

ENVIRONMENTAL IMPACT ASSESSMENT FOR THE PROPOSED CONSTRUCTION AND OPERATION OF THE NARRAVILLE TELECOMMUNICATION LATTICE TOWER IN WALVIS BAY, ERONGO REGION-NAMIBIA.



ENVIRONMENTAL SCOPING REPORT FINAL

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Acronyms

TERMS	DEFINITION
BID	Background Information Document
EAP	Environmental Assessment Practitioners
ECC	Environmental Clearance Certificate
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
ESIA	Environmental and Social Impact Assessment
EMP	Environmental Management Plan
GHG	Greenhouse Gasses
ISO	International Organization for Standardization
I&Aps	Interested and Affected Parties
JBIC	Junior Baiano Industrial Consultants
MET: DEA	Ministry of Environment and Tourism's Directorate of Environmental Affairs

EXECUTIVE SUMMARY

Junior Baiano Industrial Consultants (JBIC) cc has been engaged by **Powercom (PTY) LTD** to conduct an Environmental Impact Assessment (EIA) and develop an Environmental Management Plan (EMP) for the Construction and Operation of a Telecommunication Lattice Tower in Narraville Suburb, Walvis Bay -Namibia and to apply for an Environmental Clearance Certificate for the proposed project.

The proposed tower construction and operation has the requirement for application of an environmental clearance certificate as the activity is listed as follows;

INFRASTRUCTURE

10.1 The construction of-

(g) communication networks including towers, telecommunication and marine telecommunication lines and cables;

Anticipated Environmental Impacts

- Low potential environmental impacts because the proposed site is already disturbed from human encroachment.
- Adding on a management plan has been developed to mitigate any anticipated possible impacts of the project to the environment.
- Relative or moderate social impact (positive)

Social Impact

The project is generally expected to improve telecommunication connectivity in Narraville suburb which is currently experiencing network challenges. Interested and Affected Parties were notified of the project through Site notices and newspaper adverts and all relevant information on consultation is covered in Chapter 4 of this document and Appendix A of the document.

Recommendations

It is concluded that most of the impacts identified during this Environmental Assessment can be addressed through the recommended mitigation and management actions for both the construction and operation phases of the tower. An Environmental Management Plan has been developed for the development.

Should the recommendations included in this report and the EMP be implemented the significance of the impacts can be reduced to reasonably acceptable standards and durations. All developments could proceed, provided that general mitigation measures as set out are implemented as a minimum.

It is therefore recommended that the proposed telecommunication lattice tower receive Environmental Clearance, provided that the recommendations described above and the EMP are implemented.

1. CHAPTER ONE: BACKGROUND

1.1. INTRODUCTION

Powercom (PTY) LTD herein referred to as the proponent has identified different areas in Namibia that needs improved communication alternatives due to growth in population and economic activities. To achieve the objective of improved telecommunication connectivity, Powercom intends to establish telecommunication towers across the identified different locations. One of the identified areas that needs improved voice and data connectivity through the erection of a telecommunication mast is Narraville suburb in Walvis Bay, Erongo Region-Namibia.

In terms of the Namibian environmental legislation (Environmental Management Act (No. 7 of 2007)) and the Environmental Assessment Regulations of 2012; an EIA is required to obtain an Environmental Clearance Certificate from the Ministry of Environment and Tourism (MET) before the project can proceed.

Furthermore, as per the requirements of the Environmental Management Act No. 7 of 2007, Powercom has appointed JBIC to conduct an Environmental Assessment (EA) and develop an Environmental Management Plan (EMP) for the proposed tower establishment. This has been followed by an application for Environmental Clearance Certificate (ECC) to the Ministry of Environment and Tourism (MET): Directorate of Environmental Affairs (DEA).

