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Environmental Management Plan Proposed Construction and Operation of a Renewable Solar Energy Facility and Battery Energy Storage System in the Erongo Region





MBA Management Solutions

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PROJECT DETAILS

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TABLE OF CONTENTS

INTR	ODUCTION	4
ROL	ES AND RESPONSIBILITIES	6
.2	DEVELOPER'S REPRESENTATIVE ENVIRONMENTAL CONTROL OFFICER CONTRACTOR	7
MAN	AGEMENT ACTIONS	10
.2	PLANNING AND DESIGN PHASE CONSTRUCTION PHASE OPERATION AND MAINTENANCE PHASE DECOMMISSIONING PHASE	12 17
	ROLI .1 .2 .3 ASSU APPI MAN .1 .2 .3	.2 ENVIRONMENTAL CONTROL OFFICER

LIST OF TABLES

Table 2-1:	DR's responsibilities	6
	Legal provisions relevant to this development	
Table 5-1:	Planning and design management actions	11
Table 5-2:	Construction phase management actions	13
Table 5-3:	Operation and maintenance management actions	17
Table 5-4:	Decommissioning phase management actions	21

ABBREVIATIONS

AIDS	Acquired Immuno-Deficiency Syndrome
DR	Developer's Representative
EA	Environmental Assessment
ECC	Environmental Clearance Certificate
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
EMA	Environmental Management Act
EMP	Environmental Management Plan
GG	Government Gazette
GIS	Geographic Information System
GN	Government Notice
GPS	Global Positioning System
HIV	Human Immuno-deficiency Virus

I&APs	Interested and Affected Parties
NHC	National Heritage Council
Reg.	Regulation
S	Section
ТВ	Tuberculosis

1 INTRODUCTION

Namibia is regarded as a net exporter of electricity, local electricity generation is derived from hydropower, coal and diesel burning power stations; however, this is not enough to meet local demand necessitating the country to source the balance, amounting to more than 60%, from other countries within the Southern African region such as Zambia, South Africa, Zimbabwe and Mozambique; of which South Africa's contribution is dominant at 53%. Despite the current situation, the energy consumption in Namibia follows an upward trajectory because of the unavoidable dependency of national development on the availability, supply, demand and use of energy. Namibia will thus have to develop, as a matter of urgency, its own capacity to generate electricity.

Renewable energy sources offer numerous advantages over fossil fuels, including lower greenhouse gas emissions, improved air quality, and reduced dependence on finite resources. Solar energy, in particular, has experienced rapid growth due to falling costs and technological advancements in photovoltaic systems.

Despite these benefits, one of the main challenges of renewable energy sources is their intermittency and variability. Solar power generation is dependent on weather conditions, meaning that electricity production may not align with demand. This variability can strain the electricity grid and require backup power from fossil fuel plants, undermining the environmental benefits of renewable energy. Battery energy storage systems have emerged as a solution to this challenge, enabling the storage of excess energy generated during periods of high production for use when demand is high or production is low.

Battery energy storage systems offer several key benefits for the integration of renewable energy into the grid. They help smooth out fluctuations in energy generation, improve grid stability, and enhance the reliability of renewable energy sources. By storing excess energy when production exceeds demand and discharging stored energy when needed, battery storage systems can optimize the use of renewable energy and reduce the need for backup power from fossil fuel plants. This flexibility is essential for maximizing the value of renewable energy sources and accelerating the transition to a clean energy future.

MBA Management Solutions (the proponent) is focused on becoming a major player in the green renewable energy generation, production and trading space. They intend to generate renewable energy from solar incorporating battery energy storage systems, in the Trekkopje area of the Erongo Region to be known as #Gaingu Green Energy Industrial Park. The electricity generated will be fed to the national grid for consumption by industrial loads and export to the neighbouring countries. The proponent appointed Environam Consultants Trading cc (ECT) to undertake the Environmental Assessment (EA) in order to obtain an Environmental Clearance Certificate (ECC) for the activity from the Office of the Environmental Commissioner in the Ministry of Environment, Forestry and Tourism (MEFT).

The process will be undertaken in terms of the gazetted Namibian Government Notice No. 30 Environmental Impact Assessment Regulations (herein referred to as EIA Regulations) of the Environmental Management Act (No 7 of 2007) (herein referred to as the EMA). The EIA process will investigate if there are any potential significant bio-physical and socio-economic impacts associated with the proposed development and related infrastructure and services.

The EIA process will also provide an opportunity for the public and key stakeholders to provide comments and participate in the process. It will also serve the purpose of informing the proponent's decision-making, and that of MEFT.

An EMP is one of the most important outputs of the EIA process, as it synthesises all of the proposed mitigation and monitoring actions, set to a timeline and with specific assigned responsibilities. This EMP details the mitigation and monitoring actions to be implemented during the following phases of this development:

- <u>Planning and Design</u> the period, prior to construction, during which preliminary legislative and administrative arrangements, necessary for the preparation of the land, are made and engineering designs are carried out. The preparation of construction tender documents forms part of this phase;
- <u>Construction</u> the period during which the proponent, having dealt with the necessary legislative and administrative arrangements, appoints a contractor for the construction of services infrastructure, buildings as well as any other construction process(s) within the development areas;
- <u>Operation and Maintenance</u> the period during which the development will be fully functional, operational and maintained.

The decommissioning of this development is not envisaged; however, in the event that this should be considered some recommendations have been outlined in Table 5-4.

2 ROLES AND RESPONSIBILITIES

MBA Management Solutions (the Developer) is ultimately responsible for the implementation of the EMP, from the planning and design phase to the decommissioning phase of this development, if the development is in future decommissioned. The developer will delegate this responsibility as the project progresses through its life cycle. The delegated responsibility for the effective implementation of this EMP will rest on the following key individuals:

- Developer's Representative;
- Environmental Control Officer; and
- Contractor (Construction and Operations and Maintenance).

