



KARIBIB
FUEL CENTRE

Submitted to: Karibib Fuel Centre CC
Attention: Mr. AJ Stadler
P.O. Box 106
Karibib
Namibia

REPORT:

DRAFT ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN - FUEL SERVICE STATION ON ERF 1204, EXTENSION 4, KARIBIB

PROJECT NUMBER: ECC-179-706-REP-02-A

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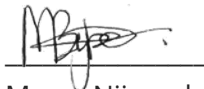
We welcome any enquiries regarding this document and its content. Please contact:



Environmental Compliance Consultancy (Pty) Ltd
PO Box 91193, Klein Windhoek, Namibia
Tel: +264 81 669 7608
Email: info@eccenvironmental.com

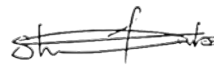
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Authors:



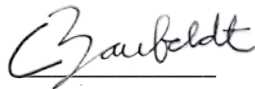
Mercy Niigambo
Environmental Compliance Consultancy

Checked By:



Samuel Shinyemba
Environmental Compliance Consultancy

Approved By:



Carlene Baufeldt
Authorised representative
Environmental Compliance Consultancy

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ABBREVIATIONS

Abbreviation	Description
>	greater than
CC	close corporation
DEAF	Department of Environmental Affairs and Forestry
DWA	Department of Water Affairs
Erf	A piece of land or plot within a residential, commercial area or mixed-use area that is formally registered and surveyed. Each plot is assigned a unique number which distinguishes it from other properties for the purpose of town planning, land administration, ownership registration and the assessment of property rates and taxes.
ECC	Environmental Compliance Consultancy (Pty) Ltd
e.g.	for example
EMA	Environmental Management Act, No. 7 of 2007
ESIA	environmental and social impact assessment
ESMP	environmental and social management plan
GIS	geographic information system
GPS	global positioning system
i.e.	that is
KTC	Karibib Town Council
L	litre
Ltd.	limited
m ²	square metres
MSDS	material safety data sheet
MAFWLR	Ministry of Agriculture, Fisheries, Water and Land Reform
MEFT	Ministry of Environment, Forestry and Tourism
MIME	Ministry of Industries, Mines and Energy
MLIREC	Ministry of Labour, Industrial Relations and Employment Creation
NHC	National Heritage Council
NSRC	noise sensitive receptors
PPE	personal protective equipment
Pty	proprietary
Q4	quarter four

1 INTRODUCTION

1.1 PROJECT BACKGROUND

Environmental Compliance Consultancy (Pty) Ltd (ECC) has been engaged by Karibib Fuel Centre CC (hereafter referred to as "the Proponent") to develop a comprehensive draft environmental and social management plan (ESMP) and apply for the environmental clearance certificate for the proposed construction and operation of a fuel service station on Erf 1204, Extension 4, Karibib, Erongo Region, Namibia (Figure 1 and Figure 2). The Project footprint (i.e. Erf 1204) is approximately 25 392 square metres (m²) in size.

Extension 4 is planned to undergo a rezoning process for commercial, mixed use and residential development. The consent for the rezoning application was submitted to the Karibib Town Council (KTC) in quarter four (Q4) of 2025 and is pending approval.

1.2 PROJECT SCOPE OF WORK

The Proponent proposes to construct and operate a fuel service station along with associated infrastructure such as a retail shop, food takeaway outlet and a carwash facility.

The construction phase will entail the clearing, levelling and grading of the Project footprint. Civil works will be undertaken for the underground fuel storage tanks, drainage systems, concrete slabs for the canopy, kiosk and carwash facility. Key service amenities will include fuel pumps and dispensers, piping, electrical systems, ablution facilities and waste management amenities. The Project will be tied into Karibib's existing municipal services (i.e. connection to the power grid, water supply and wastewater systems). During the construction phase, appropriate environmental and occupational health and safety measures will be implemented to minimise the likelihood of potential impacts on the receiving environment and surrounding social receptors. The phase will conclude with the pressure testing of fuel storage tanks and dispensing pumps, all safety systems and emergency response procedures.

The key operational activities will include the safe dispensing of fuel from underground storage tanks, regular monitoring of fuel levels, customer services (i.e. fuel attendants assisting customers with refuelling and process payment), upkeep of ablution facilities, waste management and conducting routine inspections of underground fuel storage tanks to timely detect leaks or equipment malfunction.

1.3 PRELIMINARY PROJECT PLANNING HIGHLIGHTS

1.3.1 ESIA SCREENING EXERCISE

ECC conducted a preliminary screening exercise to assess the potential environmental and social impacts likely associated with the proposed Project. The findings indicate that the Project

footprint is relatively small (25 392 m²) and therefore its construction and operational activities are expected to have minimal to low environmental and social impacts.

Considering the anticipated limited scale and low-impact nature of the potential impacts and the absence of any sensitive or high-risk environmental receptors within or adjacent the Project site, ECC has determined that a full environmental and social impact assessment (ESIA) is not warranted at this stage. Additionally, no comprehensive specialist studies are required. To this effect, a scoping plus impact assessment study has been conducted to support the environmental clearance certificate application.

This draft environmental and social management plan (ESMP) has been developed to provide a comprehensive framework which outlines the best environmental practices, practical mitigation measures and monitoring protocols to be implemented throughout the Project phases. The primary objective is to preserve the receiving environment and its ecological functions. Through proactive management, the draft ESMP also seeks to minimise the potential environmental impacts and ensure that any impacts arising as a result of the operational activities are effectively controlled and mitigated. In addition to environmental protection, the draft ESMP takes into consideration the local social receptors to ensure the proposed Project activities do not severely impact their livelihoods.

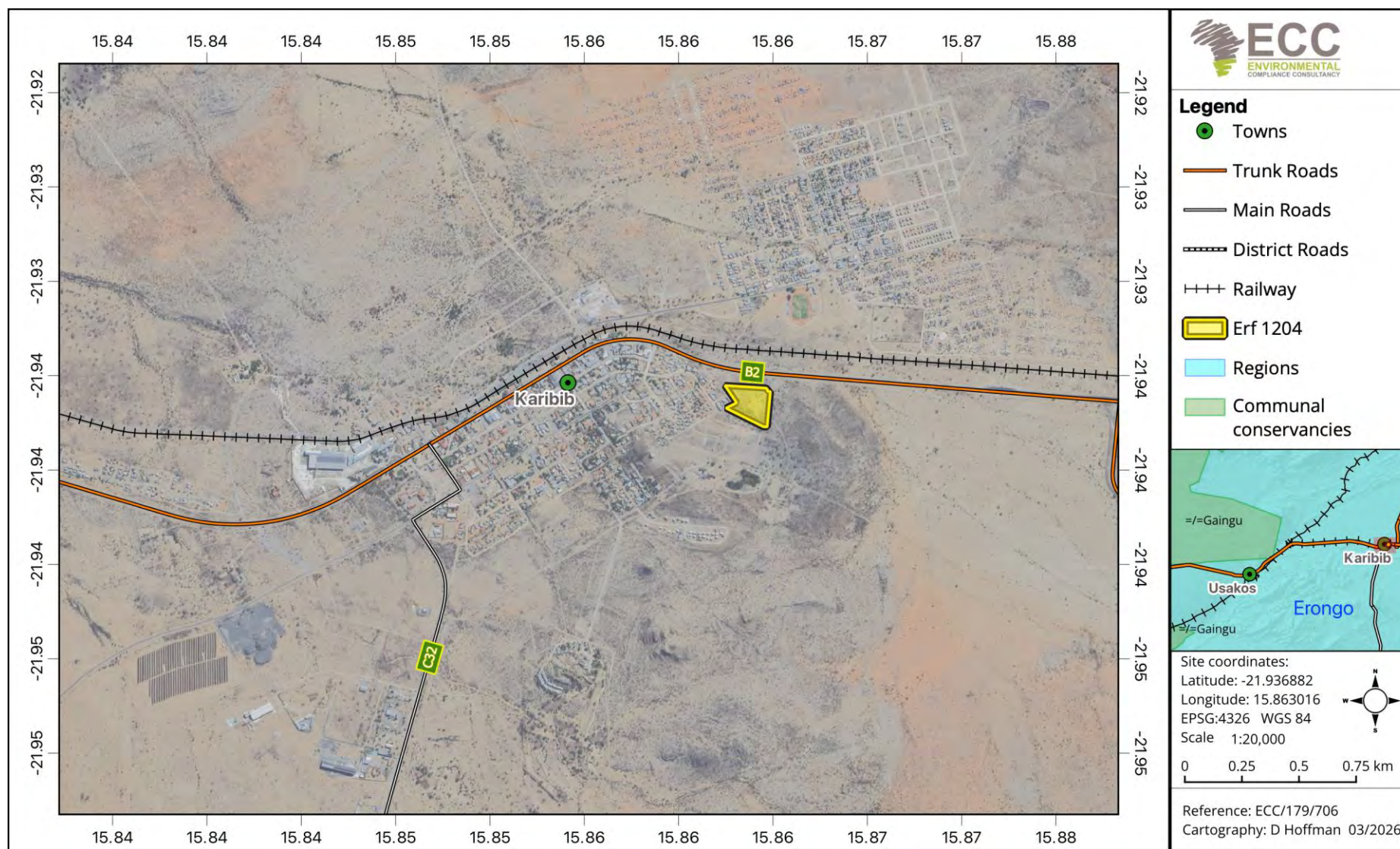


Figure 1 – Locality map of the Project site (Erf 1204)

