PROPOSED SUBDIVISION OF PORTION A OF ONIIPA TOWN AND TOWNLANDS NO. 1164 AND ESTABLISHMENT OF KUNTA LODGE, OSHIKOTO REGIONNAMIBIA



ENVIRONMENTAL MANAGEMENT PLAN (EMP)

Consultant:



Proponent:

Kunta Resort cc
APP-002151
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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
MEFT: DEA	Ministry of Environment, Forestry 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 Management Plan

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

The framework within which this EMP is developed includes identifying various activities, their occurrence in the construction and operation processes and the likely impacts that are associated with those activities.

It is therefore necessary to subcategorize the EMP into Construction and Operational activities. The first category of the EMP which deals with project activities identified and highlight the activities impacts and the phases they are likely to occur. In this respect, this EMP alludes on anticipated construction activities and the mitigation measures that will need to be applied to reduce the severity of the impacts the proposed lodge may have on the surrounding environment. This will also include rehabilitation measures that will need to be implemented once the construction is completed and how to continuously monitor the plant in accordance to monitoring parameters highlighted herein.

ii. EMP PRINCIPLES

The following principles have informed the compilation of this environmental management Plan:

- The environment is considered to be composed of both biophysical and social components.
- Environmental management must place people and their needs at the forefront of its concern, and serve their physical, psychological, developmental, cultural and social interests equitably.
- Development must be socially, environmentally and economically sustainable.
- Construction, in general, is a disruptive activity and all due consideration must be given to the environment, particularly the social environment, during the execution of the project to minimize the impact on the affected parties.
- Minimization of areas disturbed by construction activities will reduce the severity of the construction related environmental impacts and reduce rehabilitation requirements and costs.
- As minimum requirements, relevant standards relating to international, national, regional and local legislation, where applicable, shall be adhered to. This includes requirements relating to waste emissions (e.g. hazardous, airborne, liquid and solid), waste disposal practices, noise regulations, road traffic ordinance etc.
- Reasonable measures to avoid pollution and environmental degradation are to be provided for.
- The costs of remedying pollution, environmental degradation and consequent adverse health effects and of preventing, controlling, or minimizing further pollution, environmental damage or adverse health effects must be paid for by the person responsible for harming the environment.
- The responsibility for the environmental, health and safety consequences of the proposed development exists throughout its life cycle.

1. CHAPTER ONE: BACKGROUND

1.1. Introduction

The proponent **KUNTA RESORT CC** intends to Subdivide Portion A (26,182m²) of Oniipa Town And Townlands No. 1164, Incorporation of Portion A into Oniipa Townlands Boundaries and Lodge Establishment on Portion.

In this respect the proponent has appointed EnviroPlan Consulting cc to undertake an Environmental Scoping Assessment (ESA), formulate an Environmental Management Plan (EMP) and apply for an Environmental Clearance Certificate (ECC) to the Ministry of Environment, Forestry and Tourism (MEFT): Directorate of Environmental Affairs (DEA) for the proposed development.

This document forms part of the application to be made to the DEA's office for an Environmental Clearance certificate for the proposed sub-division and establishment of a lodge according 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 proposed lodge is sited in Oniipa, adjacent to Onamulunga Service station to the South of the B1 Road. The project locality Map is on Figure 1:

1.3. Project site overview

The proposed portion of land can accommodate the proposed project in terms of spatial requirements of the activity because the plot is measuring 26,182m². It is imperative to understand the proposed project area is still part of the communal lands near Oniipa Town, however because of the proximity of the portion of land it has access to all municipal services and reticulation systems.

There is clear evidence human encroachment and development on the proposed project area, as part of the portion is a disused mahangu field, and the other portion has been land lying idle awaiting development. The project site cannot be classified pristine in any way, since it is heavily disturbed by human activities, and within its surroundings are residential homesteads, beer shebeens, a fuel station, and a shopping complex. The area affected by development still has some vegetation cover and the remaining trees on site will be recommended for conservation and should be kept as part of the development.

There is power supply to the site as well as water supply to the plot, in addition to that a sewer reticulation system where the lodge development will be connected has been identified and this will be in compliance to Oniipa Town By-Laws



Figure 1: Proposed Project Site.

