

ECC-01-77-LET-12-A

10 August 2023

Ministry of Environment, Forestry and Tourism
Department of Environmental Affairs
Private Bag 13306
Windhoek
Namibia

RECEIVED BY OFFICIAL STAMP

Signature: _____

Date: / /

FOR ATTENTION: MR TIMOTEUS MUFETI – ENVIRONMENTAL COMMISSIONER (MINISTRY OF ENVIRONMENT, FORESTRY AND TOURISM)

RE – RENEWAL APPLICATION FOR AN ENVIRONMENTAL CLEARANCE CERTIFICATE FOR AND EXISTING ANTENNA MAST ERECTED IN 2008 ON ERF 617 IN OLYMPIA, WINDHOEK, KHOMAS REGION.

Dear Mr Timoteus Mufeti,

Environmental Compliance Consultancy (ECC) has been engaged by Mr. Andrew Thomson, to act on his behalf for the environmental clearance certificate renewal application for an existing telecommunication tower erected in 2008 which is used for radio communication on Erf 617 in Olympia, Windhoek, Namibia.

The environmental clearance was granted on the 24th of August 2020. Table 1 attached to this letter indicates the actions stipulated in table 2 of the EMP and comments to show compliance. ECC has compiled this application in accordance with the Environmental Management Act No. 7 of 2007 on behalf of the proponent.

ECC hereby submits the renewal application consisting of:

- **Completed form 1** - Environmental Management Act No 7. Of 2007, section 32 application for renewal of the environmental clearance certificate
- **Approved environmental clearance certificate** – Dated 24th of August 2020
- **Environmental management plan (EMP)** - Previously submitted project specific EMP

Should you require our assistance with the details in this letter or report, please do not hesitate to contact us. We look forward to hearing from you at your earliest convenience.

Yours sincerely,



Stephan Bezuidenhout

stephan@eccenvironmental.com



Jessica Bezuidenhout Mooney

jessica@eccenvironmental.com

Aspect	Restriction / Action	Comment
Community Management	<ul style="list-style-type: none"> A complaints register must be opened and maintained to record any community concerns or issues associated with the communication antenna. Community members can make complaints in writing to the proponent via email. 	<ul style="list-style-type: none"> No complaints received during the period, and a complaint register is available in the event a complaint is received in the future.
Safety and Maintenance	<ul style="list-style-type: none"> All maintenance work required for the antenna must be done in accordance with the manufacturer's recommendations. Public safety and worker safety must always be maintained. In the event of weather damage, the proponent must repair and make safe the antenna. 	<ul style="list-style-type: none"> All maintenance work has been done in accordance with the manufacturer's recommendations and shall continue as such in the future. Public and workers safety have been maintained and no weather damage has been encountered.
Waste	<ul style="list-style-type: none"> No persons may litter. Bins are to be provided and are to be removed on a regular basis. 	<ul style="list-style-type: none"> No littering has been recorded, and bins have been removed on a regular basis and shall continue as such in the future.
Visual Amenity	<ul style="list-style-type: none"> The requirement for red obstruction light on top of the tower must be complied with. It must remain in place during operations. 	<ul style="list-style-type: none"> Red obstruction light requirements have been complied with and remained in place during operations.
Decommissioning	<ul style="list-style-type: none"> All infrastructure associated with the communication antenna is to be dismantled and removed should the proponent vacate the property. 	<ul style="list-style-type: none"> The proponent has not vacated the property.
	<ul style="list-style-type: none"> Waste materials are to be separated into salvageable and non-salvageable materials. 	<ul style="list-style-type: none"> No decommissioning occurred. Materials will be separated accordingly should decommissioning happen in future.
	<ul style="list-style-type: none"> Salvageable waste is to be removed from site for re-use. 	<ul style="list-style-type: none"> No decommissioning occurred. Salvageable waste will be removed for reuse should decommissioning happen in future.
	<ul style="list-style-type: none"> Notification to regulators of decommissioning and photo evidence that decommissioning has been completed to acceptable level 	<ul style="list-style-type: none"> No decommissioning occurred. Regulators will be notified in future.



