

ENVIRONMENTAL MANAGEMENT PLAN FINAL

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Acronyms

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

1. CHAPTER ONE: BACKGROUND

1.1. INTRODUCTION

Powercom (PTY) LTD herein referred to as the proponent has identified different areas in Namibia that needs improved communication alternatives due to growth in population and economic activities. To achieve the objective of improved telecommunication connectivity, Powercom intends to establish telecommunication towers across the identified different locations. One of the identified areas that needs a telecommunication mast is Veddersdal in Okahandja.

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

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

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

1.2. PROJECT LOCATION

The project site is located in Veddersdal Suburb in Okahandja, Otjozondjupa Region-Namibia. The Locality Map Fig 1) gives a local layout view of the project site:

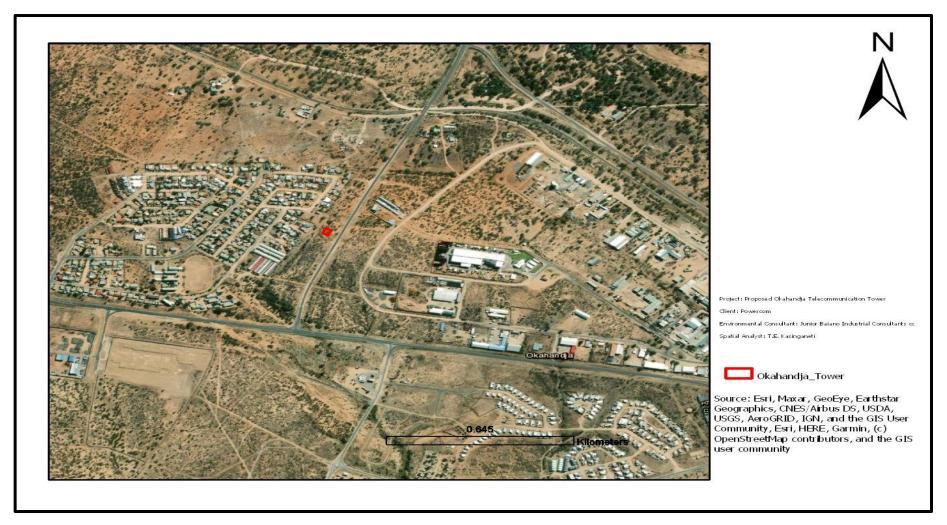


Figure 1: Proposed Project Site

1.3. PURPOSE OF THE ENVIRONMENTAL MANAGEMENT PLAN (EMP)

This EMP has been developed for the construction and operation of Veddersdal tower in Okahandja. It forms the operational framework within which the proposed project is to operate within. All anticipated environmental and social impacts identified in the environmental scoping report are addressed, with a mitigation action, monitoring requirements, key indicator and responsibilities.

This EMP is incessant, and it requires compliance monitoring, updating and or amendment if the scope of operations change. All personnel working on the project will be legally required to comply with the standards set out in this EMP.

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

- To prevent negative impacts where possible;
- Reduce or minimise the extent of impact during project life cycle;
- Prevent long-term environmental degradation.
- Ensure public safety and health is protected.

1.4. LEGAL AND OTHER REQUIREMENTS COMPLIANCE

This report presents the EMP and has been undertaken in accordance with the requirements of the Environmental Management Act, No. 7 of 2007 and the Environmental Assessment regulations of 2012.

As such, key requirements in accordance to this Act, classifies the proposed project as listed and invokes the need for an environmental management plan to sustainably implement this project. However, legal compliance is not only limited to the EMA, but also applies to all applying legal requirements identified in the ESR. When licenses are required such as wastewater discharge, the proponent should ensure that all licenses and permits are obtained and fulfilled as per conditions.

1.5. EMP ADMINISTRATION

There is a strong need to clearly outline the roles and responsibilities of all stakeholders to ensure that the EMP is fully implemented. There is also a need for the proponent to appoint an overall responsible person (Site Manager) to ensure the successful implementation of the EMP.

It solely remains the responsibility of Powercom to ensure;

- That all members of the project team, including contractors, comply with the procedures set out in this EMP;
- That all personnel are provided with sufficient training, supervision, and instruction to fulfil this requirement; and
- Ensuring that any persons allocated specific environmental responsibilities are notified of their appointment and confirm that their responsibilities are clearly understood.