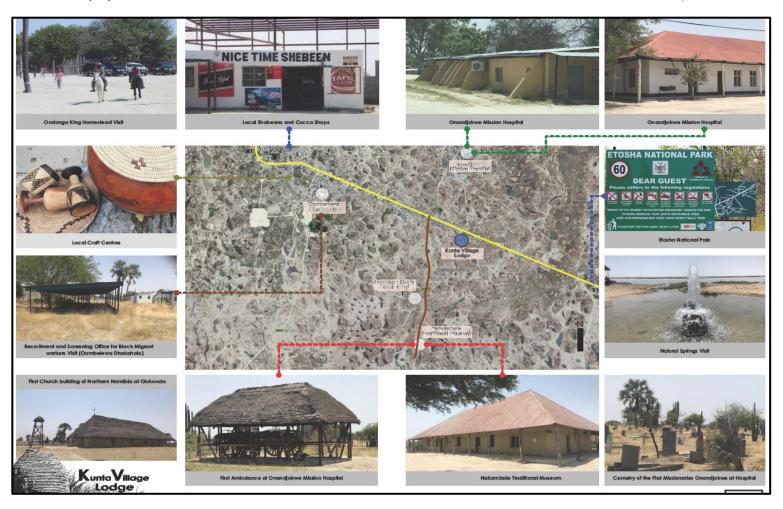


Figure 2: Kunta Resort Attractions Locality

1.4. Project Overview

The applicant Kunta Resort cc, intends to establish a lodge facility in Oniipa Town in a bid to promote local tourism and culture, through marketing local traditional attractions and activities to Namibia and the world at large. To achieve this, the proponent has to incorporate the piece of land to Oniipa Town. The proposed infrastructure will have minimal impacts on the natural resources, i.e. water, fauna and flora since the area is already disturbed by human activities such as agriculture and infrastructure development.

1.5. Proposed Development

The Erf is currently not connected to the Oniipa municipal reticulation network as it is located outside the built-up and serviced area. All additional and extensions of municipal services such as sewer, water and electricity will be part of the development. The proposed Village lodge will be composed of the following:

- Five Traditional Oshiwambo Accommodation Units
- Five Camping sites
- Five Modern Guest Suites
- Braai Areas
- Volley Ball courts
- Parking area
- Artificial Pool

The proposed development layout is as follows:

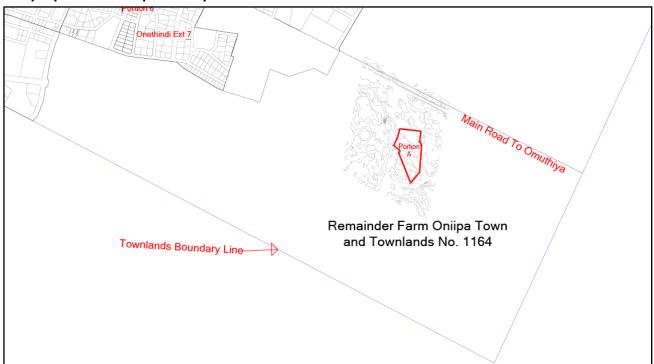


Figure 3: Incorporation Locality



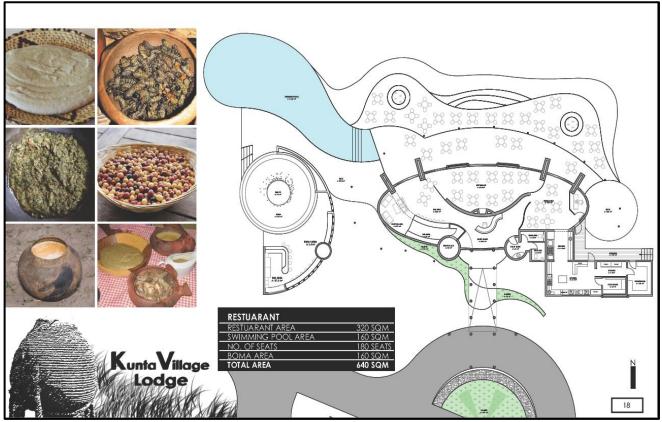


Figure 4: Lodge Layout Plan

1.6. Accessibility

The site is easily accessible from an existing gravel road connecting to the B1 Highway.

