



**CLEANERGY
SOLUTIONS**
NAMIBIA

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REPORT:

GREEN HYDROGEN DEMONSTRATION PLANT – COMPLIANCE REPORT

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EXECUTIVE SUMMARY

Cleanergy Solutions Namibia (Pty) Ltd (hereafter referred to as “Cleanergy Solutions” or “the Proponent”) operates the Green Hydrogen Demonstration Plant (hereafter referred to as “GHDP”) on Portion 8 of Farm 58, Walvis Bay, Erongo Region, Namibia. The GHDP comprises an integrated green hydrogen production and refuelling facility, which was officially opened on 19 September 2025.

The GHDP environmental clearance certificate (ECC-2300257) was issued by the Ministry of Environment, Forestry and Tourism (MEFT) on 14 March 2023 and remains valid until 14 March 2026 (refer to Appendix A). A renewal of the environmental clearance certificate is required to ensure continued operation of the GHDP.

No environmental issues, social issues nor any non-compliances with the approved EMP were identified during the period under review (i.e. 14 March 2023 – January 2026). All Project activities were undertaken in accordance with the prescribed environmental management measures stipulated in the approved environmental management plan (EMP) of 2022. The Proponent further demonstrated commitment and compliance with regulatory requirements through regular submission of bi-annual environmental reports to MEFT. This consistent reporting and adherence to EMP requirements indicate effective environmental management and responsible Project implementation.

The EMP of 2022 has been revised and updated into an environmental and social management plan (ESMP) to include renewal activities, environmental and social aspects associated with the additional construction and operational activities of the GHDP (Appendix D).

Upon renewal of the environmental clearance certificate, the Proponent shall continue to comply with all reporting requirements prescribed by MEFT and comply with all the conditions outlined in the renewed environmental clearance certificate and implement all management and mitigation measures stipulated in the approved and revised EMP. Project personnel shall maintain strict adherence to all applicable environmental legislation, licence conditions, approved management plans, internal standard operating procedures (SOP's) and recognised best environmental practices. The Proponent shall also maintain ongoing engagement with stakeholders and interested and affected parties (I&APs), including the Walvis Bay International Airport, Dune 7 Adventures and the Walvis Bay Municipality.

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ABBREVIATIONS

Abbreviation	Description
%	percentage
°	degree
>	greater than
°C	degree Celsius
AR	anti-reflective
EA	environmental authorisation
bar	Unit for pressure
Cleanergy Solutions	Cleanergy Solutions Namibia (Pty) Ltd
CH ₃ OH	methanol
DEAF	Department of Environmental Affairs and Forestry
ECC	Environmental Compliance Consultancy (Pty) Ltd
ECO	environmental control officer
EMA	Environmental Management Act, No. 7 of 2007
EMP	environmental management plan
ESMP	environmental and social management plan
etc.	et cetera
ERP	emergency response plan
GHG	greenhouse gasses
GHDP	Green Hydrogen Demonstration Plant
GIS	geographic information system
H ₂	hydrogen
ha	hectare
HSE	health, safety and environment

Abbreviation	Description
HSP	health and safety plan
I&APs	interested and affected parties
IFC	International Finance Corporation
kg/h	kilogram per hour
km/h	kilometres per hour
KW	kilowatt
Ltd	limited
m	metre
m ³	cubic metre
MEFT	Ministry of Environment, Forestry and Tourism
MIME	Ministry of Industries, Mines and Energy
MSDS	material safety data sheets
mtpd	metric tonnes per day
MW	megawatts
MWh	megawatt-hour
MWp	megawatts-peak
NHC	National Heritage Council
NH ₃	ammonia
NSRs	noise sensitive receptors
PEM	polymer electrolyte membrane
PMP	preventative maintenance programme
PPE	personal protective equipment
Pty	proprietary
PV	photovoltaic
SED	Synfuels Environmental Department
SME	small and medium-sized enterprise
SOP	standard operating procedure
WBM	Walvis Bay Municipality
WMP	waste management plan

1 INTRODUCTION

1.1 BACKGROUND INFORMATION

Environmental Compliance Consultancy (Pty) Ltd (ECC) has been engaged by Cleanergy Solutions Namibia (Pty) Ltd (hereafter referred to as “Cleanergy Solutions” or “the Proponent”) to compile and submit an environmental clearance certificate renewal application for ongoing operations of the Green Hydrogen Demonstration Plant (hereafter referred to as “GHDP”). The GHDP comprises an integrated green hydrogen production and refuelling facility, which was officially opened on 19 September 2025.

The GHDP environmental clearance certificate was issued by the Ministry of Environment, Forestry and Tourism (MEFT) on 14 March 2023 and remains valid until 14 March 2026 (ECC-2300257) (refer to Appendix A). In this regard, a renewal of the environmental clearance certificate is required to ensure continued operations of the GHDP. The Project is located on Portion 8 of Farm 58 (a re-zoned industrial area near Dune 7 Adventures), Walvis Bay, Erongo Region, Namibia. The Project covers a footprint of approximately twenty-four (24) hectares (ha) and can be accessed via the newly developed D1984 highway road between Walvis Bay and Swakopmund (Figure 1).

1.2 CURRENT GHDP OPERATIONS

The Project involves the production of green hydrogen, aiding in the decarbonisation of the heavy transport sector.

Table 1 Below are the main components of the GHDP for which the current environmental clearance certificate (ECC-2300257) was granted compared to the components currently installed and in operation:

Table 1 - Proposed main components of the GHDP compared to actual components installed and currently operating

Elements granted in 2023 ECC	Elements currently installed and in operation
A five (5) megawatts-peak (MWp) solar photovoltaic (PV) plant, with tracker configuration covering an area of approximately fifteen (15) ha;	A five (5) megawatts-peak (MWp) solar photovoltaic (PV) plant, with tracker configuration covering an area of six and half (6.5) ha;
A five (5) megawatts (MW) battery energy storage system;	A five dot nine (5.9) megawatt hours (MWh) battery energy storage system; (Total BESS power is 5MW and BESS capacity is 5.9MWh)
A five (5) MW proton exchange membrane (PEM) electrolyser	A five (5) MW proton exchange membrane (PEM) electrolyser

One (1) hydrogen generation alkaline electrolyser system with a capacity of 100-300 Kilowatt (KW)/2-6 kg/h	The forms part of the enhancement phase.
Three (3) 45 kg/h hydrogen compressors to densify the hydrogen gas for storage	Three (3) 45 kg/h hydrogen compressors to densify the hydrogen gas for storage
Hydrogen buffer tanks and storage tanks (40 bar/300 bar/500 bar)	Hydrogen buffer tanks and storage tanks (40 bar/300 bar/500 bar)
Two (2) 350-bar hydrogen dispensers for refuelling heavy-duty vehicles	Two (2) 350-bar hydrogen dispensers for refuelling heavy-duty vehicles
Two (2) 500-bar hydrogen tube trailer filling station;	Two (2) 500-bar hydrogen tube trailer filling station;
Two (2) air compressors and nitrogen generators installed in a 40 feet container	Two (2) air compressors and nitrogen generators installed in a 40 feet container
Water storage tanks with a total capacity of 400 cubic meters (m ³)	Water storage tanks with a total capacity 522m ³ (326m ³ fire water tank + 196m ³ domestic water tank)
A green hydrogen academy (information centre for training)	A green hydrogen academy (information centre for training)
Access road	Access road
Water connection (pipeline connecting to main NamWater supply);	Water connection (pipeline connecting to main NamWater supply);
Grid connection (Erongo RED).	Grid connection (Erongo RED) Not commissioned and not operational
A green hydrogen academy (information centre for training)	A green hydrogen academy (information centre for training and support infrastructure - electrical building, pump room, control plant room and technical plant room, store plant room and workshop