In this respect, this document forms part of the application to be made to the DEA's office for an Environmental Clearance certificate for the proposed telecommunication lattice tower at Narraville, in accordance with the guidelines and statutes of the Environmental Management Act No.7 of 2007 and the environmental impacts regulations (GN 30 in GG 4878 of 6 February 2012)

1.2. PROJECT LOCATION

The project site is located in Narraville, adjacent to the Narraville Rugby Sports field, Walvis Bay-Namibia. The Locality Map Fig 1) gives a local layout view of the project site:

ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED CONSTRUCTION AND OPERATION OF THE NARRAVILLE TELECOMMUNICATION LATTICE TOWER IN WALVIS BAY, ERONGO REGION-NAMIBIA

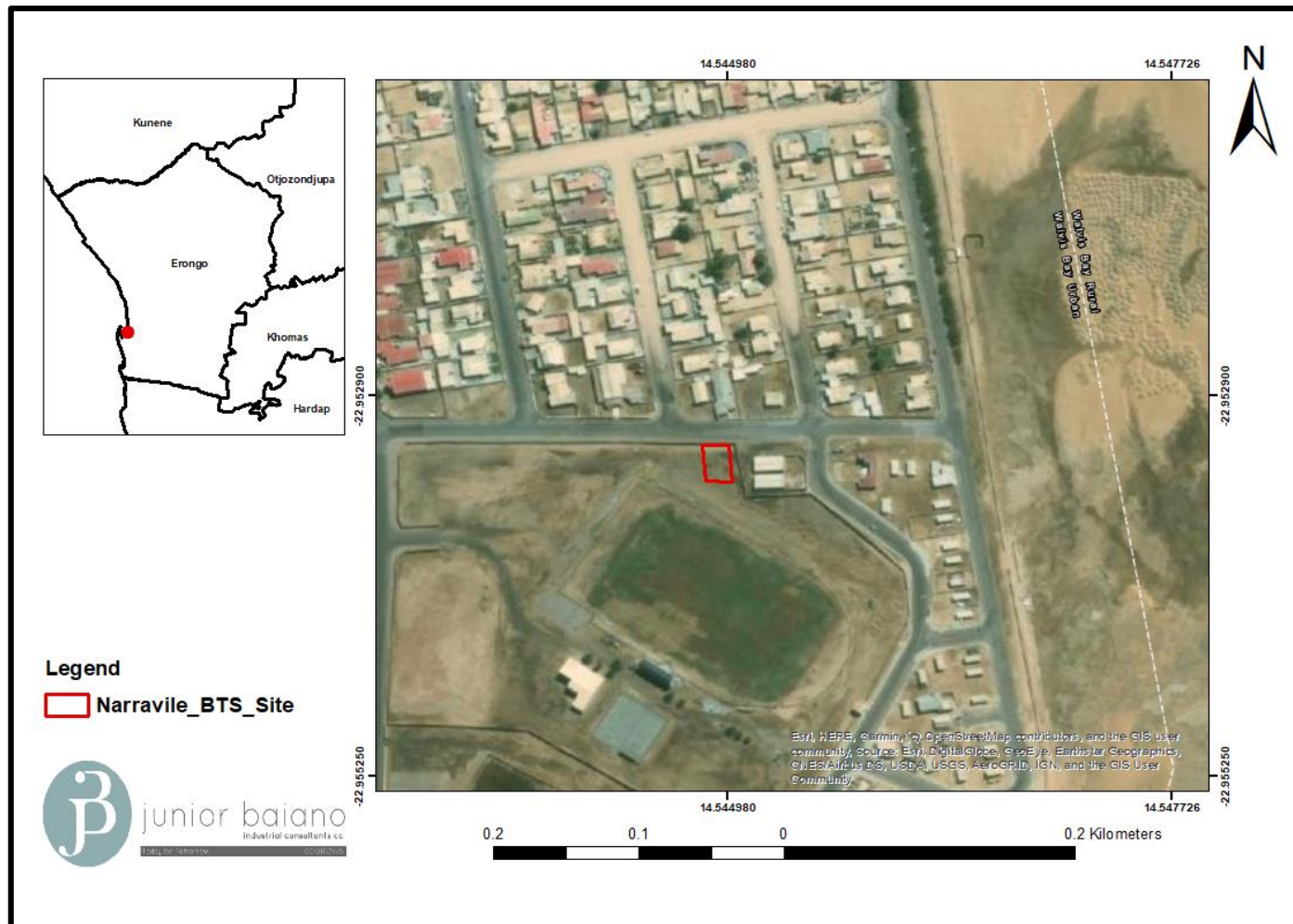


Figure 1: Proposed Project Site

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 expand TN Mobile's network coverage into the different areas where there is weak or no network connectivity at all.

