

CONTINGENCY PLAN

MARINE FUEL BUNKERING OPERATIONS OF EMONO FUEL SUPPLIES IN WALVIS BAY, ERONGO REGION



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Prepared:

By:



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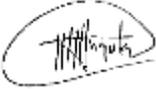
For:

Emono Fuel Supplies Cc

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DOCUMENT INFORMATION:

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1| INTRODUCTION AND BACKGROUND

Namibia's National Marine Pollution Contingency Plan (NMPCP) as approved in 2017, requires companies to develop a Marine Spill Contingency plan as part of its commitment to protecting our valuable coastal and marine resources from the threat of marine pollution incidents. In accordance with the NMPCP, Emono Fuel Supplies CC has developed the Contingency Plan for its fuel bunkering operations at Walvis Bay. This plan is integrated with the Environmental Management Plan (EMP) and include specific procedures for rapid shutdown and emergency response in the event of an incident.

1.2 OBJECTIVES OF THE PLAN

The primary objective of a contingency plan for fuel bunkering operations, specifically for truck-to-ship transfers, is to prevent or minimize, and effectively manage, emergencies such as oil spills and fires, thereby protecting human life, the environment, and property. Given that truck-to-ship (TTS) bunkering involves the transfer of hazardous substances in a public port area, the plan ensures a rapid, coordinated response to emergencies to avoid escalation.

Key objectives of the contingency plan include:

- **Minimizing Environmental Impact:** To prevent, contain, and clean up spills of fuel and oil to the marine ecosystem, especially as bunkering is a high-risk activity for spills.
- **Safety of Personnel:** To prevent injury or loss of life among crew members and dock personnel through clear emergency shutdown procedures, evacuation protocols, and immediate elimination of ignition sources.
- **Infrastructure and Asset Protection:** To protect the receiving vessel, the delivery truck, and port infrastructure from damage.
- **Ensuring Rapid Response:** To facilitate immediate action, such as shutting down pumps, closing valves, and deploying on-site spill kits (absorbent pads, booms) to contain fuel leaks.
- **Regulatory Compliance:** To comply with national and international environmental regulations.
- **Effective Communication:** To maintain communication channels between the truck driver, ship's crew, and port authorities, ensuring rapid reporting of any incident.

2| LOCALITY

The project site (22.936987°S; 14.508895°E) is situated on Erf 4662, Ben Amathila Avenue, in the fishing harbor of Walvis Bay. See Figure 1.

