

ENVIRONMENTAL IMPACT ASSESSMENT FOR THE PROPOSED DOBRA TELECOMMUNICATION BASE TRANSCEIVER STATION (BTS) TOWER AT DOBRA BRAKWATER, KHOMAS REGION-NAMIBIA.

ENVIRONMENTAL SCOPING REPORT

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D&P ENGINEERS
AND ENVIRONMENTAL CONSULTANTS
"Purpose with Passion"



PowerCom
(PTY) LTD



Proposed Construction & Operation of Dobra Base Transceiver Station Tower - Khomas Region: Namibia

Environmental Scoping Report (ESR)

Environmental Scoping Report Prepared for Powercom (Pty) Ltd

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DEFINITIONS

TERMS	DEFINITION
BID	Background Information Document
EAP	Environmental Assessment Practitioners
ECC	Environmental Clearance Certificate
ECO	Environmental Control Officer
EIA (R)	Environmental Impact Assessment (Report)
ESIA	Environmental and Social Impact Assessment
EMP	Environmental Management Plan
EMPr	Environmental Management Plan Report
GHG	Greenhouse Gasses
ISO	International Organization for Standardization
I&Aps	Interested and Affected Parties
MET: DEA	Ministry of Environment and Tourism's Directorate of Environmental Affairs
NHC	National Heritage Council
NEMA	Namibia Environmental Management Act
ToR	Terms of Reference
UNFCCC	United Nations Framework Convention on Climate Change

i. Purpose of This Environmental Impact Assessment Report

This Environmental Scoping Report (ESR) follows the Scope of Work delineated by POWERCOM Pty Ltd. Existing information and input from commenting authorities, Interested and Affected Parties (I&APs) was used to identify and evaluate potential environmental impacts (both social and biophysical) associated with the proposed project.

Environmental flaws associated with the proposed project were identified through the ESR. A conscious decision was made based on the recommendations and guidelines of the Directorate of Environmental Affairs EIA guidelines to assess both significant and less significant environmental impacts proposed by the development. The developed Environmental Management Plan (EMP) for this proposed activity will have to be effectively implemented by the client, to ensure that adverse environmental impacts are not considered.

A detailed assessment of the anticipated impacts was undertaken to highlight any areas of concern regarding the proposed project during its construction, and operation. In addition, an independent sensitivity mapping analysis was undertaken. This analysis characterised the development site on the significant environmental aspects to reflect the site's suitable and unsuitable (no-go) development footprint areas. This action guided the final footprint of the PV Plant and the transmission line.

This report will also be used to motivate and define the previously identified project alternatives (i.e. site, technology, and layout) based on the findings of the environmental baseline study and the suitability of the site to the type of development. This EIAR has been compiled in accordance with the regulatory requirements stipulated in the EIA Regulations (2012), promulgated in terms of the Namibian environmental legislation (Environmental Management Act (No. 7 of 2007))

The ESR aims to:

- Provide an overall assessment of the social, physical, and biophysical environments of the area affected by the proposed establishment of the base transceiver station tower (BTS);
- Undertake a detailed environmental assessment, in terms of environmental criteria and impacts (direct, indirect, and cumulative), and recommend a preferred location for the proposed plant (based on environmental sensitivity);

- Identify and recommend appropriate mitigation measures for potentially significant environmental impacts; and
- Undertake a fully inclusive Public Participation Process (PPP)
- GIS sensitivity mapping was conducted to identify potential impacts, propose mitigation and inform the sensitivity analysis.

ii. Assumptions And Limitations

The following assumptions and limitations underpin the approach to this EIA study:

- The information received from the stakeholders, desktop surveys, and baseline assessments are current and valid at the time of the study;
- A precautionary approach was adopted in instances where baseline information was insufficient or unavailable;
- Mandatory timeframes will apply to the review and adjudication of the reports by the competent authority and other government departments; and
- **No land claims have been registered for the proposed site at the onset and registration of the study.**

NB: The EAP does not accept any responsibility in the event that additional information comes to light at a later stage of the process. All data from unpublished research utilised for the purposed of this project is valid and accurate. The scope of this investigation is limited to assessing the potential biophysical, social and cultural impacts associated with the proposed project.

1. CHAPTER ONE: BACKGROUND

1.1. Introduction

POWERCOM (PTY) LTD herein referred to as the proponent has identified different areas that need improved communication alternatives in Namibia due to the growth in population and economic activities. To achieve the objective of improved telecommunication connectivity, POWERCOM has been appointed by Telecom Namibia, its sister company to establish telecommunication towers across the different locations countrywide and Dobra is one of the areas identified. The development is earmarked to expand connectivity, decongest connectivity and promote ICT in rural and peri-urban environments.

However, the telecommunication towers cannot be constructed without prior consent from interested and affected parties as well as obtaining an Environmental Clearance Certificate for development. In this respect, D&P Engineers and Environmental Consultants cc has been appointed as an Environmental Assessment consultant to carry out an Environmental and Social Impact Assessment study to obtain an environmental clearance certificate as per the requirements of the Environmental Management Act No. 7 of 2007 and Namibian Environmental Impact Assessment Regulations of 2012 in terms of telecommunication infrastructure.

