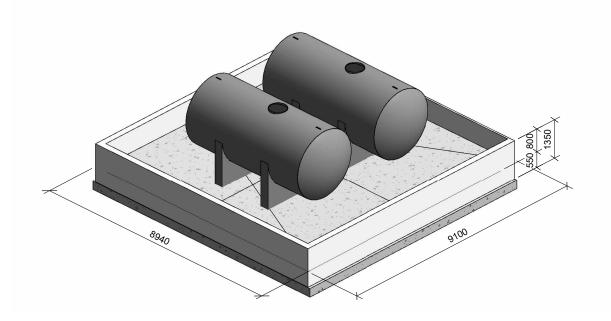




Application No: 251020006558

Environmental Management Plan for the Installation of two above ground fuel tank with a total capacity of 46 cubic meters at Kalkveld Settlement, Otjozondjupa Region



Environmental Assessment Practitioner Proponent

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ACRONYMS

DEA Department of Environmental Affairs

EA Environmental Assessment

EAP Environmental Assessment Practitioner

ECC Environmental Clearance Certificate

ECO Environmental Compliance Officer

EIA Environmental Impact Assessment

EMA Environmental Management Act (No. 7 of 2007)

EMP Environmental Management Plan

MET Ministry of Environment and Tourism

PPE Personal Protective Equipment

RDC Red-Dune Consulting CC

SM Site Manager

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Executive summary

This Environmental Management Plan (EMP) covers the proposed installation and operation of two 23 m³ above-ground diesel fuel tanks at China Jiangxi International Economic and Technical Cooperation Namibia Co. Ltd.'s Kalkveld construction campsite (Otjozondjupa Region). On-site fuel storage is required to support heavy railway construction equipment and to improve operational efficiency. The land has been allocated by the Otjozondjupa Regional Council (Annex 1).

Key controls include steel horizontal tanks with venting, overfill protection, emergency shut-offs and grounding; reinforced concrete bunds sized to hold at least 110% of tank volume; leak detection and high-level alarms; secured fencing and access control; designated refuelling pads; and fire-fighting equipment. Operational measures require staff training, PPE, authorised fuel suppliers, supervised transfers, routine inspections, spill kits, and clear emergency procedures.

Main risks addressed are VOC exposure (BTEX), fire/explosion, spills and soil/water contamination, stormwater impacts, vandalism, and waste generation. Monitoring includes daily logs, regular inspections, maintenance records, training/drill documentation and incident reporting, with the Site Manager responsible for implementation and escalation to regulators as needed.

With full implementation of the EMP measures and regulatory conditions, the proposed fuel storage operations at Kalkveld are expected to pose minimal environmental and social risk. Approval is recommended subject to compliance with the EMP and conditions from relevant authorities.

Chapter 1. Introduction and Background

1.1. Proponent

China Jiangxi International Economic and Technical Cooperation Namibia Co. Ltd. is a prominent enterprise specializing in infrastructure development, engineering, and technical cooperation. The company has been actively involved in promoting various economic and technical projects in Namibia, with a particular focus on enhancing transportation infrastructure. Currently, they are engaged in an ongoing upgrade of Namibia's railway network. This project aims to address the aging railway infrastructure in the country, thereby improving connectivity, boosting trade, and facilitating regional integration.

The company operates two main construction campsites, one located in Kalkveld Settlement in the Otjozondjupa region and the other in Rosh Pinah in Khara Region. Due to the use of heavy construction equipment, the company is installing two 23-cubic-meter above-ground diesel fuel tanks at its construction campsites.

1.2. Regulatory requirements

The Environmental Management Act (Act No. 7 of 2007) specifies that handling and storage of fuel volumes of 30 cubic meters or more are activities that cannot be undertaken without an Environmental Clearance Certificate (ECC). These activities include:

- 9.1 The manufacturing, storage, handling or processing of a hazardous substance defined in the Hazardous Substances Ordinance, 1974.
- 9.4 The storage and handling of a dangerous goods, including petrol, diesel, liquid petroleum gas or paraffin, in containers with a combined capacity of more than 30 cubic meters at any one location.