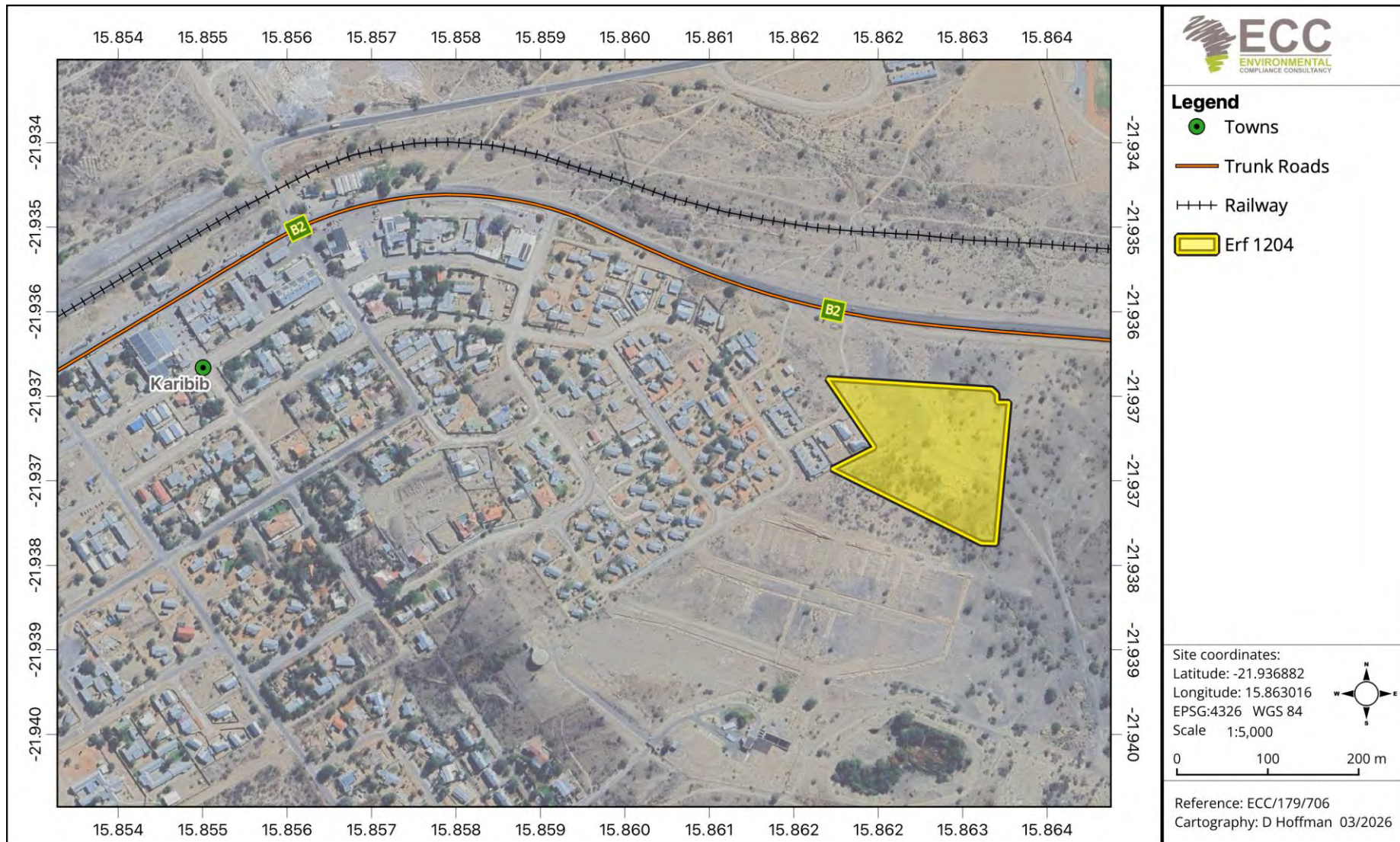


Figure 2 - Satellite view of the Project site (Erf 1204)

1.4 ENVIRONMENTAL REGULATORY REQUIREMENTS

The construction and operation of a fuel service station is listed under the Environmental Management Act, No. 7 of 2007 (EMA) and its 2012 Regulations, and therefore cannot be undertaken without obtaining an environmental clearance certificate, issued by the Department of Environmental Affairs and Tourism (DEAF) within the Ministry of Environment, Forestry and Tourism (MEFT). In addition to this, the Proponent is required to obtain a consumer installation certificate for the bulk storage (> 200 litres (L) of fuel) and dispensing of fuel within a local authority and a retail licence for the sale of fuel, in accordance with the Petroleum Products and Energy Act, No. 13 of 1990 and the Petroleum Products Regulations of 2000. These should be obtained from the Ministry of Industries, Mines and Energy (MIME).

This draft ESMP has been prepared in terms of the requirements of the EMA and its 2012 Regulations.

1.5 PURPOSE OF THIS REPORT

This draft ESMP provides a logical framework, mitigation measures, management strategies and monitoring requirements for the Project and its associated construction, operational and decommissioning activities. This ensures that the potential environmental impacts and social issues are curbed and minimised as far as practically possible and that statutory and other legal obligations are adhered to and fulfilled. Outlined in the draft ESMP are the protocols, procedures and roles and responsibilities to ensure the management arrangements are effectively and appropriately implemented.

This draft ESMP is a live document and shall be reviewed at predetermined intervals, and or updated when or if the scope of work alters, when information is added or when unforeseen environmental and social impacts have been identified. All Project staff members and appointed contractors and their subcontractors will be legally required to comply with the requirements set out in this draft ESMP, once approved by the MEFT.

1.6 MANAGEMENT OF THIS DRAFT ESMP

The Proponent will hold the environmental clearance certificate for the Project and will be responsible for the implementation and management of this draft ESMP. The implementation and management of this draft ESMP and thus the monitoring of compliance, will be undertaken through daily duties and activities, as well as monthly inspections. All Project personnel throughout all the Project phases are expected to comply with the requirements stipulated in this draft ESMP.

1.6 LIMITATIONS, UNCERTAINTIES AND ASSUMPTIONS RELATED TO THIS DRAFT ESMP

Where there is any conflict between the provisions of this draft ESMP and any contractor's obligations under their respective contracts, including statutory requirements (such as licences, Project approval conditions, permits, standards, guidelines and relevant laws), the contract should be amended, and statutory requirements are to take precedence.

The information presented in this draft ESMP is based on the scope of work, compiled in consultation with the Proponent. However, when the design, operation method changes or expansion works are proposed, this draft ESMP will need to be updated, and additional assessment may be required.

1.7 ENVIRONMENTAL ASSESSMENT PRACTITIONER (EAP)

This report has been prepared by Environmental Compliance Consultancy (Pty) Ltd (ECC) (Reg. No. 2022/0593) on behalf of the Proponent. Authored by ECC employees with no material interest in the report's outcome, ECC maintains independence from the Proponent and has no financial interest in the Project apart from fair remuneration for professional fees. Payment of fees is not contingent on the report's results or any government decision. ECC members or employees are not, and do not intend to be, employed by the Proponent, nor do they hold any shareholding in the Project. Personal views expressed by the writer may not reflect ECC or its client's views. The environmental report's information is based on the best available data and professional judgment at the time of writing. However, please note that environmental conditions can change rapidly, and the accuracy, completeness, or currency of the information cannot be guaranteed.

All compliance and regulatory requirements regarding this report should be forwarded by email or posted to the following address:

Environmental Compliance Consultancy (Pty) Ltd
PO Box 91193, Klein Windhoek, Namibia
Tel: +264 81 669 7608
Email: info@eccenvironmental.com

2 ENVIRONMENTAL MANAGEMENT FRAMEWORK

2.1 OBJECTIVES AND TARGETS

The Project site is located within a pre-disturbed townland environment. The broader area is predominantly characterised by a mix of municipal infrastructure, roads and transport infrastructure, privately owned businesses and residential developments. To prevent and mitigate potential adverse environmental and social impacts, specific environmental and social objectives and targets have been developed. These are developed to ensure that all Project activities are conducted in a manner that minimise potential impacts on both the receiving environment and surrounding social receptors.

The overall environmental and social objectives for the Project are as follows and must align with KTC strategic corporate environmental and social objectives for new developments:

- Manage waste efficiently and reduce the potential for environmental pollution;
- Use natural resources effectively and efficiently;
- Prevent, control and manage spills and leaks of petroleum products to minimise soil and water resources contamination;
- Align the Project operations with the KTC environmental policies and guidelines;
- Resolve complaints received from the surrounding community and business owners through effective grievance resolutions mechanisms;
- Engage in best environmental practices throughout the Project's lifespan, including routine inspections of underground fuel storage tanks, piping and dispensing pumps to ensure malfunctions are detected timely and leakage are timely addressed; and
- Comply with safety standards and conditions of all permits, licences and certificates issued for the Project.

2.2 ORGANISATIONAL STRUCTURE, ROLES AND RESPONSIBILITIES

The Proponent shall be responsible for:

- Ensuring that all Project staff members, appointed contractors, subcontractors and customers comply with the procedures set out in this draft ESMP;
- Ensuring that all personnel receive adequate supervision and instruction to effectively implement the requirements stipulated in this draft ESMP;
- Ensuring that any person allocated specific environmental responsibilities is formally notified of their appointment and confirms that their responsibilities are clearly understood;
- Monitoring and evaluating the implementation of the draft ESMP to ensure continuous improvement and compliance throughout the Project's lifespan;
- Keeping records of environmental incidents, corrective actions and induction activities for audit and reporting purposes;

- Promoting a culture of environmental awareness and accountability among all staff, contractors and visitors through ongoing communication and engagement; and
- Upholding the Project's reputation by ensuring timely reporting of environmental incidents to the relevant regulatory authorities.

Table 1 outlines the key roles and responsibilities assigned to the Project team members tasked with executing Project activities in compliance with the draft ESMP requirements.

