

ENVIRONMENTAL MANAGEMENT PLAN
FOR
THE OMDEL – SWAKOP TEMPORARY PIPELINES



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LIST OF ABBREVIATIONS

AIDS	Acquired Immune Deficiency Syndrome
CoC	Code of Conduct
DEA	Directorate of Environmental Affairs
EMA	Environmental Management Act
EMP	Environmental Management Plan
HIV	Human Immunodeficiency Virus
I&AP	Interested and Affected Parties
MEFT	Ministry of Environment and Tourism
NEM	NamWater Environmental Manager
MSDS	Material Safety Data Sheet
NWQG	Namibian Water Quality Guidelines
NWQS	Namibian Water Quality Standards
STI's	Sexually Transmitted Infections

1. INTRODUCTION

1.1 Purpose of the EMP

This Environmental Management Plan (EMP) has been compiled for the management of potential environmental impacts during the construction, operation, and decommissioning phases of the Omdel–Swakop Temporary Pipelines. Best practice is proposed for the generic issues of construction management and supervision as well as the on-going management and operation of the water supply scheme.

In terms of the Environmental Management (Act No 7 of 2007) and the 2012 Regulations, the activities required for the construction of the proposed project requires authorisation from the Directorate of Environmental Affairs at the Ministry of Environmental and Tourism (MEFT: DEA).

1.2 Project Background

NamWater currently supplies a number of various bulk consumers located within the Central Coastal Namib Area with water sourced from the Omdel aquifer and the Orano Desalination Plant, located close to Wlotzkasbaken, approximately 40 km north of Swakopmund. One of the schemes supplying Swakopmund, Arandis and the uranium mines at the Central Coast is the Omdel – Swakopmund Water Scheme. From Omdel, where the groundwater is collected in a reservoir, it gravitates to the Orano off-take where it is joined with pumped desalinated water from the plant (see Figure 1 for a layout of the scheme).

Currently, approximately 500 m³/h can be provided from the Omdel Aquifer and 2,200 m³/h from the desalination plant (total production of 21.7 Mm³/a). However, the supply from the plant currently has to be restricted to 1,800 m³/h since the higher pressures required for these higher flow rates cause breaks on the lower sections of the old Omdel – Wlotzkasbaken pre-stressed pipeline, reducing the total production to 18.5 Mm³/a.

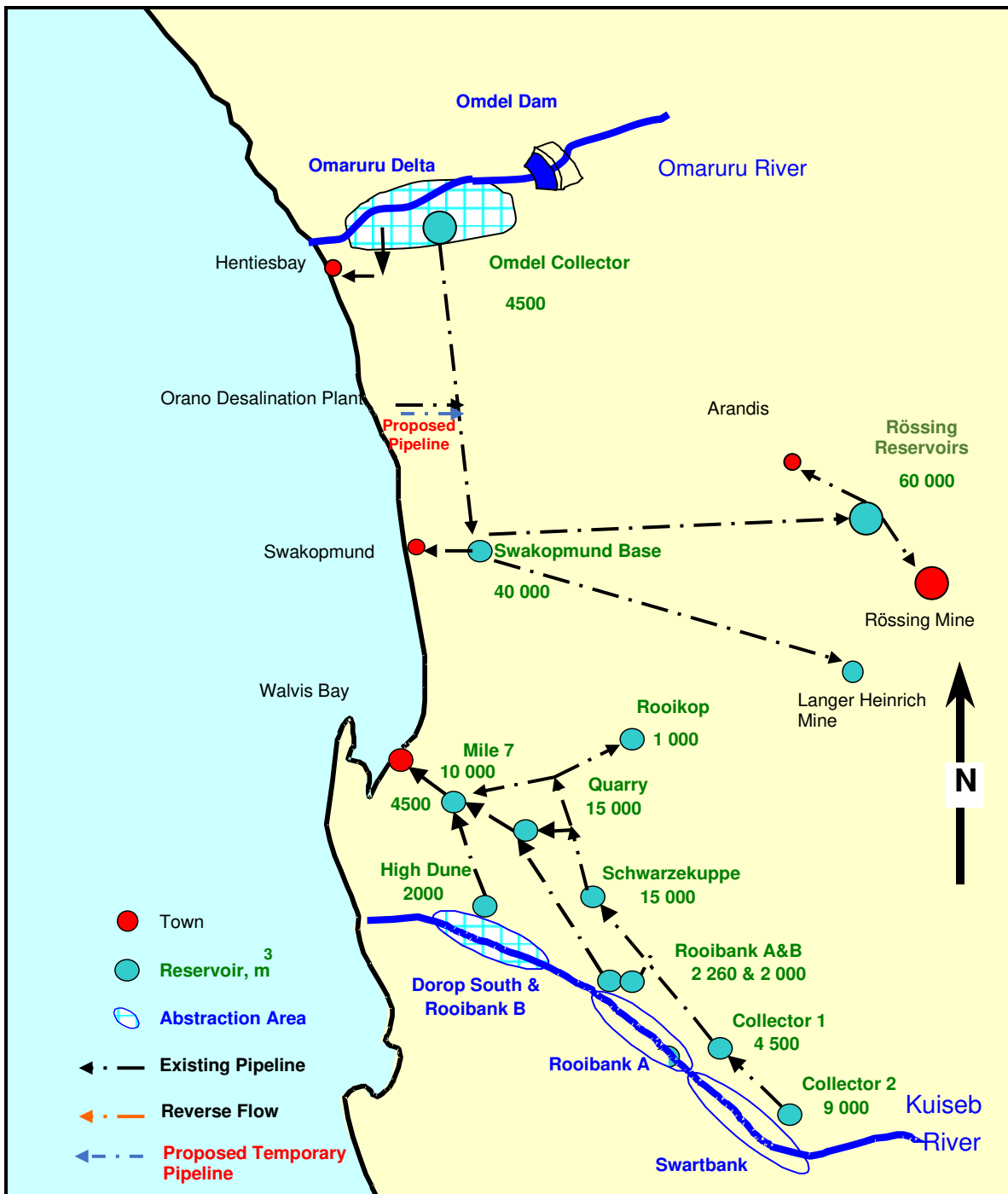


Figure 1: Layout of the Central Coastal Scheme

1.3 Objectives of the EMP

The Environmental Management Plan (EMP) has been developed to address the management of potential environmental impacts throughout the various stages of the proposed construction upgrading of the Omdel – Swakop Temporary Pipeline, including planning, design, operation, and decommissioning. The EMP encompasses best practises pertaining to the general aspects of construction management and supervision, as well as the continuous management and operation of the scheme.

The specific objectives of this EMP are:

- Present measures aimed at preventing, reducing, and mitigating negative effects on different environmental elements, as well as methods to enhance the value of these components whenever feasible.
- Establishing a clear delineation of the various roles and responsibilities associated with the execution of environmental management and mitigation measures.
- The need to adhere to regulatory provisions and guidelines.
- Explain the procedures involved in compliance monitoring and reporting to the relevant competent and regulatory authorities.
- Outline the procedures involved in the potential decommissioning process and the necessary environmental rehabilitations that must be undertaken.

2. EXISTING INFRASTRUCTURE

2.1 Overview of the existing water supply system

The Business Unit Coastal is one of four NamWater supply operational areas and is situated on the west coast of Namibia, extending from the Ugab River in the north to the Kuseb River in the south and Rössing to the east.

The bulk water supply in this area is presently based on groundwater abstracted from the alluvia in the lower reaches of two ephemeral river systems, the Kuseb River approximately 20 km south of Walvis Bay, and the Omaruru River 80 km north of Swakopmund as indicated in **Error! Reference source not found.** The Omdel and Kuseb groundwater schemes have been the mainstay water sources of the central coastal areas.

However, in November 2013 (and confirmed in 2017) the Department of Water Affairs reduced the groundwater abstraction permit for the Omdel Aquifer from 9 Mm³/annum to 4.6 Mm³/annum and has left NamWater to focus on the interim water supply from the Orano Desalination Plant at Wlotzkasbaken to meet water demands from both existing customers and new water supply applicants (NamWater Infrastructure Planning Report, 2018). The present major bulk water customers in the central coast are Walvis Bay, Swakopmund, Henties Bay, Arandis, Rössing Uranium Mine, Husab Uranium Mine and Langer Heinrich Uranium Mine.

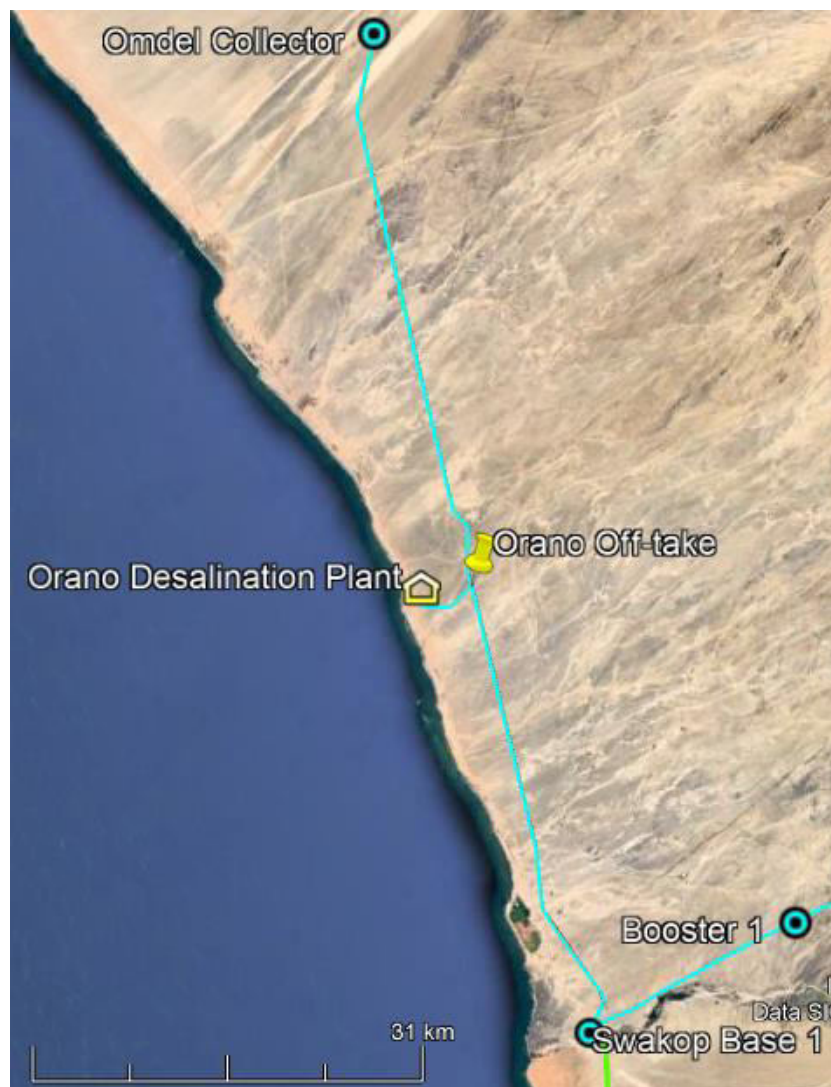


Figure 2: Omdel – Swakopmund Water Supply Scheme

2.2 Omdel-Swakopmund Water Supply Scheme

This bulk water supply scheme consists of the Omdel Dam, the Omdel Aquifer with its boreholes, two collector pipelines bringing water from the boreholes to the Omdel Collector Reservoir and the Omdel-Wlotzkasbaken-Swakopmund pipeline between the Omdel reservoir and the terminal reservoir at Swakopmund Base Station. A layout of this scheme is given in Figure 3.

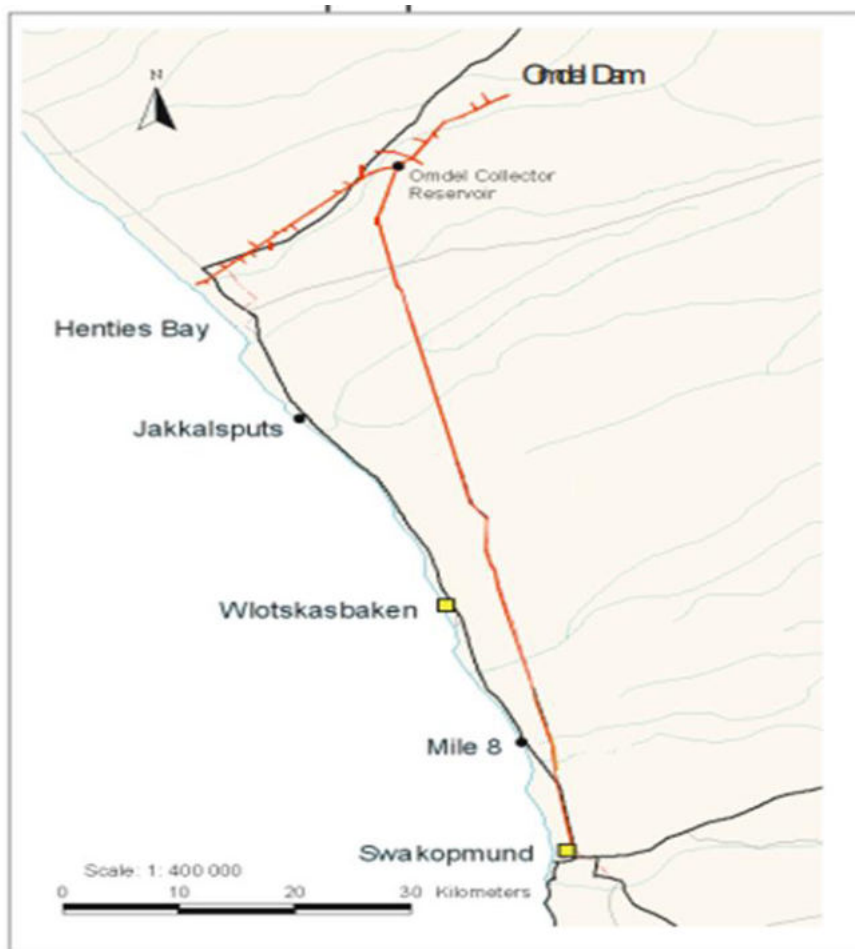


Figure 3: Layout of Omdel-Swakopmund Water Scheme

2.3 The need and desirability of the intended project

With the expected resumption of mining activities by Langer Heinrich Uranium Mine (LHU) in 2024 and higher demand by Husab, additional water will have to be provided by the Orano Desalination Plant. The current total demand for Swakopmund, Arandis, Husab, Rössing & Nonidas is 17.0 Mm³/a, and will increase to 19.6 Mm³/annum once LHU is on-line, in March 2024. The 2023 operations data shows that the current total production decreased from 20.2 Mm³/a to 17.4 Mm³/a. These conditions put tremendous strain on security of supply, with no reserve capacity built-up to bridge the supply situation. Given the current yearly production a shortage of **2.2 Mm³/a** is expected once LHU is operational.

A project to replace the lower 10.3 km portion of the Omdel–Wlotzkasbaken pipeline is already underway with the design work close to completion in FY 2023. The environmental study has been completed and an ECC was issued in May 2023. Funded by KfW/GRN, construction of Omdel–Wlotzkasbaken pipeline is expected to commence in 2024 with an estimated construction period of 12 months or more. It will hence not be ready by the time that water is required by LHU and to meet the current growing demand and peak demands being experienced.

3. THE LEGAL ENVIRONMENT

A legal review was done, and the key laws of concern include those which protect the ecological integrity of the ecosystem and its water resource, including the Water Act of 1954 and the Water Resources Management Act of 2004, and applicable international treaties such as the Convention on Biological Diversity. These laws and conventions place Namibia under an obligation to conserve the ecological integrity of the ecosystem for the sustainable use by Namibians.

3.1 The Constitution of the Republic of Namibia

There are two clauses contained in the Namibian Constitution that are of particular relevance to sound environmental management practice, viz. articles 91(c) and 95(l). In giving effect to articles 91(c) and 95(l) of the Constitution of Namibia, general principles for sound management of the environment and natural resources in an integrated manner have been formulated. The formulation of these general principles resulted in the Namibia's Environmental Assessment Policy of 1994. To give statutory effect to this Policy, the Environmental Management Act was approved in 2007, and gazetted as the Environmental Management Act (Act No. 7 of 2007) (herein referred to as the EMA. As the organ of state responsible for management and protection of its natural resources, MEFT: DEA is committed to pursuing the 13 principles of environmental management that is set out by Part 2 of the Act.

