

Annexure A

ENVIRONMENTAL MANAGEMENT PLAN FOR THE ESTABLISHMENT, OPERATION AND DECOMMISSIONING OF A LANDFILL SITE IN LISELO AREA, KATIMA MULILO, ZAMBEZI REGION

**PREPARED
FOR
KATIMA MULILO TOWN COUNCIL**



COMPILED BY



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1. Introduction

1.1 Background

The Katima Mulilo Town Council (KMTC) intends to establish a new landfill site that will serve the Katima Mulilo Town and surrounding areas. The proponent has committed to implement a new waste management approach geared towards implementing an integrated solid waste management system premised on its principles and contemporary practices. Therefore, this environmental management plan is for the project, “the establishment and operation of a waste management facility in the Liselo area” by the Proponent.

1.2 Objective of the EMP

Environmental management plans are developed to set a framework upon which to manage identified significant impacts from envisaged activities. An EMP outlines measures towards environmental protection from adverse impacts whilst enhance the positive outcomes throughout the phases of the project from planning to closure. Therefore, the objective of this document is to outline a plan of action to mitigate and manage significant impacts on the surrounding environment and communities from the implementation of the envisaged activity of establishing and operating a landfill site in the Liselo area.

2. Format of the of EMP

There is no specific format for an environmental management plan, however the following are necessary components;

- A description of the roles and responsibilities critical to the implementation of the EMP
- Applicable legislation and specific requirements
- All the environmental activities, mitigation and control measures that will be used to prevent or minimise negative impacts and enhance beneficial impacts
- Mechanisms for monitoring compliance with the EMP and reporting
- Method of monitoring and auditing environmental management practices during all phases of development

3. Roles and Responsibilities

The overall responsibility for full implementation of the EMP rests with the Proponent who shall appoint key personnel for the implementation of the EMP. Therefore, the following roles and responsibilities are obligatory to implementation of this EMP;

- The Proponent Representative (PR)
- Environmental Compliance Officer (ECO)
- Site Manager
- Site workers (waste pickers/sorters and guards)
- Contractors and subcontractors

3.1 Proponent Representative (PR)

The Proponent is custodian of the entire EMP and its full implementation, however, an institution such as a local authority comprises several departments led by managers under their accounting officer, it is therefore, ambiguous to generally place this responsibility under reference of the title proponent as such place no accountability to the implementation of the EMP. It is imperative that a department is identified and appointed as the custodian of the EMP within the existing structures of the Proponent.

Since waste management services are under the Community Development Division, the manager of the department is the suitable appointee as the Proponents Representative (PR). Their role shall be to administer the overall implementation, monitoring, review and updating of the EMP.

The representative is at a level of management to enable bring about attention to critical matters related to the implementation of the EMP, whilst plan and secure resources required to comprehensively implement the EMP. The following responsibilities rests on the PR;

- Ensure the implementation of all requirements of the EMP
- Source and secure resources required from the proponent for the implementation of the EMP.
- Keep the entire management constantly informed of the implementation of the EMP and all matters relating to its monitoring, review and update.

3.2 Environmental Compliance Officer (ECO)

The ECO is the implementing arm of PR position. This position is a requirement in the implementation of an integrated waste management system. It requires specific knowledge in the field of environmental management to comprehensively ensure implementation of the EMP and compliance to established environmental requirements set. Specific responsibilities will include;

- Monitor the entire waste management process to ensure that established protocols and standards are adhered by contractors, subcontractors and other parties involved in the waste management chain.
- Establishing and maintaining an information record system for the entire waste management system.
- Liaise with relevant authorities and contractors regarding compliance to legislation
- In collaboration with the EHO ensure compliance to health and safety standards.
- Conduct environmental audits and monitoring of environmental factors as established in EMP and reporting.
- Providing recommendations for remedial action in the event of any non-compliances.
- Assist in the assessment and review of Contractor's performance
- Ensure adherence to the site layout plan and design.
- Ensure that contractors, subcontractors and workers and even official visitors to the site are aware of the environmental and health and safety conduct required.
- Ensure that the site is utilised as per set out layout plan
- Implementation of the rehabilitation or decommissioning plan.
- Develop training and awareness programs on waste management
- Engage media, and public institutions and publicise environmental information related to waste in and around the town.