Table 1 - Project team roles and responsibilities

Role	Responsibilities and duties
Proponent	- Responsible for the overall management and implementation of this draft ESMP; - Ensure site specific environmental policies are drafted/updated and communicated to all Project personnel; - Responsible for providing the resources required to effectively run operations and comply with the draft ESMP; and - Appoint all Project team members that are required to ensure effective running of operations.
Operations manager or appointed representative	- Responsible for overseeing and supervising the day-to-day operations of the fuel service station to ensure compliance with this draft ESMP; - Take over the assigned responsibilities of the health, safety and environmental (HSE) representative during operations; - Ensure all personnel are aware of the commitments made in the draft ESMP and statutory licence and permit conditions approved for the Project; - Responsible for the overall management and revision of this draft ESMP. The frequency of review and updates shall be determined based on any material changes to the Project scope or other relevant developments; - Ensure adequate resources are made available for personnel to effectively implement commitments made in this draft ESMP; - Provisioning of environmental awareness/management training and inductions for all employees; - Ensure that best environmental practices are implemented throughout the Project lifecycle; - Receiving, recording and responding to community complaints; - Conduct the required compliance inspections and/or audits to ensure compliance with the draft ESMP and conditions of the approved environmental clearance certificate; and

Role	Responsibilities and duties
	- Report any non-compliance or accidents to stakeholders and regulatory authorities (e.g. MEFT, MIME, Ministry of Agriculture, Fisheries, Water and Land Reform (MAFWLR), Ministry of Labour Industrial Relations and Employment Creation (MLIREC) and National Heritage Council (NHC)).
HSE appointed representative (construction phase only)	- Responsible for conducting regular site inspections to identify environmental, health and safety and ensure that mitigation measures are effectively implemented; - Ensure all contractors, subcontractors and visitors comply with site-specific HSE procedures, permit conditions and relevant legal requirements; - Ensure that appropriate personal protective equipment (PPE) is available, used correctly and maintained by all construction personnel; - Record, investigate and report all environmental incidents, spills, injuries, near misses and non-conformances, and recommend corrective and preventive actions; - Maintain HSE records, inspection reports, incident registers and other documentation required to demonstrate compliance with the draft ESMP and applicable legislation; - Liaise with the Proponent, Operations Manager, contractors and relevant regulatory authorities regarding HSE matters where required; and - Stop or recommend the suspension of any construction activity that poses an immediate risk to human health, safety or the environment until appropriate corrective measures have been implemented.
Project employees, maintenance team, contractors and subcontractors	To comply with this draft ESMP throughout the Project lifecycle, in addition to: - Demonstrating an understanding of the draft ESMP, including its content and requirements; - Attending briefings and training sessions on specific environmental matters; - Report any construction or operational activities that deviate from the draft ESMP; and - Timely implement corrective or remedial actions as directed by the Proponent or Operations manager.

2.3 CONTRACTORS AND SUBCONTRACTORS

Contractors and their subcontractors contracted by the Proponent for construction work, any mechanical repairs or maintenance work must be compliant with this draft ESMP and shall be responsible for the following:

- Undertake activities in accordance with this draft ESMP, as well as relevant policies, procedures, management plans, method statements, licences and contract obligations;
- Implement effective environmental and safety management measures;
- Adopt environmental best practices to ensure the preservation of the receiving environment and minimise potential environmental impacts to the greatest extent possible;
- Report environmental issues, including actual or potential environmental incidents and aspects to the Proponent and Operations manager;
- Cooperate fully with environmental inspections, internal and external auditors and monitoring activities conducted by the Proponent, Operations manager or regulatory authorities;
- Ensure that employees under their employment are made aware of, and comply with the requirements of this draft ESMP; and
- Ensure that appropriate corrective or remedial actions are implemented to address all environmental aspects and incidents. Lessons learnt should always be documented for future reference and continuous improvement.

2.4 WORKFORCE COMPETENCY

Any personnel employed by the Proponent shall be competent to perform tasks that have the potential to cause an environmental or social impact. In this instance, competence is defined in terms of appropriate vocational training, customer service and prior work experience.

The Proponent shall comply with the Republic of Namibia's Regulations for Labour, Health and Safety and any subsequent amendments to these Regulations. The following conditions, amongst others must be complied with:

- All Project personnel shall be provided with the necessary uniforms and appropriate personal protective equipment (PPE) (e.g. safety boots);
- Should foreign workers be hired, the Proponent shall ensure that they have valid work permits at all times;
- Occupational health and safety protocols are to be enhanced throughout the Project lifecycle; and
- All Project personnel shall undergo an induction course covering occupational safety procedures and site-specific risks before commencing work.

2.5 EMPLOYMENT

The recruitment approach of the Project workforce shall comply with the following criteria:

- Ensure that local people have access to information regarding job opportunities;
- The number of job opportunities shall be made known together with the associated skills and required qualifications;
- The maximum expected duration of the job, whether temporary or permanent, shall be indicated;
- Foreign workers with no proof of permanent legal residence and work permit shall not be hired; and
- All employees hired must be issued valid employment contracts specifying their position, assigned duties and hourly remuneration (in accordance with the wage standard bracket stipulated in the Wage Order Setting the National Minimum Wage for Employees (Government Notice 218 of 2024)).

3 COMMUNICATION AND AWARENESS

To ensure potential environmental impacts are minimised, it is important that Project personnel are appropriately informed and briefed on how to properly implement the draft ESMP. It is also important that regular communication is maintained with stakeholders and regulatory authorities, where required (i.e. KTC, NHC, MEFT, MAFWLR and MIME). This section outlines the framework for communication related to the implementation of the commitments that are specified in this ESMP.

3.1 INTERNAL COMMUNICATION

The Operations manager shall communicate site-wide environmental issues to the Project team during construction, operations and decommissioning phases through the following means (as and when required):

- WhatsApp group (or preferred social communication mobile application tool);
- Daily, weekly and monthly briefings;
- Instructions on incident response procedure; and
- Briefing on key social and environmental issues.

This draft ESMP shall be distributed to the Project team (including contractors and their subcontractors) to ensure that the environmental requirements are adequately communicated. The key activities and environmentally and socially sensitive operations must be highlighted clearly to workers and contractors, in English and their local language, where required.

Effective communication must be maintained and should include procedures for receiving, logging and resolution of complaints, the non-conformances with this draft ESMP observed and remediation/corrective actions required.

3.1.1 TRAINING AND ENVIRONMENTAL AWARENESS

All Project personnel must be competent to perform tasks to avoid potential negative environmental impacts. Competence is defined in terms of appropriate education, training and work experience. When it has been determined that certain skills are lacking, refresher courses must be offered to the workforce.

3.2 EXTERNAL COMMUNICATION

The public shall be duly informed about the Project. A Project notice board must be erected at the Project site prior to the commencement of the construction phase.

The Operations manager and the Proponent shall represent the Project and shall liaise with external regulatory authorities (e.g. KTC, MEFT, MIME, NHC and MAFWLR). This will ensure good working relations with the stakeholders and compliance with all relevant environmental regulations and the approved licences, certificate and permits for the Project.

3.1.2 ENVIRONMENTAL EMERGENCY AND RESPONSE

An emergency is any abnormal event, which demands immediate attention. It is any unplanned event, which results in the temporary loss of management control at site, but where functional resources can manage the response. An emergency response plan document will be put in place that manages the response in relation to emergencies including environmental emergencies.

Table 2 provides a list of numbers to be contacted in case of an emergency.

Table 2 - Emergency contact details

Town	Ambulance	Police	Fire brigade
Karibib	+264 81 325 4801	+264 64 550 008	+264 81 422 1805

The procedures for reporting of environmental and occupational incidents are discussed in section 4.2 Reporting.

3.1.3 COMPLAINT HANDLING AND RECORDING

Any complaints received verbally by any personnel on the Project site shall be recorded by the receiver including:

- The name of the complainant;
- The contact details of the complainant;
- Date and time the complainant was received; and
- The nature of the complaint.

The information shall be provided to the Operations manager who is overall responsible for managing and responding to complaints. The Operations manager must address the complaints by following these measures:

- Record the complaint in the complaint register; and
- Provide a written response to the complainant of the results of the investigation and action to be taken to rectify or address the matter(s). Where no action is taken, the reasons why are to be recorded in the register.

The Project team shall be informed about the complaints register, its location and the person responsible, to refer the public who wish to lodge a complaint. The complaints register shall be kept for the duration of the Project and must be available for government or public review, upon request.

4 REPORTING, COMPLIANCE AND ENFORCEMENT

4.1 ENVIRONMENTAL PERFORMANCE MANAGEMENT

This section outlines the overall monitoring commitments required for implementation during the construction, operational and decommissioning phases of the draft Project. It details procedures to ensure routine inspections and audits are conducted to ensure that the Project activities are aligned and remain compliant with this draft ESMP.

4.1.1 CONSTRUCTION PHASE: ENVIRONMENTAL INSPECTIONS AND COMPLIANCE MONITORING

A copy of this draft ESMP will be onsite throughout the construction phase and will be available upon request. Contractors and subcontractors must be issued with a copy of this draft ESMP. It is the responsibility of the Proponent and Operations manager to ensure this draft ESMP is complied with throughout the construction phase. Daily and weekly inspections will be undertaken by the Operations manager or appointed representative. Any environmental concern or occupational health and safety incurred must be reported to the Proponent and the regulatory authorities and actioned as soon as reasonably practicable.

4.1.2 OPERATIONAL PHASE: ENVIRONMENTAL INSPECTIONS AND COMPLIANCE MONITORING

An audit and inspection program must be developed to ensure effective operational performance. For example, the fuel levels in the underground storage tanks must be monitored on a defined schedule (daily or weekly) to detect any leakages in the tanks or piping systems. This will ensure leakages and potential surface or groundwater contamination is timely detected and addressed. In addition, the inspection program shall incorporate regular inspection and maintenance of all mechanical and electrical equipment such as pumps, dispensers, pipelines, valves and spill containment systems to ensure timely detection of malfunctions and to minimise environmental impacts and safety risks.

The Operations manager or appointed personnel will conduct regular inspections of all operational work areas to ensure compliance with operational specifications and identify any signs of wear, damage or deterioration. Any non-conformance will be recorded, including the following details: a brief description of non-conformance, the reason for the non-conformance, the responsible party, the result (consequence), the corrective action(s) taken and any necessary follow up measures required.

