Updated Environmental Management Plan (EMP):

Operations of the existing Ohakane Service Station in Opuwo, Kunene Region.

Prepared by:	Prepared for:
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March 2026

DOCUMENT INFORMATION

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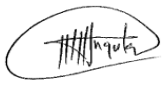
Report status	Final
Signature:	

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Abbreviation	Meaning
CV	Curriculum Vitae
DEAF	Department of Environmental Affairs and Forestry
EA	Environmental Assessment
EAP	Environmental Assessment Practitioner
ECC	Environmental Clearance Certificate
EDS	Excel Dynamic Solutions
EMA	Environmental Management Act
EMP	Environmental Management Plan
GN	Government Notice
I&APs	Interested and Affected Parties
KPI	Key Performance Indicator
MEFT	Ministry of Environment, Forestry and Tourism
NHC	National Heritage Council
PPE	Personal Protective Equipment
PRO	Public Relations Officer
IFC	International Finance Corporation
SANS	South African National Standards
SHE	Safety, Health and Environmental (Officer)
ULP	Unleaded Petrol
UNCCD	United Nations Convention to Combat Desertification

1. INTRODUCTION

1.1. Project Background

Ohakane Service Station (the Proponent) operates an existing fuel retail service station situated within Opuwo townlands, Kunene Region, Namibia. The service station has been operating under Environmental Clearance Certificate (ECC-02191). In accordance with the Environmental Management Act (No. 7 of 2007) and the Environmental Impact Assessment Regulations (Government Notice No. 30 of 2012), Excel Dynamic Solutions (Pty) Ltd (EDS) was appointed to facilitate an application for the renewal of the ECC on behalf of the Proponent.

The storage, installation, and handling of hydrocarbons (fuels) are listed activities under the EIA Regulations (2012) of the Environmental Management Act (2007). These activities may not be undertaken without a valid Environmental Clearance Certificate. The following listed activities apply to this service station:

Hazardous Substance Treatment, Handling and Storage:

- 9.2 Any process or activity which requires a permit, license or other form of authorisation, or the modification of or changes to existing facilities for any process or activity in terms of a law governing the generation or release of emissions, pollution, effluent or waste.
- 9.4 The storage and handling of 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.

This document has been prepared as a legal requirement to support the application for renewal of the current ECC. The Updated EMP will be submitted to the DEAF in the MEFT for evaluation and potential ECC renewal consideration.

