

ENVIRONMENTAL MANAGEMENT PLAN

NOVEMBER 2025



Conserve Investments cc



Existing Bulk Storage Facility and Filling Facility for liquefied Petroleum Gas

Project Title:	Environmental Management Plan for Existing Bulk Storage Facility and Filling Operation for Liquified Petroleum Gas
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List of Abbreviations

Terms	Definitions
DEA	Directorate of Environmental Affairs
EAP	Environmental Assessment Practitioner
ECC	Environmental Clearance Certificate
EHS	Environment Health and Safety
EIA	Environmental Impact Assessment
EMA	Environmental Management Act
EMP	Environmental Management Plan
HSE	Health Safety and Environment
IFC	International Finance Corporation
LPG	Liquefied Petroleum Gas
MEFT	Ministry of Environment, Forestry and Tourism
OHS	Occupational Health and Safety
PPE	Personal Protective Equipment
PS	Performance Standard
SANS	South African National Standard
SHEQ	Safety, Health, Environment and Quality

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1. Introduction

The purpose of this Environmental Management Plan (EMP) is to ensure that all environmental and social impacts associated with the operational and decommissioning activities of the LPG facility are properly managed, monitored, and mitigated. The EMP provides guidance to the proponent, employees, contractors, and relevant authorities to promote environmental protection, safety, and sustainable operations in compliance with Namibian legislation and international best practices.

2. Objectives of the EMP

- To identify potential environmental and social impacts during the operational and decommissioning phases.
- To prescribe mitigation and monitoring measures to prevent or minimize adverse impacts.
- To assign clear roles and responsibilities for environmental management.
- To ensure compliance with environmental laws, regulations, and license conditions.
- To enhance environmental awareness and accountability among employees and contractors.

3. Project Description

3.1. Project Overview

Tripple J Energies cc operates a bulk LPG facility comprising:

- One (1) pressurised LPG storage tanks with 35,000 L tank capacity
- Cylinder filling shed with automated filling equipment
- Loading/unloading bay for bulk tankers
- Firefighting and safety systems
- Office and control building
- Empty Cylinder storage warehouse

3.2. Location

The facility is located in the Rundu Industrial Area, approximately 3 km southwest of Rundu town centre, within a designated light industrial zone. Coordinates: 17°55'26.30"S. 19°45'07.53"E: Independence Avenue, erf number 1289, Extension 4.