2.1 DEVELOPER'S REPRESENTATIVE

The Developer should assign the responsibility of managing all aspects of this development for all development phases (including all contracts for work outsourced) to a designated member of staff, referred to in this EMP as the Developer's Representative (DR). The Developer may decide to assign this role to one person for the full duration of the development, or may assign a different DR to each of the development phases - i.e. one for the planning and design phase, one for the construction phase and one for the operation and maintenance phase. The DR's responsibilities are depicted in

 Table 2-1 as follows:

Responsibility	Project Phase
Making sure that the necessary approvals and permissions laid out in Table 4-1 are obtained/adhered to	Throughout the lifecycle of this development
Making sure that the relevant provisions detailed in Table 5-1 are addressed during planning and design phase.	Planning and design phase
Suspending/evicting individuals and/or equipment not complying with the EMP	ConstructionOperation and maintenance
Issuing fines for contravening EMP provisions	ConstructionOperation and maintenance

Table 2-1: DR's responsibilities

2.2 ENVIRONMENTAL CONTROL OFFICER

The DR should assign the responsibility of overseeing the implementation of the whole EMP on the ground during the construction and operation and maintenance phases to a designated member of staff, referred to in this EMP as the Environmental Control Officer (ECO). The DR/Developer may decide to assign this role to one person for both phases, or may assign a different ECO for each phase. During the operation phase the Developer may outsource the monitoring and evaluation of the EMP to an independent Environmental Consultant. The ECO will have the following responsibilities during the construction and operation and maintenance phases of these developments:

- Management and facilitation of communication between the Developer, DR, the contractors, and Interested and Affected Parties (I&APs) with regard to this EMP;
- Conducting site inspections (recommended minimum frequency is monthly) of all construction and/or infrastructure maintenance areas with respect to the implementation of this EMP (monitor and audit the implementation of the EMP);
- Assisting the Contractor in finding solutions with respect to matters pertaining to the implementation of this EMP;
- Advising the DR on the removal of person(s) and/or equipment not complying with the provisions of this EMP;
- Making recommendations to the DR with respect to the issuing of fines for contraventions of the EMP; and
- Undertaking an annual review of the EMP and recommending additions and/or changes to this document.

2.3 CONTRACTOR

Contractors appointed by the Developer are automatically responsible for implementing all provisions contained within the relevant chapters of this EMP. Contractors will be responsible for the implementation of this EMP applicable to any work outsourced to subcontractors. Table 5-2 applies to contractors appointed during the construction phase and Table 5-3 to those appointed during the operation and maintenance phase. In order to ensure effective environmental management, the aforementioned chapters should be included in the applicable contracts for outsourced construction, operation and maintenance work.

The tables in Chapter 5 detail the management measures associated with the roles and responsibilities that have been laid out in this chapter.

3 ASSUMPTIONS AND LIMITATIONS

This EMP has been drafted based on the scoping-level Environmental Assessment (EA) conducted for the proposed development as represented by the developer. ECT will not be held responsible for the potential consequences that may result from any alterations to the initial layout. It is assumed that construction labourers will be sourced mostly from the project area and region at large and that migrant labourers (if applicable) will be housed within the area.

4 APPLICABLE LEGISLATION

Legal provisions that have relevance to various aspects of this development are listed in Table 4-1 below. The legal instrument and applicable corresponding provisions are provided.

LEGISLATION/POLICIES	RELEVANT PROVISIONS	RELEVANCE TO PROJECT
The Constitution of the Republic of Namibia as Amended	Article 91 (c) provides for duty to guard against "the degradation and destruction of ecosystems and failure to protect the beauty and character of Namibia." Article 95(l) deals with the "maintenance of ecosystems, essential ecological processes and biological diversity" and sustainable use of the country's natural	Sustainable development should be at the forefront of this development.
Environmental Management Act No. 7 of 2007 (EMA)	resources. Section 2 outlines the objective of the Act and the means to achieve that. Section 3 details the principle of Environmental Management	informed by the EMA.
EIA Regulations GN 28, 29, and 30 of EMA (2012)	GN 29 Identifies and lists certain activities that cannot be undertaken without an environmental clearance certificate. GN 30 provides the regulations governing the environmental assessment (EA) process.	Activity 1 (a) The generation of electricity. Activity 1 (b) The transmission and supply of electricity.
Convention on Biological Diversity (1992)	Article 1 lists the conservation of biological diversity amongst the objectives of the convention.	The project should consider the impact it will have on the biodiversity of the area.
Draft Procedures and Guidelines for conducting EIAs and compiling EMPs (2008)	Part 1, Stage 8 of the guidelines states that if a proposal is likely to affect people, certain guidelines should be considered by the proponent in the scoping process.	The EA process should incorporate the aspects outlined in the guidelines.
Namibia Vision 2030	Vision 2030 states that the solitude, silence and natural beauty that many areas in Namibia provide are	Care should be taken that the development does not lead to the degradation of the natural beauty of

Table 4-1: Legal provisions relevant to this development

Environmental Management Plan - #Gaingu Green Energy Solar Plant, Erongo Region

LEGISLATION/POLICIES	RELEVANT PROVISIONS	RELEVANCE TO PROJECT
	becoming sought after commodities and must be regarded as valuable natural assets.	the area.
Water Resources Management Act 11 of 2013	Section 68 (1): Prohibits pollution of water resources. Section 68 (2): Prevents the pollution of Water resources.	The pollution of water resources should be avoided during the operation of the development.
The Ministry of Environment, Forestry and Tourism (MEFT) Policy on HIV & AIDS	MEFT has developed a policy on HIV and AIDS. In addition, it has also initiated a programme aimed at mainstreaming HIV and gender issues into environmental impact assessments.	The proponent and its contractor/s have to adhere to the guidelines provided to manage the aspects of HIV/AIDS. Experience with construction projects has shown that a significant risk is created when construction workers interact with local communities.
Urban and Regional Planning Act (Act of 2018).	Urban and Regional Planning Act (Act of 2018) regulates subdivisions of portions of land falling within a proclaimed Local Authority area.	Section 16 of Chapter 3 deals with the Ministers' declaration of authorised planning authorities and establishment of joint committees.
Local Authorities Act No. 23 of 1992	The Local Authorities Act prescribes the manner in which a town or municipality should be managed by the Town or Municipal Council.	The development has to comply with the provisions of the Local Authorities Act.
Labour Act no 11 of 2007	Chapter 2 details the fundamental rights and protections. Chapter 3 deals with the basic conditions of employment.	Given the employment opportunities presented by the development, compliance with the labour law is essential.
Public Health Act no 36 of 1919	Section 119 prohibits persons from causing nuisance.	The developer and contractors are to comply with these legal requirements.
NatureConservationOrdinance no 4 of 1975	Chapter 6 provides for legislation regarding the protection of indigenous plants	Indigenous and protected plants have to be managed within the legal confines.
AtmosphericPollutionPreventionOrdinance (No.11 of 1976).	The Ordinance objective is to provide for the prevention of the pollution of the atmosphere, and for matters incidental thereto.	All activities on the site will have to take due consideration of the provisions of this legislation.
Roads Ordinance 17 of 1972	This Ordinance consolidates the laws relating to roads.	The provisions of this legislation have to be taken into consideration in as far as access to the development site is concerned.
Roads Authority Act, 1999	Section 16(5) of this Act places a duty on the Roads Authority to ensure a safe road system.	Some functions of the Roads Ordinance 17 of 1972 have been assigned to the Roads Authority.
Electricity Act, 2007 (Act No. 4 of 2007)	The Act provides for the requirements and conditions for obtaining licences for the generation of electricity.	Compliance with this legislation is essential.