3.3 Site Manager

The daily operation of the site requires that there is constant coordination of the operations to align with the site utilization plan and implementation of the EMP. It is required that a position of 'Site Overseer' also referred as site manager is appointed to coordinate and

oversee operations on day to day basis. This role is required throughout the process of establishing, operation and decommissioning of the site although it may be fulfilled by different individuals at each progressive phase envisaged for the site.

Should site management resort under a contractor on behalf of the Proponent, the Site Manager/Overseer shall be appointed by the respective contractor at each phase. The appointee shall;

- Ensure that all staff remain within the boundaries of the site, and that all works align with the site layout plan.
- All operational activities onsite relating to the handling and treatment of waste are in accordance to EMP.
- All site staff or workers conduct their activities in accordance with specifications set out in the EMP.
- Ensure that any subcontractors or visitors to the site are made aware of the requirements set in the EMP at all times.
- Ensure records are kept as required and continuously updated.
- All site incidents are recorded, appropriate measures taken and progressive actions put in place to ensure non-recurrence.

3.4 Employees/Site workers

Employees expected onsite include guards, pickers/sorters of waste, machine operator. Site employees retain responsibility to adhere to operating protocols related to safety and healthy, whilst also ensuring that their activities align to the implementation of the measures in the EMP.

3.5 Contractors and subcontractors

Contractors and subcontractors comprise those that will provide a certain service to the proponent that may be managing in part or whole of the entire waste management process.

4. Review of Legal Framework

The following legislative instruments are relevant to the project

Legal Instrument	Specific Reference	Applicability
Namibian Constitution (1990)	Article 95 (i) on maintenance of ecosystems, essential ecological processes and biological diversity of Namibia and utilization of living natural resources in a sustainable way for the benefit of all Namibians, both present and future.	Resonances a high level of environmental sensitivity
Environmental Management Act No. 7 Of 2007 And Environmental Impact Assessment Regulations GN 30 of 2012	The Act and its regulations provides for a process of assessment and control of activities which may have significant effects on the environment.	EIA process, public consultation, environmental management plans.
Water Act No. 54 Of 1956 (The Water Resources Management Act No 11 of 2013)	The Acts provides for the overall protection of surface and groundwater resources from unsustainable uses and potential pollution.	Wastewater handling and treatment requires a permit. Take necessary measures to prevent the pollution of the groundwater resources
Labour Act of 2007	The objectives of the Act are to ensure the health, safety and welfare of employees but also outlines the rights and obligation of employers.	The health and safety of workers throughout the waste management chain is to be assured by proponent, contractors and subcontractors.
The National Heritage Act (No. 24 Of 2004)	Provides for prohibition on removing or demolish, destroy or despoil, develop or excavate all or part of a protected	If a heritage site or archaeological site during operations, (e.g. a grave or stone markings) is

	place. Such can be only conducted under provisions of an exemption or under a permit issued by the council.	uncovered or discovered the prescribed procedures need be adhered to
Soil Conservation Act 76 of 1969	Provides for combating and preventing soil erosion, and for the conservation, protection and improvement of the soil, the vegetation and protection of water sources.	Ensure project designs consider soil stability to prevent erosion processes.
Atmospheric Pollution Prevention Ordinance 11 of 1976	Provides for prevention of noxious gases and excessive dust, where steps are prescribed or (where no steps have been prescribed) adopt the best practicable means for preventing dust from becoming so dispersed or causing nuisance.	necessary measures need be taken to ensure release of noxious gases and dust is minimized in proximity to human settlement areas and prevent pollution
Hazardous Substances Ordinance 14 of 1974	The Act provide for the control of substances which may cause injury or ill-health to or death of human beings by reason of their toxic, corrosive, irritant, strongly sensitizing or flammable nature or the generation of pressure.	Restriction on import, storage and sale of certain groups of substances declared hazardous without a permit.
Public and Environmental Health Act (No.1 Of 2015)	Provides a framework for a structured uniform public and environmental health system	Gives powers to local authorities to handle waste management functions but also provides from ensuring public health
National Solid Waste Management Strategy	Strengthen institutional and legal framework for management of solid waste serving as a guide to institutions such as local authorities on sound waste management practices.	A guide to align waste management activities

Nature Conservation Ordinance (No. 4 Of 1975) and It Amendment Act of 1996	Prescribes specially protected and protected wildlife and requirements and provisions for dealing with wildlife matters.	where it is necessary to handle and deal with wildlife, the act prescribes requirements.
Forest Act of 2001	Provides prohibition on cutting or removal of vegetation within specified zones and lists protected plants.	determine plants of the area and accord prescribed requirements
Pollution Control and Waste Management Bill	This Bill serves to regulate and prevent the discharge of pollutants to air and water as well as providing for general waste management. This Bill will license discharge into watercourses and emissions into the air. The Bill also provides for noise, dust or odour control that may be considered a nuisance.	Proactively consider the implications of requirements on the envisaged activity and align accordingly.