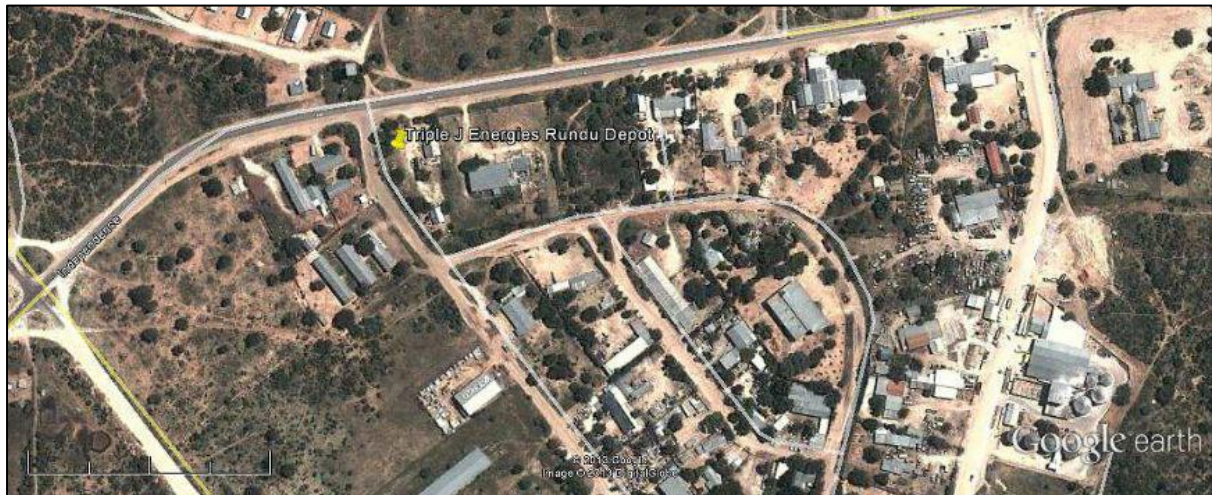


Figure 1.Site Location

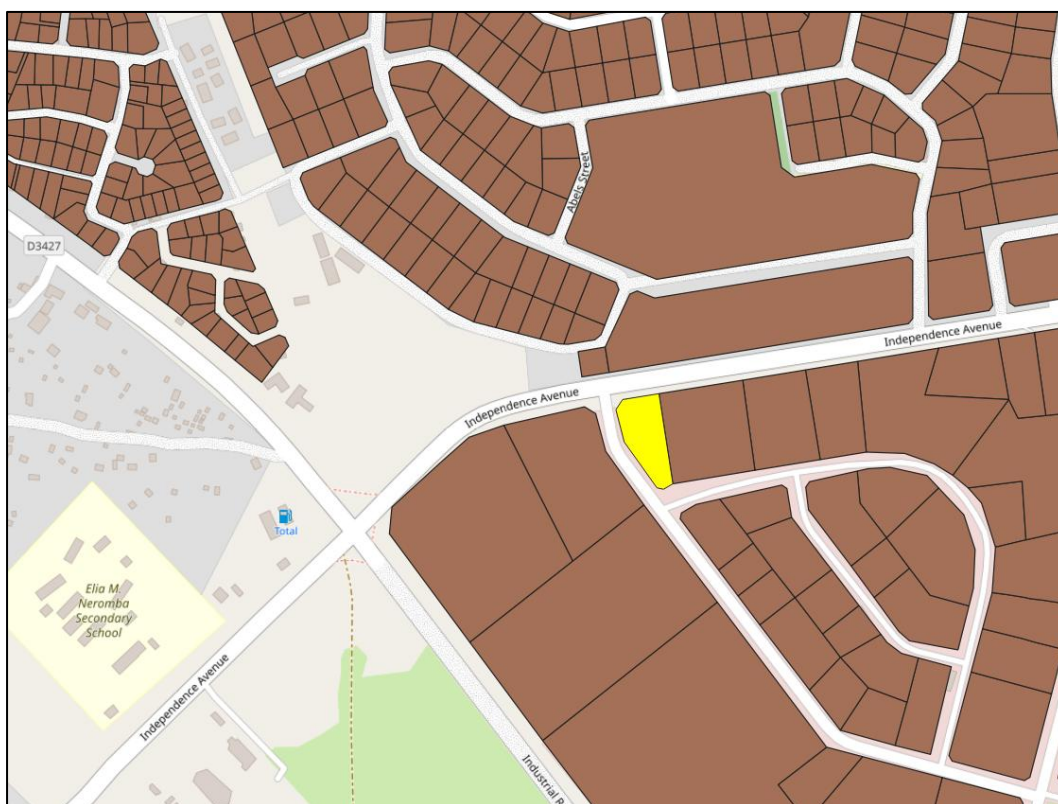


Figure 2. Site Cadastral Layout of Erf 1289

Surrounding land uses:

- Adjacent light industrial properties
- Residential area ~50 m north
- Rundu Fire Brigade ~2.5 km northeast
- Kavango River ~3.8 km east

3.3. Operations

- LPG receives bulk road tankers from South Africa or Windhoek Main Depo
- Offloaded into pressurised storage tanks
- Refilling of domestic and commercial cylinders (9 kg to 48 kg)
- Distribution: Collection by customers, distribution to local businesses
- Regular maintenance and safety checks

4. Legal and Policy Framework

Key legislation applicable to this EMP includes:

Table 1. National Framework

Regulation	Act/GN	Provision
The Namibian Constitution		<ul style="list-style-type: none"> • Promote the welfare of people • Environmental protection and sustainable use of resources
Environmental Management Act, 2007 (Promulgation of Environmental Management Act of the Parliament)	(Act No 7 of 2007) Government Notice 232 of 2007	<ul style="list-style-type: none"> • Environmental Impact Assessment (EIA) Process: A requirement for assessing and controlling activities that may have significant effects on the environment. • Environmental Clearance Certificates (ECCs): A mandate for