To summarise, Articles 91(c) and 95(l) refer to:

- o Guarding against over –utilisation of biological natural resources;
- o Limiting over-exploitation of non-renewable resources;
- o Ensuring ecosystem functionality
- o Protecting Namibia's sense of place and character;
- o Maintaining biological diversity and
- o Pursuing sustainable natural resource use.

3.2 Environmental Assessment Policy (1995)

Cabinet endorsed Namibia's Environmental Assessment Policy in 1995 as the first formal effort in Namibia to regulate the application of environmental impact assessments and environmental management. Amongst others, the Policy provides a procedure for conducting EIA's which sets out to:

- o Better inform decision makers and to promote accountability of decisions taken;
- o Strive for a high degree of public participation and involvement of all sectors of the Namibian community during the execution of the EIA;
- o Take into account the environmental costs and benefits of projects and programmes;
- o Promote sustainable development in Namibia;
- o Ensure that anticipated adverse impacts are minimized and that positive impacts are maximized.

3.3 Environmental Management Act (No 7 of 2007) (EMA)

The Environmental Management Act (EMA) was promulgated in 2007 by Parliament and gives effect to the Environmental Assessment Policy. The Act specifies the environmental assessment procedures to be followed as well as the listed activities (activities that require an EIA).

Of relevance to this project are the following listed activities, as provided in Section 27 of this Act, which include:

- o The construction of: oil, water, gas and petrochemical and other bulk supply pipelines (10.1 (a))

3.4 EIA Regulations Government Notice No. 30, promulgated on 6 February 2012

The regulations, promulgated in terms of the EMA, were promulgated on 6 February 2012 and indicated certain activities that require an Environmental Clearance from MEFT: DEA prior to commencing.

3.5 Water Act 54 of 1956 and Water Resources Management Act 11 of 2013

The Water Resources Management Act 11 of 2013 is presently without regulations; therefore the Water Act 54 is still in force. The Act provides for the management and protection of surface and groundwater resources in terms of utilisation and pollution.

4. PROPOSED DEVELOPMENT

4.1 Proposed Temporary Pipelines

The project entails a temporary placement of roughly 9.3 km of 250 mm dia. quick coupling steel pipes with clamps from the Orano Off-take to the Orano Reservoir. The pipeline will follow the route of the existing Orano Pipeline (and service road) to the Trekkopje Mine and it is thus not in a pristine environment as shown in Figure 4.



Figure 4: Google earth image of the proposed pipeline route



Figure 5: 250 mm dia. quick coupling steel pipes with clamps

4.1.1 Route selection

The temporary proposed pipeline will follow the existing pipeline route and will be placed between the existing service road and the existing pipeline. The pipeline will be decommissioned upon the completion of the proposed Omdel–Wlotzkasbaken pipeline.

4.1.2 Above ground vs below ground pipeline

The pipeline will be above ground as it is a temporary installation.

5. BRIEF DESCRIPTION OF THE AFFECTED BIOPHYSICAL AND SOCIO-ECONOMIC ENVIRONMENTS

This chapter presents a comprehensive examination of the existing baseline conditions inside the designated area for the building of the short-term water pipeline. The information provided in the subsequent section was obtained from the following sources:

- Literature research.
- Atlas of Namibia (Mendelsohn et al., 2009).
- Google Earth.
- EIA for the Omdel - Wlotzkasbaken pipeline replacement and pump station (LANA Environmental Consultancy)

5.1 Location

The central coastal area, situated in the Erongo Region, encompasses four towns: Walvis Bay, Swakopmund, Arandis, and Henties Bay. This region boasts a coastline that spans more than 1,500 kilometres. The spatial arrangement of the central coastal area and its constituent towns is visually depicted in Figure 6.

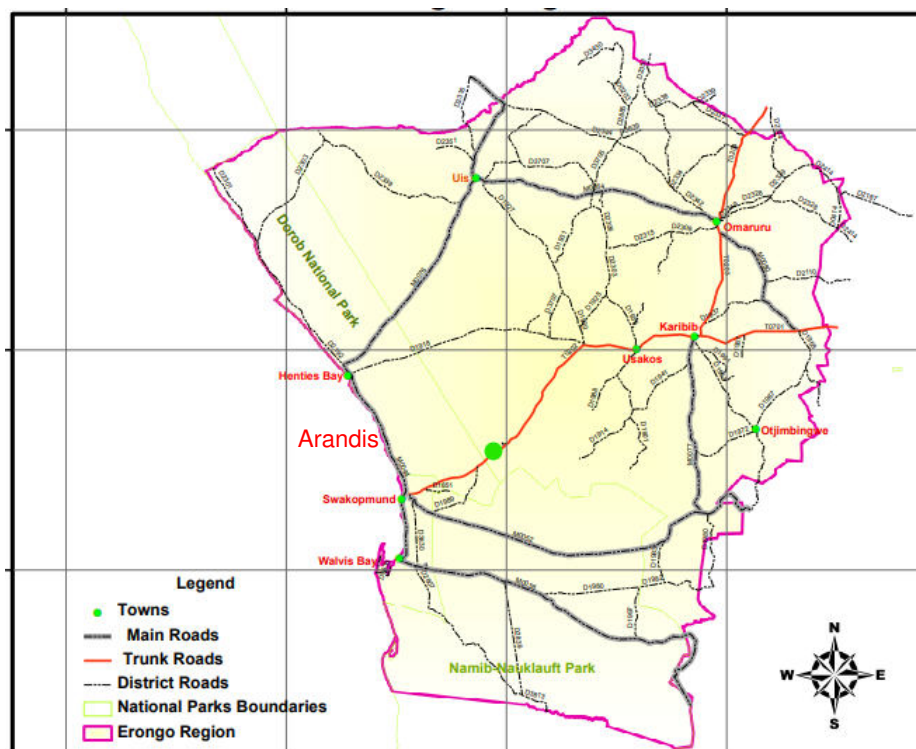


Figure 6: Central Coastal Towns

The coastal tourism sector in Namibia has witnessed substantial expansion, emerging as a prominent contributor to employment generation and economic revenue. The mining industry in Namibia plays a crucial role in generating employment opportunities and contributes significantly to the country's gross domestic product (GDP). The Comprehensive National Assessment (CNA) is of considerable importance due to the involvement of diverse stakeholders, such as municipalities and their inhabitants, mining industries, tourism enterprises, and other relevant parties. It functions as both a primary contributor and an enabler for the presence of all sectors across the nation.

5.2 Landscape and Soils

The study area exhibits distinct geographical features, including flat expanses, dry channels, riverine valleys, and elevated crests. The plains and hills are mostly distinguished by the

prevalence of quartz gravel and other forms of rock debris, whereas sand is predominantly observed in the rivers and washes. The prevailing soil composition in the region primarily comprises shallow lithosols. Crust formation takes place in areas where gypsum and other salts are abundant in close proximity to the surface. The occurrence of gypsisols, which are soils rich in gypsum, and the existence of gravel plains in the region contribute to the favourable conditions for the development of extensive lichen fields.

5.3 Surface and ground water

One of the prominent hydrological features observed in the Wlotzkasbaken Henties Bay region is the existence of the Omaruru River, which flows through the area and subsequently empties into the Omdel Dam prior to reaching the ocean. The estimated catchment area of the Omaruru River is more than 13,100 square km. The physical range of the area in question encompasses the Etjo Mountain, which is situated at an altitude of 2,080 metres above sea level, extending to Henties Bay in the coastal region. The length of this particular land expanse reaches approximately 330 kilometres.

The Atlantic Ocean, located to the western side of the pipeline route, is an additional notable body of water in close proximity. The spatial distance between the pipeline and the water displays variations within a range of 5 to 15 kilometres.

5.4 Land use

Dorob National Park

The **Omdel – Swakop Short-Term pipeline** is located within the boundaries of the Dorob National Park and Wlotzkasbaken. The Dorob National Park is located in close proximity to the central coastline of Namibia. The park spans an extensive area of 7,800 square kilometres, establishing a designated conservation zone that stretches from the Kuiseb Delta in the southern region to the Ugab River in the northern region. The official designation of the Park as a national park took place on December 1, 2010, in accordance with the Nature Conservation Ordinance No.4 of 1975. The establishment of the Park was driven by the goal of preserving the exceptional Namibian coastline, together with its complex ecosystem that supports a wide range of plant and animal species. The governance of land utilisation within the Dorob National Park is overseen by the Dorob National Park Management Plan.

5.5 Climate

5.5.1 Temperature

The climate prevailing in the central coast of Namibia for most of the year is often characterised by relatively low temperatures, robust winds blowing from the sea towards the land, and frequent overcast conditions. Based on the findings of Mendelsohn et al. (2009), the region has average daily temperatures that range from a minimum of 10°C during the coldest month to a maximum of 24°C during the warmest month. However, it is worth noting that exceptionally low temperatures as low as 2°C have been documented (Mendelsohn et al., 2009). Frost occurrences are infrequent as a result of the close proximity to the coast.

5.5.2 Wind

According to Mendelsohn et al. (2009), prevailing winds in the southern, western, and south-western directions are commonly observed, with their highest intensity typically occurring throughout the late afternoon and early evening. During the winter season, the movement of winds originating from the inland areas results in the transportation of both heat and sand particles, which are then carried over the land and dispersed into the sea.

5.5.3 Moisture

The precipitation patterns in the Namib Desert exhibit a high degree of variability, unpredictability, and spatial heterogeneity. The annual precipitation ranges from 0 to around 100 mm, as reported by Mendelsohn et al. (2009), with a gradual increase from west to east. In regions characterised by minimal rainfall in the western part of the world, the fog that is transported inland by wind as it traverses the frigid Benguela current of the Atlantic Ocean plays a crucial role in providing moisture for several creatures inhabiting dry environments (Mendelsohn et al., 2009).

The frequency of foggy days per annum exhibits a declining trend as one moves towards the eastern direction. Based on the findings of Mendelsohn et al. (2009), it can be inferred that the geographical region under investigation potentially encounters in excess of 100 foggy days per year. Moreover, this study area spans a distance of over 100 kilometres from the coastline, suggesting that fog likely constitutes a significant source of the available moisture. The steep climatic gradient resulting from the spatial and temporal distribution of rain and fog is a significant factor contributing to the presence of many vegetation zones in the Central Namib (Hachfeld, 2000).

5.6 Fauna

The region known as the central coast is classified as part of the Desert Biome according to Irish's (1994) categorization, specifically falling within the Central Desert vegetation type. The soils present in the region are classified as Petric gypsisols and petric calcisols. According to Mendelsohn et al. (2009), intermittent rainfall contributes to the revitalization of plant life, which in turn attracts a significant population of various avian species such as gemsbok, ostriches, sandgrouse, larks, and others.

The presence of coastal fog in this arid region contributes to the sustenance of a wide range of wildlife and flora by providing essential moisture.

5.7 Flora

The flora remains moderately sparse. The vegetation in the area includes flora such as: desert sedge (*Carex resectans*), smooth lovegrass (*Eragrostis curvula*), dollar bush (*Zygophyllum stapffii*), brakspekboos (*Zygophyllum simplex*), welwitschia (*Welwitschia mirabilis*), dune grass (*Elymus mollis*), feather-top (*Pennisetum villosum*) and ostrich grass (*Struthio camelus*) (Mendelsohn, et al., 2009).

6. RESPONSIBLE PARTIES

The implementation of the EMP requires a multitude of administration of various role players, each with specific responsibilities to ensure that the proposed infrastructure is planned and designed, constructed, operated, and maintained in an environmentally sound manner.

Table 1: Project Team

NO.	SPECIFIC PROJECT ROLE	ADDRESS AND CONTACTS
1.	Proponent	<p>NamWater Ltd. Project Manager: Mr. Lazarus Muhimba Tel: +264 (61) 71-2129 Mobile: +264811222855 Email: MuhimbaL@namwater.com.na</p> <p>Environmental Department: Mrs. Jolanda Kamburona Tel: +264 (61) 71-2105 Email: KamburonaJ@namwater.com.na</p>
3.	Permitting Authority	<p>Ministry of Environment and Tourism Directorate of Wildlife and National Parks – Erongo Regional Office Chief Control Warden for Dorop National Park Mr. Riaan Solomon Mobile: +264 812527474 Email: Riaan.Solomon@mef.gov.na</p> <p>Ms. Frieda Shikongo Warden: Dorob National Park Mobile: +264 813723287</p>

Proponent (NamWater)

NamWater will have a crucial role in ensuring the effective implementation of this Environmental Management Plan (EMP). The implementation of this Environmental Management Plan (EMP) can be accomplished by appointing a project team that will assume responsibility for overseeing its execution throughout the planning and design, construction, and decommissioning stages. The proponent will provide assistance to the Contractor in overseeing and evaluating potential negative environmental, social, and climate effects and hazards that may arise throughout the execution of the Omdel-Swakop Short-Term pipeline project, encompassing construction, operation, maintenance, and decommissioning activities.

The following NamWater Officials will be responsible for:

Resident Engineer (RE)

- Ensuring the fulfilment of the objectives of the Environmental Management Plan (EMP).
- Implement disciplinary measures in instances of violations and failure to adhere to regulations.
- It is imperative to adhere to the environmental principles of avoidance, minimization, mitigation, and rehabilitation as outlined in this Environmental Management Plan (EMP) in order to effectively manage any environmental consequences.
- The primary objective is to establish and uphold occupational health and safety measures, as well as health protection protocols, within the workplace setting. e) It is

imperative to implement suitable monitoring and compliance auditing procedures to ensure adherence to established standards and regulations. f) A crucial aspect is the restoration of the environment to its original state, to the greatest extent feasible.

- Appropriate compliance monitoring is conducted in accordance with the guidelines specified in Sections 8 and 9.
- Handle grievances and complaints according to the specified procedures indicated in Appendix A.

Environmentalist – in collaboration with the RE and Project Team

- Ensure adherence to the Environmental Management Plan (EMP)
- Attend the project site inspections and meetings.
- The objective is to establish and uphold occupational health and safety measures, as well as promote health protection within the workplace.
- It is imperative that all workers and contractors are knowledgeable about the importance of safeguarding and conserving the cultural legacy of Dorob National Park.
- The responsibility includes acknowledging and addressing complaints received from the Responsible Entity (RE) and the Environmental Compliance Officer (ECO).
- Address and resolve complaints or grievances that have been elevated to their attention.
- Inform the Department of Water Affairs (DWA) and Ministry of Environment, Forests, and Tourism (MEFT) of any proposed modifications to the project's scope and potential environmental consequences.
- It is advisable to maintain a comprehensive documentation of emergency situations and implement appropriate remedial measures in accordance with the guidelines outlined in Section 8.
- The objective is to facilitate and facilitate effective and inclusive involvement with stakeholders affected by the project at all stages of its implementation, particularly on matters that may have an impact on them.
- In order to guarantee the timely, comprehensible, accessible, and suitable disclosure of project information pertaining to environmental and social risks and impacts, it is imperative to implement measures.

Area Manager- in the capacity of the primary authority overseeing the operation of the Omdel-Swakop Temporary pipeline will be responsible for supervising the execution of the EMP throughout the operational and maintenance stages. The Area Manager is responsible for ensuring:

- It is imperative to ensure that a duplicate of this EMP is consistently maintained at the designated location.
- All personnel responsible for the operation and maintenance of the Omdel-Swakop Temporary pipeline should possess knowledge of this EMP and receive concise training as needed.
- In order to guarantee and facilitate the maintenance of occupational health and safety, as well as the protection of health within the workplace;
- It is imperative that all workers and contractors possess a comprehensive understanding of the need of refraining from engaging in any type of discriminatory behaviour towards their fellow colleagues.
- In order to ensure the safety and well-being of individuals involved in a project, it is imperative to provide protection for all categories of workers, including those who may be considered vulnerable such as women, persons with disabilities, children of working age, migrant workers, contracted workers, community workers, and primary supply workers, as deemed necessary.