1.7. Land Use and Ownership

The piece of land is owned by Kunta Resort cc.

1.8. Infrastructure and Services

- Water: There is an existing bulk water supply close to the project site, and it is currently in use for other activities such as a service station and it is sufficient.
- Ablution: There are municipal bulk wastewater connections near to the project site and the
 proponent will connect to the bulk wastewater reticulation system to avoid on-site storage
 on any effluent waste
- **Electricity:** The ERF has an existing electricity connection.
- **Communication:** The site is connected with MTC, TN Mobile and satellite phones.

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 to; 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 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: Policies, legal and Administrative regulations

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

Aspect	Legislation	Relevant Provisions	Relevance to the Project		
The Constitution			 The project will enable the full execution of right to practice any profession, or carry on any occupation, trade or business by availing necessary provisions such as practising any profession, or carry on any occupation, trade or business in the country. Through implementation of the environmental management plan, the proponent will ensure conformity to the constitution in terms of environmental management and sustainability. 		
National Development Plans		 Namibia's overall Development ambitions are articulated in the National 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. The Government has so far launched a 4th NDP focusing on high and sustained economic growth, increased income equality Employment creation. 	The proposed project will propel NDP4 targets in tourism development. Adding on, this will create employment which will work towards the NDP and Vision 2030.		
Archaeology	National Heritage Act 27 of 2004	 Section 48(1) states that "A person may apply to the Namibian Heritage Council (NHC) for a permit to carry out works or activities in relation to a protected place or protected object" 	Any heritage resources discovered would require a permit from the NHC for relocation.		
	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:	The proposed site of development is not within any known monument sites, both movable and immovable as specified in the Act, however in finding any materials specified in the Act,		

		 Meteorites, fossils, petroglyphs, ornamental infrastructure graves, caves, rock shelters, middens, shells that came into existence before the year 1900 AD; or any other archaeological or palaeontological finds contractors on site will take the required route and notify the relevant commission.
Environmental	Environmental Management Act 7 of 2007	 Requires that projects with significant environmental impacts are subject to an environmental assessment process (Section 27). Requires for adequate public participation during the environmental assessment process for interested and affected parties to voice their opinions about a project (Section 2(b-c)). According to Section 5(4) a person may not discard waste as defined in Section 5(1)(b) in any way other than at a disposal site declared by the Minister of Environment and Tourism or in a manner prescribed by the Minister. Details principles which are to guide all EIAs
	EIA Regulations GN 57/2007 (GG 3812)	 Details requirements for public consultation within a given environmental assessment process (GN No 30 S21). Details the requirements for what should be included in a Scoping Report (GN No 30 S8) an EIA report (GN No 30 S15).
	Pollution and Waste Management Bill (draft)	 This bill defines pollution and the different types of pollution. It also points out how the Government intends to regulate the different types of pollution to maintain a clean and safe environment. The bill also describes how waste should be managed to reduce environmental pollution. Failure to comply with the requirements considered an offence and is punishable. The project should be executed in harmony with the requirements of the act to reduce negative impacts on the surrounding environs from waste during construction or operation. Oniipa Town waste management by laws will be abide to during construction and operation.
	Soil Conservation Act 76 of 1969	 This act makes provision for combating and for the prevention of soil erosion, it promotes the conservation, protection and improvement of the soil, vegetation, sources and resources of the Republic of Namibia. The Project impact on soil will rather be localised, however the Act should provide for guidelines of operation during construction to prevent soil erosion and contamination during operation.
	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, Forming part of the EIA of and EMP for this Project, the proponent will consider all associated impacts, both acute and long term,