		<p>obtaining ECCs before undertaking certain listed activities that could impact the environment.</p> <ul style="list-style-type: none"> • Establish principles for decision-making on matters affecting the environment, • Provide a legal framework for environmental assessment and monitoring • Give effect to Article 95(l) of the Namibian Constitution (which promotes environmental protection) • Ensure community involvement in environmental decisions • Promote transparency, accountability, and environmental awareness.
<p>Environmental Management Act, 2007</p> <p>(Commencement of Environmental Management Act)</p>	<p>(Act No 7 of 2007)</p> <p>Government Notice No. 28 of 2007</p>	<ul style="list-style-type: none"> • Marked a significant milestone in Namibia's environmental governance. • The Act provides a comprehensive framework for the sustainable management of the environment, ensuring that

		<p>all activities with potential environmental impacts are properly assessed and authorized.</p> <ul style="list-style-type: none"> • It introduced the requirement for an Environmental Clearance Certificate (ECC) for certain listed activities, thereby promoting responsible development and resource use.
<p>Environmental Management Act, 2007</p> <p>(List of Activities that may not be undertaken without ECC)</p>	<p>(Act No 7 of 2007)</p> <p>Government Notice No. 29 of 2007</p>	<p>Hazardous Substance Treatment, Handling and Storage</p> <ul style="list-style-type: none"> • 9.1. The manufacturing, storage, handling or processing of a hazardous substance defined in the Hazardous Substances Ordinance, 1974. • 9.3. The bulk transportation of dangerous goods using pipelines, funiculars or conveyers with a thorough of 50 tons or 50 cubic meters or more per day. • 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. • 9.5. Construction of filling

		stations or any other facility for the underground and aboveground storage of dangerous goods, including petrol, diesel, liquid, petroleum, gas or paraffin
Environmental Management Act of 2007 (The Environmental Impact Assessment Regulations)	(Act No 7 of 2007) Government Notice No. 30 of 2007	<ul style="list-style-type: none"> • Set out the procedures and requirements for environmental assessments. • Identify listed activities that require an Environmental Clearance Certificate before they can begin. • Establish the roles, duties, and responsibilities of applicants, consultants (EAPs), and the Environmental Commissioner. • Promote public participation and transparency in environmental decision-making
The Petroleum Products and Energy Act	(Act No. 13 of 1990)	<ul style="list-style-type: none"> • Ensure the safe, efficient, and fair supply of petroleum products • Control prices and prevent unfair trading practices • Regulate licenses for importation, storage, transportation, and sale of petroleum products • Promote the development and use of renewable energy • Establish an institutional

		framework for energy policy and planning.
Local Authorities Act	(Act No. 23 of 1992) Government Notice No. 116 of 1992 of the	<ul style="list-style-type: none"> • The establishment, composition, powers, and functions of local authorities (such as municipalities, towns, and villages) • The management of local finances, services, and property
Water Resources Management Act	(Act No. 54 of 1956) (Act No. 11 of 2013)	<ul style="list-style-type: none"> • Regulate the use, control, and conservation of surface and groundwater. • Protect water supplies from pollution (though limited). Ensure the management, protection, and sustainable use of Namibia's water resources. • Prevent and control water pollution
Hazardous Substances Ordinance	(Ordinance No. 14 of 1974)	<ul style="list-style-type: none"> • Regulate and control the importation, sale, use, storage, and disposal of hazardous substances • Protect human health, animals, and the environment from the harmful effects of toxic chemicals and radioactive materials • Provide for the registration, classification, and licensing of

		hazardous substances and persons dealing with them.
Pollution Control and Waste Management Bill	draft document	<ul style="list-style-type: none"> • Provide for the prevention and regulation of discharges of pollutants into air, water and land • Establish a waste-management regime including licensing for waste collection, transport, storage, treatment, recovery or disposal activities. • Introduce the requirement for a Waste Management Licence (WML) for hazardous waste activities. • Regulate nuisances such as noise, dust, odour.
Atmospheric Pollution Prevention Ordinance (Ordinance No. 11 of 1976);	(Ordinance No. 11 of 1976)	<ul style="list-style-type: none"> • Prevent and control air pollution from industrial, domestic, and vehicle sources • Protect public health, safety, and the environment from the harmful effects of smoke, gases, fumes, and dust • Regulate industrial emissions, incineration, and fuel-burning processes • Provide for inspection, enforcement, and penalties for pollution offences.

