

**PROJECT STATUS**

<b>Title</b>	Environmental Scoping Report for the: <ul style="list-style-type: none"> <li>Subdivision of RE/740 &amp; Erf 510, Permanent Closure and Rezoning of Erf A/740 &amp; B/510, and Consolidation of Erven A/740, B/510, RE/741, 2002 and 2003, Keetmanshoop, //Karas Region.</li> </ul>		
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**ABBREVIATIONS**

AIDS	Acquired Immuno-Deficiency Syndrome
EA	Environmental Assessment
ECC	Environmental Clearance Certificate
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
EMA	Environmental Management Act
EMP	Environmental Management Plan
GG	Government Gazette
GIS	Geographic Information System
GN	Government Notice
GPS	Global Positioning System
HIV	Human Immuno-deficiency Virus
I&APs	Interested and Affected Parties
NHCN	National Heritage Council of Namibia
PR	Proponent's Representative
Reg.	Regulation
S	Section
SPC	Stubenrauch Planning Consultants
TB	Tuberculosis

## 1 INTRODUCTION

The Keetmanshoop Private School is currently operating on Erven RE/741, 2002 and 2003 in Keetmanshoop. The erven are situated next to one another along Twelfth Street (Erf RE/740). Proposed Erf A/740, Keetmanshoop is currently leased by the Private School and used as parking and as a drop off area for the learners before and after school. This portion is additionally used by the learners, teachers, and staff members of the Private School to access the school hostel, offices and classrooms which are situated on Erven RE/741, 2002, and 2003, respectively.

The school has built a pedestrian crossing to ease the movement on the street, but the general public has access to the street and use it to access other parts of the neighbourhood. This constitutes a safety hazard as many drivers have been noticed to drive recklessly which endangers the lives of the learners. In addition, the public use of the street has made it difficult for the school to monitor movements around the school premises and so ensure the safety of its learners and property.

For this reason, that the Keetmanshoop Private School (the proponent) has proposed that the streets (Erf A/740 and Erf B/510) be closed to the public and purchased by the proponent to form part of Keetmanshoop Private School property thus restricting use of the street for the school only. The following statutory steps are to be undertaken in order to allow for the intended development:

- **Subdivision of Erf RE/740 (Street), Keetmanshoop into Erf A and Remainder;**
- **Subdivision of Erf 510 (Street), Keetmanshoop into Erf B and Remainder;**
- **Permanent closure of Erf A/740 (A portion of Erf RE/740) and Erf B/510 (A portion of Erf 510), Keetmanshoop as “Street”;**
- **Rezoning of Erf A/740 (A portion of Erf RE/740) and Erf B/510 (A portion of Erf 510) from “Street” to “Institutional”;**
- **Consolidation of Erven A/740 (Street), B/510 (Street), RE/741, 2002 and 2003, Keetmanshoop into Consolidated Erf X.**

The above development triggers listed activities in terms of the Environmental Management Act (No. 7 of 2007) and Environmental Impact Assessment Regulations (Government Notice No. 30 of 2012) which may not be undertaken without an Environmental Clearance Certificate (ECC).

An Environmental Management Plan (EMP) is one of the most important outputs of the EIA process as it synthesises all of the proposed mitigation and monitoring actions, set to a timeline and with specific assigned responsibilities. This EMP details the mitigation and monitoring actions to be implemented during the following phases of these developments:

- Planning and Design – the period, prior to construction, during which preliminary legislative and administrative arrangements, necessary for the preparation of the proposed development carried out. The preparation of construction tender documents forms part of this phase;

- Construction – the period during which the proponent, having dealt with the necessary legislative and administrative arrangements, appoints a contractor for the development and construction of the proposed development as well as any other construction process(s) within the development areas;
- Operation and Maintenance – the period during which the street and associated expansion of classrooms at the school will be fully functional and maintained.

The decommissioning of these developments is not envisaged; as such the decommissioning phase is not discussed.

## **2 PROPOSED DEVELOPMENT**

The Keetmanshoop Private School is currently operating on Erven RE/741, 2002 and 2003, Keetmanshoop. The subject erven are situated adjacent one another, with a portion of Twelfth Street (proposed Erf A/740, Keetmanshoop) situated between Erf 2003 and Erven RE/741 and 2002, Keetmanshoop.

Proposed Erf A/740, Keetmanshoop (street) is currently leased by the proponent and used as parking and as a drop off area where parents drop off learners in the morning and pick up them up in the afternoon. This portion of the street is frequently used by learners, teachers, and staff members of the Private School to access the school hostel, offices and classrooms which are situated on Erven RE/741, 2002 and 2003, respectively. A pedestrian crossing to calm traffic and ease pedestrian movements between the different components of the school has been built over proposed Erf A/740, Keetmanshoop (street).