- In order to advance the principles of equitable treatment, non-discrimination, and equal opportunity for workers involved in a project, it is imperative to take appropriate measures.
- It is imperative to ensure that all workers and contractors are duly informed about the importance of refraining from any actions that may contribute to the exacerbation of current conflict dynamics.
- It is imperative that all personnel and contractors possess a comprehensive understanding of the significance of safeguarding and conserving the cultural heritage of Dorob National Park.
- Individuals are informed of the need of denouncing coerced labour and child labour, prohibiting discriminatory practises in relation to employment and occupation, and promoting the freedom to form associations and engage in collective bargaining, as mandated by domestic legislation.
- Evaluation of the environmental management practises conducted on-site and the employees' adherence to the Environmental Management Plan (EMP).
- Conduct compliance monitoring as outlined in Sections 8 and 9 of this EMP.
- In order to effectively mitigate emergency events, it is crucial to establish and implement appropriate measures.
- Keep and maintain a comprehensive log of emergency situations and implement appropriate remedial measures.
- All operational and maintenance activities adhere to NamWater's environmental code of conduct.
- Establish a system that allows project workers to easily voice their workplace concerns.
- Grievances should be addressed in accordance with the procedures specified in Appendix A.
- In the event of a violation, it is necessary to implement suitable disciplinary measures against the employees responsible for pipeline maintenance at Omdel-Swakop Temporary pipeline.
- To mitigate the potential impact of project-related traffic and associated road safety risks, as well as the spread of diseases and exposure to hazardous materials within the community.
- To facilitate and promote effective and inclusive involvement of project-affected stakeholders throughout the entire duration of the project, particularly on matters that have the potential to impact them.
- To guarantee the timely, comprehensible, accessible, and suitable disclosure of project information regarding environmental and social risks and impacts.

Contractor and sub-contractors

The Contractor, regardless of whether they are internal or external, is obligated to carry out their activities in a manner that minimises disruption to the existing amenities, both natural and man-made, in compliance with all applicable legal requirements. The Contractor must exercise caution to avoid causing permanent harm to the environment. The Contractor is required to ensure that appropriate measures are taken to provide comprehensive training to all members of their workforce (in collaboration with NamWater), as well as their supervisory staff, regarding the pertinent environmental legislation and protection obligations. The Contractor is required to enhance these procedures by implementing prominently placed notices and signs in strategic areas to serve as reminders for personnel regarding their environmental responsibilities.

The Contractor is required to ensure that all of their employees, as well as those employed by their Sub-Contractors, participate in an Environmental Awareness Training Course. The course will be designed in a manner that guarantees that participants:

- Acquire a basic understanding of the key environmental features on the site and its immediate environment;
- Become familiar with the environmental controls contained in the EMP;
- To ensure and support occupational health and safety as well as health protection in the workplace;
- Are made aware of all protected areas (Dorob national Park Regulations) and that the trapping, poisoning, and/or shooting of animals is strictly forbidden. No domestic pets are allowed on site;
- Are informed that natural features (e.g. rock formations) are not defaced or marked for survey or other purposes unless agreed beforehand with the engineer and natural water sources (e.g. streams) are not allowed to be used for the purposes of swimming, personal washing, and the washing of machinery or clothes;
- To promote the fair treatment, nondiscrimination and equal opportunity of project workers
- To protect project workers, including vulnerable workers such as women, persons with disabilities, children (of working age) and migrant workers, contracted workers, community workers and primary supply workers, as appropriate.
- Are made aware to avoid all forms of discrimination of their employees;
- Are made aware to avoid negatively influencing existing conflict dynamics;
- Are made aware to protect and preserve the Dorob National Park's cultural heritage;
- Are made aware of the need to conserve water and minimise waste;
- Receive pertinent, written instructions regarding compliance with the relevant environmental management requirements (viz. typical environmental "do's" and "don'ts");
- Are made aware of any other environmental matters as deemed necessary by the Engineer / ECO.
- Are made aware to condemn forced labour and child labour, ban discrimination in respect of employment and occupation, and support the freedom of association and the right to collective bargaining in accordance with national laws;
- Are made aware of the importance of preserving archaeological sites.
- Receive detailed training in site health and safety requirements, emergency responses and site evacuation procedures in terms of the Contractor's health and safety plan;
- Are made aware of NamWater's Code of Conduct;
- HIV/AIDS awareness training and the training should indicate where condoms are freely available on site;
- Awareness around birth control and the potential long-term risks associated with casual sex;
- Are made aware that prostitution shall not be tolerated in the construction camp;
- Are aware that a copy of the EMP is readily available on site and that all site staff are aware of the location and have access to the document;
- Are aware of the requirements of any approved Method Statements that have bearing on their activities, and where necessary, any specialised training required to ensure compliance with the approved Method Statements has been provided; and
- Are informed that employee information posters, outlining the environmental "do's" and "don'ts" (as per the environmental awareness training course) will be placed at prominent locations throughout the site.
- To provide project workers with accessible means to raise workplace concerns.

- Handle grievances in the prescribed manners as outlined in Appendix A.
- To avoid or minimize community exposure to project-related traffic and road safety risks, diseases and hazardous materials.
- To ensure that the safeguarding of personnel and property is carried out in a manner that avoids or minimizes risks to the project-affected communities.
- To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle on issues that could potentially affect them.
- To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format.

The Contractor upon receiving this EMP, should ensure compliance to this EMP by:

- Ensure that a copy of this EMP is always kept on site.
- Undertaking their activities in an environmentally sensitive manner and within the context of this EMP.
- To have in place effective measures to address emergency events.
- Keeping a record of emergencies and taking corrective actions as outline in this EMP.
- Taking appropriate disciplinary actions against their employees in case of transgression.

Environmental Control Officer

A suitably qualified and experienced Environmental Control Officer (ECO) shall be appointed by the Contractor prior to the commencement of construction to ensure that the mitigation and rehabilitation measures are implemented and to ensure compliance with the provisions of the EMP.

The ECO is responsible to oversee and monitor compliance with and implementation of the EMP:

- Liaison with the community, NamWater, Consulting Engineer, Resident Engineer and Environmental Authorities;
- Liase with stakeholders from neighbouring communities in order to ensure that the project does not adversely impact on the living conditions of communities, in particular indigenous peoples and other vulnerable groups, as well as to ensure the rights, living conditions and values of indigenous peoples;
- Monitoring of all the Contractor's activities for compliance with the various environmental requirements contained in this EMP;
- To promote the fair treatment, nondiscrimination and equal opportunity of project workers
- Monitoring of all Contractor's activities for compliance with occupational health and safety requirements as well as health protection in the workplace;
- Monitoring of all Contractor's activities to avoid or minimize community exposure to project-related traffic and road safety risks, diseases and hazardous materials.
- Ensuring that the requisite remedial action is implemented in the event of non-compliance;
- Ensuring the proactive and effective implementation and management of environmental protection measures;
- Ensuring that a register of employee and public complaints is maintained by the Contractor and that any and all employee and public comments or issues are appropriately reported and addressed;
- Routine recording and reporting of social and environmental activities, incidents and non-compliance on a monthly basis;

- To have in place effective measures to address emergency events. Keeping a record of emergencies and taking corrective actions as per Section **Error! Reference source not found.**
- To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle on issues that could potentially affect them.
- To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format.
 - Notifying the Environmental Authorities immediately of any events or incidents that may cause significant environmental damage or breach the requirements of the EMP; and
 - Presenting Environmental Awareness Training courses to the Contractor's entire team of workers prior to commencing with construction. All new appointees should also receive the training.
 - The ECO shall be at the site with construction team to ensure compliance.
 - Bi - Monthly compliance reports shall be submitted to the Resident Engineer and NamWater Project Management Team. The compliance report shall address all issues of non-compliance, remedial action recommended and implementation thereof. It is recommended that an Environmental Audit Report be carried out 6 months after construction has been completed and submitted to the Environmental Authorities and NamWater.

7. CONSTRUCTION PHASE

7.1 Introduction

The EMP is to be ***included into all Tender and Contract documentation to ensure that the Contractor is aware of his obligations and is able to price the implementation of these requirements accordingly.*** Failure to comply with these requirements could result in penalties or otherwise hold the Contractor accountable for any damages arising from irresponsible behavior or non-compliance with the requirements. This ensures that identified environmental issues receive adequate attention during the planning and construction phase.

7.2 Scope

The general principles contained within this EMP shall apply to all construction activities. All construction activities shall observe any relevant environmental legislation and in so doing shall be undertaken in such a manner as to minimise impacts on the natural and social environment. Best practice shall apply where this EMP does not describe the management measures for a construction activity. The ECO must be consulted should there be no management measures in this EMP for a specific construction activity or where there is uncertainty as to how the measures in this EMP should be implemented. In such an instance the ECO must determine the Best Available Technique(s) to avoid and/ or minimise potential impacts that an activity might have as per available best practice guidelines.

7.3 General

NamWater, as the client, is responsible for:

- o Appointing a qualified independent ECO;
- o Ensuring that the objectives of the EMP are given effect by including it in all contract documentation;
- o Ensuring that all environmental impacts are managed in accordance with the EMP;
- o Ensuring that all monitoring and compliance auditing occurs in line with the EMP;
- o Ensuring that the environment is rehabilitated as far as practical to its natural state or existing land use practices; and
- o Any environmental damage, pollution, pumping and treatment of extraneous water or ecological degradation as a result of activities both in and outside the site boundaries.

With regard to the above, the Contractor shall conduct his/her activities so as to cause the least possible disturbance to the existing amenities, whether natural or man-made, in accordance with all the current statutory requirements. Special care shall be taken by the Contractor to prevent irreversible damage to the environment. The Contractor shall take adequate steps to educate all members of his/her workforce as well as his/her supervisory staff on the relevant environmental laws and protection requirements. The Contractor shall supplement these steps with prominently displayed notices and signs in strategic locations to remind personnel of environmental obligations.

A suitably qualified independent ECO shall be appointed by NamWater to undertake the following tasks:

- o Liaison with Contractor, Interested and Affected Parties (I&APs); and Engineer regarding environmental matters;
- o Monitoring of all of the Contractor's activities for compliance with the various environmental requirements at regular intervals;
- o Routine environmental auditing and reporting of the Contractor's performance against the EMP;

- o Reporting of environmental incidents and routine reporting of environmental issues associated with construction activities to NamWater, the Contractor and any relevant environmental authority; and
- o Identifying environmental non-conformances and initiating measures to remedy such issues, including the institution of fines against the Contractor.

The Contractor shall construct and/ or implement all the necessary environmental protection measures in each area before any construction work may proceed. The Engineer/ ECO may suspend the Works at any time should the Contractor, in the Engineer/ ECO's opinion, fail to implement, operate or maintain any of the environmental protection measures adequately. The costs of such suspension shall be to the Contractor's account.

7.4 Planning And Design

The Design Engineers must take cognisance of the outcomes and recommendations of the EMP. NamWater and the Engineer must ensure that this EMP is included in the briefing documentation to the Contractor (to be appointed). The Engineer must advise the Contractor to familiarise himself with the EMP and ensure that adequate resources are made available to implement the requirements of the EMP.

7.4.1 Specific recommendations to be incorporated into the planning phase

The following specific recommendations must be considered in the detailed planning of the proposed project:

7.4.1.1 Turning Circles

The need for turning circles is not expected. However, should they be required, they should be sized as per Figure 7 and limited to disturbed sections.

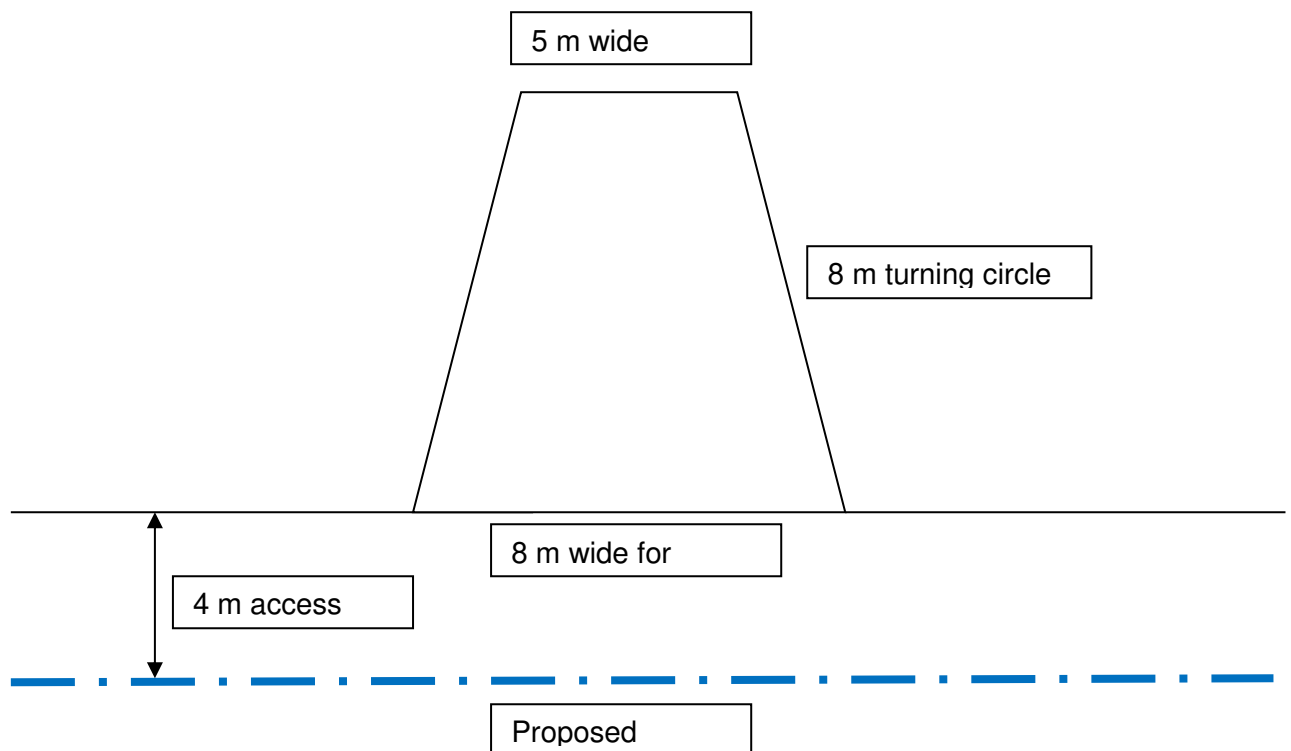


Figure 7: Turning Circles

7.5 ENVIRONMENTAL AWARENESS

7.5.1 Environmental, health and safety induction course

The Contractor is responsible for informing employees and Sub-Contractors of their environmental obligations in terms of the EMP and for ensuring that employees are adequately experienced and properly trained in order to execute the works in a manner that will minimise environmental impacts.

The Contractor shall ensure that all his employees, and those of his Sub-Contractors, attend an Environmental, Health and Safety Induction Course. This course shall be structured to ensure that attendees:

- o Acquire a basic understanding of the key environmental features on the site and its immediate environs;
- o Become familiar with the environmental controls contained in the EMP;
- o Are made aware of all protected areas and that the trapping, poisoning, and/ or shooting of animals is strictly forbidden. No domestic pets are allowed on site;
- o Are informed that natural features (e.g., rock formations) are not defaced or marked for survey or other purposes unless agreed beforehand with the engineer. Furthermore, natural water sources (e.g. streams) are not allowed to be used for the purposes of swimming, personal washing, and the washing of machinery or clothes;
- o Are made aware of the need to conserve water and minimise waste;
- o Receive pertinent, written instructions regarding compliance with the relevant environmental management requirements (viz. typical environmental “do’s” and “don’ts”);
- o Are made aware of any other environmental matters as deemed necessary by the Engineer/ ECO;
- o Are made aware of the importance of preserving archaeological sites;
- o Receive detailed training in site health and safety requirements, emergency responses and site evacuation procedures in terms of the Contractor’s health and safety plan;
- o Are made aware of NamWater’s Code of Conduct;
- o Are aware that a copy of the EMP is readily available on site and that all site staff are aware of the location and have access to the document;
- o Are aware of the requirements of any approved Method Statements that have bearing on their activities, and where necessary, any specialised training required to ensure compliance with the approved Method Statements has been provided; and
- o Are informed that employee information posters, outlining the environmental “do’s” and “don’ts” (as per the environmental awareness training course) will be placed at prominent locations throughout the site.

