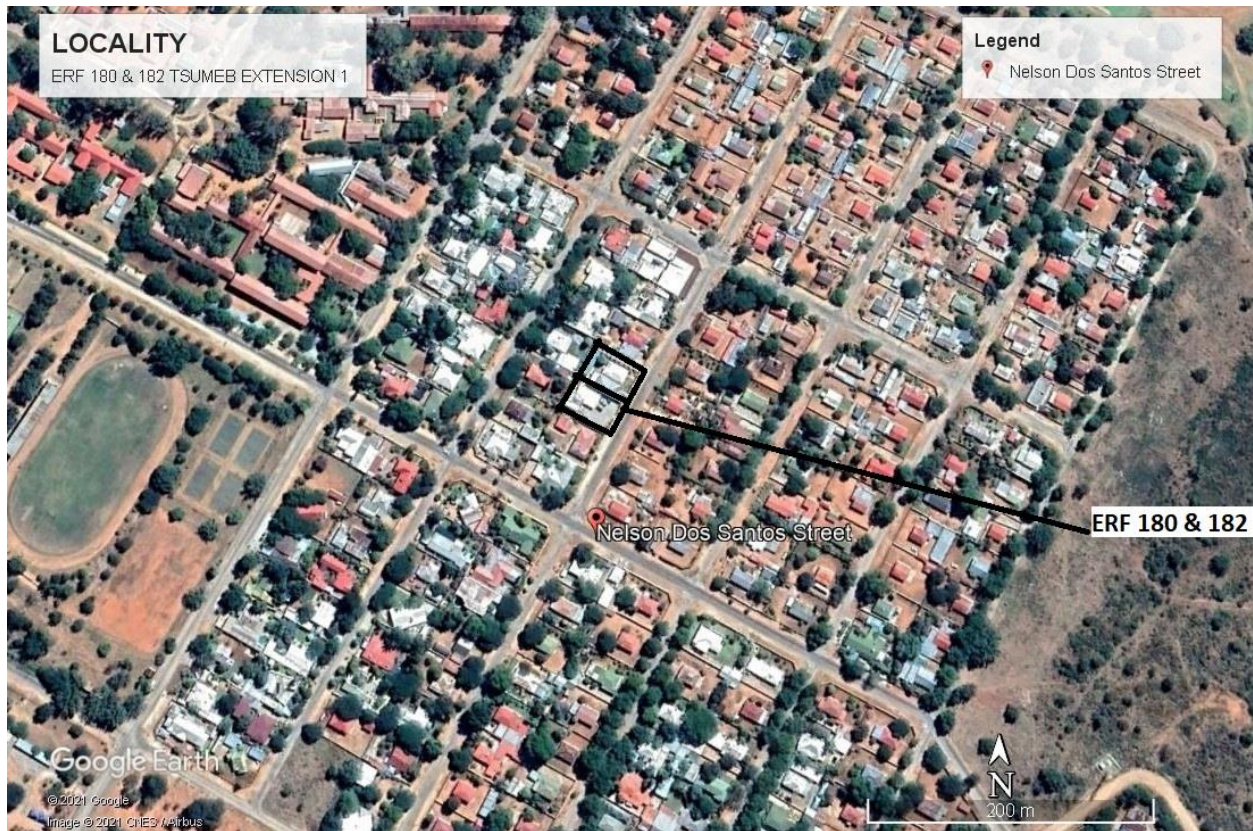


# ENVIRONMENTAL MANAGEMENT PLAN

FOR THE CONSOLIDATION AND REZONING OF ERVEN 180 AND 182, TSUMEB FROM “RESIDENTIAL 1” TO “BUSINESS 1” FOR THE FORMALIZATION OF THE EXISTING TSUMEB GUEST HOUSE KAMHO IN TSUMEB TOWN, OSHIKOTO REGION, NAMIBIA.