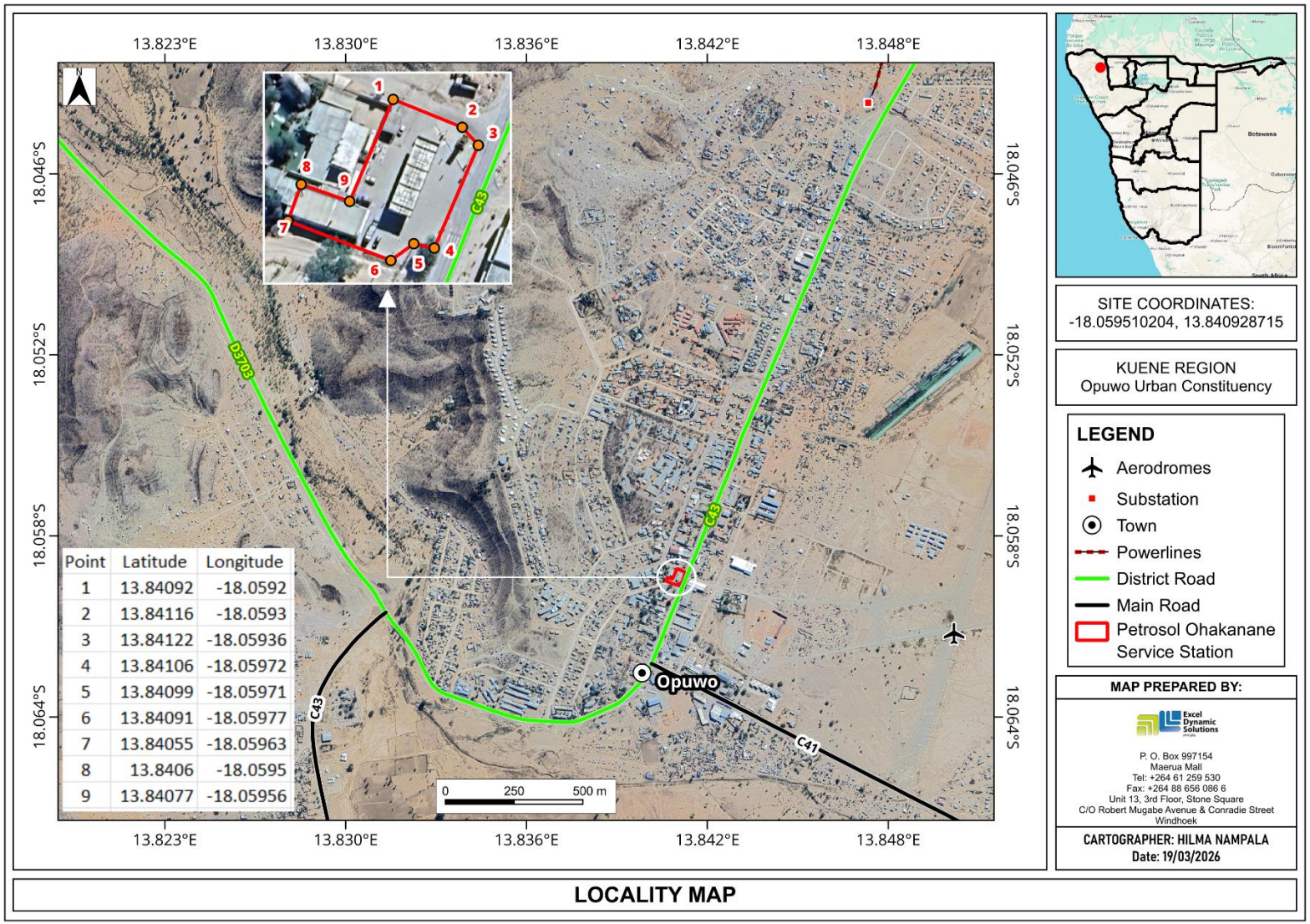

Figure 1: Locality map for Ohakane service station.

1.2. Project description

The Existing Ohakane Service Station is situated coordinates (-18.0595,13.8409) within Opuwo townlands, Kunene Region. The locality of the service station is in close proximity to the C43 road network in Opuwo. The site layout and infrastructure are described below.

1.2.1 Site Layout and Infrastructure

The site footprint is roughly 2300 m² and includes essential infrastructure such as a retail shop, catering area, and ablution facilities. Fuelling services are distributed across four main pump islands under a partial canopy, supplemented by an independent COC island equipped with a secondary mini-canopy. The underground infrastructure at the site consists of three (3) underground storage tanks:

- 2 x Tank — 46 m³ Unleaded Petrol (ULP)
- 1 x Tank — 23 m³ Diesel (50 ppm)

Figure 2: Underground storage tanks at Ohakane service station.

Accidental fuel releases are managed via onsite spill control measures and a three-chamber oil water separator. This system serves as a critical barrier to prevent hydrocarbons from infiltrating the surrounding substrate or the water table.

1.2.2 Staffing and Operating Hours

The service station operates on a daily basis, including weekends and public holidays. Staff includes but not limited to pump attendants, cooks, cashiers, a site manager, and security

personnel. All staff are required to undergo induction training that includes EMP provisions, fire safety, and hazardous substance handling procedures.

1.2.3 Utilities and Services

The site is connected to the municipal water supply network, municipal sewer system for ablution facilities, and the national electricity grid. Waste is collected and disposed of to the approved municipal landfill.

1.3. Aim of the updated Environmental Management Plan (EMP)

Regulation 8(j) of the EIA Regulations (2012) requires that a draft Environmental Management Plan (EMP) shall be included as part of the Environmental Assessment (EA). A '**Management Plan**' is defined as:

> *"…a plan that describes how activities that may have significant environmental effects on the environment are to be mitigated, controlled and monitored."*

An EMP is one of the most important outputs of the EA process. Synthesizes all the proposed mitigation and monitoring actions, set with specific assigned responsibilities. Additionally, it provides a link between the impacts identified in the EA process and the required mitigation measures. It is important to note that an EMP is a statutory document, and a person who contravenes the provisions of this EMP may face imprisonment and/or a fine. This EMP is a living document and can be amended to address project changes/or environmental conditions, and feedback from compliance monitoring.

The purpose of this document is, therefore, to guide environmental management throughout the different phases of the project activities:

- **Operation phase**- Fuelling and equipment during operation phase
- **Maintenance and closure phase**- Ceasing operation and restoring the site to its natural state, ensuring mitigation measure are effectively through monitoring.

2. LEGAL OBLIGATIONS GOVERNING THE PROPOSED ACTIVITIES.

2.1. Applicable National Legislation

The main legal framework presented herein is that of Namibia for the relevant project component under the scope of this document. Detailed legislation applicable to the project is outlined in the EA Report.

The legal requirements provided herein pertain to permits or licenses required of the Proponent and/or the renewal of such permits throughout the operational phase. These legal requirements are provided under **Table 1**.

Table 1: Applicable legal requirements and permits for the activities

Legislation/Policy/ Guideline	Relevant Provisions	Implications for this project
Environmental Management Act EMA (No 7 of 2007)	Requires that projects with significant environmental impacts be subject to an environmental assessment process (Section 27). Details principles which are to guide all EIAs.	An ECC must be renewed every 3 years before its expiry date.
Environmental Impact Assessment (EIA) Regulations GN 28-30 (GG 4878)	Details requirements for public consultation within a given environmental assessment process (GN 30 S21). Details the requirements for what should be included in a Scoping Report (GN 30 S8) and an Assessment Report (GN 30 S15).	

Legislation/Policy/ Guideline	Relevant Provisions	Implications for this project
Petroleum Products and Energy Act (No. 13 of 1990) Regulations (2001)	Regulation 3(2)(b) states that "No person shall possess or store any fuel except under authority of a license or a certificate, excluding a person who possesses or stores such fuel in a quantity of 600 litres or less in any container kept at a place outside a local authority area".	If there is fuel stored or is intended to be stored on site, the relevant petroleum products storage licenses/permits should be obtained from the Petroleum Affairs at the Ministry of Mines and Energy.
Labour Act 11 of 2007 Health and Safety Regulations (HSR) GN 156/1997 (GG 1617).	Adhere to all applicable provisions of the Labour Act and the Health and Safety regulations.	The protection of employees and contractors' labour rights and occupational health safety.
Forestry Act 12 of 2001, Amended Act 13 of 2005	Prohibits the removal of any vegetation within 100 m from a watercourse (Forestry Act S22 (1)). The Act prohibits the removal of and transportation of various protected plant species.	Should there be protected plant species, known to occur within the project boundaries, a Permit should be obtained from the nearest Forestry Office (MEFT) before removal.

