



ENVIRONMENTAL MANAGEMENT PLAN (AMENDED) – July 2023

FOR

THE SWAKOPMUND-LANGER HEINRICH MINE WATER SUPPLY SCHEME

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LIST OF ABBREVIATIONS

AIDS	Acquired Immune Deficiency Syndrome
CoC	Code of Conduct
DEA	Directorate of Environmental Affairs
EMA	Environmental Management Act
EMP	Environmental Management Plan
HIV	Human Immunodeficiency Virus
I&AP	Interested and Affected Parties
kV	Kilovolt
kW	Kilowatt
LHU	Langer Heinrich Uranium Mine
m³/h	Cubic meter per hour
MET	Ministry of Environment and Tourism
MEFT	Ministry of Environment, Forestry and Tourism
Mm³/a	Million cubic meters per annum
MSDS	Material Safety Data Sheet
NEM	NamWater Environmental Manager
MSDS	Material Safety Data Sheet
NWQG	Namibian Water Quality Guidelines
NWQS	Namibian Water Quality Standards
STI's	Sexually Transmitted Infections
WTW	Water Treatment Works

1. PURPOSE OF THE EMP

This Environmental Management Plan (EMP) has been compiled and updated for the management of potential environmental impacts during the operation and decommissioning phases of the existing Swakopmund-Langer Heinrich Water Supply Scheme. Best practice is proposed for the generic issues of construction management and supervision as well as the on-going management and operation of the water supply scheme.

In terms of the Environmental Assessment Policy of 1994 and the Environmental Management (Act No 7 of 2007) (EMA), the activities required for the construction, operation and the decommissioning of the Swakopmund-Langer Heinrich Uranium Water Supply Scheme requires authorization from the Directorate of Environmental Affairs (DEA) at the Ministry of Environmental, Forestry and Tourism (MEFT).

An Environmental Clearance Certificate (ECC) was originally issued in 2017. The EMP was updated in November 2020 and accompanied the application for the renewal of the ECC.

Due to the prevailing low uranium price Langer Heinrich Uranium (Pty) Ltd (LHU) decided to place the Langer Heinrich Mine under Care and Maintenance in June 2018. Minimum water was required at the mine during this time.

A pre-feasibility study to restart the mine and Return to Production was completed in June 2020 followed by a valued add study in June 2021. In July 2022 the holding company announced the final investment decision to *Return to Production*, planned for the first quarter of 2024.

To ensure ongoing compliance and considering the plans for the restart of the mine, LHU had to 're-assess' the proposed changes to the activities and the associated key environmental impacts, including the increased water requirements of the mine by means of a Scoping (including an Impact Assessment) Report. Where relevant, the existing (approved) EMP for LHU and the existing (approved) EMP for the Swakopmund-Langer Heinrich Water Supply Scheme have been reviewed and the necessary changes / additional management and mitigation measures were included in the (amended) EMPs for LHU and the Swakopmund-Langer Heinrich Water Supply Scheme (this document).

2. INTRODUCTION

Langer Heinrich Mine is a large open pit mine located in the western part of Namibia in the Erongo Region, approximately 80 km east of Swakopmund. The Swakopmund-Langer Heinrich Mine Water Supply Scheme was designed to supply a maximum of 1.5 Mm³/a to the Langer Heinrich Uranium Mine.

For the Return to Production plans of LHU, an increase to 2.2 million m³ per annum (Mm³/a) in water supply is required by the mine. To supply this proposed water demand, the height of the pumpstation buildings along the water pipeline will have to be increased to accommodate the necessary larger pumps and associated infrastructure. The current water pipeline along the C28 Road to the LHU access road, the aboveground section, as well as the underground section from the LHU turnoff to the mine site will remain as is (i.e., the pipe diameter is big enough).

The location of the Swakopmund-Langer Heinrich Water Supply Scheme is depicted in **Figure 1**.

The EMP is for the existing scheme and it is therefore largely for the operation and maintenance of the scheme. However, the activities and related management and mitigation measures associated with the bigger booster pump stations are also included.