1.2. Project Location

The proposed tower is to be erected at Dobra Catholic centre in Brakwater, Khomas region. The site coordinates are indicated as follows:

- Latitude: 26°49'02.3"S
- Longitude: 17°48'11.5"E

The site is located 37.2 km north of Windhoek and 2.46 km off the B1 road. The site is in the St Joseph's Roman Catholic High School area. It is surrounded by the Dobra sports field. The BTS is being erected to ensure that connectivity is accessed by the Dobra residents, the school and the the church facilities.

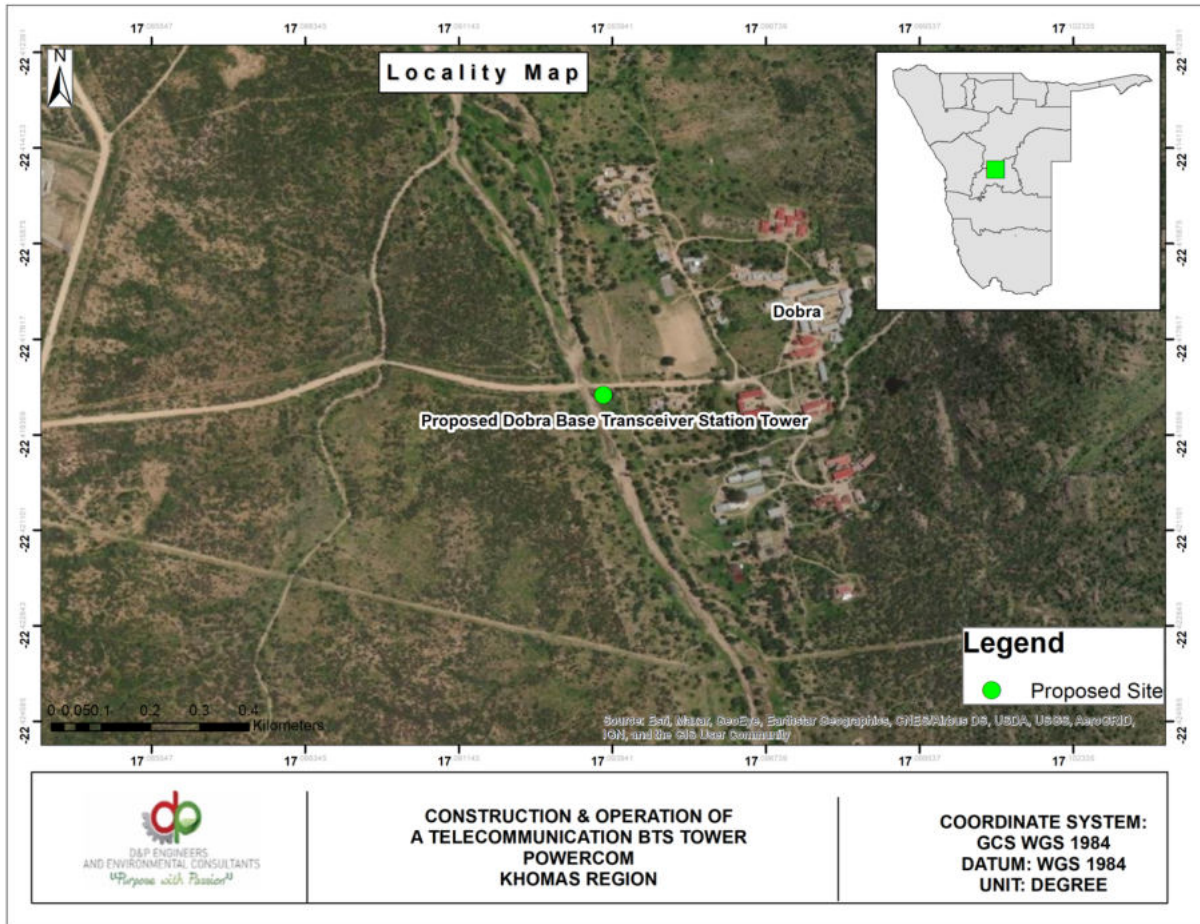


Figure 1: Site Locality

1.3. Project Overview

TELECOM Namibia's information and technology infrastructure development subsidiary, POWERCOM (Pty) Ltd is on a drive of construction network towers across the country. POWERCOM targets that, other than improving internet and voice connectivity in the regions, there is also a need to increase the company's footprint and asset base to best service ICT stakeholders and offer better connectivity in all regions of the country. POWERCOM aims at providing different telecommunication service providers in Namibia with ready-to-use infrastructure as well as expanding network coverage into the different areas where there is weak or no network connectivity at all.

Behind this backdrop, Telecom identified areas that need improved network connectivity that is currently not serviced with telecom network. The applicant, POWERCOM Pty Ltd, therefore intends to develop 22 telecommunication towers countrywide and Dobra is one of the planned sites.

1.3.2. Infrastructure and Services

Water: Water for construction will be obtained from existing water infrastructure.

Ablution: Construction ablution will be the existing Dobra toilets..

Electricity: There is an existing electricity connection on site

Communication: The proposed project will provide for communication in the area



Figure 4: Power Box with electrical infrastructure

1.4. The project Environs

The project site is located within St Joseph's Roman Catholic High School on an open area surrounded by the Dobra sports field and the employee's residential area. All affected stakeholders near the project area were notified of the development and comments were solicited.