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**LIST OF ABBREVIATIONS**

| TERM | DEFINITION                    |
|------|-------------------------------|
| ECO  | Environmental Control Officer |
| RoD. | Record of Decision            |
| EO   | Environmental Officer         |
| RE   | Resident Engineer             |
| ELO  | Environmental Liaison Officer |
| PPE  | Personal Protective Equipment |
| EMP  | Environmental Management Plan |

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## INTRODUCTION AND BACKGROUND

Tsumeb Guest House Kamho has proposed the consolidation and rezoning of Erven 180 and 182, Tsumeb from “Residential 1” to “Business 1”, for the formalization of an already existing Guest House. The consolidation and rezoning are required in order to formalize the already constructed guest house which will be part of a broader business development in the surrounding area.

Nghivelwa Planning Consultants have been appointed to conduct an Environmental Management Plan (EMP) for the consolidation and rezoning of Erf 180 and 182, Tsumeb from “Residential 1” to “Business 1” for the formalization an existing Guest House.

The purpose of the EMP report is to proactively address potential problems before they occur. This will ensure that unnecessary damage to the environment during the operational phase is avoided. Moreover, mitigation measures will be implemented to minimize environmental degradation.

## PROJECT DESCRIPTION

The proposed development is for the consolidation and rezoning of Erven 180 and 182, Tsumeb from “Residential 1” to “Business 1” for the formalization of an existing Tsumeb Guest House Kamho in Tsumeb Town, Oshikoto Region in northern Namibia.

The project involves the formalization of existing buildings and Municipal infrastructure of Water, Sewerage and Electricity to cater for the already constructed Guest House. The proponent will be responsible for the maintenance of the site during operational phase such as Waste management from site, noise pollution control, safety as well as the maintenance of the afore-mentioned services.

## SCOPE

The framework within which this Environmental Management Plan Report (EMP) is developed includes identifying various activities, their occurrence in the construction process and the likely impacts that are associated with those activities. It is therefore necessary to subcategorize the EMP report into Pre-Construction, Construction and Post-Construction activities.

The first category of the EMP report deals with the pre-construction activities identifies the impacts and mitigation measures that will need to be employed before the construction of the proposed project begins.

The second category deals with the construction activities and the mitigation measures that will need to be applied to reduce the severity of the impacts the proposed development may have on the surrounding environment.

The third category discusses the analysis measures that will need to be implemented once the construction is completed, to ensure that the impact of the proposed rehabilitation on the environment is minimized. Furthermore, it will discuss activities that need to be undertaken to ensure that no environmental degradation occurs as a result of the project.

This project is a formalization of an already existing Guest House; no new construction of buildings will take place. Thus this EMP will only discuss the third category that will analyse the measures to be taken after the construction.

This environmental management plan (EMP) aims to take a pro-active route by addressing potential problems before they occur. This should limit the corrective measures needed, although additional mitigating measures might be included if necessary.

## POLICY AND OTHER RELEVANT LEGISLATIONS

The following are the legal instruments that govern or advocate the establishment of Guest Houses and the consolidation and rezoning of Erven 180 & 182, Tsumeb from “Residential 1” to “Business 1”:

|  | <b>Instruments and Content</b>  | <b>Application to the project</b>  |
|--|---|--|
| <b>The Constitution of the Republic of Namibia</b>     | <i>General human rights – eliminates discrimination of any kind<br/>The right to a safe and healthy environment<br/>Affords protection to biodiversity</i>                          | <i>Ensure these principles are protected<br/>in the documentation of the exploration project</i> |
| <b>Environmental Management Act EMA (No 7 of 2007)</b> | <i>Requires that projects with significant environmental impact are subject to an environmental assessment process (Section 27). Details principles which are to guide all EAs.</i> |  |

