

ENVIRONMENTAL MANAGEMENT PLAN

FOR THE REZONING OF ERVEN 4753 EXTENSION 15 AND 5515, EXTENSION 18, RUNDU FROM “SINGLE RESIDENTIAL” TO “BUSINESS” FOR THE FORMALIZATION OF THE EXISTING BUSINESS IN RUNDU TOWN, KAVANGO EAST REGION, NAMIBIA.



OCTOBER 2022

Prepared by:	Prepared for:
NGHIVELWA PLANNING CONSULTANTS	Rundu Town Council
P. O. Box 40900, Ausspannplatz	Private Bag 2128, Rundu
CEL: +264 85 323 2230	Tel: +264 66 266 400
E-MAIL: planning@nghivelwa.com.na	Email: adriano@rundutown.org



Environmental Management Practitioners

Name of representative of the EAP	Education qualifications	Professional affiliations
Nghivelwashisho Natangwe Ndakunda	B-Tech Town and Regional Planning	Namibia Council of Town and Regional Planners
Ndati-Onawa N Ndakunda	Master of Science in Integrated Environmental Management and Sustainable Development	Geoscience Council of Namibia Geoscience Council of Namibia, Environmental Scientist (EAPAN Member)

Client

Name	Position/ Role	Address
Rundu Town Council	Rundu Town Council(Proponent)	Private Bag 2128, Rundu

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

Contents	
INTRODUCTION AND BACKGROUND	4
PROJECT DESCRIPTION	4
SCOPE	4
POLICY AND OTHER RELEVANT LEGISLATIONS	5
PROJECT LOCALITY	8
MANAGEMENT PRINCIPLES	8
Environmental Issues to be managed	9
Operational Phase	9
Consultation with Interested and Affected parties (IAPs)	9
ROLES AND RESPONSIBILITIES	9
Competent Authority	9
Tsumeb Guest House Kamho (Applicant)	9
Tsumeb Guest House Kamho (Project Manager)	10
Contractor’s Safety Officer	10
Contractors	10
Resident Engineer (RE)	11
PHASES OF THE PROJECT	12
The Operational Phase	12
ENVIRONMENTAL MONITORING PLAN	15

INTRODUCTION AND BACKGROUND

The Rundu Town Council has proposed the Rezoning of Erven 4753, Extension 15 and 5515, Extension 18, Rundu from “Single Residential” to “Business”. The rezoning is required in order to formalize the already constructed businesses that are will be part of a broader business formalization project that the Rundu Town Council has embarked on to align the land uses on the ground with the town’s Zoning Scheme.

Nghivelwa Planning Consultants have been appointed to conduct an Environmental Management Plan (EMP) for the proposed rezoning and formalization of the existing businesses.

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 Rezoning of Erven 4753, Extension 15 and 5515, Extension 18, Rundu from “Single Residential” to “Business” to allow for the formalization of existing taverns that are situated on the subject properties. The project is located in the town northern town of Rundu, Rundu Urban Constituency of the Kavango East Region.

The project involves the formalization of existing buildings and Municipal infrastructure of Water, Sewerage and Electricity to cater for the already constructed taverns. 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 already existing businesses; 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 guides the rezoning process and associated environmental management activities:

	Instruments and Content	Application to the project
The Constitution of the Republic of Namibia	<i>General human rights – eliminates discrimination of any kind The right to a safe and healthy environment Affords protection to biodiversity</i>	<i>Ensure these principles are protected in the documentation of the exploration project</i>
Environmental Management Act EMA (No 7 of 2007)	<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>	