1.5. Need and Desirability

The economic and social development goals of Namibia are embodied in (i) Vision 2030 and (ii) the National Development Plan 5 (NDP 5) 2017/2018 – 2021/2022 as well as NDPs 1, 2, 3, and 4. In addition, the Government has developed the Harambee Prosperity Plan (HPP) 2016/2017 – 2019/2020, which complements Vision 2030 and NDP 5. All of the three plans set the goals, targets, and strategy for Namibia to move on a path to economic prosperity through a concerted strategy for the development of Namibia's economic growth. These Plans also include specific growth targets, milestones, and strategies for the sustainable deployment of Namibia's resources to achieve the stated economic and social development

goals. Communication is one of the major targets aimed in the NDP5 and to stimulate the development of any aspect, internet and voice connectivity is a prerequisite.

This project is a major step in addressing the objectives of the developmental plans and targets of the Namibian government and the development will ensure that there is connectivity for the Dobra community who will need to keep connected to their business and family.

1.6. Project Alternatives

1.6.1. Site Location Alternatives

An integrated site selection study was done to identify a suitable site for the proposed tower. The proposed site is considered highly desirable due to the following considerations:

- Elevation: The project location is strategic because it can allow the covering of a wider radius within the game reserve.
- Land suitability: The site is easily accessible by road and near an electrical connection to power the tower components.

It is thus, the consideration of the above criteria resulted in the selection of the preferred site. No further site location alternatives are considered in the EIA process.

1.6.2. Tower Infrastructure Alternatives

There are several types of telecommunication towers design and forms. In this respect, to cater for a 20-40m height to make sure network connectivity in Dobra is good and does not overshoot, the proponent will invest in a Lattice tower.

1.6.3. Conclusion

Based on the preceding alternative analysis and options, the project will go ahead and will ensure maximum environmental and safety performance systems are in place

2. CHAPTER TWO: POLICY, LEGAL AND ADMINISTRATIVE FRAMEWORK

2.1. Introduction

An important part of the EIA is identifying and reviewing the administrative, policy, and legislative frameworks concerning the proposed activity, to inform the proponent about the requirements to be fulfilled in undertaking the proposed project. This section looks at the legislative framework within which the proposed development will conform; the focus is on compliance with the legislation during the planning, construction, and operational phases. All relevant legislations, policies, and international statutes applying to the project are highlighted in the table below as specified in the Environmental Management Act, 2007 (Act No.7 of 2007) and the regulations for Environmental Impact Assessment as set out in the Schedule of Government Notice No. 30 (2012).

Table 1: Policy, Legal and Administrative Framework

LEGISLATION/POLICY/ GUIDING DOCUMENT	PROVISION	PROJECT IMPLICATION
The Constitution of the Republic of Namibia (1990)	The articles 91(c) and 95(i) commits the state to actively promote and sustain environmental welfare of the nation by formulating and institutionalizing policies to accomplish the sustainable objectives which include: <ul style="list-style-type: none"> • Guarding against overutilization of biological natural resources, • Limiting over-exploitation of non-renewable resources, • Ensuring ecosystem functionality, • Maintain biological diversity. 	Through the implementation of the environmental management plan, the proposed development will be conformant to the constitution in terms of environmental management and sustainability, by bringing development in an environmentally sensitive way.
Vision 2030 and National Development Plans	Namibia’s overall Development ambitions are articulated in the Nations Vision 2030. At the operational level, five-yearly national development plans (NDP’s) are prepared in extensive consultations led by the National Planning Commission in the Office of the President. Currently the Government has so far launched a 4th NDP which	The proposed project is an important element in the propelling and connectivity in the country.

	pursues three overarching goals for the Namibian nation: high and sustained economic growth; increased income equality; and employment creation.	
Environmental Assessment Policy of Namibia 1994	The Environmental Assessment Policy of Namibia requires that all projects, policies, Programmes, and plans that have detrimental effect on the environment must be accompanied by an EIA. The policy provides a definition to the term “Environment” broadly interpreted to include biophysical, social, economic, cultural, historical and political components and provides reference to the inclusion of alternatives in all projects, policies, programmes and plans.	The construction and operation of the tower will only commence after being awarded an environmental clearance certificate, thus by abiding to the requirements of the Environmental Assessment Policy of Namibia. The EIA and EMP will cater for the sustainable management of biophysical environment.
Environmental Management Act No. 07 of 2007	The Act aims at <ul style="list-style-type: none"> • Promoting the sustainable management of the environment and the use of natural resources by establishing principles for decision-making on matters affecting the environment; • To provide for a process of assessment and control of projects which may have significant effects on the environment; • The Act gives legislative effect to the Environmental Impact Assessment Policy. Moreover, the act also provides procedure for adequate public participation during the environmental assessment process. 	This document is compiled in a nature that project implementation is in line with the objectives of the EMA. EIA guiding procedures developed by MEFT were also used in the course of this project.
Electricity Act 4 of 2007	<ul style="list-style-type: none"> • Requires that any generation and or distribution complies with laws relating to health, safety and environmental standards (s 18(4)(b)) • In the event that exemption from acquiring a license is 	Obliges Powercom to comply with all relevant provisions of the EMA and its regulations when installing electrical connections to the tower.