Legislation/Policy/ Guideline	Relevant Provisions	Implications for this project
National Heritage Act (Act No. 27 of 2004)	The Act provides for the protection and conservation of places and objects of heritage significance, as well as the registration of such places and objects. Part V, Section 46 of the Act prohibits the removal, damage, alteration, or excavation of heritage sites or remains. Section 48 sets out the procedure for the application and granting of permits, such as those required in the event of damage to a protected site occurring as an inevitable result of development. Part VI. Section 55, Paragraphs 3 and 4 require that any person who discovers an archaeological site should notify the National Heritage Council. Section 51 (3) sets out the requirements for impact assessment. Should any objects of heritage significance be identified during the site clearing and excavations, the work must cease immediately in the affected sites, and the necessary steps must be taken to seek authorization from the Council.	If archaeologically or heritage significant sites are discovered on the site, such must be reported to the National Heritage Council of Namibia for the management of such discoveries.
The National Monuments Act No. 28 of 1969	The Act enables the proclamation of national monuments and protects archaeological sites.	

Legislation/Policy/ Guideline	Relevant Provisions	Implications for this project
Soil Conversation Act No. 78 of 1969	The Act was established to consolidate and amend the law relating to the combating and prevention of soil erosion, the conservation, improvement, and manner of use of soil and vegetation, and the protection of water sources.	Soils should be conserved and measures to prevent or minimise erosion and pollution during operations should be implemented.
Public Health Act No. 36 of 1919	Section 119 states that "no person shall cause a nuisance or shall suffer to exist on any land or premises owned or occupied by him or which he is in charge any nuisance or other condition liable to be injurious or dangerous to health."	The Proponent must ensure compliance with the provisions of these legal instruments.
Health and Safety Regulations GN 156/1997 (GG 1617)	Details various requirements regarding the health and safety of labourers.	
Public and Environmental Health Act No. 1 of 2015	To provide a framework for a structured, uniform public and environmental health system in Namibia, and to provide for incidental matters.	

2.2. APPLICABLE INTERNATIONAL STANDARDS, TREATIES, CONVENTIONS AND POLICIES.

The applicable international standards, treaties, conventions and policies for the project are listed in **Table 2** below.

Table 2: International Policies, Principles, Standards, Treaties and Conventions applicable to the project

Statute	Provisions	Project Implications
Equator Principles	A financial industry benchmark for determining, assessing, and managing environmental and social risk in projects (August 2013). The Equator Principles have been developed in conjunction	These principles are an attempt to: '…encourage the development of socially responsible projects, which

Statute	Provisions	Project Implications
	with the International Finance Corporation (IFC) to establish an International Standard with which companies must comply to apply for approved funding by Equator Principles Financial Institutions (EPFIs). The principles apply to all new project financings globally across all sectors. Principle 1: Review and Categorisation Principle 2: Environmental and Social Assessment Principle 3: Applicable Environmental and Social Standards Principle 4: Environmental and Social Management System and Equator Principles Action Plan Principle 5: Stakeholder Engagement Principle 6: Grievance Mechanism Principle 7: Independent Review Principle 8: Covenants Principle 9: Independent Monitoring and Reporting Principle 10: Reporting and Transparency	subscribe to appropriately responsible environmental management practices with a minimum negative impact on project-affected ecosystems and community-based upliftment and empowering interactions.'
The International Finance Corporation (IFC) Performance Standards	The International Finance Corporation's (IFC) Sustainability Framework articulates the Corporation's strategic commitment to sustainable development and is an integral part of the IFC's approach to risk management. The Sustainability Framework comprises IFC's Policy and Performance Standards on Environmental and Social Sustainability, and IFC's Access to Information Policy. The Policy on Environmental and Social Sustainability outlines IFC's commitments, roles, and responsibilities in relation to environmental and social sustainability. As of 28 October 2018, there are ten (10) Performance Standards (Performance Standards	The Performance Standards are directed toward clients, guiding how to identify risks and impacts, and are designed to help avoid, mitigate, and manage risks and impacts as a way of doing business sustainably, including stakeholder engagement and disclosure obligations of the Client (Borrower) concerning project-level activities. In the case of its direct investments (including project and corporate finance provided through

Statute	Provisions	Project Implications
	on Environmental and Social Sustainability) that the IFC requires project Proponents to meet throughout the life of an investment. These standard requirements are briefly described below. Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts Performance Standard 2: Labour and Working Conditions Performance Standard 3: Resource Efficient and Pollution Prevention and Management Performance Standard 4: Community Health and Safety Performance Standard 5: Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement Performance Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources Performance Standard 7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities Performance Standard 8: Cultural Heritage Performance Standard 9: Financial Intermediaries (FIs) Performance Standard 10: Stakeholder Engagement and Information A full description of the IFC Standards can be obtained from http://www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-standards?cq_ck=1522164538151#ess1	financial intermediaries), IFC requires its clients to apply the Performance Standards to manage environmental and social risks and impacts so that development opportunities are enhanced. IFC utilises the Sustainability Framework, along with other strategies, policies, and initiatives, to guide the business activities of the Corporation in achieving its overall development objectives.

