

APP-006939

**LAND RECLAMATION AND BERTH 9 MODIFICATION
PROJECT IN THE PORT OF WALVIS BAY, ERONGO
REGION
ENVIRONMENTAL MANAGEMENT PLAN**



Prepared by:



Prepared for:



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1 INTRODUCTION

The Namibian Ports Authority, Namport, is mandated by the Namibian Ports Authority Act of 1994 to control and manage ports within Namibia. To meet the growing demand for port services at the Port of Walvis Bay, Namport proposes to modify Berth 9 through land reclamation to increase onshore operational space and improve the functionality of the existing berth area (Figure 1-1). To achieve this, an environmental impact assessment was undertaken to determine the potential positive and negative impacts of the Proponent's proposed construction and operational activities on the environment. The assessment also guided the development of an environmental management plan aimed at preventing or limiting negative impacts while enhancing the positive benefits of the project.

The reclamation of land from below or above the high-water mark of the sea, as well as the construction of harbours, require environmental clearance from the Department of Environmental Affairs (DEA), Ministry of Environment, Forestry and Tourism (MEFT). An environmental clearance is required in terms of the Environmental Management Act, Act no. 7 of 2007 (EMA), as administered by the MEFT. Namport thus commissioned an environmental assessment with the purpose of, upon a favourable outcome of the assessment, applying for environmental clearance. This report presents the environmental management plan (EMP) prepared as part of the environmental assessment for the project, and it outlines measures to prevent or mitigate potential negative environmental impacts while enhancing the project's positive outcomes.



Figure 1-1 Existing commercial harbour

2 MANAGEMENT OF IMPACTS

This section presents an EMP outlining preventative and mitigating measures, based on the identified impacts.

2.1 ENVIRONMENTAL MANAGEMENT PLAN

The EMP provides management options to ensure impacts of the project are minimised. An EMP is a tool used to take pro-active action by addressing potential problems before they occur. This should limit the corrective measures needed, although additional mitigation measures might be included if necessary. Preventative and mitigating measures are thus provided for impacts. These measures should be adhered to during the various phases of construction. Ultimately the operations of the new expanded port will be incorporated into the existing operational EMP of the Port of Walvis Bay.

All contractors and personnel taking part in the construction of the expanded port should be made aware of the contents of this section, so as to plan the construction process accordingly and in an environmentally sound manner.

The objectives of the EMP are:

- ◆ to include all components of construction and related activities;
- ◆ to prescribe the best practicable control methods to lessen the environmental impacts associated with the project;
- ◆ to monitor and audit the performance of contractors and personnel in applying such controls; and
- ◆ to ensure that appropriate environmental training is provided to responsible contractors and personnel.

Various potential and definite impacts will emanate from the project. The majority of these impacts can be mitigated or prevented. The impacts, risk rating of impacts, as well as prevention and mitigation measures are listed below.

As depicted in the tables below, impacts are expected to mostly be of medium-high significance and can mostly be mitigated to have a medium to low significance. The spatial extent of impacts are mostly limited to the proposed port expansion area and the immediate surroundings. Some impacts are of a permanent nature. Due to the nature of the surrounding areas, some cumulative impacts are possible.

2.1.1 Planning

During the planning phase it is the responsibility of the Proponent to ensure they, and all contractors, sub-contractors, consultants and other personnel who will be involved with the construction of the new port area comply with all legal and industry specific requirements. Management measures must be put in place prior to, and during construction, to ensure potential environmental impacts and risks are minimised. The following actions are recommended during the planning phase and should continue for the duration of the project:

Namport

- ◆ Ensure that all necessary permits from the various ministries, local authorities and any other bodies that govern or authorise port construction are in place and remains valid.
- ◆ Ensure that reputable contractors and sub-contractors are appointed and enter into an agreement, which includes adherence to the EMP, with Namport.
- ◆ Assign a Health, Safety and Environmental Coordinator to oversee implementation of and compliance to the EMP, by all responsible parties.
- ◆ Appoint a community liaison officer who can receive and deal with complaints and suggestions and share the contact details with the community.
- ◆ Communicate Namport's various emergency response procedures and operational procedures which are relevant to construction, to the relevant contractors involved in the land reclamation project.
- ◆ For any dredging, comply with the existing EIA and EMP for dredging of the Port of Walvis Bay.
- ◆ Ensure sufficient insurance cover is available for aspects of environmental damage, pollution clean-up or restoration, if ever needed.
- ◆ Establish and maintain a reporting system to report on aspects of construction as outlined in the EMP in accordance with ECC conditions.
- ◆ Update the EIA and EMP if required and apply for renewal of the environmental clearance certificate prior to expiry.

Contractor

- ◆ Enter into an agreement with Namport which includes the EMP and environmental compliance, monitoring and reporting as required by Namport and the ECC.
- ◆ Where applicable, ensure that all requirements of the Ministry of Home Affairs, Immigration, Safety and Security are met with respect to work permits and entry into Namibia.
- ◆ Where relevant, include the EMP as part of all contracts for the procurement of services.
- ◆ Assign a Health, Safety and Environmental Coordinator to oversee the implementation of, and compliance to the EMP.
- ◆ Obtain and implement all Namport's emergency response and operational procedures.
- ◆ Ensure sufficient insurance cover is available for aspects of environmental damage, pollution clean-up or restoration, if ever needed.
- ◆ Establish and maintain a reporting system to report on aspects of construction as outlined in the ECC and as in agreement with Namport.