4.1.3 DECOMMISSIONING PHASE: ENVIRONMENTAL INSPECTIONS AND COMPLIANCE MONITORING

All rehabilitation and decommissioning activities shall be subject to environmental inspections and compliance monitoring to ensure that the potential for residual environmental impacts is minimised to the greatest extent practicable. The site shall be restored to a condition comparable

to its pre-disturbance state or prepared in accordance with the approved future land use (e.g. commercial or mixed-use development).

Inspections shall be conducted by the Operations manager or the appointed representative on a scheduled or ad hoc basis throughout the decommissioning phase. All inspections findings shall be documented, and any non-compliance must be addressed within defined timeframes to ensure full environmental compliance prior to site closure.

4.2 REPORTING

All incidents or non-compliances, including any environmental issue, failure of equipment or accident, are to be reported to the Operations manager throughout the Project's lifecycle. The MEFT reserves the right to require the Proponent to submit bi-annual environmental reports that evaluates the Project's compliance with the commitments that are outlined in this draft ESMP.

For large-scale spills (i.e., > 200 L) and other significant environmental incidents, the fire service should be notified as required and the MEFT office should be informed of the incidents (telephone +264 61 284 2111). If the spillage is of a fuel source (i.e. petrol/diesel), MIME must be notified by completing form PP/11 (telephone: +264 61 284 8111).

If significant environmental spills (hydrocarbons or domestic effluent) occur close or in a water source (both surface and underground sources), the Department of Water Affairs (DWA) is to be notified. All correspondence with DWA must be done by the Operations manager no later than 48 hours after the incident has occurred.

For the clean-up of smaller spills, the relevant material safety data sheet (MSDS) should be consulted to determine the appropriate clean-up procedure. Basic spill response training will be provided to the Project team.

Occupational incidents and accidents incurred on-site should be reported to the authorities (i.e. Occupational Safety & Health Department) at MLIREC, by using form F.5.

In case of archaeological objects or heritage artefacts discovered on-site, the chance find procedure (Appendix B) must be followed and the NHC must be informed by the Proponent or the Operations manager.

All correspondence and communication with local and regulatory authorities should be undertaken by the Proponent or the Operations manager.

4.3 ENVIRONMENTAL CERTIFICATES, LICENCES AND PERMITS

Table 3 outlines the licences and certificates that are required for the Project.

Table 3 - Licence, certificate, permit and authorisation required for the Project

Licence or certificate	Relevant authority	Related activity requiring regulatory authorisation	Act/Regulation/policy
Environmental clearance certificate	DEAF	Required to undertake the listed activities associated with the fuel service station operations.	EMA and the 2012 Regulations
NHC consent	NHC	NHC consent for the management and preservation of heritage objects, if discovered within the Project's footprint.	National Heritage Council Act, No. 27 of 2004
Retail licence	MIME	Required to operate a fuel service station and sell fuel to customers.	Petroleum Products and Energy Act, No. 13 of 1990 and the Regulations of 2000
Consumer installation certificate	MIME	Required for the bulk storage (>200 L) of fuel, handling and dispensing of fuel within a local authority.	Petroleum Products and Energy Act, No. 13 of 1990 and Petroleum Products and Regulations of 2000
Permit for used Mineral Oil	MIME	Required for the temporary storage and management of used mineral oil generated during vehicle servicing and maintenance activities.	Petroleum Products and Energy Act, No. 13 of 1990 and the Petroleum Products and Energy Regulations of 2000

4.4 NON-COMPLIANCE

Where it has been identified that activities are not compliant with this draft ESMP, the Operations manager must ensure that corrective actions are implemented to the extent that the activities return to being compliant as soon as possible. In instances where the requirements of the draft ESMP are not upheld, a non-conformance and corrective action notice will be produced. The notice will be generated during the routine inspections across all service/work areas, and the Operations manager will conduct follow ups to determine whether the corrective actions are implemented as planned and instructed.

A non-compliance event / situation is considered if:

- There is evidence of contravention of this draft ESMP and associated indicators or objectives;
- Project staff fail to comply with corrective actions or other instructions issued to them by the Proponent, Operations manager or qualified authority; or

- There is evidence of negligence in recording, investigating and responding to community complaints through the established reporting channels and grievance resolution mechanisms.

Depending on severity, work will be stopped in the event of a non-compliance, until corrective action(s) has been completed. The non-compliance will be closed out once the Operations manager has inspected the corrective action and confirmed that the issue has been satisfactorily resolved.

4.4.1 DISCIPLINARY ACTIONS

This draft ESMP is a legally binding document. Non-compliance with its provisions may result in disciplinary and/or legal action(s) against the responsible party or parties. These actions may include, but not limited to the following:

- Legal actions in accordance with other applicable environmental, health and labour legislation;
- Suspension or withdrawal of the fuel service station's approved licences, permits or certificates;
- Complete or partial suspension of fuel service station operations until compliance is restored; or
- Disqualification from operating or managing fuel service stations in future.

5 ENVIRONMENTAL AND SOCIAL MANAGEMENT

5.1 ENVIRONMENTAL PERFORMANCE MANAGEMENT

This section provides the overall management plans of potential impacts of the Project during the construction, operations and decommissioning phases. These plans provide mitigation and monitoring commitments, as well as the roles responsible for execution. The Operations manager will use the construction and operational management plan to undertake daily, weekly and monthly inspections to ensure Project activities remains compliant with this draft ESMP during these phases, routine maintenance and ad hoc work, as required. This draft ESMP has been developed to provide guidance to the Proponent, Operations manager, HSE appointed representative, personnel, appointed contractors and subcontractors throughout all phases of the Project. This includes the following:

- **Planning phase:** detailed planning and design of the fuel service station, including the selection of the appropriate underground fuel storage tanks and dispensing systems. Emphasis is placed on incorporating best available technology to prevent leaks, spills and environmental contamination;
- **Construction phase:** the construction of the fuel service station, including land clearing, excavation, grading, installation of underground fuel storage tanks and pipelines, fuel pumps, ancillary facilities and connection to municipal services. All activities shall be undertaken in accordance with industry best practices, with specific focus on spill prevention, waste management, dust suppression and noise control;
- **Operational phase:** the day-to-day management of the fuel service station, including fuel delivery and storage, dispensing activities, retail operations, carwash services, routine inspection and maintenance of fuel tanks, dispensing pumps and equipment, waste management, stormwater control and emergency response to fuel spills and fire incidents; and
- **Decommissioning phase (future phase):** the planned systematic cessation of fuel service station operations, including the safe removal of underground storage tanks, fuel lines and pumps, demolition of above ground infrastructure, proper management and disposal of waste to ensure the site is reinstated/rehabilitated to its pre-disturbed state to the greatest extent practicable or suitably prepared for its next approved land use.

5.1.1 PLANNING PHASE

This phase involves procuring all necessary Project materials, tools and equipment in preparation for the commencement of the construction phase. Key materials such as cement, sand and glass will be procured from the local registered retail stores. Contractors will be appointed to oversee the procurement process to ensure all Project components are acquired on schedule and that power and water supply municipal service connection approvals are obtained prior to the commencement of the construction phase. The Proponent is responsible for ensuring that the development does not significantly alter or detract the visual landscape and the area's sense of place. The specific requirements required during the planning phase are discussed in Table 4.

Table 4 - Environmental aspects, management and mitigation measures for the planning phase

Aspect	Management and mitigation measures	Monitoring requirement	Responsibility
Job creation, skills development and business opportunities	- The Proponent, contractors and subcontractors shall prioritise local employees, particularly drawing from the pool of unemployed youth, previously disadvantaged and vulnerable groups in Karibib for unskilled and semi-skilled labour; - Efforts should be made to enhance and support skills development and capacity building, wherever possible: and - Goods, materials, equipment and consumables shall be sourced from local and regional suppliers to stimulate the local economy and promote inclusive growth.	- Project planning phase	- Proponent - Contractors - Subcontractors
Aesthetic and visual appeal	- Project planning should consider the visual appeal of infrastructure to be constructed onsite. Efforts must be made to ensure that the infrastructure harmonies with the modified town environment; - The use of earth colours (paints) on structures which are in harmony with the natural environment are strongly recommended; - Project activities must be confined to the designated Project footprint to minimise disturbance to surrounding non-target areas; - Plan and design temporary onsite waste storage areas; and - Avoid any neon or non-earthly toned signage that detract from the sense of place.	- Project planning phase	- Proponent
Municipal service utility networks	- Project infrastructure should be designed to avoid disturbance to buried municipal service utility networks (e.g. water pipelines, wastewater systems and power cables). Any such disturbance could result in temporary disruption of services; and	- Project planning phase	- Proponent - Contractors - Subcontractors

Aspect	Management and mitigation measures	Monitoring requirement	Responsibility
	- Town master plans shall be obtained from the KTC Town Planning Department during the planning phase, so that the Project design can account for and avoid any buried municipal service utilities that transect the Erf (if any).		
Fire management	- Develop site-specific fire management and emergency response procedures; - Identify and clearly signpost all emergency evacuation points; - Make effort to equip the fuel service station with appropriate firefighting equipment (i.e. fire extinguishers); and - Ensure emergency contact details are readily available onsite and updated regularly.	- Project lifespan	- Proponent - Operations manager
Energy consumption efficiency	- Energy-efficient devices, such as energy-saving bulbs, must be prioritised and installed; and - Make effort to integrate roof-mounted solar energy into the Project energy grid to reduce reliance on the electricity grid and promote sustainable energy use.	- Project planning phase	- Proponent
Solid waste management	- Tender documents must include provision for pollution control, material substitution and waste recycling to ensure contractors and subcontractors implement effective waste management practices; - The Proponent must establish areas designated for temporary waste storage (including construction waste); and - Develop a waste management plan to ensure waste is disposed of regularly in line with the KTC requirements.	- Project planning phase	- Proponent