5 MANAGEMENT ACTIONS

The aim of the management actions in this chapter of the EMP is to avoid potential impacts where possible. Where impacts cannot be avoided, measures are provided to reduce them.

The following tables provide the management actions recommended to manage the potential impacts rated in the scoping-level EA conducted for this development. These management actions have been organised temporally according to project phase:

- Planning and design phase management actions (Table 5-1);
- Construction phase management actions (Table 5-2);
- Operation and maintenance phase management actions (Table 5-3);
- Decommissioning phase management actions (Table 5-4).

The responsible persons at the Developer's team have assessed these commitments in detail and have committed to the specific management actions, where indicated, in the tables below.

5.1 PLANNING AND DESIGN PHASE

The DR should ensure that the management actions detailed below in **Table 5-1** are adhered to during the period before the construction of the infrastructure starts.

	Table 5-1:	Planning and	d design management actions
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PLANNING AND DESIGN PHASE IMPACTS		
Impact	Mitigation Measures	
Surface and Ground Water	 Appoint professional engineers to develop a detailed storm water management design as part of the infrastructure service provision of the development. The service infrastructure should be designed and constructed by suitably qualified engineering professionals. Develop and implement a preventative maintenance plan for the service infrastructure. No dumping of waste products of any kind in or in close proximity to any water bodies. Ensure that surface water accumulating on-site are channelled and captured through a proper storm water management system to be treated in an appropriate manner before disposal into the environment. Wastewater should not be discharged directly into the environment. 	
Land Use	 Disposal of waste from the development should be properly managed. Do not use herbicides to manage plant growth. Introduce additional vegetation and landscaping to supplement lost vegetation. Clearly fence off the development to prevent unauthorised / unwanted movement of people and animals into the site. 	
Fauna and Flora	 Consult with the regional Forestry authority, to identify protected and important indigenous species. Apply for a tree harvesting permit from the regional Forestry authority, where relevant. The proponent should also consider participating in an "off-set" scheme where trees are planted elsewhere in lieu of those that have been removed and cannot be transplanted. It is recommended that the proponent engages NamPower to allow them to follow the same route for their transmission line as the existing NamPower transmission infrastructure. This will minimize habitat degradation. 	
Service Infrastructure	 Ensure professional design and construction of service infrastructure from qualified and registered engineers. Ensure consultation and compliance with relevant authorities responsible for services, such as the Erongo Regional Council, NamPower and NamWater. 	

PLANNING AND DESIGN PHASE IMPACTS		
Impact	Mitigation Measures	
	 It is recommended that electricity demand for the operations be met with the same technology utilised in generation. 	
	 Designs and building materials should be as such to reduce dependency on artificial heating and cooling in order to limit the overall energy demand. 	
	• Water saving mechanisms should be incorporated within the proposed development's design and plans in order to further reduce water demands.	
	 Re-use of treated waste water should be considered wherever possible to reduce the consumption of potable water. 	
	• Train employees on the importance of water and energy savings.	
	Adhere to water quality guidelines in terms of The Water Resource Management Act.	
	Ensure that provision is made for good sightlines at road junctions or intersections.	
Traffic	• Where feasible, limit the type of vehicles to use the internal roads e.g., heavy trucks.	
Hame	Adhere to the local and national speed limits.	
	Implement traffic control measures where necessary.	

5.2 CONSTRUCTION PHASE

The management actions listed in **Table 5-2** apply during the construction phase. This table may be used as a guide when developing EMPs for other construction activities within this development area.

Table 5-2: Construction phase management actions

CONSTRUCTION PHASE IMPACTS		
Impact	Mitigation Measures	
Fauna and flora	 Limit clearing of vegetation to areas within the footprint of the construction site and reduce the frequency of disturbance. Ensure sustainable vegetation removal (harvesting) from site is conducted, in order to support the natural habitats and ecosystem. This should be guided by amongst others, the Forestry harvesting permit approval for the proposed development. Transplant removed vegetation where possible, or plant new trees in lieu of those that have been removed. No vegetation should be removed outside the designated project site, and no disturbance of areas outside the designated working zones is allowed. Prevent contractors from collecting wood, veld food, etc. during the construction phase 	
Pressure on existing	 Educate workforce on water saving measures. 	
infrastructure	 Ensure all potable water points are metered and regularly read. Ensure that the workforce is provided with temporary toilets during the construction phase. 	
Surface and Ground Water	 It is recommended that construction takes place outside of the rainy season in order to limit flooding on site and to limit the risk of ground and surface water pollution. No dumping of waste products of any kind in or in close proximity to any drainage lines and/or water bodies. Prevent spillages of chemicals and petroleum products (i.e. oils, lubricants, petrol and diesel). Use drip trays or linings sheets when evidence of leaks is observed on vehicles or equipment. All fuelling, storage and chemical handling should be conducted on containment surfaces provided for this purpose. All materials at the construction site should be properly stored. Disposal of waste from the site should be properly managed and removed off-site for final disposal at a suitable waste disposal site. Adequate ablution facilities should be provided for at the construction site, with adequate containment systems for these facilities. 	