2.1.2 Employment

The construction of the expanded port area will require various contractors, sub-contractors, building materials, equipment and infrastructure. Employment within goods and services suppliers' businesses will thus be sustained and new job opportunities may be created. Once operational, the new expanded port will require Namport to appoint new employees to be able to manage the larger footprint. However, more importantly, the additional space will be available to various new port tenants who will through both construction and operations sustain and create employment.

Desired outcome: Provision of employment to local Namibians and adhering to Namibian legal requirements with respect to work permits.

Actions:

Enhancement:

- ◆ If the skills exist locally, contractors and employees must first be sourced from the town, then the region and then nationally. Deviations from this practise must be justified.
- ◆ Work permits for foreign employees and contractors.

Responsible Body:

- ◆ Proponent
- ◆ Contractors

Data Sources and Monitoring:

- ◆ Immigration Control Act 7 of 1993.
- ◆ Work permits and employee contracts on file.
- ◆ Bi-annual reporting based on employee records that provides details on number of employees and demographic profile such as male vs. female, local vs. foreign, and disabled employees).

2.1.3 Revenue Generation

During construction, contractors, resources and services will be procured locally where available and feasible, contributing to the economy of the town, region and Namibia. Through the efficient functioning of the expanded Port of Walvis Bay, additional operational opportunities will be available in the port, also contributing to revenue generation. Payment of employees' salaries and wages contribute to the overall economy of the town, region, Namibia and SADC countries exporting and importing goods via Walvis Bay.

Desired outcome: Revenue generation and contribution to the local, regional, Namibian and SADC economy.

Actions:

Enhancement:

- ◆ The Proponent must employ local Namibians and source Namibian contractors, goods and services as far as is practically possible. Deviations from this practise must be justified.
- ◆ Resources and services must be procured locally, if available. Deviations from this must be justified.
- ◆ Payment of taxes and remuneration in accordance with Namibian legislation.

Responsible Body:

- ◆ Proponent

Data Sources and Monitoring:

- ◆ Where requested, proof must be provided to show that goods and services are procured locally, and if this is not the case, justification for foreign acquisition of such goods and services must be provided.
- ◆ Bi-annual reporting based on employee records that provides details on number of employees and demographic profile such as male vs. female, local vs. foreign, and disabled employees).

2.1.4 Skills, Technology and Development

Through employment and contracting of local companies and employees for certain aspects of construction, some skills will be transferred to an unskilled workforce and technologies that are new to Namibia may be introduced. Development of people and technology are key to economic development.

Overall operations of the Port of Walvis Bay may promote the port as a reliable location to conduct port related business ventures. This may further stimulate technological development in the port with associated benefits of training of employees and acquiring of new skills.

Desired outcome: To see an increase in skills of local Namibians, as well as development and technology advancements in the port.

Actions:

Enhancement:

- ◆ If the skills exist locally, contractors and employees must first be sourced from the town, then the region and then nationally. Deviations from this practise must be justified.
- ◆ Skills development and improvement programs to be made available as identified during performance assessments.
- ◆ Training and skills development must be focussed on Namibians.
- ◆ Employees to be informed about parameters and requirements for references upon employment.

Responsible Body:

- ◆ Proponent
- ◆ Contractors

Data Sources and Monitoring:

- ◆ Record should be kept of all training or development programmes provided to Namibians.
- ◆ Ensure that all training is certified or managerial references provided (proof provided to the employees) inclusive of training attendance, completion and implementation.
- ◆ Bi-annual reporting summarising any training or skills development programmes provided to Namibians.

2.1.5 Demographic Profile and Community Health

Impacts related to the demographic profile and community health relate to the influx of people (foreigners and Namibians) to the town, and the potential social ills and deviant behaviour that often accompany such events. This includes the spread of communicable diseases such as HIV/AIDS and increased criminal activities. Additional employment opportunities also mean more spending power which can lead to increased misuse of alcohol and drugs.

For the duration of construction there will be an influx of foreign people in Walvis Bay. Contractors, employees or consultants may be sourced in Namibia and may require temporary accommodation and offices in town. Due to the scale and duration of construction it is foreseen that the influx of people will create a significant or permanent change in the demographic profile of the local community, and may result in significant instances of socially deviant behaviour.

The prospects of more operators in the port may entice jobseekers to migrate to the town. The probability of negative impacts occurring, as discussed above, thus increases. More pressure will be placed on goods and services supply and housing.

Desired Outcome: To prevent growth in informal settlements and an increase in social ills, the spread of communicable diseases, and prevent / discourage socially deviant behaviour and criminal activities.

Actions:

Enhancement

- ◆ Timely information sharing with local, regional and national authorities as well as the suppliers of services to ensure timely development of the town and services to meet growing demands.
- ◆ As far as is practically possible, Namibian contractors and support services must be sourced from the town, region or nationally (if available). Deviations from this practice should be justified appropriately.
- ◆ Appoint reputable contractors with a proven track record of social responsibility.
- ◆ Maintain a comprehensive employee wellness program, ensuring that relevant support are provided to employees with information sessions on aspects such as dangers and prevention of communicable diseases such as HIV/AIDS, alcohol and drug abuse, and sound financial planning.
- ◆ No intoxicating substances, or persons under the influence of such substances, may be allowed in the port and construction areas.
- ◆ Adhere to all applicable laws and regulations relating to public and environmental health (e.g. sanitation requirements, work conditions, etc.).
- ◆ Disciplinary steps, within the legal parameters of Namibia, to be taken for socially deviant behaviour during working hours, should be clearly stipulated in employment contracts.

