2023

THE ENVIRONMENTAL MANAGEMENT PLAN FOR THE OPERATION AND MAINTENANCE OF AN EXISTING 132KV OTJIKOTO – OHORONGO TRANSMISSION POWERLINE INCLUDING OHORONGO SUSBTATION.



THE DOCUMENT IS PREPARED BY NAMPOWER'S SHEW SECTION. MAY 2023

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1 LIST OF TERMS, ACRONYMS AND ABBREVIATIONS

EAP	Environmental Assessment Practitioner
ECC	Environmental Clearance Certificate
EIA	Environmental Impact Assessment
EMA	Environmental Management Act no 7 of 2007
EMP	Environmental Management Plan]
GIS	Geographical Information System
HIV/AIDS	Human immunodeficiency virus/ acquired immunodeficiency
syndrome	
MEFT	Ministry of Environment, Forest and Tourism
NHC	National Heritage Council
SHE	Safety, Health and Environment
SHEW	Safety, Health, Environment and Wellness
kV	Kilovolt

2 INTRODUCTION

In order to carry out its mandate of transmission of electricity, NamPower has transmission networks across all regions countrywide. The continuous operation of the 132kV Otjikoto – Ohorongo powerline and Ohorongo Substation including other powerlines and substations allow NamPower to provide uninterrupted supply of electricity to regions in order to improve the living conditions of Namibian citizens and to enable economic development.

2.1 Project description

The 132 kV Otjikoto to Ohorongo powerline transmit power through an overhead line system from Otjikoto substation to Ohorongo substation. The 132 kV Otjikoto to Ohorongo is 42.2 km in length, have Guyed Steel Monopole structures and was constructed in 2010. The Ohorongo Substation covers a footprint of about 601m2.

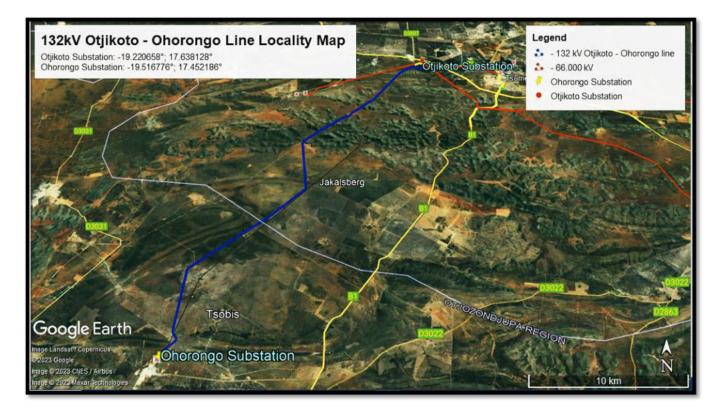


Figure 1: Locality map showing the 132kV Otjikoto - Ohorongo transmission line

2.2 General area description

The 132Kv line (Ohorongo-Otjikoto) passes through 1 vegetation type – Mountain Savannah or Karstveld. Although there are no true rivers in the area the main ephemeral rivers draining the general area flow westwards e.g. Omuramba Owambo (north of Tsumeb) and north-eastwards Omuramba Omatako (east of Tsumeb) (Cunningham, 2015).



Figure 2. Typical Karstveld along the route between Ohorongo and Otjikoto Substations.

The entire route of this line is of low environmental sensitivity, with the exception of karst hills around the Tsumeb area. The impact of most common line activities such as inspections and general maintenance activities would be site specific and have a relatively small environmental "footprint" and is not expected to have a major impact on the environment.

3 OBJECTIVES AND SCOPE OF THIS ENVIRONMENTAL MANAGEMENT PLAN (EMP)

The operation and maintenance of the transmissions line and station can have a negative impact on the receiving environment. However, the impacts are limited to the line servitude. It is thus important that good management measures are implemented to ensure that environmental damage is minimized. This Environmental Management Plan (EMP) seeks to manage and keep to a minimum the negative impacts and at the same time, enhance the positive impacts.

The scope of this EMP include all activities associated with the operation and maintenance of the transmission line and station. It is necessary to highlight that the EMP is a living document that should be periodically reviewed and updated. It must also be noted that the EMP should be read in conjunction with laws and regulations outlined in section 5, Table 1 and all other applicable laws.

The aim of this EMP is to detail the management actions required to implement the mitigation measures identified thereby ensuring that any operational phase activity is carried out in a manner that takes cognisance of environmental protection and is in line with legal.