Forestry Act No 27 of 2004	<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>
Hazardous Substances Ordinance 14 of 1974:	<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>
The Nature Conservation Ordinance (No. 4 of 1975)	<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>
Forestry Act 12 of 2001 Nature Conservation Ordinance 4 of 1975	<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>
Convention on Biological Diversity, 1992	<i>Protection of biodiversity of Namibia</i>	<i>Conservation-worthy species not to be removed if not absolutely necessary.</i>
Water Act 54 of 1956 Water Resources Management Act 24 of 2004	<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>	
National Heritage Act 27 of 2004	<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>
Labour Act 11 of 2007	<i>Details requirements regarding minimum wage and working conditions (S39-47).</i>	<i>Employment and work relations</i>
Health and Safety Regulations GN 156/1997 (GG 1617	<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>
Public Health Act 36 of 1919	<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>Rundu Town Council 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>
Water Act 54 of 1956	<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: Prohibits the pollution of underground and surface water bodies (S23(1)). 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>
Urban and Regional Planning Act (Act 5 of 2018)	<i>The Urban and Regional Planning Act 5 of 2018 regulates the process of rezoning and changing of land uses within urban areas of Namibia.</i>	<i>The rezoning of the properties from “Residential” to “Business” should be carried out in accordance with the Act.</i>
Liquor Act, 6 of 1998.	<i>The Liquor Act no 6 of 1998 as amended regulates the sale of liquor and the time that the sale of liquor is allowed.</i>	<i>The sale of liquor at the business should only be allowed with a valid liquor license and at times as prescribed by the license.</i>

PROJECT LOCALITY

The project is located in the northern Namibia on Erf 4753, located in Extension 15 and Erf 5515, located in Extension 18 of Rundu Town, Rundu Urban Constituency of Kavango East region. The geographic coordinates of the locations are:

- Erf 4753: -17.916473°, 19.788336°
- Erf 5515: -17.905470°, 19.791928°

As per the locality google image below.



MANAGEMENT PRINCIPLES

These guidelines and 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. Rundu Town Council, 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. The Rundu Town Council 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 (Rundu Town Council) and IAPs to ensure that queries, complaints or suggestions can be addressed 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.

Rundu Town Council (Applicant)

The role of the applicant is as follows:

The Rundu Town Council 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 warning and impose fines and penalties on the Contractor if the Contractor neglects to implement the EMP satisfactorily.
- Protect the environment and rehabilitate the environment.

Rundu Town Council (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
Increased employment opportunities	Equity, transparency, should be put into account when hiring and recruiting and that community leaders should also take part in the recruiting process.	<p>Although the businesses are already in operation the principles of gender equality and maximizing local employment should be implemented in future recruitment processes.</p> <p>Future vacancies for professional services should be offered to Namibians.</p> <p>Other Labor or services (e.g. security guards) should be sourced from the local supplies or Security Companies within Rundu.</p>	Monitored once off by the Project Manager/Rundu Town council	Appointed Contractor/ Rundu Town Council
Improved aesthetic look of the area	Although the buildings are already constructed, the approval of this development will encourage	The developer should create awareness among the staff working in the proposed offices about energy	Regular visual inspection by Project Manager	Rundu Town Council

	<p>the owners to renovate the existing buildings and to improve the aesthetic look of the surrounding area.</p>	<p>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 are already 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>		
Water demand	<p>Namibia is a water scarcity country, therefore, the additional development like this one will increase the water demand.</p>	<p>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 importance of saving water to reduce water consumption.</p>	<p>Monitored once off by the EO</p>	<p>Rundu Town Council</p>
Power usage	<p>Namibia is experiencing power shortage, therefore electricity should be used wisely in order to sustain the future generation and to</p>	<p>Power should be off in areas that are not in use/avoid unnecessary lights:</p> <p>Avoid unnecessary use of office electronic equipment.</p>	<p>Monitored once off by the EO</p>	<p>Rundu Town Council</p>

	minimize greenhouse gasses emissions.	<p>Unplug unused electronics</p> <p>Encourage use of renewable energy i.e. Solar lights at parking and solar geysers to supplement the electricity supply</p>		
Waste management	Domestic waste generated from ablution facilities and other domestic waste generated on site.	<p>The Rundu Town Council is responsible for the disposal of municipal waste in the town of Rundu and that includes the waste disposal on site.</p> <p>The waste disposed should be done in accordance with the Rundu Town Waste Disposal Strategy and should be disposed of at an approved waste disposal site.</p> <p>Ensure maintenance of sewage system and outlaw illegal dumping of waste.</p>	Regular inspection By EO	Rundu Town Council
Noise Pollution	Business activities tends to generate noise, especially when there is consumption of alcohol involved.	Ensure that the business operate during the approved business hours and as per the approved liquor license.	Regular inspection by the Rundu Town Council	Rundu Town Council

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.					
---	--	--	--	--	--