The Environmental, Health, and Safety Induction Course should be conducted by the ECO and Contractor’s Health and Safety officer, who shall provide the site staff with an appreciation of the project’s environmental requirements, and how they are to be implemented. All new staff coming onto site after the commencement of construction activities must also attend the Environmental, Health and Safety Induction Course, and refresher courses should be undertaken on a quarterly basis. A detailed record of all training sessions, including a list of attendees must be compiled by the Contractor and submitted to the Project Manager on a regular basis.

The initial Environmental, Health, and Safety Induction Course shall be held within 14 days from the site mobilisation date, and subsequent courses shall be arranged for all new employees arriving after the initial training course, also within 14 days of their arrival.

The Contractor shall provide a suitable venue with necessary facilities and ensure that all employees attend the environmental, health and safety induction course. The course shall be held in the morning during normal working hours. No more than 30 people shall attend each course and the Contractor shall allow for sufficient sessions to train all personnel. The Contractor shall provide proof of attendance by all of his employees in the form of a signed attendance register.

7.5.2 Toolbox talks

Environmental, health and safety issues specific to each area of the works, shall form part of the daily toolbox talks in each area. These can be short 10–15 minute discussions on the environmental sensitivities of the general area and/ or the specific sections that would be worked on, on that day. The foreman responsible will provide feedback to his staff on their day-to-day environmental performance and address issues requiring attention and specific actions required. A synopsis of the topics discussed at each area shall be recorded on a register and submitted to the ECO on regular (typically weekly) basis. Environmental matters shall be dealt with in toolbox talks on a regular basis (typically at least once a week).

7.5.3 Safety of the public

The Contractor shall take all reasonable measures to ensure the safety of people in the surrounding area. Where the public could be exposed to danger by any of the Works or site activities, the Contractor shall provide flagmen, barriers, and/ or warning signs in English, all to the approval of the Engineer/ ECO.

All unattended open excavations shall be adequately demarcated (fencing shall consist of orange mesh). Adequate protective measures must be implemented to prevent unauthorised access to the Working Area. No firearms shall be permitted on site.

The Contractor shall implement appropriate measures to limit any adverse social impacts associated with the accommodation of a construction workforce on the local communities. The following mitigation and management measures are prescribed in this regard:

- o Measures to combat HIV/ AIDS and other social ills:
 - o NamWater should ensure the health of its employees and their dependants by adopting rigorous health programmes, which should, at a minimum, include programmes to combat HIV/ AIDS and tuberculosis (TB);
 - o The Contractor should make HIV/ AIDS and Sexually Transmitted Diseases (STD) Awareness and Prevention programmes a condition of contract for all suppliers and Sub-Contractors;
 - o The Contractor should provide an adequate supply of free condoms to all workers;
 - o A voluntary counselling and testing programme should be introduced during the construction phase and continued during operations; and
 - o Access at the construction site and camp should be controlled to prevent sex workers from either visiting and/ or loitering at or near these locations.

- o Measures to prevent crime:

- o Construction workers shall be clearly identifiable by wearing proper construction uniforms displaying the logo of the construction company. Construction workers could also be issued with identification tags in order to gain access to the construction site;
 - o All construction workers shall at all times wear the required Personal Protective Equipment (PPE); and
 - o The Contractor should establish clear rules and regulations for access to the construction site and offices to control loitering. Consultation should occur with the local Namibian police branch to establish standard operating procedures for the control and/ or removal of loiterers.
- o Measures to reduce traffic related incidents:
 - o Ensure that road junctions have good sightlines;
 - o Transport the materials in the least amount of trips as possible, whilst being careful of overloading vehicles;
 - o Limit speed both on and off the site;
 - o Adhere to the speed limit; and
 - o Implement traffic control measures where necessary.

7.5.4 Human resource and opportunities management

Job creation, inward migration of workers and accommodation of a workforce within a small community have the potential to result in significant social impacts. NamWater and the Contractor must approach human resource management in a careful, cooperative and considered fashion so as to enhance the positive impacts, whilst minimising negative impacts associated with construction projects.

Given the location of the Swakopmund and Henties Bay Towns, the communities in both towns should be given special consideration in terms of the benefits arising from the project. In order to enhance the benefits of employment creation for these communities, it is recommended that the following measures be implemented:

- o The Contractor shall establish a formal and organised recruitment process;
- o The Contract shall be encouraged to employ local labour where possible;
- o The Contractor shall be encouraged to recruit Namibian labourers;
- o Recruiting by the Contractor must be conducted through a central office and no on-site hiring should be allowed;
- o The Contractor shall inform job seekers that they are hired for a contract period only;
- o The Contractor shall be encouraged to source construction materials locally as far as possible; and
- o The Contractor shall be encouraged to make use of local sub-contractors.

7.5.5 Working times

The Contractor shall restrict construction activities to the hours of 06h30 - 18h00 during summer and 07h00 - 17h30 during winter on Mondays to Saturdays and no work will be permitted on Sundays or public holidays.

7.6 METHOD STATEMENTS

Any Method Statements required by the Engineer/ ECO or called for by the Project Specification shall be produced within such reasonable time as specified by the Engineer/ ECO or as stipulated in the Project Specification. Please refer to **Appendix B** for a generic example of a method statement. The Contractor shall not commence the activity until the Method Statement has been

approved, except in the case of emergency activities. The Contractor shall allow the Engineer/ ECO a one week period for the review and approval of the Method Statement. Such approval shall not be unreasonably withheld.

The Engineer/ ECO may require changes to a Method Statement if the proposal does not comply with the Specification or if, in the reasonable opinion of the Engineer/ ECO, the proposal may result in, or carries a greater risk of, damage to the environment in excess of that which can be tolerated.

Approved Method Statements shall be readily available on the site and shall be communicated to all relevant personnel. The Contractor shall carry out the works in accordance with the approved Method Statement. Approval of the Method Statement shall not absolve the Contractor from any of his obligations or responsibilities in terms of the Contract or any other law except where this is specifically stated in the method statement.

Method Statements that shall be provided by the Contractor 14 days prior to the mobilisation on site include:

1. Mobilisation plan, covering:
 - a. The location and layout of all offices, storage containers, gates and fences, fuel storage areas and protection bunds, material lay-down areas, ablution facilities, carpentry areas, hazardous chemical storage facilities, wash bays, workshops and works service and maintenance areas, oil separators and grease traps, storm-water layout, first aid facilities, recess, training, eating and meeting areas, central waste storage areas, access/ haul roads and any other facilities associated with the Contractor's yard;
 - b. Security and access control to the site;
 - c. The design and location of all waste storage facilities, in particular the central waste storage area;
 - d. The central waste storage area shall include separate, weather proof, water-tight vessels/ skips for the disposal of hazardous waste and contaminated soil recovered during spills and for general waste respectively;
 - e. The system of collection and disposal of wastes, including the name and location of the point of final disposal, to an appropriate landfill site;
 - f. Initiatives for the control and recovery of litter on and around the Site and Contractor's yard;
 - g. Fuels and fuel spills: Methods of refuelling vehicles and details of methods for fuel spills and clean-up operations;
 - h. Sedimentation and Erosion Control: Sedimentation and erosion control of bulk earthworks and the management of sediment into rivers;
 - i. Stormwater management: Provisions to manage stormwater during the construction phase;
 - j. Method of undertaking blasting;
2. Operational and rehabilitation plan, covering:
 - a. Procedure for grubbing of the works and handling, stockpiling and disposal of the debris arising from the excavation operations;
 - b. Measures to be used to protect the topsoil stockpiles against contamination or erosion;

- c. Measures used to protect cleared areas from erosion, windblown dust and suspended solid contaminated runoff;
- d. Method to be used for backfilling, shaping, spacing and shape of erosion protection berms and the redistribution of stockpiled topsoil (care to be taken that topsoil is not over diluted with sub-soil); and
- e. Control of alien invasive species. It is encouraged that concurrent rehabilitation practices are used where possible.

7.7 ENVIRONMENTAL CONSIDERATIONS PERTAINING TO SITE LAYOUT

7.7.1 Employee eating and recess areas

The Contractor shall identify a suitable area, which is shaded and away from construction noise and dust, where employees can eat and take work recesses in relative comfort. The eating areas shall be provided with scavenger proof rubbish bins which are to be emptied into the central waste storage vessel/ skip daily. Potable water and other sanitary conveniences shall also be located within reasonable range of the designated eating area. The Contractor shall prevent his employees from eating or recessing anywhere else but in the designated eating area.

7.7.2 Security Guards

Security guards that would look after construction equipment, materials and plant at night time shall not be allowed to leave the construction yard. They must be provided with an office to shield them from the weather. They shall be bound by the conditions contained in this EMP. Security guards must therefore be made aware of the conditions of the EMP, especially with relation to no-go areas, fires on site (refer to chapter 7.7.14), health and safety and protection of fauna and flora (refer to section 7.8).

7.7.3 Ablution facilities

Temporary/ portable toilets shall be supplied by the Contractor for the workers at a minimum ratio of 1 toilet per 15 workers and be within walking distance of the work area. The toilets shall be placed at appropriate locations to the approval of the Engineer/ ECO. The toilets shall be located along the pipeline route as construction takes place, but not closer than 50m to water resources (e.g., vegetated drainage lines). Toilets shall not be located in depressed areas where they may be subject to flooding. Toilets shall be kept in a good state of repair and shall be serviced at intervals sufficient to ensure that they are kept in clean and sanitary condition. The Contractor shall ensure that no spillage occurs when the toilets are cleaned or emptied and that the contents are removed from site. Discharge of waste from toilets into the environment is prohibited. Each toilet shall be stocked with toilet paper at all times. All toilets shall be secured to the ground to ensure that they do not overturn during high winds or for any other reason.

Washing, whether of the person or of personal effects, and acts of excretion and urination are strictly prohibited, other than at the facilities provided.

7.7.4 Site division and site demarcation

The Contractor shall restrict all his activities, materials, equipment and personnel to the designated Site (as must be indicated on the mobilisation plan – refer to section 7.6). “No-go” areas shall be demarcated using either danger tape or orange mesh. All areas outside of the demarcated site shall be deemed as “no-go” areas for all construction personnel and equipment.

The Contractor shall ensure that the clearance of vegetation (if required) is restricted only to that required to facilitate the execution of the works. Non-conformances related to over-clearance of

vegetation shall be regarded as a serious offence and dealt with to the full extent of these specifications. A preventative approach to rehabilitation is emphasised, site clearance shall occur in a planned manner, over- or accidental clearance will be prevented.

The Contractor shall peg the route for the proposed pipeline before commencing with any clearing operations. These demarcations shall be used by the clearing teams as a guide to control and prevent accidental over clearance of vegetation. No clearing of vegetation will commence until the alignment is finalised and commencement authorised by the ECO/ Engineer.

7.7.5 Access, traffic and haul roads

The Contractor shall be held responsible for the control of all project related traffic, including that of his suppliers, in ensuring that vehicles associated with the project remain on designated routes and within the designated working times. Construction traffic shall be controlled to ensure minimal disruption to normal road users. All existing access roads that may be affected during construction shall be kept open and in a good state of repair, where this is not possible, unobstructed and safe alternative access routes through the Works must be provided under the guidance of the ECO.

The following mitigation measures are further proposed to limit the impact of traffic in the area:

- o Access roads shall be widened to the minimum width required and should not exceed 5m;
- o New roads shall not be constructed if the quality of existing roads deteriorates. Existing roads shall be repaired and maintained for the duration of the construction phase and beyond;
- o Road construction methods should ensure good road surfaces to preclude vehicles driving off road to find smoother surfaces with less corrugations or potholes;
- o The area to be cleared for road construction shall be as small as possible;
- o Road surface shall be regularly assessed and upgraded where appropriate;
- o No off-road driving shall be allowed except within the pipeline construction corridor (i.e. 15m) as to not degrade adjacent areas;
- o No operator will operate any equipment when he is under the influence of alcohol;
- o Make sure all vehicles are roadworthy. Repair faulty brakes, exhausts etc. immediately (preferably offsite, if not offsite the ground surface must be protected by impermeable material and/ or drip trays);
- o Ensure that road junctions have good sightlines;
- o Transport the materials in the least amount of trips as possible;
- o Limit speed both on and off the site;
- o Adhere to the speed limit;
- o Implement traffic control measures where necessary.
- o Good driving and adherence to safety rules shall be adhered to at all times;
- o Drivers must keep their headlights on when driving on gravel roads;
- o Drivers must have the correct licence and training for the vehicles they are driving; and
- o The following minimum standards for access roads should be followed:
 - Enter and exit roadways and construction areas should be demarcated at the entrances;
 - Erect signage to warn motorists about construction activities and heavy vehicle movement where appropriate;
 - Use 3-point turns and not U-turns and confine turning to the road; and
 - Prevent shortcuts between roads.

No new parking bay, haul or access road or passage of any sort shall be opened or be caused to be opened without the prior consent of the Engineer/ ECO. Establishing new borrow pits are strictly prohibited. Any contraventions of this clause shall result in penalisation.

7.7.6 Solid waste management

The Contractor shall provide sufficient number of scavenger proof rubbish bins with secured lids. Rubbish bins shall always be placed in pairs, to ensure that one is always present while the other is being emptied. As a minimum, rubbish bins shall be located at every point of entry/ exit to the site, any building, work area, ablutions facility or recess area. Areas where rubbish is likely to be generated in higher quantities shall be equipped with additional rubbish bins according to the activities occurring there and the volume of waste being generated. Areas requiring additional rubbish bin will include for example:

- o Training and meeting facilities;
- o Workshops;
- o Stores;
- o Canteens and eating areas;
- o Materials laydown areas;
- o Any work areas where outfitting (electrical, plumbing, mechanical) of structures is occurring (as required);
- o Any mobile teams carrying out work away from the main site infrastructure, for example pipe or electrical installation teams, road building and maintenance teams, etc., shall carry a rubbish bin with them at all time and return all waste collected to the central storage area at the end of a day's work; and
- o Any other area where an accumulation of litter and rubbish is noted or as instructed by the ECO.

No waste materials, including domestic, organic or construction wastes shall be burnt, dumped or buried on the Site. Bins shall be emptied daily or as required. The waste may be stored temporarily on site in a central waste area that is weather and scavenger proof, as approved by the Engineer/ ECO. The Contractor shall, at his own cost, make available the time and resources required in recovering any litter or other wastes that have accumulated or have been dispersed as a result of his activities on the Site. The ECO shall monitor this strictly and institute strict penalties in the event of non-compliances.

The central waste storage vessel/ skip shall be emptied weekly or as necessary. All solid waste shall be disposed of at the closest registered waste disposal site. A copy of the waste disposal certificates shall be submitted to the Engineer/ ECO for record purposes.

7.7.7 Fuel and oil

The Contractor shall ensure that all liquid fuels are stored in tanks or mobile bowsers with lids that are kept firmly shut. The tanks or mobile bowsers must be in good working order (i.e. not leaking). The Contractor shall ensure that there is adequate fire-fighting equipment at the fuel storage areas. The tanks or bowsers shall be situated on a smooth impermeable surface (concrete slab or 250 micron plastic sheeting covered with at least 50 mm of sand) with an earth bund. The impermeable lining shall extend to the crest of the bund. The volume of the bunded area shall be 130% the volume of the combined tank volumes stored therein. Provision shall be made for refuelling at the fuel storage area, by protecting the soil with an impermeable surface (similar to that used for the storage area itself). The tanks and/ or bowsers shall be inspected

daily for any leaks. If they are leaking, either the leaks must be fixed immediately or the bowser/ tanks must be replaced.