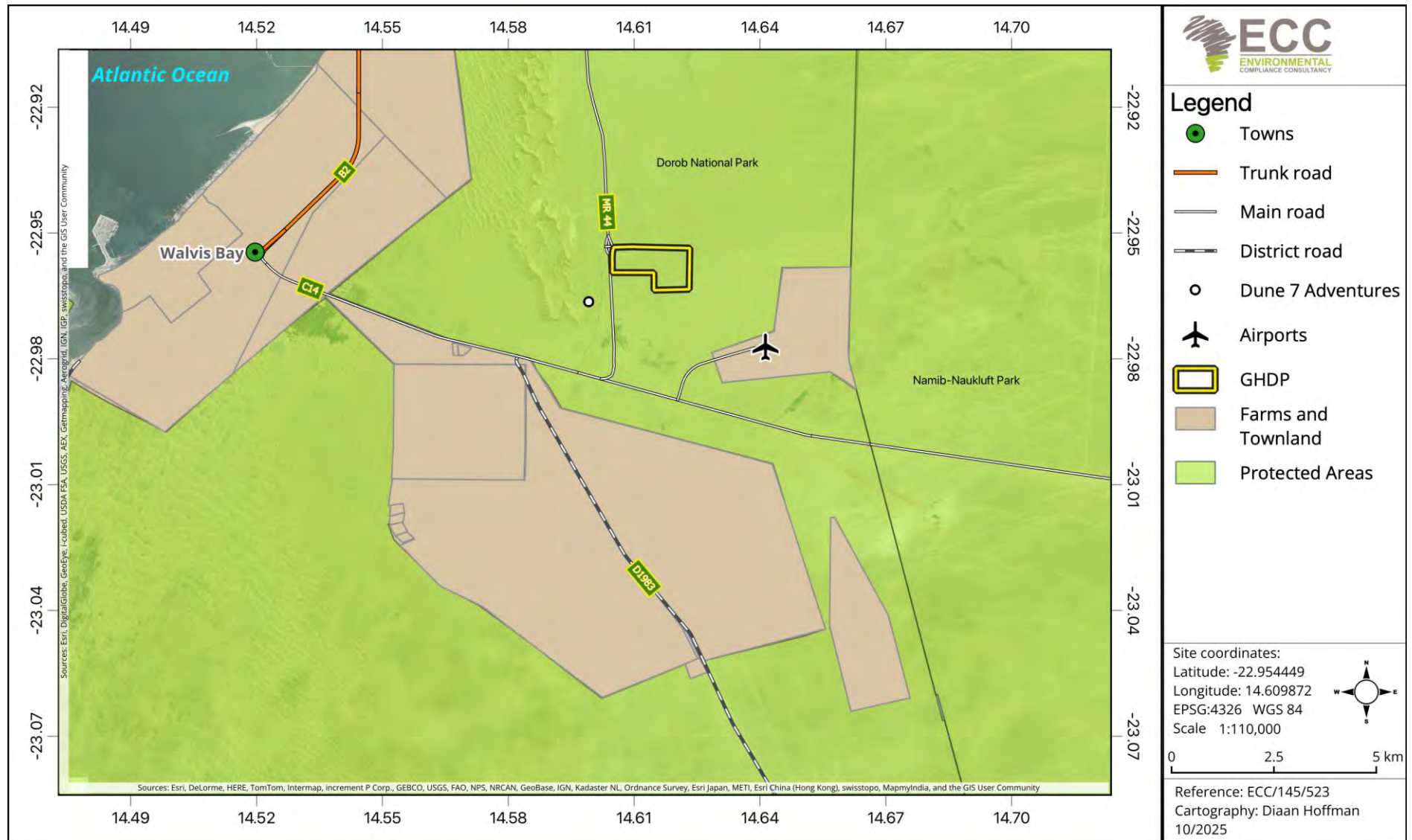


Figure 1 - Location of the GHDP

1.3 PURPOSE OF THE REPORT

This report aims to determine whether the Proponent's Project activities are compliant with the requirements of the 2022 environmental management plan (EMP) (Appendix B). To this effect, an environmental desktop compliance audit has been conducted, which included the review of bi-annual environmental reports (Appendix C) submitted to MEFT by the Proponent for the reporting period between March 2023 and December 2025. The EMP of 2022 has been updated into an environmental and social management plan (ESMP) to reflect the Project's renewal activities (Appendix D).

1.4 THE PROPONENT OF THIS PROJECT

Cleanergy Solutions holds a long-term lease agreement with Walvis Bay Municipality (WBM) over Portion 8 of Farm 58, on which the Project is developed. Cleanergy Solutions Ltd was formed in 2021 and is duly registered in Namibia and is currently wholly owned by CMB.TECH Namibia (Pty) Ltd. The contact details of the company designated representative is provided in Table 2.

Table 2 – Proponent's details

Company representative	Contact details
Ms L Verhaert Head of H2 Infra	CMB.TECH Namibia (Pty) Ltd: No.1 Charles Cathral Street P O Box 81588, Olympia, Windhoek, Namibia Liesbeth.verhaert@cmb.tech +32 479 56 15 06

2 RENEWAL ACTIVITIES

Cleanergy Solutions intends to continue with the GHDP operations. A renewal of the environmental clearance certificate is being sought to ensure compliance the Project remain compliant with the environmental legislations (i.e. Environmental Management Act, No. 7 of 2007 (EMA) and the 2012 Regulations). As part of the environmental clearance certificate renewal application, the EMP of 2022 has been revised and updated into an ESMP (Appendix D) to reflect the current Project activities. The updated ESMP (2026) becomes a legally binding document, once approved by the Department of Environmental Affairs and Forestry (DEAF), along with the renewal of the environmental clearance certificate.

As part of ongoing development, the Proponent proposes to upgrade operations of the GHDP through several key Project enhancements aimed at increasing operational capacity and overall production. These enhancement features are discussed in detail in the amended scoping and impact assessment report (ECC-145-523-REP-02-D) that is submitted along with the environmental clearance certificate renewal.

The proposed upgrades include:

- Extension of the solar park from 5 MWp to 100 MWp
- Battery extension from 5.9 MWh to 230 MWh
- 5 MW electrolyser (alkaline);
- The construction of an ammonia plant (4 mtpd);
- New utilities: Flare, Nitrogen Generation Unit, Water Treatment plant, and cooling water system.

3 ENVIRONMENTAL COMPLIANCE AUDIT

3.1 COMPLIANCE AUDIT FINDINGS

This section outlines the findings of the desktop environmental compliance audit completed for the Project. It addresses obligations in terms of the key Acts that govern the activities on-site, the commitments made in the 2022 EMP and presents the recommended corrective actions, where applicable.

The EMP:

- Identify all GHDP activities that could cause environmental damage (risks and potential impacts) and provide a summary of actions required;
- Identifies institutions responsible for ensuring compliance with the EMP and provides their contact information;
- Provides standard procedures to avoid, minimise and mitigate the identified negative environmental impacts;
- Provides for site rules and actions required;
- Forms a written record of procedures, responsibilities, requirements and rules for contractor/s, their staff and any other person who must comply with the EMP;
- Ensure zero pollution incidents, minimal vegetation clearing, protection of local flora, fauna and water resources and use water and other natural resources effectively and efficiently;
- Provides a monitoring and auditing program to track and record compliance and identify and respond to any potential or actual negative environmental impacts;
- Provides a monitoring program to record any mitigation measures that are implemented;
- Ensure that regular independent third-party environmental audits are carried out on a regular basis; and
- Once Project has ceased, the Project site will be rehabilitated to a safe, stable and environmentally sustainable condition in accordance with approved environmental management and rehabilitation plans.

3.1.1 ISSUES OF NON-COMPLIANCE

No issues of non-compliance have been identified during the period under review. The desktop compliance audit findings are summarised in Table 3. The photographs presented in section 3.1.2 (construction phase) and section 3.1.3 (operation phase) have been sourced from the biannual environmental reports that were compiled during the period under review and served as supporting evidence in the desktop compliance audit.