Consequently, the company has appointed Red-Dune Consulting, an independent environmental consulting firm, to develop an Environmental Management Plan for the operation of the above fuel tanks. Please note that this EMP has been developed specifically for the Kalkveld Construction Camp Site.

1.3. The need for onsite fuel tank

Railway construction operations involving heavy vehicles and equipment that require large volumes of diesel daily. As a result, fuelling from traditional service stations is neither convenient nor economical. To address this, such operations are typically supported by onsite above-ground fuel tanks, which are considered safe and easily monitored.

1.4. Consent from relevant authority

The land on which the site is situated has been allocated to the company by the Otjozondjupa Regional council (see Annex 1).

Chapter 2. Project Description

2.1. Location

The construction campsite is located on the outskirt of Kalkveld Settlement, near the railway GPS -20.892544°S, 16.190196°E) (Figure 1).



Figure 1. Location Kalkveld Construction Camp Site

2.2. Desing of fuel tank platform

The design for the above-ground fuel tank is made with an integrated containment system to manage accidental / over fuelling spills. The tanks are made of steel for durability and corrosion resistance with the venting system to prevent pressure buildup and accommodate temperature variations as we all safety features that enables emergency shut-off valves and grounding to prevent static buildup. The containment structure is constructed with concrete to ensure no infiltration could occur. The containment capacity is designed to hold at least 110% of the tank's maximum capacity to contain potential spills or leaks (Figure 2).

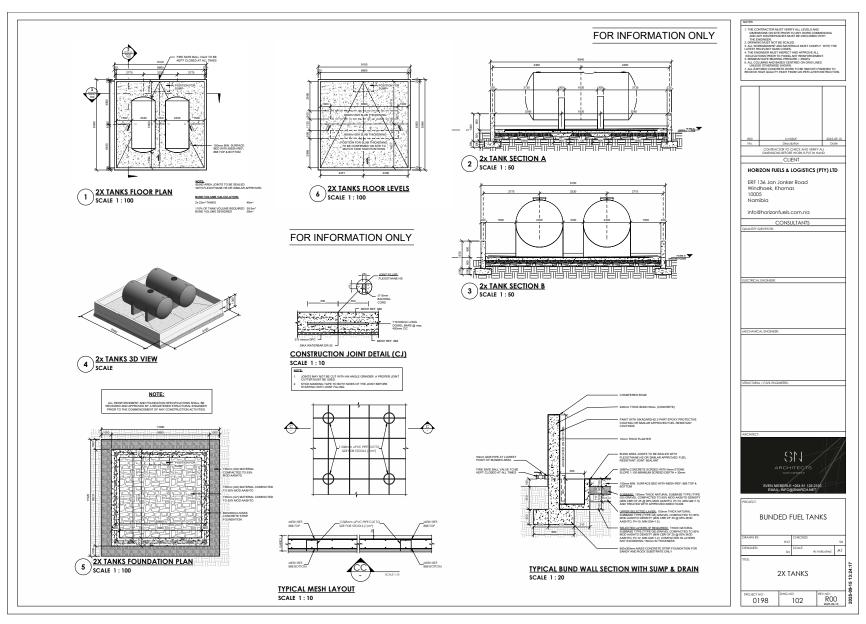


Figure 2. Tank design

2.3. Supporting infrastructure

Water: The site is connected to the NamWater settlement water pipeline. Electricity: The site is connected to the electricity grid, supplied by NamPower. Ablution Facility: The site currently uses mobile toilets (see Figure 3).





Water Tap on site

Mobile Toilet on site



Three Phase Electrical Lines to site

Figure 3. Supporting infrastructure on site

Chapter 3. Description of the Environment

3.1. On site Environment

The construction campsite has been cleared. Evidence of the surrounding area indicated that, the area is encroached by patchy shrubs of Black Thorn (*Acacia mellifera*), trees of Camel Thorn (*Acacia erioloba*) and Shepherd's Tree (*Boscia albitrunca*).