Mitigation

- ◆ Take disciplinary action against employees not adhering to contractual agreements with regard to socially deviant behaviour (e.g. alcohol or drug abuse during working hours).

Responsible Body:

- ◆ Proponent
- ◆ Contractors

Data Sources and Monitoring:

- ◆ Bi-annual reporting summarising employee demographics, educational programmes provided, information session attendance and training conducted.

2.1.6 Health, Safety and Security

Construction and operations rely on human labour who are exposed to health and safety risks. Working at heights and in confined spaces, diving, handling of hazardous chemicals, working with machinery all pose risks.

During operations, working with machinery, unsafe stacking, falling from heights and handling of hazardous chemicals (inhalation of dust and potential health effects chemicals), poses risks to employees. If not contained, windblown dust may further pose health risk to nearby receptors.

The Namibian coast is characterised by very cold water and rough conditions. Falling in the water and being exposed to cold water, will quickly result in hypothermia which may rapidly become fatal.

Security risks are related to unauthorised entry, theft and sabotage.

Desired Outcome: To prevent injury, health impacts and theft.

Actions

Prevention

- ◆ Implement and maintain an integrated health and safety management system, to act as a monitoring and mitigating tool, which includes operational, safe work and medical procedures, permits to work, emergency response plans, housekeeping rules, material safety data sheets (MSDS) and signage requirements (personal protective equipment (PPE), flammable etc.).
- ◆ Appointment of reputable contractors with a known history of responsible and safe construction practices.
- ◆ All Health and Safety standards specified in the Labour Act, or better, should be followed.
- ◆ Clearly label dangerous and restricted areas as well as dangerous equipment and products. This includes strict security to prevent unauthorised entry.
- ◆ Provide all employees with required and adequate PPE.
- ◆ Ensure that all personnel receive adequate training on operations of equipment / handling of harmful materials.
- ◆ Equipment on site must be stored in a way that does not encourage criminal activities (e.g. locked away to prevent theft).
- ◆ Security procedures and proper security measures must be in place to protect workers.
- ◆ Dredging, if any, to adhere to the approved dredging EMP of the Port of Walvis Bay.

Mitigation

- ◆ Selected personnel should be trained in first aid and a first aid kit must be available on site. The contact details of all emergency services must be readily available.
- ◆ Implement emergency response procedures in case of incidents.

Responsible Body:

- ◆ Proponent
- ◆ Contractors

Data Sources and Monitoring:

- ◆ Industry standards and protocols, etc.
- ◆ An up-to-date health and safety file to be maintained.
- ◆ Any incidents or complaints must be recorded with action taken to prevent future occurrences.
- ◆ A bi-annual report should be compiled of all incidents reported. The report should contain dates when training were conducted and when safety equipment and structures were inspected and maintained, incidents or complaints received, including action taken to prevent future occurrences, must be included.

2.1.7 Traffic: South Gate Route

Construction activities will increase traffic through the town to deliver constructing material, equipment, infrastructure, as well as filling material for land reclamation (if sourced from land). Should the latter be required, it will result in a significant temporary increase in traffic. Routes through town and into the port are limited. For this route, construction traffic is expected to increase along the D1986 from Swakopmund and along 5th Road leading towards the South Gate of the Port of Walvis Bay. The increase in construction vehicles along the South Gate route moves through an area that consists mostly of residential neighbourhoods, as well as several guesthouses and/or restaurants. The route is commonly used by residents to travel to and from work, to drop off and pick up children from school, and by tourists visiting the marina, the salt pans and the Walvis Bay Lagoon. In addition, heavy motor vehicle (HMV) movements along the B2 (Walvis Bay–Swakopmund road) are expected to increase due to the loading and transport of fill material from the North Port area, with HMVs turning onto the B2 from the North Port loading area. This will increase the likelihood of traffic delays and congestion (particularly at turning points and intersections), traffic incidents, and road surface damage along affected routes.

Future operations of the new port area will increase traffic on the roads through town, to and from the port. This will however mainly be via the Main Gate. HMV may result in an increased, cumulative impact on the road surface of the area, especially when turning on these roads. Trucks parking in town may block business' entrances and increase the likelihood of accidents and incidents.

Desired Outcome: Minimum impact on traffic, no transport or traffic related incidents, good quality roads.