|  |   |  |
|--|---|--|
| <b>Forestry Act No 27 of 2004</b>                                      | <i>Provision for the protection of various plant species</i>  | <i>Some species that occur in the area are protected under the Forestry Act and a permit is therefore required to remove the species</i>   |
| <b>Hazardous Substances Ordinance 14 of 1974:</b>                      | <i>Control of substances which may cause injury or ill-health or death of human beings because their toxic, corrosive, irritant, strongly sensitizing or flammable nature</i>                             | <i>The waste generated on site and at the campsite should be suitably categorised/classified and disposed of properly and in accordance with the measures outlined in the Ordinance and Bill</i> |
| <b>The Nature Conservation Ordinance ( No. 4 of 1975)</b>              | <i>Prohibits disturbance or destruction of protected birds without a permit. Requires a permit for picking (the definition of "picking" includes damage or destroy) protected plants without a permit</i> | <i>Protected plants will have to be identified during the planning phase of the project. In case there is an intention to remove protected species, then permits will be required</i>            |
| <b>Forestry Act 12 of 2001 Nature Conservation Ordinance 4 of 1975</b> | <i>Prohibits the removal of any vegetation within 100 m from a watercourse (Forestry Act S22(1)). Prohibits the removal of and transport of various protected plant species.</i>                          | <i>Even though the Directorate of Forestry has no jurisdiction within townlands, these provisions will be used as a guideline for conservation of vegetation.</i>                                |
| <b>Convention on Biological Diversity, 1992</b>                        | <i>Protection of biodiversity of Namibia</i>  | <i>Conservation-worthy species not to be removed if not absolutely necessary.</i>  |
| <b>Water Act 54 of 1956 Water Resources Management Act 24 of 2004</b>  | <i>The Water Resources Management Act 24 is presently without regulations; therefore the Water Act 54 is still in force The Act provides for the management and protection of surface and</i>             | <i>Obligation not to pollute surface water bodies</i>  |

|   |   |   |
|---|---|---|
|   | <i>groundwater resources in terms of utilisation and pollution</i>  |   |
| <b>National Heritage Act 27 of 2004</b>                   | <i>Section 48(1) states that “A person may apply to the [National Heritage] Council [NHC] for a permit to carry out works or activities in relation to a protected place or protected object</i>  | <i>Any heritage resources (e.g. human remains etc.) discovered during construction requires a permit from the National Heritage Council for relocation</i>  |
| <b>Labour Act 11 of 2007</b>                              | <i>Details requirements regarding minimum wage and working conditions (S39-47).</i>   | <i>Employment and work relations</i>  |
| <b>Health and Safety Regulations GN 156/1997 (GG 1617</b> | <i>Details various requirements regarding health and safety of labourers.</i>   | <i>Protection of human health, avoid township establishment at areas that can impact on human health.</i>   |
| <b>Public Health Act 36 of 1919</b>                       | <i>Section 119 states that “no person shall cause a nuisance or shall suffer to exist on any land or premises owned or occupied by him or of which he is in charge any nuisance or other condition liable to be injurious or dangerous to health.”</i>  | <i>Tsumeb Guest House Kamho should ensure that all contractors involved during the construction, operation and maintenance of the proposed project comply with the provisions of these legal instrument</i>                         |
| <b>Water Act 54 of 1956</b>                               | <i>The Water Resources Management Act 24 of 2004 is presently without regulations; therefore the Water Act No 54 of 1956 is still in force:<br/>Prohibits the pollution of underground and surface water bodies (S23(1)).<br/>Liability of clean-up costs after closure/ abandonment of an activity (S23(2)).</i> | <i>The protection of ground and surface water resources should be a priority. The main threats will most likely be concrete and hydrocarbon spills during construction and hydrocarbon spills during operation and maintenance.</i> |

## PROJECT LOCALITY

The site is located on 11<sup>th</sup> Road, Nelson Dos Santos Street Tsumeb, Oshikoto Region, Namibia. Coordinates; latitude 19°15'8.12"S and Longitude 17°43'6.52"E.



## MANAGEMENT PRINCIPLES

These guideline principles will form the basis for environmental management on site. Should these principles require modification or additions during the project this should be done at the discretion of the responsible person, who will ensure that any modifications are communicated, explained to and discussed with all affected parties (i.e. Tsumeb Guest House Kamho, Nghivelwa Planning Consultants, the contractors, and any affected party who requests this information).