Behind this backdrop, the applicant, Powercom Pty Ltd intends to install a telecommunication tower in Narraville suburb. The development will include the following:

- The construction of a 30m Palm tree tower within the footprint size of a 20m x 20m
- A storage and communication structure for equipment

The structure will be fenced to limit public access to it. The base station will be a secured building and sufficient precaution will be made to prevent access to the antenna support structure. Access to the area will be strictly controlled through a locked gate.

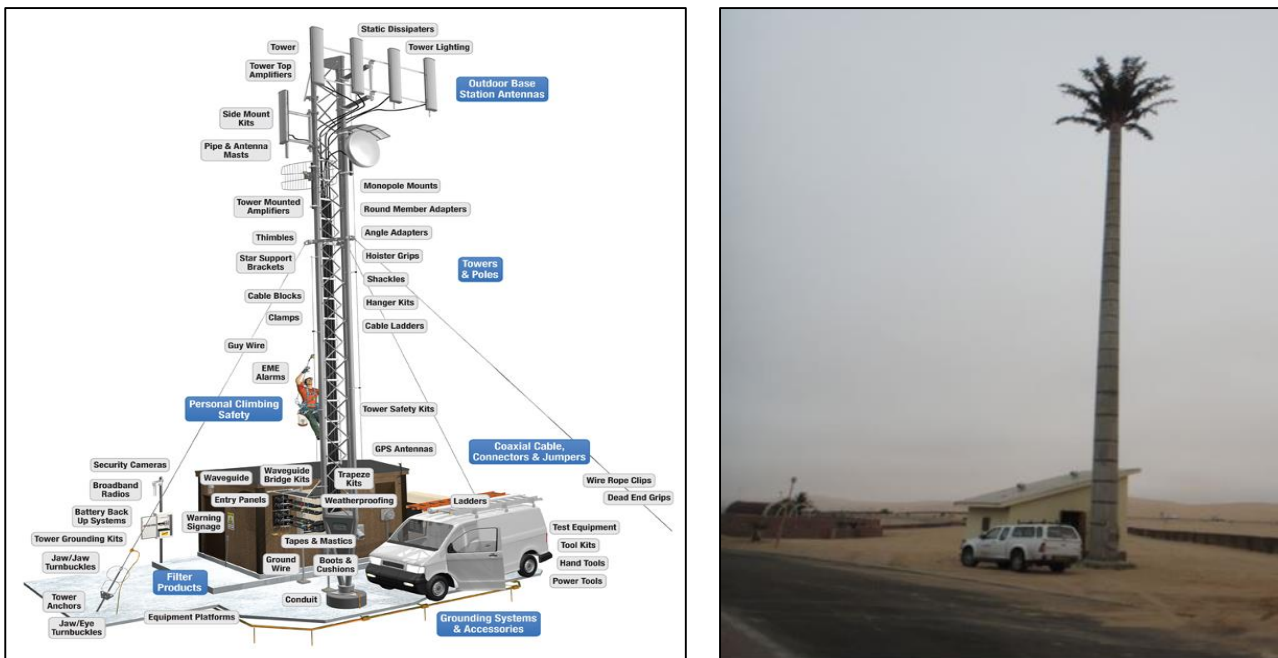


Figure 2: Typical Telecommunication tower (Left) Proposed tower (right).

Accessibility

The site is easily accessible from an existing access road connecting to the Narraville rugby field.

Infrastructure and Services

Water: There is already existing water supply from Walvis Bay Municipality to cater for all construction requirements

Ablution: During construction, employees will use temporary ablution facilities that will be emptied at Walvis Bay municipality sewerage disposal facility, and during operation there is no need for on-site ablution.

1.4. THE PROJECT ENVIRONS

The project site is located near a rugby sports field to the southern end and the rest of the surrounding environs has residential homesteads, which have since been notified of the proposed development.

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 the 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 development of any aspect, internet and voice connectivity is a pre-requisite. This project, is a major step in addressing the objectives of the developmental plans and targets of the Namibian government.

1.6. PROJECT ALTERNATIVES

1.6.1. SITE LOCATION ALTERNATIVES

An integrated site selection study was done in order 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 Narraville suburb.

- Land suitability:

-Sites that facilitate easy construction conditions (relatively flat land with few rock outcrops or water-bodies) were favoured during site selection.