Statute	Provisions	Project Implications
The United Nations Convention to Combat Desertification (UNCCD) 1992	Addresses land degradation in arid regions to contribute to the conservation and sustainable use of biodiversity, as well as mitigating climate change. The objective of the convention is to forge a global partnership to reverse and prevent desertification/land degradation, and to mitigate the effects of drought in affected areas, thereby supporting poverty reduction and environmental sustainability. United Nations Convention.	The project activities should not contribute to desertification.
Convention on Biological Diversity 1992	Regulate or manage biological resources important for conserving biological diversity, whether within or outside protected areas, to ensure their conservation and sustainable use. Promote the protection of ecosystems and natural habitats, as well as the maintenance of viable populations of species in their natural surroundings.	Removal of vegetation cover and destruction of natural habitats should be avoided, and where not possible, minimised.
Stockholm Declaration on the Human Environment, Stockholm (1972)	It recognizes the need for: “a common outlook and common principles to inspire and guide the people of the world in the preservation and enhancement of the human environment.	Protection of natural resources and prevention of any form of pollution.

3. EMP IMPLEMENTATION, ROLES AND RESPONSIBILITIES

The Proponent is ultimately responsible for implementing the EMP. However, the Proponent may delegate this responsibility at any time, as they deem necessary during the project phases. The roles and responsibilities of all delegates/parties involved in the effective implementation of this EMP are set out in **Table 3** Below:

Table 3: The persons and institutions responsible for the Implementation of the Draft EMP.

Role (Person and or Institution)	Responsibilities
Ohakane Service Station (The Proponent)	-Managing the implementation of this EMP, updating and maintaining it when necessary. -Management and monitoring of individuals and/ or equipment on-site in terms of compliance with this EMP and issuing fines for contravening EMP provisions. -Ensuring all required licenses, permits and certificates are current and valid. -Submitting ECC renewal applications to DEAF/MEFT timeously.
Site Manager	This individual will be responsible for ensuring that the project's operational activities are completed on time. The Manager's duties and responsibilities will include: -Ensure that relevant commitments contained in the EMP Action Plans are adhered to. -Ensure relevant staff are trained in procedures entailed in their duties. -Maintain records of all relevant environmental documentation for the project. -Reviewing the EMP annually and amending the document when necessary. -Issuing fines to individuals who may be in breach of the EMP provisions and, if necessary, removing such individuals from the site. -Cooperate with all relevant interested and affected parties/stakeholders. -Development and management of schedules for daily activities
Environmental Control Officer (ECO) or Safety, Health & Environmental (SHE) Officer	The SHE or ECO (as appropriate) is responsible for ensuring that project activities are completed on time, efficiently and sustainably. The ECO/SHE Officer's duties and responsibilities include: -Management and facilitation of communication between the Proponent, PR and Interested and Affected Parties (I&APs) regarding this EMP. -Conducting site inspections of all areas with respect to the implementation of this EMP (monitor and audit the implementation of the EMP). -Advising the Proponent Site Manager on the removal of person(s) and/or equipment not complying with the provisions of this EMP. -Making recommendations to the PR with respect to the issuing of fines for contraventions of the EMP.

Role (Person and or Institution)	Responsibilities
	-Undertaking an annual review of the EMP and recommending additions and/or changes to this document.
Public Relations Officer (PRO)	The PRO will be responsible for the following tasks: -Liaising between the affected landowners, communities and the Proponent. -Ensure effective communication with stakeholders, local communities, media (if necessary) and the public. -Organising and overseeing public relations activities, managing public relations issues. -Preparing and submitting public relations reports, if required. -Collaborating with personnel and maintaining project-related open communication among personnel.
Other responsibilities include Archaeology: Chance Finds Procedure (CFP) Implementation Roles	A. Operator: Exercise due caution if archaeological remains are found B. Site Manager and ECO: Secure the site and advise management timeously C. Archaeologist: Inspect, identify, advise management, and recover remains.

4. ENVIRONMENTAL MANAGEMENT ACTION PLANS

4.1. Key Potential Negative Impacts

The potential impacts anticipated for the operations onsite are listed below. Mitigation measures or management action plans were also made for the negative impacts to maximize the positive ones. The impacts that had been identified and managed on site are as follows.

Positive impacts:

- Maintained job opportunities
- Uninterrupted supply of fuel to retailing facilities and other consumers
- Regulatory Compliance and Risk Reduction

Negative impacts:

- Risk of fire (accidental fire outbreaks)
- Waste generation
- Dust generation
- Air quality and emissions
- Noise impacts
- Soil and water resources contamination
- Impact on Fauna and Flora
- Visual impact
- Vehicular impact
- Health, safety and security
- Grievances
- Heritage impact

5. The Updated Management and Mitigation of Potential Key Negative Impacts.

The mitigation measures and the responsible parties during operational phase in this EMP are set out in **Table 4** Below:

Table 4: Environmental and Mitigation Measures for the operational phase

Aspect	nature	Management and Mitigation Measure(s)	Responsible Person	Key Performance Indicator (KPI)
Emp and training implementation	EMP required licenses, agreements and permits	-Ensure that the contents of the EMP are understood by the contractor, subcontractors, employees, and all personnel who will be present on site. -Apply for the necessary permits or licenses from the various authorities or ministries that govern the operations of the project. -Conduct induction training for all new staff before commencing work.	- Proponent	-All contracts, permits, certificates and other legal documents must be obtained.
Fires	Outbreak of accidental fires	-The holistic fire protection and prevention plan should still be utilized onsite. -Experience has shown that the best chance to put out a major fire rapidly is in the first 5 minutes. It is essential to recognize that a responsive fire prevention plan encompasses not only the availability of firefighting equipment, but more importantly, it involves proactive measures and activities to prevent, mitigate, and avoid conditions that may lead to fires. - Site must be equipped with sufficient firefighting resources including fire extinguishers, sand buckets and fire hoses.	- Proponent, -SHE/ECO,	-Any incidents reported are recorded together with the steps taken to mitigate the impacts. -Fire extinguisher serviced as recommended by the manufacturer.