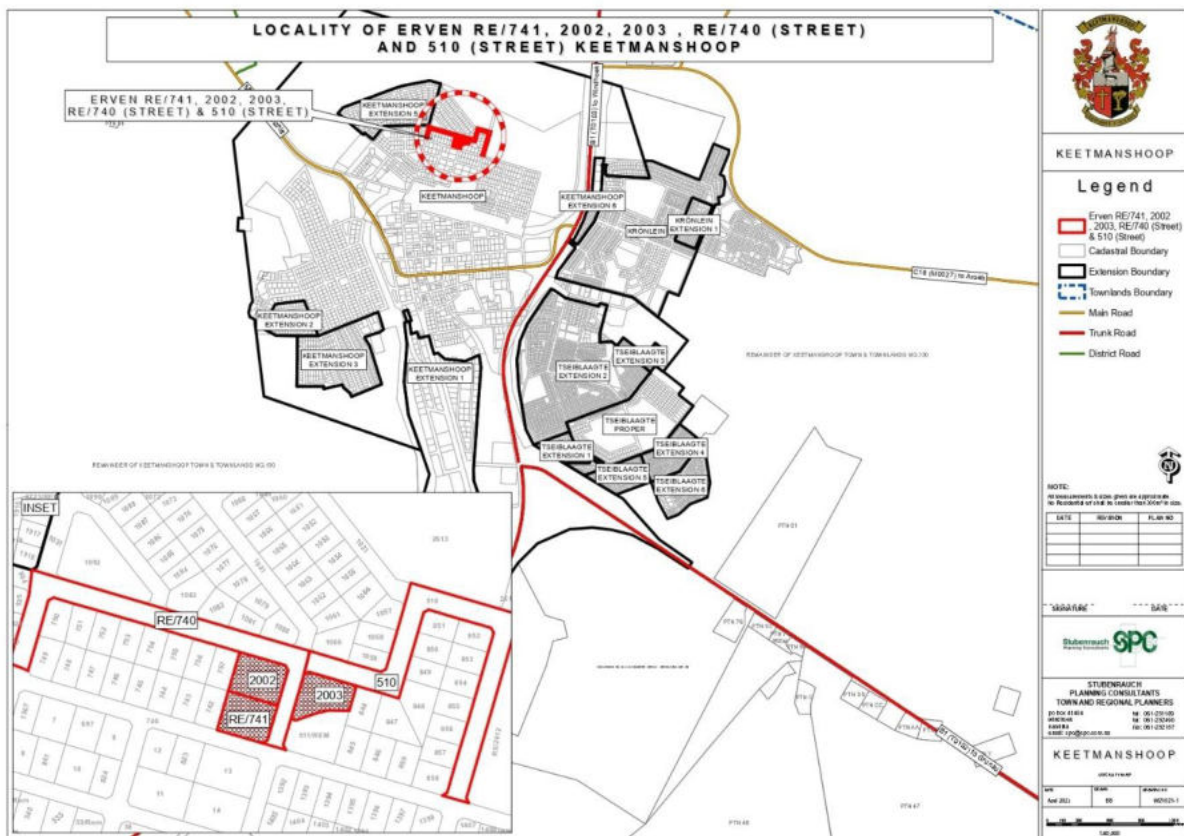
This portion of the street is however not restricted for the use of the school only, as such it is used by the general public to access other parts of the surrounding neighbourhood. This constitutes a safety hazard as some drivers are reckless and do not maintain minimum speed when entering this street that is mainly used by learners. This has over the years lead to several incidents where learners have almost been hit by oncoming traffic. In addition, the free use of the subject portion of this street by the general public has also challenged the school's ability to monitor movements around the school premises and ensure the safety of its learners and properties.

In light of the above, the Keetmanshoop Private School seeks to purchase a portion of Erf 740 and a portion of Erf 510, Keetmanshoop (proposed Erf A/740 and Erf B/510, Keetmanshoop) (streets), from the Municipality for consolidation with Erven RE/741, 2002 and 2003, Keetmanshoop into Consolidated Erf "X".

The proponent intends to fence off proposed Consolidated Erf “X” to ensure the safety of learners and protect the school premises, as the street will then be restricted to the use of the school only. Given that the proposed Erf A/740 (street), currently accommodates water pipelines, no construction of buildings will take place over the street. The street will only be used as parking and as a drop-off area for learners.

The proposed development will also allow the school to expand its classrooms in line with the building regulations of the Keetmanshoop Municipality. This expansion will take place on Erf 2003. No buildings will be constructed over Portion A/740 (street).

Erven RE/741, 2002 and 2003 are located next to each other along Twelfth Street (also known as Erf RE/740, Keetmanshoop) in Keetmanshoop as shown in **Figure 2-1** below.



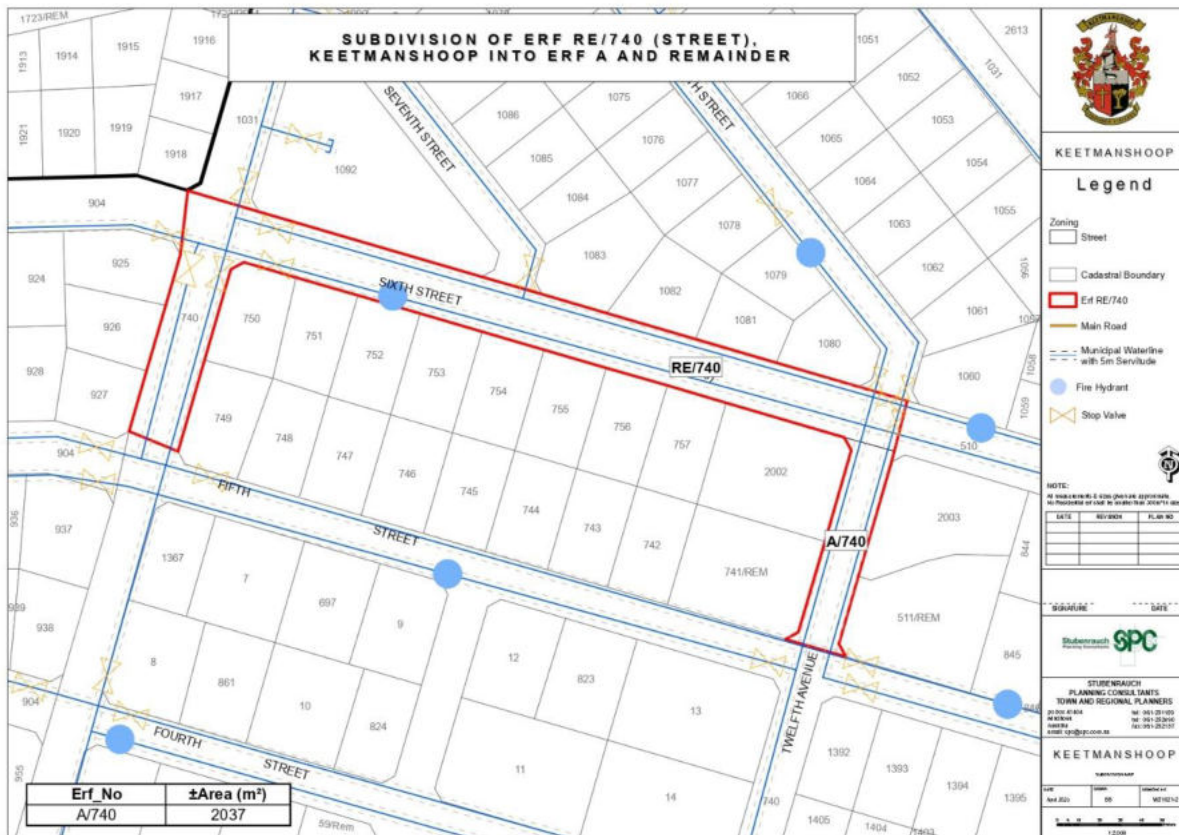
**Figure 2-1:** Locality of proposed development in Keetmanshoop

### 2.1 The Proposed Subdivision

The proponent intends to subdivide Erf RE/740, Keetmanshoop (street) into Erf A and the Remainder and Erf 510, Keetmanshoop (street) into Erf B and the Remainder as depicted by **Table 2-1, Figure 2-2, and Figure 2-3** below.