-The site is easily accessible by road and near 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 designs and form. In this respect, to cater for a 30m height so as to cover further into surrounding farms and mines, the proponent will invest in a palm tree tower that also caters for green and sustainable development and minimising visual intrusion in the surrounding environs.

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 situation concerning the proposed activity, to inform the proponent about the requirements to be fulfilled in undertaking the construction and land servicing activities. This section looks at the legislative framework within which the proposed project will operate under. The focus is on the 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 Table 1: Legal Compliance 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).

The pursuit of sustainability is guided by a sound legislative framework. In this section, relevant legal instruments as well as their relevant provisions have been surveyed. An explanation is provided regarding how these provisions apply to this project.

Table 1: Legal Compliance

LEGISLATION/POLICY/GUIDING DOCUMENT	PROVISION	PROJECT IMPLICATION
The Constitution of the Republic of Namibia (1990)	<p>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:</p> <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. 	<p>-Through implementation of the environmental management plan, the proposed development will be in conformant to the constitution in terms of environmental management and sustainability, through bringing development in an environmentally sensitive way.</p>
Vision 2030 and National Development Plans	<p>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</p>	<p>-The proposed project is an important element in the propelling and connectivity in the country.</p>

	<p>Commission in the Office of the President. Currently the Government has so far launched a 4th NDP which pursues three overarching goals for the Namibian nation: high and sustained economic growth; increased income equality; and employment creation.</p>	
<p>Environmental Assessment Policy of Namibia 1994</p>	<p>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.</p>	<p>-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.</p>

<p>Environmental Management Act No. 07 of 2007</p>	<p>The Act aims at</p> <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. 	<p>-This document is compiled in a nature that project implementation is in line with the objectives of the EMA. EIA guiding procedures developed by MET were also used in the course of this project.</p>
<p>Electricity Act 4 of 2007</p>	<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 granted, the Minister may impose conditions relating to public health safety or the protection of the environment. 	<p>-Obliges Powercom to comply with all relevant provisions of the EMA and its regulations when installing electrical connections to the tower.</p>
<p>The Atomic Energy and Radiation Protection Act, Act 5 of 2005:</p>	<p>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,</p>	<p>-Justifies the need for assessing the impact of electromagnetic radiation from the power line, on the nearby residents.</p>

	<p>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.</p>	
<p>Hazardous Substances Ordinance 14 of 1974 Regulations Made In Terms Of Hazardous Substances Ordinance 14 of 1974 sections 3 and 27</p>	<ul style="list-style-type: none"> - 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. 	<ul style="list-style-type: none"> - Powercom will have to conform to this Act and its regulations through application for relevant licences with the relevant bodies highlighted thereto.
<p>“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 Protection (ICNIRP))</p>	<p>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.</p>	<p>-Justifies the need for assessing the impact of ionising and non-ionising radiation from the operation of the network technologies to be installed on site.</p>

<p>Soil Conservation Act 76 of 1969</p>	<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 on the soil through clearance for tower platform. Soil protection measures will be employed and preservation of trees as much as possible.</p>
<p>Nature Conservation Ordinance 1996</p>	<p>To consolidate and amend the laws relating to the conservation of nature; the establishment of game parks and nature reserves; the control of problem animals; and to provide for matters incidental thereto.</p>	<p>The proposed project implementation is not located in any known or demarcated conservation area, national park or unique environments. The project site was selected with this ordinance in mind to ensure that Namibian nature is conserved.</p>
<p>Protected Areas and Wildlife Management Bill</p>	<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>
<p>Forest Act, 2001 (Act No. 12 of 2001)</p>	<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>-Land clearing of an extensive piece of land will be done upon approval from the Directorate of Forestry.</p>

		<p>-The proponent will also have to ensure that there is no indiscriminate cutting down of trees during construction and operation</p> <p>-The proposed site is sparsely vegetated with white shrubs and grasses, which are not threatened or protected.</p>
National Rangeland Policy and Strategy, 2012	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.	-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.
National Biodiversity Strategy and Action Plan (NBSAP2)	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>-The project proponent has been advised by JBIC and recognises the need for ecosystems 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	The policy provides a platform for the conservation and wise use of wetlands, thus promoting inter-generational equity regarding wetland resource utilization. Furthermore, it facilitates the Nation's	-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

	efforts to meet its commitments as a signatory to the International Convention on Wetlands (Ramsar) and other Multinational Environmental Agreements (MEA's).	promote the conservation and wise utilization of wetlands resources. -There are no existing wetlands/peatlands within 5km 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 not have any interference with surface and groundwater sources during construction and operation, apart from water requirements for construction which will be supplied through Walvis Bay municipality water reticulation system
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 older than 50 years, all measures will be taken to 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	-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