The environmental operational procedures and environmental issues are identified and managed, under different phases of the project. The different phases are:

- Operational Phase; and
- Decommissioning Phase



## Environmental Issues to be managed

### Operational Phase

Unless otherwise indicated, the responsibilities of the maintenance contractor(s) will adhere to specified EMP actions for the operational phase. Tsumeb Guest House Kamho must give a copy of the EMP to all contractors and sub-contractors before commencement of any work on the site to ensure accountability and responsibility are implemented between different role players. Hence, all appointed contractors must ensure that they comply with the EMP and its conditions at all times.

### Consultation with Interested and Affected parties (IAPs)

During the Operational Phase, it is of great value to establish an open communication channel between the management (Tsumeb Guest House Kamho) and IAPs such that any queries, complaints or suggestions can be dealt with quickly and by the appropriate person(s).

## ROLES AND RESPONSIBILITIES

This section describes the roles and responsibilities of the key stakeholders involved in the development, implementation and review of the EMP.

### Competent Authority

The Department of Environmental Affairs: Ministry of Environment and Tourism is responsible for the review of the EMP documents it is the competent authority.

### Tsumeb Guest House Kamho (Applicant)

The role of the applicant is as follows:

Tsumeb Guest House Kamho as the applicant, should hire suitably qualified person(s) and assign them with the responsibility to ensure implementation of the EMP, and should:

- Revise the EMP as required and inform the relevant parties of the changes.
- The applicant should review report regarding the implementation of the EMP and make payments to the Contractor if the EMP is being implemented in a satisfactory manner.
- Give warnings and impose fines and penalties on the Contractor if the Contractor neglects to implement the EMP satisfactorily.
- Protect the environment and rehabilitate the environment.

## Tsumeb Guest House Kamho (Project Manager)

The Applicant will appoint the Project Manager. The role of the project manager will be:

- Liaising directly with the relevant authorities with respect to the preparation and implementation of the EMP and meeting the conditions documented in the environmental clearance certificate.
- Bear the overall responsibility for managing the project contractors and ensuring that the environmental management requirements are met.
- Inform the contractors of the EMP and Environmental clearance certificate obligations.
- Approve all decisions regarding environmental procedures and protocols that must be followed.
- Have the authority to stop any construction in breaking with the EMP and Record of Division (RoD).
- In consultation with the Environmental/ Safety Officer (EO) has the authority to issue fines for contravention of basic conduct rules and/or contravention of the EMP.
- Maintain open and direct lines of communication between the proponent, Contractor and Interested and Affected Parties (I&APs) with regards to environmental matters.
- Attend regular site meetings and inspections where required.

## Contractor's Safety Officer

- Ensure that safety is practiced for all activities on site.
- Prepare and implement safety procedures
- Communicate all safety related issues.

## Contractors

The contractor should appoint the Contractor's representative who is suitably qualified to implement the EMP. The responsibilities of the Contractor include:

- Compliance with the relevant legislation and the EMP.
- Preparation and submission to the proponent through Project Manager the following Management Plans prior to commencing work:
  - Emergency Preparedness and Response;
  - Waste Management; and
  - Health and Safety.
- Environmental awareness presentations (inductions) to be given to all site personnel prior to work commencement;
- Record keeping of all environmental awareness training and induction presentations; and
- Attend regular site meetings and environmental inspections

## Resident Engineer (RE)

The Resident Engineer (RE) will be appointed by the 'Consultant' and will be required to oversee the construction program and construction activities performed by the Contractor. The RE is expected to communicate with

## PHASES OF THE PROJECT

### The Operational Phase

By taking pro-active measures during the planning and construction phases, potential environmental impacts emanating during the operational phase will be minimised. This, in turn, will minimise the risk and reduce the monitoring effort, but it does not make monitoring obsolete.