The Contractor shall prevent unauthorised access to the fuel storage area. No smoking shall be permitted in the vicinity of the fuel storage area. The Contractor shall ensure that there are adequate fire-fighting provisions located at the fuel storage area.

Should a mobile fuel bowser be used, all refuelling shall occur with appropriate measures in place to prevent spillages; these may include the use of drip trays, funnels, non-drip dispensing nozzles, and any other similar device. Regardless of the preventative measures in place, all mobile fuel bowsers shall carry a spill-kit that is adequately sized to contain at least a 200 litre spill, at all times.

7.7.8 Equipment maintenance and storage

All vehicles and equipment shall be kept in good working order and shall be operated by designated and competent operators. Leaking or damaged equipment shall be repaired immediately or removed from the Site. Where emergency, *in situ*, maintenance operations are required the Contractor shall ensure that the soil or vegetation does not become contaminated. Drip trays shall be provided in construction areas for stationary and parked plant as well as for the emergency servicing of vehicles. Drip trays shall be inspected and emptied daily, or as required. The contents of the drip trays shall be disposed of at an appropriately authorised facility and proof thereof shall be submitted to the Engineer/ ECO.

The washing of equipment shall be restricted to urgent or preventative maintenance requirements only during which the use of detergents for washing shall be restricted to low phosphate and nitrate containing, low foaming type detergents. Washing of equipment will only be allowed in a wash bay, at the site camp, approved by the Engineer/ ECO.

The Contractor shall ensure that oil and lubricant containers are stored in an area where the ground has been protected. The containers shall be inspected regularly to ensure that no leakage occurs. When oil/ lubricants are dispensed, the proper dispensing equipment shall be used, and the storage container shall not be tipped in order to dispense the oil/ lubricant. The dispensing mechanism of the oil/ lubricant storage container shall be stored in a waterproof container when not in use. The Contractor shall take all reasonable precautions to prevent accidental and incidental spillage during the use of oils.

In the event of oil/ lubricant or other hazardous spill, the source of the spillage shall be isolated, and the spillage contained. The Contractor shall clean up the spill by removing the contaminated soil to the hazardous waste vessel/ skip and the application of absorbent material to the affected area. Treatment and remediation of the spill area shall be undertaken to the reasonable satisfaction of the Engineer/ ECO.

7.7.9 Stockpiling and stockpile areas

Plant (i.e. machinery) and materials shall be stored within the demarcated construction camp or batching areas. Where this is not feasible, the Engineer/ ECO will identify additional sites for stockpiling within the Working Area. Where possible, stockpiled materials shall be stored off the ground on scaffolding and care shall be taken to minimise disturbance to the vegetation and topsoil.

Soil, sand, and gravel stockpiles shall be convex in shape and shall be located so as to cause minimal disturbance. Stockpiles shall be so placed as to occupy the minimum width compatible with the natural angle of repose of the material, and measures shall be taken to prevent the material from being spread over too wide a surface. The Contractor shall ensure that all stockpiles do not result in the damming of water or run off, or are themselves washed away. Stockpiles shall be placed to not obstruct or pollute any storm water or drainage paths.

7.7.10 Materials

Materials handling, use and storage

The Contractor shall ensure that any delivery drivers are informed of all procedures and restrictions, including “no-go” areas and designated haul routes.

All material shall be stored within the designated Site boundaries and all material stockpiles shall be located no less than 20m from any water resource. The Contractor shall ensure that all material lay-down areas, workshops and stores, including temporary lay-down areas within the Works, are kept in a neat and orderly fashion on a daily interval, and to the satisfaction of the Engineer/ ECO. The Contractor shall set aside the time and resources required to remedy any contraventions of this clause at his own expense.

Materials shall be appropriately secured and covered to ensure safe passage between destinations. The Contractor shall be responsible for any clean-up resulting from the failure by his employees or suppliers to properly secure transported materials.

Hazardous substances

Hazardous chemical substances used during construction shall be stored in secondary containers. The relevant Material Safety Data Sheets (MSDS) shall be available on site. Procedures detailed in the MSDSs shall be followed in the event of an emergency situation. Potentially hazardous substances shall be stored, handled and disposed of as prescribed by the Engineer/ ECO.

The Contractor shall provide a separate weather-proof, impervious vessel/ skip at the central waste storage area for the temporary storage of hazardous, potentially hazardous and contaminated materials. Waste from this vessel/ skip shall be disposed of at a landfill site that is registered to receive such waste. A copy of the Certificate of Disposal issued by the landfill shall be submitted to the Engineer/ ECO after every deposit.

Cement and concrete batching

The batching of concrete shall take place on a smooth, impermeable surface (plastic) and shall be enclosed with a bund and sloped toward a sump to contain any spillages. Concrete batching shall take place at least 20 m away from any water resource, e.g. vegetated drainage lines, to avoid contaminated water and/ or sediment entering the resource. All waste water resulting from batching of concrete shall be contained and disposed of appropriately and shall not be discharged into the environment unless treated to acceptable standard, as determined by the Engineer/ ECO. Where concrete trucks are used, the Contractor shall ensure that dumping of the drum-wash does not occur directly onto the ground. If needed, facilities for the handling of the concrete contaminated wash-water shall be established to the satisfaction of the Engineer/ ECO. Any spillages of concrete or concrete-truck-drum-wash-water shall be cleaned-up immediately and disposed of through the solid waste disposal system.

The Contractor shall take all reasonable measures to prevent the spillage of cement/ concrete during batching and construction operations. During pouring, the soil surface shall be protected using plastic and all visible remains of concrete shall be physically removed on completion of the pour and disposed of as part of the solid waste disposal system. Empty cement bags shall be collected continuously and stored in temporary weatherproof containers, where they are protected from dispersion by wind and shall be disposed of regularly via the solid waste disposal system.

7.7.11 Dust

The Contractor shall take all reasonable measures to minimise the generation of dust as a result of construction activity, to the satisfaction of the Engineer/ ECO. Dust suppression measures shall be agreed upon in consultation with the Engineer/ ECO. Appropriate dust control measures include the following:

- o Construction vehicles shall only use designated roads;
- o Dust carrying materials shall be secured and properly covered on transportation vehicles before they leave the site; and
- o During high wind conditions the contractor must make the decision to cease works until the wind has calmed down.

7.7.12 Noise

The Contractor shall limit noise levels by implementing the following:

- o Install and maintain silencers on machinery;
- o Appropriate directional and intensity settings are to be maintained on all hooters and sirens;
- o No amplified sound shall be allowed on Site other than in Emergency situations; and
- o Drivers and operators are to be instructed to not use their hooters unless absolutely required (i.e. operators of machinery should not use hooters for the purposes of general communication, which is typically seen on construction sites).

7.7.13 Trenching (only where applicable)

Trenches where envisaged shall be demarcated appropriately, using orange mesh, and securely and regularly monitored during operations to ensure that pedestrian (and vehicular) access to these areas is strictly prohibited. Where appropriate, sign boards, alerting pedestrians and road users to the potential dangers presented by the construction activities, shall be erected. The Contractor shall ensure that the time a trench is left exposed is kept to a minimum, and that open trenches are inspected on a daily basis for animals which may have fallen or become trapped. Animals found trapped shall be rescued and released into the wild. If poisonous animals/ reptiles such as snakes are found, a snake handler must be contacted to rescue the snake/ animal. A local snake handler must be identified before works start and his contact details shall be readily available.

7.7.14 Fire control

No fire is allowed. The Contractor shall be responsible for ensuring that immediate and appropriate actions are taken in the event of a fire and shall ensure that employees are aware of the procedures to be followed. The Contractor shall ensure that there is at least one fire extinguisher on Site. A fire extinguisher shall be present whenever undertaking any form of hot work, i.e., welding, gas cutting, angle grinding, etc. All transport, earth moving equipment, and materials handling equipment on the Site shall be fitted with fire extinguishers. All fire extinguishers shall be serviced at the specified intervals and all other fire-fighting equipment shall be maintained in a good state of repair.

7.7.15 Emergency procedures

The Contractor shall ensure that his employees are aware of the procedure to be followed for dealing with leaks and spills, which shall include notifying the Engineer/ ECO. The Contractor shall ensure that the necessary materials and equipment for dealing with leaks and spills are available on Site at all times. Treatment and remediation of spills shall be done to the satisfaction of the Engineer/ ECO.

In the event of a hydrocarbon spill, the source of the spillage shall be isolated, and the spillage contained. The affected areas shall be cordoned off and secured. The Contractor shall ensure that there is always sufficient supply of absorbent material on Site to absorb/ breakdown or encapsulate at least a 200ℓ liquid hydrocarbon spill. Any soil contaminated by such a spill must be removed and disposed of at an appropriately registered waste site.

Emergency equipment including spill kits and fire extinguishers shall be positioned at accessible locations near to areas or facilities where such emergencies may arise.

7.7.16 Erosion, water quality, and storm water control

The Contractor shall take all reasonable steps to prevent or remediate damage to the environment resulting from the Works in the form of erosion and sedimentation. The Contractor shall immediately remedy any situation that is or has the potential to result in soil erosion, water pollution and sedimentation from the works as a result of storm water flows. A preventative approach must be adopted whereby the extent of clearance and disturbance is limited to those areas required to complete the Works (i.e. a working corridor of 15 m). If required, the Contractor shall establish necessary storm water control mechanisms in agreement with the engineer, to effectively control the movement of water onto, through and off the construction site.

The Contractor shall establish, in agreement with the Engineer/ ECO, a suitable mechanism, where necessary, for containment and treatment of contaminated water emanating from the Works or associated activities, i.e., settlement or sedimentation ponds/ oil separators. Should dewatering of the pipe trench be required, then a method statement detailing how this will be done shall be compiled and submitted for the Engineer/ ECO's approval, before commencement. Consideration for erosion at discharge points is to be effectively dealt with. A plan must be submitted and approved by the ECO/ Engineer. The Plan for the control of large volumes of water associated with pipe pressure testing must be undertaken in a manner that does not pose a risk of soil erosion on slopes.

7.7.17 Topsoil Management

Topsoil stockpiles shall be convex and should not exceed 2 m in height. The mounds shall be formed such that no ponding of water occurs on the surface of the stockpile. Topsoil stockpiles along the pipeline trench will always occur on the upslope side of the trench, all subsoil will be stockpiled on the down-slope side of the trench.

Topsoil must not in any way be rendered unsuitable for further use and precautions shall be taken to prevent unnecessary handling and compaction. In particular, topsoil shall not be subject to a compaction force greater than 1 500 kg/m² and shall not be pushed by a bulldozer for more than 50 m. Trucks and other heavy equipment may not be driven over the stockpiles.

Unless otherwise specified, topsoil shall be taken from not deeper than 300 mm from the surface. If the Contractor fails to conserve topsoil as instructed, he shall obtain suitable substitute material

from other sources, without any additional payment.

In the event that only a Biological Soil Crust is found and no re-usable topsoil, the soil shall be stabilised by following the trimming and reshaping of the area by soaking it with water. This causes the mineral salts to rise to the surface and to solidify with the evaporation of the water, and so stabilising the soil surface against aeolian erosion and setting the scene for the reformation of a biological soil crust.

7.8 PROTECTION OF NATURAL FEATURES AND HERITAGE RESOURCES

7.8.1 *Protection of freshwater ecosystems*

The Contractor shall ensure that the impact on the riparian zone of any river systems is kept to a minimum. Heavy construction vehicles shall be kept out of the seasonal and ephemeral stream channels and the movement of construction vehicles shall be limited where possible to the existing roads. Contaminated runoff from the construction site shall be prevented from entering the river as far as possible. Where pipelines cross streams, they shall do so in a manner that does not impede or divert the flow in the channels. Riparian areas disturbed shall be rehabilitated, by the removal of alien vegetation where found and the re-vegetation of these disturbed zones with suitable indigenous vegetation. Also refer to chapter 7.9 below for the removal of alien vegetation associated with pipe leakages.

The following mitigation measures are proposed for the protection of riparian areas:

- o Heavy construction vehicles should be kept out of the seasonal and ephemeral stream channels and the movement of construction vehicles shall be limited where possible to the existing roads;
- o Where pipelines cross streams, they shall do so in a manner that does not impede or divert the flow in the channels;
- o Contaminated runoff from the construction site shall be prevented from entering the river as far as possible;
- o Avoid development in and destruction of the drainage lines throughout the area;
- o All materials on the construction site shall be properly stored;
- o Disposal of waste from the sites should be properly managed as per the waste management system (refer to chapter 7.7.6); and
- o Construction workers should be given ablution facilities at the construction sites that are located at least 50 m away from the river system, fastened to the ground and regularly serviced (refer to chapter 7.7.2).

7.8.2 *Protection of natural systems*

The Contractor shall ensure that the disturbance of vegetation and faunal communities and their habitats is kept to a minimum. The following mitigation and management measures are prescribed in this regard:

- o A track discipline limited to existing tracks with maximum speed limits (e.g., 30km/h) shall be implemented;
- o Off road driving shall not be allowed in areas prone to scarring (e.g., gypsum/ gravel plains). Nocturnal driving should also be avoided as this result in the killing of slow-moving fauna, e.g. various reptiles and other nocturnal species;
- o The use of lights during nocturnal activities shall be limited;
- o Overnight activities shall be prevented as far as possible;

- o The setting of snares (poaching), illegal collecting of veld foods (e.g. chameleons), indiscriminate killing of perceived dangerous species (e.g. snakes), and the collection of wood would not be allowed;
- o A suitable and appropriate refuse removal policy during the construction phase shall be implemented as littering could result in certain animals becoming accustomed to humans and associated activity and result in typical problem animal scenarios, e.g. Black-backed Jackal and Pied Crows;
- o The removal and damage of flora (especially endemic species and protected species e.g. (Forestry Ordinance No. 37 of 1952)), shall not be allowed;
- o No domestic animals shall be allowed on site;
- o A policy of capture and removal of fauna (e.g. slow moving species such as chameleon and snakes) encountered serendipitously within the construction areas shall be implemented. Such fauna should be removed to other areas of similar habitat in the area (also refer to chapter 7.7.13);
- o All sumps are to be inspected daily for any trapped animals. Sumps shall be covered every night;
- o Educate/ inform contractors on dangerous and protected species to avoid and the consequences of illegal collection of such species. Liaise with MEFT to provide this service as some of the area falls within the Dorob National Park;
- o A botanist/ ecologist shall identify protected and unique species; endemic species and protected species (Forestry Ordinance No. 37 of 1952) before the commencement of development activities in areas where these occur. These areas must be avoided;
- o Planting of potentially alien invasive plant species for ornamental purposes as part of the landscaping at the various developments – e.g., pump station shall not be allowed. Alien species often “escape” and become invasive causing further ecological damage; and
- o Implement a policy of “no tolerance” towards the existing invasive alien plant species in the area. This should include the removal and destruction of these species throughout the proposed development areas, especially associated with current leakages. Such activity would be beneficial to the overall ecology of the area (Cunningham, 2014).

7.8.3 Protection of archaeological sites

All earthworks equipment operators shall be informed to cease operating immediately if any artefact is unearthed and to report the finding immediately to the Engineer/ ECO and NamWater, who in turn shall notify the National Heritage Council. The Contractor shall take reasonable measures to protect any such find against further damage until its value can be properly assessed. In the event of such finds, the project management or contractors should adopt the “chance finds” procedure set out by the National Heritage Council. Work in the immediate vicinity of such a find shall also be discontinued until the Engineer/ ECO, and the National Heritage Council issues a clearance to recommence.

7.9 REHABILITATION

The Contractor shall, on completion of the Contract, ensure that all materials, temporary structures, temporary fences, plant, equipment and waste are completely removed from the Site. The area shall be inspected by the ECO for any form of damage, e.g. oil spills. If such areas are identified the Contractor shall be instructed to clean the area and rehabilitate to the satisfaction of the ECO.

Rehabilitation operations and re-vegetation of all disturbed areas shall commence as soon as possible and even run concurrently with construction activities where appropriate and practical.

For the purposes of this EMP, the landscaping and rehabilitation of disturbed areas shall entail the clearing, shaping, trimming, and scarification of the area, replacement of stockpiled topsoil where relevant, topped by randomly distributed stone and gravel surface.