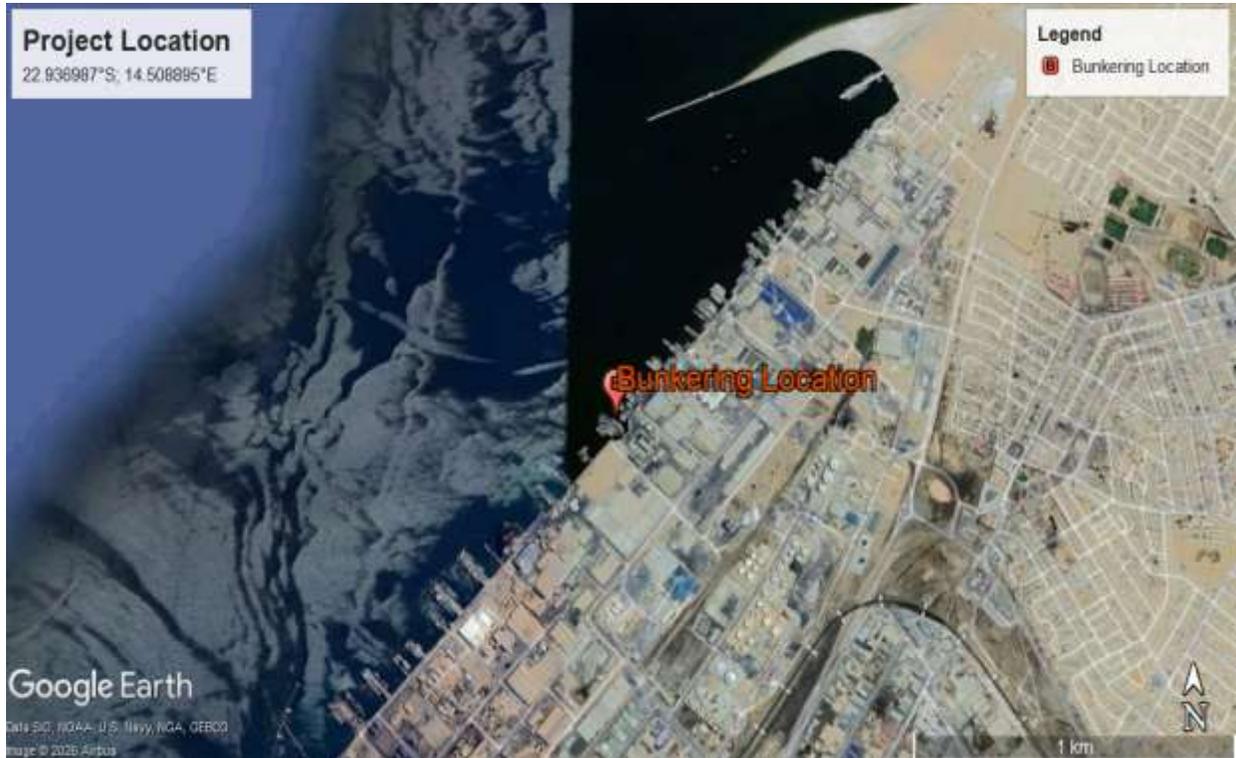


Figure 1. Project locality map



Figure 2. Layout map of site

3| ROLES AND RESPONSIBILITIES

During the operational phase, the proponent shall provide resources essential to the implementation and control of the Contingency Plan, including human resources, technology, and financial resources. The general roles and responsibilities of various parties during operations of the site are outlined below.

Role	Responsibilities
Emono Fuel Supplies CC (Proponent)	Overall responsibility for the operation; ensures the shipboard team follows this plan; notifies port/authorities if required; completes the fuel transfer safety checklist.
Engineering Officer	Technical supervisor of the bunkering; monitors tank levels and pressures; leads the engine room response team.
Deck Watch Officer / Manifold Watch	Constant attendance at the manifold; monitors hose and connection; operates the emergency shutdown; first responder on deck.
Truck Driver	Accompanies the truck at all times; controls the discharge flow from the truck; responsible for truck-mounted spill kit; completes the fuel transfer safety checklist.
Marine Representative (where necessary)	Assists the driver; controls the nozzle on the vessel; relays messages if direct communication is poor.
Collaborative Stakeholders:	<ul style="list-style-type: none"> ▪ Namport: Provides operational support, monitors port activities, and ensures compliance with port safety regulations. Directs maritime emergency response and vessel control. ▪ Ministry of Environment, Forestry, and Tourism: Oversees environmental compliance and provides guidance on ecological impact mitigation. ▪ Ministry of Mines and Energy: Approves bunkering licenses and ensures adherence to national energy policies.

4| PRE-BUNKERING PREPARATIONS

Before any fuel transfer begins, the following safety checks must be completed and documented using the Fuel Transfer Safety Checklist in Appendix A.