	granted, the Minister may impose conditions relating to public health safety or the protection of the environment.	
The Atomic Energy and Radiation Protection Act, Act 5 of 2005:	Provides for the adequate protection of the environment and of people against the harmful effects of radiation by controlling and regulating the production, processing, handling, use, holding, storage, transport and disposal of radiation sources and radioactive materials, and controlling and regulating prescribed non-ionising radiation sources according to the standards set out by the ICNIRP.	Cell phone towers and other antenna installations are usually located on rooftops, towers, and utility poles. Cell phone towers operate at a higher power than cell phones but the radiofrequency EMF they emit is much further away from your body. This means your exposure from such antennas is usually much lower than the exposure level from using a cell phone. Installation of the network transmitter will be done in accordance with the safety protocols required for non-ionizing radiation protection.
Hazardous Substances Ordinance 14 of 1974 Regulations Made In Terms Of Hazardous Substances Ordinance 14 of 1974 sections 3 and 27	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.	Powercom will have to conform to this Act and its regulations through application for relevant licenses with the relevant bodies highlighted thereto.
“Guidelines for Limiting Exposure to Time-Varying Electric, Magnetic, and Electromagnetic Fields (up to 300GHz)” (April 1998 developed by the International Commission on Non-Ionizing Radiation	Provides international standards and guidelines for limiting the adverse effects of non-ionising radiation on human health and well-being, and, where appropriate, provides scientifically based advice on non-ionising radiation protection including the provision of guidelines on limiting exposure.	Cell phone towers and other antenna installations are usually located on rooftops, towers, and utility poles. Cell phone towers operate at a higher power than cell phones but the radiofrequency EMF they emit is much further away from your body. This means your exposure from such antennas is usually much lower than the exposure level from using a cell phone.

Protection (ICNIRP))		
Soil Conservation Act 76 of 1969	<p>The objectives of this Act are to:</p> <ul style="list-style-type: none"> • Make provisions for the combating and prevention of soil erosion, • Promote the conservation, protection and improvement of the soil, vegetation, sources and resources of the Republic. 	<p>The project will have a rather localized impact on soils and the soil through clearance for the tower platform. Soil protection measures will be employed and preservation of trees as much as possible.</p>
Protected Areas and Wildlife Management Bill	<p>This bill, when it comes into force, will replace the Nature Conservation Ordinance 4 of 1975. The bill recognizes that biological diversity must be maintained, and where necessary, rehabilitated and that essential ecological processes and life support systems be maintained. It protects all indigenous species and control the exploitation of all plants and wildlife.</p>	<p>Environmental recommendations and considerations on this project have ensured that the proposed activities will not fall within the boundaries of any protected area and that the project will not affect heavily endangered vegetation and animals on its site.</p>
Forest Act, 2001 (Act No. 12 of 2001)	<p>The Act gives provision for the protection of various plant species through the Ministry of Agriculture, Water and Forestry (MAWF), Directorate of Forestry).</p>	<p>The site has a few palm trees which will not be removed to pave way for development.</p>
National Rangeland Policy and Strategy, 2012	<p>The policy aims at enabling resource users (farmers and managers) to manage their rangeland resources in a sustainable manner and sustainable in that they are economically viable, socially acceptable, environmentally friendly and politically conducive.</p>	<p>This proposed project will ensure that the local community benefits both economically and socially from the project, this in line with the recently declared Harambee Prosperity Plan and NDP 4&5.</p>
National Biodiversity Strategy and Action Plan (NBSAP2)	<p>The action plan was operationalised in a bid to make aware the critical importance of biodiversity conservation in Namibia putting together management of matters to do with ecosystems protection, biosafety, biosystematics protection on both terrestrial and aquatic systems.</p>	<p>The project proponent has been advised by DPEE and recognises the need for ecosystem protection to manage the changing climatic environment.</p> <p>This project is one of the drivers to reduce the rate of global environmental change given its contribution, to decreased use of burning fossil fuels for energy generation.</p>
Wetland Policy, 2004	<p>The policy provides a platform for the conservation and wise use of wetlands, thus promoting inter-generational equity regarding wetland</p>	<p>In compliance to this Policy, the development will ensure a standard environmental planning such that it does not affect any wetlands within its locale through recognition of wetlands to promote</p>