ECC DOCUMENT CONTROL: ECC-01-77-REP-04-C

ENVIRONMENTAL MANAGEMENT PLAN

For Radio Communications Antenna Mast on ERF 617

June 2020

Project Name: Radio Communications Antenna Mast on ERF 617, Olympia, Namibia
Project Number: ECC-01-77-REP-04-C
Client Name: Mr Andrew Thomson
Ministry Reference: NA
Status of Report: Final for Regulatory Submission
Date of issue: June 2020
Review Period NA

Environmental Compliance Consultancy Contact Details:

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Confidentiality

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Please note at ECC we care about lessening our footprint on the environment; therefore, all documents are printed double-sided.

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DEFINITIONS AND ABBREVIATIONS

DEA	Directorate of Environmental Affairs
ECC	Environmental Compliance Consultancy
EIA	Environmental Impact Assessment
EMA	Environmental Management Act
EMP	Environmental Management Plan
I&AP	Interested and Affected Parties
MEFT	Ministry of Environment, Forestry and Tourism

1 INTRODUCTION

1.1 BACKGROUND

This Environmental Management Plan (EMP) has been compiled to support the application for environmental clearance for an existing radio communications antenna on Erf 617, Olympia, Namibia.

Listed activity 10.1 (j) is triggered

- Masts of any material or type and of any height, including those used for telecommunication broadcasting and radio transmissions.

The EMP has been developed to address potential environmental impacts associated with the infrastructure. As the antenna has been in operation for twelve years there are no construction activities associated with this project or EMP. Therefore, this EMP only addresses the operational issues and decommissioning.

1.2 DOCUMENT HIERARCHY

This Environmental Management Plan (EMP) has been developed to assist the proponent in the operational and decommissioning phases of the communications antenna.

Where there is any conflict between the provisions of this EMP and any contractor's obligations under their respective contracts, including statutory requirements (such as licences, Project Approval conditions, permits, standards, guidelines, and relevant laws), the contract and statutory requirements are to take precedence.

1.3 OBJECTIVES

The objective of this EMP is to detail the environmental management framework, practices, and procedures that will be followed during the operations of the communications antenna, with the aim of minimizing potential environmental impacts and ensuring that statutory requirements and other obligations are fulfilled.

1.4 SITE DESCRIPTION

Application for an Environmental Clearance Certificate for an existing telecommunication tower erected in 2008 in the Khomas region, Namibia. The existing tower is used for hobby radio communication and has been operational for the past twelve years.

The antenna site is located on Erf 617 in Olympia within the built environment of the City of Windhoek. The project site is surrounded by, mixed use residential, businesses, medical rooms, hospital, sporting grounds and facilities, and the MTC headquarters in Olympia. The antenna is located on the north-eastern quadrant of the erf. The freestanding antenna tower is located adjacent to the southern wall of the outbuilding on the residential erf and is bolted to a 12 tonne reinforced concrete foundation as per design specifications.

Title of Activity:

Radio Communications Antenna Mast on Erf 617, Olympia, Namibia

Nature of Activity:

Communication tower and associated antenna systems for HF and VHF communications within the amateur radio service, in terms of a Spectrum Use Licence granted by the Communications Regulatory Authority of Namibia (CRAN).

Location of Activity:

