



**MKUBWA MIXED STEEL  
AND LOGISTICS LTD**

**Environmental Management Policy and Plan  
Mkubwa Mixed Steel and Logistics LTD  
Kampala, Uganda  
February 2023**





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# MKUBWA MIXED STEEL AND LOGISTICS LTD

## 1.1. Company Overview

Mkubwa Mixed Steel and Logistics LTD, based in Kampala, Uganda, is a premier scrap management and trading company specializing in the collection, sorting, processing, and trading of scrap metals. We serve both local and international markets, partnering with prominent global companies to supply high-quality recycled materials. Our mission is to drive Uganda's circular economy while prioritizing environmental sustainability, safety, and community well-being.

## 1.2. Purpose of the Environmental Management Policy and Plan

This Environmental Management Policy and Plan (EMPP) establishes a framework for integrating environmental responsibility into all aspects of our operations. It ensures compliance with Uganda's environmental laws, aligns with international standards such as ISO 14001, and meets the expectations of our global partners. The plan outlines clear strategies for waste management, pollution prevention, carbon reduction, and stakeholder engagement, making it a practical guide for sustainable operations.

## 1.3. Scope and Applicability

The EMPP applies to all activities of Mkubwa Mixed Steel and Logistics LTD, including scrap collection, sorting, storage, transportation, and trading. It covers our facilities in Kampala, our supply chain, contractors, and stakeholders. The plan is designed to comply with the National Environment Management Authority (NEMA) regulations and support Uganda's sustainable development goals.

## 2. Policy Statement

### 2.1. Commitment to Environmental Sustainability

Mkubwa Mixed Steel and Logistics LTD is committed to minimizing our environmental footprint while delivering exceptional scrap management services. We pledge to:

Promote recycling and resource recovery to support a circular economy.

- Prevent pollution and protect Uganda's natural ecosystems.
- Engage communities and stakeholders in sustainable practices.
- Continuously improve our environmental performance through innovation and compliance.





## **2.2. Alignment with International and National Standards**

Our operations adhere to:

- ISO 14001: 2015. A globally recognized standard for environmental management systems.
- United Nations Sustainable Development Goals (SDGs): Particularly SDG 12 (Responsible Consumption and Production) and SDG 13 (Climate Action).
- Uganda's National Environment Act, Cap 153: Governs waste management and environmental protection.
- National Climate Change Act, Cap 182: Guides our climate mitigation and adaptation efforts.
- National Climate Change (Climate Change Mechanisms) Regulations, 2025: Supports our participation in Uganda's carbon market.

## **3. Legal and Regulatory Framework**

### **3.1. Ugandan Environmental Legislation**

Our operations comply with the following laws:

- National Environment Act, Cap 153: Mandates environmental impact assessments (EIAs), waste management, and pollution control.
- National Climate Change Act, Cap 182: Requires businesses to adopt climate-friendly practices and report emissions.
- National Climate Change (Climate Change Mechanisms) Regulations, 2025: Outlines procedures for carbon credit trading and project validation.
- Waste Management Regulations, 2020: Governs the handling, storage, and disposal of hazardous and non-hazardous waste.
- Water Act, Cap 152: Protects water resources from contamination during scrap handling.
- Occupational Safety and Health Act, 2006: Ensures safe working conditions related to environmental management.

### **3.2. International Standards and Conventions**

We align with:

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- ISO 14001:2015: Provides a systematic approach to environmental management.
- Basel Convention: Regulates trans-boundary movements of hazardous waste, critical for our international trading activities.
- Paris Agreement: Guides our carbon reduction strategies and climate action initiatives.

### **3.3.Compliance Monitoring and Reporting**

We maintain a compliance register to track legal obligations, conduct quarterly reviews, and submit annual environmental performance reports to NEMA. Our international partners receive regular updates to ensure alignment with their sustainability policies.

## **4. Environmental Management Objectives**

### **4.1.Waste Minimization and Circular Economy**

Achieve a 95% recycling rate for scrap metals by 2028.

Reduce non-recyclable waste by 60% through advanced sorting and processing technologies.

### **4.2.Pollution Control and Prevention**

Implement measures to prevent soil, water, and air pollution from scrap handling and logistics.