3.1.2 GHDP CONSTRUCTION PHASE

3.1.2.1 General construction activities



Figure 2 - Construction of Project building (a) and site temporary support structures during construction (b)

3.1.2.2 General and hazardous waste management



Figure 3 - Solid waste segregation bags used on site during construction



Figure 4 - Portable toilets kept on site for employees and visitors during construction

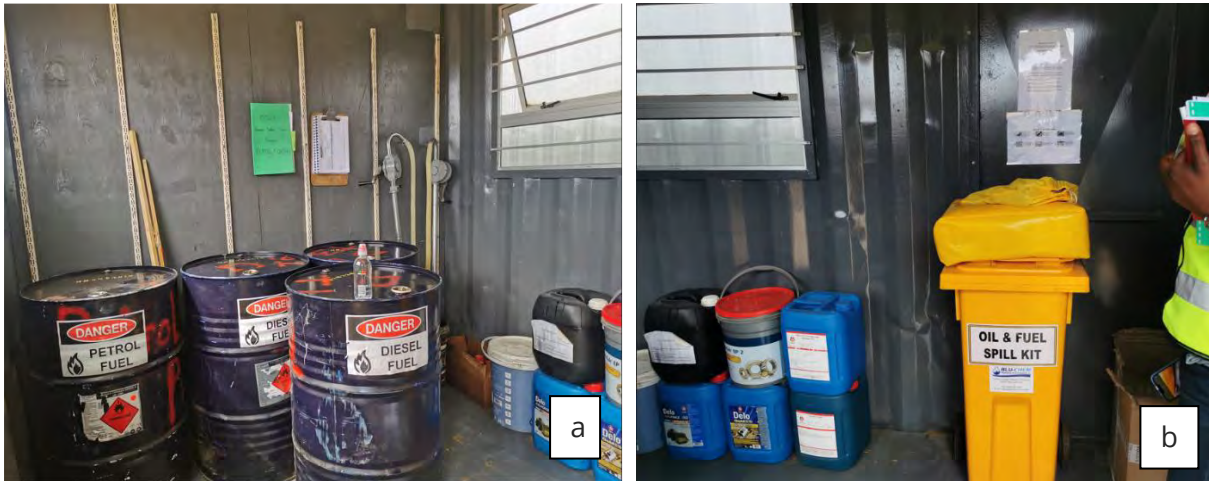


Figure 5 - Fuel drums and lubricant containers (a) and an oil and fuel spill kit stored on (b), all on impermeable surfaces inside a secure shed

3.1.2.3 First aid kit, emergency response measures and training records





Figure 6 - A complete first aid kit on site (a), first aid training certificates for trained employees on site (b)

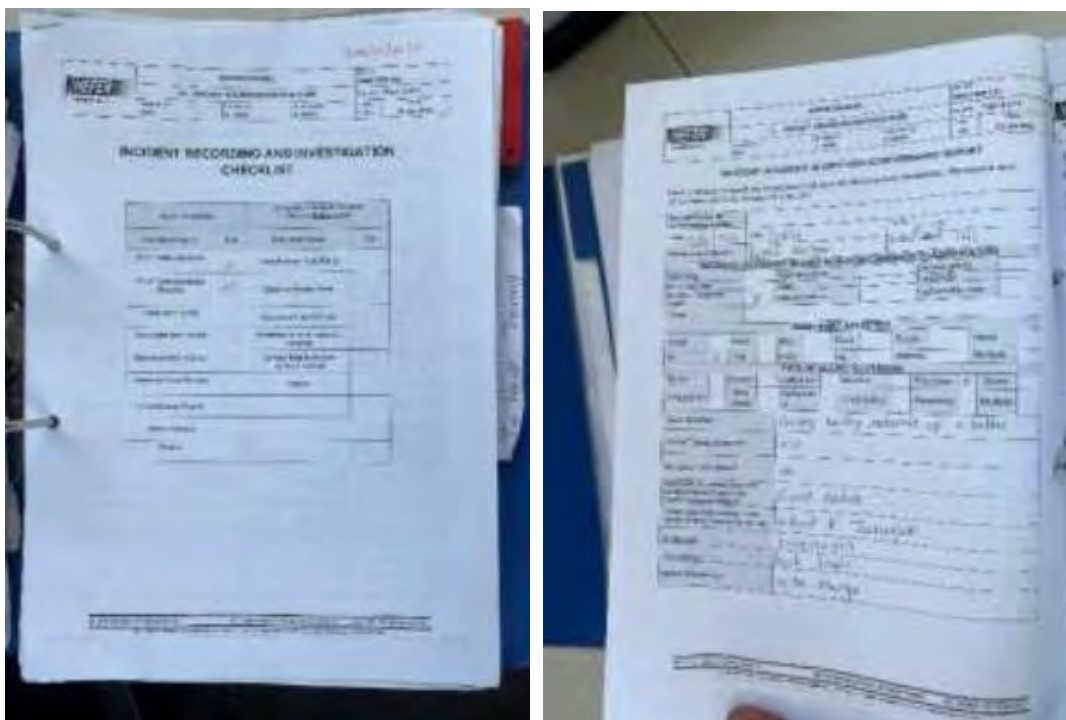


Figure 7 - Incident recording and investigation register available on-site during construction



Figure 8 - An assembly point on site

3.1.2.4 *Health, safety and security*





Figure 9 - Serviced fire extinguisher (a), employee wearing the required PPE (b) and meshed fence surrounding the Project footprint (c)

3.1.2.5 Warning signages



Figure 10 - Vehicle speed limit and no entry signs (a) and site safety signs (b) during construction

3.1.3 GHDP OPERATIONAL PHASE

3.1.3.1 General and hazardous waste management

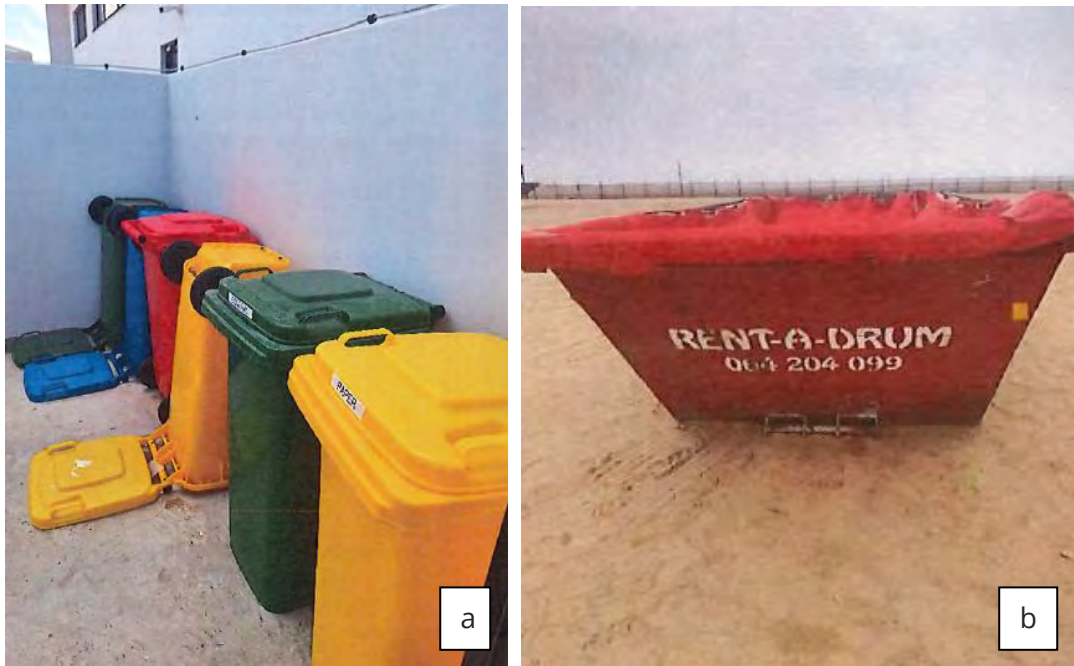


Figure 11 – Different coloured waste bins to encourage waste segregation and recycling (a) and covered waste skip (b)



Figure 12 - Sheen bin in ablution facility (a) and gender segregated ablution facilities on site (b)

3.1.3.2 First aid and safety signage



Figure 13 - First aid and safety signs displayed at the GHDP

3.1.4 DESKTOP EMP COMPLIANCE AUDIT FINDINGS

Table 3 below provides a summary of the desktop EMP compliance audit, with findings assessed against the requirements and conditions depicted in the original EMP of 2022. The compliance findings have been drawn from the bi-annual reports provided by the Proponent.

