

# UPDATED ENVIRONMENTAL MANAGEMENT AND CONTINGENCY PLAN

DATE: **16 FEBRUARY 2026**  
APP-250911006393

## ***OPERATION OF A CRUSHING AND PACKAGING OF DECANNED CERAMIC AUTO CATALYST SCRAP AND E- WASTE PROCESSING FACILITY, AT JAN MARAIS STREET NORTHERN INDUSTRIAL WINDHOEK***



Prepared for:

Proponent: Ecolux Trading cc  
Jan Marais Street, Windhoek  
P. O. Box 91072 Klein Windhoek  
Mobile: +264 81 761 6490

Prepared by:

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## Declaration of authorship

APPLICATION NUMBER:

APP – 250911006393

Project Title:

Application for Renewal of Environmental Clearance Certificate for the Operation of a  
crushing and packaging of de-canned ceramic auto catalyst scrap and e-waste processing  
facility, at Jan Marais street northern industrial| |Khomas Region

Mr. Lourens Mbaoroka (full name of Environmental Assessment

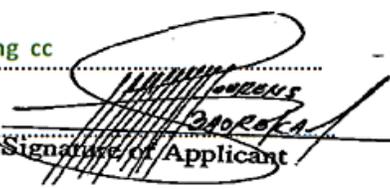
Practitioner - EAP) understand and agree that the information I have furnished in this submission will be reviewed by the Office of the Environmental Commissioner (OEC). I accept that the Environmental Commissioner, will hold me accountable in terms of Section 43(1)(b) of the Environmental Management Act, Act No. 7 of 2007 for any inaccurate or misleading information knowingly provided in the following documentation.

Tick the box (es) applicable to your submission:

- Pro Forma Environmental Contract for Mining Claim(s)
- Environmental Questionnaire for Mining
- Scoping report
- Environmental Impact Assessment (EIA)
- Environmental Management Plan (EMP)
- Consent from Relevant Authority

I certify, and, acknowledge that the provision of such information will impede the lawful carrying out of the duties, responsibilities and functions of the Environmental Commissioner. I declare that the information submitted is my own work. All direct or indirect sources used are acknowledged as references.

Consultancy Name: Ecolux Trading cc

EAP Signature:   
Signature of Applicant

Date: 2022-05-09

**NB- To be submitted jointly with Scoping Report, EIA, and EMP documents to the Office of the Environmental Commissioner**



**REPUBLIC OF NAMIBIA  
MINISTRY OF ENVIRONMENT, FORESTRY AND TOURISM**

OFFICE OF THE ENVIRONMENTAL COMMISSIONER

**ENVIRONMENTAL CLEARANCE CERTIFICATE**

**ISSUED**

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

**TO**

**Ecolux Trading (PTY) LTD  
P. O. Box 91072, Windhoek**

**TO UNDERTAKE THE FOLLOWING LISTED ACTIVITY**

**CRUSHING AND PACKAGING OF DECANNED CERAMIC AUTO  
CATALYST SCRAP IN WINDHOEK, KHOMAS REGION.**

Issued on the date: **2022-05-09**

Expires on this date: **2025-05-09**

*(See conditions printed over leaf)*



**Reuse  
Recycle**



## **1. PURPOSE OF THIS DOCUMENT**

- To provide an overview of the proposed project, involving the crushing of non-hazardous, scrap de-canned ceramic auto catalyst purchased from scrap yards locally in Namibia.
- To highlight the process that will be followed herein, as well possible environmental and socio-economic impacts of the proposed project.
- To provide possible mitigation measures for adverse environmental impacts

## **2. BACKGROUND**

Ecolux Trading (Pty) LTD is a Namibian registered company involved in the recycling of scrap automotive catalyst converters from wrecked vehicles. A catalytic converter is an exhaust emission control device, which converts toxic gases and pollutants in exhaust gas from an internal combustion engine, to less toxic pollutants by catalyzing a redox reaction. Catalytic converters are usually used with internal combustion engines fueled by either petrol or diesel.