CONSTRUCTION PHASE IMPACTS		
Impact	Mitigation Measures	
	 Maintain toilets in a hygienic state and remove waste to a designated waste disposal facility. No major servicing and maintenance of vehicles and equipment should be conducted at the site, unless adequate containment systems are provided for this purpose. Removal of oil from machinery should be conducted on these surfaces. Environmental awareness and remedial response training of operators must be conducted on a regular basis. 	
Health, Safety and Security	 Construction personnel should not overnight at the site, except for security personnel. Ensure that all construction personnel are properly trained depending on the nature of their work. Provide for first aid kit and properly trained personnel to apply first aid when necessary. Enforce the use of appropriate Personal Protective Equipment (PPE) for the right task or duties at all times. A wellness program should be initiated to raise awareness on health issues, especially the impact of sexually transmitted diseases and Covid-19. Provide free condoms in the workplace throughout the construction phase. Facilitate access to Antiretroviral medication for construction personnel. Restrict unauthorized access to the site and implement access control measures. Clearly demarcate the construction site boundaries along with signage of no unauthorized access. Demarcate and barricade any areas which may pose a safety risk (including hazardous substances, deep trenches, excavations etc.) and no-go areas on site. Staff and visitors to the site must be fully aware of all health and safety measures and emergency procedures. The contractor(s) must comply with all applicable occupational health and safety requirements. Sufficient lighting within and around the construction location should be erected, when visibility becomes an 	
Air quality	 issue. All loose material should be kept on site for the shortest possible time. It is recommended that dust suppressants such as water or Dustex be applied to all the construction clearing activities to minimise dust. Construction vehicles to only use designated roads. 	

CONSTRUCTION PHASE IMPACTS					
Impact	Mitigation Measures				
	 Avoid excavation, handling and transport of materials which may generate dust under high wind conditions. During high wind conditions the contractor may make the decision (where necessary) to cease works until the wind has calmed down. Cover any stockpiles with relevant cover material to minimise windblown dust. Ensure construction vehicles are well maintained to prevent excessive emission of smoke. Encourage reduction of engine idling when vehicles and machinery are not in use. 				
Noise	 No amplified music should be allowed on site. Inform neighbouring communities of construction activities to commence and provide for continuous communication between them and contractor. Limit construction times to acceptable daylight hours. Install technology such as silencers on construction machinery. Do not allow the use of horns/hooters as a general communication tool, but use it only where necessary as a safety measure. Provide protective equipment such as ear muffs and ear plugs to workers. 				
Traffic	 Limit and control the number of access points to the site. Ensure that road junctions have good sightlines. Construction vehicles' need to be in a road worthy condition and maintained throughout the construction phase. Construction vehicles and machinery must be tagged with reflective signs or tapes to maximise visibility and avoid accidents Transport the materials in the least number of trips as possible. Adhere to the speed limit. Implement traffic control measures where necessary. Minimise the movement of heavy vehicles during peak time. Construction vehicles should not be allowed to obstruct the road, hence no stopping in the road, wholly or partially, but rather pull off the road or park on the roadside. 				

CONSTRUCTION PHASE IMPACTS					
Impact	Mitigation Measures				
Waste Management	 Sufficient number of waste bins should be placed around the site for the soft refuse. Sufficient number of skip containers for the heavy waste and rubble should be provided for around the site. The waste containers should be able to be closed to prevent birds and other animals from scavenging. The Contractor shall institute a waste control and removal system for the site. Solid waste must be disposed of at an appropriate local waste disposal facility, in consultation with the local authority. Separate hazardous wastes from general waste, clearly marked, and stored in appropriate containers. The protocols associated with handling of such hazardous wastes shall be known by all relevant staff members. Regular inspection and housekeeping procedure monitoring should be maintained at all times. 				
Hazardous Substances	 All chemicals and other hazardous substances must be stored and maintained in accordance with the Hazardous Substances Ordinance (No. 14 of 1974), with all relevant licences and permits to be obtained where applicable. Given the potential harm to human health during handling and use of any of hazardous substances it is essential that all staff be trained with regards to the proper handling of these substances as well as First Aid in the case of spillage or intoxication. Storage areas for all substances should be bunded and capable to hold 120% of the total volume of a given substance stored on site. 				
Social	 Ensure locals enjoy priority in terms of job opportunities, to the extent possible, for skills that are available locally. Ensure local procurement where commodities are available locally. 				

5.3 OPERATION AND MAINTENANCE PHASE

The management actions included in Table 5-3 below apply during the operation and maintenance phase of this development.

 Table 5-3:
 Operation and maintenance management actions

OPERATION AND MAINTENANCE PHASE							
Impact	Impact Mitigation Measures						
Environmental monitoring and Evaluation	 An Environmental Practitioner should monitor the implementation of the EMP, and recommend any changes to this document when necessary. The Environmental Practitioner should inspect the site on a regular basis (preferably monthly or bi-monthly). Biannual reports are to be submitted to the Environmental Commissioner. 						

OPERATION AND MAINTENANCE PHASE						
Impact	Mitigation Measures					
Surface and Ground Water	 No dumping of waste products of any kind in or in close proximity to any drainage lines or water bodies. Contaminated runoff from the various operational activities should be prevented from entering any drainage lines or water bodies. Should it be necessary to wash equipment such as panels, wastewater should be properly managed to prevented contamination of ground or any surface water sources. Ensure that surface water accumulating on-site are channelled and captured through a proper drainage water management system to be treated in an appropriate manner before disposal into the environment. Wastewater should not be discharged directly into the environment. Disposal of waste from the development should be properly managed and taken to the relevant disposal facilities. Bi-annual monitoring of erosion especially in the vicinity of PV arrays should be conducted regularly to ensure erosion sites can be identified and remedied early enough. Ensure that oil/ fuel spillages from vehicles and machinery are minimized and that where these occur, that they are appropriately dealt with. Ensure regular inspections and maintenance of equipment. All materials on the site should be properly managed and taken to an approved landfill site. Ablution facilities at the site should be properly managed and taken to an approved landfill site. Ablution facilities at the site should be properly managed and taken to an approved landfill site. Site equipment should be regularly serviced. Site equipment should be regularly serviced. Site equipment should be refueled in paved areas with a collection point in case of any spillage. The service infrastructure should be designed and constructed by suitably qualified engineering professionals. 					
Visual and Sense of Place	 Develop and implement a preventative maintenance plan for the service infrastructure. It is recommended that more 'green' technologies be implemented within the architectural designs and building materials of the development where possible in order to minimise the visual prominence of such a development within the more natural surrounding landscape. Natural colours and building materials such as wood and stone should be incorporated. 					