7.9.1 Timing of landscaping and rehabilitation

The Contractor shall programme for the landscaping and rehabilitation of disturbed areas to occur as soon as practically possible following the cessation of the work in a specific area. In this regard, the Contractor's Works Programme shall clearly indicate how rehabilitation will be executed per phase, upon the completion of the works within a specific area. Once an area has undergone rehabilitation it shall be deemed a "no-go" area and protected accordingly against further or repetitive disturbance. The aforementioned needs to be accounted for in the work programme.

7.9.2 Shaping and trimming

All slopes which do not form part of the Permanent Works shall be graded so that no slope exceeds a maximum gradient of 1:3 or as otherwise directed by the Engineer. Contour drains may be provided to control erosion where required by the Engineer. Excavation and fills shall be formed in such a manner that the final profile shall appear as a natural extension to the adjacent, undisturbed ground profiles. Trimming shall consist of bringing the existing or previously shaped ground to a smoothly flowing surface with the final levels generally following the original surface and tying in with adjacent undisturbed areas as directed by the Engineer/ ECO.

7.9.3 Replacement of soil, stone and gravel

Replacement of soil, stone and gravel removed during site clearance shall be replaced in a random pattern or similar to that seen in adjacent, undisturbed areas, subject to the approval of the Engineer/ ECO. All excess overburden stones/ rocks shall be removed offsite. These rocks shall not be allowed to be stockpiled along the alignment. NamWater shall discuss the possibility of depositing these excess overburden rocks at one of the nearby quarries with the owners, if not possible the waste will be dumped at an appropriate waste dump site.

7.9.4 Alien vegetation

Alien vegetation on site, especially associated with leakages, shall be removed and destroyed. This must be done in consultation with an Ecologist to ensure that only alien vegetation are removed and destroyed in the correct manner.

7.10 COMPLIANCE AND PENALTIES

7.10.1 Compliance

Environmental management is concerned not only with the final results of the Contractor's operations to carry out the Works but also with the control of how those operations are carried out. Tolerance with respect to environmental matters applies not only to the finished product but also to the standard of the day-to-day operations required to complete the works.

It is thus required that the Contractor shall comply with the environmental requirements on an ongoing basis and any failure on his part to do so will entitle the Engineer/ ECO to certify the imposition of a penalty, as detailed below, if such non-compliance is not corrected within a period of one week of notification thereof.

7.10.2 Penalties

Penalties will be issued for certain transgressions. Penalties may be issued per incident at the discretion of the Engineer/ ECO. Such penalties will be issued in addition to any remedial cost incurred as a result of the non-compliance with this Specification. The Engineer/ ECO will inform the Contractor of the contravention and the amount of the penalty, and shall be entitled to deduct the amount from the monies due under the Contract.

Penalties for the activities detailed below, will be imposed by the Engineer/ ECO on the Contractor and/ or his Sub-Contractors.

a)	Any employees, vehicles, or things related to the Contractor's operations operating outside the designated boundaries or a "no-go" area.	N\$ 5,000
b)	Persistent and un-repaired oil leaks from machinery.	N\$ 2,000
c)	Persistent failure to monitor and empty drip trays timeously.	N\$ 2,000
d)	The use of inappropriate methods for refuelling, resulting in spillages.	N\$ 2,000
e)	Litter on site associated with construction activities.	N\$ 2,000
f)	Deliberate lighting of illegal fires on site.	N\$ 2,000
g)	Any employee eating meals on site, outside of the defined eating area.	N\$ 2,000
h)	Employees not making use of the site ablution facilities.	N\$ 2,000
j)	Failure to empty waste bins on a regular basis.	N\$ 200
k)	Unauthorised removal of vegetation.	N\$ 500
l)	Hunting, trapping and collection of animals (per unit taken).	N\$ 15,000
m)	Failure to implement specified noise controls.	N\$ 2,000
n)	A spillage, pollution, fire or any damage to the environment resulting from negligence on the part of the Contractor.	N\$ 5,000
o)	Damage to vegetation or ground arising from equipment leaving designated haul or access routes.	N\$ 5,000
p)	Failure to submit and, or proceeding with work without having or deviating from an approved method statement, for those task requiring a method statements in terms of the EMP.	N\$ 5,000

For each subsequent similar offence the penalty shall be doubled in value to a maximum value of N\$ 20,000. The Engineer/ ECO shall be the judge as to what constitutes a transgression in terms of this clause.

7.11 MEASUREMENT AND PAYMENT

7.11.1 Basic principles

Except as specified below or in the Project specifications or as Scheduled, no separate measurement and payment will be made to cover the cost of complying with the provisions of this EMP and such costs shall be deemed to be covered by the rates tendered for the items in the Schedule of Quantities completed by the Contractor when submitting his tender.

7.11.2 Scheduled items

All requirements of the environmental management specification

All work not measured elsewhere, associated with complying with any requirement of the environmental management Specification shall be as a measured sum. The tendered rate shall cover any cost associated with complying with the environmental management specification and

shall include for all materials, labour and plant required to execute and complete the work as specified, described in the Schedule of Quantities or shown on the drawing(s).

Method statements: Additional work

No separate measurement or payment will be made for the provision of Method Statements but, where the Engineer/ ECO requires a change on the basis of his opinion that the proposal may result in, or carries a greater than warranted risk of damage to the work required, provided it could not reasonably have been foreseen by an experienced Contractor.

Work “required by the project specification”

Where a clause in this Specification includes a requirement as “required by the Project Specification”, measurement and payment for compliance with that requirement shall be in accordance with the relevant measurement and payment clause of the Project Specification.

7.12 SUMMARY OF CONSTRUCTION PHASE MANAGEMENT ACTIONS

Table 2 contains a summary of management actions to be taken during the construction phase of the project.

Table 2: Construction Phase Management Table

Aspect	Management Objective	Mitigation Measures	Responsibility
Responsible management	To ensure that construction activities are carried out so as to cause the least possible disturbance to the existing amenities, whether natural or man-made.	<ul style="list-style-type: none"> The Contractor shall take adequate steps to educate all members of his workforce as well as his supervisory staff on the relevant environmental laws and protection requirements. A suitably qualified independent ECO shall be appointed by the Contractor. The Contractor shall construct and/or implement all the necessary environmental protection measures in each area before any construction work may proceed. 	Contractor
Environmental awareness	To ensure that all employees and Sub-Contractors are informed of their environmental obligations.	The Environmental, Health, and Safety Induction Course should be conducted by the ECO and Contractor's Health and Safety officer.	ECO
		The foreman responsible will provide feedback to his staff on their day-to-day environmental performance and address issues requiring attention and specific actions required.	Contractor
Safety to the public	To reduce the risks posed by the project to the public.	<ul style="list-style-type: none"> Where the public could be exposed to danger by any of the Works or site activities, the Contractor shall provide flagmen, barriers, and/or warning signs in English. No firearms shall be permitted on site without the prior approval of the Project Manager. <p>The Contractor shall implement appropriate measures to limit any adverse social impacts associated with the establishment of a construction camp and/or the accommodation of a construction workforce on the local communities.</p>	Contractor

Human resource and opportunities management	To ensure that job creation, inward migration of workers and accommodation of a workforce within a small community does not result in significant social impacts.	In order to enhance the benefits of employment creation for these communities, it is recommended that the Contractor shall establish a formal and organised recruitment process in line with this EMP.	Contractor
	Construction activities shall be restricted to specified hours in order to limit disturbance to the public.	The Contractor shall restrict construction activities to the hours of 6h30 - 17h00 during summer and 07h00 - 17h00 during winter on Mondays to Saturdays and no work will be permitted on Sundays or public holidays.	Contractor
Dust	To limit dust levels.	Appropriate dust control measures must be implemented.	Contractor
Noise	To limit noise levels.	Appropriate measures shall be implemented to limit noise levels.	Contractor
Method statements	To ensure effective and formal communication between the Project Management Team and the Contractor on construction issues throughout all stages of the project	System regarding method statement compilation, submission, review and approval to be rigorously implemented.	Contractor / ECO
		Method Statements that shall be provided by the Contractor 14 days prior to the mobilisation on site include: <ul style="list-style-type: none"> • Mobilisation plan; and • Operational and rehabilitation plan. 	Contractor / ECO
Environmental considerations pertaining to site layout	Suitable area identified where employees can eat and take work recess.	<ul style="list-style-type: none"> • The Contractor shall identify a suitable area, which is shaded and away from construction noise and dust, where employees can eat and take work recesses in relative comfort. • The eating areas shall be provided with scavenger proof rubbish bins, potable water and other sanitary conveniences. 	Contractor
Ablution facilities	Temporary toilets shall be provided by the contractor.	<ul style="list-style-type: none"> • Temporary / portable toilets shall be supplied by the Contractor for the workers at a maximum ratio of 1 toilet per 15 workers and be within walking distance of the work area. • The toilets shall be placed at appropriate locations to the approval of the Engineer / ECO. 	Contractor

		<ul style="list-style-type: none"> Toilets shall be kept in a good state of repair and shall be serviced at intervals sufficient to ensure that they are kept in clean and sanitary condition. 	
Site demarcation	The Contractor shall restrict all his activities, materials, equipment and personnel to the designated Site.	<ul style="list-style-type: none"> The Contractor shall ensure that the clearance of vegetation is restricted only to that required to facilitate the execution of the works. The Contractor shall peg the route for the proposed pipeline before commencing with any clearing operations. 	Contractor
Access, traffic and haul roads	Construction traffic shall be controlled to ensure minimal disruption to normal road users.	The Contractor shall be held responsible for the control of all project related traffic, including that of his suppliers, in ensuring that vehicles associated with the project remain on designated routes and within the designated working times.	Contractor
Solid waste management	To ensure that there is no illegal disposal of waste.	<ul style="list-style-type: none"> The Contractor shall provide sufficient number of rubbish bins with secured lids. No waste materials, including domestic, organic or construction wastes shall be burnt, dumped or buried on the Site. 	Contractor
Fuel and oil	To ensure that all liquid fuels are stored appropriately and adequate fire-fighting equipment is stored on site.	<ul style="list-style-type: none"> The Contractor shall ensure that all liquid fuels are stored in tanks or mobile bowsers with lids that are kept firmly shut. All tanks and/or mobile bowsers shall be situated in a bunded area. The Contractor shall ensure that there is adequate fire-fighting equipment at the fuel storage areas. 	Contractor
Equipment maintenance and storage	All vehicles and equipment are kept in good working order.	<ul style="list-style-type: none"> Leaking or damaged equipment shall be repaired immediately or removed from the Site. Drip trays shall be provided in construction areas for stationary and parked plant as well as for the emergency servicing of vehicles. 	Contractor
Stockpiling and stockpile areas	All plant and materials shall be stored in designed areas to minimise the disturbance to vegetation and topsoil.	Plant and materials shall be stored within the demarcated construction camp or batching areas.	Contractor

Materials handling, use and storage	All delivery drivers are informed of the on-site procedures and restrictions.	<ul style="list-style-type: none"> The Contractor shall ensure that any delivery drivers are informed of all procedures and restrictions, including “no-go” areas and designated haul routes. All material shall be stored within the designated Site boundaries. 	Contractor
Hazardous substances	Any hazardous substances are stored appropriately.	<ul style="list-style-type: none"> Hazardous chemical substances used during construction shall be stored in secondary containers. The relevant Material Safety Data Sheets (MSDS) shall be available on site. 	Contractor
Cement and concrete batching	Cement and concrete batching takes place in designated areas.	<ul style="list-style-type: none"> The batching of concrete shall take place on a smooth, impermeable surface (plastic) and shall be enclosed with a bund and sloped toward a sump to contain any spillages. The Contractor shall take all reasonable measures to prevent the spillage of cement / concrete during batching and construction operations. 	Contractor
Trenching	Trenches are appropriately demarcated and secured.	Trenches shall be demarcated appropriately and securely and regularly monitored to ensure that pedestrian (and vehicular) access to these areas is strictly prohibited.	Contractor
Fire control	To reduce the risk of fires	<ul style="list-style-type: none"> Fires are only permitted in designated area and shall not be left unattended. Fire extinguishers shall be readily available. 	Contractor
Emergency procedures	All employees are aware of emergency procedures.	<ul style="list-style-type: none"> The Contractor shall ensure that his employees are aware of the procedure to be followed for dealing with leaks and spills. The Contractor shall ensure that the necessary materials and equipment for dealing with leaks and spills are available on Site at all times. 	Contractor
Erosion, water quality, and stormwater management	To prevent or remediate damage to the environment resulting from the Works in the form of erosion and sedimentation shall be taken.	<ul style="list-style-type: none"> The Contractor shall take all reasonable steps to prevent or remediate damage to the environment resulting from the Works in the form of erosion and sedimentation. The Contractor shall immediately remedy any situation that is or has the potential to result in soil erosion, water pollution and sedimentation from the works as a result of storm water flows. 	Contractor

		<ul style="list-style-type: none"> Storm water should be managed appropriately at the culvert crossing where the pipeline are planned to go through underneath the road, so that blockage does not occur. 	
Protection of natural systems and archaeological sites.	All impacts to natural systems are kept to a minimum.	<ul style="list-style-type: none"> Disturbance of vegetation and faunal communities and their habitats is kept to a minimum. Heavy construction vehicles should be kept out of the seasonal and ephemeral stream channels and the movement of construction vehicles should be limited where possible to the existing roads. All earthworks equipment operators shall be informed to cease operating immediately if any artefact is unearthed and to report the finding immediately to the Engineer / ECO and NamWater, who in turn shall notify the National Heritage Council. 	Contractor
Rehabilitation	On completion of the Contract all materials, temporary structures, temporary fences, plant, equipment and waste are completely removed from the Site.	<ul style="list-style-type: none"> Rehabilitation operations and re-vegetation of all disturbed areas shall commence as soon as possible and even run concurrently where appropriate. 	Contractor
Penalties	To ensure that environmental requirements are strictly adhered to.	Penalties will be issues for certain specified transgressions.	Contractor

7.13 EMERGENCIES RESPONSE PROCEDURES

7.13.1 Response priorities

Depending on the nature of the emergency, the following response plan must be implemented as an integral part of the Omdel-Swakop Short-Term pipeline routine operations to lessen the severity of the emergency. All response actions should be geared toward the following priorities in the order below:

- Safety of People (always First)
- Protection of the Environment
- Protection of Assets

7.13.2 Emergency response procedures

NO.	Type of Emergency	Response actions	Responsible
1.	Substance spill i.e., concrete, oil, chemicals, etc.	<ul style="list-style-type: none"> • Stop and control the spill at the source first. • Contain the spill/leakage with appropriate containers i.e., drip trays, sumps, etc., and in an approved manner to the satisfaction of the RE. • Clean the affected area with water or an approved cleaning product. • The contaminated soil should be removed and disposed of at the Henties Bay or Swakopmund Waste Disposal Site. • Repair vehicle or machinery with leakage. • If it cannot be repaired, such vehicle or machinery should not be used until it is safe to do so. • Report the incident to the RE and record it in the logbook. • A spill kit must be available at the construction site (during construction phase) and at the Aroab Scheme (during the operation phase) and there must be at least one person with appropriate authority who is trained in hazmat response. • Refuelling vehicles should be equipped with specific vehicle spill kits. 	Contractor Safety Representatives Resident Engineer
2.	Fire outbreak	Follow the holistic Fire Approach as presented in Annexure D	Area Manager
3.	Accident i.e., injury to a person	<ul style="list-style-type: none"> • The priority after a construction accident should be to get medical attention for an injured person. • Assess the injured person's situation by checking breath, pulse. • Notify the First Aid Person • Assist the First Aid Personnel • Record in the incident report form. • Report incident to the Area Manager 	Contractor/Area Manager

8. OPERATION PHASE

8.1 Operation and Maintenance phase of the Swakop-Omdel Temporary Pipeline

The Operational Phase Section relates to the management and mitigation measures required to ensure that the continuation of the bulk water supply network and the maintenance of the infrastructure is operated in a manner that demonstrates responsible, precautionary environmental management.