Aspect	Management and mitigation measures	Monitoring requirement	Responsibility
Procurement, transport and storage of materials	- All materials required for construction, namely steel, bricks, cement, sand, roofing materials, bitumen, underground fuel storage tanks, generators, piping systems etc. must be sourced from registered suppliers; - Vehicles that transport materials to site must be road worthy; - All drivers that transport materials must have valid drivers' licences and must always adhere to traffic rules and regulations; - Loads on vehicles must be properly secured to avoid them from falling off the vehicles; - The materials used during construction, for example cement and bricks must be stored at a central laydown or storage area for the site to be neat and orderly; - A designated area for concrete batching and disposal of excess effluent must be established; - Fuel, paints, solvents and chemicals storage, handling and usage to be planned, taking the draft ESMP requirements into consideration, e.g. stored in watertight containers to ensure that they cannot react with each other or be spilled onto the ground; and - The construction team shall source sand from permitted sources outside the Project area, as sand mining is strictly prohibited.	- Project planning phase	- Proponent - Contractors - Subcontractors
Project secondary licences/permits/certificates	- Ensure that all the secondary licences, permits and certificates (listed in Table 3) are obtained prior to Project implementation.	- Project planning phase	- Proponent
Site security	- Ensure that all security personnels assigned with security duties of the Project site are sourced from a registered security company.	- Project planning phase	- Proponent

5.1.2 CONSTRUCTION PHASE

The construction phase will involve undertaking Project activities that are expected to be low-impact and less invasive in nature. Although extensive earthworks are not anticipated, limited land clearing, levelling and grading will be required to establish the fuel service station foundation. In addition, onsite construction activities will include installation of the fuel service station canopy, stormwater diversion systems, impermeable surfaces, construction of the food takeaway outlet facility and connection to municipal service utilities (water, power and drainage systems). Access points to the B2 road will also be developed. Construction activities can be associated with accidents and spillages from vehicles, generators and civil works. Excessive noise may also lead to public concerns or negative perceptions. All construction activities will be conducted within the designated Project footprint (i.e. Erf 1204). Targeted mitigation measures will be implemented to minimise the impacts on the receiving environment and social receptors. Responsibility for environmental compliance during the construction phase rests with the Proponent, contractors and subcontractors. Specifically, contractors will assume overall accountability of all onsite construction activities.

The Proponent must ensure that the contractors and their subcontractors are fully informed of the draft ESMP requirements and that these are strictly enforced throughout the construction phase. Additionally, the Proponent or an appointed representative will be responsible for conducting regular site inspections at least once a month to ensure that all the mitigation and management measures are being properly implemented and adhered to. Upon completion of construction activities, the Proponent or appointed representative must conduct a final site inspection and, if satisfied that the Project has been executed in accordance with the draft ESMP and engineering requirements, issue the contractors with a letter of completion which confirms compliance and satisfactory Project outcomes.

The mitigation measures that must be implemented to minimise or prevent environmental damage, pollution or community nuisances are discussed in Table 5.

Table 5 - Environmental and social aspects, impacts, mitigation and monitoring measures for the construction phase

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
Site access control, induction and awareness	- Unauthorized access to the construction site and environmental incidents resulting from personnel being unaware of site requirements	- Clearly demarcate and secure the construction site using fencing, barriers and warning signage; - Restrict access to authorised personnel only; - Maintain a site access register for all employees, contractors, subcontractors and visitors; - All personnel and visitors must undergo a site-specific HSE and environmental induction before entering the worksite; - Conduct regular toolbox talks and environmental awareness sessions throughout the construction phase; and - Ensure all visitors are accompanied by authorised personnel.	- Daily - Weekly - Monthly	- Proponent - HSE appointed representative - Contractors - Subcontractors
Noise	- Community severance and disruption of social interactions.	- Provide advance notice to the neighbours and noise sensitive receptors (NSR) prior to the commencement of construction activities. The construction schedule may be communicated through direct engagement, or other appropriate engagement platform deemed suitable; - Erect a Project noticeboard at the site boundary to inform the residents and motorists about the Project and the appointed contractors and subcontractors involved;	- Daily - Weekly - Monthly	- Proponent - Contractors - Subcontractors

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
		- Conduct pre-start checks on equipment and machinery; - Nighttime work is strictly prohibited (i.e. construction activities must only be conducted between dawn and dusk); - Avoid work on Sunday's and public holidays; - Avoid unnecessary idling of equipment and machineries; - Ensure the best available technology with low sound power is sourced, where possible; and - A complaints register must be kept. Complaints received must be addressed as per complaint handling procedures developed for the Project.		
Visual	- Disruption of the visual landscape and diminished sense of place.	- Maintain good housekeeping throughout the construction phase; - Store construction materials in an orderly manner and within designated storage yards/areas; - Apply water spraying during excavation activities to reduce dust generation; - Use downward-directed temporary lighting to reduce glare at night (avoid installation of flood lights); - Apply for in advance approval by the KTC for lifting operations;	- Daily - Weekly - Monthly	- Proponent - Contractors - Subcontractors

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
		- Request assistance, if required from the Karibib traffic office if needed during lifting operations; and - Equipment and machinery should only be retained onsite for the duration of the construction phase.		
Occupational health and safety	- Potential for injuries or fatalities to be sustained onsite and to the local community.	- The Proponent shall ensure that occupational health and safety requirements are incorporated into the bidding and tendering processes to guarantee that all contractors and subcontractors comply with these standards; - Contractors and subcontractors should comply with all safety requirements outlined in the contracts signed with the Proponent; - Develop and implement a traffic management plan during construction activities; - Inform the local community, KTC and Karibib traffic office when partial road closure is required for construction activities or if heavy/abnormal loads are expected during construction activities; - Only contractor employees with specialised skills should be assigned tasks associated with injury risks; - Construction activities should only be conducted between dawn and dusk;	- Daily - Weekly - Monthly	- Proponent - HSE appointed representative - Contractors - Subcontractors

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
		- The consumption of alcoholic beverages and drugs is strictly prohibited onsite. Anyone found to be under the influence of alcohol/drugs must be disciplined; - Contractors and subcontractors must ensure that their workforce is equipped with appropriate PPE (e.g. work overalls, hard hats, gloves and steel-capped safety boots); - Conduct regular toolbox talks, especially with unskilled or semi-skilled employees; - The Proponent or appointed representative must conduct regular site inspections to monitor compliance with safety standards (e.g. ensuring that tools are securely stored and that PPE is properly worn by the workforce); - Ensure contractor workforce is competent and received the necessary training to execute their specific tasks, for example: lock out and tag out, lifting operations/use of cranes, working at heights; - The required HSE signage to be in place during construction activities; - Conduct pre-start job safety analysis and risk assessments before each activity takes place;		

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
		- No standing under loads during lifting operations, listen to the instructions of the rigger, operator and/or supervisor overseeing the task/activity; and - Maintain records of all injury statistics, track corrective actions and record lessons learnt to improve safety practices onsite.		
Air quality	- Dust generation.	- Ensure all land clearing activities are limited to the defined Project footprint to avoid unnecessary environmental disturbances; - Designate a cement handling and concrete batching zone; - Take necessary measures to cover and secure cement bags to minimise windblown dust and material loss; and - Project vehicles must be confined to existing roadways.	- Daily - Monthly	- Contractors - Subcontractors
Soil	- Potential for soil, surface water and groundwater contamination.	- Ensure that the underground fuel storage tanks are installed as per specifications of the manufacturer and that a retail licence and consumer installation certificate is obtained from MIME; - The Proponent shall ensure the installation of appropriately designed underground fuel storage tanks that are corrosive resistant, have double walled	- Daily - Weekly - Monthly	- Proponent - Contractor - Subcontractor

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
		systems and leak detection mechanisms to prevent and monitor potential leaks; - Fuel bowzers (if kept onsite) must be equipped with drip trays during each refuelling event to prevent spills and proper containment; - All fuel and chemical containers shall be stored on an impervious base, bunded and capable of containing at least 110% of the total capacity of the storage container; - All fuel and chemical storage containers must be placed on stable/level ground to prevent them from tipping over or spillage; - All Project vehicles, machinery and equipment to be serviced as required to reduce the risk of spillage; - Major servicing of equipment should be conducted off-site; - Fully stacked spill kits are to be kept onsite throughout the construction phase; - Hazardous and hydrocarbon substances are to be stored upright at all times and handled, transported and stored as per MSDS requirements; and - MSDSs are to be kept for each chemical or hydrocarbon used onsite. These must be accessible to all personnel.		

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
		The following measures are to be implemented in response to a spill: - Spills are to be stopped at source as soon as possible; - Spilt material is to be contained to the smallest area possible using a combination of absorbent materials, earthen bunds or containment methods; - Spilt material is to be recovered as soon as possible using appropriate equipment. In most cases, it will be necessary to excavate the underlying soil until clean soil is encountered; - Recovered contaminated soil must be disposed of at an appropriate disposal facility; - The Proponent is to be informed of any major spill event (> 200 L spill). A written incident report must be submitted to the Proponent outlining the cause, extent and corrective actions implemented; and - Large spills must be reported immediately to MEFT. If hydrocarbon and petroleum spills of > 200 L occur, MIME must be informed.		
Water consumption	- Potential water wastage.	- Water must be used sparingly during the construction phase; - Connection to a municipality water source must be provided by the KTC;	- Daily - Weekly - Monthly	- Contractors - Subcontractors

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
		- No stagnant /pooling water; - Water leakages or pipe bursts should be reported and fixed as soon as possible; and - Water bowsers and reservoirs used for temporary storage of water must be covered to reduce water loss through evaporation.		
Domestic and construction waste management	- Litter and visual nuisance. - Pollution.	- Ensure consistent and effective housekeeping is maintained onsite throughout the construction phase; - Litter generated during construction activities such as cement bags and scrap metal must be collected and stored directly in waste receptors/skips; - Food waste must be securely stored in sealable waste bins to deter scavengers; - All construction waste (either combustible or non-combustible) temporary stored onsite must be stored securely in waste drums that have lids and disposed of offsite at an appropriate waste disposal site; - No construction waste may be burnt or buried onsite; - No paints, solvents, thinners, diesel, petroleum products or any other harmful substance may be poured onto the ground or into the Karibib sewage system; - Ensure designated smoking areas and ash trays;	- Daily - Weekly - Monthly	- Proponent - Contractors - Subcontractors