This EMP has the following objectives:

- To outline mitigation measures to be implemented during the operation phase, in order to manage and minimize the extent of environmental impacts.
- Minimize negative impacts and enhance positive impacts associated with the operations.
- To ensure that the operational activities do not result in undue or reasonably avoidable adverse environmental impacts, and ensure that any potential environmental benefits are enhanced.
- To identify key personnel who will be responsible for the implementation of the measures, outline functions and responsibilities.
- To propose mechanisms for monitoring compliance and preventing long term or permanent environmental degradation.
- To ensure that the concerns and complaints of Interested and Affected Parties (I&APs) with regards to the operational and maintenance activities are addressed effectively and timely.
- Ensure compliance to legislative requirements.

4 POLICY AND LEGISLATIVE FRAMEWORK

Table 1: The legislative requirements which are applicable to the operational and maintenance activities include but not limited to:

 line with the following principles: Interested and affected parties should have an opportunity to participate in decision making Listed activities should be subject to an EIA
 Polluter should pay for rehabilitation Pollution should be minimized Pollution should be minimized Pollution should be minimized Environmental assessments should be carried out for listed activities. The proposed activity can be classified under the following range of activities: Generation of electricity Transmission of electricity These sections details the process to be followed in order to obtain a clearance certificate. All existing listed activities must obtain a clearance certificate within one year of the law coming into effect. Therefore, all existing activities which Statisting activities which
3:

EMA Regulations GN 28-30 (GG 4878) (February 2012)	 Listed activity: 5.1 6 – 9; 13; 15; 21 -24 Any other applicable sections 	 This activity can be considered as electricity generation and transmission. These sections details the process to be followed in terms of producing an Environmental Assessment and this process should be adhered to during the generation of information for this document.
No. 156 Labour Act, 1992: Regulations relating to the health and safety of employees at work .	All applicable regulations	All regulations applicable to different activities must be complied to.
Labour Act no 11 of 2007	 Section 3 Section 4 Section 9 Section 39 – 42 All other applicable sections 	 Children under the age of 16 may not be employed Forced labour may not be used. Basic conditions of employment as stipulated by the law must be met. The employer shall ensure the health and safety of all employees and non-employees on site. Employees must fulfil their duties in order to ensure their own health and safety and that of other employees and persons. Employees may leave the work site if reasonable measures to protect their health are not taken.
Electricity Act no 4 of 2007	Section 33	 Installations used for the provision of electricity should be operated with due compliance with the requirements of laws relating to health, safety and environmental standards. Therefore – any company involved within the Electricity

Water Act no 54 of 1956	 Section 21 and 132 Section 23 All other sections applicable to different activities. 	 Supply Industry must adhere to the laws covering the previously stated aspects or stand to lose their licenses to operate. Conditions in terms of the disposal and management of effluent are to be adhered to. Any person causing pollution to a water source shall be guilty of an offence.
Public and Environmental Health Act no 1 of 2015	 Section 52 Section 53 All other sections applicable to different activities. 	 A person generating waste must ensure that the waste generated is kept and stored under conditions that causes no harm to human health or damage to the environment. Waste must only be disposed of at a waste disposal site, including an incinerator approved by the local authority concerned.
Water Resources Management Act no 24 of 2013	 Section 89 All other sections applicable to different activities. 	• The owner or occupier or other person in control of land where an incident that causes or is likely to cause a water resource to be polluted must take all reasonable measures to contain and minimize the effects of the incident; and to clean up polluted areas and remedy the effects of the incident.
Hazardous Substances Ordinance 14 of 1974	 Section 27 All other sections applicable to different activities. 	 To provide for the control of substances which may cause injury or ill-health to or death of human beings, by reason of their toxic, corrosive, irritant, strongly sensitizing or flammable nature or the generation of pressure thereby in certain circumstances; To provide for the division of such

		 substances into groups in relation to the degree of danger; To provide for the prohibition and control of the importation, manufacture, sale, use, operation, application, modification, disposal or dumping of such substances; and To provide for matters connected therewith.
Fertilizers, farm feeds, agricultural remedies and stock remedies Act no 36 of 1947	 Definitions Section 7 Section 10 	 Arborocide application is defined as an agricultural remedy under this Act Only registered pesticide may be used. May only buy herbicides in a container that complies with the prescribed requirements and is sealed and labelled.
	 All other sections applicable to different activities. 	 Only allowed to use herbicides in the prescribed manner. Land owners must be notified about applications, and the following information must be supplied: Purpose of administration Registered name and number of the product Precautions to be taken before, during and after each administration.
The Nature Conservation Ordinance (1975) as amended through the Nature Conservation Amendment Act of 1996.	Chapter 11: Game Parks, Nature Reserves, Conservancies and Wildlife Councils	• Permits are required to enter the National Park. Permits are also required for the removal of any protected plant or tree. It also stipulates that no damage may be done to any object of geological, ethnological, archaeological, historical or