Table 3 - Desktop EMP compliance audit findings for the GHDP Project phases

Objective	Project stage	Mitigation and management measures and principles	Compliance	Comments
Planning and design				
Incorporate design criteria to limit potential environmental and social impact.	- Pre-construction	- Socio-economic impact assessment to be undertaken focused on managing of construction phase socioeconomic impacts. All management measures proposed must be implemented.	- Compliant	- The Proponent made use of local contractors (Hefer Projects Namibia CC) and subcontractors (SCE Consulting Engineers, Rautenbach Enssle Quantity Surveyors). These contractors ensured the Project architectural designs and specifications were pre-planned and in place prior to the commencement of the construction phase.
		- Local employment and procurement targets for the contractor for inclusion into tender documents must be developed by Cleanergy.		
		- Contractors to: - o Compile a social and environmental policy in line with Cleanergy's health, safety and environmental (HSE) policy to which compliance will be reviewed against; and - o Develop and submit task/site-specific health and safety plans covering environmental, health & safety aspects as well as work method statements.		
		- The Cleanergy GHDP Project to allow for all hazardous chemical storage equipment (e.g., tanks) to meet appropriate standards for structural design and integrity.		

Objective	Project stage	Mitigation and management measures and principles	Compliance	Comments
		– Bund sizing will be designed at 110% of the largest tank volume minus the volume occupied by any adjacent tanks in the same bund.		- All employees and on-site personnel were informed, trained and required to demonstrate an understanding of the EMP. - The Project development activities were carefully planned to be conducted within the boundary of Portion 8 of Farm 58.
		– Dry chemical and paint storage areas shall have restricted access (i.e., lockable) and have impervious floors and adequate weather protection against rain and wind to prevent accidental spillage, dispersal or spoilage of stored chemicals;		
		– Adequate provision must be made for the collection and storage of solid waste: ○ Storage areas should be weather resistant; ○ Provision for the separation and storage of recyclables and returnable packaging must be made to reduce the volume of waste ultimately entering the landfill site; and ○ Provision should be made for dedicated hazardous waste storage facilities with signposted receptables.		
		– Project footprint to be minimised by optimizing the use the available footprint.		
		– A hazardous risk assessment to be undertaken to cover safety systems of the equipment with particular reference to the monitoring of the hydrogen concentration within the building and associated mitigation to prevent the explosion of		

Objective	Project stage	Mitigation and management measures and principles	Compliance	Comments
		hydrogen. Process hazard analyses and an emergency response plan to be developed.		
		– Geotechnical investigation to be undertaken.		
		– Designate the eroded granite ephemeral riverbank to the east (E) of the GHDP area as a no-go area;		
		– Lightning must be planned and designed to avoid the spillage of artificial light into the surrounding areas and to reduce the potential impact on the Walvis Bay Airport's operations. The type of lighting, the position, direction and height thereof must be carefully considered to reduce the magnitude of light spilt into the surrounding environment. Outside lighting of the facility, including security lighting must be kept to the absolute minimum.		
		– Overhead lighting to be shielded and pointing downwards onto the area where illumination is required and not be directed upwards or outwards. The International Dark-Sky Association's guidelines for the quality of outdoor lighting can be used as reference for preserving and protecting the night-time environment, including its wildlife (www.darksky.org).		
		– Solar PV panels must be designed as such to limit the potential glint and glare impacts originating it.		

Objective	Project stage	Mitigation and management measures and principles	Compliance	Comments
		– Adequate bird and bat protection management must be incorporated into the design of the Project including but not limited to: ○ Buildings and other infrastructure to be designed as such to minimise the potential for bat and bird nesting; ○ Servitudes for roads, cables and pipelines should share servitudes as far as practically possible; and ○ The upper wire strand of all fencing should be demarcated to ensure that it is visible to low flying birds in low light conditions. – The Cleanergy GHDP Project to allow for leak detection technology. – The Cleanergy GHDP Project to allow for shutdown valves to shut down or isolate tanks and pipes. – Adequate stormwater management must be incorporated into the design of the Project. Stormwater releases to the environment must be at pre-development discharge rates. – Road width to be kept to a minimum. Run-off control measures must be constructed on either side of roads to allow for small terrestrial animals to cross. Ditches/trenches should have slopes of less than 45° and vertical sides should be avoided.		

Objective	Project stage	Mitigation and management measures and principles	Compliance	Comments
		– Placement of material stockpiles must be planned as such to be within the areas designated as having a low sensitivity and outside of drainage lines.		
		– Boundaries of the GHDP should be positioned at least 45 m from the edge of road D1984.		
		– Road safety measures are to be employed to manage traffic and to reduce traffic collision risks.		
		– Ensure that road junctions between the D1984 and the access roads have good lines of sight.		
		– Signage should be erected in cooperation with local authorities to show restricted areas and roads, access points, speed limits, traffic rules, etc.		
		– Stakeholder communication plans for emergency response and coordination to be developed in the event of an aircraft crash.		
Site documentation and reporting				
Contingencies for minimising negative impacts anticipated to	- Pre-construction and decommissioning	– A physical access plan to the construction area (and camp is to be established) must be compiled and the contractor must adhere to this plan at all times	- Compliant	- The Proponent adhered to these components as all

Objective	Project stage	Mitigation and management measures and principles	Compliance	Comments
occur during the construction, Operational and decommissioning phases.		- Provide environmental control officer (ECO) with a layout of the site indicating the position of all of the following, as applicable: - o Ablution facilities; - o Storage areas; - o Ready-mix areas; - o Stockpile areas; - o Waste disposal facilities; and - o Hazardous substances storage areas.		required facilities were present on site (refer to Figure 2).
	- Construction, operational and decommissioning	- Complaints register to be kept on site.	- Compliant	- An incident register (refer to Figure 7) was available on site.
		- An environmental incident register to be kept on site		
		- Safe disposal certificates shall be stored and provided on request.		
		- Non-conformance reports to be kept on site.		
		- Written corrective actions to be kept on site.		
		- A copy of the environmental authorisation (AE) to be kept on site.		
		- A copy of the EMP to be kept on site.		
		- Copies of applicable Cleanergy operating procedures to be kept on site.		

Objective	Project stage	Mitigation and management measures and principles	Compliance	Comments
	- All	- Copies of applicable Cleanergy operating procedures to be kept on site.	- Compliant	- All appropriate plans and documentation were kept on site. - A copy of the EMP was readily available during the on -site audits conducted during the construction phase (refer to the bi-annual environmental reports in report Appendix C).
	- Pre-construction and decommissioning	- Update the health and safety plan (HSP) to include the Cleanergy GHDP Project.		
		- Update the emergency response plan (ERP) to include the Cleanergy GHDP Project.		
		- Update the waste management plan (WMP) to include the Cleanergy GHDP Project.		
		- Update the preventative maintenance programme (PMP) to include the Cleanergy GHDP Project.		
		- The main contractor must draw up method statements for relevant construction/decommissioning activities.		
Project contract and program				
Contingencies for minimising negative impacts anticipated to occur during the construction/ decommissioning phase.	- Pre-construction and decommissioning	- This EMP must be included as part of the tender documentation thereby making it part of the required scope of work. The mitigation measures as set out in this EMP are enforceable under the general conditions of contract.	- Compliant	- The Proponent adhered to this component of the EMP.
		- Each contractor will employ their own Safety Officer to monitoring the safety conditions during the construction phase. Cleanergy Safety Officer will oversee the contractor.		

Objective	Project stage	Mitigation and management measures and principles	Compliance	Comments
		The main contractor must draw up method statements for relevant construction/decommissioning/maintenance activities.		
Environmental awareness				
Ensure contractors are aware of the required management measures stipulated in the EMP.	- Construction, operational and decommissioning	The contractor must ensure that all the personnel on site are familiar with and understand the specifications contained in the EMP.	- Compliant	- Employees were informed about the content of the EMP and its requirements thereof. - Inductions were conducted with employees, visitors and contractors. These records were recorded in the risk assessment document. - First aid kits were in place, and first aiders were available on-site. First aid training certificates were kept on file (Figure 6 and Figure 13).
		Contractors and personnel should be required to participate in training and awareness programs. Proof of training to be kept on file.		
		All workers that have completed the induction should sign that they have understood and will implement the measures required.		