5. Environmental Management Program

The EMP is divided into phases; Pre-construction, Construction, Operation and Decommissioning in the management of all identified significant aspects or impacts. The table below provides specifications throughout the phases of the establishment, operation and decommissioning of the new landfill site in the Liselo area for the Katima Mulilo Town Council.

Aspect/Impact	Management Objective	Management/Mitigation Action	Frequency	Indicator	Responsible Party
Pre-construction					
Final Site layout Plan	All envisaged phases align to the site layout plan	<ul style="list-style-type: none"> o Ensure that site layout plan is approved. 	Once off	Approved final site layout	EIA Consultants
Site layout demarcation	All site layout areas are clearly marked out.	<ul style="list-style-type: none"> o Delineate the areas as per site layout plan o Place signage to mark demarcated areas as per final site layout plan 	Once off	Site markings & signage as per layout plan	ECO & Site Manager
Construction Phase					
Clearing of sensitive/protected vegetation	Minimal removal of protected plant species	<ul style="list-style-type: none"> o Identify healthy protected trees and mark them to avoid removal o Fence perimeter path to consider the location of healthy protected trees to avoid their removal. o Ensure that all trees marked for avoidance are known to site workers. 	Throughout construction phase	Marked trees	ECO
Site surroundings littered with construction waste	The surroundings are kept free of any litter	<ul style="list-style-type: none"> o Designate specific points for disposal of construction waste materials and other unusable substances brought to site. o Place signage on disposal points for visibility. o Good housekeeping practices are required. 	<p>Daily clean-up of generated waste to disposal points</p> <p>Once off induction of construction</p>	<p>Designated disposal points.</p> <p>Site clear of any signs of litter and well maintained</p>	ECO/Site Manager

		<ul style="list-style-type: none"> ○ All loose materials and packaging from all site activities collected and disposed at specific designated points. ○ All contractors and their workers to be inducted of the required good housing keeping practices. ○ Assign responsibility to monitor housekeeping practices. 	<p>teams on required practices.</p> <p>Weekly walkabouts</p>		
Dust generation	Extent of dust spread kept minimal	<ul style="list-style-type: none"> ○ Activities with high dust generation potential to be avoided under high windy conditions. ○ Roads leading into the site to be sprayed using a water tank during dry periods of the year. ○ Vehicular speed inside the site be reduced to maximum of 40km/h. ○ Avoid unnecessary movement of construction vehicle ○ Construction work limited to normal working hours (7am to 5pm). 	<p>Continuous aligning of operations with weather conditions</p> <p>Weekly watering of roads in drier times.</p> <p>Site inspections of operations</p>	<p>Site records</p> <p>Speed regulating signage.</p>	<p>Site Manager/ECO</p>
Noise and vibrations	Restrict noise and vibration to working hours.	<ul style="list-style-type: none"> ○ Restrict working time to normal working hours (7am to 17h00). ○ Regular servicing of vehicles and machines to remove excessive noises 	<p>Continuous</p>	<p>Site operational records</p>	<p>Site Manager</p>

Release of noxious gases into the environment	Reduce the release of noxious gases into the atmosphere	<ul style="list-style-type: none"> ○ Regular servicing of vehicles to minimize the release of noxious gases. ○ No unnecessary operation of machines/vehicles. 	Continuous	Service records	Site Manager/ECO
Accidental leakage or spill of oils/fuels onto soils/groundwater	Preservation of groundwater resources from pollution	<ul style="list-style-type: none"> ○ Use of trays when fuelling to prevent spillages to the ground. ○ Fuelling activities to be monitored by experienced persons onsite. ○ Vehicles be checked regularly in the morning for signs of leakages/drippings and effect corrective action where necessary. ○ Any fuels and oils brought to site must be locked away and register for access kept. 	Throughout the phases	<p>Site drip trays</p> <p>Site Incident reports</p> <p>Site operational records</p>	Site Manager/ECO
Health and Safety of construction workers	Preservation of the safety and health of the workers	<ul style="list-style-type: none"> ○ Provision of Personal Protective Equipment (PPE) such as safety shoes, gloves, goggles and overalls to all employees; ○ No employee must be allowed in working areas without necessary PPE ○ Operations should be restricted between 07H00 to 17H00. ○ All contractors required to ensure they conduct basic first aid and safety awareness training for its employees. 	Continually	<p>Records of awareness or trainings</p> <p>General caution signage</p>	Site Manager/ECO