	resource utilization. Furthermore, it facilitates the Nation’s efforts to meet its commitments as a signatory to the International Convention on Wetlands (Ramsar) and other Multinational Environmental Agreements (MEA’s).	the conservation and wise utilization of wetlands resources. There is an existing water channel within 500m radius of the proposed project site.
Water Resources Management Act, 2013 (Act No. 11 of 2013)	This Act provides for the management, protection, development, use and conservation of water resources. This also forms the regulation and monitoring of water resources.	The proposed development will get water from the existing water infrastructure.
National Heritage Act 27 of 2004	Heritage resources to be conserved in development.	During the project implementation as soon as objects of cultural and heritage interests are observed such as graves, artefacts and any other object believed to be order than 50 years, all measures will be taken protect these objects until the National Heritage Council of Namibia have been informed, and approval to proceed with the operations granted accordingly by the Council.
National Monuments Act of Namibia (No. 28 of 1969) as amended until 1979	“No person shall destroy, damage, excavate, alter, remove from its original site or export from Namibia: (a) any meteorite or fossil; or (b) any drawing or painting on stone or a petroglyph known or commonly believed to have been executed by any people who inhabited or visited Namibia before the year 1900 AD; or (c) any implement, ornament or structure known or commonly believed to have been used as a mace, used or erected by people referred to in paragraph (b); or (d) the anthropological or archaeological contents of graves, caves, rock shelters, middens, shell mounds or other sites used by such people; or (e) any other archaeological or palaeontological finds, material or object; except under the authority of and in accordance with a permit issued under this section.	The proposed site of development is not within any known monument site both movable or immovable as specified in the Act, however in such an instance that any material or sites or archeologic importance are identified, it will be the responsibility of the developer to take the required route and notify the relevant commission.

<p>Pollution Control and Waste Management Bill</p>	<p>This bill has not come into force. Amongst others, the bill aims to “prevent and regulate the discharge of pollutants to the air, water and land” Of particular reference to the Project is: Section 21 “(1) Subject to sub-section (4) and section 22, no person shall cause or permit the discharge of pollutants or waste into any water or watercourse.”</p> <p>Section 55 “(1) No person may produce, collect, transport, sort, recover, treat, store, dispose of or otherwise manage waste in a manner that results in or creates a significant risk of harm to human health or the environment.”</p>	<p>To control air, water and land pollution as agitated by the Act the project proponent will ensure that the development will prevent pollution in all forms during construction and operation phases.</p>
<p>Communications Act, 2009 (Act No. 8 of 2009)</p>	<ul style="list-style-type: none"> • (10) The Authority may impose specific obligations and requirements on a licensee regarding to masts, towers or other facilities including requirements relating to the • environmental or aesthetic impact of such facilities; 	<p>As a pre requisite, telecommunication towers would require environmental clearance certificates and, in this respect, Powercom authorised this EIA to obtain such.</p>
<p>Communication Bill 2009</p>	<ul style="list-style-type: none"> • Provide for the regulation of telecommunication activities. The bill provides licencing and enforcement of conditions, and the approval or equipment and technical standards to ensure public health and safety. 	<p>As per relevant spectrum, network equipment should be as per licenses.</p>
<p>Convention on Biological Diversity (CBD)</p>	<ul style="list-style-type: none"> • Namibia is a signatory of the Convention on Biological Diversity and thus is obliged to conserve its biodiversity. 	<p>The project will preserve tree species on as part of their plans for greed and sustainable development.</p>
<p>United Nations Convection to combat Desertification</p>	<p>Namibia is bound to prevent excessive land degradation that may threaten livelihoods.</p>	<p>It will be the responsibility of the proponent to conserve vegetation on and around the area, to avoid encroachment of the desert environs in the area.</p>

3. CHAPTER THREE: RECEIVING ENVIRONMENT

3.1. Introduction

In this chapter, the findings of the EIA Team on baseline surveys, public consultation, and desk reviews are undertaken with respect to the ecology, society, economy, and geo-political setup of the proposed project area. The geological makeup and meteorology of the project site will also be discussed in this chapter to give an in-depth understanding of the project area in question.

3.1.1. Socio-Economic status

Döbra is a settlement about 25 kilometers (16 mi) north of the capital, Windhoek. There is also a mountain with the same name which is 2023m above sea level. It is located near the Kürsteneck in the Eros Mountains and around 6 kilometers (3.7 mi) west of Otjihase mine. Döbra houses a mission station of the Catholic Church in Namibia, part of the Archdiocese of Windhoek. The mission station ran a teacher training center, St Joseph's Teacher Training Centre since 1924, and a school, St Joseph's Roman Catholic High School where the tower was constructed. The land around is characterized by a savanna biome. There are industrial business areas, residential areas, and farms which are distributed far apart from each other.

The construction impacts will be minimum if mitigated by the Environmental Management Plan.



Figure 5: St Joseph's Roman Catholic High School

3.2. Climate

The proposed area is found in the central highland with the capital Windhoek in its center. Due to its altitude of 1700 meters on average, this highland has moderate temperatures and average rainfalls. The average day temperatures lie at 30° C in January to 20° C in July and between 17° C in January and 7° C in June at night. During winter overnight frost can occur. Usually, no rainfall occurs between June and September. The annual precipitation average of the last 20 years is 370 mm. Of this 296 mm of rain was received from January until May, 5.2 mm from June to September, and 76 mm from October to December. The area is prone to flooding if high rainfall is received.

