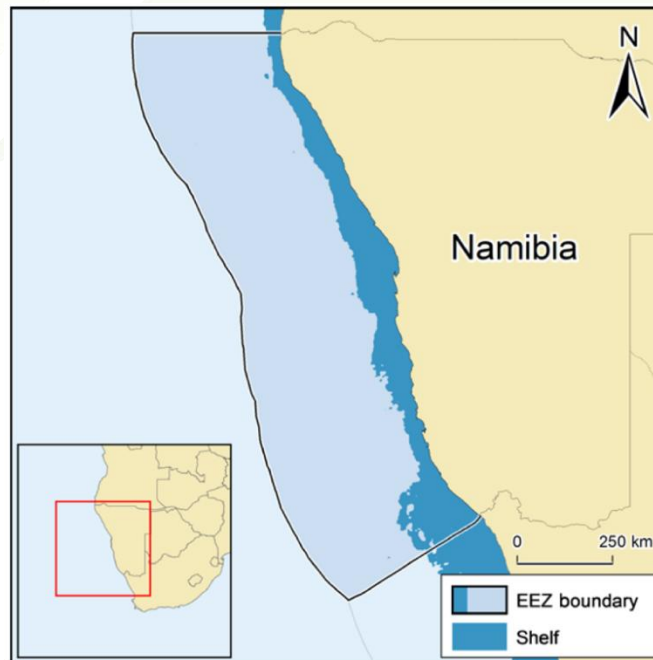


Figure 1: Namibia Exclusive Economic Zone (REF: Fisheries Center, 2015)

1.2 Environmental Management Plan (EMP)

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

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

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

EMP implementation is a cyclical process that converts mitigation measures into actions and through cyclical monitoring, auditing, review and corrective action, ensures conformance with stated EMP aims and objectives. Through monitoring and auditing, feedback for continual improvement in environmental performance must be provided and corrective action taken to ensure that the EMP remains effective.

1.3 As Low As Reasonably Possible (ALARP) Principle

For a risk to be ALARP, it must be possible to demonstrate that the cost involved in reducing the risk further would be grossly disproportionate to the benefit gained. The ALARP principle arises from the fact that infinite time, effort and money could be spent in the attempt of reducing a risk to zero; not the fact that reducing the risk in half would require a finite time, effort and money. It should not be understood as simply a quantitative measure of benefit against detriment. It is more a best common practice of judgement of the balance of risk and societal benefit.

2 IDENTIFICATION OF APPLICABLE ENVIRONMENTAL GUIDELINES

2.1 Introduction

The Republic of Namibia has five tiers of law and several policies relevant to environmental assessment and protection, which include:

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

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

2.2 Line Ministries and Parastatals

The following line ministries are applicable:

2.2.1 Ministry of Environment, Forestry and Tourism.

The MEFT's Department of Environmental Affairs ("DEA") is mandated to give effect to Article 95 of the Constitution by promoting environmental sustainability. The Environmental Commissioner serves as head of the DEA, responsible for, inter alia, the administration of the EIA process undertaken in terms of the Environmental Management Act, 2007 and the EIA Regulations 2012. The DEA will be responsible for issuing a decision on the application for an ECC, based on the recommendations from MFMR and MME. If approved, the DEA will issue an Environmental Clearance Certificate (ECC).

2.2.2 Ministry of Agriculture, Fisheries, Water and Land Reform (MAFWLR)

Promote, Develop, Manage and utilize Agriculture, Water and Land Resources sustainably.

2.2.3 Ministry of Industries, Mines and Energy (MIME)

Approves bunkering licenses and ensures adherence to national energy policies.

2.2.4 NAMPORT

The Namibia Ports Authority, manages the country's major commercial ports.

2.3 National Legislation, Acts and Policies

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

2.3.1 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.

2.3.2 EIA Policy (1995).

This policy states that the principle of achieving and maintaining sustainable development must underpin all policies, programmes and projects undertaken within Namibia. In particular, the wise utilization of the country's natural resources, together with the responsible management of the biophysical environment, must be for the benefit of both present and future generations.

2.3.3 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.

2.3.4 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.

2.3.5 Policy for the Conservation of Biotic Diversity and Habitat Protection, 1994.

A comprehensive conservation policy that integrates sustainable practices and natural resource management.

2.3.6 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.

2.3.7 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.

2.3.8 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.

2.3.9 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.

2.3.10 Public and Environmental Health Act No. 1 of 2015.

To provide a framework for a structured uniform public and environmental health system in Namibia.

2.4 International Conventions

2.4.1 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.

2.4.2 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.

2.4.3 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.

2.4.4 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.

2.4.5 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.

2.4.6 International Convention on Biological Diversity

Among others, this Convention aims at conservation of biological diversity and promote sustainable development of biological components.

2.5 Applicable Listed activities

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

Table 6: Listed activities triggered by the proposed Project

LISTED ACTIVITY
9.4 The storage and handling of dangerous goods, including petrol, diesel, liquid petroleum, gas or paraffin in containers with a combined capacity of more than 30 cubic meters at any one location.