**Table 2-1:** Subdivision of Erf 740 and Erf 510, Keetmanshoop (Street)

Erf No.	Size ±m <sup>2</sup>	Reservation	Proposed Zoning
A/740, Keetmanshoop	2037.00	Street	Institutional
B/510, Keetmanshoop	12.5	Street	Institutional



**Figure 2-2:** Subdivision of RE/Erf 740 (Street) Keetmanshoop into Erf A and Remainder

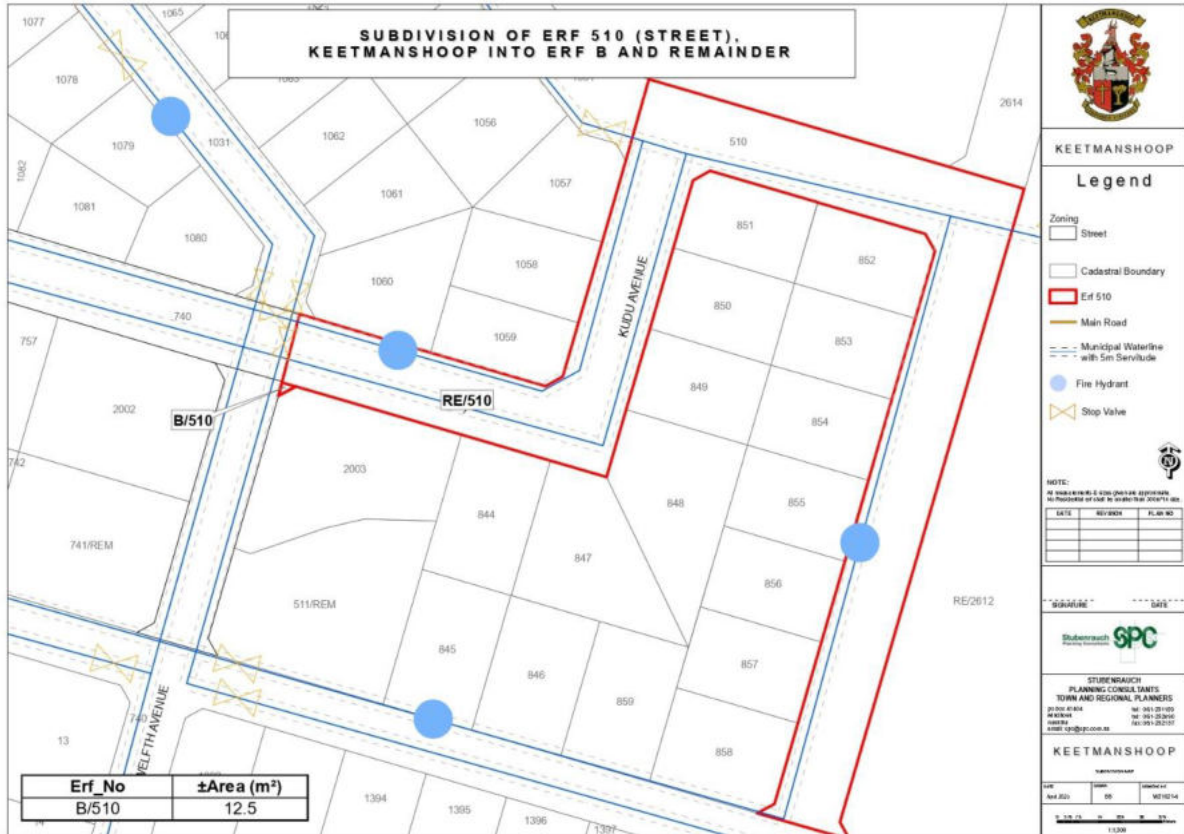
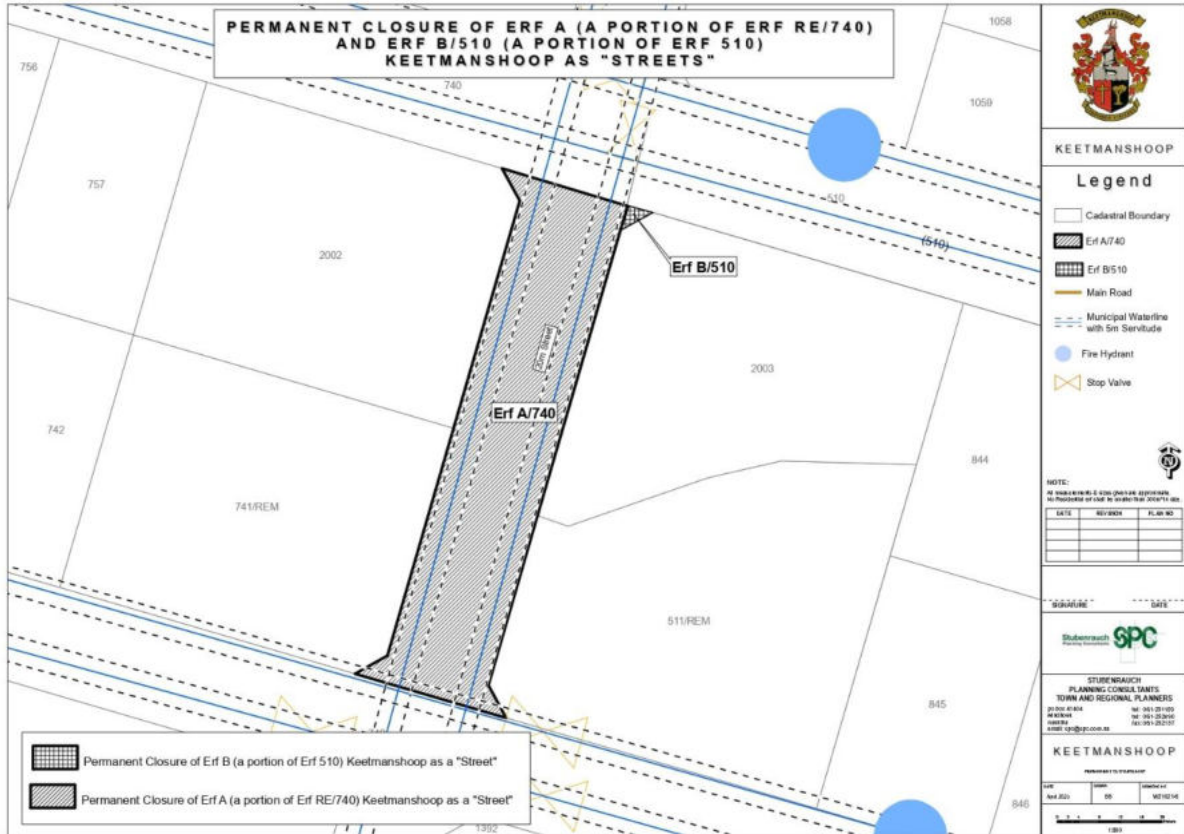


Figure 2-3: Subdivision of Erf 510 (Street) Keetmanshoop into Erf B and Remainder

## 2.2 The Proposed Permanent Closure and Rezoning

The Proponent intends to Permanently close Erf A/740 and Erf B/510, Keetmanshoop (streets) as a “Streets” and rezone Erf A and Erf B to “Institutional” to enable its consolidation with Erven RE/741, 2002 and 2003, Keetmanshoop, which are all currently zoned for “Institutional” purposes as shown in Figure 2-4 below.