- **Secure Positioning:** The tank truck must be safely and securely located on stable ground with the parking brake set and wheels chocked to prevent movement. The vessel must be properly moored and secured alongside the berth.
- **Communication:** A reliable and agreed-upon communication method must be established between the truck driver and the vessel's manifold watch. This must be tested before flow starts. Intrinsically safe two-way radios or pre-agreed hand signals/VHF must be adopted. If communication fails, the operation must stop immediately.
- **Hose Inspection:** The transfer hose must be visually inspected along its entire length by both the driver and the vessel's representative. Look for signs of wear, kinks, abrasion, bulges, or "vacuum pinch." Do not rely solely on a test date stenciled on the hose.
- **Containment Measures:**
 - All vessel deck scuppers and drain holes must be effectively plugged.
 - A drip tray of adequate size must be placed under the manifold connection to catch minor drips.
 - Lightweight plastic sheeting may be rigged under the suspended hose to deflect any spray or leakage overboard.
- **Spill Equipment Staged:** The vessel's "Oil Pollution Emergency Plan" equipment must be ready for immediate use at the manifold area. This includes absorbent pads, booms, sawdust, and non-sparking scoops. The truck's own spill kit must also be accessible.
- **Fire Safety:** Portable foam-type fire extinguishers must be positioned at the manifold, and fire hoses with nozzles should be ready for immediate use.
- **Operational Agreement:** The maximum pumping rate and topping-off rate must be agreed upon. Tanks on the vessel must have sufficient ullage, accounting for thermal expansion (no more than 95% full) and the line fill from the hose.

5| SPILL RESPONSE PROCEDURES

The ecological impact of oil, fuel, chemical or hazardous substance spill can be minimised by good management and planning, as well as the response actions put into effect by the proponent and responsible authority. Such actions will largely depend on several factors;

- The type of oil, fuel or chemical(s) involved;
- The size of the spill;
- The location of the spill;
- Prevailing sea and weather conditions at the spill site;
- The environmental sensitivity of the coastline/site impacted.

In commanding the response to the spill, the proponent should ensure that defensive actions should begin as soon as possible to prevent, minimise or mitigate the threat to the environment or public health from the pollution.

Before any fuel transfer begins, the following safety checks must be completed and documented using the Fuel Transfer Safety Checklist.

5.1 SPILL RESPONSE (THE "STOP, ALERT, CONTAIN" PRINCIPLE)

- i. **Stop Transfer:** The person who sees the spill must immediately shout "Shut Down" and signal the truck driver and vessel team to cease pumping. Activate the emergency shut-down system immediately.
- ii. **Raise Alarm:** Immediately inform the bridge, engine room, and the truck driver. Initiate the ship's internal emergency alarm.
- iii. **Mobilize Response Team:** The crew and driver muster as per their roles. The proponent takes command of the incident.

5.2 SPILL CONTAINED ON VESSEL'S DECK

- i. **Secure Scuppers:** Double-check that all scuppers are securely plugged to prevent oil from escaping overboard.
- ii. **Deploy Absorbents:** Use absorbent pads and booms from the vessel's "Oil Pollution Emergency Plan" kit to surround and soak up the spilled fuel. Spread sawdust over the area.
- iii. **Protect the Scupper Seal:** Place sawdust or absorbent material over the scupper plugs to create an additional barrier.

- iv. **Collect Spilled Oil:** Use non-sparking tools and scoops to place contaminated material and recovered oil into designated 200-litre storage drums or heavy-duty plastic waste bags.

5.3 SPILL CONTAINMENT TO WATER

- i. **Deploy Booms:** If the spill reaches the water, deploy containment booms around the vessel and the spill area to limit its spread, if safe and practicable to do so.
- ii. **Do Not Use Dispersants Without Approval:** Never use oil spill dispersant chemicals without the express permission of the port authority.
- iii. **Monitor Spill:** Observe wind, tide, and current conditions to predict the spill's movement.

5.4 NOTIFICATION AND REPORTING

- i. **Internal:** Master informs the ship's management and owner.
- ii. **External:** The proponent is responsible for immediately notifying the relevant authorities. This typically includes:
 - Port Control / Marine Safety Control Centre.
 - Local environmental agency (e.g., Coast Guard).
 - The terminal/facility operator.
- iii. **Information to Provide:** Time, location, type of fuel, estimated quantity spilled, source of spill, and current containment actions.