3 EMP ADMINISTRATION

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

4 ROLES AND RESPONSIBILITIES

The implementation of the EMP requires the involvement of several stakeholders, each fulfilling a different but vital role to ensure sound environmental management during each phase.

4.1 SHEQ Coordinator

The SHEQ Coordinator will delegate powers to the Operations Manager and Supervisors who will be required to execute the responsibilities, in compliance with relevant legislation and the EMP.

Any decision regarding environmental management is ultimately shared between the SHEQ Coordinator, and Operations Manager, having the following responsibilities in terms of the implementation of this EMP:

- Assisting in finding environmentally responsible solutions to problems with input from Supervisors and relevant personnel where necessary.
- Taking appropriate action where the mitigations/recommendations are not followed.
- Monitoring the undertaking of environmental awareness training for all new personnel coming onto the vessel.

4.2 Operations Manager/Supervisors

The Operations Manager and/or Supervisors will be competent persons (SHE Reps) appointed by GAC or its subsidiaries to implement the on-site environmental management of this EMP. The Operations Manager and/or Supervisor shall be on site daily and their duties will include the following:

- Maintaining open and direct lines of communication with the SHEQ Coordinator regarding environmental matters.

- Daily site inspections of all areas regarding compliance with the EMP.
- Daily monitoring and verifying adherence to the EMP monitoring and verifying that environmental impacts are kept to a minimum.
- Assisting the SHEQ Coordinator in finding environmentally responsible solutions to problems.

5 ENVIRONMENTAL MONITORING AND AUDITING

Auditing should be conducted bi-annually by an Independent Environmental Consultant.

Benefits derived from the audit process may include:

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

6 ENVIRONMENTAL AWARENESS

GAC shall ensure that the EMP is distributed to all relevant personnel. It is the responsibilities of the Operations Manager and Supervisors to ensure that the workers comply to the EMP measures during operations.

As a minimum, the Operations Manager and Supervisors, along with the SHEQ Coordinator should:

- Explain the importance of complying with the EMP.
- Discussion of the potential environmental impacts of operational activities.

- The benefits of improved personal performance.
- Employees' roles and responsibilities including emergency preparedness.
- Explanation of the mitigation measures that must be implemented when carrying out their activities.
- Explanation of the management structure of individuals responsible for matters pertaining to the EMP.
- The Operations Manager and Supervisors shall keep records of all environmental training sessions, including names, dates and the information presented.

6.1 Training and Awareness

The purpose of the job specific environmental awareness training is to ensure that employees are equipped to implement the actions committed to in the EMP. The staff involved in operations will receive training regarding the requirements of this EMP.

Four main forms of training will be provided on site:

- ◆ Site induction
- ◆ Environmental management training – general and targeted
- ◆ Environmental Toolbox Talks
- ◆ Poster awareness

The following will be done to ensure all employees, contractors, suppliers and visitors receive the appropriate training/awareness:

7 ENVIRONMENTAL ACTION PLANS

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

7.1 Action plans to achieve objectives and goals

Table 7: Action Plan – MANAGEMENT AND MONITORING

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

Management and Mitigation Measures	Action plan	
	Frequency / target date	Responsible parties
<ul style="list-style-type: none">GAC shall ensure that all aspects of the EMP are implemented during operational activities.The environmental consultant shall conduct bi-annual site inspection and make provision for reporting on every aspect of the EMP.	Throughout (On- going)	SHEQ Manager

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Table 8: Action Plan – Communication and Stakeholder Consultation

Objective:

To ensure that all stakeholders are adequately informed throughout operations and that there is effective communication.

Management and Mitigation Measures	Action plan	
	Frequency / target date	Responsible parties
<ul style="list-style-type: none">GAC shall take responsibility for the implementation for all provisions of this EMP and to liaise with the authorities (NAMPORT, Ministry of Agriculture, Fisheries, Water and Land Reform, Ministry of Industries, Mines and Energy, Ministry of Environment, Forestry and Tourism).	Throughout (On- going)	SHEQ Manager

Table 10: Action Plan – Health and Safety

Objective: To ensure health and safety of workers at all times during operations

Management and Mitigation Measures	Action plan	
	Frequency / target date	Responsible parties
<ul style="list-style-type: none">Prepare a strategy to ensure the prevention of potential safety hazards during operations.Safety warning signs must be placed on the vessel.	Throughout (On- going)	SHEQ Manager SHEQ Coordinator

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Management and Mitigation Measures	Action plan
<ul style="list-style-type: none">• Adhere to the regulations pertaining to Healthy and Safety, including the provision of personal protective clothing.• Protection masks shall be provided where required.• Use protective hearing equipment for workers conducting noisy activities.• Maintain high standard in housekeeping on the vessel.• Provide necessary fire prevention equipment on site in line with applicable regulations.• Implement incident report access to incidents occurring at the facility as soon as possible and not later than 24 hours after the incident occurred (including short-and long-term response measures). A major incident is a e.g., fatality, injury, major oil spill, social unrest, outbreak of violence, labour strikes etc.• Risk assessment to be conducted prior to bunkering activities.• Training provided for workers undertaking the bunkering activities.• Rationalizing fuel storage to ensure: accepting adequate quantities, adequate storage tanks and space available and all required signage and PPE are available.• Fuel handling and storage requirements training for workers• Firewatch staff will be identified and trained.• Induction and emergency training to be conducted.• Emergency procedures should be in place.• Spill kits should be available.	Supervisors and SHE Reps.