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
		- Used oil to be removed through registered companies and - Empty containers, oil filters (if used) and hazardous/hydrocarbon waste should be removed from site and disposed of a suitable registered hazardous waste facility.		
Wastewater (effluent) management	- Odours and health risks.	- Only temporary installed chemical/portable toilets are to be used by the construction workforce; - No employee may relieve himself or herself in the surrounding environment or work area; - Ablution facilities must be cleaned regularly to maintain hygiene and prevent health risks; and - Ensure effluent is disposed of at the Karibib wastewater works.	- Daily - Weekly - Monthly	- Proponent - Contractors - Subcontractors
Concrete batching	- Cement contaminated runoff. - Sedimentation and erosion.	- Concrete mixing and batching shall only occur within designated impermeable areas away from drainage pathways; - Wash water from concrete equipment shall not be discharged onto bare soil or into the municipal stormwater system; - Cement, aggregates and other construction materials shall be stored under cover or protected from rainfall and wind; and	- Daily. - After rainfall events - Weekly	- Proponent - HSE appointed representative - Contractors - Subcontractors

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
		- All spills of concrete, cement slurry or other hazardous materials shall be cleaned up immediately.		
Flora	- Potential introduction and spread of alien or invasive species.	The Project site is pre-disturbed and has a low vegetation density. No protected species will be removed or disturbed. However, the following precautionary measures will be implemented: - Construction activities will be confined to the designated development areas to prevent unnecessary disturbance to the surrounding environment; - Conduct a thorough weed and seed inspection on all equipment, tools, machinery and delivered materials to prevent the potential introduction and spread of alien or invasive plant species (see template form in Appendix BAppendix A); - Clearly demarcate one (1) access road to ensure minimal disturbance to vegetation; - No veld fire or controlled burns are permitted at any time; and - Herbicides should not be used onsite.	- Daily - Weekly - Monthly	- Proponent - Contractors - Subcontractors
Stormwater management	- Stormwater pollution.	- Stormwater shall be diverted away from excavations, fuel storage areas and concrete batching areas where practicable; and	- After rainfall events - Weekly	- Proponent - Contractors - Subcontractors

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
		- Stormwater control measures shall be inspected after rainfall events and repaired where necessary.		
Socio-economic	- Temporary disturbance to neighbouring businesses and residents. - Local employment and procurement opportunities. - Community grievances.	- Prioritise local employment where reasonably practicable; - Procure goods and services from local suppliers where feasible; - Maintain regular communication with affected stakeholders regarding construction activities; - Implement and maintain a grievance mechanism and complaints register; - Ensure construction traffic complies with approved traffic management measures; and - Minimise disruption to neighbouring properties and public access.	- Weekly - Monthly	- Proponent - HSE Appointed Representative - Contractors - Subcontractors
Resource consumption	- Excessive consumption of natural resources. - Unnecessary depletion of resources.	- Materials shall be ordered accurately to minimise wastage; - Water shall be used efficiently and leaks repaired immediately; - Machinery and equipment shall be switched off when not in use to minimise fuel consumption and emissions;	- Daily - Weekly - Monthly	- Proponent - Contractors - Subcontractors

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
		- Construction materials shall be stored appropriately to minimise damage and wastage; and - Electricity and water consumption shall be monitored where applicable		
Urban wildlife management	- Potential to encounter and interact with town-adapted fauna during the construction phase.	- Animals encountered onsite have the right of way; - Feeding of encountered animals onsite is strictly prohibited (e.g. deliberate feeding baboons, domestic strays and pigeons); - The unauthorised use of surveillance equipment (e.g. drones) is strictly prohibited; and - The construction team must maintain a high level of housekeeping to prevent odours, vermin, pests, and to minimise the attraction of snakes and scorpions to the work area.	- Daily - Weekly - Monthly	- Contractors - Subcontractors
Historical, archaeological and cultural heritage	- Potential damage to archaeological finds during construction activities.	Should contractors discover any surface or subsurface archaeological scatter or site be discovered within the Project area throughout the construction phase, these features must be reported immediately and preserved by following these measures: - No surface scatters or artefacts shall be collected, or damaged in any way; and - The chance find procedure (Appendix AAppendix B) must be adopted and followed.	- The duration of the construction phase	- Proponent - Contractors - Subcontractors

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
		No cultural sites of significance are present on the erf.		
Security (overnight guarding of the Project site)	- Theft of construction materials and other related security concerns.	- The construction team is not allowed to setup overnight camps onsite during the construction phase, all employees must reside in Karibib or nearby towns (e.g. Usakos or Omaruru); - If a security guard is required, he/she must be sourced from a formal registered security company; and - No visitors are allowed without prior approval from the Proponent.	- Daily	- Proponent - Contractors - Subcontractors - Security personnel
Rehabilitation	- Unrehabilitated disturbed areas and long-term environmental degradation	- Disturbance shall be limited to the approved Project footprint; - All temporary infrastructure, construction materials, waste and equipment shall be removed following completion of construction activities; - Final rehabilitation shall be undertaken in accordance with the requirements of this draft ESMP; and - A final environmental inspection shall be conducted before contractor demobilisation.	- Daily - Weekly	- Proponent - Contractors - Subcontractors
Post construction environmental restoration	- Visual nuisance and unrehabilitated disturbed areas.	- Following the completion of construction activities, a final site inspection must be conducted across all work areas to verify that all partially disturbed areas	- Once-off. Final site approval exercise post-construction activities	- Proponent

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
		have been restored in accordance with the requirements outlined in this draft ESMP; and - Contractors and subcontractors must be issued compliance certificates upon successful completion of work, provided draft ESMP requirements are satisfactory met.		

5.1.3 OPERATIONAL PHASE

This section outlines the management, mitigation and monitoring measures to be implemented during the daily operation and management of the fuel service station and its associated activities.

All operational activities should be guided by the following principles:

- To manage fuel service station operations and activities in ways that minimise disturbance to the surrounding natural environment, including soil and water resources;
- To promote and enforce environmentally responsible practices among the operational staff and customers;
- To prioritise the protection of natural and human environments by integrating sustainable practices into all aspects of the fuel service station operations;
- To comply with industry environmental standards and best practices regarding fuel handling, dispensing, storage, carwash and retail operations; and
- To actively collaborate with regulatory authorities and stakeholders by maintaining transparent communication and ensuring full compliance with conditions of all Project-approved permits, certificates and licences.

The Operations manager, operational staff and customers shall be responsible for ensuring effective implementation of the measures outlined in this section. The specific environmental management measures and monitoring requirements required for implementation during the operational phase are discussed in Table 6.

Table 6 – Environmental and social aspects, impacts, mitigation and monitoring measures for the operational phase

Aspect	Potential impact	Management and mitigation measures	Monitoring requirement	Responsibility
Operational phase				
Job creation and acquisition of work experience	- Income generation and improved standard of living.	- Ensure that all operational staff members are recruited through the establishment recruitment procedures, giving preference to local labour, disadvantaged and vulnerable groups; and - Ensure all employees are issued formal employment contracts.	- HR policy	- Proponent - Operations manager
Environmental awareness	- Environmental grievances and misconduct due to lack of awareness.	- Keep environmental policies and guidelines on file; - Ensure the approved ESMP is revised as required to align with the provisions outlined in the environmental policies, regulations and their amendments thereof; - Ensure staff are regularly inducted (trained) on environmental matters to ensure they understand the requirements of the approved ESMP; and - Ensure roles and responsibilities of various staff members are clearly defined in their employment contracts.	- Ad hoc	- Operations manager - Operational staff
Domestic waste management	- Littering, visual nuisance, odours and health risks. - Pollution.	- Maintain good housekeeping across all operational areas; - Provide waste bins across various areas of the fuel service station to ensure proper waste management by the operational staff and customers; - Once emptied, food waste bins must be cleaned, dried and returned to their designated areas; - Ensure collaboration with the KTC waste management division to ensure waste is regularly disposed of at the licenced waste disposal site; and	- Daily - Weekly - Monthly	- Operations manager - Operational staff

Aspect	Potential impact	Management and mitigation measures	Monitoring requirement	Responsibility
Operational phase				
		- Fat trap for the kitchen must be emptied when full and disposed of at the designated area and removed to a registered hazardous waste landfill site.		
Fuel storage and handling	- Potential leakage from underground storage tanks. - Soil and groundwater contamination. - Fire and explosion hazards.	- Develop an inspection schedule of the double-walled underground storage tanks to ensure leaks are timely detected; - Conduct daily monitoring of fuel tank levels, pipping and dispensing pumps; - All fuel delivery activities must be supervised by trained personnel; - Maintain tanks in accordance with MIME petroleum storage requirements; - Tank filling points must be located within bunded containment areas; - Ensure an emergency and fire response procedure is developed, and regular testing/drills are conducted; - No smoking on site; - Display all appropriate HSE signage; and - Regularly inspect automatic shut-off valves on dispensing pumps.	- Daily - Weekly - Monthly - Annually	- Operations manager - Operational staff
Spill prevention and emergency response	- Fuel and chemical spills - environmental pollution - Fire hazards	- Spill kits shall be available at all fuel dispensing areas, storage areas and workshop/service areas; - Employees shall receive spill response training; - All spills shall be contained and cleaned immediately;	- Daily inspections - Monthly inspections	- Operations Manager - HSE Representative - Employees

