



**ENVIRONMENTAL MANAGEMENT PLAN (EMP)
FOR THE ESTABLISHMENT AND OPERATION OF
A BRICKS MANUFACTURING FACILITY ON
PORTION 554 AT BRAKWATER, WINDHOEK,
KHOMAS REGION**

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DOCUMENT INFORMATION	
DOCUMENT STATUS	FINAL
PROJECT TITLE	ENVIRONMENTAL MANAGEMENT PLAN FOR THE ESTABLISHMENT AND OPERATION OF A BRICKS MANUFACTURING FACILITY ON PORTION 554 AT BRAKWATER, WINDHOEK, KHOMAS REGION, NAMIBIA.
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DATE	SEPTEMBER 2023

ABBREVIATION

DEAF	Department of Environmental Affairs and Forestry
EA	Environmental Assessment
EAP	Environmental Assessment Practitioner
ECC	Environmental Clearance Certificate
ECO	Environmental Compliance Officer
ECS	EnvironClim Consulting Services
EIA	Environmental Impact Assessment
EMA	Environmental Management Act (No. 7 of 2007)
EMP	Environmental Management Plan
MEFT	Ministry of Environment, Forestry and Tourism

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1. INTRODUCTION

Midma Investment cc, hereafter referred to as the proponent intends to establish and operate a bricks manufacturing facility that uses optimised hydraulic machines designed to manufacture super bricks, pavers, interlocks and other concrete materials. The company has a vast experience in bricks production and it supplies numerous construction projects in Windhoek including some of the national projects funded by the government. Due to the demand of bricks which has been prompted by the increase in civil infrastructural development in Windhoek, the company intends to increase its bricks production in order to meet customer demands and avoid delays of construction projects including national project. The proposed activity is a listed activity as per Environmental Management Act 2007 (Act No. 7 of 2007) (EMA) and an Environmental Clearance Certificate (ECC) is therefore required to commission the proposed project. EnvironClim Consulting Services (ECS) was therefore appointed by Midma Investment CC to conduct an Environmental Impact Assessment (EIA) and formulate an Environmental Management Plan for the proposed development.

2. PROJECT LOCATION

The proposed site is situated on Portion 554 at Brakwater, approximately 20 Km north Windhoek, Khomas Region (see **Figure 1** below). The proposed site covers an area of approximately 10 000 m² and is accessible via an existing road that branch out of the B1 main road that stretches from Windhoek to Okahandja and turn off immediately to the left after Jan Japan Motors into the western direction the proposed site will be situated on the right approximately 800 meters from the tar road.