Erf 617

27 Louis Raymond Street, Olympia, Windhoek

Latitude 22° 36' 23.08" S

Longitude 17° 06' 03.77" E

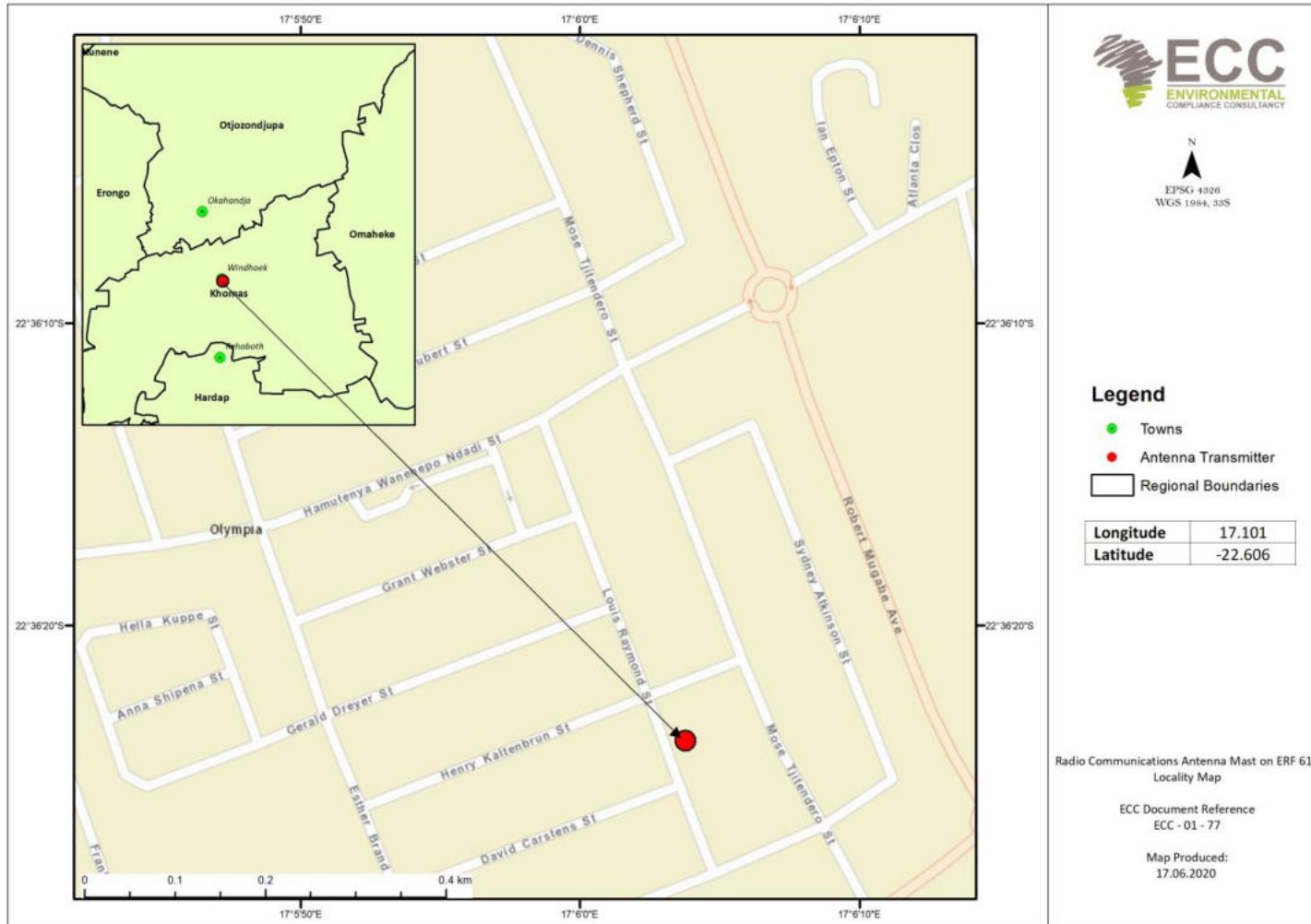


FIGURE 1 – RADIO COMMUNICATIONS ANTENNA MAST LOCALITY MAP

1.5 PROJECT SUMMARY

The communication tower and associated antenna systems are used for hobby radio communications. It is used solely by the owner for personal use in international radio competitions. The tower was approved by the Directorate of Civil Aviation in the Ministry of Works, Transport, and Communication in 2007 stating that the office had no objections against the erection of the masts provided it is restricted to a height of less than 35 meters above the ground. The erected tower stands 21.5 meters above the ground. The requirement for red obstruction light on top of the tower was installed at the time of construction and remains in place and operational.

The COW approved the erection of the tower in 2007 on the condition that a registered engineer certifies that the antenna is a safe structure. The structure was designed and fabricated by certified engineers in South Africa, all plans and drawings were submitted to the COW upon completion.

1.6 LEGAL COMPLIANCE

An environmental clearance is required for any activity listed as per Government Notice No 29 of 2012 of the EMA. In this case, the following listed activity is triggered in accordance with the Act:

Listed activity 10.1 (j) is triggered

Masts of any material or type and of any height, including those used for telecommunication broadcasting and radio transmissions.

A review of relevant legal legislation has been conducted for the existing infrastructure. The table below identifies relevant legal requirements specific for the project.