Outside next to site

Figure 4. Site pictures

3.2. General Kalkveld Environment

Component	Aspects	Description
Biophysical	Location &	Kalkveld is a settlement in the Otjozondjupa Region
Environment	geology	of central Namibia, situated about halfway between
		Omaruru and Otjiwarongo.
		• The area lies at an elevation of around 1,500 m above
		sea level

Component	Aspects	Description
		Underlying geology includes a "complex" near
		Kalkveld of carbonatite, syenite and related rock
		types
	Climate	The climate is classified as semi-arid
		Annual rainfall in the Otjozondjupa Region varies
		widely, from about 300 mm up to ~600 mm
		depending on location.
		• Average annual temperature is about 20–21 °C in the
		region high sunshine hours (about 9–10 hours per
		day) with strong solar radiation.
	Vegetation &	The region falls within the "Tree-and-Shrub
	soils	Savanna" biome (specifically Acacia tree & shrub
		savanna)
		The Kalkveld area and wider Otjozondjupa region,
		vegetation is described as "thorn bush
		savannah/shrubland" dominated by species such as
		Black Thorn (Acacia mellifera), Camel Thorn
		(Acacia erioloba) and Shepherd's Tree (Boscia
		albitrunca).
		Soils in much of the region include reddish Arenosols
		in many parts, with pockets of calcrete or other
		deposits.
Social	Demographics	Kalkveld is designated as a settlement in the
Environment	& settlement	Otjozondjupa Region, within the Omatako
	status	Constituency.
		• Its estimated population is about 5,000 inhabitants.
		The settlement status has been pointed to as a
		hindrance for investment and development (e.g.,
		inability to purchase property, lack of business
		growth).
	Economy &	Unemployment is very high in Kalkveld – estimated
	livelihoods	to be over 90 % unemployment among youth

Component	Aspects	Description
		Few businesses: locals report a small shop, a fuel
		station at the entrance, and minimal other commercial
		infrastructure.
		Main livelihood activities in the broader region
		include livestock farming (cattle, goats) and some
		cropping where conditions allow. The challenge is
		that semi-arid climate, degraded rangelands and bush
		encroachment that limit productivity.
	Infrastructure	Infrastructure is limited: Kalkveld lacks many basic
	& services	amenities such as sanitation, roads are un-tarred in
		many parts, and minima investment.
		The regional council has prioritised Kalkveld for
		upgrade in infrastructure as part of socio-economic
		upliftment plans.
	Culture &	Situated in former Damaraland territory; local
	heritage	languages include Khoekhoegowab or Otjiherero
		among inhabitants.
		The presence of rock engravings near Kalkveld, on
		nearby farms indicate long-standing human
		occupation and cultural heritage.

3.3. Summary of the receiving environment

- Kalkveld lies in a semi-arid savanna zone with thornbush vegetation and sandy soils
- Experience low and high variable rainfall
- Major environmental challenges include bush encroachment and water scarcity.
- Socially, Kalkveld has high unemployment, under-development and limited infrastructure.

Chapter 4. Policy and legal framework

The implementation of this Environmental Management Plan (EMP) is guided by the national legal and regulatory framework governing environmental protection and sustainable development in Namibia. Compliance with these laws is essential to ensure that the project is conducted in an environmentally responsible manner and in alignment with both national priorities and international best practices. A list of KEY legislation and policies is provided in Table 1 below.

Table 1. Policy and Legal framework governing the project

Legislation	Summary	Applicability
The Namibian	The Namibian constitution is the supreme law of the country which is	Contact an EIA to maintain the ecological
Constitution	committed to sustainable development. Article 95(1) of the Constitution of	process and diversity of the project area
	Namibia states that:- "The State shall actively promote and maintain the	
	welfare of the people by adopting policies aimed at The maintenance of	
	ecosystems, essential ecological processes and biological diversity of Namibia	
	and utilization of living natural resources on a sustainable basis for the benefit	
	of all Namibians, both present and future".	
The	The Environmental Management Act No 7 of 2007 aims to promote the	Statutory requirement of the EIA and
Environmental	sustainable management of the environment and the use of natural resources	guidelines
Management Act	and to provides for a process of assessment and control of activities which	
	may have significant effects on the environment; and to provide for incidental	