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Management and Mitigation Measures	Action plan	
<ul style="list-style-type: none">First aid kits and trained first aiders/safety representatives		

Table 11: Action Plan – Fuel Handling and Storage

Objective:

To minimise exposure and spillages as a result of handling and storage

The risk of fires or explosions during handling and storage of the fuel is very high. The flammable fuel will only ignite if the containers have been damaged and there are sparks or heat created (mechanical or electrical) in the vicinity of the fuel.

Management and Mitigation Measures	Action plan	
	Frequency / target date	Responsible parties
<ul style="list-style-type: none">Regular housekeeping and safety inspections/audits to be conducted by management personnel to ensure continuous compliance with safe operating procedures and safety standards.Full inspections will be carried out by Safety Reps as part of a monthly program. Daily	Throughout (On- going)	SHEQ Coordinator, Supervisors and SHE Reps.

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Management and Mitigation Measures	Action plan	
<p>walk-rounds must be carried out to identify any potential issues.</p> <ul style="list-style-type: none">• The fuel shall only be stored in original tanks being undamaged and sealed.• Damaged tanks must be immediately repaired/fixed to avoid contamination on vessel• A Standard Operating Procedure (SOP) must be developed for fuel handling and storage.• Bunkering activities shall be carried out with appropriate bunding.• Provide annually rigorous re-fresher safety training to employees to ensure that they remain familiar with the dangers associated with the fuel handling and storage.• No foodstuffs will be permitted near where fuel is handled and stored.		

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Table 12: Action Plan – Waste and Oil Spill Management

Objective:

- To avoid contribution to water pollution and marine ecosystem displacement.
- To ensure that sound waste management practices are adhered to during operations.

Management and Mitigation Measures	Action plan	
	Frequency / target date	Responsible parties
<ul style="list-style-type: none">• Implement the Oil Spill Contingency Plan.• Ensure suitable receptacles with lids for waste disposal is available on the vessel at all times.• Recycling will be promoted on site.• If rubbish containers are used, ensure these can be sealed from strong wind.• Soil contaminated with hydrocarbons shall be excavated and transported for disposal at the nearest disposal facility (Walvis Bay Hazardous Disposal Facility).• Adequate separate containers for hazardous and general waste must be provided on site.• The workforce must be sensitized to dispose of waste in a responsible manner and not to litter.	Throughout (On- going)	SHEQ Coordinator, Supervisors and SHE Reps.

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Management and Mitigation Measures	Action plan	
<ul style="list-style-type: none"> Oil spill booms must be installed before transfers. Hazardous waste (including hydrocarbons) will be disposed of at a licensed hazardous waste disposal facility in Walvisbay. Hydrocarbon and chemical contaminated materials (soils, rags, containers, filters etc.) are considered hazardous waste and will be handled and disposed of accordingly. 		

Table 13: Action Plan – Traffic Management

Objective:

The objective of the management measure is to appropriately manage traffic impacts

Management and Mitigation Measures	Action plan	
	Frequency / target date	Responsible parties

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Management and Mitigation Measures	Action plan	
<ul style="list-style-type: none">• Appoint only suitably qualified and experienced personnel versed in the details of, among others, the Convention on the International Regulations for Preventing Collisions at Sea (COLREGs).• Ensure all safety and communications equipment on the vessel, regularly inspected and maintained to be in a working order at all times. And that relevant crew are trained in the use of the equipment, including emergency equipment and procedures when normal systems fail.	Throughout (On- going)	SHEQ Coordinator, Supervisors and SHE Reps.

Table 16: Action Plan – Socio-Economic

Objective:

To enhance positive social and economic benefits.

Management and Mitigation Measures	Action plan	
	Frequency / target date	Responsible parties
<ul style="list-style-type: none"> Plan for residents in Luderitz and Walvis Bay to form a significant part of the project hiring policy to give preference to Project Affected People (PAP) through recruitment and training. Local people be preferentially selected to encourage social growth and development in the Erongo and //Karas Regions and Namibia as a country. Begin local selection and provide technical training as soon as possible to enable local people to compete for the lower skilled jobs and upskill themselves. Recruit a balanced gender and age workforce – not only youth (under 35 years) but also people with experience of different ages, to minimise workplace social problems. Foster good labour relations and take responsibility to respect employees' human rights. 	Throughout (On- going)	SHEQ Coordinator, Supervisors and SHE Reps.

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