	<p>executed by any people who inhabited or visited Namibia before the year 1900 AD; or</p> <p>(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</p> <p>(d) the anthropological or archaeological contents of graves, caves, rock shelters, middens, shell mounds or other sites used by such people; or</p> <p>(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.</p>	<p>the responsibility of the developer to take the required route and notify the relevant commission.</p>
<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</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>

	or creates a significant risk of harm to human health or the environment.”	
Communications Act, 2009 (Act No. 8 of 2009)	<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; 	-As a pre requisite, telecommunication towers would require environmental clearance certificates and, in this respect, Powercom authorised this EIA to obtain such.
Communication Bill 2009	<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. 	-As per relevant spectrum, network equipment should be as per licenses.
Convention on Biological Diversity (CBD)	<ul style="list-style-type: none"> - Namibia is a signatory of the Convention on Biological Diversity and thus is obliged to conserve its biodiversity. 	The project will preserve tree species on as part of their plans for greed and sustainable development.
United Nations Convection to combat Desertification	Namibia is bound to prevent excessive land degradation that may threaten livelihoods.	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.

3. CHAPTER THREE: RECEIVING ENVIRONMENT

3.1. CLIMATE

Table 2: Climatic environment

Aspect	Description
Classification of climate	Walvis Bay features the very rare mild variation of the desert climate (BWk) according to the Köppen climate classification.
Average rainfall:	Walvis Bay is one of the driest Cities on earth, receiving an average of 14mm of rainfall annually.
Temperature	During the hottest month of the year, which is mainly December, the average maximum temperature is about 18 °C. During July which is the coldest month the average minimum temperature is 4-6 °C.
Humidity	The relative humidity throughout the whole year in Walvis Bay is well above 80%
Wind direction	Predominantly south westerly.

3.2. TOPOGRAPHY

The proposed study area is highly characterised by an undulating landscape, composed of dune forming sands of the central Namib Sand Sea, which form a narrow coastal belt between Walvis Bay and Swakopmund. On the other hand the general area also has gravel plains which are seasonally used by the damara tern as breeding areas.

3.3. PEDOLOGY & GEOLOGY

The soils of the Namib Desert are formed by various processes, both mechanical and chemical. Soils along the coastal parameters have a high concentration of salts and hydrogen sulphide, which has an influence on the fog and in return intensifies chemical processes and soil genesis. Closer to the coast, soils are more likely to be consisting of gypsum while soils further inland are characterised by concrete surfaces. (Christian, 2006). The proposed project will likely cause local soil disturbances.

Locally the Walvis Bay area is underlain mainly by biotite schists, quartzites, meta-greywackes, marbles and calc silicates of the Tinkas member of the Karibib Formation, Swakop Group of the Damara. These rocks have been intensely isoclinally folded and locally have a NNE/SSW strike. Dips are generally steep and Salem-type granites and pegmatites have intruded the area, mainly in the West. Karoo-age dolerite dykes intrude the Damara metasediments and trend parallel to the foliation.

Surficial sediments of Tertiary to Recent age have been deposited over large parts of the whole of Walvis Bay area, mainly confined to present and paleodrainage features (Ransom, 1981). The calcareous grit is found around Walvis Bay area comprise relatively of mature sediment containing clasts largely consisting of rounded to subangular quartz and feldspar grains cemented by calcium carbonate. Clasts of Damara metasediments and Karoo dolerite are rarely present. The calcareous grit is preliminarily regarded as the oldest of the surficial sedimentary succession and fills an old paleodrainage feature through which the main present-day Tumas drainage cuts (Ransom, 1981; Bortom, and Ransoh, 1980; Bortom, 1977).

The project site, however is however underlain by loamy soils from the rugby field and the soil form and structure is already disturbed by construction activities and mixing with clay soils to improve field fertility.