## **3. NEED AND DESIRABILITY OF PROJECT**

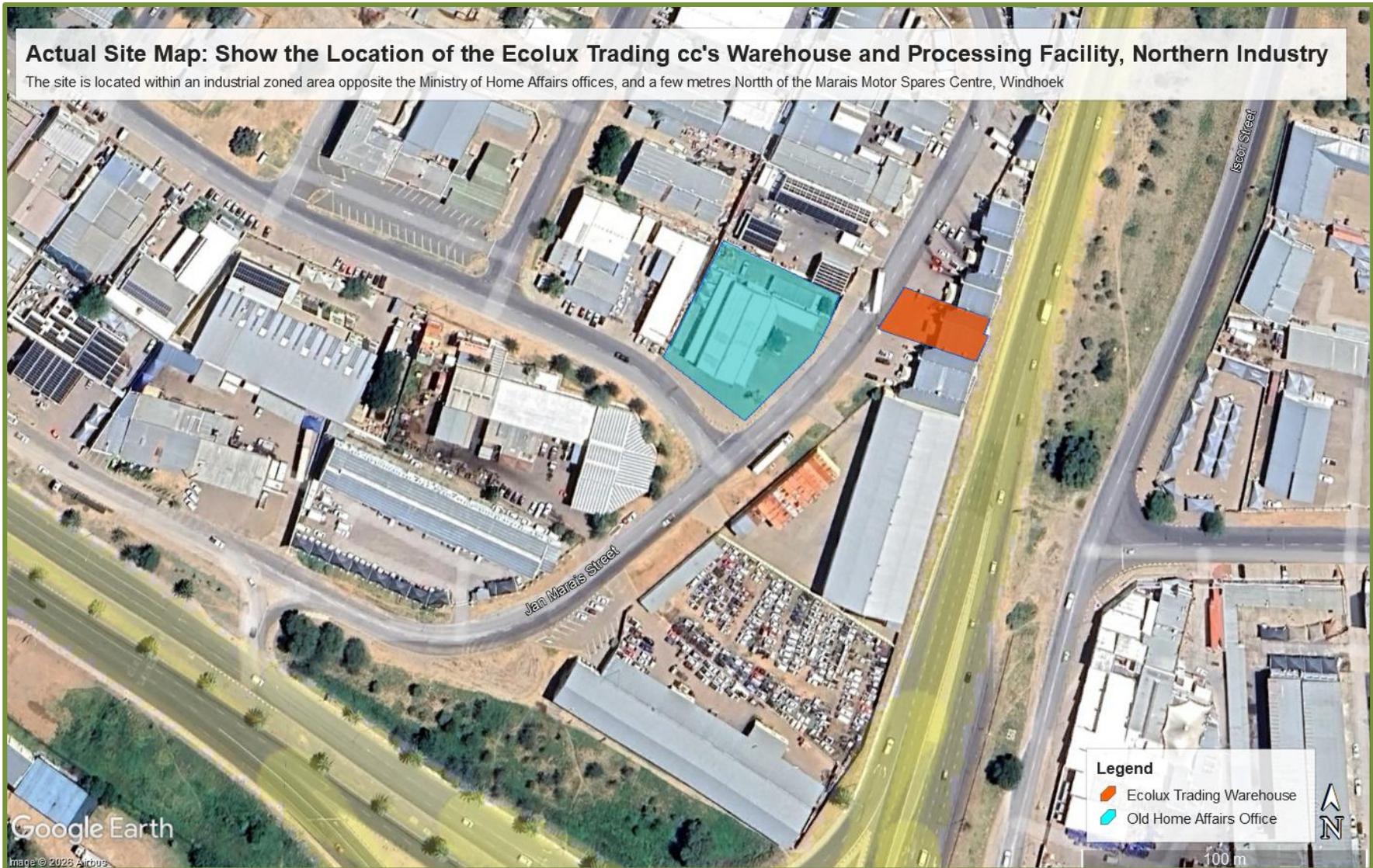
Catalytic converter recycling is a process that benefits the environment greatly. However, the positive impact it has on the planet is often overlooked, in the industry as the primary objective of the seller is to earn an income. This project would greatly reduce the amount of scarp ceramic catalytic convertors disposed at landfill sites and will also prevent mining metal ore and fabricating the metals as this is a labour and energy intensive process, requiring extensive mining, costly processes and harmful chemical treatments. This project is also desirable as it lowers the need to mine for new raw materials and keeps valuable resources in a closed-loop economy. Furthermore, this project is desirable as it prevents the mining process, which not only pollutes the environment but is also harmful to the mineworkers, who are often underpaid and forced to work in harsh conditions.