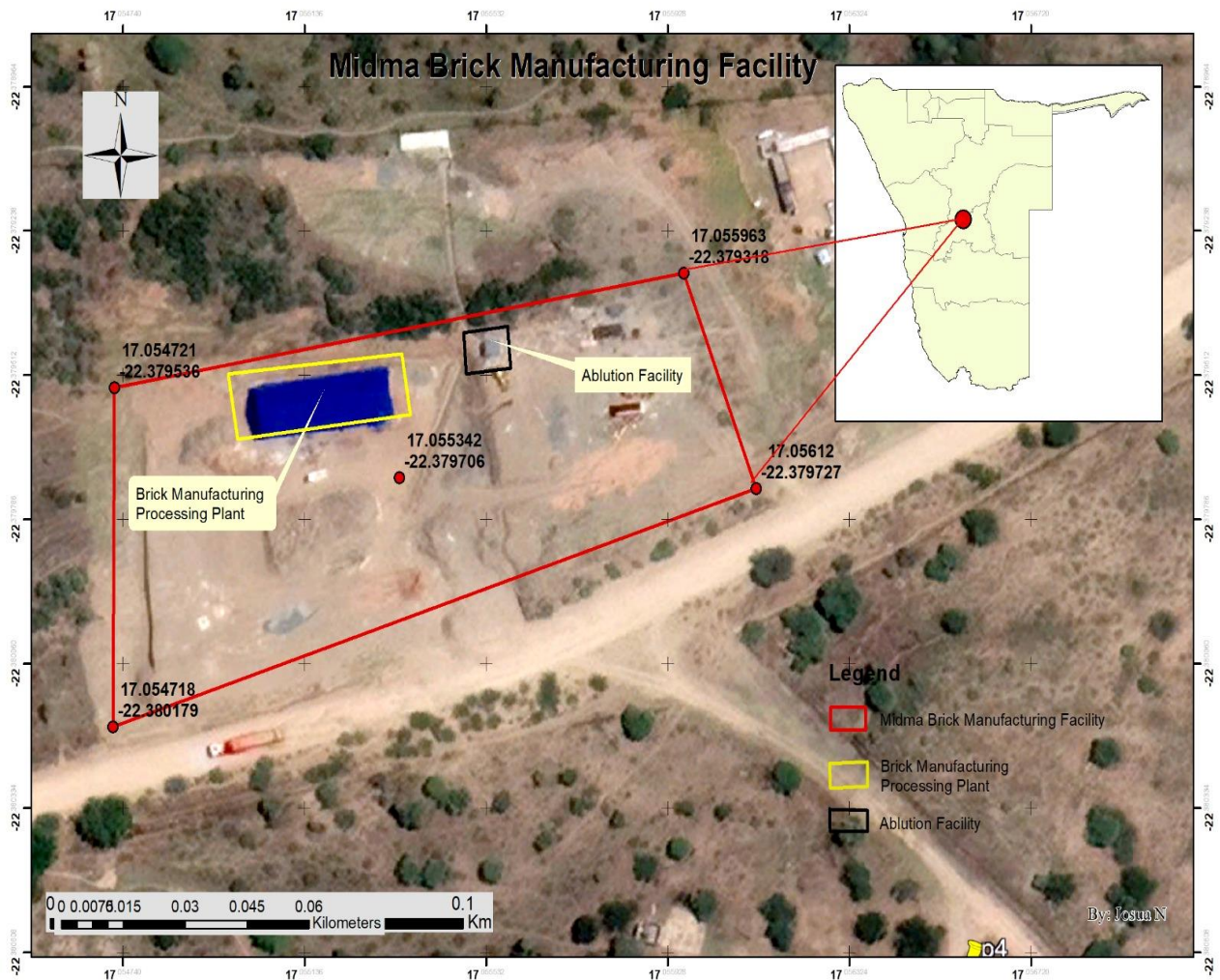


Figure 2: Location of the proposed bricks manufacturing facility on Portion 554 at Brakwater, Khomas Region (geo-reference point - 17.055342 S, 22.379706 E).

3. PURPOSE OF THE EMP

This Environmental Management Plan (EMP) is strategy framework that detailed the procedure that involves monitoring programs, mitigation measures and management to reduce possible environmental impacts to insignificant levels. Moreover, the EMP define the roles and responsibility for individuals involves in construction and operation of the bricks manufacturing facility on Portion 554 at Brakwater. This EMP include formulating mitigation measures for the planned bricks manufacturing facility on Portion 554 at Brakwater.

4. COMPLIANCE TO THE EMP

This EMP is a legally binding document as given under the provisions of the Environmental Management Act, 2007 (Act No. 7 of 2007). The project proponent and its contractors must

therefore adhere to the framework of this document. It should be noted further that the EMP is a living document and is subjected to amendments depending on the changing environments and new information that may be available in the future, hence it must be revised accordingly with the provision of the EMA.

5. LEGAL AND POLICY FRAMEWORK

The proposed project shall be established and operated under the provision of the relevant statutory framework of Namibian and international laws of which Namibia is signatory.