Objective	Project stage	Mitigation and management measures and principles	Compliance	Comments
	- Construction and decommissioning	- The contractor is expected to have safety “toolbox” talks in accordance with the risks and trends associated with the Project. Proof of these talks shall be kept on site.	- Compliant	- Toolbox talks were conducted with construction personnel during the construction phase.
	- Pre-construction	- The contractor will develop a specific emergency procedure and plan.	- Compliant	- The Proponent ensured an emergency assembly point was established (Figure 8). - Serviced fire extinguishers were place (Figure 9).
Socio – economic, health and safety				
Increase employment opportunities.	- Pre-construction and decommissioning	- Encourage the local employment for the following: o Employment opportunities for local small and medium-sized enterprise (SME) contractors during site clearance, preparation and construction.	- Compliant	- The Proponent, through its principal contractor, Hefer Projects Namibia, predominantly employed local and Namibian personnel. Proof of appointment of local contractors is on file.

Objective	Project stage	Mitigation and management measures and principles	Compliance	Comments
Increase positive contribution to air quality.	- Operational	- Transfer experience regarding green hydrogen production.	- Compliant	- Cleanergy Solutions actively promotes knowledge and skills transfer through the green hydrogen training academy.
Increase skills development.	- Operational	- Demonstrate the potential successful commercialisation of green hydrogen in Namibia.	- Compliant	- As of September 2025, sixteen (16) individuals are permanently employed on site, 93.7% of whom are Namibian nationals.
		- Train local employees with the conversion of renewable electricity into green hydrogen molecules.		
Increase contribution to Namibian economy.	- Operational	- Encourage economic investment as a result of producing and selling green hydrogen.	- Compliant	- The Proponent continues to encourage investment and collaboration within the green energy industry.
Reduce potential dust impact.	- Construction, operational and decommissioning	- Reduce speed limits to 40 km/h or recommended limit based on risk evaluation.	- Compliant	- Vehicle speed limit to 30 km/h was present on site (refer to Figure 10)
		- Reduce speed limits to 40 km/h or recommended speed limit based on risk evaluation	- Compliant	- Vehicle speed limit signage (30 km/h) was

Objective	Project stage	Mitigation and management measures and principles	Compliance	Comments
Reduce potential impact on safety and security.	- Construction, operational and decommissioning	- An inventory of all chemicals on site must be kept together with the respective material safety data sheets (MSDS).		erected on site (refer to Figure 10).
		- No alcohol /drugs are permitted on site.		- PPE was worn on site on site (Figure 9).
		- No firearms allowed on site, unless used by security personnel.		- Signage related to restricted areas, dangerous areas and PPE requirements were clearly displayed onsite (Figure 10).
		- Correct personal protective equipment (PPE) must be worn at all times by the personnel on site. Personnel must be trained on the use of PPE.		- No open fires were lit on site.
	- Construction and decommissioning	- A register will be kept on what PPE has been issued and when. Contractors are to take disciplinary action against employees who fail to adhere to the PPE requirements.		- Flammable materials such as fuels, plastics and paper are securely stored in designated containers on impermeable surfaces (Figure 5).
	- Construction, operational and decommissioning	- In the event of an emergency, the Contractor shall contact the Cleanergy emergency services. Telephone numbers of Cleanergy emergency services must be posted conspicuously at the site.		- Additionally, there were four (4) fire extinguishers onsite.
	- Construction	- Although not compulsory it is recommended that the foundations excavations must be inspected by a qualified geologist prior to placing any concrete and/or commencing backfilling.		
		- No fires are allowed on the site, unless in areas demarked and managed for this purpose.		

Objective	Project stage	Mitigation and management measures and principles	Compliance	Comments
	- Construction, operational and decommissioning	- All workers will be made aware of fire risks.		
Reduce potential impact on the sense of place as a result of land clearing.	- Construction and operational	- Limit the aerial extent of the disturbance to the exact footprint of the proposed development, including the laydown areas surrounding the primary footprint.	- Compliant	- The Proponent adhered to this component by maintaining all Project related activities within the Project footprint (i.e. Portion 8 of Farm 58).
Ensure that there are enough ablution facilities available and that the ablution facilities are operated in an environmentally responsible manner.	- Construction and decommissioning	- Sufficient ablution facilities shall be provided to service the site.	- Compliant	- Portable toilets were provided during the construction phase (Figure 4).
	- Construction, operational and decommissioning	- The maximum walking distance from a work site to a toilet shall not exceed 200 meters (m).	- Compliant	- The Proponent adhered to this component of the EMP. The toilet facilities are within the office (refer to Figure 12).
		- Ablution facilities shall not be placed within 100-year floodline of any water course, identified wetlands or boreholes used for drinking water.		
	- Construction and decommissioning	- Ablution facilities shall be serviced on a regular basis by an approved service provider to keep them in good functional working order and in an acceptable state of hygiene.		- Wastewater was contained in the portable toilets which

Objective	Project stage	Mitigation and management measures and principles	Compliance	Comments
		- Contents from the chemical toilets shall not be discharged into the environment but shall be removed by an approved service provider.		were emptied twice a week.
		- The necessary agreement between the service provider and the contractor for the removal of the sewage must be in place and shall be made available on request.		
Groundwater				
Reduce the potential impact on groundwater as a result of the construction and operation of the Cleanergy GHDP Project.	- Operation	- The tanks are to be fitted with High Level Alarms. These alarms are activated when product filling approaches the maximum capacity of the tank allowing sufficient time for transfer of product into the tank to be stopped.	- Compliant	- During construction, all precautions were taken to prevent contamination of the soil and water resources (lined fuel storage and handling areas). - MSDSs were available onsite during construction. - Currently, the Project activities conducted pose no negative threats to groundwater resources.
		- Commissioning of the tanks will only occur once a leak test certificate has been issued.		
	- Construction, operation and decommissioning	- The tanks will be placed within a bunded area. The bunded area will be frequently inspected and repaired when necessary.		
		- Storm water generated around the site will be diverted away to the clean water environment.		
		- No washing of vehicles shall be allowed outside demarcated areas. Washing bays for vehicles and other equipment shall be provided with appropriate soak ways, will be clearly demarcated and will not be allowed to contaminate any surface runoff.		

Objective	Project stage	Mitigation and management measures and principles	Compliance	Comments
		- Sufficient areas shall be provided for the maintenance and washing of vehicles.		- Low quantities of lubricant are stored within areas with ground cover and adequate bunding (Figure 5). - All gaseous installations are within areas with impermeable flooring with water flow channels that lead to a bigger containment area.
		- Refuelling of vehicles will only be allowed in designated areas.		
		- All construction equipment shall be parked in a demarcated area and provided with a drip tray.		
		- Surface bulk storage of hydrocarbons must be situated in a dedicated area, which will include a bund or a drain where necessary to contain any spillages during the use, loading and off-loading of the substance.		
		- Bund sizing will be done at 110% of the largest tank volume minus the volume occupied by any adjacent tanks in the same bund.		
		- Bund areas must be impermeable.		
		- Bund area must have a facility such as a valve/sump to drain or remove clean stormwater.		
		- Contaminated water shall be pumped into a container for appropriate removal and disposal.		
		- Regular inspections shall be carried out to ensure the integrity of the bund walls.		
		- All vehicles shall be on a preventative maintenance schedule to ensure that the equipment is in a good working order to prevent the leakages of oil and diesel.		
	- Construction and decommissioning	- All preventative servicing of earth moving equipment and construction vehicles shall be serviced off site.		