		other scientific interest without the appropriate permits.
National Heritage Act No 27 of 2004	 Section: 46, 48, 55 All other sections applicable to different activities. 	 All heritage resources are to be identified and either protected or removed/mitigated with a permit from the National Monuments Council, before any development may take place A chance find procedure should be followed in case of discovery of a heritage resource.
Soil Conservation Act no 76 of 1969	 Section 4 Section 13 Section 21 And other applicable sections 	 Institutions may be ordered by the relevant Minister to construct soil conservation works when and where necessary. Fire protection schemes may be implemented to regulate the prohibition of veld burning as well as the prevention, control and extinguishing of veld and forest fires. It is illegal to damage, destroy / fail to maintain any soil conservation works; fire belts; works constructed in terms of a fire protection scheme.
Forest Act no 12 of 2001	 Section 132 Section 41 And other applicable sections 	 Vegetation may not be removed within 100 m of a river, stream or water course A person shall be liable for damage caused by any fire which arises as a result of activities carried out on site without having taken reasonable measures to prevent a fire.

5 ROLES AND RESPONSIBILITIES

It is the responsibility of NamPower and/or contractor to ensure that all the environmental management actions are carried out effectively and timeously. It is important to note that the

successful implementation of the EMP is, however dependent on clearly defined roles and responsibilities by several stakeholders. Below are the key employees that are responsible for the management of environmental and social issues during the operational phase:

Responsible person	Responsibilities
The Area Superintendent	Is responsible for the enforcement of the EMP
	• To ensure that environmental requirements are adequately covered in any external service provider contracts.
	• To ensure that SHE requirements are included in the tender documents sent to the contractors. A copy of this EMP should also form part of the tender documents.
	• To ensure that corrective actions are implemented for non- compliances.
	 To ensure that appropriate records and information regarding compliance with environmental requirements are maintained.
	• To ensure that the line and station remain in compliance with the requirements of this EMP, through regular communication and monitoring.
	• To ensure that all incidents, accidents and complaints are reported. To also ensure that incidents and accidents are investigated to prevent re-occurrence.
	• Ensuring that the work being done does not create a nuisance to any being working, residing or living on adjacent properties or within the immediate surroundings of the site.
Project Manager	Is responsible for the enforcement of the EMP.
	• To ensure that SHE requirements are included in the tender documents sent to the contractors.
	• Must ensure that the contractor remains in compliance with

Table 2: The roles and responsibilities for operational activities:

	the requirements of this EMP.
	• Ensuring that the work being done does not create a nuisance to any being working, residing or living on adjacent properties or within the immediate surroundings of the site.
	• To ensure that all incidents, accidents and complaints are reported. To also ensure that incidents and accidents are investigated to prevent re-occurrence.
NamPower SHEW	• To ensure that all requirements with regards to this EMP are enforced by contractors/NamPower's employees.
	 Communicate NamPower SHEW requirement to the contractors and NamPower employees.
	 Provides SHEW inductions to NamPower and contractor employees.
	 Implement monitoring, conduct inspections and audits in consultation with the Project Manager/Area Superintendent.
	 Document and communicate monitoring, audit and inspection findings to project manager and area superintendent.
	• Communicate the final inspection report to the Project manager on contractor compliance to the EMP before the project close-off and final payment is made to the contractor.
Contractor	Is responsible for the enforcement of the EMP
	• To appoint a SHE officer responsible for the implementation of this EMP.
	• To ensure that all tasks undertaken under the scope of work, are in accordance both with NamPower's SHEW policies and procedures as well as to the requirements of this EMP.
	• Ensure that employees are regularly trained and awareness built relating to environmental and social management.

• To ensure that all incidents, accidents and complaints are reported to the project manager. The contractor to ensure
that incidents and accidents are investigated to prevent re- occurrence.
 Ensuring that all employees receive a SHEW induction before the start of the project.
• Ensuring that the work being done does not create a nuisance to any being working, residing or living on adjacent properties or within the immediate surroundings of the site.

6 DESCRIPTION OF OPERATIONAL ACTIVITIES TO BE UNDERTAKEN AND ASSOCIATED IMPACTS

Table 3: The operation and maintenance may include but not limited to the following activities and their associated socio-economic and environmental impacts.