Table 3. Legal Requirements for the proposed project

Legislation	Summary	Applicability
The Namibian Constitution	The Namibian constitution is the supreme law of the country which is committed to sustainable development. Article 95(1) of the Constitution of Namibia states that: - “The State shall actively promote and maintain the welfare of the people by adopting policies aimed at ... The maintenance of ecosystems, essential ecological processes and biological diversity of Namibia and utilization of living natural resources on a sustainable basis for the benefit of all Namibians, both present and future”.	To undertake the EIA in order to maintain the ecological process and diversity of ecosystem
The Environmental Management Act	The Environmental Management Act No 7 of 2007 aims to promote the sustainable management of the environment and the use of natural resources and to provides for a process of assessment and control of activities which may have significant effects on the environment; and to provide for incidental matters. The acts provide a list of activities that may not be undertake without an environmental clearance certificate.	Legal requirement to undertake an EIA

Legislation	Summary	Applicability
	<p>Further, the Act ensures that;</p> <p>Further, the Act ensures that;</p> <ul style="list-style-type: none"> (a) Potential threats are considered timeously (b) A comprehensive stakeholder’s consultation is conducted, and all Interested and affected parties are given an opportunity to comment on the project (c) Decision are robust by considering the above-mentioned activities. 	
Atmospheric Pollution Prevention Ordinance Act (No.11 of 1976)	<p>This Ordinance serves to control air pollution from point sources, but it does not consider ambient air quality. This ordinance is being repealed by the proposed Pollution Control and Waste Management Bill. Any person carrying out a ‘scheduled process’ which are processes resulting in noxious or offensive gases typically pertaining to point source emissions have to obtain a registration certificate from the Department of Health.</p>	<p>Generation of greenhouse gases by the construction vehicles and bricks manufacturing machine.</p>
Draft Pollution Control and Waste Management Bill	<p>This Bill serves to regulate and prevent the discharge of pollutants to air and water as well as providing for general waste management. The Bill will repeal the Atmospheric Pollution Prevention Ordinance (11 of 1976) when it comes into force. The Bill also provides for noise, dust or odour control that may be considered a nuisance. Further, the Bill advocates for duty of care with respect to waste management affecting humans and the environment and calls for a</p>	<p>Possible fuel spill and leakages may pollute ground and surface water.</p>

Legislation	Summary	Applicability
	waste management licence for any activity relating to waste or hazardous waste management.	
Environmental Policy framework (1995)	This policy subjects all developments and project to environmental assessment and provides guideline for the Environmental Assessment. Its provision mandate that Environmental Assessment take due consideration of all possible impacts and incorporate them in the development or planning stages.	Provision of the EIA and guidelines
The Occupational Safety and Health Act No. 11 of 2007;	<p>Safety: A safety risk is a statistical concept representing the potential of an accident occurring, owing to unsafe operation and/or environment. In the working context “SAFETY” is regarded as “free from danger” to the health injury and to properties.</p> <p>Health: Occupational Health is aimed at the promotion and maintenance of the highest degree of physical, mental and social wellbeing of workers in all occupations. This is done by ensuring that all work-related hazards are prevented and where they occur, managed.</p>	<p>Operating bricks manufacturing machine and equipment has the potential risk of injuries.</p> <p>Provision of clean ablution facility, routine health check-ups for employees, HIV/AIDS awareness etc.</p>
Public Health Act No. 36 of 1919	The Act serves to protect the public from nuisance and states that no person shall cause a nuisance or shall suffer to exist on any land or premises owned	Ensure public safety from noise, dusts and air pollution.

Legislation	Summary	Applicability
	<p>or occupied by him or of which he is in charge any nuisance or other condition liable to be injurious or dangerous to health.</p>	
<p>Water Resources Management Act (2004)</p>	<p>This Act provides a framework for managing water resources based on the principles of integrated water resources management. It provides for the management, development, protection, conservation, and use of water resources. Furthermore, any watercourse on/or in close proximity to the site and associated ecosystems should be protected in alignment with the listed principles.</p>	<p>Ensure well-constructed storm water systems, ensure pollution control mechanism to avoid water pollution</p>
<p>Water Act No, 54 of 1956</p>	<p>This act states that, all water resources belong to the State. It prevents pollution and promotes the sustainable utilization of the resource. To protect these resources, this act requires that permits are obtained when activities involve the following;</p> <ul style="list-style-type: none"> (a) Discharge of contaminants into water sources such as pipe, sewer, canal, sea outfall and (b) Disposal of water in a manner that may cause detrimental impact on the water resources 	<p>Sewerage pipes must connected to the available network system and not dumped into water bodies</p>