**Figure 2-4:** Permanent closure of Erf A (a portion of Erf 740) and Erf B/510 (a portion of Erf 510), Keetmanshoop as “streets”

**2.3 The Proposed Consolidation**

The proponent Further aims to consolidate Erf A/740 with Erven Erf B/510, RE/741, 2002 and 2003 into Consolidated Erf “X”. Consolidated Erf “X” will be utilised for institutional purposes as indicated in **Table 2-2** and **Figure 2-5** below.

**Table 2-2:** Consolidation of Erf A/740 with Erven B/510, RE/741, 2002 and 2003, Keetmanshoop

Erf No.	Size ±m <sup>2</sup>	Current Zoning	Proposed Zoning
A/740, Keetmanshoop	2037.00	Street	Institutional
B/510, Keetmanshoop	12.5	Street	Institutional
RE/741, Keetmanshoop	3163.00	Institutional	Institutional
2002, Keetmanshoop	3001.00	Institutional	
2003, Keetmanshoop	3162.00	Institutional	
<b>Consolidated Erf “X”</b>	<b>11376.00</b>		<b>Institutional</b>



**Figure 2-5:** Consolidation of Erven RE/741, Erf A/740, Erf B/510, Erf 2002 and Erf 2003, Keetmanshoop into Consolidated Erf “X”

### 3 ROLES AND RESPONSIBILITIES

The proponent (Keetmanshoop Private School) is ultimately responsible for the implementation of the EMP, from the planning and design phase to the decommissioning phase (if these developments are in future decommissioned) of these developments. The proponent will delegate this responsibility as the project progresses through its life cycle. The delegated responsibility for the effective implementation of this EMP will rest on the following key individuals:

- Proponents’ Representative;
- Environmental Control Officer; and
- Contractor (Construction and Operations and Maintenance).

### 3.1 DEVELOPER'S REPRESENTATIVE

The Keetmanshoop Private School should assign the responsibility of managing all aspects of these developments for all development phases (including all contracts for work outsourced) to a designated member of staff, referred to in this EMP as the Proponent's representative (PR). The proponent may decide to assign this role to one person for the full duration of these developments, or may assign a different PR to each of the development phases – i.e. one for the planning and design phase, one for the construction phase and one for the operation and maintenance phase. The PR's responsibilities are as follows:

**Table 3-1** Responsibilities of PR

Responsibility	Project Phase
Making sure that the necessary approvals and permissions laid out in <b>Table 4-1</b> are obtained/adhered to.	<ul style="list-style-type: none"> <li>Throughout the lifecycle of these developments</li> </ul>
Making sure that the relevant provisions detailed in <b>Table 4-2</b> are addressed during planning and design phase.	<ul style="list-style-type: none"> <li>Planning and design phase</li> </ul>
Monitoring the implementation of the EMP monthly.	<ul style="list-style-type: none"> <li>Construction</li> <li>Operation and maintenance</li> </ul>
Suspending/evicting individuals and/or equipment not complying with the EMP	<ul style="list-style-type: none"> <li>Construction</li> <li>Operation and maintenance</li> </ul>
Issuing fines for contravening EMP provisions	<ul style="list-style-type: none"> <li>Construction</li> <li>Operation and maintenance</li> </ul>

### 3.2 ENVIRONMENTAL CONTROL OFFICER

The PR should assign the responsibility of overseeing the implementation of the whole EMP on the ground during the construction and operation and maintenance phases to an independent external consultant, referred to in this EMP as the Environmental Control Officer (ECO). The Proponent may decide to assign this role to one person for both phases, or may assign a different ECO for each phase. The ECO will have the following responsibilities during the construction and operation and maintenance phases of these developments:

- Management and facilitation of communication between the Proponent, DR, the contractors, and Interested and Affected Parties (I&APs) with regard to this EMP;
- Conducting site inspections (recommended minimum frequency is monthly) of all construction and/or infrastructure maintenance areas with respect to the implementation of this EMP (audit the implementation of the EMP);

- Assisting the Contractor in finding solutions with respect to matters pertaining to the implementation of this EMP;
- Advising the DR on the removal of person(s) and/or equipment not complying with the provisions of this EMP;
- Making recommendations to the DR with respect to the issuing of fines for contraventions of the EMP; and
- Undertaking an annual review and bi-annual audit of the EMP and recommending additions and/or changes to this document.

### **3.3 CONTRACTOR**

Contractors appointed by the Keetmanshoop Private School are automatically responsible for implementing all provisions contained within the relevant chapters of this EMP. Contractors will be responsible for the implementation of this EMP applicable to any work outsourced to subcontractors. **Table 4-3** applies to contractors appointed during the construction phase and **Table 4-4** to those appointed during the operation and maintenance phase. In order to ensure effective environmental management, the aforementioned chapters should be included in the applicable contracts for outsourced construction, operation and maintenance work.

The tables in the following chapter (**Chapter 4**) detail the management measures associated with the roles and responsibilities that have been laid out in this chapter.

## 4 MANAGEMENT ACTIONS

The aim of the management actions in this chapter of the EMP is to avoid potential impacts where possible. Where impacts cannot be avoided, measures are provided to reduce the significance of these impacts.

The following tables provide the management actions recommended to manage the potential impacts rated in the scoping-level EA conducted for these developments. These management actions have been organised temporally according to project phase:

- Applicable legislation (**Table 4-1**);
- Planning and design phase management actions (**Table 4-2**);
- Construction phase management actions (**Table 4-3**);
- Operation and maintenance phase management actions (**Table 4-4**); and
- Decommissioning phase management actions (**Error! Reference source not found.**).

The proponent should assess these **commitments** in detail and should acknowledge their commitment to the specific management actions detailed in the tables below.