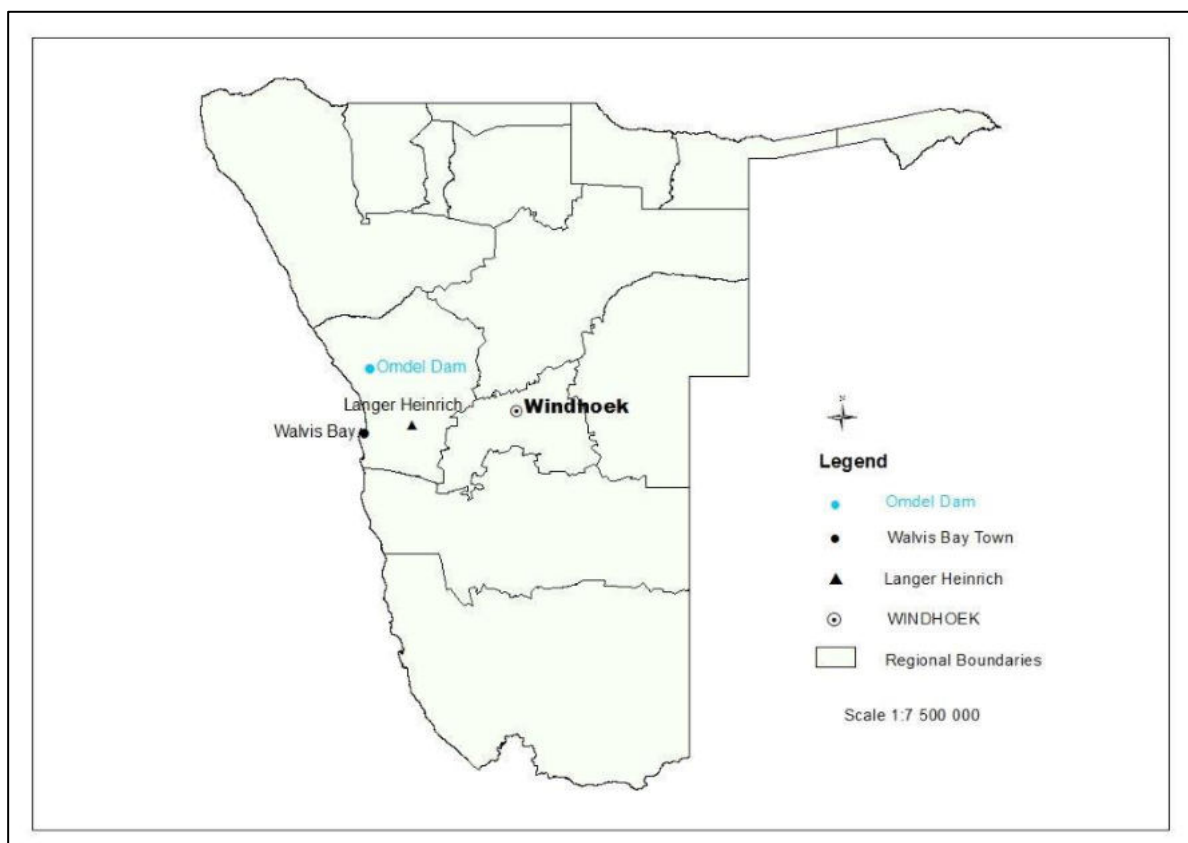


Figure 1: Swakopmund-Langer Heinrich Water Supply Scheme Location Map

3. EXISTING SWAKOPMUND-LANGER HEINRICH MINE WATER SUPPLY INFRASTRUCTURE

3.1 Water Source

The scheme consists of a base pumpstation at Swakopmund Base Reservoir, two booster stations, a pipeline and 3 terminal reservoirs at the mine. Three equal-sized pump stations transport the water to the mine. The total static head between Swakopmund Base and the reservoirs at the mine is 588.25 m. Six Grundfos CR45-12 pumps with 45 kW 3-phase motors are installed at each pump station.

The capacity of the scheme can vary from approximately 55 m³/h with one pump operation to 225 m³/h with five pump operation. A 45 m³ square steel reservoir is available at each of the booster stations for flow balancing.

A schematic layout of the existing infrastructure is indicated in **Figure 2** below.

3.2 Water Quality and Disinfection

The water is chlorinated at the terminal reservoirs in Henties Bay and Swakopmund Base Station before the water is distributed to LHU.

3.3 Pipe Work

The Langer Heinrich pipeline has a total length of 83.125 km with a design capacity of 206 m³/h, which consists of the following:

- A 28.95 km, aboveground 300NB DCI K9 pipeline connects Base Station and Booster 1. The static head of this section is 178 m.
- A 31.08 km, 300NB DCI K9 pipeline connects Booster 1 and Booster 2, the static head is 191.68 m. The last 6.78 km to Booster 2 is below ground.
- A 23.1 km, below ground 300NB DCI K9 pipeline connects Booster 1 and Booster 2; the static head is 221.33 m.

3.4 Reservoirs

3.4.1 Terminal Reservoirs at Langer Heinrich

The clear water storage facilities at the mine consist of three interconnected 2 500 m³ membrane-lined round steel reservoirs of the Botank type. The reservoir is secured and permanently closed. LHU also have two existing water storage bladders with joined capacity of 50 000 m³. LHU is planning to convert an existing brine pond to a new (3rd) water storage bladder next to the existing two bladders. The new bladder will have a capacity of 12 000 m³.

3.4.2 Swakopmund Reservoir

The Swakopmund Base Reservoir is a 20 000 m³ square concrete reservoir with a full supply level of 61.9 m above sea level. The reservoir can be supplied with water from the Kuiseb and Omdel aquifers as well as the Erongo Desalination Plant.

3.5 Power Supply and Control System

The scheme can be operated automatically with actuated valves, pressures and levels of the balancing reservoirs of each pump station and the terminal reservoirs. The telemetry system is functional and the full control of the system can be done via telemetry. Erongo Red supplies 11 kV to base and Booster 1, while NamPower supplies 11 kV to Booster 2.

3.6 Scheme Processes / Operation

There is a fulltime NamWater scheme operator based in Swakopmund, who does checks on a daily basis whether all the systems are functional. The scheme has been electrified and automated with timer switches.

3.7 Proposed Amendments

For the proposed water increase, the height of the pumpstation buildings along the water pipeline will be increased to accommodate the larger pumps and associated infrastructure. The water pipeline will stay intact as its diameter is big enough.

Access to the pumpstations will be from the C28 road and it is expected that the construction activities will be confined to the already disturbed reserve between the C28 road and the pipeline. No additional footprint increase will be made.

Only limited additional disturbance to biodiversity is possible, while no disturbance to archaeological / heritage sites is expected. Due to the increased height of the pumpstation buildings, the potential cumulative visual impacts along the C28 road can increase.

3.8 Maintenance

Maintenance is done by a permanent NamWater team.

3.7.1 Pumps

All motor bearings should be lubricated with a high-temperature lithium-based grease after 3000 hours.

If a pump/s were out of operation for six months, lubrication is required before service commence on all motor bearings.

3.7.2 Air Valves

The valves must be opened monthly to be descaled and cleaned to ensure effective operation. The service intervals will depend on the severity of the conditions.

3.7.3 Pressure Gauges and Transducers

The gauge cocks must be turned monthly to bleed-off air and ensure accurate readings. Turning prevents scale accumulation which prevents the gauge cock from functioning. The operational or service intervals will depend on the severity of the conditions.

3.7.4 Reservoirs

The reservoirs should be checked for leaks and other damages on a monthly basis. If leaks are detected, it should be fixed immediately.