| Impacts                                   | Description   | Mitigation   | Monitoring   | Responsible Body                               |
|---|---|--|--|--|
| <b>Increased employment opportunities</b> | Equity, transparency, should be put into account when hiring and recruiting and that committees should also take part in the recruiting process for decision makings. | <p>The principles of gender equality, maximizing local employment should be implemented in the provision and establishment of jobs.</p> <p>Jobs for the maintenance of infrastructure and services will be created following the completion of the development. These jobs might be made available to existing labour there creating long term employment.</p> <p>All qualified professionals hired to work for the development should be Namibians.</p> | Monitored once off by the Project Manager/Tsumeb Guest House Kamho | Appointed Contractor/ Tsumeb Guest House Kamho |

|  |  |  |  |                                     |
|--|--|--|--|-------------------------------------|
|  |  | Other Labor or services (e.g. security guards) should be sourced from the local supplies or Security Companies within Tsumeb area.   |  |                                     |
| <b>Improved aesthetic look of the area</b> | The development of this project at this site is essential to improve the visual and aesthetics view of the area.         | <p>The developer should create awareness among the staff working in the proposed offices about energy conservation, waste management, saving of water and other resources.</p> <p>It should provide accessibility to the services provided in the building.</p> <p>Parking areas will be provided.</p> <p>Ensure proper and regular maintenance of the area.</p> <p>No illegal dumping of waste should be allowed and the site must be clear of litter at all times.</p> | Regular visual inspection by Project Manager | Tsumeb Guest House Kamho / Tsumeb M |
| <b>Water demand</b>                        | Namibia is a water scarcity country, therefore, the additional development like this one will increase the water demand. | This development will create employment to people from different backgrounds and with different perceptions on using water. Therefore, awareness should be created to inform people on the   | Monitored once off by the EO                 | Tsumeb Guest House Kamho            |

|                         |  |   |                              |  |
|-------------------------|--|---|------------------------------|--|
|                         |  | importance of saving water to reduce water consumption.   |                              |  |
| <b>Power usage</b>      | Namibia is experiencing power shortage, therefore electricity should be used wisely in order to sustain the future generation. | Power should be off in areas that are not in use/avoid unnecessary lights:<br><br>Avoid unnecessary printings<br><br>Unplug unused electronics<br><br>Ditch the desktop computers<br><br>Encourage use of renewable energy i.e. Solar lights at parking and solar gysers to supplement the electricity supply   | Monitored once off by the EO | Tsumeb Guest House Kamho                       |
| <b>Waste management</b> | Generation of domestic waste while sewage waste will be generated from toilets   | During the operations phase, the Tsumeb Municipality waste management will manage the waste disposal from the site while the Tsumeb Guest House Kamho will ensure that waste are stored in correct waste storages.<br><br>Tsumeb Municipality to develop a formal waste collection strategy and that the waste is to be collected regularly by disposed of at | Regular inspection By EO     | Tsumeb Guest House Kamho / Tsumeb Municipality |

|  |  |   |  |  |
|--|--|---|--|--|
|  |  | authorized dumping site or disposal site.<br>Ensure maintenance of sewage system<br>Illegal dumping should be prohibited. |  |  |
|--|--|---|--|--|

## ENVIRONMENTAL MONITORING PLAN

Environmental monitoring plan is part of the EMP performance assessment and will need to be compiled and submitted as determined by the Environmental Commissioner. The process of monitoring performances against the objectives and documenting all environmental activities is part of internal and external auditing. This will be coordinated by the Environmental Control Officer (ECO) / External Consultant / Suitable qualified in-house resource person. Tables 3 outline the type of information that shall need to be recorded on a regular basis by the Environmental Control Officer (ECO) as part of the monitoring process of the activities and the effects.

| Mitigation  | Compliance | Follow-up action required | By whom | By When | Completed |
|---|------------|---------------------------|---------|---------|-----------|
| Is there an Environmental awareness training programme?           |            |                           |         |         |           |
| How many people have been given environmental awareness training? |            |                           |         |         |           |
| Is a copy of the EMP on site?                                     |            |                           |         |         |           |
| How effective is the  |            |                           |         |         |           |
| Awareness training?   |            |                           |         |         |           |
| Do people understand the contents of the EMP?                     |            |                           |         |         |           |
| If not, where are the weaknesses?                                 |            |                           |         |         |           |



|   |  |  |  |  |  |
|---|--|--|--|--|--|
| Ask 3 people at random various questions about the EMP. |  |  |  |  |  |
|---|--|--|--|--|--|