Actions

Mitigation

- ◆ Continuous consultation with the Walvis Bay Town Council, Roads Authority and port users to find feasible measures and alternative to alleviate traffic congestion in town (for both construction and operational phases. This could include investigation and implementation of truck staging areas outside town, alternative access roads, bridges, etc.
- ◆ Trucks should not be allowed to park, overnight or obstruct any traffic in areas surrounding the port and the town.
- ◆ HMVs associated with construction activities (including the hauling of fill material) should be granted pre-arranged, quick access to the Port via the Southern gate, to avoid HMVs queuing on public roads and contributing to congestion in and around Walvis Bay.
- ◆ HMVs hauling fill material should be restricted to approved operating hours to reduce traffic congestion and disturbance along residential sections of the route: 07:30–18:00 only. Along 5th Road no hauling should occur between 12:30 and 14:00, to reduce peak congestion and increase safety associated with lunchtime traffic, school-related movements and access to the Walvis Bay marina and neighbouring facilities
- ◆ Adhere to The Road Traffic and Transport Regulations and all other applicable legislation related to road transport and maximum axle loads.
- ◆ If any traffic impacts are expected, such as during delivery of abnormal loads, traffic management should be performed.
- ◆ The placement of signs to warn and direct traffic or placement of marshals at potentially high incident areas (close too schools, at four way stops and at the North Port access intersection) will aid in mitigation of traffic impacts.

Responsible Body:

- ◆ Proponent
- ◆ Contractor

Data Sources and Monitoring:

- ◆ The Road Traffic and Transport Regulations, 2001.

- ◆ Any complaints received regarding traffic issues should be recorded together with action taken to prevent impacts from repeating itself.
- ◆ A bi-annual report should be compiled of all incidents reported, complaints received, and action taken.

2.1.8 Traffic: Main Gate Route

Construction activities will increase traffic through the town to deliver constructing material, equipment, infrastructure, as well as filling material for land reclamation (if sourced from land). Should the latter be required, it will result in a significant temporary increase in traffic. Routes through town and into the port are limited. For this route, construction traffic is expected to increase along the D1986 from Swakopmund as well as along 18th Road and other routes leading towards Main Gate of the Port of Walvis Bay. This route is situated within a business and industrial area and already carries high volumes of traffic. The majority of vehicle movements consists of HMs accessing and servicing businesses in the area, including logistics companies, oil and gas operations, storage warehouses and fishing factories. The route also accommodates much of the cargo-related traffic travelling to and from the Port via the Main Gate and the Container Gate located on Gertrude Rikumba Kandanga Hilukilwa Road. In addition, HMV movements along the B2 (Walvis Bay–Swakopmund road) are expected to increase due to the loading and transport of fill material from the North Port area, with HMs turning onto the B2 from the North Port loading area. This will increase the likelihood of traffic delays and congestion (particularly at turning points and intersections), traffic incidents, and road surface damage along affected routes.

Future operations of the new port area will increase traffic on the roads through town, to and from the port. Heavy motor vehicles (HMV) may result in an increased, cumulative impact on the road surface of the area, especially when turning on these roads. Trucks parking in town may block business' entrances and increase the likelihood of accidents and incidents.

Desired Outcome: Minimum impact on traffic, no transport or traffic related incidents, good quality roads.

Actions

Mitigation

- ◆ Continuous consultation with the Walvis Bay Town Council, Roads Authority and port users to find feasible measures and alternative to alleviate traffic congestion in town (for both construction and operational phases. This could include investigation and implementation of truck staging areas outside town, alternative access roads, bridges, etc.
- ◆ Trucks should not be allowed to park, overnight or obstruct any traffic in areas surrounding the port and the town.
- ◆ HMs associated with construction activities (including the hauling of fill material) should be granted pre-arranged, quick access to the Port via the Main gate, to avoid additional HMs queuing on public roads and contributing to the congestion in and around Walvis Bay.
- ◆ Adhere to The Road Traffic and Transport Regulations and all other applicable legislation related to road transport and maximum axle loads.
- ◆ If any traffic impacts are expected, such as during delivery of abnormal loads, traffic management should be performed.
- ◆ The placement of signs to warn and direct traffic or placement of marshals at potentially high incident areas (at four way stops and at the North Port access intersection) will aid in mitigation of traffic impacts.

Responsible Body:

- ◆ Proponent
- ◆ Contractor

Data Sources and Monitoring:

- ◆ The Road Traffic and Transport Regulations, 2001.
- ◆ Any complaints received regarding traffic issues should be recorded together with action taken to prevent impacts from repeating itself.
- ◆ A bi-annual report should be compiled of all incidents reported, complaints received, and action taken.

2.1.9 Seafaring Traffic

Seafaring traffic may experience delays or in extreme instances be involved in collisions or allisions due to the construction activities in the port area. Delays in ship arrivals or departures at the port can disrupt the timely delivery of goods, interfere with cruise liner schedules, affecting the tourism industry, and lead to a build-up of export-bound cargo within the port. The possibility for such events occurring increases when the proper navigational warnings are not issued, or vessels that are not seaworthy, and without proper communications systems, operate within the area.

Desired Outcome: Minimum impact on seafaring traffic and no accidents.

Actions

Prevention

- ◆ Proper communication, management and planning will largely prevent seafaring vessel delays and accidents.
- ◆ Timely issuing of navigational warnings (Namport).
- ◆ Planning and communication with regular provision of construction updates to the Port Captain.
- ◆ All communications, navigational and warning systems on the vessel in working order and regularly tested and maintained.

Mitigation

- ◆ Should an incident occur, it must immediately be reported to the Port Captain, followed by a detailed report within 24 hours, and corrective action should be taken to prevent any future occurrences of such events.