Aspect	Potential impact	Management and mitigation measures	Monitoring requirement	Responsibility
Operational phase				
	- Health and safety risks.	- Spill response procedures shall be displayed at strategic locations; - Major spills shall be reported to the relevant authorities in accordance with legislative requirements; and - Spill response equipment shall be inspected and replenished regularly.		
Stormwater management	- Potential contamination of surface water by hydrocarbons. - Flooding of the forecourt and operational areas during heavy rainfall events.	- Maintain impermeable concrete forecourt surfaces; - Prevent fuel or oil from entering stormwater drains; - Regular maintenance on trenches; and - Regular cleaning of forecourt surfaces and trenches. - Keep all stormwater drainage systems free of litter, sediment and debris; - Ensure spill kits are readily available near stormwater inlets to contain spills before contaminants enter the drainage system; and - During heavy rainfall or flood events, suspend fuel deliveries and any non-essential activities that may increase the risk of pollution where it is safe and practical to do so.	- Monthly - Inspections after major rainfall events	- Operational staff
Gas cylinders storage and refilling	- Fire and explosion. - Gas leaks. - Injury to employees and customers.	- Full and empty cylinders shall be stored separately; - Cylinders shall be protected from direct sunlight, impact and ignition sources; - Damaged or leaking cylinders shall be isolated immediately and returned to the supplier;	- Daily - Weekly - Monthly	- Operations Manager - HSE Representative - Employees

Aspect	Potential impact	Management and mitigation measures	Monitoring requirement	Responsibility
Operational phase				
	- Damage to infrastructure.	- No smoking or open flames shall be permitted within the designated gas storage area; - Appropriate fire extinguishers shall be available and maintained; and - Only authorised personnel shall handle gas cylinders.		
Greywater management – carwash operations	- Contaminated wastewater with oils and detergents.	- Use biodegradable detergents; - Ensure greywater drainage systems are fully functional to prevent accumulation of stagnant greywater; and - Prevent discharge of greywater into natural drainage systems.	- Daily - Weekly - Monthly	- Operations manager
Wastewater management – ablution facilities	- Sewer overflow and contamination.	- Maintain plumbing systems to prevent leaks; - Daily cleaning and reporting of issues with checklist; and - Good housekeeping.	- Monthly	- Operational staff
General waste management (food waste and packaging)	- Litter and improper disposal.	- Provide labelled waste bins and segregated waste; and - Waste must be disposed at licenced waste disposal facilities.	- Daily - Weekly	- Operations manager - Operational manager
Hazardous and hydrocarbon waste (oil filters and contaminated materials)	- Soil contamination.	- Store hazardous and hydrocarbon waste in sealed containers and dispose through licenced waste contractors at a licenced waste disposal site; and - Used oil to be removed through registered companies with the appropriate permits in place.	- Weekly - Monthly	- Operations manager

Aspect	Potential impact	Management and mitigation measures	Monitoring requirement	Responsibility
Operational phase				
Occupational health and safety	- Fire hazards and chemical exposure. - Workplace injuries.	- Provide PPE to operational staff; - Maintain firefighting equipment and conduct emergency response training; - Ensure appropriate safety signage is in place to inform personnel and customers of hazards, such as prohibiting the use of mobile phones in the vicinity of fuel storage; - Ensure that occupational health incidents and safety hazards are recorded and reported to the regulatory authorities; and - Maintain first aid kits onsite.	- Monthly	- Operations manager - Operational staff
Security, parking and public safety	- Theft and vandalism - Loitering - Harassment of customers or employees - Public safety risks - Vehicle collisions within the forecourt	- CCTV cameras shall be installed and maintained in strategic locations; - Adequate lighting shall be provided throughout the facility; - Security personnel shall monitor the premises where required; - Loitering shall not be permitted on the premises, and individuals causing disturbances shall be requested to leave; - Where necessary, assistance shall be sought from the Namibian Police or local authorities; - Employees shall be trained to manage security incidents safely without unnecessary confrontation; - Emergency contact numbers shall be displayed prominently;	- Daily - Weekly - Monthly	- Operations Manager - HSE Representative - Security Personnel - Employees

Aspect	Potential impact	Management and mitigation measures	Monitoring requirement	Responsibility
Operational phase				
		- Speed limits and directional signage shall be enforced within the facility; and - Pedestrian walkways shall be clearly marked where applicable.		
Traffic flow	- Safety risks for customers and vehicles.	- Erect appropriate road signage, speed control measures and other traffic control measures (as approved in consultation with Roads Authority (RA) and KTC); and - Scheduling of fuel deliveries during off-peak traffic periods.	- Once off	- Operation manager
Maintenance of fuel storage and dispensing infrastructure	- Fuel leaks from underground storage tanks (USTs), pipelines and dispensing pumps - Soil and groundwater contamination - Fire and explosion hazards	- Develop and implement a preventative maintenance programme for all fuel storage tanks, pipelines, dispensers, pumps and associated infrastructure; - Conduct routine inspections for leaks, corrosion, cracks and mechanical defects; - Maintain and calibrate leak detection systems; - Inspect emergency shut-off valves regularly to ensure they are fully operational; - Repair or replace damaged equipment immediately upon identification; and - Maintain records of inspections, maintenance activities, repairs and testing.	- Daily visual inspections. - Monthly inspections.	- Operations Manager. - HSE Representative. - Maintenance personnel
Staff training and competency	- Unsafe work practices	- All employees shall receive induction training before commencing work; - Refresher training shall be provided periodically;	- Annually	- Operations Manager - HSE Representative

Aspect	Potential impact	Management and mitigation measures	Monitoring requirement	Responsibility
Operational phase				
	- Increased risk of incidents and accidents - Poor emergency response - Environmental pollution resulting from improper handling of fuels and chemicals	- Employees shall receive training on fuel handling, hazardous chemicals, spill response, fire prevention, first aid, emergency response, customer safety and waste management; and - Training records shall be maintained and reviewed periodically.		
Pest, vermin and scavenger management	- Attraction of rodents, birds, insects and other scavengers. - Health and hygiene risks. - Damage to infrastructure. - Nuisance to customers and neighbouring properties.	- Maintain a high standard of housekeeping throughout the facility; - Waste bins shall be covered, leak-proof and emptied regularly to prevent the attraction of pests and scavengers; - Food waste shall not be allowed to accumulate on the premises; - Waste storage areas shall be cleaned regularly; - Pest infestations shall be monitored and managed using environmentally responsible pest control methods; and - Employees shall report any evidence of pest infestations immediately.	- Daily housekeeping inspections - Weekly - Monthly	- Operations Manager. - HSE Representative. - Operational staff.

Aspect	Potential impact	Management and mitigation measures	Monitoring requirement	Responsibility
Operational phase				
Vegetation management	- Overgrown vegetation creating fire hazards. - Attraction of snakes, rodents and other pests. - Poor visual appearance	- Vegetation shall be maintained regularly to ensure a neat and safe environment; - Grass and shrubs shall be trimmed to maintain visibility around fuel pumps, entrances, exits and parking areas; - Invasive alien plant species shall be removed where identified; and - Herbicides shall only be used where necessary and in accordance with the manufacturer's instructions.	- Monthly	- Operations Manager - Maintenance personnel.
Operational wastewater management	- Contamination of stormwater - Soil and groundwater pollution - Blockage of drainage systems.	- Wastewater generated from routine cleaning of the forecourt, vehicle windscreens and other operational activities shall be directed to the approved drainage system and shall not discharge directly into the stormwater network; - Oil-water separators shall be inspected, maintained and cleaned regularly; - Detergents and cleaning agents shall be biodegradable where reasonably practicable; - Wastewater shall not be allowed to pond or flow beyond the site boundary; and - Drainage systems shall be inspected regularly for blockages or signs of contamination.	- Weekly - Monthly	- Operations Manager. - HSE Representative. - Operational staff.
Lighting (day and night operations)	- Disturbance to neighbouring properties	- Provide sufficient lighting to ensure the safety of employees, customers and vehicles during hours of darkness;	- Weekly - Monthly	- Operations Manager.

Aspect	Potential impact	Management and mitigation measures	Monitoring requirement	Responsibility
Operational phase				
	- Reduced visibility if lighting is inadequate - Increased security risks. - Attraction of insects	- Lighting shall be directed downward and shielded where practicable to minimise light spill onto adjacent properties and public roads; - Burnt-out or damaged lights shall be replaced promptly; - Lighting around fuel dispensing areas, entrances, exits and parking areas shall be maintained in good working order; and - Lighting should not interfere with motorists' visibility or create glare.	- Night-time inspections	- HSE Representative. - Maintenance personnel.

5.1.4 DECOMMISSIONING PHASE

The decommissioning phase follows the operational phase and involves the safe closure and removal of fuel service station infrastructure once the facility is no longer required. This section provides a site-specific plan developed to ensure that appropriate environmental management practices are implemented during the decommissioning and closure phase of the fuel service station.

The decommissioning phase:

- Provide effective and implementable site-specific procedures and mitigation measures to monitor and manage environmental impacts throughout the decommissioning phase of the Project. These measures aim to minimise the likelihood and extent of post-decommissioning environmental impacts, particularly those associated with contamination of soils and water resources;
- Ensure safe decommissioning and removal of fuel storage tanks, pipelines, fuel pumps, separators and associated infrastructure in accordance with applicable petroleum handling regulations and municipal requirements;
- Establish a long-term management plan for the Project site to ensure its safe transition to a suitable future land use;
- Aims to eliminate the long-term liability issues and reduce the likely occurrence of irreversible impacts post site closure; and
- Provide a platform for the Proponent to engage/collaborate with local communities, stakeholders and regulatory authorities in the planning and implementation of decommissioning activities, including the disposal of waste, building remnants and post-closure care requirements.

Prior to the implementation of any decommissioning or closure measure, a thorough assessment of potential alternative land uses for the site must be conducted, particularly in consultation and collaboration with selected stakeholders. This will ensure that opportunities for sustainable land use and appropriate ecological restoration measures are fully considered and effectively integrated into the overall site closure strategy. It is anticipated that a reputable contractor will be engaged for the decommissioning program.