Objective	Project stage	Mitigation and management measures and principles	Compliance	Comments
	- Construction and operations	- Tarpaulins will be placed on the ground to prevent oil, grease, hydraulic fluid and diesel spills during emergency repairs. All oil spills will be remedied using approved methodologies. The contaminated soils will be removed and disposed of responsibly.		
		- The borehole water quality and yield programme for the Cleanergy Synfuels Operations will be updated to include additional parameters as recommended in the Geotechnical Study and monitored.	- Non-applicable	- No spills occurred near water sources of drainage areas.
Surface water				
Reduce the potential impact on surface water, wetlands and aquatic ecosystems as a result of the construction and operation of the Cleanergy GHDP Project.	- Construction and operations	- Ensure clean and dirty water segregation.	- Compliant	- Spill kits were kept on site (Figure 5). - No reportable hydrocarbon spills were recorded onsite during the period under review. - No process water or effluents are directly discharged into the environment.
		- Spill kits to be made available at areas of possible spillages of hazardous substances.		
		- Drivers and operators shall be trained to use spill kits and contain spillages to the smallest possible areas, and the training records shall be made available on request.		
		- Remediation of spillages must be conducted on a continual basis.		
		- Contaminated runoff will be contained and connected to the site oily water sewer, where practical.		

Objective	Project stage	Mitigation and management measures and principles	Compliance	Comments
	- Pre-Construction, construction and operation	- Adequate stormwater management must be incorporated into the design of the Project in order to prevent contamination of watercourses and wetlands from dirty water.		
	- Construction and operation	- No direct discharge of polluted water to the environment is permitted, unless authorised by Synfuels Environmental Department (SED).		
		- An inspection programme shall be implemented to ensure that all the mechanical equipment is inspected regularly to ensure the optimal functioning of the equipment.		
		- Refuelling of equipment shall occur in designated areas by trained people.		
		- Bund sizing will be done at 110% of the largest tank volume minus the volume occupied by any adjacent tanks in the same bund, with an allowance of an additional 300 mm used for ballast stones placed in the tank bunds		
		- Contaminated soil shall be removed and disposed of to an appropriate licenced landfill site or can be removed by a service provider that is qualified to clean the soil.		
Air quality				
Reduce the potential for nuisance dust, the emission of carbons	- Construction and operations	- Mitigation measures may be implemented to reduce dust levels from the entrainment of dust. These measures will range from watering of roads, application of a chemical dust suppressant and/or paving of roads.	- Compliant	- Vehicle speed limit (30 km/h) signage is erected onsite (refer to Figure 10).

Objective	Project stage	Mitigation and management measures and principles	Compliance	Comments
and other ambient air pollutants.		- A speed limit of 40 km/h (or limit as determined by a risk assessment) shall apply to limit vehicle entrained dust from the unpaved roads.		- All loose materials including waste were covered to prevent them from being windblown (Figure 3 and Figure 11).
		- Ensure that all exposed areas and material stockpiles are adequately protected against the wind. This may include the wetting of exposed soil/gravel areas during windy conditions, covering of material stockpiles, etc.		- During construction, portable toilets were emptied twice a week.
		- All construction equipment must be scheduled for preventative maintenance to ensure the functioning of the exhaust systems to reduce excessive emissions and limit air pollution.		- A hygiene survey was conducted in October 2025 within office and plant facilities.
		- Chemical toilets must be emptied / serviced on a regular basis. Proof of this must be kept on file.		
Climate change				
Reduce the emissions of greenhouse gasses (GHG) as a result of the use of construction vehicles and machinery.	- Construction and operations	- All the construction vehicles shall undergo maintenance on a regular basis to ensure the combustion engine vehicle efficiency.	- Compliant	- During construction, all vehicles were maintained and serviced. Currently there are only a few private vehicles on site and no equipment with combustion engines.
	- Construction and decommissioning	- Ensure regular servicing and maintenance of all combustion engine operated machinery.		

Objective	Project stage	Mitigation and management measures and principles	Compliance	Comments
Reduce the emissions of GHGs as a result of green hydrogen production from solar energy.	- Operation	- The purpose of the GHDP should remain throughout to produce green hydrogen by mainly using electricity generated from a renewable energy source.	- Compliant	- The GHDP relies 100% on solar energy (i.e. not reliant on energy supply from an overhead grid or external electricity source).
Heritage/paleontological resources				
Reduce the potential impact on areas of archaeological/paleontological resources.	- Construction and operations	- Contractors and personnel involved in clearing and earthworks should be required to participate in training and awareness programs to ensure that they are aware of work stoppage and reporting procedures should archaeological sites or graves be exposed during development activities. Findings should be reported to the foreman who should then: - Report findings, site location and actions taken to superintendent. - Cease any works in immediate vicinity. Action by superintendent: - Visit the site and determine whether work can proceed without damage to findings. - Determine and mark exclusion boundary.	- Compliant	- The previous ground contractor encountered holding containers with military mortars. The military was commissioned to site to collect the chance finds. The site walkover was conducted by JTC Explosives & Advisory Services for an assessment and clear the site. - The Proponent intends to follow the Chance Finds Procedure should any new findings be

Objective	Project stage	Mitigation and management measures and principles	Compliance	Comments
		- Site location and details to be added to geographic information system (GIS) for field confirmation by archaeologist who should: - Inspect site and confirm addition to GIS. - Advise the National Heritage Council (NHC) and request written permission to remove findings from work area. - Recover, package and label findings for transfer to National Museum. - In the event of discovering human remains: - Actions as above. - Field inspection by archaeologist to confirm that remains are human. - Advise and liaise with NHC and the Namibian Police; and - Recover remains and removes to National Museum or National Forensic Laboratory, as directed.		uncovered throughout the Project phases.
Flora				
Reduce the potential impact on flora.	- Construction and operations	- Development footprint: - Vegetation clearance shall be kept to a minimum and all activities must be contained within the Project footprint to minimise disturbance outside these areas. - Vehicles must be restricted to travelling on designated access roads to limit the ecological footprint of the proposed activity.	- Compliant	- This component of the EMP has been met, as the site is accessed via a constructed access road and the site is positioned adjacent to the D1986 road.
		Weed control and management:	- Compliant	

Objective	Project stage	Mitigation and management measures and principles	Compliance	Comments
		○ Implement an alien invasive species management plan. ○ Removal of the alien and weed species encountered on the property must take place in order to comply with existing legislation. ○ Care should be taken with the choice of herbicide to ensure that no additional impact and loss of indigenous plant species occur due to the herbicide used. ○ Removal of species should take place throughout the construction and operational phases. ○ Sourcing of fill material should be sourced from weed free areas to minimise the risk of spreading alien invasive species and to reduce ongoing alien vegetation removal. ○ Construction vehicles and equipment (including construction material) should be free of plant material when leaving the site to avoid road reserve contamination.		- Indigenous vegetation is used for landscaping purposes. - No invasive species have been identified since Project commencement. - The Project site is sparsely vegetated. Therefore, no removal of trees or use of weed control measures were required during the construction and operational phases.
		- Rehabilitation: ○ All disturbed habitat areas must be rehabilitated as soon as possible to ensure that floral ecology is re-instated.		
		- Floral: ○ Sensitive floral species, if encountered, must be rescued and relocated. The following should be ensured:		

Objective	Project stage	Mitigation and management measures and principles	Compliance	Comments
		○ If any threatened species, or nationally or provincially protected floral will be disturbed, ensure effective relocation of individuals to suitable similar habitat. ○ All rescue and relocation plans should be overseen by a suitably qualified specialist.		
		- All sensitive open space areas will be demarcated and access into these areas shall be prohibited.		
Fauna				
	- Construction and operations	- The proposed development footprint areas should remain as small as possible and be confined to already disturbed areas within the Project area. - No trapping or hunting of fauna is to take place.	- Compliant	- No fauna species have been trapped on site and Project activities are conducted within the fenced Project footprint (Figure 9).
	- Construction	- Designate the eroded granite ephemeral riverbank to the east (E) of the GHDP area as a no-go area. - Do not leave an open trench overnight. - Have regular exists along the trench route, especially at the two ends of the trench. - Rehabilitate disturbed areas incrementally and as soon as possible, not necessarily waiting until completion of the construction phase.	- Compliant	- All construction materials were removed from the Project footprint, and the area was cleaned and cleared of debris.
	- Construction and operations	- Edge effects of all construction and operational activities, such as erosion and alien plant species proliferation, which	- Compliant	- No sensitive habitats have been identified.