### 4.1 ASSUMPTIONS AND LIMITATIONS

This EMP has been drafted with the acknowledgment of the following assumptions and limitations:

- This EMP has been drafted based on the scoping-level Environmental Assessment (EA) conducted for the proposed development as outlined in **Section 4** of the Draft Environmental Scoping Report. SPC will not be held responsible for the potential consequences that may result from any alterations to the above-mentioned layout.
- It is assumed that construction labourers will be sourced mostly from the Keetmanshoop townlands area and that migrant labourers (if applicable) will be housed in established accommodation facilities within Keetmanshoop.
- No engineering designs have been carried out for the development of the associated services infrastructure (roads, potable water, storm water, sewerage and electrical reticulations).

## 4.2 APPLICABLE LEGISLATION

Legal provisions that have relevance to various aspects of these developments are listed in **Table 4-1** below.

**Table 4-1:** Legislation applicable to proposed development

LEGISLATION/POLICIES	RELEVANT PROVISIONS	RELEVANCE TO PROJECT
The Constitution of the Republic of Namibia as Amended	<p>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.”</p> <p>Article 95(l) deals with the “maintenance of ecosystems, essential ecological processes and biological diversity” and sustainable use of the country’s natural resources.</p>	Sustainable development should be at the forefront of this development.
Environmental Management Act No. 7 of 2007 (EMA)	<p>Section 2 outlines the objective of the Act and the means to achieve that.</p> <p>Section 3 details the principle of Environmental Management</p>	The development should be informed by the EMA.
EIA Regulations GN 28, 29, and 30 of EMA (2012)	<p>GN 29 Identifies and lists certain activities that cannot be undertaken without an environmental clearance certificate.</p> <p>GN 30 provides the regulations governing the environmental assessment (EA) process.</p>	<p>The following listed activity was triggered by the proposed development:</p> <p><b>Activity 10.1 (b) Infrastructure</b></p> <p><b>Activity 10.2 (a) Infrastructure</b></p>
Convention on Biological Diversity (1992)	Article 1 lists the conservation of biological diversity amongst the objectives of the convention.	The project should consider the impact it will have on the biodiversity of the area.
Draft Procedures and Guidelines for conducting EIAs and compiling EMPs (2008)	Part 1, Stage 8 of the guidelines states that if a proposal is likely to affect people, certain guidelines should be considered by the proponent in the scoping process.	The EA process should incorporate the aspects outlined in the guidelines.
Namibia Vision 2030	Vision 2030 states that the solitude, silence and natural beauty that many areas in Namibia provide are becoming sought after commodities and must be regarded as valuable natural assets.	Care should be taken that the development does not lead to the degradation of the natural beauty of the area.

LEGISLATION/POLICIES	RELEVANT PROVISIONS	RELEVANCE TO PROJECT
Water Act No. 54 of 1956	Section 23(1) deals with the prohibition of pollution of underground and surface water bodies.	The pollution of water resources should be avoided during construction and operation of the development.
The Ministry of Environment and Tourism (MET) Policy on HIV & AIDS	MET has recently developed a policy on HIV and AIDS. In addition, it has also initiated a programme aimed at mainstreaming HIV and gender issues into environmental impact assessments.	The proponent and its contractor must adhere to the guidelines provided to manage the aspects of HIV/AIDS. Experience with construction projects has shown that a significant risk is created when migrant construction workers interact with local communities.
Urban and Regional Planning Act 5 of 2018	The Act provides to consolidate the laws relating to urban and regional planning; to provide for a legal framework for spatial planning in Namibia; to provide for principles and standards of spatial planning; to establish the urban and regional planning board; to decentralise certain matters relating to spatial planning; to provide for the preparation, approval and review of the national spatial development framework, regional structure plans and urban structure plans; to provide for the preparation, approval, review and amendment of zoning schemes; to provide for the establishment of townships; to provide for the alteration of boundaries of approved townships, to provide for the disestablishment of approved townships; to provide for the change of name of approved townships; to provide for the subdivision and consolidation of land; to provide for the alteration, suspension and deletion of conditions relating to land; and to provide for incidental matters.	The subdivision and consolidation of land as well as the establishment of townships is to be done in accordance with the act.
Local Authorities Act No. 23 of 1992	The Local Authorities Act prescribes the manner in which a town or municipality	The development must comply with provisions of the Local Authorities Act.

LEGISLATION/POLICIES	RELEVANT PROVISIONS	RELEVANCE TO PROJECT
	should be managed by the Town or Municipal Council.	
Labour Act no. 11 of 2007	Chapter 2 details the fundamental rights and protections. Chapter 3 deals with the basic conditions of employment.	Given the employment opportunities presented by the development, compliance with the labour law is essential.
National Heritage Act No. 27 of 2004	The Act is aimed at protecting, conserving and registering places and objects of heritage significance.	All protected heritage resources (e.g. human remains etc.) discovered, need to be reported immediately to the National Heritage Council (NHC) and require a permit from the NHC before they may be relocated.
Roads Ordinance 17 of 1972	<ul style="list-style-type: none"> <li>• Section 3.1 deals with width of proclaimed roads and road reserve boundaries</li> <li>• Section 27.1 is concerned with the control of traffic on urban trunk and main roads</li> <li>• Section 36.1 regulates rails, tracks, bridges, wires, cables, subways or culverts across or under proclaimed roads</li> <li>• Section 37.1 deals with Infringements and obstructions on and interference with proclaimed roads.</li> </ul>	Adhere to all applicable provisions of the Roads Ordinance.
Public and Environmental Health Act of 2015	This Act (GG 5740) provides a framework for a structured uniform public and environmental health system in Namibia. It covers notification, prevention and control of diseases and sexually transmitted infections; maternal, ante-natal and neo-natal care; water and food supplies; infant nutrition; waste management; health nuisances; public	Contractors and users of the proposed development are to comply with these legal requirements.



LEGISLATION/POLICIES	RELEVANT PROVISIONS	RELEVANCE TO PROJECT
	and environmental health planning and reporting. It repeals the Public Health Act 36 of 1919 (SA GG 979).	
Nature Conservation Ordinance no. 4 of 1975	Chapter 6 provides for legislation regarding the protection of indigenous plants	Indigenous and protected plants must be managed within the legal confines.
Water Quality Guidelines for Drinking Water and Wastewater Treatment	Details specific quantities in terms of water quality determinants, which wastewater should be treated to before being discharged into the environment	These guidelines are to be applied when dealing with water and waste treatment.
Environmental Assessment Policy of Namibia (1995)	The Policy seeks to ensure that the environmental consequences of development projects and policies are considered, understood and incorporated into the planning process, and that the term ENVIRONMENT is broadly interpreted to include biophysical, social, economic, cultural, historical and political components.	This EIA considers this term of Environment.
Water Resources Management Act No. 11 of 2013	Part 12 deals with the control and protection of groundwater  Part 13 deals with water pollution control	The pollution of water resources should be avoided during construction and operation of the development. Should water need to be abstracted, a water abstraction permit will be required from the Ministry of Water, Agriculture and Forestry.
Forest Act 12 of 2001 and Forest Regulations of 2015	To provide for the establishment of a Forestry Council and the appointment of certain officials; to consolidate the laws relating to the management and use of forests and forest produce; to provide for the protection of the environment and the control and management of forest fires; to repeal the Preservation of Bees and Honey	Protected tree and plant species as per the Forest Act No 12 of 2001 and Forest Regulations of 2015 may not be removed without a permit from the Ministry of Agriculture, Water and Forestry.