6| DOCUMENTATION AND POST-INCIDENT ACTIONS

- i. **Log the Incident:** The bridge must maintain a detailed, minute-by-minute log of all actions, communications, and notifications in the Deck Log Book and Oil Record Book. The engine room must log relevant actions in the Engine Log Book.
- ii. **Preserve Evidence:** Take photographs and videos of the spill area, the containment efforts, and the equipment involved. Collect and secure oil samples from the spill source and surrounding areas.
- iii. **Incident Report:** The proponent must complete an incident report form, detailing the cause and the response. Post-incident tank soundings must be recorded and compared with pre-bunkering figures.
- iv. **Debrief and Corrective Action:** After the situation is resolved, hold a debriefing session with all involved personnel (crew and driver) to discuss the effectiveness of the response, identify root causes, and determine corrective actions to prevent recurrence.

7| TRAINING AND DRILLS

- i. Regular drills must be conducted to practice this plan. These drills should involve both the ship's crew and, where possible, simulate coordination with the truck driver.
- ii. Drills should include deploying equipment, practicing communication procedures, and executing the emergency shutdown.
- iii. All personnel must be instructed on the dangers of static electricity, the importance of proper bonding/grounding, and the risks of "line shock" when stopping flow suddenly.

8| EQUIPMENT REQUIRED

The following equipment must be readily available at the bunkering station before any transfer:

- i. Deck scupper plugs (confirmed in place)
- ii. Drip tray
- iii. The vessel's "Oil Pollution Emergency Response" kit containing:
 - Absorbent booms and pads
 - Sawdust or absorbent granules
 - Non-sparking shovel and scoops
 - Heavy-duty plastic bags and empty drums
- i. Portable foam fire extinguishers (at least two)
- ii. Fire hose with nozzle, rigged and ready
- iii. Intrinsically safe two-way radios (if used)
- iv. Personal Protective Equipment (PPE) for all responders (gloves, goggles, protective suits)

7| CONCLUSION

The effectiveness of this plan relies not merely on its existence, but on its implementation. It is a living document that requires the full commitment of all parties involved. Regular training drills, rigorous safety briefings, and post-operation reviews are essential to ensure that all team members are prepared to act decisively and correctly under pressure.

Ultimately, the successful execution of this Contingency Plan will minimize environmental risk, protect assets, and maintain the high safety standards required for marine fuel transfer operations. All personnel

are expected to familiarize themselves with this plan and to foster a culture of safety and vigilance during every truck-to-ship bunkering evolution.

Appendix A: Fuel Transfer Safety Checklist (Truck-to-Ship)

This checklist is to be completed and signed by both the Truck Driver and the Vessel's Representative before any fuel transfer begins.

Item	Check
Pre-Transfer Checks	
1. Truck parking brake applied and wheels chocked.	<input type="checkbox"/>
2. Vessel securely moored.	<input type="checkbox"/>
3. Communication method agreed and tested (e.g., VHF Channel __ / Hand Signals).	<input type="checkbox"/>
4. Transfer hose visually inspected and in good condition.	<input type="checkbox"/>
5. All deck scuppers effectively plugged.	<input type="checkbox"/>
6. Drip tray in place under manifold.	<input type="checkbox"/>
7. Spill containment equipment (SOPEP/Truck kit) at the ready.	<input type="checkbox"/>
8. Portable fire extinguishers in place and ready.	<input type="checkbox"/>
9. Tank to be filled identified and ullage confirmed.	<input type="checkbox"/>

Item	Check
10. Maximum pumping rate and topping-off rate agreed.	<input type="checkbox"/>
11. Emergency shutdown procedure agreed.	<input type="checkbox"/>
During / Post-Transfer	
12. Constant watch maintained at manifold and truck controls.	<input type="checkbox"/>
13. Flow rate reduced for topping off.	<input type="checkbox"/>
14. Hose drained properly before disconnection, with no drips.	<input type="checkbox"/>