Aspect	nature	Management and Mitigation Measure(s)	Responsible Person	Key Performance Indicator (KPI)
		- Regular surveys (monthly) of all firefighting equipment must be carried out. - All staff must be trained on fire evacuation procedures and fire extinguisher use. - No smoking within 10 m of fuel dispensing areas. - Emergency contact numbers (Fire Brigade, Police) displayed prominently on site.		
Waste generation	-The ability of the product to act as a waste which must be cleaned up, and soil that has been polluted on site by hydrocarbons must be treated as hazardous waste.	- Waste generated on site must be sorted at source (recyclables, general, hazardous). - All waste must be disposed of at an approved landfill or licensed waste facility. - Labelled bins for different waste types must be provided and maintained on site. - Site ablution facilities must be maintained for staff and visitors. - Hydrocarbon-contaminated soils and materials must be treated as hazardous waste. - A waste disposal checklist must be maintained and updated regularly.	-SHE/ECO	- Regularly conduct waste inspections on site, -Weekly disposal of waste from the site to the appropriate landfill. -A checklist of waste disposal must be maintained on site. -Waste disposal manifests maintained. No illegal dumping incidents.

Aspect	nature	Management and Mitigation Measure(s)	Responsible Person	Key Performance Indicator (KPI)
Dust Generation	Dust generated by vehicle movements on unpaved surfaces and site activities	- All unpaved access roads and parking areas must be watered during dry and windy conditions to suppress dust. - Vehicle speeds within the site must be limited to 10 km/h. - Stockpiling of loose materials on site must be minimised and covered when not in use. - Dust complaints from neighbouring properties must be recorded and addressed promptly. - Housekeeping of the site must be maintained to prevent dust accumulation.	Site Manager, All project workers	-No dust-related complaints unresolved. -Complaint register maintained. -Dust suppression records kept.
Air Quality and Emissions	Emissions from vehicles, fuel vapours and generators	- Vehicle emissions from delivery tankers must comply with national emission standards. - Vapor recovery units must be installed and maintained on fuel dispensing equipment where applicable. - Any generator or auxiliary equipment on site must be regularly maintained to minimize emissions. - Burning of waste on site is strictly prohibited. - Fuel tanks must be inspected regularly for vapor leaks and all leaks repaired immediately. -Engine idling at the site should be discouraged.	Proponent, Site Manager, SHE/ECO	-No open burning incidents. -Equipment maintenance records kept. -Vapor recovery equipment in working order.

Aspect	**nature**	**Management and Mitigation Measure(s)**	**Responsible Person**	**Key Performance Indicator (KPI)**
Noise	Noise from vehicle movements, generators and operations affecting surrounding community	- Operating hours must be managed to minimize noise impacts on adjacent residential areas. - Generators and mechanical equipment must be maintained regularly to reduce noise emissions. - Fuel delivery activities (large tankers) should be scheduled during daytime hours (07:00 - 19:00) where possible. - Noise complaints from neighbouring properties must be recorded in the complaint register and addressed within 7 working days. - All vehicles and equipment on site must meet relevant noise emission standards. Loud music from vehicles fuelling up should be restrict and drivers asked to lower the volume.	- Site Manager	-No unresolved noise complaints. -Equipment maintenance logs up to date.
Soil and Water resources	Accidental spills of fuel and other chemicals used on-site may occur.	-Any fuel spills detected on site must be reported, and remediation action must be taken accordingly. -Any soils contaminated by hydrocarbon on site must be carefully removed, transported, and disposed of at an appropriate site. -All workers on site must be trained on how to handle soil and water waste, to reduce the impacts. -Soil pollution must be prevented on site to ensure that contaminants do not	- Site Manager - All project workers	- Reports for all hydrocarbon leaks on site are conducted by the Health and Safety Officer onsite. - Spill response reports filed. - Separator pit inspection records maintained.

Aspect	nature	Management and Mitigation Measure(s)	Responsible Person	Key Performance Indicator (KPI)
		affect the groundwater resources around the project area. - Existing tracks must be used to minimize the footprints on the already sensitive soils on site. - Soil pollution must be prevented to ensure contaminants do not affect groundwater resources. - Existing drainage and separator pit must be inspected and cleaned regularly (minimum quarterly). - Bunded storage areas must be maintained for all chemical storage. - Underground storage tanks must be inspected and tested for leaks annually. - Existing ablution facilities should be used, no public urinating. - Servicing or maintenance of vehicles onsite should not be conducted onsite.		
Fauna and Flora	Impact on indigenous vegetation and wildlife from site operations and hydrocarbon contamination	- Vegetation disturbance must be limited to the operational footprint of the site. - Any removal of protected plant species requires a permit from the nearest Forestry Office (MEFT). - Hydrocarbon spills must be contained and remediated immediately to prevent	-Site Manager, SHE/ECO	-No unauthorized vegetation clearing. -No wildlife disturbance incidents. -Spill containment records maintained.