Objective	Project stage	Mitigation and management measures and principles	Compliance	Comments
		may affect faunal habitat, need to be strictly managed in disturbed areas. - Should any species of conservational concern be noted within the study area, these species should be relocated to similar habitat within or in the vicinity of the study area with the assistance of a suitably qualified specialist. - All informal fires in the vicinity of construction areas should be prohibited. - It is recommended that a speed limit of 40 km/h (or limit as determined by a risk assessment) is implemented on all roads running through the study area during the construction phase in order to minimise risk to fauna from vehicles.		- No poaching incidents or faunal fatalities were recorded during the period under review. - Speed limit of 30 km/h is enforced onsite to avoid road accidents (Figure 10).
Visual				
Reduce the potential visual impact as a result of movement of machinery, the establishment of infrastructure and dust generation.	- Construction and operations	- The number of construction vehicles and machinery to be used shall be kept to a minimum. - Site clearance shall be kept to a minimum and limited to the footprint of Project area. - Where required, all lighting shall be kept to a minimum within the requirements of safety, security and efficiency.	- Compliant	- A complaints register is maintained for any complaints from the community to be logged, investigated and, if appropriate, acted upon. - The site structures such as prefabricated offices are not a significant visual nuisance.

Objective	Project stage	Mitigation and management measures and principles	Compliance	Comments
				- All Project activities were conducted with the boundary of Portion 8 of Farm 58.
	- Construction and decommissioning	- Stockpiles will be kept at a height consistent to the surrounding environment.	- Compliant	- The site structures such as prefabricated offices are not a significant visual nuisance.
		- Construction camps will be demarcated. All material stockpiles created during the construction phase will be screened from the public when not in use.		
		- Construction camps should not be erected in the area east of the project site.		
	- Decommissioning	- The footprint area of the decommissioning activities must be landscaped to represent the surrounding natural environment. Landscaping must be conducted so that pooling of water does not occur.	- Non-applicable	- The decommissioning phase is not yet commenced as the Project is still in the operations phase.
		- Disturbed areas will be top soiled in order to promote vegetation growth. Seeding of indigenous species will be conducted should natural succession not establish.		
	- Construction and operations	- Areas east of the Project site should be demarcated as no-go areas.	- Compliant	- All Project activities were conducted within the Project footprint. The project architectural design
		- An aesthetical committee will be established to ensure adherence to architectural design guidelines and landscape architectural design guidelines.		

Objective	Project stage	Mitigation and management measures and principles	Compliance	Comments
				matches the overall landscape.
	- Construction, operation and decommissioning	- Wind erosion control measures including silt fences (especially on exposed slopes) should be implemented.	- Compliant	- The Proponent has adhered to this mitigation and management measure.
		- Landscape and building maintenance should be ensured.		
	- Construction and operations	- The training centre, 350 bar dispensers and related shade canopy structure will have well-articulated architectural designs that will blend into the desert landscape.	- Compliant	- No complaints were received from Walvis Bay International Airport, Dune 7 Adventures or any other stakeholders regarding visual disturbances.
		- Fences and wall designs should avoid reflective material with a target specification for textured matt-coloured dark natural materials, tone paint colours and limited mild steel fixings.		
		- Vertically mounted structures such as water tanks and the low-pressure buffer tank should avoid light or reflective material and should rather target textures and matt coloured dark natural tone paint colours.		
		- Regarding horizontally mounted structures, the following mitigation measures are proposed: - Process and power containers (avoid reflective material. Target a specification for textures matt coloured dark natural tone paint colours) - Compressor (avoid reflective material. Target a specification for textures matt coloured dark natural tone paint colours)		

Objective	Project stage	Mitigation and management measures and principles	Compliance	Comments
		300 bar buffer (avoid reflective material. target a specification for textures matt coloured dark natural tone paint colours) 500 bar storage tanks (avoid reflective material. Target a specification for textures matt coloured dark natural tone paint colours) - Tube trailers bays (avoid reflective material. Target a specification for textures matt coloured dark natural tone paint colours).		
Reduce the glint and glare impacts originating from the solar PV panels.	- Construction and operations	- A low stone wall should at as a visual buffer around the solar PV farm footprint.	- Non-applicable	- The project architectural design matches the overall landscape and has not received any complaints regarding the PV plant.
	- Construction	- The total height of the solar PV panels and associate platforms should not exceed 2 m height above natural ground level.	- Compliant	- The Proponent complied with this condition set out in the EMP.
	- Construction and operations	- Ocular analyses of glint and glare should be conducted.	- Compliant	- These design criteria and requirements were adhered to. No complaints were
		- Solar PV panels will be used with a special anti-reflective (AR) coating.		
		- Glass surfaces on the solar PV panels should be textured.		

Objective	Project stage	Mitigation and management measures and principles	Compliance	Comments
				received from Walvis Bay International Airport, Dune 7 Adventures or any other stakeholders regarding visual disturbances.
Noise				
Reduce the potential generation of nuisance noise.	- Construction and operations	- Correct PPE must be worn at all times by the personnel on the construction site.	- Compliant	- The appropriate PPE was worn onsite (Figure 9).
		- Adhere to local regulations regarding the generation of noise and hours of operation.		- No occupational injuries were reported during the period under review.
		- Muffling units on vehicles and equipment must be kept in good working order.		- The Proponent has developed an inspection and maintenance plan for all Project equipment and machinery.
		- All equipment must be kept in good working order, with immediate attention being paid to defective silencers, slipping fanbelts, worn bearings and other sources of noise.		- No noise complaints were received from the surrounding noise
		- Equipment must be operated within specifications and capacity (e.g., no overloading of machines).		
		- Regular maintenance of equipment must be undertaken.		
		- Equipment shall be switched off when not in operation.		

Objective	Project stage	Mitigation and management measures and principles	Compliance	Comments
				sensitive receptors (NSRs) during the period under review.
Soils, land use and land capability				
Reduce the potential impact on soils, land use and land capability as a result of compaction, clearing of vegetation and improper storage and handling of oils, fuels and other hazardous substances.	- Construction and decommissioning	- When mortar is used onsite, the following guidelines apply: - o Carefully control all on-site operations that involve the use of mortar and concrete. - o Limit mortar mixing to single sites, where possible. - o Use plastic trays or liners when mixing mortar and concrete: Do not mix mortar and concrete directly on the ground. - o Dispose of in the approved manner.	- Compliant	- This component of the EMP was adhered to.
	- Construction and operations	- No waste or spillage of effluent should be allowed to occur within or near sensitive habitat boundaries.	- Compliant	- Following one (1) minor oil spill occurred, the contaminated soil was rehabilitated accordingly. - No further reportable spills were recorded during the period under review.
		- A pollution control system/spill handling procedure must be implemented to limit impact of such occurrences and prevent discharge to the receiving environment.		
		- Contaminated soil shall be removed and disposed of to an appropriate licensed landfill site.		
		- No field maintenance of equipment shall be permitted, except for emergency repairs.		
		- Drip trays shall be used when dispensing fuel or oils from the earthmoving equipment outside designated areas.		
		- Drip trays shall only be emptied into a dedicated container.		

Objective	Project stage	Mitigation and management measures and principles	Compliance	Comments
		- Erosion control measures shall be implemented where deemed necessary.		
		- Prevent erosion from stockpiles to prevent increase in turbidity of watercourses.		
		- Stockpiles shall be maintained until the topsoil is required for rehabilitation purposes.		
		- All erosion damage must be repaired as soon as possible.		
		- Tarpaulins will be placed on the ground to prevent oil, grease, hydraulic fluid and diesel spills during emergency repairs.		
	- Decommissioning	- The footprint area of the decommissioning activities must be landscaped to represent the surrounding environment. Landscaping must be done so that pooling of water does not occur.	- Non-applicable	- The Project is currently in the operations phase. - The Proponent shall comply with the mitigation and monitoring schedule as stipulated in the updated ESMP (2026) when the Project transitions into the decommissioning phase.
		- Demolish and remove all infrastructure not required post-closure.		
		- Should there be reason or suspect reason that the soils are contaminated following decommissioning activities, the soils will be assessed by a competent person and remediated by Cleanergy within a reasonable timeframe.		
Traffic				