2. CHAPTER THREE: ENVIRONMENTAL MANAGEMENT PLAN (EMP)

2.1. INTRODUCTION

The proposed project will have environmental impacts as indicated in the Environmental Scoping Report. This section is aimed at describing The Environmental Management Plan (EMP) for impacts associated with the proposed tower. The EMP stipulates the management of environmental programs in a systematic, planned and documented manner. The EMP below includes the organizational structure, planning and monitoring for environmental protection at the proposed farm area development and other areas of its influence. The aim is to ensure that the proponent maintains adequate control over the project operations to:

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

2.2. EMP ADMINISTRATION

There is a strong need to clearly outline the roles and responsibilities of all stakeholders to ensure that the EMP is fully implemented. There is also a need for the proponent to appoint an overall responsible person (project manager) to ensure the successful implementation of the EMP as highlighted below:

Table 1: Roles and Responsibilities in EMP Implementation

ROLE	ENVIRONMENTAL RESPONSIBILITIES					
Site Manager	Responsible to enforce EMP implementation to contractors					
Environmental Control Officer	Implement, review and update the EMP.					
(ECO)	• Ensure all reporting and monitoring required under EMP is undertaken, documented and					
	distributed as needed					
	 Conduct environmental site training (tool box talks) and inductions 					
	 Conducts environmental audit at work site with the support of environmental consultant. 					
	Close out all non-conformances.					
	 Ensure materials being used on site are environmentally friendly and safe. 					
The Department of Environmental	Approve the EMP and any amendments to the EMP.					
Affairs	 Approve reports of environmental issues and non-conformances as issued. 					
	 Review and approve environmental reports submitted as part of EMP implementation 					
Contractor	Control and monitor actions required by the EMP.					
	 Report all environmental issues to Environmental Control Officer 					
	 Ensure documented procedures are followed and records kept on site. 					
	• Ensure any complaints are passed onto the management within 24 hours of receiving the					
	complaint.					
Workers	Follow requirements as directed by site engineers.					
	• Report any potential environmental issues to contractor manager/Site Manager, indicating spilt					
	oil, excess waste, excessive dust generation, dirty water running off the site and other possible					
	non-conformances					

Table 2 : Construction and Operation EMP (C&O EMP)

Impact	Description	Effects	Class	Time	Responsibil	Action	Phase
				frame	ity		
Noise	Noise will be generated	- The health of working	Environmental	4-6 months	-Environmental	- A construction interval will be	Construction
pollution	through:	personnel could be			Control Officer	established, used and adhered to.	&
	-Construction activities	disturbed.			-Site Manger	- Workers will be issued earplugs to	Operation
	-Moving vehicles.	- Community residents				protect them from excessive noise.	
		could be disturbed by				- Public will be notified through printed	
		the noise.				timetable stating planned operational	
		- General annoyance				activities.	
		-Driving away of local				- Construction activities will be	
		animals' species near				conducted during daytime.	
		the project site				-Site notices will be erected on, around	
						the site-notifying visitors, and nearby	
						residents of different hazards on site.	
						-No go areas marked as sensitive	
						environments, especially for birds	
						needs to be avoided during	
						construction and operation.	
Dust	Dust will accumulate because	- Can lead to respiratory	Environmental	6-8 months	-Environmental	- Dust suppression will be done through	Construction
Generation	of the land preparation, onsite	illnesses especially to			Control Officer	watering dust sources surfaces.	& Operation
	movements of vehicles and	those working in the			-Site Manager	-Watering down dusty surfaces,	
	machines, wind blowing on	area.				-Ensure that protective equipment such	
	loose material during	- General air pollution.				as respirators are distributed to	
	construction and tipping.	-Nuisance to nearby				employees, and ensure their use.	
		residents				-Site notices to be erected on and	
		-The process can also				around the site to inform visitors and	
1		drive away wild animals				surrounding residents.	