Aspect	nature	Management and Mitigation Measure(s)	Responsible Person	Key Performance Indicator (KPI)
		contamination of soil and vegetation outside the site boundary. - No illegal dumping of waste in surrounding natural areas. - Any wildlife observed on site must be reported to MEFT and must not be harmed or disturbed.		
Visual Impact	This has an impact on the aesthetic appearance of the site.	- The site must be kept tidy and free of litter and waste at all times. - Signage must be maintained in good condition and comply with relevant by-laws. - Night lighting must be directed to minimise light spill onto adjacent properties. - Infrastructure must be maintained in good condition and painted/repaired as required.	- Site Manager - All project workers	-A Compliant register must be kept on site. -Regular site inspections conducted. -No unresolved complaints.
Heritage Impact	-Archaeological significance might be discovered on site.	- If any archaeological significance is discovered on site, work must cease immediately in the affected area. - Discoveries must be reported to the National Heritage Council of Namibia. - The Chance Finds Procedure (Appendix B) must be followed at all times. - The Site Manager must be trained on the importance of heritage significance	-Site Manager	-A register book for any possible discovery must be present on site.

Aspect	nature	Management and Mitigation Measure(s)	Responsible Person	Key Performance Indicator (KPI)
		and the reporting obligations under the National Heritage Act. - A heritage discovery register must be maintained on site.		
Health, Safety and Security	Handling machines or equipment can cause injuries.	- No unauthorized people should be allowed on the operational forecourt area. - All workers must be provided with appropriate PPE (safety footwear, hi-vis vests, gloves, eye protection as applicable). - A Health and Safety Management System must be implemented and maintained on site. - Appropriate safety signage and warnings must be erected in all relevant areas on site. - A first aid kit must be available on site at all times and maintained in good condition. - Regular toolbox talks (minimum monthly) must be conducted with all staff. - All incidents and near misses must be reported and recorded in the incident register.	- SHE/ECO -Site Manager	- A health, safety and security register must be kept on site to record any near misses, accidents, and incidents that have occurred on site. -H&S register maintained. Incident register kept. PPE compliance verified. -Monthly toolbox talk records.

Aspect	nature	Management and Mitigation Measure(s)	Responsible Person	Key Performance Indicator (KPI)
		-Prevent illegal access to the work sites, by implementing appropriate security measures. These security measures must not pose a threat to persons or motorists frequenting the site.		
Vehicular impacts	The site is located within the Opuwo townlands, which leads; project vehicles might have an impact on the traffic on the main road.	- All project drivers must hold a valid driver's license for the class of vehicle operated. - No person under the influence of alcohol or drugs will be allowed to operate any project vehicle. - No person with a serious health condition affecting driving ability will be allowed to drive. - A proper traffic management plan must be in place and adhered to. - Fuel delivery tankers must not obstruct public roads or pedestrian access during offloading. - Speed limit signs must be visible and adhered to within the site.	Site Manager	-Any complaint received regarding traffic issues should be recorded and action must be taken accordingly according to the complaint.
Grievances	Possible grievances from the surrounding community regarding project implementation	- A grievance register must be kept on site and all meeting minutes must be recorded and archived. - Communication regarding project progress and maintenance should be provided to affected parties timeously.	Site Manager, PRO	-Grievance registers on site. -All grievances resolved and recorded. -No outstanding unresolved grievances.

Aspect	nature	Management and Mitigation Measure(s)	Responsible Person	Key Performance Indicator (KPI)
		- All grievances must be resolved within 7 working days of receipt. - Unresolved grievances must be escalated to the Proponent or relevant authority.		

Table 5: Environmental and Mitigation Measures for the Maintenance and Closure Phase.

Aspect	Nature	Management and Mitigation Measure(s)	Responsible Person	Key Performance Indicator (KPI)
UST Inspection and Leak Testing	Potential fuel leaks from underground storage tanks causing soil and groundwater contamination	- All USTs shall be inspected and leak-tested annually by a qualified technician. - Automatic Tank Gauging (ATG) or equivalent leak detection shall be maintained in working order at all times. - Any anomaly detected shall be investigated and remediated immediately. - Leak test certificates shall be retained on site and submitted to MEFT on request.	Proponent / Site Manager	- Annual UST leak test certificate current and on file. - Zero unresolved UST leak incidents. - ATG system operational at all times.
Separator Pit and Drainage Maintenance	Build-up of hydrocarbons and sludge in separator pit leading to potential overflow and environmental contamination	- The separator pit shall be inspected and cleaned on a minimum quarterly basis. - Accumulated hydrocarbons and sludge shall be removed by a licensed waste contractor and disposed of at an approved facility. - Forecourt drainage channels shall be maintained free of blockages and structural damage. - All maintenance records shall be kept on file.	Site Manager / SHE Officer	- Separator pit cleaning records maintained (minimum quarterly). - Waste disposal manifests on file for all pit cleanings. - No overflow or drainage failure incidents recorded.