Objective	Project stage	Mitigation and management measures and principles	Compliance	Comments
Reduce the potential impact on traffic as a result of increased vehicle numbers and the impact on road degradation.	- Construction and operations	- Speed limits will be reduced to 40 km/h (or speed limit determined after risk evaluation) to reduce dust and noise generation.	- Compliant	- Vehicle speed limit (30 km/h) signage is erected on site (Figure 10) and Project vehicles are regularly maintained and serviced.
		- Where possible the transportation of construction materials and rubbish shall be undertaken outside traffic peak hours to minimise inconveniencing other road users.		
		- All the construction vehicles shall undergo maintenance on a regular basis to ensure the combustion engine vehicle efficiency.		
Hazardous materials				
Reduce the potential environmental impact as a result of poor hazardous material management practices.	- Construction	- Commissioning of the tanks will only occur once a leak test certificate has been issued	- Compliant	- The Proponent complied with this component of the EMP.
	- Construction, operation and decommissioning	- Establish delivery procedures to ensure that hazardous materials are handled with care and stored correctly.	- Compliant	- The fuel storage area during construction was lined with an impervious liner, indoors and away from harsh climatic conditions. The valves were kept properly closed.
		- Ensure that subcontractors and delivery companies are informed of delivery procedures and are made aware of restrictions, in terms of where materials can be stored/placed.		
		- An appointed representative of the contractor must supervise all deliveries, particularly those of a hazardous nature.		
- The valves of cylinders, both full and empty, must be kept properly closed.		- There was a spill kit kept onsite (refer to		

Objective	Project stage	Mitigation and management measures and principles	Compliance	Comments
		- Where extreme temperatures prevail (>60 °C Cylinder Surface Temperature), cylinders shall be stored so that they are protected from the direct rays of the sun.		Figure 5) and instructions of utilisation thereto.
		- Cylinders shall always be handled, stored, used and transported upright. They shall not be dropped, dragged or rolled on their sides or allowed to skid. Cylinders that are too large to be carried shall be tilted and rolled on the rims of their foot rings or bases.		- The fuel storage capacity was 400 litres (L) and therefore did not require a consumer installation certificate from the Ministry of Industries, Mines and Energy (MIME).
		- Cylinders should always be stored in a well-ventilated area, chained and away from sparks, flames or any source of heat or ignition.		- Signage on containers as well as near the well-ventilated storage space were present (Figure 5).
		- All combustible materials to be a radius of 3 m away from any gas storage areas. In the case of any flammable or any other gas storage areas, open flames, welding and cutting operations, smoking etc., shall be prohibited in or near the storage area.		
		- Erect suitable warning and information signage near the storage facility.		
	- Operations	- The tanks are to be fitted with high level alarms. These alarms are activated when product filling approaches the maximum capacity of the tank allowing sufficient time for transfer of product into the tank to be stopped.	- Compliant	- During operations, precautions were taken to prevent contamination of the surrounding environment.

Objective	Project stage	Mitigation and management measures and principles	Compliance	Comments
				- No contamination incidents were reported during the period under review.
	- Construction and decommissioning	- The contractor shall not be released from site until the HSE and Project Manager has signed off the release documentation and is satisfied with the contractor’s adherence to the EMP and EA.	- Compliant	- An inventory was maintained along with the respective MSDS.
		- All workers that have completed the induction should sign that they have understood and will implement the measures required.		- The Proponent shall ensure that these measures are implemented during the decommissioning phase.
		- An inventory of all chemicals on site must be kept together with the respective MSDSs.		
Waste management				
Reduce the potential environmental impact as a result of poor waste management practices.	- Construction and operations	General: - No soil, rubble or any other material may be deposited in or within 32 m of any watercourse/wetland. - Sufficient bins/skips are to be provided for the safe and environmentally responsible disposal of waste. - Littering on site is forbidden and the site must be cleared of litter at the end of each working day. - Where possible, materials used or generated by construction activities must be recycled.	- Compliant	- A register of waste produced, and disposal methods were maintained. - All solid waste, including domestic and office refuse and scrap metal, plastic, and wood, was contained

Objective	Project stage	Mitigation and management measures and principles	Compliance	Comments
		Waste generated on the proposed site should be collected by authorised waste contractors and frequently disposed of at a licenced landfill site.		on site in a designated area and recycled where feasible, with disposal undertaken by the appointed contractor at a licenced waste disposal facility. - Different coloured waste bins were kept onsite throughout construction, and this practice is currently maintained during operations (Figure 3 and Figure 11). - Portable toilets were used during the construction phase and were emptied twice a week.
		Separation of waste: - All waste shall be separated into general waste and hazardous waste. - Hazardous waste shall not be mixed with general waste. Quantities of hazardous waste to be managed. - General waste could further be separated in waste that can be recycled and/or reused. - No littering shall be allowed in and around the site, a sufficient number of bins shall be provided for the disposal of waste. - Where necessary dedicate a storage area on site for collection of construction waste.		
		Storage of waste: - General waste will be collected in an adequate number of litter bins located throughout the construction site. - Bins must have lids in order to keep rainwater out. - Bins shall be emptied regularly to prevent the bins from overflowing. - All work areas shall be kept clean and tidy at all times. - All waste management facilities will be maintained in good working order.		

Objective	Project stage	Mitigation and management measures and principles	Compliance	Comments
		- Waste shall be stored in demarcated areas according to type of waste. - Runoff from any area demarcated for waste will be contained and managed. - Flammable substances must be kept away from sources of ignition and from oxidizing agents. - No builder's rubble shall be disposed of to the riparian area. - If buildings rubble is not removed immediately, it shall be stockpiled outside the 1:50 year floodline and outside the sensitive riparian areas. - Demolition waste and surplus concrete shall be disposed of responsibly. - Waste shall not be buried or burned on site.		
		Disposal of hazardous waste: - No indiscriminate dumping shall be allowed in or near the construction site. - Hazardous containers shall be disposed of at an appropriate licensed site. - Hazardous waste will be removed and managed by an approved service provider. - A safe disposal certificate will be provided by the approved service provider as proof of responsible disposal of hazardous waste.		

Objective	Project stage	Mitigation and management measures and principles	Compliance	Comments
		○ The safe disposal certificate shall be stored and provided on request.		
		Disposal of general waste: ○ No dumping shall take place in or near the construction site. ○ All general waste shall be disposed of to a licenced landfill site. ○ Demolition waste and building rubble shall be disposed of to an appropriate licenced landfill site.		
General				
Impacts on Walvis Bay International Airport.	- Construction and operations	- Ensure airport utilities are not damaged during construction.	- Compliant	- The Proponent maintains communication and engagements with the Walvis Bay International Airport. - No damages related to the airport has been recorded to date.
		- The GHDP should communicate emergency response plans with the Walvis Bay International Airport in case of an aircraft crash, etc. - Sufficient bins/skips are to be provided for the safe and environmentally responsible disposal of waste.		

4 CONCLUSION

No environmental issues, social issues or major EMP non-compliance were identified/reported during the period under review. All Project activities were undertaken in accordance with the prescribed environmental management measures of the 2022 EMP. The Proponent further demonstrated good compliance with the conditions of the approved environmental clearance certificate through the ongoing submission of bi-annual environmental reports to MEFT. This consistent reporting and adherence to EMP requirements indicate effective environmental management and responsible Project implementation.

The EMP of 2022 has been revised and updated into an ESMP (2026) (Appendix D) to include the renewal activities as well as the environmental and social aspects associated with the proposed GHDP infrastructure upgrades.

Upon renewal of the environmental clearance certificate, the Proponent shall continue to comply with all reporting requirements prescribed by MEFT. Project personnel shall maintain strict adherence to all applicable environmental legislation, licence conditions, approved management plans, internal SOP's and industry best practices. The Proponent shall also maintain ongoing engagement the interested and affected parties (I&APs) and stakeholders such as the Walvis Bay International Airport, Dune 7 Adventures and the Walvis Bay Municipality.

APPENDIX A – ENVIRONMENTAL CLEARANCE CERTIFICATE FOR THE GHDP

APPENDIX B – ENVIRONMENTAL MANAGEMENT PLAN (2022)

APPENDIX C – BI-ANNUAL ENVIRONMENTAL REPORTS

APPENDIX D - UPDATED ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN