BLUE BERRIES NAMIBIA (PTY) LTD

Environmental and Social Management Plan

The Remainder (Creation Of Streets), as part of the Subdivision Plan of the Farm Divundu Townlands No. 1362 into Portions 8 to 15

Divundu Settlement, Okavango East Region, Namibia

April 2023





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CONSULTANT'S EXPERTISE

I.N.K Enviro Consultants cc is the independent firm of environmental consultants that has been appointed by Blue Berries Namibia (Pty) Ltd to conduct the ESIA process.

Immanuel N. Katali, the Environmental Assessment Practitioner holds a B.Arts (Honors) Geography, Environmental Studies and Sociology and has over seven years of relevant experience in conducting/managing Environmental and Social Impact Assessments (ESIAs), and Environmental Compliance/Monitoring Audits in Namibia. Immanuel is certified as an Environmental Assessment Practitioner under the Environmental Assessment Professionals Association of Namibia (EAPAN).

DECLARATION OF INDEPENDENCE AND DISCLAIMER

I.N.K Enviro Consultants cc herewith declare that this report represents an independent assessment of the proposed Blueberries subdivision activities, on the request of Blue Berries Namibia (Pty) Ltd.

The Environmental Consultant has prepared this report based on an agreed scope of work and acts in all professional manner as an Independent Environmental Consultant to Blue Berries Namibia (Pty) Ltd and exercises all reasonable skill and care in the provision of its environmental professional services in a manner consistent with the level of expertise exercised by members of the environmental profession.

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LIST OF ACRONYMS, ABBREVIATIONS AND UNITS

Acronyms / Abbreviations / Units	Definition
BID	Background Information Document
DAE	Department of Agricultural Engineering
DEA	Directorate of Environmental Affairs
EAP	Environmental Assessment Practitioner
ECC	Environmental Clearance Certificate
EIA	Environmental Impact Assessment
EMA	Environmental Management Act
ESMP	Environmental and Social Management Plan
ha	Hectares



1 INTRODUCTION

1.1 **Project Background**

Blueberries Namibia (Pty) Ltd (hereinafter referred to as "Namibia Berries") intends to apply for an Environmental Clearance Certificate (ECC) for the remainder (creation of streets), as part of the subdivision plan of the Farm Divundu Townlands no. 1362 into portions 8 to 15, with the aim of developing irrigation activities on a 253.9 hectares (ha) piece of land. The proposed project is located in Divundu Village, Kavango East Region, Namibia.

Two separate Environmental Clearance Certificate (ECC) Applications have been submitted to the Ministry of Environment, Forestry and Tourism (MEFT) as per the following:

- The Proposed Blueberries Irrigation Activities.
- The Proposed Remainder (Creation of Streets), as Part of the Subdivision Plan of The Farm Divundu Townlands No. 1362 into Portions 8 to 15.

This report focuses on the proposed remainder (creation of a street) for the proposed blueberries irrigation project and has been compiled as part of the EIA process that is being undertaken. The ESIA process is conducted on the request of the Ministry of Urban and Rural Development (MURD), as one of the requirements, prior to the approval of the subdivision plans for the proposed irrigation activities.

Prior to the commencement of the project, an environmental clearance is required based on an approved Environmental and Social Impact Assessment (ESIA) and Environmental and Social Management Plan (ESMP). The report describes the Environmental and Social Impact Assessment (ESIA) process being followed and provides an overview of the affected environment. It includes an assessment of the environmental impacts that the proposed activities are likely to have and sets out the consultants' recommendations. The proposed management and mitigation measures related to the proposed subdivision activities are documented in an Environmental and Social Management Plan (ESMP).

I.N.K Enviro Consultants cc (I.N.K), an independent firm of environmental consultants, has been appointed to undertake the Environmental and Social Impact Assessment process for this project. For more details on the ESIA process that was followed, please refer to Section 1.3.



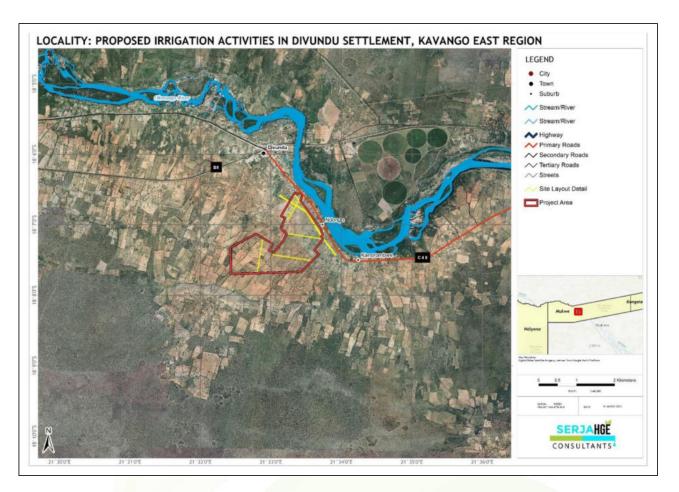
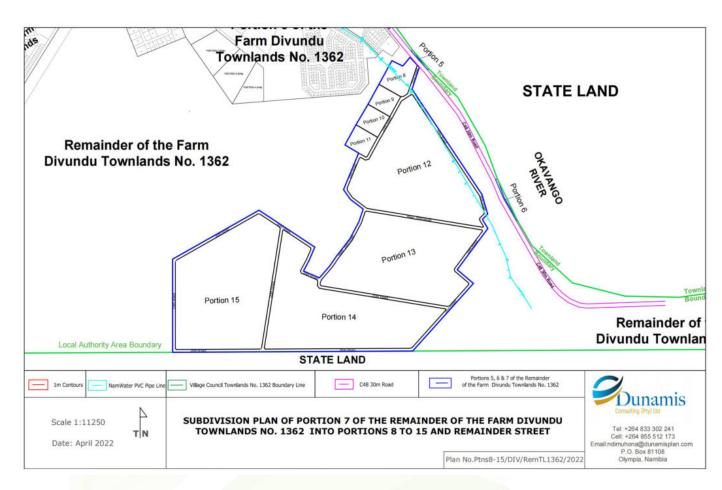
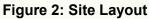


Figure 1: Locality Map







1.1.1 ESIA Team

I.N.K Enviro Consultants cc is the independent firm of consultants that has been appointed by Namibia Berries to undertake the Environmental and Social Impact Assessment and related processes.

Immanuel N. Katali, the Environmental Assessment Practitioner holds a B.Arts (Honors) Geography, Environmental Studies and Sociology and has over seven years of relevant experience in conducting/managing Environmental and Social Impact Assessments (ESIAs), and Environmental Compliance/Monitoring Audits in Namibia. Immanuel is certified as an Environmental Assessment Practitioner under the Environmental Assessment Professionals Association of Namibia (EAPAN).



2 IDENTIFICATION OF APPLICABLE ENVIRONMENTAL AND SOCIAL GUIDELINES

2.1 Introduction

The Republic of Namibia has five tiers of law and several policies relevant to environmental assessment and protection, which includes:

- The Constitution
- Statutory law
- Common law
- Customary law
- International law

Key policies currently in force include:

- The EIA Policy (1995).
- Namibia's Environmental Assessment Policy for Sustainable Development and Environmental Conservation (1994).

As the main source of legislation, the Constitution of the Republic of Namibia (1990) makes provision for the creation and enforcement of applicable legislation. In this context and in accordance with its constitution, Namibia has passed numerous laws intended to protect the natural environment and mitigate against adverse environmental impacts.

2.2 Legislation Applicable to the Proposed Subdivision Activities

- The Constitution of the Republic of Namibia as Amended: Article 91 (c) provides for duty to guard against "the degradation and destruction of ecosystems and failure to protect the beauty and character of Namibia." Article 95(I) deals with the "maintenance of ecosystems, essential ecological processes and biological diversity" and sustainable use of the country's natural resources.
- Environmental Management Act No. 7 of 2007 (EMA) and EIA Regulations GN 28, 29, and 30 of EMA (2012): GN 29 Identifies and lists certain activities that cannot be undertaken without an environmental clearance certificate. GN 30 provides the regulations governing the environmental assessment (EA) process.
- Local Authorities Act No. 23 of 1992: The Local Authorities Act prescribes the manner in which a town or municipality should be managed by the Town or Municipal Council.



3 ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN

3.1 Aims

The aim of the Environmental and Social Management Plan (ESMP) is to detail the actions required to effectively implement mitigation and management measures. These actions are required to minimise negative impacts and enhance positive impacts associated with the connstruction and operations.

It is important to note that an ESMP is a living document in that it will be updated and amended as new information (e.g. environmental data), policies, authority guidelines, technologies and proposed activities develop. The conceptual management measures proposed to mitigate the potential impacts are detailed in the action plans below.

3.2 Roles and Responsibilities

It is the responsibility of Namibia Berries to implement the measure (commitments) below and to ensure that all actions are carried out. The successful implementation of these measures is however dependent on clearly defined roles and responsibilities. The company will ensure that it will establish and document clearly defined roles and their associated responsibilities in relation to its key activities.

3.3 Training and Awareness

The purpose of the job specific environmental awareness training is to ensure that employees are equipped to implement the actions committed to in the ESMP. The staff involved in operations will receive training regarding the requirements of this ESMP.

Four main forms of training will be provided on site:

- Site induction
- Environmental management training general and targeted
- Environmental Toolbox Talks
- Poster awareness

The following will be done to ensure all employees, contractors, suppliers and visitors receive the appropriate training/awareness:



3.3.1 Environmental Site Induction

All new members of staff receive a Environmental Induction along with the obligatory Health & Safety induction. The induction gives a general overview of the environmental challenges faced by the project, how we are managing them, and general tips for reducing our impact in the workplace.

The main reason for environmental induction is to encourage new staff to be environmentally aware right from the beginning of their employment. This will ensure that environmental initiatives are successful by eliminating bad habits from the start.

Before working on site, all personnel and sub-contractors will undertake a site induction incorporating environmental requirements. The induction will address a range of environmental awareness issues specific to the Irrigation Project.

As a minimum, training shall include:

- Explanation on the importance of complying with the ESMP and environmental implications should the ESMP not be effectively implemented.
- Discussion of the potential environmental impacts of operational activities, recognition of environmental risks e.g. oil spill, paint etc. and how to control these risks.
- The benefits of improved personal performance, understanding of what to do in case of an environmental event or exposure.
- Employees' roles and responsibilities, including emergency preparedness.
- Explanation of the mitigation measures that must be implemented when carrying out operational activities.
- Explanation of the requirements of the ESMP and its specification (no-go areas, etc.)
- Explanation of the management structure of individuals responsible for matters pertaining to the ESMP.

The training will generally be prepared by the Environmental Manager or delegated responsible party.

3.3.2 Environmental Awareness training

Targeted environmental management training will be provided to individuals or groups of workers with a specific authority or responsibility for environmental management or those undertaking an activity with a high risk of environmental impact. This environmental training will aim to achieve a level of awareness and competence appropriate to their assigned activities.



This training will take place monthly i.e., all staff will undergo awareness training at least once a month.

3.3.3 Toolbox talks

'Toolbox' talks will assist in communicating relevant information to the workforce and providing feedback on issues of interest or concern. Toolbox talks shall be held on a weekly basis. Environmental topics shall (as far as possible) be sent out to all employees and contractors to be discussed at the toolbox talks.

Environmental work procedures detail the required subjects to be addressed in 'toolbox' talks topics may also include:

- The efficient use of materials.
- Waste management, minimisation and recycling.
- Management of hazardous materials.
- Protection of Biodiversity
- Management of pollution.
- Work methods.

Records of toolbox talk topics and persons attending will be retained on site in a register.

3.4 Management and Mitigation Measures

The management and mitigation measures for the proposed irrigation projected are outlined in the table below.

Table 1: Action Plans

Environmental Issue	Management & Mitigation Measures
Construction phase	
Air quality/Dust	Keep road construction footprint to a minimum.
	Ensure all construction equipment is subject to an Inspection & Maintenance programme to ensure proper combustion.
	Should dust be generated by the road construction activities or due to cleared land then dust suppression will be carried out.
Noise	Restrict construction activities to daylight hours.