LEGISLATION/POLICIES	RELEVANT PROVISIONS	RELEVANCE TO PROJECT
	<p>Proclamation, 1923 (Proclamation No. 1 of 1923), Preservation of Trees and Forests Ordinance, 1952 (Ordinance No. 37 of 1952) and the Forest Act, 1968 (Act No. 72 of 1968); and to deal with incidental matters.</p>	
<p>Atmospheric Pollution Prevention Ordinance No 45 of 1965</p>	<p>Part II - control of noxious or offensive gases,                      Part III - atmospheric pollution by smoke,                      Part IV - dust control, and                      Part V - air pollution by fumes emitted by vehicles.</p>	<p>The development should consider the provisions outlined in the act. The proponent should apply for an Air Emissions permit from the Ministry of Health and Social Services (if needed).</p>
<p>Hazardous Substance Ordinance 14 of 1974</p>	<p>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.</p>	<p>The handling, usage and storage of hazardous substances on site should be carefully controlled according to this Ordinance.</p>
<p>Soil Conservation Act No 76 of 1969</p>	<p>Act to consolidate and amend the law relating to the combating and prevention of soil erosion, the conservation, improvement and manner of use of the soil and vegetation and the protection of the water sources</p>	<p>The proposed activity should ensure that soil erosion and soil pollution is avoided during construction and operation.</p>

### 4.3 PLANNING AND DESIGN PHASE

The PR should ensure that the management actions detailed below should be adhered to during the period before the proposed construction starts.

**Table 4-2:** Planning and design management actions

Aspect	Management Actions
Traffic	<ul style="list-style-type: none"><li>• Ensure that road junctions have good sightlines.</li><li>• Provide formal road crossings at relevant areas.</li><li>• Provide for speed reducing interventions such as speed bumps at relevant road sections.</li><li>• Adhere to the speed limit.</li></ul>

#### 4.4 CONSTRUCTION PHASE

The management actions listed in **Table 4-3** apply during the construction phase. This table may be used as a guide when developing EMPs for other construction activities within these development areas.

**Table 4-3:** Construction phase management actions

Environmental Feature	Impact	Management Actions	Responsible Person
EMP training	Lack of EMP awareness and the implications thereof.	All construction workers are to undergo EMP training that should include as a minimum the following: <ul style="list-style-type: none"> <li>• Explanation of the importance of complying with the EMP.</li> <li>• Discussion of the potential environmental impacts of construction activities.</li> <li>• Employees’ roles and responsibilities, including emergency preparedness.</li> <li>• Explanation of the mitigation measures that must be implemented when particular work groups carry out their respective activities.</li> </ul>	Contractor
Conservation of vegetation	Loss of biodiversity	<ul style="list-style-type: none"> <li>• The layout and development design should incorporate existing trees<sup>1</sup>.</li> <li>• Trees protected under the Forestry Act 12 of 2001 should be protected within the development and may not be removed without a permit from the Department of Forestry.</li> <li>• Only a limited width +/- 5 m on the side of roads may be partially cleared of vegetation.</li> <li>• Workers are prohibited from collecting wood or other plant products on or near work sites.</li> </ul>	Contractor

<sup>1</sup>a “tree” is defined as an indigenous woody perennial plant with a trunk diameter  $\geq 150$  mm.

Environmental Feature	Impact	Management Actions	Responsible Person
		<ul style="list-style-type: none"> <li>• No alien species may be planted on or near work areas.</li> </ul>	
Lay-down areas and materials camp	Loss of biodiversity	<p>Suitable locations for the contractors lay-down areas and materials camp should be identified with the assistance of the PR and the following should be considered in selecting these sites:</p> <ul style="list-style-type: none"> <li>• The areas designated for the services infrastructure should be used as far possible.</li> <li>• Second option should be degraded land.</li> <li>• Avoid sensitive areas (e.g. rivers/drainage lines).</li> </ul>	Contractor and PR
Hazardous waste	Contamination of surface and groundwater sources.	<ul style="list-style-type: none"> <li>• All heavy construction vehicles and equipment on site should be provided with a drip tray.</li> <li>• All heavy construction vehicles should be maintained regularly to prevent oil leakages.</li> <li>• Maintenance and washing of construction vehicles should take place only at a designated workshop area.</li> </ul>	Contractor
Water, Sewage and grey water	Contamination of surface and groundwater sources and water wasting	<ul style="list-style-type: none"> <li>• The wash water (grey water) collected from the cleaning of equipment on-site should not be left standing for long periods of time as this promotes parasite and bacterial proliferation.</li> <li>• Grey water should be recycled:                             <ul style="list-style-type: none"> <li>○ Used for dust suppression;</li> <li>○ Used to water a vegetable garden, or to support a small nursery;</li> </ul> </li> </ul>	Contractor

Environmental Feature	Impact	Management Actions	Responsible Person
		<ul style="list-style-type: none"> <li>○ Used (reused) to clean equipment.</li> <li>● Grey water that is not recycled should be removed on a regular basis.</li> <li>● No dumping of waste products of any kind in or in close proximity to water bodies.</li> <li>● Heavy construction vehicles should be kept out of any water bodies and the movement of construction vehicles should be limited where possible to the existing roads and tracks.</li> <li>● Ensure that oil/ fuel spillages from construction vehicles and machinery are minimised and that where these occur, that they are immediately and appropriately dealt with.</li> <li>● Drip trays must be placed underneath construction vehicles when not in use to contain all oil that might be leaking from these vehicles.</li> <li>● Contaminated runoff from the construction sites should be prevented from entering the surface and ground water bodies.</li> <li>● All materials on the construction site should be properly stored.</li> <li>● Disposal of waste from the sites should be properly managed and taken to the designated landfill site in Keetmanshoop.</li> <li>● Construction workers should be given ablution facilities at the construction sites that are located at least 30 m away from any surface</li> </ul>	