Responsible Body:

- ◆ Proponent
- ◆ Contractor

Data Sources and Monitoring:

- ◆ Part III of the regulations proclaimed under the Namibian Ports Authority Act; Merchant Shipping Act; Marine Traffic Act.; Convention on the International Regulations for Preventing Collisions at Sea; International Convention on Standards of Training, Certification and Watchkeeping for Seafarers
- ◆ Ships' logs to be duly maintained.
- ◆ Any complaints or incident reports received from seafaring traffic, with regard to port construction, should be recorded together with corrective action taken and measures implemented to prevent impacts from repeating itself.
- ◆ Bi-annual reporting on all seafaring traffic related incidents reported, complaints received, and action taken.

2.1.10 Fire and Explosion Risk

Products used during construction, e.g. fuel, solvents, lubricants, etc., may be flammable to varying degrees. Whilst unlikely, these may become explosive under very specific conditions and in confined spaces. The primary causes of such accidents may include human error, technical failures and inadequate maintenance. Dredging also pose fire risks on board the dredging vessel.

Desired Outcome: To prevent injury or physical damage as a result of fire or explosions.

Actions

Prevention

- ◆ A holistic fire protection and prevention plan is needed. This plan must include an emergency response plan, firefighting plan and spill recovery plan, and should include specific substances handled at the site. The plan should consider risks posed to and by neighbouring properties.
- ◆ Appointment of reputable contractors with known histories of responsible and safe construction practices.
- ◆ Share the requirements for firefighting based on the products kept on site with Namport.
- ◆ Ensure all materials are stored strictly according to MSDS instructions. This include segregation of incompatible products.
- ◆ Maintain firefighting equipment, implement good housekeeping and conduct personnel training (firefighting, fire prevention and responsible housekeeping practises).
- ◆ Operations of the dredger must be according to the approved EMP for dredging.

Mitigation

- ◆ Implement the emergency and firefighting plan immediately if a fire is detected.

Responsible Body:

- ◆ Proponent
- ◆ Contractor

Data Sources and Monitoring:

- ◆ Record should be kept of all inspections and maintenance performed on firefighting equipment (date of last service, date of next service, replacement date, etc.).
- ◆ Record should be kept of all training related to firefighting, fire drills and evacuation procedures.
- ◆ Record should be kept of all inspections and maintenance performed on equipment whose failure may result in a fire and/or explosion. This include electrical installations, fuel storage and reticulation, etc.
- ◆ Any incidents must be recorded with action taken to prevent future occurrences.
- ◆ Bi-annual report on all record keeping and incidents, including corrective action taken.

2.1.11 Noise and Vibration

Noise and vibrations are closely linked. The main noise-generating activities that will result from port construction activities are related to the installation of the steel sheet piles, pile driving (if conducted), compaction of fill material, and HVM movements through town. In addition, increased HVM movements associated with hauling fill material may result in intermittent elevated noise levels along the transport routes and at access control points, particularly at the South Gate entrance, where vehicle queuing, braking, accelerating and idling may increase noise levels in the immediate residential area.

Operational noise will vary depending on the activities of tenants, but will likely include vehicle and train noise, audible warning signals, cranes, the picking up and putting down of skips and containers, vessel engine noise, and the opening and closing of doors and hatches. Noise can cause permanent hearing loss if continued exposure to loud noises occurs, or can be a nuisance to nearby community members such as at residences and accommodation establishments. Whole body vibration is common in vehicle and heavy machinery operators. It can cause lower back pain, motion sickness, bone damage and digestive issues. Long-term exposure may lead to fatigue, drowsiness and reduced concentration. Hand-arm vibration affects workers using power tools. It can result in nerve damage, vascular disorders and musculoskeletal problems.

Not only living organisms are affected by vibrations. Machinery and structures also undergo wear and tear, as vibration leads to accelerated mechanical fatigue and component degradation, loosened joints, cracks, and structural instability.

Noise impacts are expected to be most pronounced during the construction phase and during periods of peak operational activity. Appropriate mitigation (e.g. limiting unnecessary idling, maintaining equipment and vehicles, implementing traffic management at the South Gate, and restricting high-noise activities to daytime where feasible) will assist in reducing nuisance effects and worker exposure.

Desired Outcome: To ultimately reduce noise and vibration levels in order to prevent hearing loss and other health impacts on workers, side-effects of vibration, a nuisance to nearby receptors, and impacts on animals. Where noise and vibration levels cannot be lowered, the potential impacts thereof must be minimised.

Actions

Mitigation

- ◆ The potential noise levels and construction schedule should be discussed with all noise sensitive receptors staying within 500 m from the construction and future operational site. Measures that will be used to reduce noise levels should be highlighted
- ◆ The Health and Safety Regulations of the Labour Act and World Health Organization (WHO) guideline on maximum noise levels (Guidelines for Community Noise, 1999) to prevent hearing impairment for workers on site and not to be a nuisance to communities should be considered during the construction and operational phases.
- ◆ Confine noise generating operational activities to daytime hours as far as possible.
- ◆ Should piles be installed, water jet-assisted piling (pile jetting) and/or press-in (static jacking) should be used where geotechnically feasible to minimise noise and vibration.
- ◆ Shrouds, noise barriers and acoustic enclosures must be used to limit noise.
- ◆ Contractors that use newer, quieter equipment should be appointed. Equipment should be well maintained as per manufacturers requirements, with the engine compartments closed.
- ◆ Induction training should include an environmental noise component, which should be given to all employees and contractors, highlighting the sensitivity of the area to noise. Sources of noise should be highlighted, especially the potential impact of material handling noises.
- ◆ Use white noise alarms (squawkers) instead of tonal reverse alarms on heavy vehicles and fork-lifts operating within the port area and consider changes to policies and guidelines for contractors and port users.