		<ul style="list-style-type: none"> ○ Site movement to minimized and controlled ○ Signage be placed where heavy machines will be actively working ○ No authorized persons should be allowed onsite. ○ Any persons authorized but unfamiliar with operations to be accompanied. 			
Covering of the hand dug well water source	Continued access to water for livestock and nearby communities	<ul style="list-style-type: none"> ○ Provide alterative drinking water point for dependent nearby community and livestock. 	Once off	Established water point	PR
Potential pollution of groundwater from wastewater generated	Preservation of groundwater resources from pollution	<ul style="list-style-type: none"> ○ Use of mobile ablution facilities in the initial phase. ○ Weekly pumping of effluent and transportation to the towns wastewater facilities for proper handling and treatment. 	Weekly monitoring of emptying of holding tanks	Mobile ablution facilities onsite.	Site Manager/ECO
Operation Phase					
Waste separation at source	Reduce the volume of waste to the landfill site by early provision of opportunities reuse and recycling	<ul style="list-style-type: none"> ○ Provision of different waste separation containers for public spaces. ○ Initiate a public awareness program on waste separation for schools and the public. ○ Identify an environmental youth group and support in addressing environmental topics including problems of waste. 	Continuous	Availability of waste separation containers/drums in public areas and public institutions such as schools.	ECO

		<ul style="list-style-type: none"> ○ Initiate demonstration projects at council premises on waste separation practices. ○ Engage businesses with large premises for placement of waste separation demonstration containers. ○ Place notices of penalties for illegal dumping or littering in hotspot areas. ○ Identify area for placement of skip containers for domestic rubble and garden waste. ○ Acquire skip containers for waste separation. 			
Differentiated loading of waste at source by contractors	Reduce the quantities of waste landfilled through improved handling and treatment.	<ul style="list-style-type: none"> ○ Induction of contractors on procedures required for waste handling at loading points. ○ Monitor contractors regularly to comply with measures initiated to separate waste at source. ○ Dedicate a contractor towards rubble and garden waste collection with appropriate trucks. ○ Reuse of clean rubble waste as fill material for some depressed surfaces or roads. ○ Contracts of waste contractors to induce clauses on required waste handling practices. 	Annual induction of employees and every new recruit Weekly inspection of contractor loading practices	Induction records (list of attendees, date of induction, signatures and contact details) Inspection reports	ECO Contractors

Securing of waste with nets during transportation	Prevent littering of the landscape	<ul style="list-style-type: none"> ○ Maintain current practices of all waste trucks to have mesh/nets or cage to secure all waste when transported from town to landfill site. ○ Inspect waste trucks for securing of waste when transported to site. 	<p>Continuous securing of loaded waste</p> <p>Weekly inspection of contractor trucks</p>	Inspection reports	ECO Contractors
Waste offloaded in appropriate demarcated areas	Site utilization in accordance to approved plan.	<ul style="list-style-type: none"> ○ Place signage of the various areas for offloading different type of waste. ○ Waste contractors should be inducted on site utilization layout ○ Weekly inspection of the site to ensure compliance. 	Weekly site visits	All waste in marked areas accordingly	ECO
Recyclable materials removed from general cell	Reduce quantities of waste for landfilling.	<ul style="list-style-type: none"> ○ Initiate waste picking and sorting activity at the landfill site. ○ Acquire waste pickers and sorters of recyclables and reusable materials and package them. ○ Engage local waste recyclers to explore possibilities and interests in waste collected and packaged at site. 	Continuous	Picking and sorting of waste onsite	PR/ECO/Site Workers