Install spill containment systems and conduct weekly site inspections.

### **4.3.Energy and Resource Efficiency**

Transition to renewable energy for 40% of our operations by 2030.

Reduce fuel consumption by 25% through optimized logistics and vehicle maintenance.

### **4.4 Community Engagement and Social Responsibility**

Launch community recycling programs to promote local participation.

Foster transparent communication with stakeholders to build trust and collaboration.





## **5. Organizational Structure and Responsibilities**

### **5.1. Environmental Management Team**

Environmental Manager: Oversees EMPP implementation, compliance, and risk management.

Sustainability Officer: Monitors emissions, leads carbon credit initiatives, and engages communities.

Operations Supervisor: Ensures environmentally sound practices in daily operations.

Health and Safety Coordinator: Integrates environmental safety into workplace protocols.

### **5.2. Employee Roles and Accountability**

All employees are responsible for:

- Adhering to waste handling and pollution prevention protocols.
- Reporting environmental incidents within 24 hours.
- Participating in training and sustainability initiatives.

### **5.3 Contractor and Supplier Obligations**

Contractors and suppliers must:

- Sign environmental compliance agreements.
- Provide evidence of adherence to NEMA regulations.
- Adopt eco-friendly practices, such as using low-emission vehicles.





## **6. Environmental Risk Assessment and Management**

### **6.1. Identification of Environmental Aspects and Impacts**

Key aspects include:

- Waste Generation: Scrap metals, oils, and non-recyclable residues.
- Pollution Risks: Potential spills, leaks, or emissions during handling and transportation.
- Energy Use: High energy consumption in processing and logistics.
- Land Use Impacts: Potential soil degradation from storage facilities.

### **6.2. Risk Mitigation and Control Measures**

Spill Prevention: Deploy spill kits and secondary containment systems at all sites.

Emission Control: Use low-emission vehicles and monitor fuel efficiency.

Land Management: Conduct EIAs for new facilities and rehabilitate sites post-use.

Waste Tracking: Implement a digital tracking system to monitor waste from collection to disposal.







## **7. Operational Procedures for Scrap Management**

### **7.1. Scrap Collection and Sorting Processes**

- Source scrap from verified suppliers, ensuring no hazardous materials are accepted without proper documentation.
- Use automated sorting technologies to separate ferrous and non-ferrous metals, minimizing contamination.
- Conduct quality checks to ensure materials meet international standards for recycling.

### **7.2. Storage and Handling Protocols**

- Store scrap in covered, leak-proof areas to prevent runoff and soil contamination.
- Segregate hazardous materials (e.g., oils, batteries) in sealed containers compliant with NEMA standards.
- Label all storage units clearly to avoid mishandling.

### **7.3. Transportation and Logistics Management**

Optimize transport routes using GPS technology to reduce fuel consumption.

Use licensed transporters compliant with the Basel Convention for international shipments.

Conduct regular vehicle maintenance to minimize emissions.

### **7.4. Recycling and Disposal Procedures**

- Partner with NEMA-certified recycling facilities to process scrap metals.
- Dispose of non-recyclable waste at approved landfills, maintaining detailed disposal records.
- Provide clients with certificates of recycling to ensure transparency.





## **8. Carbon Management and Climate Action**

### **8.1. Carbon Footprint Assessment and Reduction**

- Conduct annual carbon footprint assessments using tools aligned with the Greenhouse Gas Protocol.
- Implement energy-efficient technologies, such as solar panels and LED lighting, at our facilities.
- Transition to electric or hybrid vehicles for 20% of our fleet by 2028.

### **8.2. Participation in Uganda's Carbon Credit Market**

Register recycling projects under the 2025 Climate Change Mechanisms Regulations to generate carbon credits.

Partner with the Ministry of Water and Environment to validate carbon offset projects.

Use carbon credit revenue to fund community environmental initiatives.





## **9. Training and Capacity Building**

### **9.1. Employee Training Programs**

Provide mandatory on boarding training on environmental regulations and waste handling.

Conduct quarterly workshops on spill response, energy efficiency, and carbon management.

Offer ISO 14001 certification courses for management staff.