- ◆ Hearing protectors must be issued as part of PPE when working in noisy environments.
- ◆ Mechanisms to reduce vibration impact must be employed. This includes frequently rotating operators and wearing of PPE such as vibration absorbing gloves.
- ◆ Any machinery and vehicles that cause excessive vibrations should be given defect notices and taken off site immediately. Machinery and/or vehicles may only be used again on site once they have been serviced and approval has been granted by the site supervisor.
- ◆ Unnecessary vibrations can be minimised by ensuring that no machinery or vehicles are left idling when not in use.
- ◆ The appropriate and correct placement of specific work activities can ensure the reduction of handling of machinery that cause heavy vibrations. Careful placement of infrastructure and transport routes to, from and within the modification area can optimise the noise-reduction effectiveness of walls and buildings. This could include locating loading and unloading activities to allow buildings to act as noise barriers.
- ◆ Namport could install a real-time noise monitoring system to provide immediate and accurate noise levels to the contractors and Namport.
- ◆ Conduct annual noise auditing to assist in classify noise sources, defining the associated noise levels (magnitude of the noise emission levels) and identify the specific measures that could reduce noise levels.
- ◆ Investigate reasonable and valid noise complaints and implementing viable noise management measures

Responsible Body:

- ◆ Proponent
- ◆ Contractors

Data Sources and Monitoring:

- ◆ Health and Safety Regulations of the Labour Act and WHO Guidelines on Community Noise
- ◆ Maintain a register to record complaints received from workers and the general public. Complaints should be investigated and if required, a noise and vibration survey should be conducted.
- ◆ Bi-annual reporting of all record keeping, including corrective action taken.

2.1.12 Waste

Various types of waste will be produced during the construction phase and the volume of waste originating from the port will increase during the operational phase. Where waste is not securely stored, it may be blown into the sea or town during strong winds and may wash up on the coastline or blow into the desert. This form of pollution will not only have a visual impact, but may also negatively impact on marine and terrestrial animals like dolphins, seals and birds (e.g. entanglement, accidental ingestion, etc.).

Some wastes are hazardous and may deteriorate the quality of the environment, especially the waters in the bay (see section 2.1.13).

Desired Outcome: To reduce the amount of waste produced and prevent pollution of the environment.

Actions

Prevention

- ◆ Appointment of reputable contractors with a known history of environmental responsibility.
- ◆ Communicate proper waste disposal procedures to the contractor and employees.
- ◆ Waste reduction measures should be implemented and all waste that can be re-used / recycled must be kept separate.
- ◆ Ensure adequate temporary waste storage facilities are available within the confines of the port and ensure waste cannot be blown away by wind.
- ◆ Prevent scavenging (human and non-human) of waste.
- ◆ For hazardous substances, see the material safety data sheets available from suppliers for disposal of contaminated products and empty containers.

Mitigation

- ◆ Waste should regular be disposed of at appropriately classified disposal facilities, this includes hazardous materials (empty chemical containers and contaminated rugs, paper, water and soil), if any.
- ◆ To prevent people from using potentially contaminated containers for transport or holding of drinking water, all containers that will be discarded must be crushed or punctured prior to disposal.

Responsible Body:

- ◆ Proponent
- ◆ Contractors

Data Sources and Monitoring:

- ◆ A record should be kept of any disposal of hazardous waste.
- ◆ Any complaints received regarding waste should be recorded with notes on action taken.
- ◆ Bi-annual reporting on all record keeping, including corrective action taken.

2.1.13 Water Quality

Impacts on water quality may negatively affect various receptors such as aquatic organisms, mariculture farms and seawater intakes (fish processing). Water quality can deteriorate during construction as a result of mixing of sediment in the water column (during dredging or filling of the reclaimed area), spilled or leaked hydrocarbons and chemicals directly entering the water or being blown/washed into the water from nearby surfaces.

The preferred filling material is stockpiled dredged material originating from the North Port dredging operations. Previous sediment sampling indicated that certain metals, including arsenic, cadmium, chromium and nickel, were elevated. During filling, displaced water may decant/seep back into the harbour basin and may carry fine suspended solids and contaminant-bound particles. If not adequately managed, this may contribute to localised reductions in water quality.

Where piling is required, pile installation (including any water jet-assisted piling/jetting, if used) may disturb seabed sediments and temporarily increase turbidity and suspended sediment concentrations in the immediate vicinity of the works area.

With the modified Berth 9 quay wall, the berth will be able to accommodate a broader range of vessels and operational uses, while remaining the primary berth for passenger cruise liners. Where cargo handling and associated loading/offloading activities occur, there is an increased potential for dust to be generated and, under windy conditions, for dust to be blown into the harbour water.

Many pollutants that can enter the water may result in reproductive abnormalities and reduced fertility, which may put the local food web at risk. It may also accumulate in aquatic organisms, especially filter feeders like mussels and oysters and magnify in higher trophic levels where physiological stress and abnormalities can realise. For the mariculture industry, it may prevent the export of mariculture products and causes financial losses if pollution plumes reach mariculture areas.