Impact	Description	Effects	Class	Time	Responsibil	Action	Phase
				frame	ity		
		within the project area					
		surroundings					
Loss of	-Vegetative plants on site will	-The clearing of	Environmental	Construction	-Environmental	- The proposed project area is already	Construction
Biodiversity	be removed	vegetation will result in		phase	Control Officer	disturbed, hence there is little	
	-Habitat destruction for both	the breaking of the			-Site Manager	vegetation to be affected by the	
	ground dwelling species and	ecosystem processes in				development.	
	tree dwelling species.	the area.				- Ground disturbance will only be	
	-Soil disturbance on and	-Loss of aesthetic value				limited to the boundary area to avoid	
	around the site.	of the proposed project				affecting a large area.	
		area.				-Upon completion of construction	
		-The few small animals				activities more regreening of the	
		still habiting the place				construction footprint affected area is	
		such as small rodents				recommended. A local landscaper can	
		and birds will be forced				be engaged.	
		away.					
Greenhouse	Green House Gasses (GHGs)	-Global climate change	Environmental	Construction	-Environmental	-Adopt the use of ethanol blended fuels	Construction
gas emissions	emissions will be produced	- Air pollution		phase	Control Officer	wherever necessary.	&Operation
	from the following activities:				-Site Manager	-Design an operation system that cuts	
	Fuels combustion for				-Department of	on fuel consumption.	
	(construction				Environmental	- Use of solar energy system during	
	vehicles and				Affairs.	construction for lighting and other minor	
	equipment)					energy needs.	
	Ground excavation						
	releases phosphorus						
	found underground						
	and releases						
	particulate matter into						
	the atmosphere.						

Impact	Description	Effects	Class	Time	Responsibil	Action	Phase
				frame	ity		
Waste	-Construction and operation	-Pollution from oil spills	Environmental	Construction	-Environmental	- Ensure that all waste from	
Generation	are associated with a lot of raw	resulting from the		phase	Control Officer	construction activities is stored and	
	material and activities that	handling of various			-Site Manager	contained in designated containers and	
	results in pollution	machineries used during				transported to an approved waste	
	-The construction and	the construction phase				disposal site.	
	maintenance activities may	-Construction rubble,				-Bulky waste such as building rubbles	
	generate e-waste and this	empty packaging				must be collected and disposed of for	
	needs to be disposed of in a	containers/bags and				landfilling.	
	sustainable manner.	materials remnants.				-Visual inspections monitoring	
Safety and	Construction related Safety	-Injuries to workers such	Health and	Construction	ECO	- Equip workers with Personal	Construction
Health risks	and Health hazards	as Occupational	safety	phase		Protective Equipment (PPE), provide	and operation
		dermatitis, slips and fall				trainings on how to effectively use the	
		of humans and objects,				PPE.	
		musculoskeletal				-Provide platforms for briefings and	
		disorders, etc.				meetings about possible safety and	
						health hazards in the work place	
						-Provide site signs warning and	
						informing about different hazards on	
						site.	
	Electrical hazards	-Fatalities and fires	Health and	Construction	ECO	-Employees should be trained on	Construction
			safety	and operation		electrical safety before working on site.	and
						-Safety representative with training on	Operation
						electrical hazards emergency	
						management should be station on site	
						always during construction	
						-Safety signs during construction and	
						operation should be put on site, no go	

Impact	Description	ption Effects Cla	Class	Time	e Responsibil	Action	Phase
				frame	ity		
						areas should be labelled, PPE	
						specifications should be clear to	
						maintenance personnel.	
	Radiation (Non Ionizing)	Carcinogenic	-Health	Permanent	-Environmental	-There are studies that indicate	Operation
		consequences	-Social		Control Officer	potential of radiation from cell phone	
					-Site Manager	towers to have carcinogenic impacts	
						after prolonged exposure.	
						-However, the tower is sited at most 5m	
						away from residential households and	
						there is no prolonged exposure to	
						anyone.	
						-PowerCom will secure the BTS	
						perimeter to ensure that no one is	
						always in proximity to the tower without	
						pre-approval.	
	Avifauna	-Bird fatalities	-Environmental	Permanent	-Environmental	-New towers must be built below 60m	Operation
					Control Officer	height to avoid bird fatalities.	
					-Site Manager	-Construct unguyed towers with	
						platforms that will accommodate	
						possible future co-locations and build	
						them at existing 'antenna farms', away	
						from areas of high migratory bird traffic,	
						wetlands and other known bird areas.	
						-Where towers over 60m are	
						absolutely necessary, use the minimum	
						amount and intensity of lighting allowed	
						under FCC regulations.	