Health and safety of workers	Preservation of the safety and health of the workers	<ul style="list-style-type: none"> ○ Provision of Personal Protective Equipment (PPE) such as safety shoes, gloves, eye wear and overalls to all employees; ○ Conduct first aid and safety awareness training for contractors ○ Schedule inspections and audit of the practices of the contractors for compliance. 	Continually Every 2 years	First aid training records PPE	Contractors
Onsite waste weighing and subsequent offloading.	Provide data for process improvements	<ul style="list-style-type: none"> ○ Construct platform at the gate for weighbridge ○ Acquire mobile weighbridge unit for installation at the site. ○ Assign responsibility of weighing and recording information associated with waste vehicles to the site. ○ All waste carrying vehicles pass through the weighbridge for weighing. ○ Regular auditing of the records for compliance to required record system. 	Continually weigh incoming waste vehicles	Site records	Site Manager/ECO
Opportunities for locals in picking and sorting of waste	Ensure site utilization activities benefits local communities	<ul style="list-style-type: none"> ○ Priority be given to locals for non-qualifying job opportunities in waste picking and sorting of recyclables. ○ Where qualifying positions are available, locals be given advantage. 	Continuous throughout site life span	Liselo locals as part of waste pickers and sorters	PR

Flying litter in surroundings area of the landfill site	The surrounding landscape is free of litter	<ul style="list-style-type: none"> ○ A compactor or other earth moving machine be stationed at site to shift and gather waste offloaded, compact on daily basis to prevent flying into adjacent land. ○ All litter that gathers around the fence should be regularly cleaned through manual removal 	Daily compaction and covering Monthly manual litter removal around the site	Minimal flying litter in the surrounding	Site Manager
Increase in vermin, flies and pests in the surrounding area	Reduce vermin numbers to site and adjacent landscape	<ul style="list-style-type: none"> ○ Adequate daily covering of landfilled waste on general waste cell. 	Daily compaction and covering of general waste cell	Compacting machine onsite	PR/Site Manager
Luring of scavengers to the site to collect food and other reusable and recyclables	Avoid social disturbance to the local community	<ul style="list-style-type: none"> ○ Access to the site be controlled by lockable gate. ○ Place 24-hour security personnel to control access and record all authorized entries to the site. ○ Job opportunities reserved for locals to limit immigration into the area 	<ul style="list-style-type: none"> ○ Continuous access control 	Control gate to site	Site Manager
Luring aggressive wild animals to the site	Minimise the presence of wild animals into the area	<ul style="list-style-type: none"> ○ Daily compacting and covering of the general waste cell. ○ Regular sighting (observation) and recording of wild animals in the area ○ Conduct nearby community visits to determine eminent concerns that may arise 	Daily compaction and covering.	Records of any animal sightings	Site Manager ECO

		and device measures to address where possible.			
Leachate generation to subsurface environment	Preserve baseline conditions of the groundwater resources of the area	<ul style="list-style-type: none"> o Ensure construction of base layering of general waste cells as per design requirements. o Drilling of boreholes up and down gradient of the site. o Quarterly borehole water quality sampling and testing o Inclusion of identified private water points for water quality sampling and testing. o Analysis of results and interpretation of any deviation from baseline conditions. o Regular reporting to the regulatory authority of the results of the monitoring system. 	Once off during construction Quarterly groundwater monitoring programme and reporting	Quarterly reports Monitoring programme	ECO
Generation of Odour	Limits the spread the odour	<ul style="list-style-type: none"> o Daily compacting and adequate covering with sand/clay material 	Daily compacting and covering	Site observations	Contractor
Accidental spillage of oils or fuels infiltrating to groundwater		<ul style="list-style-type: none"> o Use drip trays when refuelling of earth moving vehicles onsite o Daily inspection of vehicles for signs of leakages and or spills and keep record 	Daily machine inspections.	Drip trays available onsite Record of daily inspections	Contractor
Generation of smoke into surrounding area	Minimise the spread of smoke to adjacent landscape	<ul style="list-style-type: none"> o No open burning of waste to be allowed prior acquiring an incineration unit 	Weekly site inspections	Incineration schedule.	Site Manager

		<ul style="list-style-type: none"> ○ Schedule incineration for few days (2-3) a week spaced with up to 2 days in-between to avoid continuous smoke retention in the atmosphere. ○ Incineration of waste to be monitored frequently by the health/environmental officer ○ Limit incineration on windy days and months of the year 		No signs of open burning on waste cells	
Landfilling as per operation design recommended	Maintain the approved approach to landfilling	<ul style="list-style-type: none"> ○ The landfilling process to align with the cell recommended approach. ○ Regular Inspection of the landfilling approach. 	Daily landfilling Weekly inspections	Site observations	Site Manager/ECO
Opportunities in guarding of site	Local benefit form site utilization	<ul style="list-style-type: none"> ○ Priority be given to locals for non-qualifying job opportunities in waste picking and recycling ○ Where qualifying positions are available, locals be given advantage 	Lifespan of site utilization	Site guarding contacted to locals of the area	PR
Potential pollution of groundwater from wastewater generated	Preservation of groundwater resources from pollution	<ul style="list-style-type: none"> ○ Weekly monitoring of the septic tank levels ○ Pumping of septic effluent and transportation to the town's wastewater facilities for proper handling and treatment. 	Weekly monitoring of septic tanks Monthly review of the operations	Records of pumping and transportation	Site Manager/ECO