Legislation	Summary	Applicability
	matters. The acts provides a list of activities that may not be undertake without	
	an environmental clearance certificate.	
	Further, the Act ensures that;	
	(a) Potential threats are considers timeously	
	(b) A comprehensive stakeholder's consultations is conducted and all	
	Interested and affected parties are given an opportunity to comment on	
	the project	
	(c) Decision are robust by considering the above mentioned activities	
Draft Pollution	This Bill serves to regulate and prevent the discharge of pollutants to air and	Prevention of oil spills and leakages to
Control and	water as well as providing for general waste management. The Bill will repeal	prevent pollution
Waste	the Atmospheric Pollution Prevention Ordinance (11 of 1976) when it comes	
Management Bill	into force. The Bill also provides for noise, dust or odour control that may be	
	considered a nuisance. Further, the Bill advocates for duty of care with respect	
	to waste management affecting humans and the environment and calls for a	
	waste management licence for any activity relating to waste or hazardous	
	waste management.	
Atmospheric	This Ordinance serves to control air pollution from point sources, but it does	Although it is not anticipated for the fuel
Pollution	not consider ambient air quality. This ordinance is being repealed by the	station to generate excessive noxious or
Prevention	proposed Pollution Control and Waste Management Bill. Any person carrying	offensive gasses, the proponent will ensure
	out a 'scheduled process' which are processes resulting in noxious or offensive	that best industry practises are followed.

Legislation	Summary	Applicability
Ordinance Act	gases typically pertaining to point source emissions must obtain a registration	
No.11 of 1976)	certificate from the Department of Health.	
The Occupational	Safety:	Handling of fuel is susceptible to fire and
Safety and Health	A safety risk is a statistical concept representing the potential of an accident	explosion risk
Act No. 11 of	occurring, owing to unsafe operation and/or environment. In the working	
2007;	context "SAFETY" is regarded as "free from danger" to the health injury and	
	to properties.	
	Health:	
	Occupational Health is aimed at the promotion and maintenance of the highest	To maintain good and healthy standards, at
	degree of physical, mental and social wellbeing of workers in all occupations.	the work place, cleanliness, adequate
	This is done by ensuring that all work-related hazards are prevented and where	sanitary facilities, prevention of inhaling
	they occur, managed.	toxic emissions.
Public Health Act	The Act serves to protect the public from nuisance and states that no person	The proponent should ensure that the fuel
No. 36 of 1919	shall cause a nuisance or shall suffer to exist on any land or premises owned	tank is safe, and not dangerous to public
	or occupied by him or of which he is in charge any nuisance or other condition	health and that any emissions which could
	liable to be injurious or dangerous to health.	be considered a nuisance remain at
		acceptable levels.

Legislation	Summary	Applicability
Water Resources	This Act provides a framework for managing water resources based on the	The prevention of water pollution from run
Management Act	principles of integrated water resources management. It provides for the	off. Emergency oil spill kit, storm water
(2004)	management, development, protection, conservation, and use of water	control and concrete slab.
	resources. Furthermore, any watercourse on/or near the site and associated	
	ecosystems should be protected in alignment with the listed principles.	
Water Act No, 54	This act states that, all water resources belongs to the State. It prevents	Prohibition of contaminated water in the
of 1956	pollution and promotes the sustainable utilization of the resource. To protect	water body
	this resources, this act requires that permits are obtained when activities	
	involve the following;	
	(a) Discharge of contaminated into water sources such as pipe, sewer,	
	canal, sea outfall and	
	(b) Disposal of water in a manner that may cause detrimental impact on	
	the water resources	
Petroleum	This Act provides a framework for handling and distribution of petroleum	Safe handling and storage of the fuel
Product and	products which may include purchase, sale, supply, acquisition, possession,	
Energy Act No, 13	disposal, storage or transportation thereof.	
of 1990		
Labour Act No. 6	This Act aims to regulate labour in general and includes the protection of the	No employer shall require or permit an
of 1992	health, safety and welfare of employees. The 1997 Regulations relating to the	employee to work in an environment that is