Aspect	Nature	Management and Mitigation Measure(s)	Responsible Person	Key Performance Indicator (KPI)
Fire Safety and Mechanical Equipment	Risk of fire or explosion due to poorly maintained fire suppression and fuel dispensing equipment	- All fire extinguishers shall be inspected monthly and serviced annually by an accredited fire service provider. - Valid service certificates shall be kept on site at all times. - Dispensing pumps and vapour recovery equipment shall be serviced per manufacturer specifications. - All service and calibration records shall be maintained in the site environmental file.	Site Manager / SHE Officer	- Fire extinguisher service certificates current and on file. - Monthly inspection records completed with no outstanding defects. - Pump and vapor recovery service logs up to date.
Spill Kit and Containment Infrastructure	Risk of inadequate spill response due to depleted or damaged spill containment equipment and infrastructure	- Spill kits shall be inspected monthly and replenished after each use. - Spill kit locations shall be clearly marked and known to all site staff. - Containment berms, forecourt paving, and tank pit liners shall be visually inspected monthly for cracks and deterioration. - Defects shall be repaired without delay.	SHE Officer / Site Manager	- Monthly spill kit inspection records maintained. - No unrepaired containment defects outstanding at any time. - Spill response records on file for all incidents.
Waste Management (Operational Maintenance)	Generation of hazardous waste (used oils, contaminated absorbents, chemical	- All hazardous waste generated during maintenance shall be segregated, labelled, and stored in a bunded area pending collection.	Site Manager / Waste Contractor	- Waste disposal manifests on file for all hazardous waste streams. - No unauthorised waste disposal incidents.

Aspect	Nature	Management and Mitigation Measure(s)	Responsible Person	Key Performance Indicator (KPI)
	containers) during routine maintenance activities	- Waste shall be collected and disposed of by a licensed waste contractor at an approved facility. - Waste disposal manifests shall be retained for a minimum of five (5) years. - No burning of waste shall be permitted on site.		- No open burning of waste on site.
UST Decommissioning (Closure)	Risk of residual hydrocarbon contamination and vapor hazards during removal or abandonment of underground storage tanks at closure	- All fuel product shall be removed from the USTs prior to decommissioning. - Tanks shall be cleaned, purged of vapours, and either physically removed or filled in-situ with inert material (concrete slurry or compacted sand) in accordance with applicable SANS standards and MEFT requirements. - All removed tanks, pipework, and contaminated materials shall be disposed of at a licensed hazardous waste facility. - Waste disposal manifests shall be retained for a minimum of five (5) years.	Proponent / Qualified Contractor	- Formal written closure notification submitted to MEFT at least 60 days before cessation. - UST decommissioning certificate issued by qualified contractor. - Waste disposal manifests on file for all decommissioning waste. - Zero uncontrolled releases during decommissioning.
Soil and Groundwater Assessment (Closure)	Potential residual hydrocarbon contamination of soil and groundwater following	- A closure plan shall be conducted by a qualified environmental professional should operation cease.	Proponent / Environmental Assessment Practitioner (EAP)	- Closure plan submitted to MEFT within agreed timeframe post-closure. - Remediation targets achieved and verified by independent sampling.

Aspect	Nature	Management and Mitigation Measure(s)	Responsible Person	Key Performance Indicator (KPI)
	cessation of operations	- Assessment findings and a remediation plan (if contamination is identified) shall be submitted to MEFT. - If contamination is confirmed, soil remediation and/or groundwater treatment shall be implemented. - Verification sampling shall be undertaken and a Closure Verification Report submitted to MEFT for approval before environmental liability is formally discharged. - Avoid discharge of cement and other pollutants.		- Written MEFT confirmation of environmental liability discharge obtained.
Site Rehabilitation (Closure)	Potential visual, ecological, and land-use impacts from abandoned infrastructure, hard standing surfaces, and disturbed soil at site closure	- All structures, canopy, forecourt hard standing, and ancillary buildings shall be demolished and removed from site (unless alternative use approved by authorities). - The site shall be re-graded and re-vegetated using indigenous plant species suited to the Kunene Region environment. - A Rehabilitation Plan, including a vegetation re-establishment programme, shall be submitted to MEFT for approval prior to commencement.	Proponent / EAP / Site Manager	- Rehabilitation Plan approved by MEFT prior to commencement. - Vegetation re-establishment success monitored and documented at 6-month intervals. - Final Closure Audit Report submitted and accepted by MEFT. - No outstanding environmental liabilities at closure.

Aspect	Nature	Management and Mitigation Measure(s)	Responsible Person	Key Performance Indicator (KPI)
		- Post-rehabilitation monitoring shall be undertaken at 6-month intervals for a minimum of two (2) years. - A Final Closure Audit Report shall be submitted to MEFT upon completion of rehabilitation.		
Stakeholder Engagement and Grievances (Closure)	Community and stakeholder concerns arising from service station closure, decommissioning activities, and site rehabilitation	- The Proponent shall notify all relevant stakeholders (Kunene Regional Council, adjacent landowners and businesses, Opuwo residents) in writing prior to commencement of closure activities. - A grievance mechanism shall remain in place and accessible throughout the entire closure and rehabilitation period. - All grievances received shall be recorded in the grievance register and responded to within 7 working days. - Unresolved grievances shall be escalated to the Proponent or relevant authority.	Proponent / PRO / Site Manager	- Written stakeholder notification issued prior to closure activities. - Grievance register maintained and up to date throughout closure period. - All grievances resolved within 7 working days. - No outstanding unresolved grievances at closure completion.