Activity	Description	Associated potential impacts
General functioning of the station and transmission line.	 Physical presence and functional characteristics of the station and associated line. 	 Animal (including birds) mortalities through collisions and electrocution. Destruction of avifauna, especially protected spp. Visual impact. Community impacts in a form fatalities or injuries caused by electrocution. Meeting electricity demand (positive impact).
Maintenance of the station and line	 The maintenance of the station and line entails: General equipment 	 Soil and water contamination Waste generation leading to filling up of landfill space

	 repairs. Replacement and servicing of batteries. Maintenance of electrical equipment such as transformers, relays and capacitors. Maintenance of electrical equipment such as transformers, relays and capacitors. Maintenance of electrical equipment such as transformers, relays and capacitors. Maintenance of electrical equipment such as transformers, relays and capacitors. Maintenance of electrical equipment such as transformers, relays and capacitors.
Construction	 capacitors. Construction or repairing of access roads. Construction include the following activities: Construction or refurbishment of buildings (digging and setting of foundations, digging of cable trenches and other
	 activities). Installation or extension of boundary fences Upgrade of electrical equipment (either in size, capacity or technology). Personnel conduct in surrounding communities. Waste generation leading to filling up of landfill space Employment of casual workers Loss of biodiversity reduces habitat availability and food sources for many animals. Loss of sensitive plants and habitats. Loss or damage of heritage

		resources.
Periodic inspections and monitoring	• Replacement, cleaning and maintenance of station and line components.	 Soil and ground water contamination as a result of oil spills Soil contamination as a result of improper waste handling and disposal. Loss of biodiversity if existing access roads are not put to use.
Use and storage of Hazardous Substances	 Storage of hazardous material. 	 Possible oil spills and soil contamination from electrical units such as transformers.
Installation of Optic Fibre networks	 Design, Supply, Delivery, Installation and Commissioning of Optic Fibre networks for communication purposes. 	 Loss of biodiversity Soil contamination as a result of improper waste handling and disposal. Loss of sensitive plants and habitats.
Vegetation Management	 Removal of trees and bushes to maintain access to the line servitude. Removing weed from the substation yard. 	 Destruction of vegetation; vertebrate fauna; avifauna especially protected spp. and sensitive habitats. Conflict with landowners Loss of topsoil Soil and water contamination Loss or damage of heritage resources. Soil erosion

	Destruction of sensitive habitats
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7 MANAGEMENT AND MITIGATION MEASURES

In order to ensure that the potential impacts are eliminated and/or minimised, it is necessary to ensure that the various activities related to the operation of the powerline are adequately managed and monitored. Table 4 below outline mitigation measures as well as objectives to be achieved. A responsible person (s) have been assigned to each mitigation measure (s).

Table 4: Proposed mitigation measures

ASPECT	MANAGEMENT AND MITIGATION MEASURES/COMMITMENTS	RESPONSIBLE PERSON
Safety Health and Environmental (SHE) Awareness	 All employees should undergo SHE induction before work commences onsite. All employees are to be made aware of their individual roles and responsibilities in achieving compliance with the EMP. SHE toolbox talks to be conducted and records to kept onsite. Signage must be placed on and around the site. 	 Area superintendent Project manager SHEW Contractor
Safety Management	 Develop and implement an occupational health and safety system that comprises key elements such as risk assessment and safe working procedure. NamPower SHEW requirements must be complied with. All work activities to be done under the supervision of a competent person. Appropriate warning signs must be placed on the facilities. SHE file to be submitted in case of projects in accordance with NamPower SHEW requirements. 	 Area superintendent Project manager Contractor
Fire Management	• Eliminate the presence of potential sources of ignition and provide appropriate equipment to minimize fire risk.	Area superintendent

ASPECT	MANAGEMENT AND MITIGATION MEASURES/COMMITMENTS	RESPONSIBLE PERSON
	 Fire extinguishers to be readily available in vehicle or onsite in case of camping. Regular servicing of fire extinguishers. Firefighting training to be provided to employees. Maintain fire breaks. 	Project managerContractor
Air Quality	 Dust generation from all activities must be minimised. Excavation, handling and transportation of erodible materials shall be avoided under high wind conditions or when a visible dust plume is present. Speed limit to be enforced to control dust emissions. Dust suppression measures shall be implemented when necessary. Vehicle, machinery and equipment shall be maintained in good working order in order to minimise exhaust fume emissions. Vehicle, machinery and equipment must be serviced by competent personnel and records must be kept onsite 	Area superintendentProject managerContractor
Resources Efficiency	Minimise water wastage and record water usage.	Area superintendent

ASPECT	MANAGEMENT AND MITIGATION MEASURES/COMMITMENTS	RESPONSIBLE PERSON
	Avoid wasteful use of materials.	Project manager
	Source goods and services locally were possible	Contractor
Waste Management	Minimise the generation of waste by applying the waste hierarchy.	Area superintendent
	No littering is allowed on site.	Project manager
	 No burning, burying or dumping of any waste materials shall be permitted onsite. 	Contractor
	• Labelled waste bins with lids must be provided at substations or/and campsites (in case of a project) for all waste streams and ensure that waste is disposed at nearest approved waste disposal site.	
	Ensure that waste segregation is done at source.	
	• Waste must be disposed at a licensed waste facility.	
	 Hazardous waste shall be disposed of at a registered hazardous waste disposal site. 	
	• Safe disposal certificates for hazardous waste must be kept in the SHE file.	
	Concrete waste must not be dumped on site.	