		biosafety, and biosystematics protection on both terrestrial and aquatic systems.	and will propose methods and ways to sustain the local biodiversity.
Forestry	Forest Act 12 of 2001	 Tree species and any vegetation within 100m from a watercourse may not be removed without a permit (\$22(1)) Provision for the protection of various plant species. 	 The clearing of vegetation is prohibited (subject to a permit) 100m either side of a river. Certain tree species occurring in the area are protected under this Act. Permits must be obtained from MAWF in accordance with the Act. However, on site there are no trees that require clearing permit.
Water	Water Act 54 of 1956	 The Water Resources Management Act 24 of 2004 is presently without regulations; therefore, the Water Act No 54 of 1956 is still in force: A permit application in terms of Sections 21(1) and 21(2) of the Water Act is required for the disposal of industrial or domestic wastewater and effluent. Prohibits the pollution of underground and surface water bodies (S23(1). Liability of clean-up costs after closure/ abandonment of an activity (S23(2)). Protection from surface and underground water pollution 	The protection of ground and surface water resources should guide development's layout plans.
Health and Safety	Labour Act (No 11 of 2007) in conjunction with Regulation 156, 'Regulations Relating to the Health and Safety of Employees at work'.	 135 (f): "the steps to be taken by the owners of premises used or intended for use as factories or places where machinery is used, or by occupiers of such premises or by users of machinery about the structure of such buildings of otherwise to prevent or extinguish fires, and to ensure the safety in the event of fire, of persons in such building;" (Ministry of Labour and Social Welfare). This act emphasizes and regulates basic terms and conditions of employment, it guarantees prospective health, safety and welfare of employees and protects employees from unfair labour practices. 	The proponent will employ several people from the local and shall ensure securing a safe environment and preserving the health and welfare of employees at work. This will include applying appropriate hazard management plans and enforcing Occupational Health and Safety (OHS) enforcement by contractors.
	Public Health and Environmental Act, 2015	 Under this act, in section 119: "No person shall cause a nuisance or shall suffer to exist on any land or premises owned or occupied by him or of which he is in charge any nuisance or other condition liable to be injurious or dangerous to health." 	The lodge construction and operations will ensure compliance to the terms of the Act.

Services and	Road Ordinance 1972	 Width of proclaimed roads and road reserve boundaries (S3.1) 	- Although the project is a major boost for the
Infrastructure	(Ordinance 17 0f 1972)	 Control of traffic during construction activities on trunk and main roads (S27.1) Infringements and obstructions on and interference with proclaimed roads. (S37.1) Distance from proclaimed roads at which fences are erected (S38) 	proponent needs to ensure that the
Municipal By-Laws and Regulations	Ton Planning Scheme	 Provides for land use zonation's, restricted activities and procedures and guidelines for land use changes from proclaimed use. 	 The proponent will ensure that they abide to all town planning requirements in terms of using land for this specific use through following town planning procedures with a Town Planning Consultant.
	Health and Safety	 Provides for guidelines in terms of operation of lodge establishment, sell and preparation food, sanitation, liquor as well as disease control 	
	Solid Waste Management	 This tackles handling on waste to be generated during the construction and operation phases of the project. 	 The construction and operational environmental management plan will ensure that solid waste management is tackled in accordance to the municipal Solid waste management policy.

3. CHAPTER THREE: ENVIRONMENTAL MANAGEMENT PLAN (EMP)

3.1. Introduction

This section is aimed at describing the Environmental Management Plan (EMP) for the proposed subdivision, incorporation and lodge establishment project. The EMP stipulates the management of environmental programs in a systematic, planned and documented manner. The EMP below includes the organizational structure, planning and monitoring for environmental protection at the proposed farm area development and other areas of its influence. The aim is to ensure that the facility maintains adequate control over the project operations to:

- To prevent negative impacts where possible;
- Reduce or minimise the extent of impact during project life cycle;
- Prevent long term environmental degradation.

3.2. EMP Administration and Training

There is a strong need to clearly outline the roles and responsibilities of all stakeholders to ensure that the EMP is fully implemented. There is also a need for the proponent to appoint an overall responsible person (Environmental Control Officer) to ensure the successful implementation of the EMP. The Environmental Control Officer needs to have qualifications and knowledge in environmental management /sciences, and understanding of EMP administration. Under the management actions, each action is allocated to a responsible entity to ensure that the specific action is managed and documented properly. All key role players such as contractors who will be involved during the construction of the services must be informed about the contents of this EMP and activities to be undertaken to mitigate the potential impacts identified. All key personnel who will be involved in project management and implementation will be informed about the contents of this EMP through structured training programs; this will form part of the regular site meetings and briefings.