Environmental Feature	Impact	Management Actions	Responsible Person
		<p>water and ground water resources and should be regularly serviced.</p> <ul style="list-style-type: none"> <li>Washing of personnel or any equipment should not be allowed on site. Should it be necessary to wash construction equipment these should be done at an area properly suited and prepared to receive and contain polluted waters.</li> </ul>	
General waste	Visual impact and soil contamination	<ul style="list-style-type: none"> <li>The construction site should be kept tidy at all times.</li> <li>All domestic and general construction waste produced on a daily basis should be cleaned and contained daily.</li> <li>No waste may be buried or burned.</li> <li>Waste containers (bins) should be emptied regularly and removed from site to a recognised (municipal) waste disposal site.</li> <li>All recyclable waste needs to be taken to the nearest recycling depot where practical.</li> <li>A sufficient number of separate bins for hazardous and domestic/general waste must be provided on site. These should be clearly marked as such.</li> <li>Construction labourers should be sensitised to dispose of waste in a responsible manner and not to litter.</li> <li>No waste may remain on site after the completion of the project.</li> </ul>	Contractor

Environmental Feature	Impact	Management Actions	Responsible Person
Topsoil	Loss of topsoil and associated opportunity costs	<ul style="list-style-type: none"> <li>• When excavations are carried out, topsoil<sup>2</sup> should be stockpiled in a demarcated area.</li> <li>• Stockpiled topsoil should be used to rehabilitate post-construction degraded areas and/or other nearby degraded areas if such an area is located a reasonable distance from the stockpile.</li> </ul>	Contractor
Rehabilitation	Visual impact	<ul style="list-style-type: none"> <li>• Upon completion of the construction phase consultations should be held with the local community/property owner(s) regarding the post-construction use of remaining excavated areas (if applicable).</li> <li>• In the event that no post-construction uses are requested, all excavated/degraded areas need to be rehabilitated as follows:               <ul style="list-style-type: none"> <li>○ Excavated areas may only be backfilled with clean or inert fill. No material of hazardous nature (e.g. sand removed with an oil spill) may be dumped as backfill.</li> <li>○ Rehabilitated excavated areas need to match the contours of the existing landscape.</li> <li>○ The rehabilitated area should not be higher (or lower) than nearby drainage channels. This ensures the efficiency of revegetation and reduces the chances of potential erosion.</li> <li>○ Topsoil is to be spread across excavated areas evenly.</li> </ul> </li> </ul>	Contractor, PR

<sup>2</sup> Topsoil is defined here as the top 150mm of surface material, which accounts for the seedbank.



Environmental Feature	Impact	Management Actions	Responsible Person
		<ul style="list-style-type: none"> <li>○ Deep ripping of areas to be rehabilitated is required, not just simple scarification, so as to enable rip lines to hold water after heavy rainfall.</li> <li>○ Ripping should be done along slopes, not up and down a slope, which could lead to enhanced erosion.</li> </ul>	
Road safety	Injury or loss of life	<ul style="list-style-type: none"> <li>● Demarcate roads to be used by construction vehicles clearly.</li> <li>● Off-road driving should not be allowed.</li> <li>● All vehicles that transport materials to and from the site must be roadworthy.</li> <li>● Drivers that transport materials should have a valid driver’s license and should adhere to all traffic rules.</li> <li>● Loads upon vehicles should be properly secured to avoid items falling off the vehicle.</li> </ul>	Contractor
Safety around work sites	Injury or loss of life	<ul style="list-style-type: none"> <li>● Excavations should be left open for the shortest time possible.</li> <li>● Excavate short lengths of trenches and box areas for services or foundations in a manner that will not leave the trench unattended for more than 24 hours.</li> <li>● Demarcate excavated areas and topsoil stockpiles with danger tape.</li> <li>● All building materials and equipment are to be stored only within set out and demarcated work areas.</li> </ul>	Contractor

Environmental Feature	Impact	Management Actions	Responsible Person
		<ul style="list-style-type: none"> <li>• Only road construction personnel will be allowed within these work areas.</li> <li>• Comply with all waste related management actions stated above in this table.</li> </ul>	
Ablutions	Non-compliance with Health and Safety Regulations	<ul style="list-style-type: none"> <li>• Separate toilets should be available for men and women and should clearly be indicated as such.</li> <li>• Portable toilets (i.e. easily transportable) should be available at every construction site:                             <ul style="list-style-type: none"> <li>○ 1 toilet for every 15 females.</li> <li>○ 1 toilet for every 30 males.</li> <li>○ Sewage needs to be removed on a regular basis to an approved (municipal) sewage disposal site in Keetmanshoop.</li> <li>○ Alternatively, sewage may be pumped into sealable containers and stored until it can be removed.</li> <li>○ Workers responsible for cleaning the toilets should be provided with environmentally friendly detergents, latex gloves and masks.</li> </ul> </li> </ul>	Contractor
Open fires	Injury or loss of life	<ul style="list-style-type: none"> <li>• No open fires may be made anywhere on site.</li> </ul>	Contractor
General health and safety	Injury or loss of life	<ul style="list-style-type: none"> <li>• A fully stocked first aid kit should permanently be available on-site as well as an adequately trained member of staff capable of administering first aid.</li> </ul>	Contractor

Environmental Feature	Impact	Management Actions	Responsible Person
		<ul style="list-style-type: none"> <li>• All workers should have access to and wear the relevant personal protective equipment (PPE).</li> <li>• Sufficient potable water reserves should be available to workers at all times.</li> <li>• No person should be allowed to smoke close to fuel storage facilities or portable toilets (if toilets are chemical toilets – the chemicals are flammable).</li> <li>• No workers should be allowed to drink alcohol during work hours.</li> <li>• No workers should be allowed on site if under the influence of alcohol.</li> <li>• Building rubble and domestic waste should be stored in skips.</li> <li>• Condoms should be accessible/available to all construction workers.</li> <li>• Access to Antiretroviral medication should be facilitated.</li> </ul>	
Dust	Nuisance and health impacts	<ul style="list-style-type: none"> <li>• A watering truck should be used on gravel roads with the heaviest vehicle movement especially during dry and windy conditions. However, due consideration should be given to water restrictions during times of drought.</li> <li>• The use of waterless dust suppression means (e.g. lignosulphonate products such as Dustex) should be considered.</li> <li>• Cover any stockpiles with plastic to minimise windblown dust.</li> </ul>	Contractor