Where required, environmental investigations such as soil sampling and groundwater assessments will be conducted following the removal of underground fuel storage tanks and associated infrastructure to determine whether hydrocarbon contamination has occurred and whether remediation measures are required.

The decommission phase or site closure is yet to be determined. However, should this be required or determined for any reason, the following general conditions outlined in Table 7 shall be followed and implemented, as best practice measures.

Table 7 - Rehabilitation plan for the Project

Aspect	Management measures required	Monitoring requirements	Responsibility
Tools and equipment	- All fuel containers must be removed, and any hydrocarbon stains within Project areas must be promptly and thoroughly cleaned up and disposed of at a registered hazardous waste landfill site; and - Ensure all hand and power tools are cleared from site prior to site closure.	- Conduct visual inspections of all operational areas to ensure removal of tools, containers and equipment. - Inspect storage areas for hydrocarbon stains or spills. - Verify that contaminated cleaning materials are properly collected and disposed of through approved waste management procedures. - Record findings in the site closure inspection.	- Contractor
Wastewater management systems	- All drainage systems, wastewater pipes and components must be disconnected from municipal networks, dismantled and safely disposed offsite at an approved waste disposal facility or wastewater treatment works; and - Ensure all wastewater is properly drained (i.e. no pooling shall remain on-site upon closure).	- Conduct inspections during the dismantling process to ensure all drainage pipes, separators and wastewater infrastructure are properly removed. - Inspect the site to verify that no wastewater pooling following system removal. - Confirm that wastewater infrastructure components are transported to approved disposal facilities.	- Contractor - Operations manager

Aspect	Management measures required	Monitoring requirements	Responsibility
Hazardous and hydrocarbon waste management	- Hazardous and hydrocarbon waste including contaminated soil, absorbent materials, oil filters and fuel residues must be stored in sealed containers. - Hazardous waste materials must be disposed of at a licenced hazardous waste disposal site.	- Inspection of hazardous and hydrocarbon waste storage containers. - Verification of hazardous and hydrocarbon waste disposal certificates.	- Contractor - Operations manager
Building remnants, scrap metals etc.	- All infrastructure must be demolished to ensure there will be no free-standing structures; and - Building remnants should be disposed offsite at a registered waste disposal site.	- Disposal certificates.	- Operations manager - Contractor
Site rehabilitation	- Disturbed areas must be rehabilitated by levelling the ground and stabilising exposed soils; and - Where necessary, vegetation should be re-established to restore the ecological integrity and aesthetic value of the site.	- Monitoring of soil stability and vegetation establishment where applicable.	- Project manager - Contractor
Site closure	- Conduct a final site inspection with the representatives of regulatory authorities (e.g. KTC) to verify satisfaction with decommissioning outcomes; and - Ensure that all environmental and safety requirements have been fulfilled prior to closure approval.	- Final environmental inspection and closure audit. - Verification that all decommissioning measures have been completed.	- Proponent - Operations manager - Regulatory representative
Future land use	- Collaborate with relevant stakeholders and authorities to determine suitable future land use for the site; and - Ensure that the site is safe and environmentally stable for any future development or land use.	- Review of rehabilitation outcomes and site condition prior to future land approval.	- Proponent - Regulatory representative

6 PROPERTY TRANSFER, LEASE OR SALE

In the event that fuel service station operations cease due to a transfer of ownership, lease of the property, the incoming owner is required to comply fully with all conditions outlined in this draft ESMP. At this stage, should infrastructure be removed, it is recommended that the Proponent implement a comprehensive rehabilitation plan to restore the site to its natural and ecological state, as far as reasonably practicable. This will prevent further environmental degradation and prepare the land for its next intended use.

7 IMPLEMENTATION OF THE ESMP

This ESMP draft:

- A. Has been prepared pursuant to the contract with the Proponent;
- B. Has been prepared on the basis of information provided to ECC up to July 2026;
- C. Is for the sole use by the Proponent, fuel service station employees, contractors and subcontractors during the planning, construction, operational and decommissioning phases;
- D. Must not be used by any person other than (1) the Proponent (2) contractors and subcontractors; and
- E. Must not be copied without the prior written permission of ECC.

APPENDIX A - CHANCE FIND PROCEDURE

This section covers the procedures, reporting and management requirements to be followed should sites or items of archaeological or heritage significance be discovered, encountered or unearthed within the operational areas of the proposed fuel service station.

Scope: The “chance finds” procedure covers the actions to be taken from the moment a heritage resource or archaeological object is discovered during construction, operation, maintenance or decommissioning activities, until the site has been investigated and assessed by a qualified archaeologist or other appropriately qualified person.

Compliance: The “chance finds” procedure is intended to ensure compliance with relevant provisions of the National Heritage Act, No. 27 of 2004, especially Section 55 (4) which states that: *“A person who discovers any archaeological object must as soon practicable possible report the discovery to the National Heritage Council (NHC)”*.

The procedure of reporting set out below must be observed so that heritage remains reported to NHC are correctly identified in the field.

Responsibilities:

Contractors/employees – must exercise due caution during any excavation, maintenance or decommissioning activities. Should any archaeological artefacts, fossils, human remains or heritage objects be discovered, work in the immediate area must cease immediately and the finding must be reported to the Project supervisor.

Operations manager – responsible for securing the discovery site, preventing further disturbance, and notifying the Proponent as soon as possible. The Operations manager must ensure that no further work occurs in the affected area until clearance is granted.

Proponent – responsible for establishing a temporary exclusion zone around the discovery site, determining safe working boundaries and formally notifying the relevant authorities and request for inspection.

Archaeologist – Upon request, the appointed archaeologist will inspect the site, identify the significance of the discovered materials, provide guidance on appropriate management actions and, where necessary, recover or document the remains.

Table 8 provides the environmental aspects and impacts, mitigation and monitoring measures for archaeological and heritage aspects.

Table 8 - Archaeological and heritage aspects

Responsibility:	- The Proponent, Project manager, Project employees, contractors and subcontractors
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Potential issues or impacts:	- Impact on heritage features.
Aspects	Management /mitigation measures
Potential to unearth heritage objects or resources.	- All personnel and contractors working at the Project site should be aware of the protected archaeological site and the legal obligation to report any new findings to NHC immediately. Should a heritage site or archaeological site be uncovered or discovered particularly during the construction phase, a chance find procedure should be applied in the order they appear below: - If operating machinery or equipment, immediately stop work; - Demarcate the site with danger tape; - Determine global positioning system (GPS) position if possible; - Report findings to the Project supervisor; - Report findings, site location and action taken to the Proponent; - Cease any works in the immediate vicinity; - Visit the site and consult any potentially affected community to determine whether work can proceed without damage to the findings; - Determine and demarcate the exclusion boundary; - Site location and details to be added to the Project's geographic information system (GIS) for field confirmation by an archaeologist; - Inspect the site and confirm addition to the Project GIS; - Advise the NHC and request written permission to remove findings from work area; and - Recover, package and label findings for transfer to the National Museum. Should human remains be found, the following actions must be followed: - Apply the chance find procedure as described above; - Schedule a field inspection with an archaeologist to confirm that the remains are human; - Advise and liaise with the NHC and Police; and - Remains will be recovered and removed to either the National Museum or the National Forensic Laboratory.

APPENDIX B – WEED AND SEED INSPECTION FORM

WEED AND SEED CLEARANCE CERTIFICATE

SECTION 1 – SITE MANAGER TO COMPLETE (AT LEAST 2 DAYS PRIOR TO EQUIPMENT ARRIVING)

Site Manager or responsible person bringing equipment to site:

Name:		Department:	
Site:		Equipment Arrival Date:	

Details of the owner of the equipment:

Equipment owner:		Company Name:	
Equipment type:		Equipment ID:	
Date Equipment was washed:		Inspected By:	
Where was the equipment last used:			

SECTION 2 – HSE REPRESENTATIVE TO COMPLETE PRIOR TO ANY GROUND WORKS COMMENCING

Inspection area	Requirements	Compliance		
		Yes	No	NA
Body works	Free of all soil and vegetation			
Bumpers	Hollow sections and attachment points free of dirt			
Tyres	Free of all soil and vegetation			
Dual Wheels	Free of all soil and vegetation			
Canopy	Free of all soil and vegetation			
Radiator	Free of all soil and vegetation – specifically look for seed heads			
Interior	Free of soil and vegetation – specifically look for seed heads in upholstery and under mats			
Storage compartments	Free of all soil and vegetation			
Jack and tool kit	Check tool roll and spare wheel are clean			
Racks and bull bars	Free of all soil and vegetation			
Ropes/ Straps/ Cages	Free of all soil and vegetation? Carefully check Velcro and tensioning devices			
Tracks	Carefully check tracks are clean of soil and vegetation			
Water bowser	Free of all soil and vegetation			

WEED AND SEED CLEARANCE CERTIFICATE

Inspection area	Requirements	Compliance		
		Yes	No	NA
Fuel bowser	Free of all soil and vegetation			
Core cutting equipment	Free of all soil and vegetation			

Actions required:	Accountability	Complete By:	Completed?

On inspection of the aforementioned equipment, it has been found to be in a clean and weed seed free state and has been approved for use on the _____ Project.

Please ensure a copy of this certificate remains with the equipment for the operator while completing the site works.

SECTION 3 – BOTH PARTIES TO COMPLETE

Approval / Sign Off		Signature	Date
HSE Representative: 	I certify that the equipment meets the company standards		
Site Manager: 	I understand the condition applicable to this certificate and will ensure the equipment will arrive on site in the state in which it was inspected		
Operator/Company Rep: 	I certify that the equipment has been cleaned prior to being sent to site. The equipment will arrive on site as it was inspected or will arrive on site in a state that will meet the expectations of this permit.		



ESMP SUPPORT FORMS AND TOOLS

WEED AND SEED CLEARANCE CERTIFICATE

Records office use only:

(Please Tick)

(Please Tick)

Actions forwarded to Site Manager:		Copies of certificates forwarded to Site manager:	
Certificate filed:		Signature	