3.3. Construction Phase Impacts

The lodge construction phase forms an integral part of the project development cycle. It is however crucial to note that the development entails activities that will pose threats to the surrounding environs and impacts will range from vegetation removal, construction waste, noise and air pollution among other impacts. As assessed in the impact assessment chapter the EAPs noted crucial environmental impacts associated with the construction phase and as follow up to the impacts identified and assessed, the following impact management plan has been crafted:

Table 2:Impacts associated with the Construction Phase

IMPACT	DESCRIPTION	EFFECTS	CLASS	TIME FRAME	RESPONSIBILITY	ACTION
Noise pollution	Noise will be generated through: -Access road upgrading -Construction of site administration offices -Moving vehicles.	 The health of working personnel could be disturbed. Residents could be disturbed by the noise. General annoyance Driving away of local animal species near the project site 	Environmental	2-3 months	Environmental Control Officer	 - A construction interval will be established, and adhered to. - Workers will be issued and provided with personal protective equipment. - Public will be notified through printed timetable stating planned operational activities. - Construction activities will be conducted during daytime.
Dust Generation	Dust will accumulate because of the land preparation and ground excavation by movement of construction equipment	- Can lead to respiratory illnesses especially to those working in the areaincrease Particulate matter levels in the air and cause visual pollution	Environmental/ occupational	2-3 months	Environmental Control Officer Contractor	- Dust suppression will be done through watering dust source surfaces.
Debris Accumulation	Debris will accumulate due to construction activities, removal of existing dilapidated infrastructure on site	Can be an eyesore.Can be source of water and soil pollution.can result in scenic pollution	Environmental	2-3 months	Environmental Control Officer	Reuse reusable material such as bricks. Collect all non-reusable debris and dispose applying appropriate waste management procedures.
Occupational health and safety risks and accidents	Construction related Safety and Health hazards	-Injuries to workers such as Occupational dermatitis, slips and fall of humans and objects, musculoskeletal disorders, etc.	Health and safety	Project life time	Environmental Control Officer	- Equip workers with Personal Protective Equipment (PPE) provide trainings on how to effectively use the PPEProvide platforms for briefings and meetings about possible safety and health hazards in the work place
Employment creation	The construction exercise provides an opportunity of outsourcing work	- Improves disposable income to those employed and their immediate families.	Socio-economic	Project life time	Environmental Control Officer	- Work with local councillor on acquiring non- skilled labour from the residents.
Services and Infrastructure	Connection of sewer, electricity and roads compliance	-Non compliance to standards and regulations can pose threats to public health	Socio-economic	Project life time	Proponent	-The proponent should ensure that all permits for sewer, electricity and access roads have been obtained prior to construction.

3.4. Operational Phase

The operational phase is the most critical component of project implementation and it is normally associated with several severe impacts. The phase comprises of the actual operation of the lodge facility. This phase is expected to last for over 50 years of operation if the venture is still viable. There will be several impacts that will occur daily or other sequential routine. The phase forms the basis of an Environmental Management Plan that is detailed in Chapter. The major impacts identified by this study for the operation phase are as detailed in the previous chapter.

Table 3: Impacts associated with the Operation Phase

IMPACT	DESCRIPTION	EFFECTS	CLASS	TIME FRAME	RESPONSIBILITY	ACTION
Noise pollution	-Vehicle movements -Periodic road upgrading	- The health of working personnel could be disturbed Residents could be disturbed by the noise General annoyance -Driving away of local animal's species near the project site.	Environmental	Project life time	Environmental Control Officer	 Schedule road maintenance during day time and avoid upgrades over short periods of time. Provide public notices through printed timetable showing schedule of planned work
Solid waste pollution	Solid waste emanating from food wastes, packaging materials, containers, household waste, glass, wood, etc	- Can result health issues and some waste can be highly hazardous and toxic to the environment	Environmental	Project Life time	Environmental Control Officer	-An initial waste audit will be conducted to identify areas type and volume of wasteWhen it is appropriate, materials will be reused and/or sent to recycling agents based in Oniipa to minimize the amount of waste generatedBiodegradable waste will be composted and used on lawns and flowers on and around the site as part of environmental responsibility of the company.
Human movements	Visitors/ tourists to the site will have interests in moving around the lodge environs for scenic views.	-Movements may drive away animals within the radius of the site This can also result in vehicle vibrations which maybe a nuisance to some people in the surrounding area.	-Ecological -Social	Project life time	Operations manager	-Come up with a social contact policy guiding the movement of visitors around the area -Promote the use of wild tracks and no vehicle tracks in the bushes to avoid driving away wild animalsEnsure that nearby residents do not feel social intrusion.
Occupational Hazards / Work place accidents	Operating of restaurant equipment such as stoves, irons, boilers etc can cause workplace injuries	-Potential accidents and illnesses.	Health, social	-Project life time	Ministry of Labour	-Health and safety regulations should be enforced on all the workersSafety regulations include life and health insurance, first aid kits; protective clothing such as uniforms and glovesProper storage of highly flammable products such as gas etc, and installation of fire