Legislation	Summary	Applicability
Petroleum Product and Energy Act No, 13 of 1990	This Act provides a framework for handling and distribution of petroleum products which may include purchase, sale, supply, acquisition, possession, disposal, storage or transportation thereof.	Safe handling of the petroleum products such as fuel and lubricants.
Labour Act No. 11 of 2007	This Act aims to regulate labour in general and includes the protection of the health, safety and welfare of employees. The 1997 Regulations relating to the Health and Safety of employees at work sets out the duties of the employer, welfare and facilities at the workplace, safety of machinery, hazardous substances, physical hazards, medical provisions, construction safety and electrical safety.	Follow legal labour requirements such as safety, remuneration etc.
Regional Council Act, 1992 (Act No. 22 of 1992)	The Regional Councils Act legislates the establishment of Regional Councils that are responsible for the planning and coordination of regional policies and development. The main objective of this Act is to initiate, supervise, manage and evaluate development at regional level.	Observe the regional by laws
Soil Conservation Act No. 76 of 1969	This act promotes the conservation of soil, prevention of soil erosion.	Coordinate movement of construction equipment and delivery vehicles to prevent soil erosion. Ensure conservation of topsoil.
Hazardous Substances Ordinance No. 14 of 1974	This ordinance gives provision to control the handling of hazardous substance in all circumstances, such as manufacturing, imports and exporting of these to ensure human and environmental safety.	Handling of bricks reinforcement additives, fuel and fire risks

Legislation	Summary	Applicability
<p>National Heritage Act No. 27 of 2004</p>	<p>The Act makes provision for the protection and conservation of places and objects of heritage significance and the registration of such places and objects. Part V Section 46 of the Act prohibits removal, damage, alteration or excavation of heritage sites or remains, while Section 48 sets out the procedure for application and granting of permits such as</p>	<p>Bricks manufacturing machines such as excavation of trenches may unearth archaeological material.</p>
<p>Word's Best Practises</p>	<p><i>Precautionary Approach Principle</i></p> <p>This principle is worldwide accepted when there is a lack of sufficient knowledge and information about the possible threats to the environment. Hence if the anticipated impacts are greater, then precautionary approach is applied. In this project, there are no eminent uncertainty however in cases when they arise, this approach should be applied.</p> <p><i>Polluter Pays Principle</i></p> <p>This principle ensures that proponents takes responsibility of their actions. Hence in cases of pollution, the proponent bears the full responsibility to clean up the environment.</p>	<p>Construction and operation of a bricks manufacturing facility particularly in the area with underground water can be detrimental to the underground water resource. Therefore, precaution must be taken when making trenches to build and erect the bricks manufacturing facility.</p> <p>In the event of any pollution of underground water, the proponent must be responsible to compensate for the damages.</p>

6. ROLES & RESPONSIBILITIES

6.1. Environmental Compliance Officer (ECO)

The Ministry of Environment, Forestry and Tourism uphold the responsibility of environmental protection in the country. The Environmental Compliance Officer shall be an appointed Environmental Officer from the Directorate of Environmental Affairs and Forestry delegated to impose compliance as per the provision of the EMA. The ECO may carry out inspections at any given time in order to impose compliance. Depending on his/her work schedule, the ECO shall visit the site at any time for environmental inspections and monitoring.

6.2. The Proponent

Midma Investment cc shall resume the inclusive responsibility of environmental management through acceptable implementation of the environmental management plan. Moreover, it shall be a full responsibility of **Midma Investment cc** to implement the following activities.

- Appoint a site Manager;
- Ensures that all workers and contractors are conversant with the Environmental Management Plan (EMP) and are inducted on safety measures regarding construction and ultimately the operation of bricks manufacturing facility;
- Ensure a safe and healthy working environment;
- Provide workers with appropriate Personal Protective Clothing (PPE);
- Monitor the employees works with regard to safety;
- Ensure good environment performance and compliance;
- Appoint an environmental officer or Environmental Practitioner to carry out environmental audits.