TABLE 1 - LEGAL COMPLIANCE – PROJECT SPECIFIC

ASPECT	LEGISLATION	RELEVANT PROVISIONS	RELEVANCE TO THE PROJECT
The Constitution	Namibian Constitution First Amendment Act 34 of 1998	<ul style="list-style-type: none"> - Article 91 defines the function of the Ombudsman and 91 (c) describes the duty to investigate complaints concerning the over-utilisation of living natural resources, the irrational exploitation of non- renewable resources, the degradation and destruction of the ecosystem and failure to protect the beauty and character of Namibia. 	<ul style="list-style-type: none"> - The proponent will ensure community complaints are registered and actioned as per the EMP.
Infrastructure	City of Windhoek Policy for the Erection of Telecommunication facilities in Windhoek (2008)	<ul style="list-style-type: none"> - Provides clear guidelines, standards and assessment criteria to assist the development, control, design, installation, appearance and monitoring of telecommunication facilities within the City of Windhoek area. 	<ul style="list-style-type: none"> - Approval letter issued by the Ministry of Works, Transports and Communication, 2007 - Approval letter issued by the City of Windhoek, 2007 - Proponent letter to the Directorate of Civil Aviation - Consent from neighbouring property owners
Environmental Impact Assessment	Environmental Management Act 7 of 2007 EIA Regulations GN 6 February 2012	<ul style="list-style-type: none"> - The Environmental Management Act (EMA) (7 of 2007) has been compiled and is regulated by the Ministry of Environment Forestry and Tourism (MEFT). This Act was gazetted on 27 December 2007 (Government Gazette No. 3966) and the Environmental Impact Assessment Regulations: Environmental Management Act, 2007 (Government Gazette No. 4878) were promulgated on 6 February 2012. - In terms of this legal framework, certain identified activities may not commence without an Environmental Clearance - a certificate that is issued by MEFT. Listed activity - Listed activity 10.1 (j) is triggered <ul style="list-style-type: none"> o Masts of any material or type and of any height, including those used for telecommunication broadcasting and radio transmissions. 	<ul style="list-style-type: none"> - The proponent makes the application for exemption in the prescribed manner accompanied by the prescribed form (Form 2) in accordance with the Act.
Communication	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. 	<ul style="list-style-type: none"> - As per the relevant spectrum use licence
Health and Safety	Labour Act	<ul style="list-style-type: none"> - Empowers the minister responsible for labour to publish regulations pertaining to health and safety of labourers. 	<ul style="list-style-type: none"> - Only applicable at decommissioning proponent to ensure implementation
	Health and Safety Regulations	<ul style="list-style-type: none"> - Details requirements pertaining to health and safety of workforce 	

2 ENVIRONMENTAL MANAGEMENT FRAMEWORK

2.1 ROLES AND RESPONSIBILITIES

The proponent takes sole responsibility for the implementation of the EMP. The roles and responsibilities for the EMP are combined into one position being the 'Proponent'.

2.2 PROPONENT

The proponent will be available throughout the operations of the communication antenna. Should the antenna be decommissioned the proponent, or his nominated representative will be responsible for decommissioning. The proponent will be responsible for the following roles:

- Ensuring awareness of the commitments made in the EMP and any other relevant regulatory requirements
- Review and implement corrective actions arising from inspections etc.
- Responding to community questions or concerns
- Principal contact point in relation to environmental or community issues.
- Notification of relevant regulatory authorities if serious environmental incidents occur as soon as practicable.
- Responsible for receiving and responding to environmental related complaints received from the public or other stakeholders.
- Maintaining and providing assistance in the implementation of this EMP.
- Ensuring statutory compliance with government agencies and legislation.
- Timely distribution of any relevant environmental documentation, including revisions to this EMP, to relevant parties.

3 ENVIRONMENTAL MANAGEMENT MEASURES

3.1 INTRODUCTION

The operation of the communication antenna is unlikely to cause any significant environmental impacts. Nevertheless, this Communication Antenna Management Plan (CAMP) has been prepared to minimize potential impacts associated with the project.

3.2 OBJECTIVES

The CAMP outlines appropriate management measures and reporting procedures to be implemented during the operations and decommissioning of the communication antenna.