6. MONITORING, REPORTING AND ECC RENEWAL

6.1. Environmental and Social Management Action

The Updated EMP is responsible for monitoring the environmental and social indicators associated with the project. This is to ensure that EMP measures are clearly outlined and that all involved parties are engaged in the project cycle. The environmental and social measures and actions are enforced to comply with applicable national legislation and to mitigate adverse impacts.

6.2. Monitoring Frequency

Monitoring Activity	Responsible Person	Frequency	Record
Site environmental inspection (general)	ECO/SHE Officer	Monthly	Inspection checklist
Waste disposal records	Site Manager	Weekly	Waste manifest
Spill kit and containment check	SHE/ECO	Monthly	Inspection form
Fire extinguisher inspection	Site Manager	Monthly (service annually)	Service certificate
Underground storage tank leak test	Proponent	Annually	Leak test certificate
Separator pit inspection and cleaning	Site Manager	Quarterly	Maintenance log
Grievance register review	PRO / Site Manager	Monthly	Grievance register
H&S incident register review	SHE/ECO	Monthly	Incident register
Staff induction and training records	Site Manager	Per new appointment	Training register
EMP compliance monitoring report	ECO/EAP	Bi-annually	Monitoring report to MEFT
ECC renewal application	Proponent / EAP	Every 3 years (before expiry)	Submission to DEAF/MEFT

7. Conclusion

This EMP serves as both a statutory document and a practical on-site management tool, catering for operational and maintenance phase (including possible decommissioning). It is the responsibility of the Proponent to ensure that the provisions of this EMP are understood, implemented, and adhered to at all times. Any party found to be responsible for non-conformances with the EMP will be held fully accountable for any rehabilitation, remediation, or corrective measures that may be required as a consequence.

In accordance with the Environmental Management Act (No. 7 of 2007), the ECC issued for renewals shall be valid for a period of three (3) years. It is therefore the sole responsibility of the Proponent to ensure Updated EMP together with a formal application for ECC renewal is submitted to Department of Environmental Affairs and Forestry (DEAF) within the Ministry of Environment, Forestry and Tourism (MEFT), prior to the expiry of the current certificate.

EDS accordingly recommends that the ECC be renewed to allow the Proponent to continue operations of the Ohakane service station, subject to the continued implementation of all mitigation measures contained in this Updated EMP.

Appendix A: Copy of the Current ECC

ECC – 02191 Serial: vOwGx52191

REPUBLIC OF NAMIBIA

MINISTRY OF ENVIRONMENT, FORESTRY AND TOURISM

OFFICE OF THE ENVIRONMENTAL COMMISSIONER

ENVIRONMENTAL CLEARANCE CERTIFICATE

ISSUED

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

TO

Ohakane Service Station
P. O. Box 654, Otjiwarongo

TO UNDERTAKE THE FOLLOWING LISTED ACTIVITY

The Operations of the Existing Ohakane Service Station in Opuwo, Kunene Region.

ENVIRONMENTAL COMMISSIONER

Issued on the date: 2022-05-14

Expires on this date: 2025-05-14

[See conditions printed over leaf]

This certificate is printed without erasures or alterations

Recycle

Appendix B: Archaeology Chance Find Procedure

CHANCE FINDS PROCEDURE (AFTER KINAHAN, 2020)

Areas of proposed development activity are subject to heritage survey and assessment at the planning stage. These surveys are based solely on surface indications, and it is therefore possible that sites or items of heritage significance may be discovered during development work. The procedure set out here covers the reporting and management of such finds.

Scope: The "*chance finds*" procedure covers the actions to be taken from the discovery of a heritage site or item to its investigation and assessment by a trained archaeologist or other appropriately qualified person.

Compliance: The "chance finds" procedure is intended to ensure compliance with relevant provisions of the National Heritage Act (27 of 2004), especially Section 55 (4): "*a person who discovers any archaeological …. Object ……must as soon as practicable report the discovery to the Council*". The procedure of reporting set out below must be observed so that heritage remains reported to the NHC are correctly identified in the field. Manager/Supervisor must report the findings to the following competent authorities:

- National Heritage Council of Namibia (061 244 375 / Technical Office +264 61 301 903)
- National Museum (061 276800),
- National Forensic Laboratory (061 240461).

Archaeological material must NOT be touched. Tampering with the materials is an offence under the Heritage Act and punishable upon conviction by the law.

Responsibility:

Operator:	To exercise due caution if archaeological remains are found
Foreman:	To secure the site and advise management timeously
Superintendent:	To determine the safe working boundary and request an inspection
Archaeologist:	To inspect, identify, advise management, and recover remains

Procedure:

Action by a person identifying archaeological or heritage material:

a) If operating machinery or equipment, stop work

b) Identify the site with flag tape

c) Determine GPS position if possible

d) Report findings to the foreman

Action by the foreman

a) Report findings, site location and actions taken to the superintendent

b) Cease any works in the immediate vicinity

Action by the superintendent

a) Visit the site and determine whether work can proceed without damage to findings

b) Determine and mark the exclusion boundary

c) Site location and details to be added to the project GIS for field confirmation by the archaeologist

Action by an Archaeologist

a) Inspect the site and confirm the addition to the project GIS

b) Advise NHC and request written permission to remove findings from the work area

c) Recovery, packaging and labelling of findings for transfer to the National Museum

In the event of discovering human remains

a) Actions as above

b) Field inspection by an archaeologist to confirm that the remains are human

c) Advise and liaise with NHC and Police

d) Recovery of remains and removal to the National Museum or the National Forensic Laboratory, as directed.