Environmental Feature	Impact	Management Actions	Responsible Person
		<ul style="list-style-type: none"> <li>Dust protection masks should be provided to workers if they complain about dust.</li> </ul>	
Noise	Nuisance impacts	<p>Work hours should be restricted to between 08h00 and 17h00 where construction involving the use of heavy equipment, power tools and the movement of heavy vehicles is less than 500 m from residential areas. If an exception to this provision is required, all residents within the 500 m radius should be given 1 week's written notice.</p>	Contractor
Recruitment of labourers	Negative conflict regarding recruitment	<p>The Contractor should adhere to the following provisions as a minimum:</p> <ul style="list-style-type: none"> <li>Adhere to the legal provisions in the Labour Act for the recruitment of labour (target percentages for gender balance, optimal use of local labour and SME's, etc.).</li> <li>Recruitment should not take place at construction sites.</li> <li>Ensure that all sub-contractors are aware of recommended recruitment procedures and discourage any recruitment of labour outside these agreed upon procedures.</li> <li>Contractors should give preference in terms of recruitment of sub-contractors and individual labourers to those who are qualified and from the Keetmanshoop project area and only then look to surrounding towns.</li> </ul>	Contractor

Environmental Feature	Impact	Management Actions	Responsible Person
		<ul style="list-style-type: none"> <li>Clearly explain to all jobseekers the terms and conditions of their respective employment contracts (e.g. period of employment etc.) – make use of interpreters where necessary.</li> </ul>	
Communication plan	Negative conflict with I&APs	<p>The Contractor or proponent should draft a Communication Plan, which should outline as a minimum the following:</p> <ul style="list-style-type: none"> <li>How Interested and Affected Parties (I&amp;APs), who require ongoing communication for the duration of the construction period, will be identified and recorded and who will manage and update these records.</li> <li>How these I&amp;APs will be consulted on an ongoing basis.</li> <li>Make provision for grievance mechanisms – i.e. how concerns can be lodged/ recorded and how feedback will be delivered as well as further steps of arbitration in the event that feedback is deemed unsatisfactory.</li> </ul>	Contractor, Proponent
General communication	Negative conflict with I&APs	<ul style="list-style-type: none"> <li>The PR must appoint an ECO to liaise between the Contractor, I&amp;APs, Developer.</li> <li>The Contractor shall at every monthly site meeting report on the status of the implementation of all provisions of the EMP.</li> <li>The Contractor should implement the EMP awareness training as stipulated above in this table.</li> </ul>	Contractor, ECO, PR

Environmental Feature	Impact	Management Actions	Responsible Person
		<ul style="list-style-type: none"> <li>• The Contractor must list I&amp;APs of the project and their contact details with whom ongoing communication would be required for the duration of the contract. This list, together with the Communication Plan must be agreed upon and given to the PR before construction commences.</li> <li>• The Communication Plan, once agreed upon by the Developer, shall be legally binding.</li> <li>• All communication with I&amp;APs must take place through the ECO.</li> <li>• A copy of the EMP must be available at the site office and should be accessible to all I&amp;APs.</li> <li>• Key representatives from the above-mentioned list need to be invited to attend monthly site meetings to raise any concerns and issues regarding project progress.</li> <li>• The Contractor should liaise with the Developer regarding all issues related to community consultation and negotiation before construction commences.</li> <li>• A procedure should be put in place to ensure that concerns raised have been followed-up and addressed.</li> <li>• All people on the I&amp;APs list should be informed about the availability of the complaints register and associated grievance mechanisms in writing by the PR prior to the commencement of construction activities.</li> </ul>	

Environmental Feature	Impact	Management Actions	Responsible Person
Archaeology	Loss of heritage resources	<ul style="list-style-type: none"> <li>• Should a heritage site or archaeological site be uncovered or discovered during the construction phase of the project, a “chance find” procedure should be applied in the order they appear below:                             <ul style="list-style-type: none"> <li>○ If operating machinery or equipment, stop work;</li> <li>○ Demarcate the site with danger tape;</li> <li>○ Determine GPS position if possible;</li> <li>○ Report findings to the construction foreman;</li> <li>○ Report findings, site location and actions taken to superintendent;</li> <li>○ Cease any works in immediate vicinity;</li> <li>○ Visit site and determine whether work can proceed without damage to findings;</li> <li>○ Determine and demarcate exclusion boundary;</li> <li>○ Site location and details to be added to the project’s Geographic Information System (GIS) for field confirmation by archaeologist;</li> <li>○ Inspect site and confirm addition to project GIS;</li> <li>○ Advise the National Heritage Council of Namibia (NHCN) and request written permission to remove findings from work area; and</li> </ul> </li> </ul>	Contractor

Environmental Feature	Impact	Management Actions	Responsible Person
		<ul style="list-style-type: none"> <li>○ Recovery, packaging and labelling of findings for transfer to National Museum.</li> <li>● Should human remains be found, the following actions will be required:                             <ul style="list-style-type: none"> <li>○ Apply the chance find procedure as described above;</li> <li>○ Schedule a field inspection with an archaeologist to confirm that remains are human;</li> <li>○ Advise and liaise with the NHCN and Police; and</li> <li>○ Remains will be recovered and removed either to the National Museum or the National Forensic Laboratory.</li> </ul> </li> </ul>	



#### 4.5 OPERATION AND MAINTENANCE PHASE

The management actions included in **Table 4-4** below apply during the operation and maintenance phase of these developments.

**Table 4-4: Operation and maintenance management actions**

Environmental Feature	Impact	Management Actions	Person Responsible
EMP training	Lack of EMP awareness and the implications thereof	All contractors appointed for maintenance work on the development must ensure that all personnel are aware of necessary health, safety and environmental considerations applicable to their respective work.	Contractor
Traffic	Traffic Impacts	<ul style="list-style-type: none"> <li>• Limit and control the number of access points to the site.</li> <li>• Ensure that road junctions have good sightlines.</li> <li>• Adhere to the speed limit.</li> <li>• Implement traffic control measures where necessary.</li> </ul>	Proponent
Noise	Noise nuisance impact	The proponent should consult with the view to incorporate the relevant local/national/international guidelines to manage the generation of traffic noise in the development area.	Proponent

#### 4.6 DECOMMISSIONING PHASE

The decommissioning of these developments is not foreseen as the intended development is envisaged to be permanent.

### 5 CONCLUSION

The management actions included in this report aim to assist in the avoidance, management and/or mitigation of potential impacts on the environment that may result from the proposed activities.

Should the measures recommended in this EMP be implemented and monitored, SPC is confident that the risks identified in the FESR can be reduced to acceptable levels.