ASPECT	MANAGEMENT AND MITIGATION MEASURES/COMMITMENTS	RESPONSIBLE PERSON
Wastewater management	 Water containing environmental pollutants shall be collected and removed from site. No waste water runoff or uncontrolled discharges from the site/working areas shall be permitted. Mobile toilets or septic tanks should be used in remote areas. 	 Project manager Contractor Area superintendent
Hazardous Substances	 The use, handling, storage and disposal of the hazardous chemical must be in accordance with the MSDS. Containers must be clearly marked to indicate contents and quantities. Hazardous substances storage areas must be bunded. A bund should be able to contain 110% of the volume of the largest container stored within it. Diesel and other liquid fuel must be stored in appropriate storage tanks or in bowsers with secondary containment. Inspect and maintain hazardous storage areas to avoid overflows. Ensure that drip trays are available, to be use in case of leaking equipment. Spill kit and absorbents must be available onsite at campsite. Hazardous substance storage areas must display safety symbolic signs. 	 Area superintendent Project manager Contractor

ASPECT	MANAGEMENT AND MITIGATION MEASURES/COMMITMENTS	RESPONSIBLE PERSON
	All spills must be reported, cleaned and remediated to in compliance with SHEW requirements.	
Social Impact	 NamPower/ Contractor must sign land permission form and agreement with land owners 14 days prior to commencement of work onsite. Employees should limit their contact with permanent residents of the area. Employees should be properly educated about the impact of HIV / AIDS. The use of intoxicating liquor or drugs of any kind by the employees is strictly prohibited. Ensure that all queries and complaints are documented, investigated and dealt with. A register shall be kept of all complaints from stakeholders, this should also the actions taken to rectify the complaints. 	 Area Superintendent Project Manager All NamPower employees Contractor
Archaeology	 Should a heritage site or archaeological site be uncovered or discovered during the operation phase, a "change find" procedure in appendix 4 should be applied. Any chance finds must be reported to NamPower environmental section. 	 Area superintendent Project Manager SHEW Contractor

ASPECT	MANAGEMENT AND MITIGATION MEASURES/COMMITMENTS	RESPONSIBLE PERSON
Fauna and Flora	 Ensure that the site is kept clean and free of waste. Ensure that the line structures are maintained such that the conductors do not hang low to avoid potential human and animal life losses. No harvesting or damaging of plants is allowed. Poaching or capturing of any animal (wild or domestic) is prohibited. Bird nests may not be disturbed unless interfering with the normal operation of the line/station. No domestic animals may be kept onsite (in case of camping) as they can introduce diseases or interbreed with the animals occurring naturally in the area. Vehicles driving along the lines should engage four wheel drive to prevent spinning and consequent impacts on soil surface. Do not destroy, damage, collect any protected flora species that may be encountered servitude operations unless interfering with the normal operation of the line. Only remove/prune flora directly affecting the transmission line; 	 Area superintendent Project Manager Contractor

ASPECT	MANAGEMENT AND MITIGATION MEASURES/COMMITMENTS	RESPONSIBLE PERSON
	 Identify potential bird collision prone areas (i.e. habitats) during inspections. Install bird flight diverters (BFD's) and anti-perching devices (APD's) to the identified collision potential areas. Monitor all bird mortalities encountered under the transmission line. All wildlife and electrical infrastructure interactions such as (animal/bird deaths) must be reported to the SHEW section. 	
Water Resources	 Care must be taken to ensure that pollution of water does not occur. Naturally occurring water resources may not be used for any personal hygiene. Water may only be taken from a private or government property based on an agreement between the NamPower, contractor and custodian of the water source. 	 Area superintendent Project Manager Contractor
Erosion	 Implement and maintain erosion control measures along the access route in erosion prone areas. Rehabilitate eroded areas 	Area superintendentProject ManagerContractor
Campsite Establishment (should there be a need	Adequate ablution facilities must be provided onsite in relation to the number of employees.	Area superintendentProject Manager

ASPECT	MANAGEMENT AND MITIGATION MEASURES/COMMITMENTS	RESPONSIBLE PERSON
for camping, mostly during projects)	 Ablution facilities must not be located within 100m of any river, stream channel, pan, dam or borehole Non-employees are not allowed to reside at the campsite. Fire extinguishers, first aid kits, assembly point, and emergency numbers must be available onsite. Waste must be managed in accordance with waste management requirements outlined in this EMP. 	Contractor
Manual and Mechanical Vegetation Removal	 Obtain a permit from the Ministry of Environment, Forestry and Tourism to remove protected trees as per the Forest Act No. 12 of 2001. Measures must be put in place to avoid erosion especially at rivers, stream channel crossings, and at places where existing erosion scars and dongas are encountered to avoid any further erosion. Avoid mechanical bush clearing in sensitive areas (sensitive areas are in Annexure 1). Measures must be put in place to preserve the topsoil structure The disturbed soil must be levelled. Do not remove wood cut on site as this would affect the recycling of nutrients locally as well as lead to a potential industry in firewood targeting the better 	 Area superintendent Project Manager SHEW Contractor