## **4. PROJECT DESCRIPTION**

The proposed project will be undertaken in a warehouse under a lease agreement, situated in the northern industrial area opposite the Ministry of Home Affairs offices (**Figure 1**). It is expected that as the proposed site falls within the industrial area where many industries are in operation rezoning will not be required. The warehouse is equipped with an open area where the crusher will be stationed and packaging will be done (**Figure 2**). There are also ablution facilities (male and female) and the three (3) employees are also provided with a kitchenette away from where the crushing will be conducted (**Figure 3**).

### Actual Site Map: Show the Location of the Ecolux Trading cc's Warehouse and Processing Facility, Northern Industry

The site is located within an industrial zoned area opposite the Ministry of Home Affairs offices, and a few metres North of the Marais Motor Spares Centre, Windhoek



**Figure 1:** Shows the current location of the Ecolux Trading cc's Operations in Northern Industrial Windhoek



**Figure 2:** Illustration of company staff safely handling the de-canned ceramic auto catalyst



**Figure 3:** Illustration of the provided ablution facilities (toilet and shower) for male and female staff

The scrap ceramic catalytic converters will be purchased locally from scrap yards in Namibia, where they are removed from wrecked cars or car repair garages where they are removed/placed when repairing vehicles. This project therefore aims to re-use these waste ceramic catalytic converters by crushing them into powder form by use of an electric powered crusher or mill with spinning blades and a motor. The crushed product will be packaged in dust proof bags for exportation. In essence, this project aims to recycle the spent/scrap ceramic catalytic converters which would otherwise end up at a landfill in the event that it is not sold, which is highly likely in the Namibian context.

It is important to note that Ecolux Trading will not be involved in the transportation as they will enlist the services of independent freight services such as Kuehne & Nagel Windhoek, Transworld and Worker Freight to transport the packaged crushed product for exportation. These service providers are well experienced in the transportation industry and are insured in the event of any unforeseen eventuality.

## **5. RECEIVING ENVIRONMENT**

### **Climate**

Windhoek and surroundings in general are characterized with a semi-arid highland savannah climate typified as very hot in summer and moderate dry in winter. The highest temperatures are measured in December with an average daily temperature of maximum 31°C and a minimum of 18°C. The annual average rainfall for the area is 350 mm to 400 mm. Over 70% of the rainfall occurs in the summer months' period between November and March. Rainfall in the area is typically sporadic and unpredictable however the average highest rainfall months are January to March.

The predominant wind in the region is easterly, with westerly winds from September to December. Extreme winds are experienced in the months of August and September when significant wind erosion in disturbed areas is visible (Robertson, Jarvis, Mendelsohn, & Swart, 2012).

### **Topography, Geology, Hydrogeology and Soils**

The general topography of the land, with the City of Windhoek falling within a valley, forms a natural catchment basin where all the water is collected and from which it is transported to the north (City of Windhoek, 2006). The landscape in the Khomas Region is classified as being in the Khomas Hochland, high Plateau, which is characterized by rolling hills and many valleys.

The soil cover in the study area is the lithic leptosols referring to shallow soil cover over hard rocks. The main rock type is identified as biotite schist, but with minor strata of micaceous quartzite, feldspathic schist and amphibole schist (Labuschagne, 2004; Mendelsohn *et al*, 2002).

### **Flora and Fauna**

Flora associated with the general area is commonly referred to as the Thornbush Savanna – Tree and Shrub Savanna – (Giess 1971) or Thornbush Shrubland (Mendelsohn *et al*. 2002). The subject area falls within the Tree and Shrub Savanna biome. It is characterised by Highland Shrubland where the vegetation structure is dense shrubland. The area has medium terrestrial diversity in terms of animal and plant life. Plant diversity is recorded to be between 300-399 species.

The area has high plant endemism with of between 26 and 35 endemic species believed to be found within the area. In terms of animals, the bird diversity of the region is recorded to be between 171-200 species, mammal diversity between 61 -75 species and reptile diversity between 61- 70 species. However, there is limited wildlife in the Windhoek area due to urbanization.