	OPERATION AND MAINTENANCE PHASE				
Impact	Mitigation Measures				
Noise	 Limit the types of activities that generate excessive noise. All areas where noise levels are above 85 dB should be managed and controlled in accordance with the relevant guidelines. Continuous monitoring of noise levels should be conducted to make sure the noise levels do not exceed acceptable limits. Maintain equipment used during the operation and keep them in a good state such that they do not emit excessive noise. 				
Impact on human health	 No activity having a potential noise impact should be allowed after 18:00 if possible. Prolonged exposure in the vicinity of transformers should not exceed 1 hour at a distance of not less than 2.62 m. The prescribed servitudes to be observed. 				
Air quality	 The plant operation itself is not expected to give off dust or emissions as compared to the fossil fuel-based electricity generation plants, which emit greenhouse gases and other noxious gases. Use appropriate dust suppression measures when dust generation is unavoidable, e.g. dampening with water, particularly during prolonged periods of dry weather. 				
Waste management	 The proponent shall put in place a waste management plan aimed at minimizing the production of all wastes. The area will be kept free of waste, except in designated waste storage areas. Any wastes distributed by winds will be regularly cleaned up. A sufficient number of waste bins should be placed around the site for the soft refuse. A sufficient number of skip containers for the heavy waste and rubble should be provided for around the site. Solid waste will be collected and disposed of at an appropriate local waste disposal site. Place priority on waste reduction, waste reuse and waste recycling, in that order. 				

	OPERATION AND MAINTENANCE PHASE				
Impact	Mitigation Measures				
Fire and Explosion Risks	 Substations will have lighting protection to reduce fires caused by lighting by employing the latest technology. In addition, the plant will deploy robust integrated forest fire management systems to prevent and manage fire outbreak and contain the spread thereof to neighbouring farms. Plant to be monitored with a drone 8-10 times a day. Drone will see if solar panels are tempered with, removed, or broken, but also will see hotspots (infrared camera). That way fires (if any) can be detected at early stage. Emergency response procedures should be in place so as to alert the employees on how to react to fire and explosions incidents. Establish and maintain designated smoking areas at the site. Avoid smoking in areas that are close to fire hazard areas and environments, such as areas of dry vegetation. Ensure that sufficient fire-fighting equipment is available at the development. Firefighting equipment is to be suitably maintained. Supply appropriate signage and relevant emergency contact details at the development and displayed outside the site building. Do not allow informal cooking or warming fires at the development. Appoint a fire officer who shall be responsible for coordinating emergency response in the event of a fire according to the Emergency Response Plan. It is highly recommended that electrical wiring of the development be installed and approved by a qualified engineering professionals who will issue a Certificate of Compliance. 				
Quality of life	 Ensure locals enjoy priority in terms of job opportunities, for skills that are available locally, to the extent possible. Ensure local procurement where commodities are available locally. 				
Infrastructure development	• Ensure that the infrastructure is designed and supervised by suitably qualified engineering professionals.				

5.4 DECOMMISSIONING PHASE

The decommissioning of this development is not foreseen. In the event that this development is decommissioned the following management actions in **Table 5-4** should apply.

Table 5-4:	Decommissioning	phase r	nanagement actions

Environmental Feature	Management Actions
Deconstruction activity	 At the end of its useful life, the plant will be completely dismantled so as to restore the area to ante operam conditions. Because each production unit will be uninstalled, the following waste will be produced: Panels: aluminium, glass, cells and polymer waste; Electricity lines: copper and metallic elements; Pipes; Supporting structures: metallic elements; Unless these materials are disposed of properly, they can cause irreversible damage to the environment (surface and underground water, vegetation and animals), as well as to human health due to pollution of aquifers for example, and the deterioration of environmental conditions.
Rehabilitation	 A full decommissioning plan should be developed within the first 24 months of operation, however the following management actions are recommended as a minimum: Reusable, recyclable and scrapable components will be selected. Disposal will consist of disassembling the modules and sending them to a suitable recycling platform which will carry out the following recovery work:

Environmental Management Plan - #Gaingu Green Energy Solar Plant, Erongo Region

Environmental Feature	Management Actions
	recovery of aluminium frames;
	 recovery of glass material;
	 recovery of cells;
	decommissioning of the polymer material covering the cells.
	• The electricity lines of all the systems such as lighting will be removed by carrying out only the absolute necessary excavation work.
	• Copper from electricity cables and windings as well as other metallic parts will be sent to specialised centres for recovery and recycling.
	• Appliances such as inverters, control panels and transformers will be disassembled and sent to specialised companies for disposal.
	• Piping and electrical drawpits will be removed by excavating a set size excavation and the original situation will be restored using the excavated material.
	• The exposed parts of the photovoltaic module supporting structures will be removed mechanically, whereas the foundation piles sunk into the ground will be extracted.