Impact		Description	Effects	Class	Time	Responsibil	Action	Phase
					frame	ity		
							-Minimize the tower 'footprint' on newly	
							constructed towers.	
							-If the tower is decommissioned, it	
							should be removed as soon as	
							possible.	
							-Use visual daytime markers in areas of	
							high diurnal birds.	
							-Security lighting for on-ground facilities	
							should be minimized, point downwards	
							or be down-shielded.	
							-Conduct on-site bird fatalities	
							monitoring on the tower at least every	
							month.	
							-The use of white strobes results in less	
							circling behavior by nocturnal migrants	
							and thus fewer mortalities than red	
							pulsating lights.	
		Air Transport	-Air transports impacts	-Socio-	Permanent		-The towers should comply with	Construction
				economic			aviation guidelines so that they do not	and operation
							impact air transport systems.	
							-Air traffic visibility systems such as	
							lighting at the tip of the tower.	
							-The towers should be designed so that	
							they are visible to birds.	
Land	use	-There will be change in land	-The area will no longer	-Social	Permanent	-Environmental	-The development should blend into the	Construction
change		use and visual aesthetics	be suitable for	-Terrestrial		Control Officer	existing area through designing and	and operation
			agriculture.	environment		-Site Manager	colour coding.	

Impact	Description	Effects	Class	Time	Responsibil	Action	Phase
				frame	ity		
		-Sudden change in				-Green designing will bring life to the	
		landscape appearances				site and blend with surrounding areas.	
		may be unfavourable to					
		the conservatives.					
Positive Impacts	S		I				
Employment	The development provides an	- Improves disposable	Socio-economic	Project life	-Site Manager	- Work with local leadership (councillor)	Construction
creation	opportunity of outsourcing	income to those		time		on acquiring non-skilled labour from the	and operation
	work	employed and their				residents.	
		immediate families.					
Business	-Raw materials acquiring and	-Local suppliers will be	-Socio-	Construction	-Site Manager	-The proponent will outsource most of	Construction
linkages	contracting companies provide	presented with an	economic	phase		its materials and services from	and operation
	an opportunity for businesses.	opportunity to empower				Okahandja	
		their businesses.					
		-Construction workers					
		can be provided with					
		accommodation, food					
		and services from the					
		local community					
		increasing business					
		activities.					
Infrastructure	The development presents a	-Improvement in	-Socio-	Construction	-Site Manager	-The new tower should cover a larger	Construction
development	unique opportunity for	connectivity.	economic	phase		area, and they should also consider	and operation
	infrastructure development in	-Development of the				provision of infrastructure platform to	
	Namibia.	facilities will also pave				other smaller companies such as	
		way for future				security companies.	
		developers to grow					
		interests in the area and					
		result in ripple effects					

Impact	Description	Effects	Class	Time	Responsibil	Action	Phase
				frame	ity		
		and quick growing of the					
		area.					

3. CHAPTER FOUR: CONCLUSION AND RECOMMENDATIONS

3.1. RECOMMENDATION FROM ENVIRONMENTAL ASSESSMENT PRACTITIONER

Based on the information provided it is the opinion of JBIC CC that no fatal flaws have been identified for the proposed development and that the information contained in this report is sufficient enough to allow DEA to make an informed decision.

Junior Baiano Industrial Consultants cc therefore recommends that Environmental Clearance be granted for the proposed development based on the following recommendations:

- The proposed activity is not anticipated to have significant environmental impacts.
- There is however a visual impact.
- The following recommendations should be implemented in order to ensure that potential impacts associated with the establishment and operation of the site are minimised:
 - i. Any areas disturbed during construction and operation must be rehabilitated.
 - ii. The structure is to be removed when the structure ceased to be used for telecommunications purposes and the site rehabilitated.
 - iii. Construction to take place during working hours.
 - Trampling and disturbance associated with construction should be limited to within 5m (five metres) of the footprint of the site.
 - v. On completion of the project all litter and construction debris shall be immediately removed from the site.
 - vi. Mitigation measures to reduce the potential visual impact should be implemented as far as possible.

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