The EMP will address specific areas of concern in terms of the long-term environmental management of the affected environment and is intended to serve as a guide to the on-going management of the water supply scheme site as well as the affected environment. The EMP will therefore aim to provide NamWater with the necessary tools to ensure that the potential impacts on the natural environment of the site during the operation of the water supply scheme are minimised. Moreover, it will aim to ensure that the infrastructure is operated and maintained according to Best Practice, in an environmentally sensitive and sustainable man.

8.1 SUMMARY OF OPERATION PHASE MANAGEMENT ACTIONS

Table 3 contains a summary of management actions to be taken during the temporal operation phase of the project.

Table 3: Operation and Maintenance Phase Management Table

Management Objectives	Potential Impact	Mitigation Measures	Responsibility
a. Minimize the loss of rare/ endangered fauna and flora species.	Loss of rare / endangered fauna or flora species.	<ul style="list-style-type: none"> o Avoid small mammal / reptile and bird nesting where possible. Do not hurt, kill or unnecessarily disturb birds or animals. 	<p>Ensure scheme operations and maintenance is limited to the area next to the pipeline and reservoir corridors.</p> <p>Visual checks to ensure that no disturbance occur outside the pipelines corridor.</p> <p>Frequency: Monthly.</p> <p>Responsible Person: Area Manager</p>
b. Prevent unnecessary removal of trees/plants of importance.	Unnecessary removal of trees/plants of importance.	<ul style="list-style-type: none"> o Do not remove any vegetation unless it is absolutely necessary. Make sure that operation and maintenance team is well informed. o Do not disturb, deface, destroy or remove plants or natural features, whether fenced or not. 	<p>Visual inspection/checks to prevent, as well as to ensure the unnecessary removal of trees/plants.</p> <p>Frequency: Monthly.</p> <p>Responsible Person: Area Manager.</p>
c. Minimize the loss of rare/ endangered fauna and flora species.	Loss of rare / endangered fauna or flora species.	<ul style="list-style-type: none"> o Avoid small mammal / reptile and bird nesting where possible. Do not hurt, kill or 	<p>Ensure scheme operations and maintenance is limited to the area next to the pipeline and reservoir corridors.</p>

<p>fauna and flora species.</p>		<p>unnecessarily disturb birds or animals.</p>	<p>Visual checks to ensure that no unnecessary disturbance occur outside the pipeline and reservoir corridors.</p> <p>Frequency: Monthly.</p> <p>Responsible Person: Area Manager</p>
<p>d. Prevent the poaching of flora and fauna.</p>	<p>Poaching of fauna and flora.</p>	<ul style="list-style-type: none"> o Employees who poach fauna and/or flora will be handed to the authorities for prosecution. o Regular checks of the surrounding environment must be undertaken to ensure no traps or snares have been set. Any snares or traps found on or adjacent to the site must be disposed of. 	<p>Visual inspection.</p> <p>Frequency: Weekly visual checks.</p> <p>Responsible Person: Area Manager</p>
<p>e. Minimise the creation and use of tracks outside existing roads.</p>	<p>Creation of tracks outside existing roads.</p>	<ul style="list-style-type: none"> o Use existing roads. o Traffic shall be controlled to ensure minimal disruption to other road users. o Do not construct new roads when the quality of existing roads deteriorates. Where possible, repair or upgrade existing roads. o Ensure that adequate vehicle turning areas are allowed for. 	<p>Visual checks to ensure that no off-road driving exists.</p> <p>Frequency: Weekly.</p> <p>Responsible Person: Area Manager.</p>

		<ul style="list-style-type: none"> o Enforce speed limits at all times. Unless otherwise specified, the speed limit on access roads is 50km/h. o Runoff from roads must be managed to avoid erosion and pollution problems. o Roads not required for further use shall be rehabilitated immediately. o Use 3-point turns and not U-turns. Confine turning to the road. o Prevent shortcuts between roads. 	
<p>f. Minimise the damage and destruction of important palaeontological and archaeological sites.</p>	<p>Disturbance to sites of palaeontological and archaeological importance.</p>	<ul style="list-style-type: none"> o Do not disrupt any archaeological or palaeontological sites. Inform NEM (J Kamburona at cell no 081 1441528) who will take the necessary action. o All workers will be educated about the importance of preserving archaeological sites. o Educate specific workers about tell-tale signs of 	<p>Monitoring can and should involve field induction of key scheme personnel so that they will be able to recognize the important palaeontological and archaeological sites themselves.</p> <p>Frequency: Monthly.</p> <p>Person Responsible: CONTRACTOR.</p>

		archaeological sites and the action to be taken if one is identified	
g. Minimise the number of heavy vehicles on the road.	Increased number of heavy vehicles on the road.	<ul style="list-style-type: none"> o Heavy vehicles should be limited to numbers necessary. 	<p>Checks to ensure that there is minimal heavy vehicle on the road.</p> <p>Frequency: Weekly.</p> <p>Responsible Person: Area Manager.</p>
h. Minimise and if possible prevent the activities that accelerate erosion during operation or maintenance.	Erosion.	<ul style="list-style-type: none"> o Runoff on steep inclines should be diverted to prevent the formation of erosion gullies. o Vegetative cover is the most efficient and economical means of controlling soil erosion. o Berms should be constructed at selected intervals on long sloping areas to prevent erosion. Diversion berms should be reshaped as necessary to divert runoff. o Berms should be constructed with compacted soil, have a minimum top width of 60 cm and a minimum height of 30 cm, and should allow for 10% settlement. It should have 	<p>Visual inspection to ensure that activities that accelerate soil erosion are minimised and if possible prevented at all cost.</p> <p>Frequency: Weekly.</p> <p>Responsible Person: Area Manager.</p>

		<p>side slopes with a gradient of at least 2:1.</p> <ul style="list-style-type: none"> o Runoff should be guided to a point where it will not cause damage. Scour by the discharge of runoff should be prevented. 	
i. Minimise and if possible prevent the collection and removal of firewood during operation and maintenance.	Collection of firewood.	<ul style="list-style-type: none"> o No vegetative matter may be removed for firewood. o The collection and removal of firewood is not allowed. 	<p>Checks to ensure that there's no removal and collection of firewood by the employees.</p> <p>Frequency: Weekly.</p> <p>Responsible Person: Area Manager.</p>
j. Noise	Generation of noise	<ul style="list-style-type: none"> o Install and maintain silencers on trucks and machinery. o Repair faulty brakes. o Operators should not use hooters for the purposes of general communication. 	<p>Visual inspection to ensure that activities that generate noise are minimised and if possible prevented.</p> <p>Frequency: Daily.</p> <p>Responsible Person: Area Manager.</p>
k. Driving	Increased risk for accidents	<ul style="list-style-type: none"> o No operator will operate any equipment when he is under the influence of alcohol. o Adhere to safety rules. o Always keep your headlights on. 	<p>Visual inspection to ensure that activities that generate noise are minimised and if possible prevented.</p> <p>Frequency: Weekly.</p> <p>Responsible Person: Area Manager.</p>

		<ul style="list-style-type: none"> o Drivers must have the correct licence for the vehicle they are driving. 	
I. To avoid potential chemical /hazardous substance pollution	Pollution	<ul style="list-style-type: none"> o Designated areas for the storage of potentially hazardous material will be lined with concrete and secured. The bunded area will be of adequate capacity to contain 1.5 times the volume of the hazardous material to be stored in the bunded area. 	<p>Visual checks to ensure chemical/hazardous substances are stored appropriately.</p> <p>Frequency: Monthly.</p> <p>Responsible Person: Area Manager.</p>
m. To ensure correct procedures are in place to avoid environmental impacts associated with maintenance activities as well as proactive intervention to avoid, and if required, to respond to emergencies	Environmental Degradation	<ul style="list-style-type: none"> o Establish regular reporting procedures on maintenance o Undertake regular inspection and maintenance of all infrastructure to ensure in working order and to assess damaged / deficient equipment, as per the Operations and Maintenance Manual. o Review, and if necessary, revise maintenance manual. o Establish emergency procedures guidelines for the blockage/failure, flooding, contaminant removal and 	<p>A review of the Operations and Maintenance Manual.</p> <p>Frequency: Bi-annual</p> <p>Responsible Person: NamWater Maintenance Team</p>

		<p>disinfection, power failure and fire of the scheme.</p> <ul style="list-style-type: none"> o Implement the response procedures when emergency incident occurs. o Complete the incident report checklist in the case of emergency and keep with monitoring records for submission. o Undertake annual education course for all operational staff. o Review, and if necessary revise emergency manual. 	
n. To prevent the improper disposal of waste	Pollution	<ul style="list-style-type: none"> o Enforce a waste management programme. o All waste will be removed to an appropriate waste dump. o No waste should be buried. o General Waste: Includes waste paper, plastic, cardboard, harmless organic (e.g. vegetables) and domestic waste. o Hazardous Substances include: sewerage, fuels, lubrication oils, hydraulic and 	

		<p>brake fluid, solvents, paints, anticorrosives, insecticides and pesticides, chemicals, acids etc. It should be disposed of at designated hazardous disposal sites.</p> <ul style="list-style-type: none">o Contaminated soil should be stored in drums and taken to the nearest appropriate waste dumpsite.o Do not change oil on uncovered ground. Drip trays will be used to catch oil when vehicles are repaired in the field.o Used oil and hydraulic fluids will not be discarded on the soil or buried. It will be removed from site and taken back to an appropriate dump.o In the event of an hazardous spill:<ul style="list-style-type: none">- Immediately implement actions to stop or reduce the spill.- Contain the spill.	
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		<ul style="list-style-type: none"> - Arrange implementation of the necessary clean-up procedures. - Collect contaminated soil, water and other materials and dispose it at an appropriate waste dumpsite. o Used solvents and grease should be stored in drums or other suitable containers. It should be sealed and recycled or disposed at an appropriate disposal site. o Hazardous waste should not be burnt. o Bunding, concrete slabs and/or other protective measures should be installed where hazardous materials are handled. o Ensure that the staff are informed and have information pertaining to the management of spills or ingestion. 	
<p>o. Prevent diesel and oil spills during operation and</p>	<p>Concrete, diesel and oil spills and inadequate clean up.</p>	<ul style="list-style-type: none"> o Clean up concrete, fuel and oil spills immediately. 	

<p>maintenance and ensure adequate clean up.</p>		<ul style="list-style-type: none"> o Clean small oil or fuel spills with an approved/appropriate absorbent material. o Contain oil or fuel spills in water using an approved oil absorbent fibre. o In cases where oil spills cannot be cleaned up immediately, monitor seepage into deeper soils and groundwater. o Do not bury polluted soil, but rather dispose it at an appropriate dump site. o Provide bunding at fuel storage and transfer sites. The bunding should be big enough to contain 110% of the volume of the tank. Where a bund wall encloses a group of tanks, the bund wall must be able to contain 110% of the volume of the largest tank in the group. Tanks must stand on a concrete slab, or otherwise have a sealed, base in order to prevent the leakage of contaminants into the soil. 	
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<p>p. Waste Management</p>	<p>Littering (Litter such as paper, plastic etc. can be blown away into the surrounding environment).</p>	<ul style="list-style-type: none"> o No littering will be allowed. The operation and maintenance areas will be kept free of waste at all times. All maintenance sites will be cleaned on a daily basis before leaving the site. o Provide sufficient waste bins at worksites. Make sure that all waste is removed from the worksites. o Bins should be placed in pairs to ensure that one is always present while the other is being emptied. o Areas likely to generate higher quantities of waste shall be equipped with additional bins. o Refuse bins must be stable, i.e. cannot be tipped by animals, and have scavenger and baboon proof lids. o Make sure that the bins are covered so that plastic bags, paper etc. are not blown away. o Make sure that the bins are regularly emptied and the 	
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		<p>waste taken to an appropriate waste dumpsite.</p> <ul style="list-style-type: none"> o The central waste storage vessel shall be emptied weekly or as necessary. 	
<p>q. Appropriate storage of machinery, vehicles and materials.</p>	<p>Inappropriate storage of machinery, vehicles and materials may result in the possible damage/disturbance of nearby undisturbed environments.</p>	<ul style="list-style-type: none"> o Store machinery, vehicles and materials only in demarcated areas; o Do not leave machinery and equipment standing around if not in use; 	<p>Regular inspection to ensure that machinery, vehicles and equipment are stored in designated areas.</p> <p>Frequency: Daily.</p> <p>Responsible Person: Area Manager.</p>

		<ul style="list-style-type: none"> o Do not store machinery, vehicles or materials in undisturbed or rehabilitating areas 	
<p>r. Minimize the leakage of fuels and lubricants from vehicles and equipment.</p>	<p>The use of vehicles and equipment that may leak fuel and lubricants.</p>	<ul style="list-style-type: none"> o Only service machinery and vehicles in designated areas. o Regularly check your vehicle for fuel and oil leaks. o Maintain vehicles and equipment in good conditions through regular and thorough servicing. o Inform the Foreman of leaking vehicles and machinery so that he can schedule repairs. o Only refuel on the bund created for that purpose. o Immediately clean any accidental fuel and oil spills – do not hose spills into the natural environment. o Dispose of contaminated soil as hazardous waste in the correct location on site. 	<p>Visual inspection to ensure that vehicles and equipment are in excellent condition and also to ensure that there is no leakage of fuels and lubricants.</p> <p>Frequency: Daily.</p> <p>Responsible Person: Area Manager.</p>

		<ul style="list-style-type: none">o If a mobile fuel bowser is used, then all refuelling shall occur with appropriate measures in place to prevent spillages (drip trays, funnels, non-dripping dispensing nozzles etc.)o All mobile fuel browsers shall carry a spill kit that is adequately sized to contain at least a 200 litre spill.o Train staff in the correct procedure/technique to transfer fuels.o Make sure all vehicles are roadworthy. Repair faulty brakes, exhausts etc. immediately.o Fire extinguishers shall be present whenever undertaking any form of hot work, i.e. welding, gas cutting, angle grinding, etc.	
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<p>s. Minimise the risk of HIV infection and the increase of STI's.</p>	<p>Risk of HIV infection.</p>	<ul style="list-style-type: none"> o Provide an AIDS awareness programme to all the staff. 	<p>Verify that an awareness and education programme on the risks of HIV/AIDS and recommended preventative measures has been conducted.</p> <p>Frequency: Monthly</p> <p>Responsible Person: Area Manager.</p>
<p>t. Minimise the occurrence of injuries.</p>	<p>Injuries.</p>	<ul style="list-style-type: none"> o Make sure that all staff are equipped and know how to use safety and protective gear. This includes hard hats, goggles, hearing protectors, dusk masks, steel-toed shoes etc. o Keep a comprehensive first aid kit at the scheme offices and at maintenance sites. o Establish an emergency rescue system for evacuation of serious injured people. o Emergency procedures for accidents should be communicated to all employees. o Dangerous areas must be clearly marked and access to these areas controlled or restricted. 	<p>Checks to ensure that correct procedures are followed and that protective clothing are worn at all times during scheme operations and maintenance.</p> <p>Frequency: Check weekly.</p> <p>Responsible Person: Area Manager.</p>

		<ul style="list-style-type: none">o Good driving and adherence to safety rules will result in a minimum number of road and workplace accidents.o Fire extinguishers must be available at all refuelling sites. Staff should be trained to handle such equipment.o Nobody is allowed to dispose a burning or smouldering object in an area where it may cause the ignition of a fire.o Hazardous substances must be kept in adequately protected areas to avoid soil, air or water pollution.o Work areas, such as these for the maintenance of equipment, must be on concrete slabs.o Explosives should be stored according to the prescribed regulations.	
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9. SITE CLOSURE AND REHABILITATION

Rehabilitation is the process of returning the land in a given area that has been disturbed by operation and maintenance to its original state, or an otherwise determined state. Many projects, if not all, will result in the land becoming degraded to some extent. However, with proper rehabilitation most impacts associated with the operation and maintenance of the scheme and pipelines, could be mitigated and restored to an acceptable level. Poorly rehabilitated areas provide a difficult legacy issue for governments, communities and companies, and ultimately tarnish the reputation of companies as a whole.