Desired Outcome: To protect sensitive receptors against impacts of reduced water quality as a result of construction activities and pollution

Actions

Prevention

- ◆ Appointment of reputable contractors with a known history of environmental responsibility.
- ◆ Regularly inspect and maintain all vehicles and infrastructure, to minimise the chances of infrastructure failure. Regular training and refresher courses for operators of machinery and infrastructure that can cause pollution.
- ◆ Vehicles and heavy machinery should not be serviced on site.
- ◆ Dredger operators must adhere to the approved EMP for dredging.
- ◆ Fill placement must be controlled to minimise decanting of turbid water into the harbour basin (e.g. controlled placement rates).
- ◆ Port tenants must, where applicable, conduct their own EIA and operate according to their EMP which must be in line with the port's EMP.

Mitigation

- ◆ Use drip trays to contain leaks and repair such leaks before continuing to use the equipment/vehicle.
- ◆ Clean-up action must be taken immediately for all instances where any hazardous (and non-hazardous product is spilled or leaked).
- ◆ Where relevant a conditions survey should be conducted post-clean-up to confirm successful clean-up.
- ◆ For large spills containment equipment must be available such as absorbents and booms for oil spills in the ocean.

- ◆ Adjust jetting pressure and flow rate (and limit jetting duration) to the minimum required to achieve penetration, in order to reduce sediment mobilisation and plume formation.
- ◆ Implement turbidity and/or visual plume monitoring during dredging and fill placement with trigger levels and immediate corrective action where elevated turbidity persists or approaches sensitive receptors.
- ◆ Regular inspection and reporting on non-compliance to EMP requirements. Issue non-compliance order and follow up to confirm corrective action taken.

Responsible Body:

- ◆ Proponent
- ◆ Contractors

Data Sources and Monitoring:

- ◆ Inspection registers, logging of incidents, reporting of incidents, corrective action taken and inclusion in bi-annual report.

2.1.14 Ecological

Construction activities will impact the marine ecosystem in a localised small footprint. The area earmarked for land reclamation has already been disturbed through previous dredging undertaken during the construction of the new container terminal and Berth 9; however, any remaining ecological features within the reclamation footprint will be permanently lost as the area is filled. No range restricted endemic or unique species are expected or known of in the area.

Marine mammals do not frequent the area earmarked for construction and they will likely avoid the area during construction as a result of noise and activity.

During operations, various structures can act as suitable areas for birds to roost or nest. Bright lights used at night may impact birds like flamingos that fly at night. They may become blinded and disorientated, causing collisions with structures or veering off course.

Operational impacts will mostly be the same as that of the existing port, although at a larger scale.

Desired Outcome: To prevent or minimise destruction, degradation and disturbance of the ecological environment.

Actions:

Prevention

- ◆ Appointment of reputable contractors with a known history of environmental responsibility.
- ◆ Clearly define the footprint of the project area and work within this footprint at all times.
- ◆ Follow the EMP sections on noise, water quality and waste in order to minimise impacts on marine and terrestrial organisms and the environment.
- ◆ Dredger operators must adhere to the approved EMP for dredging.
- ◆ Port tenants must, where applicable, conduct their own EIA and operate according to their EMP which must be in line with the port's EMP.
- ◆ If any mortalities in marine fauna are observed at or around the construction site, it should be reported to the Directorate of Fisheries and the cause investigated and corrective action implemented if applicable.

Mitigation

- ◆ All lighting should be directed downwards to construction and operational areas to not blind birds flying at night.
- ◆ Use the minimum lighting required for safe operations and use auto dimming lights when no activity is ongoing.
- ◆ Record any bird strikes and take corrective action if needed.

Responsible Body:

- ◆ Proponent
- ◆ Contractor

Data Sources and Monitoring:

- ◆ Record any marine mammal sightings and any other significant encounters or observations of animals and birds (including sick or dead animals) and report these to the local offices of the MEFT and MAFWLR.
- ◆ Bi-annual reporting of all record keeping, including corrective action taken.

2.1.15 Visual

The modification project will increase the footprint of the commercial harbour, while the industrial nature and visual character of the area will remain largely unchanged. The main noticeable visual change associated with the project is expected to be during the construction phase, particularly due to the use of large crawler cranes, construction plant and temporary works within the Berth 9 area. Once operational, the reclaimed area will form part of the existing port environment and is expected to read as a continuation of the established industrial harbour landscape. Overall, visual impacts are therefore expected to be low to moderate, given that the project is located within an existing developed port footprint and will not introduce land uses that are visually inconsistent with the surrounding port environment.

Desired Outcome: To minimise the negative visual impact of the project.

Actions

Mitigation

- ◆ Confine construction to day time only.
- ◆ Contain construction and establishment activities within specifically demarcated areas with the smallest footprint possible.
- ◆ Regular waste disposal at an approved landfill site.
- ◆ “Housekeeping” procedures should be developed for the Project to ensure that the Project sites and lands adjacent to the Project sites are kept clean of debris, garbage, graffiti, fugitive trash, or waste generated onsite; procedures should extend to control of “track out” of dirt on vehicles leaving the port area.
- ◆ Install light fixtures that provide precisely directed illumination to reduce light “spillage” beyond the immediate surroundings of the site.
- ◆ Minimise the number of light fixtures to the bare minimum, including security lighting, and utilise motion-activated/security-triggered lighting where feasible.
- ◆ Minimise the number of light fixtures to the bare minimum, including security lighting.