Legislation	Summary	Applicability
	Health and Safety of employees at work sets out the duties of the employer,	deemed unfit without protective measures
	welfare and facilities at the workplace, safety of machinery, hazardous	in place.
	substances, physical hazards, medical provisions, construction safety and	
	electrical safety.	
Local Authorities	Provide for the determination, for purposes of local government, of local	Adherence to Windhoek Municipality by
Act, 1992 (Act 23	authority councils; the establishment of such local authority councils; and to	laws
of 1992)	define the powers, duties and functions of local authority councils; and to	
	provide for incidental matters.	
Hazardous	This ordinance gives provision to control the handling of hazardous substance	Handling of fuel, Fire and explosion risks
Substances	in all circumstances, such as manufacturing, imports and exporting of these to	
Ordinance No. 14	ensure human and environmental safety.	
of 1974		
Word's Best	Precautionary Approach Principle	Fuel retail facilities are well document in
Practises	This principle is worldwide accepted when there is a lack of sufficient	Namibia. However, fuel contains Volatile
	knowledge and information about the possible threats to the environment.	Organic Compounds (VOCs) which may be
	Hence if the anticipated impacts are greater, then precautionary approach is	cancerous and their amount that causes
	applied. In this project, there are no eminent uncertainty however in cases	cancer are poorly documented. Therefore,
	when they arise, this approach should be applied.	precaution must be taken when dispensing
	Polluter Pays Principle	fuel to vehicles.

Legislation	Summary	Applicability
	This principle ensures that proponents takes responsibility of their actions.	In the event of an accident, where spillage
	Hence in cases of pollution, the proponent bears the full responsibility to clean	may occur, the establishment owner must be
	up the environment.	responsible to clean up the environment.

Chapter 5. Environmental Management Plan

5.1. Purpose of the EMP

The key objective of this EMP is to ensure that all activities associated with proposed operation of above ground fuel storage at the construction campsite are carried out in an environmentally sustainable and legally compliant manner. It serves as a comprehensive risk management strategy designed to address and mitigate potential environmental impacts associated with the project. It provides a clear logical framework that outlines what needs to be done, how it will be monitored, and the steps to reduce potential negative effects on the environment. It ensures that environmental protection is integrated into every phase, operation, closure and decommissioning in alignment with relevant legal and regulatory requirements.

Furthermore, the EMP clearly defines the roles and responsibilities of all stakeholders involved in the project, including contractors, and regulatory authorities, to ensure accountability, effective implementation of mitigation measures, and continuous environmental performance improvement.

5.2. Compliance to the EMP

This EMP is a legally binding document as given under the provisions of the Environmental Management Act, 2007 (Act No. 7 of 2007). The Proponent and its contractors must adhere to the framework of this document.

5.3. Roles and Responsibilities

To promote accountability, effective implementation of mitigation measures, and continuous environmental performance improvement, it is essential to assign clear delegation of roles and responsibilities across all levels of the project. The following outlines the key roles and their associated responsibilities to ensure the successful implementation of the EMP.

Table 2. Roles and Responsibility

Role	Responsibility		
Proponent	1) Overall responsibility for ensuring that the project complies with		
	all environmental legislation and regulations.		

2) Allocate resources and budget for the implementation of the EMP. 3) Appoint an Environmental Control Officer (ECO) to oversee dayto-day environmental management on site. 4) Ensure that the EMP is regularly reviewed and updated to reflect any changes in project scope, legislation, or environmental conditions. 5) Liaise with regulatory authorities and stakeholders to report on environmental performance and address any concerns. Environmental 1) Monitor and ensure compliance with the EMP, environmental **Compliance Officer** regulations, and site-specific requirements. (ECO) 2) Conduct regular site inspections to verify the implementation of mitigation measures. 3) Coordinate with project personnel to ensure proper waste management, pollution control, and safety protocols are followed. 4) Prepare regular environmental performance reports, including monitoring results and corrective actions, and submit these reports to the project proponent and relevant authorities. 5) Lead training sessions for project staff on environmental best practices and legal obligations. 6) Act as the primary point of contact for environmental matters and regulatory agencies. 7) Modifying or improving mitigation measures for purposes of corrective action Site Manager Ensure the project's overall operations are conducted in accordance with the EMP and approved environmental permits. 2) Supervise all exploration activities to ensure they align with environmental guidelines. 3) Work closely with the ECO to implement corrective actions when environmental non-compliance is identified. 4) Ensure that all personnel are appropriately trained in environmental procedures and that they adhere to the safety protocols established in the EMP.