ASPECT	MANAGEMENT AND MITIGATION MEASURES/COMMITMENTS	RESPONSIBLE PERSON
	quality tree species.	
	 Where clearing is done near a river, the contractor/NamPower must ensure that no felled bushes/branches/shrubs are left behind in the riverbed. No burning of bush cleared materials is allowed onsite. Manual and mechanical vegetation removal should be done in accordance with NamPower Procedures. Avoid the cutting down of protected tree species [Forestry Ordinance No. 37 of 1952) not directly affecting the power lines during the line clearing operation. 	
Herbicide Use	 Ensure that an appropriate and approved herbicide is use. Correct timing and methods must be used. Prevent the application of selected herbicide(s) in sensitive areas. Sensitive areas are known/expected to have higher biodiversity. Avoid the spraying of protected tree [Forestry Ordinance No. 37 of 1952) not directly affecting the power lines during the line clearing operation. Eradicate all invasive alien species potentially associated with the line/station. This would indicate overall environmental commitment. Avoid spraying herbicide during windy days/periods (See the general product requirements for herbicide used) as this could affect non-target areas and 	 Area superintendent Project Manager SHEW Contractor

ASPECT	MANAGEMENT AND MITIGATION MEASURES/COMMITMENTS	RESPONSIBLE PERSON
Site Rehabilitation (progressive and post rehabilitation)	 species. Avoid spraying, removing and/or approaching trees with vulture (and other larger raptors) nests along the route (if they are not affecting the line). Implement strict control over the storage, protective measures & application of the selected herbicide(s) throughout. Always consult and adhere to the MSDS requirements for the herbicide Herbicide must be handled in accordance with the requirements outlined in NamPower Procedures. Progressive rehabilitation especially when there is project work in progress. Post projects rehabilitation must also be done. All materials, equipment and waste must be removed from site. A post construction audit prior to the contractor leaving site must be conducted. SHEW to sign site close off or take over certificate once remedial corrective actions have been implemented. 	 Area superintendent Project Manager SHEW Contractor

8 REPORTING, MONONITORING AND AUDITING

The environmental monitoring, inspections and audits must be conducted in line with legislation, supporting procedures and requirements of this plan. Monitoring, inspection and audit reports detailing the monitoring, inspection and audit results shall be prepared by the SHEW section and communicated to the Area Manager, Superintendent or Project Manager.

9 NON-COMPLIANCE AND CONFLICT MANAGEMENT PROCEDURES

The Area Superintendent, Project manager and Contractor shall ensure that the employees and external service providers comply with the requirements outlined in this EMP. In the event of non-compliance the following recommended process shall be followed:

- Non compliances will be identified during inspections or audits and be reported to the Area manager, Superintendent and Project Manager for corrective actions.
- Area Superintendent / Project Manager shall notify the responsible stakeholders about the non-compliance .
- Corrective and preventative actions must be implemented on an agreed timeframes.
- Area Superintendent / Project Manager to report back on how the non-conformances have been rectified.
- Follow up inspections/audits shall be conducted to assess whether the corrective and preventative actions were implemented effectively.

The contractor/Area Superintendent / Project Manager shall communicate the following:

- Any special conditions requested by a landowner / representative.
- Conflicts arising with any landowner / representative and other stakeholders.
- Actions taken to resolve the conflicts with stakeholders

NamPower has the right to stop certain line activities if it is found that a gross violation of the EMP is taking place.

10 RECORD KEEPING

Record keeping is important for the effective functioning and implementation of an EMP. EMP documentation must be kept in both the hard copy and electronic format for safe keeping and must be available during SHE inspections and audits.

11 CONCLUSION

All management measures and legal requirements outlined in this EMP should be implemented in order to ensure environmental compliance by all parties undertaking the operational activities. This will ensure that potential negative impacts are identified, avoided or mitigated and positive impacts are enhanced.

1 ANNEXURES

Annexure 1: Sensitive and important areas

Table 2. Areas of importance, with protected species potentially affected, between Otjikoto and Ohorongoalong the 132Kv line.