Appendix A - Water Quality Guidelines

ANNEXURE

Water Quality Standards for Effluent

			Special	General
	LINUT	FORMAT	Standard	Standard
	UNIT	FORMAT	95 percentii	e requirements
PHYSICAL REQUIREMENTS			Not more than 10°C	higher than the recipient
Temperature	° C			er body
Turbidity	NTU		< 5	< 12
рН			6,5-9,5	6,5-9,5
Colour	mg/litre Pt		< 10	< 15
Smell			No offe	nsive smell
Electric conductivity 25 °C	mS/m		q	he intake potable water uality
Total Dissolved Solids	mg/litre			the intake potable water uality
Total Suspended Solids	mg/litre		< 25	< 100
Dissolved oxygen	% saturation		>75	>75
Radioactivity	units			r quality of the recipient er body
ORGANIC REQUIREMENTS				
Biological Oxygen Demand	mg/litre	BOD	< 10	< 30
Chemical Oxygen Demand	mg/litre	COD	< 45	< 100
Detergents (soap)	mg/litre		< 0.2	< 3
Fat, oil & grease, individual	mg/litre	FOG	nil	< 2.5
Phenolic compounds	μg/litre	as phenol	< 0.01	< 0.10
Aldehyde	μg/litre μg/litre	101	< 50	< 100
Adsorbable Organic Halogen		AOX	< 50	< 100
INORGANIC MACRO DETERMI	NANTS			
Ammonia (NH ₄ – N)	mg/litre	N	< 1	< 10
Nitrate (NO ₃ - N)	mg/litre	N	< 15	< 20
Nitrite (NO ₂ - N)	mg/litre	Ν	< 2	< 3
Total Kjeldahl Nitrogen (TKN)	mg/litre	Ν	< 18	< 33
Chloride	mg/litre	CI	< 40 mg/litre above the intake potable water quality	< 70 mg/litre above the intake potable water quality
Sodium	mg/litre	Ν	< 50 mg/litre above the intake potable water quality	<90 mg/litre above the intake potable water quality
Sulphate	mg/litre	SO ₄	< 20 mg/litre above the intake potable water quality	< 40 mg/litre above the intake potable water quality
Sulphide	μg/litre	S	< 0.05	< 0.5
Fluoride	mg/litre	F	1,0	2,0
Cyanide (Free)	μg/litre	CN	< 30	< 100
Cyanide (recoverable)	μg/litre	CN	< 70	< 200
Soluble Ortho phosphate	mg/litre	Р	< 0.2	3,0
Zinc*	mg/litre	Zn	1	5

			Special Standard	General Standard	
DETERMINANTS	UNIT	FORMAT	95 percentile	requirements	
INORGANIC MICRO DETERMINANTS	3	I	F	T	
Aluminium	μg/litre	AI	< 25	< 200	
Antimony	μg/litre	Sb	< 5	< 50	
Arsenic	μg/litre	As	< 50	< 150	
Barium	μg/litre	Ba	< 50	< 200	
Boron	μg/litre	В	< 500	< 1000	
Cadmium*	μg/litre	Cd	< 5	< 50	
Chromium, (hexavalent)	μg/litre	Cr	< 10	< 50	
Chromium, Total*	μg/litre	Cr	< 50	< 1000	
Copper*	μg/litre	Cu	< 500	< 2000	
Iron	μg/litre	Fe	< 200	< 1000	
Lead*	μg/litre	Pb	< 10	< 100	
Manganese	μg/litre	Mn	< 100	< 400	
Mercury*	μg/litre	Hg	< 1	< 2	
Nickel	μg/litre	Ni	< 100	< 300	
Selenium	μg/litre	Se	< 10	< 50	
Strontium*	μg/litre	Sr	< 100	< 100	
Thallium	μg/litre	Ti	< 5	< 10	
Tin*	μg/litre	Sn	< 100	< 400	
Titanium	μg/litre	Ti	< 100	< 300	
Uranium*	μg/litre	U	< 15	< 500	
*Total for Heavy Metals (Sum of Cd,Cr,Cu,Hg,Pb	μg/litre	Cd,Cr,Cu, H g & Pb	< 200	< 500	
UNSPECIFIED COMPOUNDS FROM	ANTHROPOGE	ENIC ACTIVITIES			
Agricultural chemical compounds	μg/litre		agro-chemical is to be far as possible. Ma contaminant levels dependent on chemica water quality of the	ound recognized as an avoided or reduced as aximum acceptable will be site specific, al usage and based the recipient water body	
Industrial and mining chemical compounds, including unlisted metals and persistent organic pollutants	μg/litre		Any in-/ organic compound recognized as an industrial chemical including unlisted metals is to be avoided or reduced as far as possible. Maximum acceptable contaminant levels will be site specific dependent on chemical usage and based the water quality of the recipient water body		
Endocrine Disruptive Compounds (EDC)	μg/litre		Any chemical compound that is suspected of having endocrine disruptive effects is to be avoided as far as is possible. Maximum acceptable contaminant levels will be site specific dependent on chemical usage and based the water quality of the recipient water body.		
Hydrocarbons (Benzene, Ethyl Benzene, Toluene and Xylene	μg/litre		Below detection level	Below detection leve	
Organo-metallic compounds: methyl mercury, tributyl tin (TBT), etc.	μg/litre		Below detection level	Below detection leve	
DISINFECTION					
	<i></i>		< 0.1	< 0.3	
Residual chlorine	mg/litre		Dependent on recipient water body	Dependent on recipient water body	

Effluent to be discharged or disposed of in areas with potential for drinking water source contamination; international rivers and dams and in water management and other areas						
		_	Special Standard	General Standard		
DETERMINANTS	UNIT	FORMAT				
BIOLOGICAL REQUIREMENTS (Algae and	d parasites)					
 Further treatment of the effluent dependent on: 1. the water quality of the recipient water body if any 2. the distance from any point of potable water abstraction 3. an acceptable maximum contaminant level downstream of the point of discharge 4. the exposure to human and animal consumption downstream of the point of discharge 5. any reuse option that may be implemented. 						
Further treatment of the effluent are depended 1. the water quality of the recipient w 2. the distance from any point of pota 3. an acceptable maximum contamin 4. the exposure to human and anima 5 any water reuse option that may b	vater body if any able water abstrac ant level downstr I consumption do	eam of the point				