3.7.5 Pipe Breaks / Leaks

Monthly monitor of pipes should be done to avoid wastage of water in an event a major pipe break. The pipeline corridor for maintenance work is 10 m by 5 m.

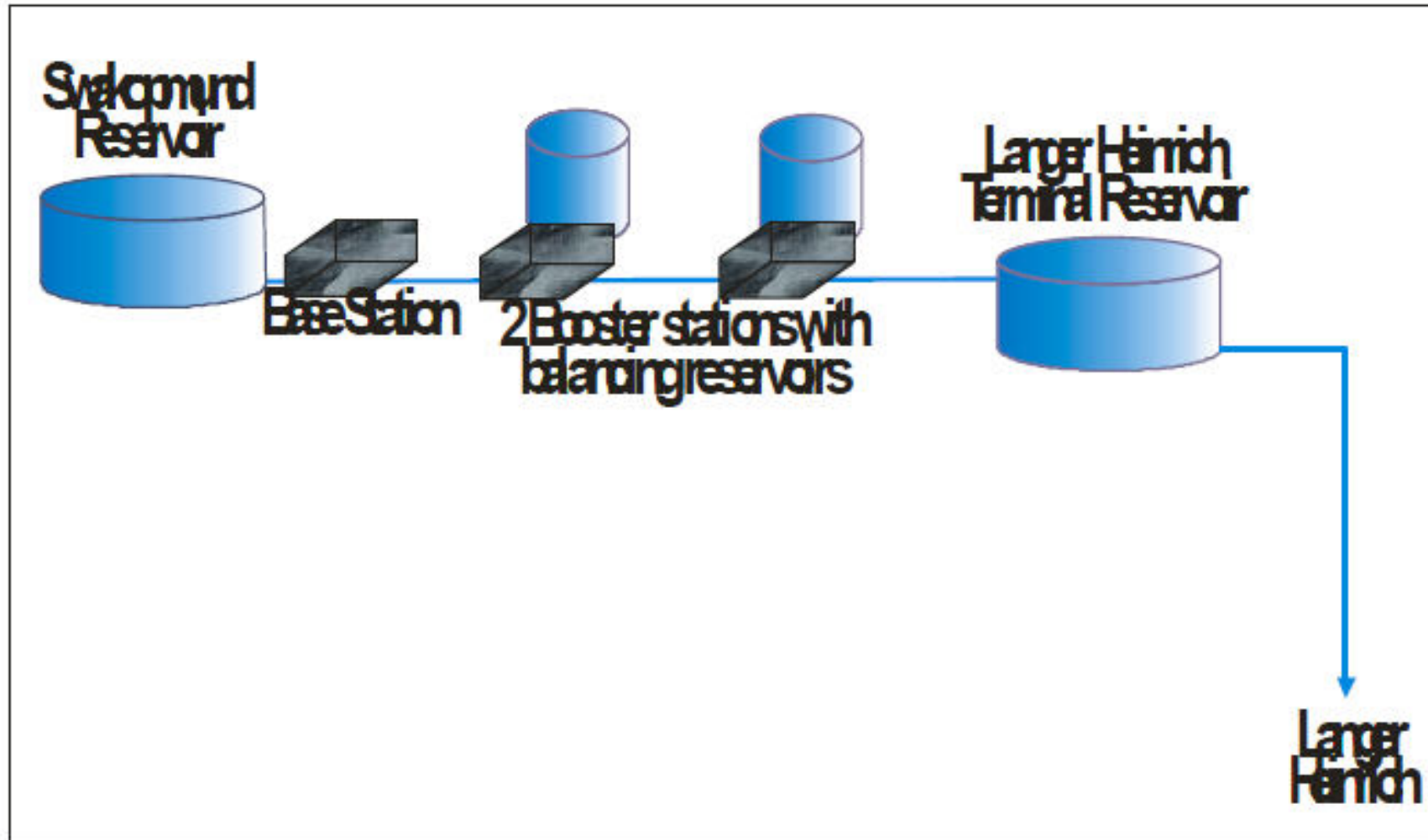


Figure 2: Swakopmund-Langer Heinrich Scheme Layout

4. BRIEF DESCRIPTION OF THE RECEIVING ENVIRONMENT

The baseline description provided below focuses on the receiving environment:

4.1 Climate

The area has a mild desert climate (Mendelsohn, *et al.*, 2009).

4.1.1 Precipitation

Rainfall at LHU and the Namib Desert in general is erratic and low. In contrast evaporation exceeds 2,000mm per annum. Generally, rainfall increases from the west (10 mm at the coast) to the east (about 60 mm at a distance of 100 km inland). The driest month is May, whilst the most rainfall drops in March (Mendelsohn, *et al.*, 2002).

4.1.2 Temperature

The average maximum temperature is found to be between 30 °C to 34 °C, whilst the average minimum temperature during the coldest month of July is between 8 °C to 10 °C respectively (Mendelsohn, *et al.*, 2002).

4.2 Geology

Uranium mineralisation at LHU is associated with the calcretisation of valley-fill fluvial sediments in an extensive tertiary palaeodrainage system. Calcrete is a chemically precipitated limestone that forms under arid to semi-arid climatic conditions. Uranium mineralisation occurs as carnotite, an oxidised uranium and vanadium secondary mineral. The deposit extends over a 15 km length in 7 higher grade pods within a lower grade mineralised envelope. The carnotite occurs as thin films lining cavities and fracture planes and as grain coatings and disseminations in the calcretised sediments. Mineralisation is near surface, 1 m to 30 m thick and is 50 m to 1,100 m wide depending on the width of the palaeovalley (Christelis *et al.*, 2011).