6.3. Site Manager

The Site Manager shall represent **Midma Investment cc**. He/she will be responsible for monitoring daily operations and ensure acceptable adherence of workers and contractors to the EMP. The Site Manager must ensure that a copy of the EMP is available on site at all times and every worker is acquainted with the EMP.

6.4. Employees and Contractors

All stakeholders, especially employees and contractors must;

- Adhere to the EMP;
- Ensure to wear personal protective clothing at all time when working;
- Report worn out PPE and request for replacement;
- Adhere to the company rules and policies.

7. DISCIPLINARY ACTION

The EMP is a legally binding document. Non-compliance to the EMP must result in punishable legal action against the proponent such as;

- Suspension of work;
- Financial penalties.

The disciplinary action shall be determined as per the provision of EMA and relevant statutory framework. Under Section 27 (4), *Any person who contravenes subsection (3) commits an offence and is on conviction liable to a fine not exceeding N\$500 000 or to imprisonment for a period not exceeding 25 years or to both such fine and such imprisonment”.*

8. THE ENVIRONMENTAL MANAGEMENT PLAN

The scope of this EMP is with reference to the EIA of proposed establishment and operation of a bricks manufacturing facility on Portion 554 at Brakwater, Windhoek, Khomas Region. This EMP is structured by considering Social, Environmental, Safety and Occupational Health aspects associated with this project as summarised in **Table 2** below.

Table 4 : Environmental Management Plan (EMP)

Activity	Objectives
A – Staff Induction	Induction
	Communication
B – Health and Safety	General safety at workplace
	Ablution facilities
	Dust and Noise Exposure
C – Pollution and Waste Management	Material waste, domestic waste
	Equipment and vehicle emissions, dust and noise
	Fuel spillage and leakages Oil and lubricant leakages
D – Environment	Soil
	Water
	Biodiversity
	Rehabilitation
E – Cultural Heritage	Archaeological and Heritage
F – Socio- Economic	Employment
	Alcohol and drug abuse
	Working hours
	Capacity building
	HIV / AIDS

SECTION A: STAFF INDUCTION

Table 5. Staff Induction Mitigation Measures

Environmental or Social Aspects	Objective	Proposed Mitigation Measures	Monitoring Indicators	Responsibility
Staff Induction	To ensure that all staff / employees are conversant with the requirements of the EMP	<ul style="list-style-type: none"> • All employees and contractors must undertake an intensive induction course on all the provisions of the EMP. • There must be an annual induction course for all the workers. • New employees must not start work without going through the induction course. 	<p>Induction minutes and attendance register signed by each staff member.</p> <p>Induction report</p>	Management or Site Manager
	Disciplinary	<ul style="list-style-type: none"> • Company must adopt a disciplinary system to discipline staff for non-compliance, such as disposing off waste uncontrollably etc. • Strict measure must be put in place, any employee found 	Disciplinary meetings and actions	Management or Site Manager

Environmental or Social Aspects	Objective	Proposed Mitigation Measures	Monitoring Indicators	Responsibility
		contravening provisions of the EMP, must be granted a warning letter.	Disciplinary letters / Warnings	
	Availability of the EMP on site for ease of reference	<ul style="list-style-type: none"> • Ensure that a copy of the EMP is kept on site and accessible 	Physical view of the EMP	Management or Site Manager
Communication	To ensure effective communication	<ul style="list-style-type: none"> • The project must develop a communication strategy • Correspondences must be in writing. • The contact numbers for the Site Manager must be available displayed onsite in case of emergencies. • There must be an alarm bell for emergency communication. 	<p>Communication Strategy</p> <p>Letters, e-mail, notices, minutes</p> <p>Display of site manager and emergency numbers on site</p>	Management or Site Manager