Contractors and	1)	Ensure that all contracted activities comply with the EMP and all
Subcontractors		applicable environmental regulations.
	2)	Provide their workers with adequate environmental and safety
		training.
3) Monitor and report on the environmental performance of the envi		Monitor and report on the environmental performance of their
		activities.
	4)	Implement mitigation measures specific to their scope of work as
		outlined in the EMP and ensure that they are properly maintained.
Ministry of	1)	Review and approve the EMP.
Environment,	2)	Conduct inspections and audits to ensure compliance with
Forestry and		environmental laws and regulations.
Tourism (MEFT)	3)	Provide oversight and guidance on environmental compliance.

5.4. The EMP table

The EMP is divided into three components-Physical Environment, Biological Environment, and Human Environment-to ensure ease of implementation.

5.5. Construction phase

The construction phase, including the platform and 110% containment wall has been completed, the last phase will be installation of tank on the platform (see Figure 5) and an overhead shade made of corrugated iron canopy.



Figure 5. Fuel Tank Platform and 110% spill containment wall

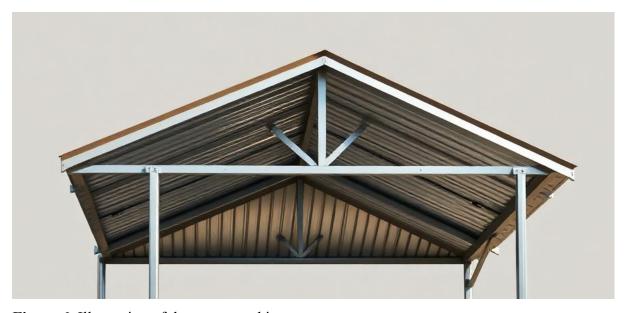


Figure 6. Illustration of the corrugated iron canopy

5.6. Operational phase

5.6.1. Human environment

Environmental	Objectives	Proposed Mitigation Measures	Monitoring Indicator	Party
/ Social Impact				Responsible
Health	To ensure good health and safety of	1. Abide to the Occupational Health and	Training minutes	Site
	the employees and public. Fuel	Safety and Labour Act of Namibia and	• Complaints of	Manager
	releases pollutants such as volatile	other statutory requirements such as	health issues by	
	organic compounds (VOCs) which	International Labour Practise (ILO)	employees	
	is known to be harmful on human	2. Train employees on the possible health	• Physical inspection	
	health. A group known as BTEX	hazards to avoid potential risks		
	(benzene, toluene, ethylbenzene	3. To reduce pressure in the fuel tank,		
	and the three isomers of xylene) is	appropriate ventilation systems must be		
	hazardous to human health and the	installed and properly maintained. This		
	environment. The International	significantly reduce the pressure from the		
	Agency for Research on Cancer	pump nozzle and consequently reduces the		
	(IARC) classified benzene as	amount inhaled;		
	"carcinogenic to humans," as it	4. In the absence of vehicle to be refuelled,		
	causes acute myeloid leukaemia	workers must not rest next to the tank, this		
	(AML)	helps in reducing long term exposure to the		
		VOCs;		

Environmental	Objectives	Proposed Mitigation Measures	Monitoring Indicator	Party
/ Social Impact				Responsible
		5. Employees at the fuel tank must go for		
		annual health checks ups.		
Safety, Fire	Hydrocarbons are highly	1. Provide appropriate Personal Protective	• PPE for all	Site
and explosion	flammable, hence the risk of fire	Equipment (PPE) to employee which	employees	Manager
risk	and explosion.	includes helmets, overalls, safety shoes, etc	Safety signs on site	
		2. Ensure that every employee goes through	• Clear emergency	
		an induction course about safety	toll free numbers	
		3. Staff must be properly trained on how to	(i.e. Police, Fire	
		react and handle fire	brigade)	
		4. Install an automatic fire alarm system		
		5. Firefighting equipment must be on site		
		24hours and regularly inspected to ensure		
		that they are working		
		6. Emergency response numbers must be on		
		clear and visible space		
		7. Tanks must clearly be labelled		
		8. The surrounding must have clear hazard		
		signs "NO OPEN FIRE" "NO		
		SMOKING" "SWITCH ENGINE OFF"		