3.3. Fauna

Fauna varies depending on the type of vegetation, climate, and topography. The Khomas area consists of the following fauna:

- **Mammals:** At least 75 species of mammals are expected to occur in the landscape. Of the mammals, 6 species (8%) are endemic to Namibia. Mammals include shrews (2 species), hedgehog, elephant shrews (3), bats (13), bushbaby, baboon and pangolin, hares/rabbits (3), molerat, squirrels (2), porcupine, springhare and dassie rat, rats and mice (17), carnivores (17), aardvark, rock dassie, warthog, antelopes (7).
- **Reptiles:** At least 78 species of reptiles are expected to occur, comprising at least 36 snakes (3 blind snakes, 1 thread snake, 2 pythons, 5 burrowing snakes, and 25 typical snakes), of which 8 are endemic to Namibia, 2 tortoises and 1 terrapin and 34 lizards, with 13 of these being endemic to Namibia.
- **Amphibians:** Roughly 13 species of amphibians are expected to occur. These include 3 species of toads, 2 rubber frogs, 2 puddle frogs, and 1 each bullfrog, sand frog, kassina, rain frog, cacos and platanna. Three species are endemic.
- **Arthropods:** Arthropods are invertebrates with an exoskeleton, segmented body, and jointed limbs. They include insects, arachnids, and crustaceans and are vital components in the cycling of nutrients through ecosystems. A diverse arthropod fauna occurs with many species which are specially adapted to the particular environmental conditions in the area. Many species are considered threatened by habitat degradation, and the impacts of agriculture, alien species, and pollution.

However, most of these species are not present on the specific site as the project site is showing evidence of human inference, such as the infrastructures and human presence. However, there are grasses on the site and acacia trees in the surrounding, therefore the removal of any remaining vegetation outside the site should however still be done in a properly managed, planned, and responsible manner to avoid habitat destruction of the fauna. The rehabilitation of disturbed areas is important and should be done in accordance with the Environmental Management Plan (EMP).

3.4. Avifauna

Dobra sits on the Khomas Highland plateau which is rich in avifauna, close to an ephemeral water channel which is an important habitat for birds. The Khomas area consists of over 300 species,

many of them near-endemics of Namibia. The type of birds found in this area are Rüppell's parrot, Monteiro's hornbill, rockrunner, and white-tailed shrike. Other species include blackfaced waxbill, short-toed rockthrush, whitebacked mousebird, Cape penduline tit, ashy tit, shaft-tailed whydah, and cinnamon breasted bunting Orange River Francolin, Rockrunner, Monteiro's Hornbill, Black-throated Canary, Capped Wheatear, Desert Cisticola, Ant-eating Chat, Ashy Tit, Shaft-tailed Whydah, Acacia Pied Barbet, Rock Kestrel, and many others.

It is imperative to understand that, despite these trends, the specific project site (area cover) consists of no trees, only grasses but there are acacia trees in the surrounding consisting of bird nests (see fig 6). Therefore disturbance should be minimized on these trees; hence the project will have minimal impacts on the bird's environment.



Figure 6: Bird nest on Acacia tree

3.5. Flora

The landscape supports tree and shrub savanna of moderate to high species diversity. Much of the area is *Acacia hereroensis* savanna, with open to semi-open, short bushland with mesic (i.e. typical of moderately moist areas) grassland species, such as *Brachiaria serrata*, *Themeda triandra*. This vegetation type supports a very high diversity of species but is prone to encroachment by *Dichrostachys cinerea* (Kalahari Christmas tree, sickle bush). The vegetation varies on the slopes and ridges to the river beds/streams. Taller acacia trees are quite abundant, specifically in areas associated with rivers.

Acacia mellifera dominates undulating lands; other dominant species are A. hebeclada subsp. hebeclada, Catophractes alexandri (trumpet thorn). Grass species include the common species Stipagrostis uniplumis, Eragrostis nindensis, Microchloa caffra and Monelytrum luederitzianum. A conspicuous part of this vegetation type is the dwarfshrub species Leucosphaera bainsii (wolbos), Ericcephalus luederitzianus (kappokbos) and others. The original grass cover was characterised by climax grasses such as Anthephora pubescens, Brachiaria nigropedata and Digitaria eriantha, amongst others, however, these valuable species have decreased due to poor farming practices such as overgrazing or injudicious selective grazing. Euclea undulata dominates the woody vegetation while an endemic aloe of the Khomas Hochland, Aloe viridiflora, is found in some areas.

However, most of these species are not present on the specific site as the surrounding area has been cleared or degraded due to existing infrastructure and human activity. Only a small amount of plants/vegetation will be removed for construction and operational phases as the site area is dominated by grass and little shrubs, with tree species in the surroundings such as Acacia Mellifera. The removal of any vegetation especially in the surrounding area should still be done in a properly managed, planned and responsible manner to avoid the destruction of unnecessary ground cover or protected species. The rehabilitation of disturbed areas is important and should be done in accordance with the Environmental Management Plan (EMP) hence the project will have minimal impacts on the environment



Figure :Project site



Figure 7: Existing land uses- soccer field.

3.6. Hydrology

The project area is not sited within a significant surface water zone nor will it disturb the nearby surface water source. In proximity to the project site, 120 m South of the site, lies a water channel. The water channel is at a much lower altitude than the tower site. During the construction phase, it is important to ensure that pollution prevention to prevent runoff pollutants to be washed into the water channel is strictly implemented. Construction is also recommended not to be conducted during the rainy season.

The proposed project will have little or no significant impact on general area hydrological drainage, and thus, the project will have a relatively low impact on surface water hydrology.