4.3 Natural Fauna and Flora

Many animal species have been observed in the greater area such as: ostrich (*Struthio camelus*), lappet faced vulture (*Torgos tracheliotos*), Ludwig's bustard (*Neotis ludwigii*), Ruppel's korhaan (*Eupodotis rueppellii*), Ruppel's parrot (*Poicephalus rueppellii*), Namaqua sandgrouse (*Pterocles namaqua*), sengis (*elephant shrews*), Namib golden mole (*Eremitalpa granti namibensis*), kudu (*Tragelaphus strepsiceros*), warthog (*Phacochoerus aethiopicus*), caracal (*Felis caracal*), shrews (*Soricidae*), the chacma baboon (*Papio ursinus*) and rock hyrax (*Procavia capensis*), Springbuck (*Antidorcas marsupialis*) and Hartmann's Mountain Zebra (*Equus zebra hartmannae*) (Mendelsohn, *et al.*, 2009).

Most plants and animals in the Central Namib rely on fog for water. The flora remains moderately sparse. The vegetation in the area includes flora such as: desert sedge (*Carex resectans*), smooth lovegrass (*Eragrostis curvula*), dollar bush (*Zygophyllum stapffii*), brakspekboos (*Zygophyllum simplex*), welwitschia (*Welwitschia mirabilis*), dune grass (*Elymus mollis*), feather-top (*Pennisetum villosum*) and ostrich grass (*Struthio camelus*) (Mendelsohn, *et al.*, 2009).

5. THE LEGAL ENVIRONMENT

A legal review was done, and the key laws of concern include those which protect the ecological integrity of the Swakopmund-Langer Heinrich Mine ecosystem and its water resource, including the Water Act of 1954 and the Water Resources Management Act of 2004, and applicable international treaties such as the Convention on Biological Diversity. These laws and conventions place Namibia under an obligation to conserve the ecological integrity of the Swakopmund-Langer Heinrich Mine ecosystem for the sustainable use by Namibians.

5.1 The Constitution of the Republic of Namibia

There are two clauses contained in the Namibian Constitution that are of particular relevance to sound environmental management practice, viz. articles 91(c) and 95(l). In giving effect to articles 91(c) and 95(l) of the Constitution of Namibia, general principles for sound management of the environment and natural resources in an integrated manner have been formulated. The formulation of these general principles resulted in the Namibia's Environmental Assessment Policy of 1994. To give statutory effect to this Policy, the Environmental Management Act was approved in 2007, and gazetted as the Environmental Management Act (Act No. 7 of 2007) (herein referred to as the EMA. As the organ of state responsible for management and protection of its natural resources, the DEA at the MEFT is committed to pursuing the 13 principles of environmental management that is set out by Part 2 of the Act.

To summarize, Articles 91(c) and 95(l) refer to:

- Guarding against over –utilization of biological natural resources;
- Limiting over-exploitation of non-renewable resources;
- Ensuring ecosystem functionality
- Protecting Namibia's sense of place and character;
- Maintaining biological diversity and
- Pursuing sustainable natural resource use.

5.2 Environmental Assessment Policy (1995)

Cabinet endorsed Namibia's Environmental Assessment Policy in 1995 as the first formal effort in Namibia to regulate the application of environmental impact assessments and environmental management. Amongst others, the Policy provides a procedure for conducting EIA's which sets out to:

- Better inform decision makers and to promote accountability of decisions taken;
- Strive for a high degree of public participation and involvement of all sectors of the Namibian community during the execution of the EIA;
- Take into account the environmental costs and benefits of projects and Programmes;
- Promote sustainable development in Namibia;
- Ensure that anticipated adverse impacts are minimized and that positive impacts are maximized.

5.3 Environmental Management Act (No 7 of 2007) (EMA)

The Environmental Management Act (EMA) was promulgated in 2007 by Parliament and gives effect to the Environmental Assessment Policy. The Act specifies the environmental assessment procedures to be followed as well as the listed activities (activities that require an EIA).

Of relevance to this project are the following listed activities, as provided in Section 27 of this Act, which include:

- Water use and disposal;
- Transportation

5.4 EIA Regulations Government Notice No. 30, promulgated on 6 February 2012

The regulations, promulgated in terms of the EMA, were promulgated on 6 February 2012 and indicated certain activities that require an Environmental Clearance from the DEA prior to commencing.

5.5 Water Act 54 of 1956 and Water Resources Management Act 11 of 2013

The Water Resources Management Act 11 of 2013 is presently without regulations; therefore the Water Act 54 is still in force. The Act provides for the management and protection of surface and groundwater resources in terms of utilisation and pollution.

6. RESPONSIBLE PARTIES

NamWater's Environmental Manager is primarily responsible for the implementation of the EMP during the operational and maintenance phases.

6.1 NamWater

NamWater, as the implementing agency, is responsible for:

- Ensuring that the management actions are being adhered to.
- Ensuring that all environmental impacts are managed according to the environmental principles of avoiding, minimizing, mitigating and rehabilitation. This will be achieved by successful implementation of the EMP.
- Ensuring that appropriate monitoring and compliance auditing are executed.
- Ensuring that the environment is rehabilitated to its natural state as far as possible.

NamWater shall ensure that all employees attend an Environmental, Awareness Training Course. This course shall be structured to ensure that attendees:

- Become familiar with the environmental controls contained in the EMP.
- Are made aware of the need to conserve water and minimise waste.
- Are made aware of NamWater's Code of Conduct.
- Are aware that a copy of the EMP is readily available at the plant and that all staff are aware of the location and have access to the document.
- Are informed that employee information posters, outlining the environmental "do's" and "don'ts" (as per the environmental awareness training course) will be placed at prominent locations throughout the site.

7. ENVIRONMENTAL MANAGEMENT PLAN

An EMP is an important tool focusing on the management actions that are required to ensure environmental compliance of a particular project.

EMP implementation is a cyclical process that converts mitigation measures into actions and through cyclical monitoring, auditing, review and corrective action, ensures conformance with stated EMP aims and objectives. Monitoring and auditing, feedback for continual improvement ensures that environmental performance has been provided and corrective action is taken for an effective EMP.