Environmental	Objectives	Proposed Mitigation Measures	Monitoring Indicator	Party
/ Social Impact				Responsible
		9. There must be drills to test staff about their		
		readiness to fight the fire		

5.6.2. Bio-Physical Environment

Environmental /	Objectives	Proposed Mitigation Measures	Monitoring Indicator	Party
Social Impact				Responsible
Vandalism	To prevent vandalism of	1. Maintain the current fence to keep people out	Physical inspection	Site
	tanks	of site		Manager
		2. Hire security to guard the premises		
Wind risk	To prevent to the tank from	1. Ensure proper tank installation with good	Physical inspection	Site
	being blown by the wind	quality materials		Manager
Lightning risk	To prevent the tank from	1. Ensure a competent electrician install an anti-	Physical inspection	
	being struck by a lightning	lighting material		
Oil spills	To prevent oil spill which	1. Staff must be properly trained to fuel vehicles	• Physical	Site
	may result in soil and	and handle fuel	inspections	Manager
	water pollution	2. The fuelling pipes nozzle must be fitted with		
		a spill detector		
		3. The fuelling tanks must be installed on		
		concrete or metal bund		

Environmental /	Objectives	Proposed Mitigation Measures	Monitoring Indicator	Party
Social Impact				Responsible
		 4. The concrete / metal containment must be designed to hold 110% percent of the tank liquid volume 5. Waste water from the cleaning the surface must be disposed of at appropriated site, 6. Provide an oil spill kit on site and train employees on oil spill emergency response such as, oil spill absorbent booms and pads. 		
Fuel tanks oil leakage	To prevent fuel leakages from the tank	 It is recommended to acquire a double walled tank Tanks must have leak detection system Ensure the acquired tank has a lead detection 	Physical inspection	Site Manager
Storm water contamination	To prevent surface water contamination.	 The 110 % concrete / metal containment shall collect water during rain. The water must be disposed off at an appropriate place 	Visible concrete containment	Site Manager
Waste Generation	To ensure good housekeeping and prevent littering	 Provide waste bins for general waste General waste must be separated from hazardous waste; 	Waste bins on sitePhysical inspection	Site Manager

Environmental /	Objectives	Proposed Mitigation Measures	Monitoring Indicator	Party
Social Impact				Responsible
		3. Hazardous waste must be disposed of at an		
		approved site;		

Chapter 6. Contingency Plan

Contingency measure are preventative mechanism to avoid risk from occurring. With adequate implementation of preventative measures, the chances of risks occurring will be minimized. The following concise mitigation measures are recommended for implementation to avoid oil spills.

6.1. Bulk Fuel from delivery tank

To minimize the potential risks for onsite delivery and storage from delivery truck, the following mitigation measures should be implemented;

- Only use authorised fuel transport companies and individual that meets the required standards to transport fuel
- Transport companies must provide inspection report against tank leakages and all closing ends
- Employees must be properly trained to dispense fuel from the delivery truck into the storage tank
- During dispensing of fuel, the site must be demarcated with a danger tape, and it should be carried out by a competent and experience personnel
- Keep away all flammable objects during dispensing of fuel from the truck to the storage tank
- Punishment for negligence, such as leaving the valve open should be implemented

6.2. On site fuelling of vehicle

- Employees must be properly trained to fuel vehicles and handle fuel
- The fuel tank must be placed at concrete bund to prevent spill seepage
- The fuelling pipes nozzle must be fitted with a spill detector
- The concrete / metal containment must be designed to hold 110% percent of the tank liquid volume
- Waste water from the cleaning the surface must be disposed of at appropriated site,
- There must be an oil spill kit on site and train employees on oil spill emergency response such as, oil spill absorbent booms and pads.

6.3. Tank Leakages

- It is recommended to acquire a double walled tank
- Tanks must have leak detection system
- Ensure the acquired tank has a lead detection

6.4. Fire and Explosion Risk Assessment

Fire and explosion are worse case instantaneous risks in the operation fuel which are highly flammable. Consequently, fire and highly oxidant products must be kept far.