[Direction: Otjikoto to Mpasi]

Hotspot areas	Area	Important species	Common names	Status	Other important features	Importance ranking
	Otjikoto area					Low
	Otjikoto area				Mahangu fields& houses	High
	Otjikoto area					Low
	Otjikoto area				Mahangu fields	High
	Otjikoto area	Burkea africana Schinziophyton rautanenii Sclerocarya birrea Peltophorum africanum Philonoptera nelsii	Burkea; Mangeti; Marula; African Wattle; Apple Leaf	F# F# F# F#	, , , , , , , , , , , , , , , , , , ,	Low
	Otjikoto area				Mahangu fields & houses	High
	Otjikoto area	Burkea africana Schinziophyton rautanenii Sclerocarya birrea Peltophorum africanum Pterocarpus angolensis Philonoptera nelsii	Burkea; Mangeti; Marula; African Wattle; African Teak; Apple Leaf	F# F# F# F# F#	nouses	Low
	Otjikoto area				Wetland area	High
	Otjikoto area	Burkea africana Schinziophyton rautanenii Sclerocarya birrea Peltophorum africanum Pterocarpus angolensis Philonoptera nelsii	Burkea; Mangeti; Marula; African Wattle; African Teak; Apple Leaf	F# F# F# F# F#		Low
		Acacia erioloba Burkea africana	Camelthorn; Burkea;	F# F#		
	Otjikoto area	Schinziophyton rautanenii Sclerocarya birrea Peltophorum africanum Pterocarpus angolensis Philonoptera nelsii	Mangeti; Marula; African Wattle; African Teak; Apple Leaf	F# F# F# F#	Mahangu fileds; Sikongo Green Scheme	High
	Otjikoto area	Acacia erioloba Burkea africana Schinziophyton rautanenii Sclerocarya birrea Peltophorum africanum Pterocarpus angolensis Philonoptera nelsii	Camelthorn; Burkea; Mangeti; Marula; African Wattle; African Teak; Apple Leaf	F# F# F# F# F# F#		Low
	Otjikoto area				Mahangu fileds	High
	Otjikoto area	Acacia erioloba Burkea africana Schinziophyton rautanenii Sclerocarya birrea Peltophorum africanum Pterocarpus angolensis Philonoptera nelsii	Camelthorn; Burkea; Mangeti; Marula; African Wattle; African Teak; Apple Leaf	F# F# F# F# F# F#	J	Low
	Otjikoto area				Omuramba	High
	Otjikoto area	Acacia erioloba Burkea africana Schinziophyton rautanenii Sclerocarya birrea	Camelthorn; Burkea; Mangeti; Marula;	F# F# F# F#		Low

			F "		
	Peltophorum africanum	African Wattle;	F#		
	Pterocarpus angolensis	African Teak;	F#		
	Philonoptera nelsii	Apple Leaf	F#		
	Accesic cricloba	Como altheorem	F#	Very open grass	Law
Otjikoto area	Acacia erioloba	Camelthorn;	F#	area	Low
	Burkea africana	Burkea;			
	Schinziophyton rautanenii	Mangeti;	F#		
	Sclerocarya birrea	Marula;	F#		
	Peltophorum africanum	African Wattle;	F#		
	Pterocarpus angolensis	African Teak;	F#		
	Philonoptera nelsii	Apple Leaf	F#		
Otjikoto area				Mahangu fields	High
	Acacia erioloba	Camelthorn;	F#		
	Burkea africana	Burkea;	F#		
	Schinziophyton rautanenii	Mangeti;	F#		
	Sclerocarya birrea	Marula;	F#		
Otjikoto area	Peltophorum africanum	African Wattle;	F#		Low
	Pterocarpus angolensis	African Teak;	F#		
	Philonoptera nelsii	Apple Leaf	F#		
Otiikoto aroa				Mahangu fiolde	High
Otjikoto area	Accesic criciche	Comolthorn	F#	Mahangu fields	
Otjikoto area	Acacia erioloba	Camelthorn;	F#		Low
	Burkea africana	Burkea;	F#		
	Schinziophyton rautanenii	Mangeti;	F#		
	Sclerocarya birrea	Marula;	F#		
	Peltophorum africanum Pterocarpus angolensis	African Wattle;	F#		
		African Teak;	F#		
	Philonoptera nelsii	Apple Leaf	ι#		
Otjikoto area				Omuramba	High
Otjikoto area	Acacia erioloba	Camelthorn;	F#		Low
-	Burkea africana	Burkea;	F#		
	Schinziophyton rautanenii	Mangeti;	F#		
	Sclerocarya birrea	Marula;	F#		
	Peltophorum africanum	African Wattle;	F#		
	Pterocarpus angolensis	African Teak;	F#		
	Philonoptera nelsii	Apple Leaf	F#		
Otjikoto area				Mahangu fileds	High
Ohorongoarea	Acacia erioloba	Camelthorn;	F#	mananga modo	Low
Onorongoarea	Burkea africana	Burkea;	F#		LOW
	Schinziophyton rautanenii	Mangeti;	F#		
	Sclerocarya birrea	Marula;	F#		
	Peltophorum africanum	African Wattle;	F#		
	Pterocarpus angolensis	African Teak;	F#		
	Philonoptera nelsii	Apple Leaf	F#		
0					1
Ohorongoarea	A		F#	Omuramba	High
	Acacia erioloba	Camelthorn;	F#	Elephant activity	
Ohorongoarea	Burkea africana	Burkea;	F#	and numerous A.	Low
	Schinziophyton rautanenii	Mangeti;	F#	<i>erioloba</i> fegrowth	
	Sclerocarya birrea	Marula;	F#		
	Peltophorum africanum	African Wattle;	F#		
	Pterocarpus angolensis	African Teak;	F#		
	Philonoptera nelsii	Apple Leaf	F#		
Ohorongoarea				Omuramba Very dense	High
Ohorongoarea	Acacia erioloba	Camelthorn;	F#	regrowth	Low
Shorongoarea	Burkea africana	Burkea:	. <i>"</i> F#	i ogi owiti	LOW
	Schinziophyton rautanenii	Mangeti;	F#		
	Sclerocarya birrea	Marula;	F#		
	Peltophorum africanum	African Wattle;	F#		
	Pterocarpus angolensis	African Teak;	F#		
	Philonoptera nelsii	Apple Leaf	F#		
		11 - 200			