SECTION B: HEALTH AND SAFETY

Table 6. Health and Safety Measures to be implemented

Environmental / Social Aspects	Objective	Mitigation Measures	Monitoring Indicators	Responsibility
<p>Safety & Security</p>	<p>Adhere to the Health and Safety Regulations, Government Notice 156/1997 (GG 1617).</p>	<ul style="list-style-type: none"> • The proponent must develop a health and safety plan; • A compulsory safety induction course must be given to all employees. • Each employee must be provided with personal protective equipment (PPE) and must be worn at all time during working and when on site. • Ensure all workers must be properly inducted on the dangers of risks associated with the project and the emergency response; 	<p>Health and safety included and reflected in the induction minutes</p> <p>Visual Inspection</p> <p>Visual Signs available</p>	<p>Management or Site Manager</p>

Environmental / Social Aspects	Objective	Mitigation Measures	Monitoring Indicators	Responsibility
		<ul style="list-style-type: none"> • There must be clear health and safety signs at designated sites such as, ASSEMBLY AREA, NO SMOKING “DANGER”, “ENTRANCE PROHIBITED” etc. • Employees must NOT be exposed to noise levels above the required -85dB (A) limit over a period of 8 hours. Should the noise level be higher than 85dB (A), the employer must implement a hearing conservation program such as noise monitoring; • Worker must be provided with appropriate PPE such as industrial earmuffs; • Supply safe drinking water. 	<p>Record of hearing loss</p> <p>Laboratory analysis report</p> <p>Clean tap water</p>	

Environmental / Social Aspects	Objective	Mitigation Measures	Monitoring Indicators	Responsibility
		<ul style="list-style-type: none"> • Adhere to minimum speed limit of 40km • Purchase/hire bricks manufacturing machinery with low noise emission; • Where possible, fit silencers on bricks manufacturing machine exhaust; • Operation must be confined to daytime only (08h00-17h00); 		
Dust / Air Pollution	The reduce fugitive dust from project operation	<ul style="list-style-type: none"> • Bricks manufacturing machine must strictly be restricted within the facility; • Loading/offloading trucks must adhere to the minimum speed limit of 30 or 40km/hour; • Sand heaps must be covered or regularly water sprayed; 	Record of public complaints Workers wearing dust masks and earmuffs.	Management / Site Manager

Environmental / Social Aspects	Objective	Mitigation Measures	Monitoring Indicators	Responsibility
		<ul style="list-style-type: none"> • Inter-lock the site regularly used by loading/offloading purposes, apply dust suppression method such as water spraying where there is loose sand; • Workers must not be exposed to excess dust and should be provided with appropriate PPE such as dust mask and earmuffs; • Adhere to the Labour act, non-toxic human dust exposure levels may not exceed 5mg/m³ for respiratory dust and 15mg/m³ for total dust; 		

SECTION C: POLLUTION CONTROL AND WASTE MANAGEMENT

Table 7. Waste Management Mitigation Measures

Environmental / Social Aspect	Objectives	Mitigation Measures	Monitoring Indicator	Responsibility
Emissions	Reduce greenhouse gas (GHG) emissions from vehicles / machinery	<ul style="list-style-type: none"> • All loading/off-loading trucks and bricks manufacturing machine must be kept in good working condition and serviced frequently to prevent leakage and emission of noxious smoke etc. • Switch off engines when vehicle is not operations 	Vehicle servicing records books Reports of smoke emissions from machinery Visible signs	Management / Site Manager
Waste Generation	To prevent littering	<ul style="list-style-type: none"> • The site must have sufficient wheelie bins and skip containers for onsite waste disposal; • The waste must be segregated and be disposed of at an approved disposal site in Windhoek; • No waste should be buried on site or anywhere in the surrounding; 	Waste bins and skip containers	Management / Site Manager

Environmental / Social Aspect	Objectives	Mitigation Measures	Monitoring Indicator	Responsibility
		<ul style="list-style-type: none"> • Acts of secretion in the open must never be allowed. 		
Surface and ground water contamination / pollution	To prevent soil and water pollution	<ul style="list-style-type: none"> • All vehicle including loading/off-loading trucks to be used for transportation of raw materials and concrete materials must be in good condition and well service to avert leakages of oils and lubricants; • All stationary vehicles as whereas the bricks manufacturing machine must have drip trays to collect leakages of oils and lubricant; 	Service records Visible drip trays	Management / Site Manager