Objectives of proper site closure and rehabilitation include the following:

- Reduction or elimination of the need for a long-term management program to control and minimise the long-term environmental impacts;
- Clean-up, treatment or restoration of contaminated areas (e.g. soils contaminated by oil or fuel spills, concrete spills, etc.). Excavation of contaminated material and disposal thereof in an acceptable manner.

Rehabilitation measures to implement:

- a. A site inspection will be held quarterly by the CONTRACTOR after every maintenance work during operation of the scheme. Rehabilitation will be done to the satisfaction of the ENV section and MEFT.
- b. Frequent inspections of the scheme and effective follow-up procedures, to prevent minor defects from becoming major repair jobs.
- c. Make sure all soil polluted during maintenance work is properly stored in drums and removed to an appropriate waste dump.
- d. Make sure all windblown litter is removed once maintenance has seized.
- e. Make sure that all potential hazards (i.e. the sewerage pit) are properly closed and left in a safe and neat position.

Rehabilitation will be completed when the above have be achieved.

10. GENERAL PROPOSED MITIGATION MEASURES: DECOMMISSIONING PHASE

The pipeline will be decommissioned once the Omdel-Wlotzkasbaken pipeline becomes operational. The decommissioned pipes will be recovered and stored at the NamWater Swakopmund offices, for re-use in future projects.

Environmental issue/impacts	Source of impact	Mitigation measures	Responsibility
Loss of plants or plant parts due to illegal collection	<ul style="list-style-type: none"> Collection of plants, parts of plants or seeds for the horticultural trade is illegal and compromises populations and recruitment, particularly of endemic and restricted range species. Illegal collection of wood, or other plant material in a national park, for burning reduces the resources available for fauna and reduces debris that eventually degrades and becomes soil nutrients. 	<ul style="list-style-type: none"> No collection whatsoever of any plants or plant parts should be permitted, including fuel for fires. All Contractors and sub-contractors must be fined (as per the MEFT fine list). Responsibility for damage must lie with the main contractor, regardless of whether it was done by a sub-contractor, in order to prevent “passing of the buck”. 	Project Manager Contractor/s
Loss of vertebrate fauna habitat	<ul style="list-style-type: none"> Loss of vertebrate fauna habitat during removal of pipelines. 	<p>Sensitive habitats – i.e.</p> <ol style="list-style-type: none"> ephemeral drainage lines black dolerite ridges/outcrops potentially serving as habitat to endemic reptiles, and lichen fields – e.g. areas serve as potential nesting site for Damara terns – should be avoided and/or mitigations followed regarding above- or below ground pipeline infrastructures: <ul style="list-style-type: none"> Remove all aboveground pipeline infrastructures; and Rehabilitate disturbed area (i.e. close trenches, smooth disturbed soil 	Project Manager Contractor/s

11. NAMWATER ENVIRONMENTAL CODE OF CONDUCT

What is an Environmental Code of Conduct?

It is a set of rules that everybody has to follow in order to minimise damage to the environment.

What is the ENVIRONMENT?

The ENVIRONMENT means the surroundings within which people live. The ENVIRONMENT is made up of the **soil, water, plants, and animals** and those characteristics of the soil, water, air, and plant and animal life that influence **human health and well-being**. **People and all human activities** are also part of the environment and have to be considered during the operation of the Scheme.

Do these ENVIRONMENTAL RULES apply to me?

YES, The Environmental Rules apply to EVERYBODY. This includes all permanent, contract, or temporary workers as well as any other person who visits the Scheme. Every person will be required to adhere to the Environmental Code of Conduct.

ALL PERSONNEL must study and keep to the Environmental Code of Conduct

The CONTRACTOR will issue warnings and will discipline ANY PERSON who breaks any of the Environmental Rules. Repeated and continued breaking of the Rules will result in a disciplinary enquiry and which may result in that person being asked to leave the Scheme permanently.

What if I do not understand the ENVIRONMENTAL RULES?

ASK FOR ADVICE, if any member of the WORKFORCE does not understand, or does not know how to keep any of the Environmental Rules, that person must seek advice from the CONTRACTOR. The PERSON that does not understand must keep asking until he/she is able to keep to all the Environmental Rules.

Safety and Security

1. Only enter and exit roadways and maintenance areas at demarcated entrances.
2. Wear protective clothing and equipment as per signboards at the Scheme and according to instructions from your CONTRACTOR.
3. Report to your CONTRACTOR if you see a stranger or unauthorised person in the maintenance area.
4. Never enter any area that is out of bounds or that is demarcated as dangerous without permission of your CONTRACTOR.
5. Never climb over any fence or enter private property without permission of the landowner or your CONTRACTOR.
6. Do not remove any vehicle, machinery, equipment, or any other object from the maintenance site without the permission of your CONTRACTOR.
7. Keep clear of blasting sites. Follow the instructions of your CONTRACTOR.
8. Never enter or work in the Scheme while under the influence of alcohol or other intoxicating substances.
9. All staff should know the emergency procedures in case of accidents.

Waste Disposal

10. Learn the difference between different types of waste, namely:

- general waste, and
- hazardous waste.

Containers will be provided for different types of wastes.

General Waste includes waste paper, plastic, cardboard, harmless organic (e.g. Vegetables) and domestic waste

Hazardous Waste includes objects, liquids or gases that are potentially dangerous or harmful to any person or the environment. Sewage, fuel, tyres, diesel, oils, hydraulic and brake fluid, paints, solvents, acids, soaps and detergents, resins, old batteries, etc. are all potentially hazardous.

11. Learn how to identify the containers for the different types of wastes. Only throw general waste into containers, bins or drums provided for general waste.
12. Recycle drums, pallets and other containers.
13. Never bury or burn any waste on site, all waste is to be disposed in allocated refuse disposal containers, bins or bags.
14. Never overfill any waste container. Inform your CONTRACTOR if you notice a container that is nearly full.
15. Do not litter.
16. Do not bury litter or rubbish in the backfill trench.

Plants and Animals

17. **Do not ever pick any plants, or catch any animal.** People caught with plants or animals in their possession will be handed to the authorities for prosecution.
18. Never feed, tease, play with, or set devices to trap any animal or livestock. Wild animals are not to be domesticated.
19. Keep off the rock outcrops unless given specific permission by the CONTRACTOR to be there.
20. Never cut down any tree or branches for firewood.
21. Never leave rubbish or food scraps or bones where it will attract animals, birds, or insects.
22. Rubbish must be thrown into allocated waste disposal bins/bags.
23. Always close the gates behind you.

Preventing Pollution

24. Only work with hazardous materials in bunded areas.
25. Never discard any hazardous substances such as fuel, oil, paint, solvent, etc. into stream channels or onto the ground. Never allow any hazardous substances to soak into the soil.
26. Clean up spills immediately.
27. Immediately report to your CONTRACTOR when you spill, or notice any hazardous substance overflow, leak or drip or spill on site, into the streambeds or along the road.
28. Immediately report to your CONTRACTOR when you notice any container, which holds hazardous substances overflow, leak or drip. Spillage must be prevented.
29. Only wash vehicles, equipment and machinery, containers and other surfaces at work site areas designated by your CONTRACTOR.
30. Do not change oil on uncovered surfaces.

31. If you are not sure how to transport, store, use, or get rid of any hazardous substances ask your CONTRACTOR for advice.

Health

32. Drink lots of clean water every day.
33. Use toilets that have been provided.
34. Take the necessary precautions to avoid contracting HIV / AIDS. Condoms are available at most Clinics.
35. Inform your CONTRACTOR when you are sick.
36. Do not work with any machinery when you are sick.
37. If you are working in malaria areas, you must take the necessary precautions.

Dust Control

38. Do not make any new roads or clear any vegetation unless instructed to do so by your CONTRACTOR.
39. Keep to established tracks and pathways.
40. Keep within demarcated work areas.

Saving Water

41. Always use as little water as possible. Reduce, re-use and recycle water.
42. Never leave taps or hose pipes running. Close all taps after use.
43. Report any dripping or leaking taps and pipes to your CONTRACTOR.

Working Hours

44. You may only work on weekends and after hours with the consent of the CONTRACTOR.

Archaeological and Cultural Objects

45. If you find any archaeological, cultural, historical or pre-historical object on the maintenance site you must immediately notify your CONTRACTOR.
46. Never remove, destroy, or disturb any cultural, historical, or pre- historical object on site.

Cultural and Historical Objects include old buildings, graves or burial sites, milestones, old coins, beads, pottery and military objects.

Pre-Historical objects include fossils and old bones, old human skeletal remains, pieces of pottery and old tools and implements.

Sensible Driving

47. Tracks and roads should be kept to a minimum. Where possible follow existing roads.
48. No off-road driving is allowed.
49. Never drive any vehicle without a valid licence for that vehicle class and do not drive any vehicle that is not road-worthy.
50. Never drive any vehicle when under the influence of alcohol.
51. **Always** keep your headlights on when driving on dusty roads.
52. Keep to the roads as specified by your CONTRACTOR. Vehicles may only be driven on demarcated roads. Drivers should always use three point turns, "u-turns" are not allowed. Do not cut corners.

53. Do not drive on rocky outcrops.

Noise

54. Keep noise levels as low as possible.
55. Do not operate noisy equipment outside normal working hours.

Fire Control

56. Do not make open fires, use a drum or tin and do not collect any vegetation to burn.
57. Do not smoke or make fires near refuelling depots or any other area where fuel, oil, solvents, or paints are used or stored. Fireplaces should be at a safe distance from fuel and explosive storage sites as well as vehicle parking sites.
58. Cigarette butts should always be thrown in allocated refuse bins. Make sure that the cigarette butt is out before throwing it into the bin.
59. Immediately notify your CONTRACTOR if you see an unsupervised fire at the campsite or maintenance site.

Dealing with Environmental Complaints

60. If you have any complaint about dangerous working conditions or potential pollution to the environment, talk to your CONTRACTOR.
61. If any person complains to you about noise, lights, littering, pollution, or any harmful or dangerous condition, immediately report this to your CONTRACTOR.

Jolanda Kamburona

Tell: 061-71 2105

Cell: 081 144 1528

or

Fillemon Aupokolo

Tell: 061-71 2095

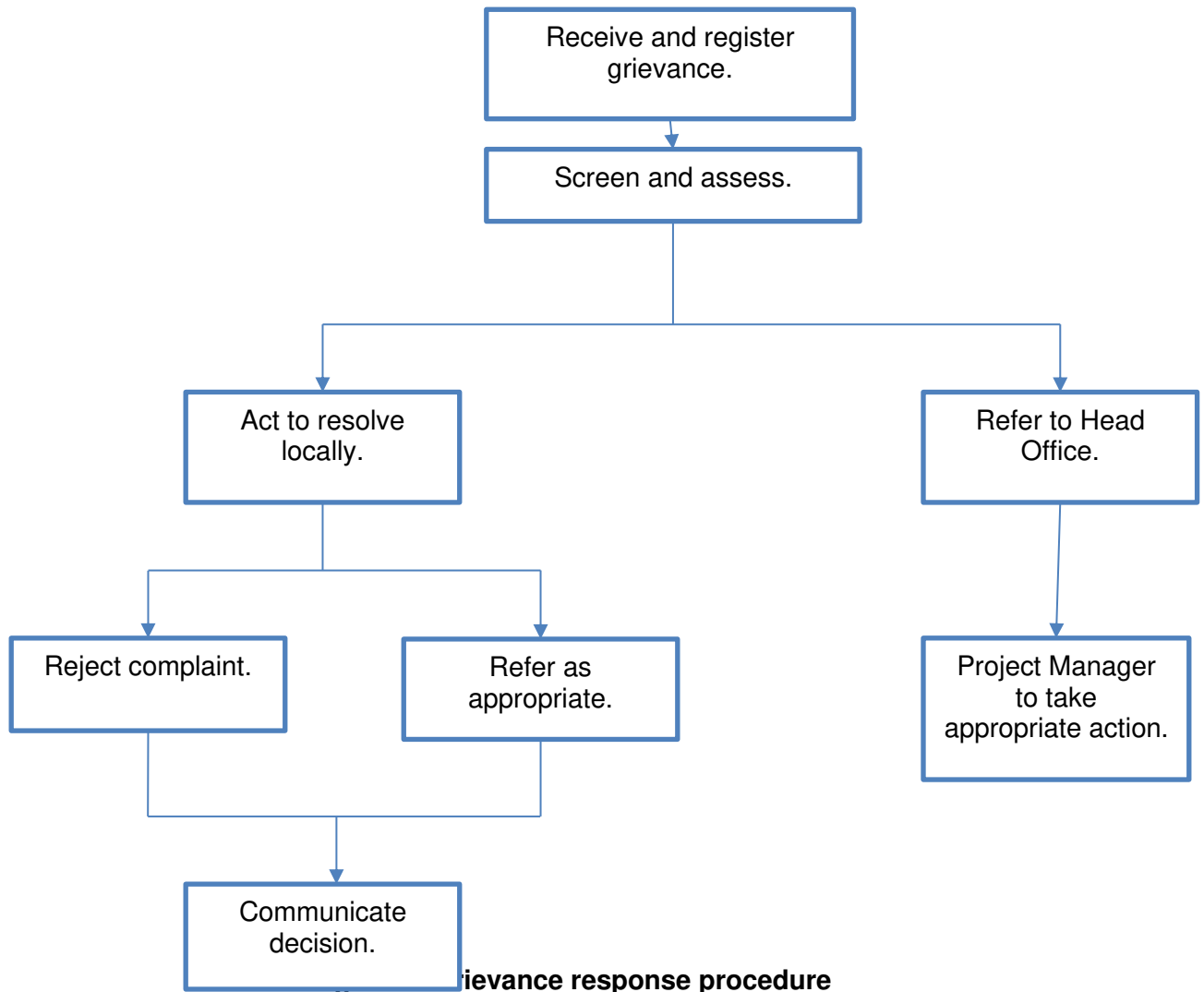
Cell: 081 325 3301

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APPENDIX A: GRIEVANCE PROCEDURE

All grievances should be submitted through the completion of the grievance registration form as presented below and submitted to the CONTRACTOR during the construction phase and to the Scheme Superintended during the operation and maintenance phase.



Upon receipt of the registered grievance forms, the Contractor shall screen and assess to either act to solve the grievance locally or refer it to head office. If the grievance is referred to the head office, the line manager should decide. If the grievance is to be solved locally, it should either be rejected or handled appropriately of which the decision should be communicated to the aggrieved person.

GRIEVANCE REGISTRATION

Grievance Registration	
Case No:	Date:
Name of complainant:	Cell no:
	Email address:
Details of grievance: (Date, location, persons involved, frequency of occurrence, effects of ensuing situation, etc)	
Name of person recording grievance:	Cell number:
Proposed date of response:	
Signature of recording person:	Signature of complainant:
Date of redress:	

APPENDIX B: EXAMPLE OF A METHOD STATEMENT

CONTRACT: DATE:

PROPOSED ACTIVITY (give title of Method Statement and reference number):

WHAT WORK IS TO BE UNDERTAKEN (give a brief description of the works):

WHERE ARE THE WORKS TO BE UNDERTAKEN (where possible, provide an annotated plan and a full description of the extent of the works):

START AND END DATE OF THE WORKS FOR WHICH THE METHOD STATEMENT IS REQUIRED:

Start Date:

End Date:

HOW ARE THE WORKS TO BE UNDERTAKEN (provide as much detail as possible, including annotated maps and plans where possible): Note: please attach extra pages if more space is required

DECLARATIONS

1) ENVIRONMENTAL CONTROL OFFICER

The work described in this Method Statement, if carried out according to the methodology described, is satisfactorily mitigated to prevent avoidable environmental harm:

(Signed)

(Print name)

Date: _____

2) PERSON UNDERTAKING THE WORKS

I understand the contents of this Method Statement and the scope of the works required of me. I further understand that this Method Statement may be amended on application to other signatories and that the ECO will audit my compliance with the contents of this Method Statement:

(Signed)

(Print name)

Date: _____

3) ENGINEER

The works described in this Method Statement are approved:

(Signed)

(Print name)

Date: _____

4) APPROVING AUTHORITY

The works described in this Method Statement are approved:

(Signed)

(Print name)

Date: _____