The main aim of this EMP is to ensure that the project complies with the goals of the Namibian Environmental Management Act (No. 7 of 2007); and, more specifically, to provide a framework for implementing the management actions as described in the EMP for the operational and maintenance phases of the scheme. Best practice is proposed for the operation of the scheme.

There are some environmental impacts that cannot be avoided. These environmental impacts require mitigation, and in order to mitigate against these impacts an EMP is required. The EMP aims to ensure best practises are implemented and environmental degradation is avoided through appropriate environmental protection, adherence to legal requirements and maintaining good community relationships.

The DEA at the MEFT indicated that EMP's for existing operations are sufficient.

The project activities are grouped according to the different operational processes and stages. Most of the impacts can be reduced through good housekeeping.

8. MANAGEMENT ACTIONS

8.1 Operation and Maintenance phase of the Swakopmund-Langer Heinrich Mine Water Supply Scheme

8.1.1 Introduction

The Operational Phase Section relates to the management and mitigation measures required to ensure that the continuation of the bulk water supply network and the maintenance of the infrastructure is operated in a manner that demonstrates responsible, precautionary environmental management. The activities associated with the increased pump stations also relate to these sections.

The EMP will address specific areas of concern in terms of the long-term environmental management of the affected environment and is intended to serve as a guide to the ongoing management of the water supply scheme site as well as the affected environment. The EMP will therefore aim to provide NamWater with the necessary tools to ensure that the potential impacts on the natural environment of the site during the operation of the water supply scheme are minimised. Moreover, it will aim to ensure that the infrastructure is operated and maintained according to Best Practice, in an environmentally sensitive and sustainable manner, and that the operation of the infrastructure does not result in reasonably avoidable environmental impacts.

Table 1: Operation and Maintenance Phase Management Table

Issue	Objective	Strategy	Actions	Time frame
Maintenance and emergency procedures	To ensure correct procedures are in place to avoid environmental impacts associated with maintenance activities as well as proactive intervention to avoid, and if required, to respond to emergencies	<ul style="list-style-type: none"> ● Establish environmentally sensitive and technically sound maintenance procedures as well as reporting structures. ● Compile a staff competency assessment and training programme. ● Establish emergency procedures to ensure appropriate response and minimise potential risk to the biophysical and social environment. 	<ol style="list-style-type: none"> 1. Establish regular reporting procedures on maintenance. 2. Undertake regular inspection and maintenance of all infrastructure to ensure in working order and to assess damaged / deficient equipment, as per the O&M Manual. 3. Review, and if necessary, revise the maintenance manual. 4. Establish emergency procedures guidelines for the blockage / failure, flooding, contaminant removal and disinfection, power failure and fire of the scheme. 5. Implement the response procedures when emergency incident occurs. 6. Complete the incident report checklist in the case of emergency and keep with monitoring records for submission. 7. Undertake an annual education course for all operational staff. 8. Review, and if necessary, revise the emergency manual. 	<p>Bi-monthly for the lifespan of infrastructure as per the maintenance manual.</p> <p>Bi-annually for lifespan of works.</p> <p>When emergency incident occurs.</p> <p>Emergency incident</p> <p>Annually for lifespan of operation.</p> <p>Annually for lifespan of operation</p> <p>Annually for lifespan of operation</p>

8.2 Maintenance Procedures

The optimal operation and effective maintenance of all the scheme components is important in protecting the environment and ensuring that resources are not wasted and environmental incidents arising out of equipment or infrastructure failures, are avoided. Operation and Maintenance Manuals are available for the Swakopmund-Langer Heinrich Mine Water Treatment Works (WTW). The manuals provide a detailed guidance on the operation of all machinery and associated systems as well as related maintenance procedures, including maintenance schedules. Implementation of this manuals by NamWater will facilitate the proactive management of potential risks and thus result in impacts on the receiving environment being averted.

The maintenance procedures set out in the manuals, provides specific guidance in terms of the monitoring and maintenance of the scheme components. These procedures will specify the equipment item and specific component of each piece of equipment requiring checking, the scope and nature of the check that is to be carried out including detailed instructions related to the specific check, and the programme for conducting each check.

8.3 Facility Management and Operations

NamWater shall ensure that sufficient budget allocations and provisions are made available to ensure that the infrastructure can be adequately operated and maintained. NamWater must also attend to damage to the scheme components resulting in water loss as a matter of high priority.

8.4 Routine Maintenance and Repairs

The condition of the infrastructure shall be inspected routinely, and a maintenance list compiled. Identified, preventative maintenance issues shall be undertaken as soon as possible. Any wastes arising from the repair and maintenance work must be removed and disposed-off at a designated waste deposal site as part of the operation.

8.5 Environmental Awareness

Instilling a sense of environmental awareness and consideration in all employees, but especially those involved with the scheme operations is vital to the overall success of any environmental management plan. It is therefore recommended that a general environmental awareness course for the Scheme Staff Members, who may be required to carry out duties on the scheme, be undertaken.

8.6 Waste and Pollution Management

8.6.1 Waste and Pollution Prevention

To prevent the improper disposal of waste and to prevent pollution, the following management actions shall be enforced:

- All waste will be removed to an appropriate waste dump.
- No waste should be buried.
- General Waste: Includes wastepaper, plastic, cardboard, harmless organic (e.g. vegetables) and domestic waste.
- No littering will be allowed. The plant area will be kept free of waste at all times.