3.3 RESPONSIBILITIES

The proponent is required to take all reasonable measures outlined in table 2.

TABLE 2 - GENERAL PROCEDURES FOR THE COMMUNICATION ANTENNA.

ASPECT	PHASE	RESTRICTION / ACTION	RESPONSIBILITY
Community Management	Operations Decommissioning	<ul style="list-style-type: none"> – A complaints register must be opened and maintained to record any community concerns or issues associated with the communication antenna. – Community members can make complaints in writing to the proponent via: <ul style="list-style-type: none"> – Email: athomson@iway.na OR – Post: Mr Andrew Thomson Owner P O Box 80033 Olympia Windhoek Tel: +264 81 129 1212 	Proponent
Safety and Maintenance	Operations	<ul style="list-style-type: none"> – All maintenance work required for the antenna must be done in accordance with the manufacturer’s recommendations. – Public safety and worker safety must be maintained at all times. – In the event of weather damage, the proponent must repair and make safe the antenna 	Proponent
Waste	Operations Decommissioning	<ul style="list-style-type: none"> – No persons may litter. – Bins are to be provided and are to be removed on a regular basis. 	Proponent
Visual Amenity	Operations Decommissioning	<ul style="list-style-type: none"> – The requirement for red obstruction light on top of the tower must be complied with. It must remain in place during operations. 	Proponent, Contractor
Decommissioning	Decommissioning	<ul style="list-style-type: none"> – All infrastructure associated with the communication antenna is to be dismantled and removed should the proponent vacate the property. 	Proponent or Nominated representative

	Decommissioning	– Waste materials are to be separated into salvageable and non-salvageable materials.	Proponent or Nominated representative
	Decommissioning	– Salvageable waste is to be removed from site for re-use.	Proponent or Nominated representative
	Decommissioning	– Notification to regulators of decommissioning and photo evidence that decommissioning has been completed to acceptable level	Proponent or Nominated representative

4 DOCUMENT LIMITATIONS

This Addendum Environmental Management Plan (EMP):

- A. Has been prepared pursuant to a contract with Mr Andrew Thomson;
- B. Has been prepared based on information provided to ECC up to June 2020.
- C. Is for the sole use of Mr Andrew Thomson for the sole purpose of an EMP;
- D. Must not be used (1) by any person other than Mr Andrew Thomson or (2) for a purpose other than an EMP; and
- E. Must not be copied without the prior written permission of ECC.

Neither ECC, its employees nor officers accept responsibility to any person in connection with the document.

ECC has prepared the EMP on the basis of information provided by Mr Andrew Thomson, which ECC has not independently verified or checked.



REPUBLIC OF NAMIBIA
MINISTRY OF ENVIRONMENT, FORESTRY AND TOURISM
OFFICE OF THE ENVIRONMENTAL COMMISSIONER

ENVIRONMENTAL CLEARANCE CERTIFICATE

ISSUED

In accordance with Section 37(2) of the Environmental
Management Act (Act No. 7 of 2007)

TO

Mr. Andrew Thomson
P O Box 80033, Olympia, Windhoek

TO UNDERTAKE THE FOLLOWING LISTED ACTIVITY

**OPERATION OF THE EXISTING ANTENNA MAST ERECTED IN 2008 ON
ERF 617 IN OLYMPIA, WINDHOEK, KHOMAS REGION**

[Signature]
MINISTRY OF ENVIRONMENT, FORESTRY AND TOURISM
Private Bag 13306
WINDHOEK, NAMIBIA
31 AUG 2020
ENVIRONMENTAL COMMISSIONER
REPUBLIC OF NAMIBIA

Issued on the date: **2020-08-24**
Expires on this date: **2023-08-24**

(See conditions printed over leaf)

This certificate is printed without erasures or alterations



CONDITIONS OF APPROVAL

1. This environmental clearance is valid for a period of 3 (three) years, from the date of issue unless withdrawn by this office
2. This certificate does not in any way hold the Ministry of Environment and Tourism accountable for misleading information, nor any adverse effects that may arise from these activities. Instead, full accountability rests with the proponent and its consultants
3. This Ministry reserves the right to attach further legislative and regulatory conditions during the operational phase of the project