Environmental / Social Aspect	Objectives	Mitigation Measures	Monitoring Indicator	Responsibility
		<ul style="list-style-type: none"> • Oils, lubricants and hydrocarbons must be stored in a proper storage facility with concrete bunds or impermeable lined materials. • Although not expected to be momentous, i.e oil drops of less than 500ml, if it occurs, contaminated soils must be collected and be treated with bioremediation waste 	<p>Proper storage with concrete bund surface</p> <p>Bioremediation chamber</p>	
Oil Spillages	To prevent oil spill from tanks and during re-fuelling	<ul style="list-style-type: none"> • Refuel vehicles at designated filling stations in Windhoek that has protected surface covering /geomembrane lining. • Engage the suppliers of consumable such as grease and lubricants upon used to collect and dispose of such waste in an environmentally friendly manner. 	Place warning signs	Management / Site Manager

Environmental / Social Aspect	Objectives	Mitigation Measures	Monitoring Indicator	Responsibility
Oil leakage	To prevent fuel leakages	<ul style="list-style-type: none"> All stationary vehicles as well as the bricks manufacturing machine must have drip trays to collect leakages of oils and lubricant; 	Visible monitoring	Management and Site Manager

SECTION D: ENVIRONMENT

Table 8. Environmental Mitigation Measures to be implemented

Aspect	Objective	Mitigation Measure	Monitoring Indicator	Responsibility
Biodiversity	To protect the flora and fauna	<ul style="list-style-type: none"> • Prevent the destruction of protected species in the surrounding area. • Prevent the employees from collecting firewood in the vicinity. • No workers should be permitted to collect plant materials. • Provide microwave powered with electricity to staff intending to warm their food during lunch time. • No killing of animals including crawling animals unless it poses danger to human life. • No domestic animals such as; dogs are allowed at the site. 	Complaints on wildlife poaching	Management / Site Manager
Soil Erosion	To prevent soil erosion	<ul style="list-style-type: none"> • Movement of all construction vehicles during must strictly be within the project site; • Sand and aggregate heaps should be placed in designated areas. 	Soil profile measurements	Management / Site Manager

Aspect	Objective	Mitigation Measure	Monitoring Indicator	Responsibility
		<ul style="list-style-type: none"> Keep the facility tidy and free of litters. 		
Soil Compaction	To prevent soil erosion at the facility.	<ul style="list-style-type: none"> Its encouraged that the area regularly used by vehicle during construction phase should be watered and post construction the area must be inter-locked with proper stormwater drainage. 	Soil erosion record	Management / Site Manager
Water Resource	Conservation of water	<ul style="list-style-type: none"> The bricks manufacturing facility must be connected to the existing NamWater pipeline network. Honour all rate and taxes payment including water bills. Recycle water and encourage the re-use of water that can be used. Monitor and control water usage and minimise if possible. 	Proof of payment.	Management / Site Manager
Visual and Sense of Place	Maintain aesthetic value	<ul style="list-style-type: none"> Care must be taken to ensure that bricks manufacturing facility blend in with the existing facility. Keep site visual clean. 		

Aspect	Objective	Mitigation Measure	Monitoring Indicator	Responsibility
Alien Invasive	Maintain natural ecosystem	<ul style="list-style-type: none"> All alien invasive occurring in the area should be cleared. Place measures in place to eradicate any alien infestation in the facility. Adopt an alien clearing policy and awareness campaign. 		