### **9.2. Community Education and Outreach**

Launch “Recycle with Mkubwa” campaigns to educate local communities on recycling benefits.

Partner with schools to integrate environmental education into curricula.

Host annual community clean-up events to promote environmental stewardship.





## **10. Monitoring, Evaluation, and Reporting**

### **10.1. Key Performance Indicators (KPIs)**

Recycling rate: Target 95% by 2028.

Waste reduction: Achieve 60% reduction in non-recyclable waste by 2028.

Carbon emissions: Reduce emissions by 30% by 2030.

Community engagement: Reach 5,000 community members annually through outreach programs.

### **10.2. Environmental Audits and Inspections**

Conduct internal environmental audits every six months.

Engage third-party auditors annually to verify compliance with ISO 14001 and NEMA standards.

Perform weekly site inspections to identify and address potential risks.

### **10.3. Stakeholder Reporting and Transparency**

Submit annual environmental performance reports to NEMA and international partners.

Publish a sustainability report on our website, highlighting achievements and challenges.

Maintain an open-door policy for stakeholder feedback on environmental performance.





## **11. Emergency Preparedness and Response**

### **11.1. Incident Response Plan**

Develop a spill response protocol, including containment, clean-up, and reporting procedures.

Maintain spill kits and emergency response equipment at all facilities.

Establish a 24/7 incident reporting hotline (+256 417 889 401).

### **11.2. Emergency Drills and Training**

Conduct quarterly spill response and evacuation drills.

Train employees on first aid and hazardous material handling.

Coordinate with local authorities for major incident response.





## **12. Stakeholder Engagement and Community Involvement**

### **12.1. Community Partnerships and Initiatives**

Support local recycling cooperatives with training, equipment, and market access.

Fund community projects, such as tree planting and waste collection drives, to offset carbon emissions.

Establish a community advisory board to address local concerns and priorities.

### **12.2. Collaboration with International Partners**

Align with the environmental policies of international clients to ensure consistency.

Participate in global sustainability forums, such as the Hamburg Sustainability Conference, to share best practices.

Collaborate with international NGOs to fund environmental projects in Uganda.

## **13. Continuous Improvement and Innovation**

### **13.1. Plan Review and Updates**

Review the EMPP annually to incorporate new regulations, technologies, and stakeholder feedback.

Update objectives based on audit findings and performance metrics.

Engage employees in brainstorming sessions to identify improvement opportunities.

### **13.2. Innovation in Sustainable Practices**

Invest in research and development for advanced recycling technologies.

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Pilot projects for waste-to-energy conversion and eco-friendly packaging.

Partner with universities to explore innovative scrap management solutions.

## 14. Implementation and Resource Allocation

### 14.1. Budget and Resource Commitment

Allocate 10% of annual profits to environmental initiatives, including training, technology upgrades, and community programs.

Invest in renewable energy infrastructure, such as solar panels, for our facilities.

Hire dedicated environmental staff to ensure effective EMPP implementation.

## 15. Conclusion

Mkubwa Mixed Steel and Logistics LTD is dedicated to leading Uganda's scrap management industry with a commitment to environmental sustainability, regulatory compliance, and community empowerment. This EMPP provides a clear, actionable framework for achieving our environmental goals while meeting the expectations of our international partners. By fostering innovation, transparency, and collaboration, we aim to contribute to Uganda's sustainable development and set a standard for responsible business practices.

Authorized by ;

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## 16. Appendices

### 16.1 Glossary of Terms

EIA: Environmental Impact Assessment – A process to evaluate the environmental effects of a project.

NEMA: National Environment Management Authority – Uganda’s regulatory body for environmental management.

ISO 14001: International standard for environmental management systems.

Carbon Credit: A tradable permit representing one metric ton of CO<sub>2</sub> emissions reduced.

### 16.2 Legal References and Citations

National Environment Act, Cap 153 (2019).

National Climate Change Act, Cap 182 (2020).

National Climate Change (Climate Change Mechanisms) Regulations, 2025.

Waste Management Regulations, 2020.

Basel Convention on the Control of Transboundary Movements of Hazardous Wastes (1989).

ISO 14001:2015 Environmental Management Systems.

### 16.3 Contact Information

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