Government Notice No. 86 of 2015 of the Public and Environmental Health Act (Act No. 1 of 2015)	(Act No. 1 of 2015) Government Notice No. 86 of 2015	<ul style="list-style-type: none"> • Promote public health and wellbeing • Protect individuals and communities from public health risks • Encourage community participation. • Provide for early detection of diseases and health risks. • Gives local authorities major responsibilities for public and environmental health within their areas. This includes maintaining hygiene, preventing nuisances, ensuring clean water for human consumption, and abating
Government Notice No. 236 of 2007 of the Labour Act (Act No 11 of 2007)	(Act No 11 of 2007) Government Notice No. 236 of 2007	<ul style="list-style-type: none"> • Entrench fundamental labour rights and protections for all employees. • Ensure the health, safety, and welfare of employees in the workplace.
South African Standards on Petroleum Liquified Gas		
South African National Standards (SANS)		<ul style="list-style-type: none"> • SANS 10087-1: The handling, storage, distribution and maintenance of liquefied petroleum gas in domestic, commercial, and industrial

		<p>installations – Part 1: Liquefied petroleum gas installations involving gas storage containers of individual water capacity not exceeding 500 litres and a combined water capacity not exceeding 3000 litres.</p> <ul style="list-style-type: none"> • SANS 10087-2: The handling, storage, distribution and maintenance of liquefied petroleum gas in domestic, commercial, and industrial installations – Part 2: Commercial and industrial installations involving gas storage containers of individual water capacity exceeding 500 litres. • SANS 10087-3: The handling, storage, distribution and maintenance of liquefied petroleum gas in domestic, commercial, and industrial installations – Part 3: Liquefied petroleum gas filling stations and depots. • SANS 10087-4: The handling, storage, distribution and maintenance of liquefied petroleum gas in domestic, commercial, and industrial installations – Part 4:
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		<p>Transportation of LPG in bulk.</p> <ul style="list-style-type: none"> • SANS 1237: Refillable liquefied petroleum gas (LPG) containers. This standard specifies the requirements for the design, construction, testing, and re-qualification of refillable LPG cylinders, ensuring their structural integrity and preventing leaks or ruptures
International Multilateral Agreements		
Stockholm Declaration on the Human Environment	Stockholm 1972	<ul style="list-style-type: none"> • Principles 2 through 5 focus on the safeguarding and sustainable management of natural resources, including air, water, land, flora, fauna, and non-renewable resources, to prevent their exhaustion and ensure equitable benefits • Principles 13 and 14 emphasize the need for integrated and coordinated development planning to ensure compatibility with environmental protection and the use of rational planning to reconcile development needs with environmental preservation • Principle 15 extends planning to human settlements and urbanization to maximize social,

		<p>economic, and environmental benefits</p> <ul style="list-style-type: none"> • Principle 21, which states that States have the sovereign right to exploit their own resources pursuant to their own environmental policies, and the responsibility to ensure that activities within their jurisdiction or control do not cause damage to the environment of other States or of areas beyond the limits of national jurisdiction. This principle is considered a cornerstone of international environmental law
United Nations Framework Convention on Climate Change (UNFCCC)		<ul style="list-style-type: none"> • While LPG is considered a cleaner-burning fossil fuel than coal or heavy fuel oil, its combustion still releases greenhouse gases, primarily carbon dioxide
Convention on Biological Diversity, Rio de Janeiro, 1992	Rio de Janeiro, 1992	<ul style="list-style-type: none"> • The Convention calls for impact assessments of proposed projects that are likely to have significant adverse impacts on biological diversity

International Standards

- IFC Performance Standards (PS1–PS4, PS6)
- IFC EHS Guidelines for Oil and Gas Storage Terminals (2017)

Table 2. International Standards.