ANNEXURE

 Table 1. Water Quality Guidelines and Standards for Potable Water

Specifications for water quality	intended for h	uman consu supply	mption fro	m the source and	piped water
Status				Ranges and upper limits	
Interpretation				(Ideal guideline)	(Acceptable Standard)
DETERMINANTS	Unit	Format	Concern	95 Percentile I	Requirement
PHYSICAL AND ORGANOLEPTIC REC	UIREMENTS	•			
Temperature	° C		E	Ambient temperature	
Colour	PTU	or mg/litre	E	10	<15
Taste			O,E	No objection	able taste
Odour			O,E	No objectionable odour	
Turbidity (treated surface water)	NTU	or TU	H,I	< 0,3	< 0,5
Turbidity (groundwater)	NTU	or TU	H,I	< 0,5	<2
рН @ 20 °С	рН		I	6.0 to 8,5	6 to 9
Electric Conductivity @ 25 °C	mS/m***	E.C.	H,I	< 80	< 300
Total Dissolved Solids	mg/litre		H,I	< 500	< 2 000
INORGANIC MACRO DETERMINANTS					
Ammonia	mg/litre	N	н	< 0.2	< 0.5
Calcium	mg/litre	Ca	I.	< 80	< 150
Chloride	mg/litre	CI	H,I	< 100	< 300
Fluoride	mg/litre	F	н	< 0.7	< 2,0
Magnesium	mg/litre	Mg	н	< 30	< 70
Nitrate	mg/litre	N	н	< 6	< 11
Nitrite	mg/litre	NO ₂	н	< 0.2	< 0.5
Potassium	mg/litre	К	н	< 25	< 100
Sodium	mg/litre	Na	H.I	< 100	< 300
Sulphate	mg/litre	SO ₄	H,O	100	< 300
Asbestos (fibres longer than 10 μm)	Fibres/litre		н	<500 000	< 1000 000
INORGANIC MICRO DETERMINANTS					
Aluminium	μg/litre	AI	н	< 25	< 100
Antimony	μg/litre	Sb	н	< 5	< 50
Arsenic	μg/litre	As	н	<10	< 50
Barium	μg/litre	Ва	н	0,5	< 2
Beryllium	μg/litre	Ве	н	< 2	< 5
Bismuth	μg/litre	Bi	н	< 250	< 500
Boron	μg/litre	В	н	< 300	< 500
Bromide	μg/litre	Br	н	< 500	< 1 000
Cadmium	μg/litre	Cd	н	< 5	< 10
Cerium	μg/litre	Ce	н	<1 000	<2 000
Cesium	μg/litre	Cs	н	< 1 000	< 2 000
Chromium Total	μg/litre	Cr	н	< 50	< 100
Cobalt	μg/litre	Co	н	< 250	< 500
Copper	μg/litre	Cu	н	< 500	< 2 000

Specifications for water quality	intended for	human cons supply	umption fror	n the source and	piped water
Status				Ranges and upper limits	
Interpretation				(Ideal guideline)	(Acceptable Standard)
DETERMINANTS	Unit	Format	Concern	95 Percentile	Requirement
INORGANIC MICRO DETERMINANTS					
Cyanide (free)	μg/litre	CN [.]	н	< 20	< 50
Cyanide (recoverable)	μg/litre	CN ⁻	н	< 70	< 200
Iron	μg/litre	Fe	H,E	< 200	< 300
Lead	μg/litre	Pb	н	<10	< 50
Manganese	μg/litre	Mn	н	< 50	< 100
Mercury	μg/litre	Hg	н	< 1	<2
Nickel	μg/litre	Ni	н	< 50	< 150
Selenium	μg/litre	Se	н	< 10	< 50
Thallium	μg/litre	Ti	н	< 5	< 10
Tin	μg/litre	Sn	н	<100	<200
Titanium	μg/litre	Ti	н	< 100	< 300
Uranium	μg/litre	U	Н	< 3	< 15
Vanadium	μg/litre	v	н	< 100	< 500
Zinc	μg/litre	Zn	н	< 1 000	< 5 000
Organo-metallic compounds	μg/litre	-	н	below detection limit	below detection limit
ORGANIC DETERMINANTS					
Dissolved Organic Carbon	mg/litre	DOC-C	н	< 5	<10
Phenol compounds	μg/litre	phenol	н	< 5	< 10
DISINFECTION AND DISINFECTION BY	-PRODUCTS				
Bromodichloromethane (Part of THM)	μg/litre		н	< 20	< 50
Bromoform (Part of THM)	μg/litre		н	< 40	< 40
Chloroform (Part of THM)	μg/litre		н	< 20	< 100
Dibromomonochloro-methane (Part of THM)	μg/litre		н	< 20	< 100
Trihalomethanes (Total)	µg/litre	ТНМ	н	< 100	< 150
Bromate	µg/litre		н	< 5	< 10
Chloramines	mg/litre	Cl ₂	н	< 2	< 4
Chlorine dioxide	µg/litre		н	< 400	< 800
Chlorite	μg/litre	1	н	< 400	< 4000
Chlorate	μg/litre		н	< 200	< 700
Haloacetic acids	μg/litre	1	н	not detected	< 60
Chlorine, free, after 30 min; GENERAL	mg/litre	Cl ₂	H,I	0,1 – 0,5	0,1 - 3,0
Chlorine, free, after 30 min; SPECIFIC	mg/litre	Cl ₂	Turbidity: < 0,3 NTU	0,1	0,1 - 3,0
Chlorine, free, after 30 min; SPECIFIC	mg/litre	Cl ₂	Turbidity: > 0,3 NTU	0,5	0,1 - 3,0
Chlorine, free, after 60 min; SPECIFIC	mg/litre	Cl ₂	Turbidity: >1,0 NTU	1,0	0,1 - 3,0

Specifications for water quality in	ntended for	human cons supply	sumption from	m the source and	piped water
Status				Ranges and upper limits	
Interpretation				(Ideal guideline)	(Acceptable Standard)
DETERMINANTS	DETERMINANTS Unit Format Concern				Requirement
BIOLOGICAL REQUIREMENTS					
Algae					
Chlorophyll α	μg/litre		E,O	< 1	< 2
Blue-green algae	cells	/ml	H,O	< 200	<2 000
Mycrocystin	µg/litre		Н	< 0.1	< 1
Geosmin	ηg/litre		E, H	< 15	< 30
2-Methyl Iso Borneal (2 MIB)	ηg/litre		Е, Н	< 15	< 30
OTHER DETERMINANTS					
Agricultural chemical compounds			н	Any organic recognized as an should be in acco WHO and EPA	agro-chemical ordance with the
Industrial chemical compounds			н	Any organic compound recognized as an industrial chemical should be in accordance with the WHO and EPA requirements.	
Endocrine disruptive chemicals			н	Any chemical compound that is suspected of having endocrine disruptive effects shall be in accordance with the WHO and EPA requirements.	
RADIOACTIVITY			95 Percentile Requirement		
Gross alpha activity	Bq/litre		н	< 0.2	< 0.5
Gross beta activity	Bq/litre		Н	< 0.4	< 1.0
If Gross alpha and beta is above specification calculate Dose based on individual radionuclide concentrations mSv/a			Н	≤ 0.04	≤ 0.1
ANALYSIS QUALITY CHECK***					
lon balance: Total anions			-	 < 3 -Tolerance = 0.2 m equivalent 3-10 - Tolerance 2% on +- balance 10-800 - Tolerance 5% on +- balance 	
TDS Balance: determined / calculated	ratio		-	~ 1	~ 1
Ratio TDS / EC (EC as μ S/cm) "Concern" refers to impact if the limit is tra	ratio		-	~ 0,66	0,55 – 0,7