- Provide sufficient waste bins at worksites. Make sure that all waste is removed from the worksites.
- Hazardous Substances include sewerage, fuels, lubrication oils, hydraulic and brake fluid, solvents, paints, anti-corrosives, insecticides and pesticides, chemicals, acids etc. It should be disposed of at designated hazardous disposal sites.
- Contaminated soil should be stored in drums and taken to the nearest appropriate waste dumpsite.
- Do not change oil on uncovered ground. Drip trays will be used to catch oil when vehicles are repaired in the field.
- Used oil and hydraulic fluids will not be discarded on the soil or buried. It will be removed from site and taken back to an appropriate dump.
- In the event of a hazardous spill:
 - ✓ Immediately implement actions to stop or reduce the spill.
 - ✓ Contain the spill.
 - ✓ Arrange implementation of the necessary clean-up procedures.
 - ✓ Collect contaminated soil, water and other materials and dispose it at an appropriate waste dumpsite.
- Used solvents and grease should be stored in drums or other suitable containers. It should be sealed and recycled or disposed at an appropriate disposal site.
- Hazardous waste should not be burnt.
- Bunding, concrete slabs and or other protective measures should be installed where hazardous materials are handled.
- Ensure that the staff are informed and have information pertaining to the management of spills or ingestion.

8.6.2 Hazardous Materials

Where hazardous materials are required for repair and maintenance work (including fuels and oils), care will be taken to ensure that a competent individual is appointed to enforce the responsible use of such materials. The operational staff or maintenance teams shall carry a copy of the relevant Material Safety Data Sheet (MSDS) whenever using such materials. The Scheme Supervisor shall ensure that persons working with hazardous materials have been trained in the handling of such substances, as well as in emergency procedures to be followed in the event of an accidental spillage or medical emergency. Maintenance teams shall also carry a spill kit containing the appropriate neutralizing chemicals, absorbent materials and other relevant equipment required to undertake a clean-up of any spill that may occur.

8.6.3 Noise Management

During maintenance operations, all silencing mechanisms on all equipment must be in a good state of repair. Except for in emergency situations, no amplified sound may be broadcast. All routine maintenance shall be restricted to daylight hours.

8.7 Health and Safety

To minimise the risk of Human Immunodeficiency Virus (HIV) infection and the increase of Sexually Transmitted Infections (STI's) and the occurrence injuries the following management actions shall be enforced:

- Provide an Acquired Immune Deficiency Syndrome (AIDS) awareness programme to all the staff.
- Make sure that all staff are equipped and know how to use safety and protective gear. This includes hard hats, goggles, hearing protectors, dusk masks, steel-toed shoes etc.
- Keep a comprehensive first aid kit at the Scheme.
- Establish an emergency rescue system for evacuation of serious injured people.
- Emergency procedures for accidents should be communicated to all employees.
- Dangerous areas must be clearly marked and access to these areas controlled or restricted.
- Good driving and adherence to safety rules will result in a minimum number of road and workplace accidents.
- Fire extinguishers must be available at all refuelling sites. Staff should be trained to handle such equipment.
- Nobody is allowed to dispose a burning or smouldering object in an area where it may cause the ignition of a fire.
- Hazardous substances must be kept in adequately protected areas to avoid soil, air or water pollution.
- Work areas, such as these for the maintenance of equipment, must be on concrete slabs.
- Explosives should be stored according to the prescribed regulations.

9. SITE CLOSURE AND REHABILITATION

Rehabilitation is the process of returning the land in a given area that has been disturbed by construction and earthworks to some degree of its former state, or an otherwise determined state. Many projects, if not all, will result in the land becoming degraded to some extent. However, with proper rehabilitation most impacts associated with the reservoir construction project, could be mitigated and restored to an acceptable level. Poorly rehabilitated construction areas provide a difficult legacy issue for governments, communities and companies, and ultimately tarnish the reputation of operators as a whole.

Objectives of proper site closure and rehabilitation include the following:

- Reduction or elimination of the need for a long-term management program to control and minimise the long-term environmental impacts;
- Clean-up, treatment or restoration of contaminated areas (e.g. soils contaminated by oil or fuel spills, concrete spills, etc.). Excavation of contaminated material and disposal thereof in an acceptable manner.

Rehabilitation measures to implement:

- a. A site inspection will be held quarterly by the scheme supervisor after every maintenance work during operation of the scheme. Rehabilitation will be done to the satisfaction of the NamWater's Environmental Section and MEFT.
- b. Frequent inspections of the scheme and effective follow-up procedures, to prevent minor defects from becoming major repair jobs.
- c. Make sure all soil polluted during maintenance work is properly stored in drums and removed to an appropriate waste dump.
- d. Make sure all windblown litter is removed once maintenance has seized.
- e. Make sure that all potential hazards (i.e. the sewerage pit) are properly closed and left in a safe and neat position.

Rehabilitation will be completed when the above have be achieved.

10. NAMWATER ENVIRONMENTAL CODE OF CONDUCT

What is an Environmental Code of Conduct?

It is a set of rules that everybody has to follow in order to minimise damage to the environment.

What is the ENVIRONMENT?

The ENVIRONMENT means the surroundings within which people live. The ENVIRONMENT is made up of the **soil, water, plants, and animals** and those characteristics of the soil, water, air, and plant and animal life that influence **human health and well-being**. **People and all human activities** are also part of the environment and have to be considered during the operation of the Scheme.

Do these ENVIRONMENTAL RULES apply to me?

YES, The Environmental Rules apply to EVERYBODY. This includes all permanent, contract, or temporary workers as well as any other person who visits the Scheme. Every person will be required to adhere to the Environmental Code of Conduct.

ALL PERSONNEL must study and keep to the Environmental Code of Conduct

The SCHEME SUPERVISOR will issue warnings and will discipline ANY PERSON who breaks any of the Environmental Rules. Repeated and continued breaking of the Rules will result in a disciplinary enquiry and which may result in that person being asked to leave the Scheme permanently.

What if I do not understand the ENVIRONMENTAL RULES?

ASK FOR ADVICE, if any member of the WORKFORCE does not understand, or does not know how to keep any of the Environmental Rules, that person must seek advice from the SCHEME SUPERVISOR. The PERSON that does not understand must keep asking until he / she is able to keep to all the Environmental Rules.