3.7. Pedology & Geology

The Khomas Highlands was created around 650 million years ago. The Khomas subgroup is the youngest of the Damara Sequence and consists of metamorphic rocks like mica schist, traversed by micaceous quartzite, subordinate calcareous schist and impure marble, and amphibole schist. The schists form a group of medium-grade metamorphic rocks, chiefly notable for the preponderance of lamellar minerals such as mica, chlorite, talc, hornblende, graphite, and others. Quartz often occurs in drawn-out grains to such an extent that a particular form called quartz schist is produced. By definition, schist contains more than 50% platy and elongated minerals, often finely interleaved with quartz and feldspar.

The proposed projects will likely cause temporary localised soil disturbances during construction.

3.8. Topography

The greater area of the project site is flat, however, the project is sited close to a water channel which is a floodplain. Pollution prevention and stormwater control should be implemented.

4. CHAPTER FOUR: PUBLIC CONSULTATION

Public and Stakeholder involvement is a key component of the EA process. The public consultation process, as set out in Section 21 of Regulation No 30 of EMA, has been followed during this assessment, and the details thereof are documented below.

4.1. Printed Media

4.1.1. Background Information Document

A Background Information Document (BID) was drafted at the onset of the EA process to act as a useful information handout about the proposed project development. In addition, the BID provided details on the public consultation process with contact details for further information. This document was advertised for availability through various means of newspaper articles, Public meetings, and electronic mail; see Appendix B of this document

4.1.2. Newspaper Advertisements & Articles

Newspaper notices about the proposed project and related Environmental Assessment processes were circulated in two newspapers for two weeks. These notices appeared in the “Confidante” and “New Era” newspapers, shown in Appendix B.

4.1.3. Site Notices

A site notice was placed at the project site, and Notice board a St Joseph's Roman Catholic High School. These provided information about the project and related EA while providing contact details of the project team.



Figure 8: Site Notice

4.1.4. Building a Stakeholder Database

A stakeholder database for the project was collected through a variety of means. During the advertisement of the project (through public notices in local newspapers and site notices) the list was augmented as Interested & Affected Parties (I&AP) registered and the contact information of stakeholders was updated, Please refer to Appendix B.

4.1.5. Stakeholder Meetings & Key Conversations

A public meeting was scheduled on Tuesday, 13 September 2022 at Dobra, and the meeting was well attended by all stakeholders. Appendix b has a detailed list of the attendance register. The consultant administered questionnaires during the meeting to all members who attended the meeting



Figure 9: Community engagement meeting conducted

4.1.6. Comments and review period

From the onset of the public consultation process and the initial information sharing through the BID, newspaper, and site notices, various stakeholders have registered and provided comments. All of the immediate neighbors are in support of the initiative. The Scoping Report and Environmental Management Plan were made available to the public and stakeholders for comment and review. Questionnaires and proof of stakeholder engagement are attached in appendix B of this EAR.

5. CHAPTER FIVE: ENVIRONMENTAL AND SOCIO-ECONOMIC IMPACTS

5.1. Overview

POWERCOM has committed to sustainability and environmental compliance by coming up with a corrective action plan for all anticipated environmental impacts associated with the project. This is also in line with the Namibian Environmental Management legislation and International best practices on telecommunication infrastructure. The proponent will implement an Environmental Management Plan (EMP) in order to prevent, minimize and mitigate negative impacts. The environmental management plan is being developed to address all the identified expected impacts, the plan will be monitored and updated continuously with the aim of continuous improvement to address impacts.

5.2. Assessment Of Impacts

This section sets out the overall approach that was adopted to assess the potential environmental and social impacts associated with the project. To fully understand the significance of each of the potential impacts each impact must be evaluated and assessed. The definitions and explanations for each criterion are set out below in Table 2: Assessment Criteria and

Table 2: Impacts Assessment Criteria

Duration – What is the length of the negative impact?	
None	No Effect
Short	Less than one year
Moderate	One to ten years
Permanent	Irreversible
Magnitude – What is the effect on the resource within the study area?	
None	No Effect
Small	Affecting less than 1% of the resource
Moderate	Affecting 1-10% of the resource
Great	Affecting greater than 10% of the resource
Spatial Extent – what is the scale of the impact in terms of area, considering cumulative impacts and international importance?	
Local	In the immediate area of the impact
Regional / National	Having large scale impacts
International	Having international importance
Type – What is the impact	
Direct	Caused by the project and occur simultaneously with project activities
Indirect	Associated with the project and may occur at a later time or wider area

Duration – What is the length of the negative impact?	
Cumulative	Combined effects of the project with other existing / planned activities
Probability	
Low	<25%
Medium	25-75%
High	>75%

(Adopted from ECC-Namiba, 2017)

Table 3: Impacts Significance

Class	Significance	Descriptions
1	Major Impact	Impacts are expected to be permanent and non- reversible on a national scale and/or have international significance or result in a legislative non- compliance.
2	Moderate Impact	Impacts are long term, but reversible and/or have regional significance.
3	Minor	Impacts are considered short term, reversible and/or localized in extent.
4	Insignificant	No impact is expected.
5	Unknown	There are insufficient data on which to assess significance.
6	Positive	Impacts are beneficial

(Adopted from ECC-Namiba, 2017)