International Standard	PS/Issues/Standards	
IFC Performance Standards	(PS1–PS4, PS6)	<ul style="list-style-type: none"> • PS1 – Social and Environmental Assessment and Management Systems • PS2 – Labour and Working Conditions • PS3 – Resource Efficiency and Pollution Prevention • PS4 – Community Health, Safety, and Security [• PS6 – Biodiversity Conservation and Sustainable Management of Living Natural Resources
<ul style="list-style-type: none"> • IFC EHS Guidelines for Oil and Gas Storage Terminals (2017) 	Environmental Issues	<ul style="list-style-type: none"> • Air Emissions: This section addresses the control of volatile organic compounds (VOCs), sulfur dioxide (SO₂), nitrogen oxides (NO_x), and particulate matter (PM) from storage tanks, loading/unloading operations, and associated equipment. • Air Emissions: This section addresses the control of volatile organic compounds (VOCs), sulfur dioxide (SO₂ •), nitrogen oxides (NO_x), and particulate matter (PM) from storage tanks, loading/unloading operations, and associated

		<p>equipment.</p> <ul style="list-style-type: none"> • Noise and Vibration: Recommendations are provided for controlling noise and vibration from pumps, compressors, generators, and other equipment to minimize impacts on workers and nearby communities • Soil and Groundwater Contamination: This section focuses on preventing spills and leaks that could contaminate soil and groundwater, as well as remediation strategies in case of contamination.
	Occupational Health and Safety (OHS) Issues:	<ul style="list-style-type: none"> • General Facility Safety: This covers aspects like fire and explosion prevention, electrical safety, confined space entry, working at heights, and machine guarding. • Chemical Exposure: Provisions address the identification, assessment, and control of risks associated with exposure to hazardous chemicals, including personal protective equipment (PPE), ventilation, and monitoring. • Physical Hazards: This includes guidance on managing risks from noise, vibration, extreme temperatures, and ergonomic hazards. • Emergency Preparedness and Response: This section emphasizes the development and

		<p>implementation of comprehensive emergency plans for fires, explosions, spills, and other incidents, including training and drills.</p>
	Community Health and Safety Issues:	<ul style="list-style-type: none"> • Emergency Preparedness and Response: This extends to potential impacts on surrounding communities, including communication plans, evacuation procedures, and coordination with local authorities. • Traffic Management: Guidance is provided on managing increased traffic due to terminal operations to minimize risks to local communities. • Security: This section addresses security measures to prevent unauthorized access, sabotage, and theft, while also considering potential impacts on community safety.

5. Environmental Management Roles and Responsibilities

Table 2. Roles and responsibilities

Role	Responsibility
Proponent / Facility Manager	Ensure overall implementation of EMP; allocate resources; report to authorities.
Environmental Control Officer (ECO)	Monitor compliance; conduct inspections; maintain records; prepare reports.
Safety, Health, Environment and Quality (SHEQ) Officer	Oversee occupational health, fire, and safety programs.
Contractors / Workers	Adhere to EMP measures and report incidents immediately.
Local Authorities / MEFT	Conduct external audits and compliance verification.

6. Environmental Management Plan

Table 3. Operation Phase -EMP

Aspect	Impact Description	Mitigation / Management Measures	Responsible Party	Monitoring Indicators / Frequency
Flora	Accidental damage from spills or expansion of facilities.	Contain spills; rehabilitate disturbed areas.	ECO / Facility Manager	Monthly visual inspection.
Fauna	Disturbance from lighting and noise; contamination risk.	Limit noise and light; secure waste; prevent habitat pollution. Maintain low night lighting (use directional lights).	ECO	Quarterly wildlife observation.
Air Quality (Dust, Odor)	Dust from traffic; LPG odor from leaks.	Maintain roads; monitor and repair leaks; conduct leak detection tests. Pave or wet driveways to suppress dust, Maintain LPG equipment and pressure systems	Facility Manager / SHEQ	Daily inspections; gas detection logs.
Soil	Contamination from accidental spills or leaks, lubricants, or other chemical	Use spill containment systems; immediate cleanup; soil testing. Install concrete containment (or Bund wall) and spill trays	Facility Manager / ECO	Quarterly soil monitoring.