"Concern" refers to impact if the limit is transgressed: H = health concern; O = organoleptic effect; I = effect on infrastructure, structural; E = aesthetic effect * Based on a viral cell culture-dependent method and not on cell culture-independent methods (e.g. PCR) *** Indicative of faecal pollution having occurred, even when the residual disinfectant levels are safe. **** Comply with SANAS Guidelines

MICROBIOLOGICAL REQUIREMENTS APPLICABLE TO ALL POTABLE WATER					
Microbiology	cfu			95 percentile	1 of samples maximum
Heterotrophic bacteria HPC or TCC	counts	/ml		100 at 37º C	1 000 at 37º C
Total Coliform	counts	/100 ml	Н	0	5
E.Coli	counts	/100 ml	Н	0	1
Entrerococci	counts	/100 ml	Н	0	1
Somatic Coliphage	counts	/100 ml	Н	0	1
Clostridium perfrigens inclusive spores	counts	/100 ml	н	0	1
Enteric viruses	viral count*	/10 L	Н	0	1
Parasites (Protozoa) applicable to all po	95 percentile	99 percentile			
Giardia lamblia	cysts	/100 litre	Н	0	1
Cryptosporidium	oocysts	/100 litre	Н	0	1
Giardia lamblia and Giardia lamblia (Grab sample)	cysts or oocysts	/10 L	н	0	0

Table 2: Microbiological and Biological Requirements

Table 3: Special Requirements for the Protection of Infrastructure

Specifications for water quality intended for human consumption from the source and piped water supply for the protection of infrastructure against corrosion						
Status				Ranges and upper limits		
Interpretation				(Ideal guideline)	(Acceptable Standard)	
DETERMINANTS Unit Format Concern 95 Percentile requireme				le requirement		
CORROSIVE AND SCALING PROPERTIES						
Calcium Carbonate Precipitation Potential	mg/litre	ССРР	I	4 - 5	3 - 6	
Alkalinity/Sulphate/ Chloride Ratio	Equi- valents	Corrosivet y Ratio	I	With SO₄ and Cl above 50 mg/litre Ratio=(Alk/50)/(SO₄/48+Cl/35.5) > 5.0 Water is Stable Ratio= (SO₄/48+Cl/35.5)/(Alk/50) > 0.2 Water is Corrosive		
Total Hardness (Ca & Mg)	mg/litre	CaCO₃	I	<200	< 400	

Table 4: Frequency of Microbiological Monitoring for Bulk Water Supply

Size of population served	Turbidity 95%**	Frequency of sampling
> 250 000	< 0,5 NTU	Thrice weekly ***
100 001 – 250 000	< 1,0 NTU	Twice weekly
50 001 – 100 000	< 1,0 NTU	Once weekly
10 001 – 50 000	< 1,0 NTU	Three times every month
< 10 000 reticulated	< 1,0 NTU	Once every 1 month*
< 10 000 non-reticulated	1 – 2 NTU	Once every 1 month*

Upon complaints by the consumers or of medical practitioners and after incidents such as pipe breaks, the frequency should be increased until the situation has returned to original counts and been declared safe;
 ** Average or 95 percentile turbidity of the water supplied
 *** The frequency should be stepped up by one extra sampling per week for every 100 000 residents

(including the estimated number of visitors residing within the area at any time) in the area served, over and above 250 000.

General Information

- 1. The area being monitored shall be defined by the Minister in consultation with the Minister responsible for health and, where applicable, relevant officials from the Regional and Local Authorities;
- 2. At the time of sampling the operator shall also take a "free chlorine" reading of the same water under examination but prior to sampling for microbiological sampling, whilst using a portable device designed for that purpose and accepted by the Minister; this 'reading' is to be recorded and reported together with the results from the microbiological analyses;
- 3. As for field 'screening' of water supplies for microbiological contamination there exist portable devices designed for that purpose and accepted by the Minister; these 'readings' are to be recorded and reported together with the results from the microbiological analyses;
- 4. The results of the microbiological monitoring together with the free chlorine readings is to be reported as per mutual agreement to the ultimate supplier (bulk water supplier, Local Authority, or any other supplier) for remedial action where required, and to the Minister for record and monitoring purposes and follow up actions;
- 5. The costs of routine monitoring shall be borne by the authority commissioning the monitoring;

Methodology for Sampling and Analyses

The methodologies followed for sampling and during transit and storage of samples prior to analysis shall be as prescribed.

- 1. Preferably samples are to be taken in borosilicate glass bottles with a glass or polypropylene screw-cap lid;
- 2. Where this is not feasible or practical polyethylene bottles with internal seal and with screw-lid can be used;
- 3. Samples shall, as far as practical, be analysed within 24 hours of sampling;
- 4. Where there are special requirements for the period between sampling and analysis to be less than 24 hours, such requirement should be attended to as far as is practical;
- 5. Samples are to be kept and stored, even during transit, at as low a temperature as is practically manageable, whilst preventing the risk of the sample freezing;
- 6. The sample shall be kept away from light and shielded from sunlight, to reduce chances of micro-/biological growth to a minimum;
- 7. The use of preservation chemicals should be considered, planned and executed with extreme care;
- 8. Where sample preservation is appropriate or required an extra smaller volume sample should be taken so as to not upset any other analyses that are affected by the preservation chemical(s);
- Certain determinants may be monitored 'in the field' at the time of sampling; such field-data are to be measured in a receptacle or container different from the sample container; data so obtained shall be recorded as "field measurement" and cannot replace laboratory analysis for the parameters concerned;
- 10. The methodologies followed for physical, chemical and microbiological analysis shall be in agreement with the specifications listed in the latest edition of the SANS 241, Drinking Water Standards, published by the SABS.
- 11. The cost of routine, regulatory inspections and monitoring, for the purpose of fulfilling the provisions of this regulation shall borne by the service provider.