3.4. TERRESTRIAL ECOLOGY

3.4.1. FAUNA AND FLORA

The proposed project environment is located within Walvis Bay townlands, however in the nearby areas, the area is protected under the Dorob National Park. Important tree and shrub species in the general Walvis Bay area are the endemics (i.e. *Adenia pechuelii*, *Arthroa leubnitziae*, *Commiphora dinteri*, *C. saxicola*, *C. virgata* and *Euphorbia damarana*) as well as the species protected under the Forestry Ordinance No. 37 of 1952, Forest Act No. 72 of 1968, and Nature Conservation Ordinance No. 4 of 1975 and CITES Appendix 2. However, none of these species is occurring on and around the project site. The endemic grasses expected in the area include *Eragrostis omahekensis* (Müller 1984) and *Stipagrostis sabulicola* (Burke 2003) and none of these occurs on the project area.

Trees protected under the Forestry Act 12 of 2001 should be protected within the development of different infrastructure projects. The Kalkveld area generally demonstrates high terrestrial diversity. Plant diversity in the area is recorded to be between 300-399 species (Mendelsohn et al., 2002). Bird diversity is recorded to be between 201-230 species, mammal diversity between 91-105 species and reptile diversity between 81-85 species (Mendelsohn et al., 2002).

The flagship plant of the Namib Desert is *Welwitschia mirabilis* (Endemic and CITES Appendix II) with the core populations falling outside the formal protected areas is an important species in the general area (Burke 2003). However, *W. mirabilis* is not as common

along the coast – i.e. dune belt area – as further inland and its presence in the area would have to be confirmed during the fieldwork.

The lichen fields are difficult although some areas have been fenced off for better protection over the last few years. The overall diversity of lichens is poorly known from Namibia, especially the coastal areas and statistics on endemism is even sparser (Craven 1998). *Acanthosicyos horridus* (! Nara) is endemic to the dunes of the Namib Desert and protected under the Forest Ordinance (Burke 2003) and are important as a source of food to the Topnaar community living in the Kuiseb River area.

The project site, does not have any identified lichens, in general the proposed project does not have any noticeable effect on the general desert vegetative environment

The project site is not a threat to any local fauna because it is sited in the midst of urban buildings and infrastructure; thus, the proposed tower development is not a threat to any of the protected fauna and flora species and not any major vegetation in any way since the area is already developed and urbanised.



Figure 3: Left-Current land cover on site



Figure 4: Centre-Existing infrastructure on site



Figure 5: Right-Surrounding buildings and roads

The envisaged project site for the lattice tower is already affected by human encroachment and activities such as solid waste disposal, illegal access paths as well as general development around, such that the area is not classified pristine, nor will its development result in undesirable effects on local fauna and flora, or water bodies.

4. CHAPER FOUR: PUBLIC CONSULTATION

4.1. OVERVIEW

The public consultation process forms an important component of the Environmental Assessment process. It is defined in the EIA Regulations (2012), as a “*process in which potential interested and affected parties are given an opportunity to comment on, or raise issues relevant to, specific matters*” (S1). Section 21 of the Regulations details steps to be taken during a given public consultation process and these have been used in guiding our process.

Formal public involvement has taken place via public consultations and focal meetings, newspaper announcements to inform the public that the development is under consideration. The public consultation process has been guided by the requirements of Environmental Management Act (EMA) No. 7 of 2007 and the process has been conducted in terms of regulation 7(1) as well as in terms of the EMA Regulations of GN 30 of 6 February 2012 and the World Bank EIA standards and project ToR.

Its overriding goals have been to ensure transparency in decision making and to.

- Ensure stakeholder concerns are incorporated in project design and planning;
- Increase public awareness and understanding of the project and
- Enhance positive development initiatives through the direct involvement of affected people.

The objectives of the public participation are to build credibility through instilling integrity and of conducting the EIA, Educate the stakeholders on the process to be undertaken and opportunities for their involvement and build stakeholders by establishing an agreed framework accordingly. This requires accessible, fair, transparent and constructive participation at every stage of process. Inform stakeholders on the proposed project and associate issues, impacts and mitigation and using the most effective manner to disseminate information.