						extinguishers. Workers should not be allowed to exceed working hours.
Employment creation	Employment creation for the residents	- Increases disposable income Decreased Rural to urban migration.	Socio-economic	Project Life Time	Local Councillor	Provide information to the local community detailing labour requirements. Conduct transparent recruitment process of workers and of contractors, providing preferences to the locals where feasible.
Immoral Behaviour	Increased inflow of people into the area may result in immoral behaviour and increased sexual activities.	-Increased infection of HIV/AIDS and other sexual diseasesIncreased unwanted and teenage pregnancies -Increase in thieving incidences, assaults and robberiesIncreased incidences of drugs and alcohol abuse.	Socio-economic	Project Life Time	Operations manager and Tyeye Village Headman	- Conduct awareness campaigns on promiscuity and HIV/AIDS issuesEducate tourists and travellers on social decency and sexual health.

3.5. Solid Waste Management

Kunta Resort cc's waste management plan will follow the waste management principles of reusing, recycling and reducing. This will imply that at waste generation on site will be minimal to ensure that there is no waste management problem. Waste that can be reused will be put to appropriate use such as reusing plastic packages, and containers.

Waste segregation will be done in relation to biodegradable and non-biodegradable waste. Biodegradable waste such as vegetables, food leftovers and paper will be composted on site and the compost will be used on lawn and flowers to be planted on site. All recyclable waste will be separated and delivered periodically by the proponent to waste recycling companies.

3.6. Sewage and Effluent Waste Management

All effluent waste generated by the lodge operations will be channelled through to Oniipa town sewerage reticulation system that has been planned for, i.e, the proponent will provide for upstream and downstream sewer reticulation system that connects to the bulk sewerage system already nearby.

Strict maintenance to Oniipa Town Council's Environmental Health guidelines in terms of sewer reticulation maintenance and management to ensure that there is no pollution of groundwater and surface water sources. In addition, effective and efficient sewer management would prevent contaminable diseases such as hepatitis and cholera, thus it is extremely important to ensure compliance to environmental Health guidelines by City of Windhoek.

4. CHAPTER FOUR: CONCLUSION AND RECOMMENDATIONS

The environmental impact assessment process for the proposed lodge development was conducted in accordance to the Environmental Management Act 2007 and EMA Regulation 2012. Further consideration was given to relevant legislation throughout the entire process to ensure a successful assessment process.

Impacts likely to occur during project phases (construction and operation) were assessed depicting a positive outlook despite limited details of the magnitude of the proposed development. Based on the assessment, the overall project is expected to have minimal negative impacts on the environment. The development is also anticipated to have positive impacts such as job creation opportunities and tourism development. Impacts with negative effects were also identified and summarized in a form of environmental management plan to ensure sustainable implementation.

The site has access to services such as electricity and roads for accessibility. Adding on the site has minimal vegetation such that no trees will be removed during the construction phase. It is important that the proponent observe and maintain accountability to both socio-economic and environmental sensitive activities from the project, such that the project is harmonized with policy, regulations, administrative frameworks and social interface with the public as proposed in the environmental management plan. Failure to observe these measures will significantly affect the local environment and lead to non-compliance. Therefore, implementation environmental protection measures should be executed in consultation with the key stakeholders.

EnviroPlan hereby recommends that MEFT: DEA grant the environmental clearance certificate for the proposed subdivision process and lodge establishment project, under the condition of full implementation of this EMP.