Safety and Security

1. Only enter and exit roadways and construction areas at demarcated entrances.
2. Wear protective clothing and equipment as per signboards at the Scheme and according to instructions from your SCHEME SUPERVISOR.
3. Report to your SCHEME SUPERVISOR if you see a stranger or unauthorised person in the construction area.
4. Never enter any area that is out of bounds or that is demarcated as dangerous without permission of your SCHEME SUPERVISOR.
5. Never climb over any fence or enter private property without permission of the landowner or your SCHEME SUPERVISOR.
6. Do not remove any vehicle, machinery, equipment, or any other object from the construction site without the permission of your SCHEME SUPERVISOR.
7. Keep clear of blasting sites. Follow the instructions of your SCHEME SUPERVISOR.
8. Never enter or work in the Scheme while under the influence of alcohol or other intoxicating substances.
9. All staff should know the emergency procedures in case of accidents.

Waste Disposal

10. Learn the difference between different types of waste, namely:
 - general waste, and
 - hazardous waste.

Containers will be provided for different types of wastes.

General Waste includes wastepaper, plastic, cardboard, harmless organic (e.g. Vegetables) and domestic waste

Hazardous Waste includes objects, liquids or gases that are potentially dangerous or harmful to any person or the environment. Sewage, fuel, tyres, diesel, oils, hydraulic and brake fluid, paints, solvents, acids, soaps and detergents, resins, old batteries, etc. are all potentially hazardous.

11. Learn how to identify the containers for the different types of wastes. Only throw general waste into containers, bins or drums provided for general waste.
12. Recycle drums, pallets and other containers.
13. Never bury or burn any waste on site, all waste is to be disposed in allocated refuse disposal containers, bins or bags.
14. Never overfill any waste container. Inform your SCHEME SUPERVISOR if you notice a container that is nearly full.
15. Do not litter.
16. Do not bury litter or rubbish in the backfill trench.

Plants and Animals

21. **Do not ever pick any plants, or catch any animal.** People caught with plants or animals in their possession will be handed to the authorities for prosecution.
22. Never feed, tease, play with, or set devices to trap any animal or livestock. Wild animals are not to be domesticated.
23. Keep off the rock outcrops unless given specific permission by the SCHEME SUPERVISOR to be there.
24. Stay out of any area which is indicated as biodiversity sensitive. Areas where lichens and *Welwitschia mirabilis* plants are present must be avoided. If entry into such an area is absolutely necessary, the SCHEME SUPERVISOR and or Environmental Section of NamWater must be consulted first.
25. Observation of animals present, as well as their movement near and across the pipeline, must be reported for monitoring and reporting purposes.
26. Never cut down any tree or branches for firewood.
27. Never leave rubbish or food scraps or bones where it will attract animals, birds, or insects.
28. Rubbish must be thrown into allocated waste disposal bins/bags.
29. Always close the gates behind you.

Preventing Pollution

28. Only work with hazardous materials in banded areas.

29. Never discard any hazardous substances such as fuel, oil, paint, solvent, etc. into stream channels or onto the ground. Never allow any hazardous substances to soak into the soil.
30. Clean up spills immediately.
31. Immediately report to your SCHEME SUPERVISOR when you spill, or notice any hazardous substance overflow, leak or drip or spill on site, into the streambeds or along the road.
32. Immediately report to your SCHEME SUPERVISOR when you notice any container, which holds hazardous substances overflow, leak or drip. Spillage must be prevented.
33. Only wash vehicles, equipment and machinery, containers and other surfaces at work site areas designated by your SCHEME SUPERVISOR.
34. Do not change oil on uncovered surfaces.
35. If you are not sure how to transport, store, use, or get rid of any hazardous substances ask your SCHEME SUPERVISOR for advice.

Health

36. Drink lots of clean water every day.
37. Use toilets that have been provided.
38. Take the necessary precautions to avoid contracting HIV / AIDS. Condoms are available at most Clinics.
39. Inform your SCHEME SUPERVISOR when you are sick.
40. Do not work with any machinery when you are sick.
41. If you are working in malaria areas, you must take the necessary precautions.

Dust Control

42. Do not make any new roads or clear any vegetation unless instructed to do so by your SCHEME SUPERVISOR.
43. Keep to established tracks and pathways.
44. Keep within demarcated work areas.

Saving Water

47. Always use as little water as possible. Reduce, re-use and recycle water.
48. Never leave taps or hose pipes running. Close all taps after use.
49. Report any dripping or leaking taps and pipes to your SCHEME SUPERVISOR.

Working Hours

50. You may only work on weekends and after hours with the consent of the SCHEME SUPERVISOR.

Archaeological and Cultural Objects

52. If you find any archaeological, cultural, historical or pre-historical object on the construction site you must immediately notify your SCHEME SUPERVISOR.
53. Never remove, destroy, or disturb any cultural, historical, or pre- historical object on site.
54. A standard Chance Find Procedure must be followed in the case of an incidental discovery of an archaeological / heritage site.

Visual impacts

55. Land disturbance should be limited to what is absolutely necessary and must be rehabilitated afterwards.
56. Discarded items must be removed and littering must be prevented.
57. Where practical / possible, buildings and large equipment should be painted with colours that reflect natural colours of the surrounding landscape.
58. Avoid the use of pure whites and blacks.
59. To reduce potential glare, the use of bare or shiny metal on plant and buildings should be avoided.
60. Only use night lights where and if necessary. Design to illuminate only that which requires illumination.

Cultural and Historical Objects include old buildings, graves or burial sites, milestones, old coins, beads, pottery and military objects.

Pre-Historical objects include fossils and old bones, old human skeletal remains, pieces of pottery and old tools and implements.