In this section of the report, the results of consultations with various classes of stakeholders are summarized. The results of consultations with other stakeholders and community members who took part in this EIA are attached as Appendices.

The consultation was facilitated through the following means:

- A Background Information Document (BID) containing the project description, the EIA process and an invitation to participate was shared with stakeholders and community members.
- Invitation to participate notices were published in the local newspapers (New Era and Confidante) as shown in Table 7 below and Appendix A of this document.
- Announcement of EIA process verbally in the common public meeting points.
- Placement of a public notice at the project site and town centre.

Table 3: Details of public notification of the EIA study

Method	Area of Distribution	Language	Date Placed
The Confidante	Country Wide	English	5 November 2020 12 November 2020
Windhoek Observer	Country Wide	English	06 November 2020 13 November 2020
Site notices	Project site	English	01 November 2020
	Walvis Bay Municipality Notice Board	English	01 November 2020
Public Meeting	Narraville Rugby Field	English,	20 November 2020 @ 14 00 HRS



Figure 6: Left-Site notice at Narraville Rugby Field

Figure 7: Centre-Site Notice at Narraville Shopping Centre

Figure 8: Right-Public consultation meeting ground truthing

✓ *Key Stakeholder Engagement Meeting*

A public meeting was organised on 20 November 2020 at Narraville Rugby field and there was a low turnout of community members. The municipality and a few neighbours attended the consultative meeting. In addition, to augment the public consultation process, all nearby households were informed of the development and offered an opportunity for commenting. Proof of public consultation is given in Appendix A of this document as well the attendance register explaining the project and the EIA study. Given below are the details of the meeting which was held:

✓ *Identification of Interested and Affected Parties (I&APs)*

The EIA team identified and consulted the following I&APs & key stakeholders for the proposed project:

- Walvis Bay Municipality,
- Community Members.

Other I&APs were allowed to register to the EIA team and compiled a database containing their names and correspondence details. The registration was accomplished over a period of 14 days.

✓ *Consultation with Stakeholders*

Experts in relevant fields, leaders of thought in environmental matters, Organs of the State, local communities have been consulted for their opinions on issues relating to the potential ecological and socio-economic impacts of the proposed project.

This provided an opportunity for stakeholders and the public at large to engage in the process and to make comments or express their concerns regarding the proposed development.

Table 4: Key findings of the public consultation process:

SUMMARY OF ISSUES	
THEME	ISSUE
Health and Safety	<ul style="list-style-type: none"> ▪ The safety of the towers in light of 5G networks causing corona virus was asked, however it was addressed that the technology proposed is not 5G

Infrastructure safety	<ul style="list-style-type: none">▪ Nearby residents were inquisitive about the safety of the structures in terms of stability during construction and operation. However, strict safety measure will be employed during construction to avoid falling objects and the structure itself will be anchored to ensure that it will not fall on people's houses.
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5. CHAPTER FIVE: ENVIRONMENTAL AND SOCIO-ECONOMIC IMPACTS

5.1. OVERVIEW

Powercom Pty Ltd has committed to sustainable and environmental compliance through 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 energy generation, transmission and linear infrastructure. The proponent will implement an Environmental Management Plan (EMP) in order to prevent, minimise 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 on a continuous basis with aim for continuous improvement to addressing 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 5: Assessment Criteria.

Table 5: 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
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 6: Impact 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 7: 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

Environmental Impact	Valued Ecosystem Component	Impact	Project Phase	Duration	Magnitude	Extent	Type	Probability	Significance	Infrastructure / Activity
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
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

Environmental Impact	Valued Ecosystem Component	Impact	Project Phase	Duration	Magnitude	Extent	Type	Probability	Significance	Infrastructure / Activity
	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

Environmental Impact	Valued Ecosystem Component	Impact	Project Phase	Duration	Magnitude	Extent	Type	Probability	Significance	Infrastructure / Activity
	Natural Environment	Spillage/ release of chemicals into the environment	Operation	Moderate	Great	Local	Direct	Medium 25 – 75%	Major	Tower and Access Road
TRAFFIC	Air traffic	Air Traffic disturbances	Operation	Moderate	Great	Local	Direct	Medium 25 – 75%	Major	Tower
	Access road	Vehicular accidents	Construction and Operation	Moderate	Great	Local	Direct	Medium 25 – 75%	Major	Tower

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