- Staff must be properly trained on how to react and handle fire
- There must be automatic fire alarm system installed at the site
- Firefighting equipment must be on site 24hours and regularly inspected to ensure that they are working
- Emergency response numbers must be on clear and visible space
- There must be clear hazard signs "NO OPEN FIRE" "NO SMOKING" "SWITCH ENGINE OFF"

6.5. Response measures

6.5.1. Minor Spill

• Clean up using oil spill kid provided and report the spill management

6.5.2. Instantaneous Major Spill

- Assess and ensure personal safety on an isolated distance
- Identity the source and cause of spill
- Eliminate all source of heat / fire
- Call the Emergency Response Numbers
- If possible, secure flow at source of spill
- Encircle the site with spill absorbent booms and pads
- In case of fire, use fire extinguisher to put out the fire
- Inform management
- Take proper record of the amount spilled
- Inform Ministry of Environment Forestry and Tourism & Ministry of Mines and Energy and City of Windhoek Municipality

6.5.3. Tank leakages

Leakages are normally minor. After establishing storage tank leakages, the following response mechanisms should be undertaken;

- Use oil spill kit to clean up the leakages
- Inform management to replace work out valves
- Close all valves as required

Chapter 7. Monitoring and Inspection

Monitoring of all equipment is important. Ensure that fire extinguisher are working normally, Storm water system are not blocked, valve are closing properly and the tank is not showing sign or erosion. There must be a daily log book to record risk activities that occurred which outline the extent of severity, causes and action taken to contain the risks. Furthermore, inspection should be caried out as the regulatory requirements.

Chapter 8. Closure / Decommissioning Plan

Closure of an above fuel tank is simple and straight forward as it requires the removal of the tanks from the concrete platform where it is mounted. The following procedures are critical during tank removal.

- 1. Prior to decommissioning, the proponent must inform the office of the Environmental Commissioner;
- 2. Ensure that the tank is completely empty of fuel
- 3. If the tank is being relocated, ensure its proper transportation
- 4. If the tank is not going to be used, contact authorised scrap yard to collect it for dismantling
- 5. All work must be supervised by qualified personnel.
- 6. Workers must be provided with all necessary PPE;
- 7. All wasted generated must be disposed of approved sites;

Chapter 9. Conclusion and Recommendations

1.1. Conclusions

An aboveground fuel tanks are common for business operation involving heavy construction vehicles and equipment. They are the safest when it comes to handling of fuel. The aspect of oil spill, fire risk, tank leakage and land /water pollution are well addressed in the EMP. Henceforth, with the adequate implementation of this EMP, the operation of the proposed fuel tank will not pose any environmental threat.

1.2. Recommendations

This study recommends to the approving authority for the issuance of environmental clearance certificate and management is recommended to ensure adequate implementation of this EMP.

Chapter 10. Annexures

10.1. Annex 1: Consent from Relevant Authority



Enquiries: S.M.K. Tuahuku

Henk Willemse Street 22;

Otjiwarongo, Namibia

3rd October 2025

Ref. No: 12/1/2-K1

Mr. Shen Pan The Managing Director China Jiangxi International Economic and Technical Cooperation Namibia Co. Ltd P.O. Box 32248 Windhoek

Dear Sir/Madam

ALLOCATION OF AN UNSERVECED PORTION OF LAND IN KALKFELD SETTLEMENT

Your application for allocation of land in Kalkfeld Settlement, bears reference.

The Regional Council during its Special Council Meeting held on the 26th September 2025, by Resolution Number OTRC SRC-009/26/09/2025/11.2, approved the allocation of a portion of land measing 10,000 square meters, for a period of two years from the date of approval.

You are required to sign a lease agreement and effect payment with effect from the date of approval. The terms and conditions of the lease will be set out in the lease agreement.

Be assured of our commitment to effective service delivery.

Yours faithfully

MR. SHIKONGO ALWEENDO ACTING CHIEF REGIONAL OFFICER

All official correspondence must be addressed to the Chief Regional Officer

Chapter 11. References:

- 1. South African National Standards (SANS)
- 2. Purdue University, Above ground petroleum tanks (A pictorial guide)