Sensible Driving

61. Tracks and roads should be kept to a minimum. Where possible follow existing roads.
62. No off-road driving is allowed.
63. Never drive any vehicle without a valid licence for that vehicle class and do not drive any vehicle that is not road worthy.
64. Never drive any vehicle when under the influence of alcohol.
65. **Always** keep your headlights on when driving on dusty roads.
66. Keep to the roads as specified by your SCHEME SUPERVISOR. Vehicles may only be driven on demarcated construction roads. Drivers should always use three points turns, "u-turns" are not allowed. Do not cut corners.
67. Do not drive on rocky outcrops.

Noise

68. Keep noise levels as low as possible.
69. Do not operate noisy equipment outside normal working hours.

Fire Control

70. Do not make open fires, use a drum or tin and do not collect any vegetation to burn.
71. Do not smoke or make fires near refuelling depots or any other area where fuel, oil, solvents, or paints are used or stored. Fireplaces should be at a safe distance from fuel and explosive storage sites as well as vehicle parking sites.
72. Cigarette butts should always be thrown in allocated refuse bins. Make sure that the cigarette butt is out before throwing it into the bin.
73. Immediately notify your SCHEME SUPERVISOR if you see an unsupervised fire at the campsite or construction site.

Dealing with Environmental Complaints

74. If you have any complaint about dangerous working conditions or potential pollution to the environment, talk to your SCHEME SUPERVISOR.
75. If any person complains to you about noise, lights, littering, pollution, or any harmful or dangerous condition, immediately report this to your SCHEME SUPERVISOR.

Jolanda Kamburona

Tell: 061-71 2105

Cell: 081 144 1528

OR

Fillemon Aupokolo

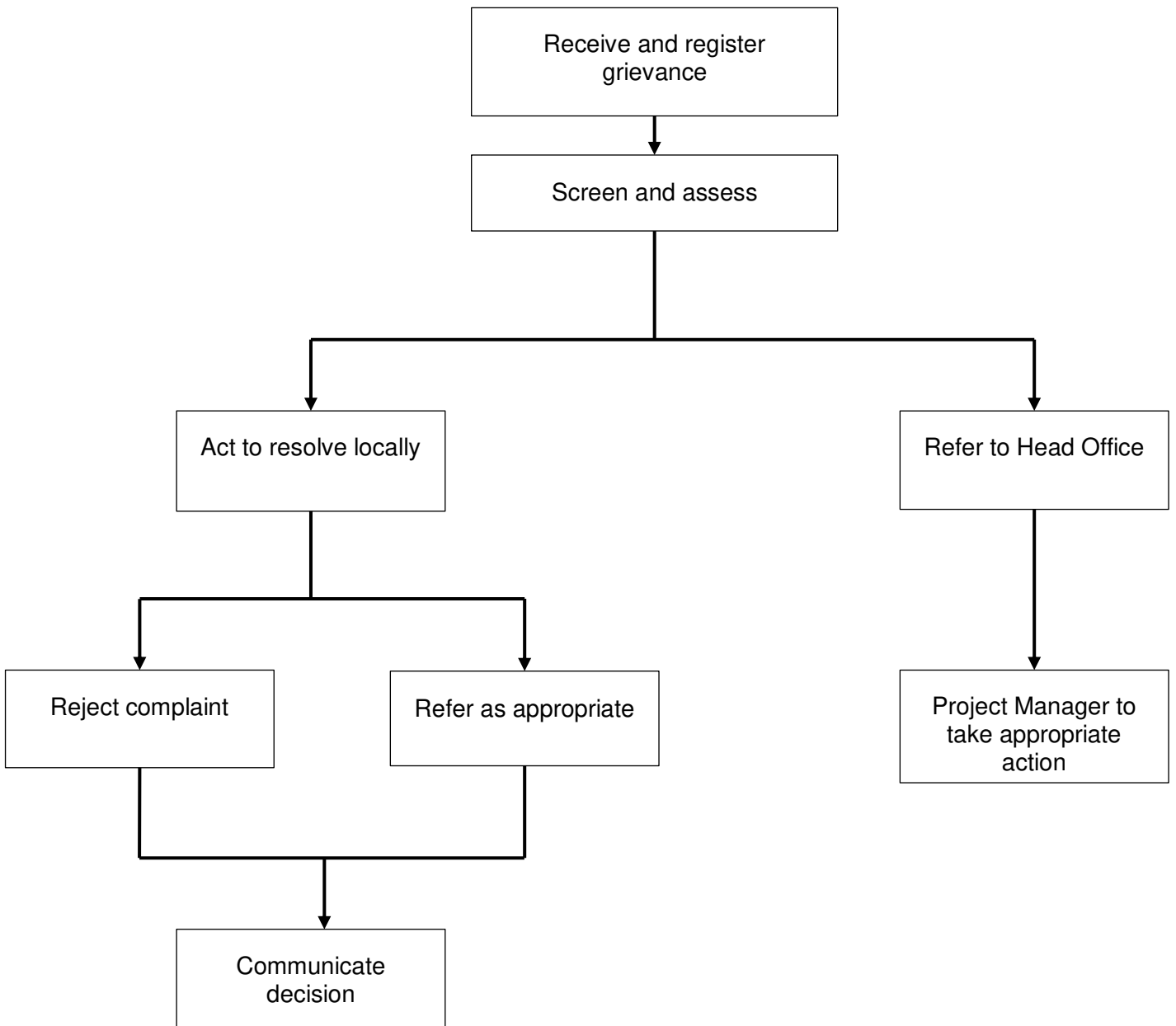
Tell: 061-71 2095

Cell: 081 325 3301

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ANNEXURE 1: GRIEVANCE PROCEDURE AND REGISTRATION FORM



Grievance Registration

Grievance Registration	
Case No:	Date:
Name of complainant:	Cell no:
	Email address:
Details of grievance: (Date, location, persons involved, frequency of occurrence, effects of ensuing situation, etc)	
Name of person recording grievance:	Cell number:
Proposed date of response:	
Signature of recording person:	Signature of complainant:
Date of redress:	
Decision and action:	