Annexure 2: Herbicide application guideline for vegetation management under the line.

Management requirement

Recommended herbicide: Access 240 SL or any similar product with picloram or tricoplyr as active ingredients should be used

Recommended Application method: Foliar application – spray or paint-on-stump – is recommended as this is target specific. Access mixed with water and Actipron (wetting agent).

Technique: The herbicide can be applied directly to the plant – stem or leaves – as a spray. Trees and shrubs with a stem diameter <10cm can be sprayed directly, but trees with a stem diameter >10cm should be felled before treatment of the cut surface for best results. Treatment should be done as soon as possible after felling and the entire cut surface and stump should be wetted. Coppice growth can also effectively be controlled.

Use: Active growing season – i.e. September to April (best in early growing season – September to November – before main rains) has best results.

Concentration

Foliar application = 350ml/100l water + Actipron Super 500ml/100l spray mix.

Cut stump application = 2l/100l water + Actipron Super 2l/100l spray mix.

Application repeatability

- Year 1: Apply herbicide (early growing season)
- Year 2: Follow-up to target any regrowth and coppicing (early growing season)
- Thereafter: As required i.e. dependent on coppicing potential of various species. This could be determined during routine line inspections.

Annexure 3: Landowner permission form



Landowner Permission Form



Landowner name:	Contact number:
Representative name:	
Farm name:	-
Contractor:	_
Representative name:	Contact number:
General N	Notice
This form is to be used prior to a contractor ent	ering a landowner's property to commence

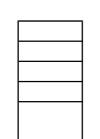
any work related to the construction or maintenance of power-line structures and servitudes.

The form must be completed by either the landowner or his / her legal representative on

Section A: Before activities commence

Activities to be undertaken on the property (completed by the contractor):

Use of water resources Powerline erection Powerline refurbishment Trimming of vegetation Use of other infrastructure (please specify)



Camping Bush clearing Herbicide application Access road usage Rehabilitation

Specific conditions to be met on the property (as stipulated by the landowner):

ates when access is needed: From:	: То:
ignatures (prior to entry)	
andowner/Representative	Contractor representative
Date	Date

Section B: Upon completion of work and prior to leaving the property

Remarks on compliance or misconduct (upon completion of activities):

Issues still to be resolved upon completion of activities:

Signatures (upon completion)

Landowner/Representative

Contractor representative

Date

Date

Annexure 4: Chance find procedure

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

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

Procedure:

Action by person identifying archaeological or heritage material

- a) If operating machinery or equipment stop work
- b) Identify the site with flag tape
- c) Determine GPS position if possible
- d) Report findings to foreman

Action by foreman

- a) Report findings, site location and actions taken to superintendent
- b) Cease any works in immediate vicinity

Action by superintendent

- a) Visit site and determine whether work can proceed without damage to findings
- b) Determine and mark exclusion boundary
- c) Site location and details to be added to project GIS for field confirmation by archaeologist

Action by archaeologist

- a) Inspect site and confirm addition to project GIS
- b) Advise NHC and request written permission to remove findings from work area
- c) Recovery, packaging and labelling of findings for transfer to National Museum
- In the event of discovering human remains
- a) Actions as above
- b) Field inspection by archaeologist to confirm that remains are human
- c) Advise and liaise with NHC and Police

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