## 6. POTENTIAL IMPACTS

POSITIVE IMPACTS	NEGATIVE IMPACTS AND PROPOSED MITIGATION
<ul style="list-style-type: none"> <li>• Preservation of finite resources as recycled components lowers burden of extracting new materials from the earth through exhaustive mining processes.</li> </ul>	<ul style="list-style-type: none"> <li>• Possible creation of dust fumes. The Crusher to be used in operations is designed with hoovers to collect any fugitive dust fumes as an engineering control as mitigation measure, to ensure that possible dust fumes are absorbed.</li> <li>• The employees will also be provided with the necessary personnel protective equipment including overalls, eye protection gear as well as face masks and respirators in an effort to curb inhalation of possible fugitive dust fumes.</li> </ul>
<ul style="list-style-type: none"> <li>• Reduction in waste sent to landfills</li> </ul>	
<ul style="list-style-type: none"> <li>• Job creation for locals who will be employed on the proposed project</li> </ul>	
<ul style="list-style-type: none"> <li>• Help boost local/regional/international economic growth</li> </ul>	
<ul style="list-style-type: none"> <li>• Open up other investment opportunities</li> </ul>	

## 7 MITIGATION MEASURES

### OVERALL OBJECTIVES OF THE EMP

The following overall environmental objectives have been set for the operation / development project:

- To comply with national legislation and standards for the protection of the environment.
- To limit potential impacts on biodiversity through the minimization of the footprint (as far as practically possible) and the conservation of residual habitat within the mine area.
- To keep surrounding communities informed of farming activities through the implementation of forums for communication and constructive dialogue.
- To develop, implement and manage monitoring systems to ensure good environmental performance in respect of the following: ground and surface water, air quality, noise and vibration, biodiversity and rehabilitation.

### KEEPING EMPS UP TO DATE

This Environmental Management Plan (EMP) document is designed to meet legal requirements and avoid or minimize the impacts associated with the implementation of Ecolux Trading's operation and mining development. It is the intention that this EMP should be seen as a "living document" which will be amended during the operation, as the activities might change or new ones be introduced.

**OPERATIONAL PHASE IMPACTS**

Impact	Mitigation Measures
<b>Surface and Ground Water Impacts</b>	<ul style="list-style-type: none"> <li>• No dumping of waste products of any kind on or around the site.</li> <li>• Collection and disposal of solid waste from the sites should be properly managed and general waste taken to the designated landfill site.</li> </ul>
<b>Health, Safety and Security</b>	<ul style="list-style-type: none"> <li>• Restrict unauthorized access to the site and implement <b>access</b> control measures.</li> </ul>
<b>Noise</b>	<ul style="list-style-type: none"> <li>• Inform immediate neighbours of alteration activities prior to commencing and provide for continuous communication between neighbours and contractor.</li> <li>• Do not allow the use of horns as a general communication tool but use it only where necessary as a safety measure. Do not allow commercial activities that generate excessive noise levels.</li> <li>• Continuous monitoring of noise levels should be conducted to make sure the noise levels do not exceed acceptable limits.</li> </ul>
<b>Dust and Gaseous Emissions</b>	<ul style="list-style-type: none"> <li>• It is recommended that dust suppressants such as Dustex be applied to all outside the warehouse activities at least a 50% control efficiency to reduce water usage.</li> <li>• Delivery / haulage vehicles are to use only designated roads.</li> <li>• Provide workers with dust masks where necessary.</li> </ul>
<b>Waste</b>	<ul style="list-style-type: none"> <li>• It is recommended that contaminated waste from the toilets be disposed of at an approved sewage treatment plant</li> <li>• Waste bins should be placed around the site for general refuse.</li> <li>• Solid waste will be collected and disposed of at an appropriate local landfill or an alternative approved site, in consultation with the local authority.</li> </ul>
<b>Hazardous Substances</b>	<ul style="list-style-type: none"> <li>• Storage of hazardous substances in a covered, bunded area, with a volume of 120 % of the largest single storage container or 25 % of the total storage volume, whichever is greater.</li> <li>• Refuel vehicles in designated areas that have a protective surface covering and utilize drip trays for oil changes, repairs to and maintenance of vehicles and plant.</li> </ul>
<b>Social Impacts</b>	<ul style="list-style-type: none"> <li>• No specific mitigation measures are required, only that the local community specifically residents of townships within Windhoek be informed of job creation opportunities and given first priority if unskilled and semi-skilled job vacancies become available.</li> </ul>

**CURRICULUM VITAE**  
**OF**  
**MR LOURENS MBAOROKA**

**Cell: 0817616490**

**Email: [mbaorokal@gmail.com](mailto:mbaorokal@gmail.com)**

### **Personal details**

Surname Mbaoroka  
First Name Lourens  
Date of Birth 22 March 1997  
Health Excellent  
Gender Male  
Marital Status Single  
Criminal Record None  
Nationality Namibian  
Contact number 0817616490  
Residential address Erf 1991, Hardap street, Goreangab

### **Educational Background**

Highest grade passed Grade 10  
School Cosmos High school  
Subjects English, Afrikaans, Mathematics, History, Accounting, Geography, Entrepreneurship

### **Language Proficiency**

<b>Language</b>	<b>Speak</b>	<b>Write</b>	<b>Read</b>
English	Good	Good	Good
Afrikaans	Good	Good	Good
Otjiherero	Good	Good	Good
Damara Nama	Good	Poor	Poor

### **General Background and Motivation**

I am a very hardworking individual and can cope under a lot of pressure. I will do whatever is required of me while performing at the best of my abilities. Furthermore, I am always willing to learn new things and I work well in either a team or as an individual.