		<p>under filling points.</p> <p>Immediate cleanup of spills using absorbent materials.</p>		
Surface Water	Contamination via stormwater runoff.	Install oil-water separators; direct runoff to retention areas; prevent discharge, Store hazardous substances in bunded areas.	Facility Manager	Optional: Water testing
Groundwater	Seepage from underground tanks or spills.	Regular inspection of storage tanks and pipelines for integrity (Integrity tests)	ECO	Optional: Semi-annual groundwater tests.
Noise	Noise from compressors, filling operations and vehicles.	Maintain equipment; restrict noisy operations to daytime.	SHEQ Officer	Monthly noise level monitoring.
Fire / Explosion	High risk due to flammable LPG; accidental leaks could cause fire or explosion, High risk due to LPG handling.	<p>Install gas detectors, alarms, and fire systems, (e.g., automatic sprinklers, gas detectors). conduct regular fire drills Maintain emergency response plan.</p> <p>Train staff on safe handling and emergency procedures.</p>	SHEQ Officer / Facility Manager	Weekly safety checks; emergency drills quarterly.
Traffic	Accidents or congestion from delivery trucks.	Implement traffic plan; use signage; restrict speeds; schedule off-peak deliveries.	Facility Manager	Daily driver log checks.
Waste (Litter)	Litter, packaging, or waste	Separate and recycle waste;	ECO / Facility Manager	Weekly inspections; waste

	accumulation, , or offices.	store hazardous waste safely; use licensed disposal. Maintain clean facility grounds.		manifests.
Community Engagement	Community concerns about noise or safety, Odors, or traffic	<p>Maintain open communication with local community and local authorities; hold annual public meetings</p> <p>Establish a grievance mechanism.</p> <p>Share safety and emergency information with nearby residents.</p>	Proponent / Community Liaison Officer/Facility Manager	Record of engagements.
Employment	Local job creation and skills development.	<p>Prioritize local hiring and skill development; provide safety.</p> <p>Offer fair wages and training opportunities.</p>	HR Department	Employment records; quarterly review.
Employee Health & Safety	Exposure to hazards, heat, or gas leaks and ergonomic risks.	<p>Provide PPE; regular safety training; maintain first aid and emergency plans.</p> <p>Maintain Safety, Health, Environment and Quality (SHEQ) management system.</p>	SHEQ Officer	Monthly safety audits.
Community Safety	Risk to public from accidents	Maintain buffer zones and	Facility Manager / Local Fire	Quarterly community safety

	or leaks.	emergency evacuation routes. Regularly test alarm systems. Coordinate emergency response with local authorities (fire brigade, police).	Dept.	drills.

Table 4. Decommissioning Phase-EMP

Aspect	Impact Description	Mitigation / Management Measures	Responsible Party	Monitoring Indicators / Frequency
Flora	Vegetation removal during site clearing.	Limit clearing to existing disturbed areas; rehabilitate with indigenous species.	Contractor / ECO	Weekly site inspections.
Fauna	Disturbance from human activity and noise.	Restrict to daylight hours; avoid harming wildlife; monitor presence.	ECO / Contractor	Weekly fauna log.
Air Quality (Dust, Odor)	Dust from demolition and possible LPG odor during degassing.	Wet surfaces; degas tanks before dismantling; ventilate enclosed areas.	Contractor / Safety Officer	Daily dust control checks.
Soil	Contamination from spills during dismantling.	Use spill kits and trays; clean and test soil; dispose of contaminated soil properly. Store removed fuel and oils in sealed containers	ECO / Contractor	Post-decommissioning soil tests.