Town residents visitors do not interfere and or disrupt site operations.	All visitors align to required site requirements	<ul style="list-style-type: none"> ○ No town residents to be allowed access site to dispose waste until prior approval is provided. ○ No commercial agencies allowed to dispose waste at site without making prior arrangement and agreement with site proponent. ○ All waste coming into the facility should be weighed and guided to appropriate area. ○ Avail drop-off waste skips at the gate area for residents and nearby communities. ○ Keep a register of waste brought to site 	Continuous	Records of visitors to site	Site Manager
Decommissioning Phase					
Stakeholder engagement on land end land use	Common understating is reached on potential end land uses	<ul style="list-style-type: none"> ○ Maintain and update the list of stakeholders established for engagement on end land use ○ Device a stakeholder engagement plan ○ Implement stakeholder engagement plan on end land uses. 	Continuous	Stakeholder engagement plan Updated list of stakeholders	PR/ECO
Safety and Health of workers	Employees health and safety is uncompromised	<ul style="list-style-type: none"> ○ Provide PPE to the workers ○ Induction on safe working practices 	Throughout the phase	All employees with PPE onsite	Site Manager
Potential pollution of groundwater from wastewater generated	Preservation of groundwater resources from pollution	<ul style="list-style-type: none"> ○ Weekly monitoring of the septic tank levels ○ Pumping of septic effluent and transportation to the town's wastewater facilities for proper handling and treatment. 	Weekly monitoring of septic tanks	Records of pumping and transportation	Site Manager/ECO

			Monthly review of the operations		
No access to site until end use is approved by all stakeholders.	site disturbance is minimized post utilization	<ul style="list-style-type: none"> ○ Secure all access routes into the site. ○ Monthly inspection the site for breached access and rectification of any breaches 	Continuous	Lockable gate Maintained fence	PR/ECO
Site closure and after care	Detect any risks of groundwater resources pollution	<ul style="list-style-type: none"> ○ Groundwater sampling and monitoring to continue post closure of the site. ○ Analysis of results and interpretation of any deviation from baseline conditions. ○ Regular reporting to authorities 	Continuous to site relinquishment	Sampling and testing results	PR/ECO

6. Compliance to EMP

An EMP is a legally binding document under the requirements of the Environmental Management Act (No. 7 of 2007) and as such this document must be read as a living document and that its requirements implemented and regularly updated with changing project activities.

6.1 Protocol for Managing Incidents

As a legally binding document, incidents involving deviation shall invoke the following process;

1. Immediate reporting of the incident to the site supervisor and record of incident be kept.
2. Correction measures immediately implemented to cause a halt and safeguard the environment or health and safety of the people onsite and surroundings.
3. The ECO to conduct an investigation of the incident and recommend further action to ensure the incidents does not recur.

6.2 Measures for Non-Compliance

Incidents results from negligence shall incur disciplinary actions which may include option such as;

- financial penalties,
- legal action
- fines and/or suspension of work or contract.

The disciplinary action shall be determined according to the nature of the non-compliance or crime, and exact penalties to the discretion of the EM and ECO in compliance to the requirements of the ECC.

7. EMP Monitoring and Review

This Environmental Management Plan must be used as an on-site reference document during all phases of the site development and operation. Auditing must take place every quarter in order to monitor compliance with the EMP. The compiled quarterly reports will make up the bi-annual reports required by the MEFT-DEA on the operations of the landfill over the entire validity of authorization afforded.

8. Conclusions and Recommendations

Implementation of the EMP is critical to ensuring the implementation of the envisaged activities. The devised measures to safeguard public health and safety and environment are considered adequate in mitigating adverse effects from any of the envisaged activities. These measures have been taken from contemporary practices in waste management across sectors but are also are measureable, cost effective and practicable.

It is upon this that with full commitment of the Proponent to implementation of the measures included in this document, it is recommended by the Environmental Assessment Practitioner that the project is issued clearance to proceed with envisaged activities. The Proponent is liable to the regulatory Authority for the full implementation of measures and controls contained.