### **Personal Profile**

Self-motivated and believe in principles of work ethics. Adapt fast to any given task or workloads. Ability to work in a small dynamic group with different background. Good interpersonal communication skills, leadership skills and confident team player.

### **Hobbies**

Listening to music  
Sports

## **References**

Mr Gustav Uaeta  
Chief Director: Namibia Local Hospitality Academy  
Cell: 0817236589

Mr R. Beukus  
Manager: Medi Clinic  
Tel: 061-433 1000

Mr M. Hugo  
Human resources: Seattle Coffee Company Namibia  
Tel: 061-377 181

Annexure 1B: Proof of Payment (Application)

No. 4878

Government Gazette 6 February 2012

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ANNEXURE 1  
FORMS

Form 1

REPUBLIC OF NAMIBIA

ENVIRONMENTAL MANAGEMENT ACT, 2007

(Section 32)

*Renewal*

APPLICATION FOR ENVIRONMENTAL CLEARANCE CERTIFICATE

MINISTRY OF FORESTRY AND TOURISM	NAMIBIA REVENUE
DIRECTORATE OF ENVIRONMENTAL AFFAIRS	N\$100
16 FEB 2012	NAMIBIA REVENUE
RECEIVED 3	NAMIBIA REVENUE
Signature:.....	N\$100

PART A: DETAILS OF APPLICANT

1. Name: (person or business) *EcoLux TRADING CC*
2. Business Registration / Identity No. *2025/03089*  
(if applicable)
3. Correspondence Address: *Info@ecoluxtrading.com*
4. Name of Contact Person: *LOURENS MBAOROKA*
5. Position of Contact Person: *GENERAL MANAGER*
6. Telephone No.: *-*
7. Fax No.: *-*
8. E-mail Address : (if any) *mbaoroka1@icloud.com*

Tick ( ) the appropriate box

**PART B: SCOPE OF THE ENVIRONMENTAL CLEARANCE CERTIFICATE****1. The environmental clearance certificate is for:**

CATALYST SCRAP

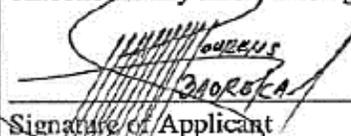
**2. Details of the activity(s) covered by the environmental clearance certificate:**

[Note: Please attach plans to show the location and scope of the designated activity(s), and use additional sheets if necessary:

Title of Activity: Crushing and Packaging of Decanned Ceramic Auto  
 Nature of Activity: CATALYST SCRAP  
 Location of Activity: Northern Industry JAN MORAIS Unit 2  
 Scale and Scope of Activity:

**PART C: DECLARATION BY APPLICANT**

I hereby certify that the particulars given above are correct and true to the best of my knowledge and belief. I understand the environmental clearance certificate may be suspended, amended or cancelled if any information given above is false, misleading, wrong or incomplete.

 LOURENIS MBAOROKA GENERAL MANAGER  
 Signature of Applicant Full Name in Block Letters Position

on behalf of ECOLUX TRADING 15/05/25  
 Date



**REPUBLIC OF NAMIBIA**  
Ministry of Environment, Forestry & Tourism

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2025-09-16

Dear Lourens Mbaoroka,

This email serves to inform you that your application APP-006393 has been verified

Taking the following into considerations:

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

Please upload the following documents:

- Updated EMP to effect amendment
- 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
- Copy of the previous Environmental Clearance Certificate issued in terms of Section 37(1)(a) of EMA
- CV of Environmental Assessment Practitioner (EAP)
- Declaration for the Submission of Assessment Reports and other Support Documents (upload Declaration Form from [www.eia.mef.gov.na](http://www.eia.mef.gov.na) (downloads)

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 relevant documents i.e (application forms, EIA, Scoping reports, EMP etc) to the office of the Environmental Commissioner

Annexure 1D: Proof of Screening