	Refer to operations phase for general noise management measures.
Waste Management	Refer to operations phase for general waste handling and management requirements.
waste management	
	Ablution Facilities with septic tanks should be made available during construction. Personne may not relieve themselves in the area.
	may not relieve themselves in the area.
Visual	No litter or waste accumulation will be permitted on site.
	Clear demarcates sites and signage to ensure adequate waste management response and safety within the project site.
Biodiversity	Environmental awareness for all employees to be included during inductions. Regular awareness training will be carried out
	The footprint of the area will be minimised as far as is practically possible.
	Management will implement a zero tolerance policy concerning the killing or collecting of any plants or animals. This applies to people directly employed by Namibia Berries as well as any contractors working on their behalf. Develop a policy that limits independent movements of all workers into the veld that could create suspicion of poaching. Strictly prevent poaching harvesting or possession of any such wildlife resources without an appropriate permit.
	Keep removal of protected tree species to a minimum.
	Optimise the total size of the irrigation area by carefully considering the realistic productive capacity of the soils (use only the area that is needed to produce the target production).
	Do not clear one contiguous block of vegetation; rather follow the principle of patch dynamics and clear multiple smaller blocks, each divided from the next by a patch of natural bush.
Heritage/Archaeology	In the event that archaeological resources are discovered during construction, a chance find
	emergency procedure will be implemented which includes the following:
	o All work at the find will be stopped to prevent damage;
	o An appropriate heritage specialist will be appointed to assess the find and related impacts; and
	o Permitting applications will be made to the necessary authorities, if required.
Health and Safety	Suitable First Aid equipment must be provided for use by qualified first aid personnel.
	Suitable shaded facilities must be provided for employees to use during breaks.
	Clean drinking water must be provided in sufficient quantities at all times.
	Heat stress awareness training must be provided.
	An effective emergency response procedure must be in place to be initiated by competent personnel.
Operations phase	
Air quality	Develop and implement a complaints register to record any 3rd party complaints relating to the release of dust from exposed areas. Complaints must be investigated and actions developed.
	Cover piles soil.



	Pay attention to the dust created: use water or dust suppressants when substantial dust is blowing offsite.
Noise	General construction and operational activities, following good engineering practice should be applied including:
	 Regular maintenance of all diesel-powered equipment.
	 Enclosure of major sources of noise.
	 Following of good design philosophies for vibrating structures that are known to be noisy.
	Noise-generating activities limited to daytime hours since noise impacts are most significant during the night.
	Minimise individual vehicle engine, transmission and body noise or vibration through the implementation of an equipment maintenance programme and minimise the need for trucks or equipment to reverse.
Groundwater	Monitor groundwater levels.
	Maintain equipment to prevent leakages of contaminants.
	Dispose of materials properly at a suitable disposal site.
Surface water	Minimise the project footprint as far as possible.
	If necessary, implement stormwater control measures that prevent water from pooling on site.
	Maintain natural water channels (particularly the drainage lines)
	Storm water management, construction of infrastructure to contain contact and waters.
Biodiversity	Environmental awareness for all employees to be included during inductions. Regular awareness training will be carried out.
	Namibia Berries will implement a zero-tolerance policy with regards to the killing or collecting of any biodiversity. This applies to people directly employed by Namibia Berries as well as any contractors working on its behalf.
Waste and Sewerage Management	Ensure proper removal of general waste from site and disposal at licensed disposal site. Obtain records of safe disposal.
	Recycling will be promoted on site.
	Bins with labels according to waste type, and with lids in order to prevent wind-blown litter, will be provided at strategic locations through the site and will be emptied regularly in order to ensure no overflows.
	No litter will be permitted on site.
	No waste will be disposed of on site. Waste will be transferred to the nearest approved landfill site.
Visual	Carry out regular maintenance in order to maintain visual integrity of the site.
	No litter or waste accumulation will be permitted on site.
	Ensure immediate clean-up of all spills/leakages
Social and Economic	Local people must be preferentially selected for the training academy to encourage social



	growth and development. Management should work closely with the Village Council to manage in-migration, and the effects thereof.
	Operate and publicise among all site workers and visitors a detailed safety and security plan for the project.
ESMP implementation	A person must be appointed to be responsible for environmental management and compliance.
	All staff must be made aware of, and familiar with, site operations during operations, the key environmental issues and consequences of non-compliance to the ESMP.
	All personnel must undergo induction on environmental issues and ESMP specifications. The induction must include awareness of activities and issues that could impact neighbours. Emergency procedures also need to be included in the training
	Ensure ongoing awareness and compliance.