Table 4: Environmental Impacts and Aspects Assessment

Environmental Impact	Valued Ecosystem Component	Impact	Project Phase	Duration	Magnitude	Extent	Type	Probability	Significance	Infrastructure/ Activity
TOPOGRAPHY	Landscape Scenery	Visual aesthetic impact	Construction and Operation	Moderate	Moderate	Local	Direct	Medium 25 - 75%	Minor	Tower construction
SOIL	Soil	Contamination to soil from paints and other potentially hazardous substances	Construction and Operations	Moderate	Small	Local	Direct	Low <25%	Minor	Tower
	Soil	Spillages of fuel, oil and lubricants.	Construction	Short	Small	Local	Direct	Low <25%	Minor	Tower and Access Road construction
	Soil	Erosion	Construction	Moderate	Small	Local	Direct	Low <25%	Minor	Tower and Access Road construction
LAND CAPABILITY	Terrestrial ecology	Change in land use	Construction and Operations	Permanent	Great	Local	Direct	Low <25%	Moderate	Tower
	Carrying capacity	Increase in human activities in the environment	Construction and Operations	Moderate	Moderate	Regional	Direct	Low <25%	Minor	Tower
WATER	Surface water quality	Water pollution from oils, lubricants and chemicals spillages.	Construction and Operations	Moderate	Small	Local	Direct	Medium 25 - 75%	Moderate	Construction hydrocarbons
	Surface water quality	Turbidity and high sediment load	Construction	Moderate	Small	Local	Direct	Low <25%	Moderate	Construction hydrocarbons
AIR QUALITY	Air Quality	Construction phase dust	Construction	Short	Small	Local	Direct	Low <25%	Minor	Tower and Access Road construction
WASTE	Groundwater quality	Hazardous waste such as waste lubricants and stored chemicals may be release into the environment.	Construction and Operations	Short	Small	Local	Direct	Low <25%	Minor	Tower and Access Road construction
	Surface water quality	Threatened from chemicals being washed into nearby rivers	Construction and operations	Moderate	Moderate	Regional	Direct	Medium 25 - 75%	Moderate	Tower and Access Road construction
	Surface water quality	Construction and Operational solid waste	Construction and operations	Moderate	Moderate	Regional	Direct	Medium 25 - 75%	Moderate	Tower and Access Road construction and maintenance

Environmental Impact	Valued Ecosystem Component	Impact	Project Phase	Duration	Magnitude	Extent	Type	Probability	Significance	Infrastructure/ Activity
FAUNA	Terrestrial ecology and biodiversity	Loss of habitat and driving away of local animals	Construction and Operations	Short	Small	Local	Direct	Low <25%	Minor	Tower and Access Road construction
	Terrestrial ecology and biodiversity	Destruction of vertebrate fauna (e.g. road kills; fence and powerline mortalities)	Construction and Operations	Short	Small	Local	Direct	Low <25%	Minor	Tower and Access Road
SOCIAL	Noise Pollution	Increased noise levels	Construction	Moderate	Small	Local	Direct	Low <25%	Minor	Tower and Access Road
	Socio Economic Activities	Temporary and permanent employment prospects.	Construction and operations	Long	Moderate	Regional	Direct	Medium 25 – 75%	Positive	Tower and Access Road
	Socio Economic Activities	Climate change impacts	Operations	Long	Moderate	Regional / National	Direct	High >75%	Positive	Tower and Access Road
	Contribution to National Economy	Employment, local procurement, duties and taxes.	Construction and Operations	Short	None	Regional / National	Direct	Low <25%	Positive	Tower and Access Road
HERITAGE	Artefacts, archaeological high value components	Destruction or affecting paleontological and archaeological artefacts	Construction and Operation	Moderate	Small	Local	Direct	Low <25%	Minor	Tower and Access Road
HEALTH AND SAFETY	Health Sanitation	Poor ablution and waste management facilities may be detrimental to human health.	Construction	Moderate	Moderate	Local	Direct	Medium 25 – 75%	Moderate	Tower and Access Road
	Property and human life	Electrocution, fires resulting in fatalities, damage to properties, veldt fires and power surges.	Construction and Operation	Moderate	Great	Local	Direct	Medium 25 – 75%	Major	Warehouse
	Natural Environment	Spillage/ release of chemicals into the environment	Operation	Moderate	Great	Local	Direct	Medium 25 – 75%	Major	Tower and Access Road
	Humans, Vegetation, Animals	Potential impacts from non-ionizing radiation propagated by masts.	Operation	Moderate	Small	Local	Direct	Low <25%	Minor	Tower

Environmental Impact	Valued Ecosystem Component	Impact	Project Phase	Duration	Magnitude	Extent	Type	Probability	Significance	Infrastructure/ Activity
AVIAN IMPACTS	Air traffic	Air Traffic disturbances	Operation	Moderate	Great	Local	Direct	Medium 25 – 75%	Major	Tower
	Avifauna	Bird fatalities	Operation	Moderate	Moderate	Local	Direct	Medium 25 – 75%	Moderate	Tower
TRAFFIC	Access road	Vehicular accidents	Construction and Operation	Moderate	Great	Local	Direct	Medium 25 – 75%	Major	Tower

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Environmental Management Plan (EMP)

Appendices