SECTION E: HERITAGE AND ARCHEOLOGICAL SITES

Table 9. Archaeology and Heritage Mitigation Measures

Environment / Social Aspect	Objectives	Mitigation Measure	Monitoring Indicator	Responsibility
Heritage Resources / Artefacts	Preserve Heritage and Archaeological materials	<ul style="list-style-type: none"> The management should be made aware of the provision of the National Heritage Act regarding prompt reporting of any archaeological findings. Workers must be trained on the possible find of archaeological material in the area particularly during construction; 	Sighting report/s of heritage resources / artefacts	Management / Site Manager

Environment / Social Aspect	Objectives	Mitigation Measure	Monitoring Indicator	Responsibility
		<ul style="list-style-type: none"> • Implement a chance find and steps to be taken when archaeological material finding (Heritage e.g. rock painting and drawings), human remains or artefacts) are unearthed. • Stopping the activity immediately • Informing the site manager or supervisor • Barricade the area with a danger tape and the manager shall take appropriate pictures. • Site manager must report the finding to the nearest Namibian police or alternatively the National Forensic Laboratory (+264 61 240461). 		

SECTION F: SOCIO ECONOMIC

Table 10. Social Economic Mitigation Measures

Environmental / Social Aspects	Objectives	Mitigation Measures	Monitoring Indicator	Responsibility
Employment	Promote benefits to the local resident	<ul style="list-style-type: none"> • Adopt a local first policy to ensure that all general work is reserved for local people unless in circumstances where specialized skills are required. • Employ local contractors • Fair compensation and labour practise as per Namibian Labour Laws must be followed. 	Employee structure and proportion of local employment	Management or Site Manager
HIV/AIDS	To prevent the spread of HIV/AIDS	<ul style="list-style-type: none"> • Provide HIV / AIDS awareness at induction. • Avail condoms at site. 	HIV Infection rate/ Pregnancy	Management or Site Manager
Alcohol and Drug use	Prevent alcohol and drug use	<ul style="list-style-type: none"> • Prohibit the use of alcohol and drugs at workplace. • Impart employees about dangers alcohol and substance abuse 	Drunk / Misbehaving employees Breathalyser report	Management or Site Manager

Environmental / Social Aspects	Objectives	Mitigation Measures	Monitoring Indicator	Responsibility
		<ul style="list-style-type: none"> Employees must be randomly screened with the breathalyser to avoid intoxicated personnel on site 	Monitor presence of alcohol at the construction site	
Working hours	Adhere to the Labour Act No. 11 of 2007	<ul style="list-style-type: none"> Operate within the prescribed working days and hours as per the Namibian Labour laws and regulations 	Labour unrest / Demonstration	Management or Site Manager

9. DECOMMISSIONING PHASE

The decommissioning of the bricks manufacturing facility is not considered at this stage. However, in the event where the project has to be decommissioned, all the necessary application required from the relevant authority will be applied for. A qualified personnel must be contracted to develop and establish a decommissioning plan. Consequently, the project proponent must put in place the following mitigation measures;

- The proponent must submit a decommissioning plan to the office of the Environmental Commissioner for approval;
- Erect signs to inform the public about the decommissioning of the project;
- Access to the areas must be controlled;
- A qualified project personnel must be hired to oversee the project decommissioning
- Hire environmental specialist to monitor possible soil and water contamination during decommissioning;
- Provide workers with all necessary PPE;
- Generated waste must be disposed of at approved landfill sites in Windhoek;

10. CONCLUSION AND RECOMMENDATIONS

The proposed establishment and operation of a bricks manufacturing facility is a listed activity according to EMA, may not be undertaken without a valid ECC. A development of this magnitude may resonate in localised impacts to the bio-physical environment. The proposed development had different components that were assessed for possible environmental impacts. Most of the potential negative impact can be reduced to insignificance levels if the mitigation measure outlined in this EMP are properly applied.

All the likely impacts were identified, and mitigation measures suggested were recognised with high confidence.

The information provided and environmental set up of the proposed development are acceptable, therefore, it is recommended that the Environmental Clearance Certificate shall be issued to necessitate the commencement of the proposed establishment and operation of a bricks manufacturing facility on Portion 554 at Brakwater, Windhoek, Khomas Region. It is encouraged that regular monitoring must be put in place to address and mitigate the impact which may result due to continuous changing environment. The proponent must appoint an Environmental Practitioner of his choice to successively carry out environmental audits for the purpose of submitting the audit report to the office of Environmental Commissioner.