Surface Water	Polluted runoff from demolition debris.	Install temporary drainage and bunding; avoid dumping near water bodies. Store hazardous materials away from drainage lines.	Contractor / ECO	Monthly inspections; water test results. when required
Groundwater	Contamination from leaks or infiltration.	Clean tanks before removal; prevent seepage; monitor groundwater. Use impermeable surfaces for dismantling operations.	Contractor / ECO	Quarterly sampling results.
Noise	Machinery and demolition noise.	Limit to daytime; maintain machinery. Maintain equipment to reduce noise emissions. Provide hearing protection to workers.	Contractor	Daily observation.
Fire / Explosion	Residual LPG vapors causing fire risk	Purge all tanks; enforce no-smoking rules; have fire equipment onsite. Degas and purge all LPG equipment before dismantling. Prohibit open flames and smoking on-site. Provide fire extinguishers and emergency response plan. Train staff on fire safety	Safety Officer / Fire Marshal/Facility Manager	Daily safety checklists; Quarterly fire drill reports.

		procedures		
Traffic	Increased heavy vehicle movement.	Implement traffic control; schedule transport during off-peak times; inspect vehicles. Implement traffic management plan.	Contractor / Site Manager	Daily vehicle logs.
Waste (Litter)	Demolition debris, scrap, hazardous waste.	Segregate and recycle waste; use licensed waste contractors; keep site clean.	Contractor / ECO	Weekly waste audit.
Community Engagement	Concerns about dust, noise, or safety.	Inform community of timelines; maintain grievance mechanism. Provide regular progress updates	Proponent / Community Liaison Officer	Monthly feedback reports.
Employment	Short-term job creation; eventual job loss.	Hire locally; provide retraining or severance support; engage workers in rehabilitation.	HR Department	Employment and retrenchment records.
Employee Health & Safety	Exposure to hazardous materials, confined spaces, and accidents.	Implement SHEQ plan; provide PPE; training and supervision. Conduct safety inductions and toolbox talks. Monitor air quality and confined space safety.	Safety Officer / Contractor	Weekly audits; incident reports.
Community Safety	Risk from gas leaks, fire, or traffic accidents.	Maintain restricted access; purge all tanks; coordinate with local emergency	Proponent / Safety Officer / Facility Manager	Emergency drill records; incident reports.

		<p>services. Maintain safety perimeter and restrict public access.</p> <p>Ensure proper handling and purging of LPG tanks before removal.</p> <p>Communicate emergency procedures to nearby community.</p> <p>Coordinate with local emergency services.</p>		

7. Monitoring and Reporting

Internal Monitoring: Conducted daily and weekly by the Environmental Control Officer (ECO).

External Auditing: Annual environmental audits by an independent consultant or MEFT-approved auditor.

Reporting:

- Monthly Environmental Compliance Reports during decommissioning.
- Bi-Annual Environmental Performance Report during operation.

Incident Reporting: All spills, fires, or non-compliances must be reported immediately to local emergency services.

8. Training and Awareness

- All employees and contractors must undergo **Environmental Induction Training**.
- Regular **Toolbox Talks** on safety, spill response, and emergency preparedness.
- Fire and evacuation drills held **quarterly**.

9. Emergency Preparedness and Response

The facility must maintain an **Emergency Response Plan (ERP)** covering:

- LPG leaks, fires, and explosions.
- First aid and evacuation procedures.
- Coordination with Rundu Fire Brigade, Police, and MEFT Regional Office.
- Regular review and simulation exercises.

10. Rehabilitation and Closure (Post-Decommissioning)

After decommissioning:

- Remove all infrastructure and waste.
- Test soil and groundwater for contamination.
- Rehabilitate site with indigenous vegetation.
- Submit a Closure and Rehabilitation Report to MEFT confirming site restoration.

11. Conclusion

The implementation of this EMP will ensure that environmental, health, and safety risks associated with the operation and eventual decommissioning of the LPG facility in Rundu are minimized. Commitment to this plan demonstrates the proponent's adherence to sustainable development principles and compliance with Namibian environmental legislation.

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13. Appendices

Appendix A. Facility Layout