Responsible Body

- ◆ Proponent
- ◆ Contractors

Data Sources and Monitoring:

- ◆ Record all complaints received and investigate the validity of such complaints. Record all corrective measures taken.
- ◆ A bi-annual report should be compiled of all complaints received and actions taken.

2.1.16 Infrastructure

Damage can be caused to the existing port infrastructure during the construction phase. This may temporarily disrupt port services or create unsafe working conditions.

Desired Outcome: To prevent the damage to existing port infrastructure.

Action:

Prevention

- ◆ Appointment of reputable contractors with a known history of safe and responsible work practices.
- ◆ Trained operators of equipment.
- ◆ Emergency response plan with contact details of emergency personnel.
- ◆ Inform relevant stakeholders of the intention to work close to their facilities.
- ◆ Ensure the proper and correct functioning of all operational equipment and warning systems.

Mitigation

- ◆ Implement emergency response plan if any incident occurs.

Responsible Body:

- ◆ Proponent
- ◆ Contractors

Data Sources and Monitoring:

- ◆ Record and report to Namport any incidents with the corrective actions taken.
- ◆ Bi-annual report of all record keeping and the proof of reporting of any incidents to Namport.

2.2 DECOMMISSIONING

Closure and decommissioning of the modified Berth 9 as a whole is highly unlikely. However, it is possible that certain components of the project—such as auxiliary structures or civil infrastructure—may be decommissioned, upgraded or replaced at a later stage. Decommissioning is therefore included for this purpose, as well as to account for any construction activities that may involve the modification or removal of infrastructure.

Future land use after decommissioning should be assessed prior to the initiation of works, particularly if the affected land will not be used for similar purposes. Should decommissioning occur at any stage, rehabilitation of the area may be required to return the site to an acceptable condition. Decommissioning will entail the complete removal of infrastructure, including buildings, foundations, marine structures and associated support systems that are not required for the future use of the area. Any pollution present on-site must be identified, documented, and remediated in accordance with applicable environmental standards.

The impacts associated with the decommissioning phase include increased noise, dust, and waste production as structures are dismantled. These impacts are typically short-term and localised, but they must be managed effectively to avoid nuisance or environmental degradation. Noise levels must be maintained within the limits stipulated in the Health and Safety Regulations of the Labour Act and/or World Health Organization guidelines. Implementation of a waste management plan, especially for the identification and disposal of hazardous or contaminated materials, will be paramount. Waste must be securely contained and transported to licensed waste disposal sites; dumping or stockpiling in surrounding areas is not permitted. The EMP and associated waste management plan will need to be reviewed and updated at the time of full decommissioning to reflect any site changes, updated legislation, and improved mitigation approaches.

2.3 ENVIRONMENTAL MANAGEMENT SYSTEM

Namport subscribes to an environmental management system (ISO14001) that ensure ongoing incorporation of environmental constraints. At the heart of an EMS is the concept of continual improvement of environmental performance with resulting increases in operational efficiency, financial savings and reduction in environmental, health and safety risks. An effective EMS include the following elements:

- ◆ A stated environmental policy which sets the desired level of environmental performance;
- ◆ An environmental legal register;
- ◆ An institutional structure which sets out the responsibility, authority, lines of communication and resources needed to implement the EMS;
- ◆ Identification of environmental, safety and health training needs;
- ◆ An environmental program(s) stipulating environmental objectives and targets to be met, and work instructions and controls to be applied in order to achieve compliance with the environmental policy;
- ◆ Periodic (internal and external) audits and reviews of environmental performance and the effectiveness of the EMS; and
- ◆ The EMP.

To ensure Namport continues to adhere to ISO14001, the contractor must also adhere to the parameters prescribed by this EMS. It remains Namport's responsibility to ensure that all contractors operating on behalf of Namport adhere to all environmental compliance requirements.

3 CONCLUSION

The EMP should be used as an on-site reference document throughout the planning and construction phases. It must be read in conjunction with the Proponent's internal Health, Safety, Security and Environmental Management System, and all construction personnel must be trained in its contents. Any

party responsible for non-compliance with the EMP should be held accountable for implementing corrective measures, including environmental rehabilitation where required.

Monitoring requirements outlined in the EMP are critical for effective environmental performance management. Should monitoring results indicate deviations from acceptable limits, alternative methods or technologies must be considered and implemented to ensure that operations remain within regulatory and environmental thresholds.

The port expansion project will diversify and enlarge the business and industrial sector of Walvis Bay and provide much needed employment opportunities during the construction and operational phases.

Negative environmental impacts resulting from construction and operations of the port are expected, unless suitable preventative and mitigating measures are implemented. The most important of the impacts are noise, traffic, waste, pollution and health and safety.

An ECC issued based on this EMP, will render it a legally binding document which should be adhered to. It specifies some of the enhancement measures aimed at increasing the positive impacts. This include maximising the appointment of local Namibian companies as contractors and for support services. The chance find procedure must be initiated for any potentially significant archaeological or heritage finds. All infrastructure must be designed and finished to blend in with the surroundings. Construction activities must be restricted to day time. Good housekeeping must be performed at all times and equipment must be on site to deal with any emergencies such as spills, fire and injuries.