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Operational Environmental Management Plan (EMP) for the existing Torra Bay campsite in the Erongo Region

EMP

Final

2 November 2021

Namibia Wildlife Resorts

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1 OVERVIEW

1.1 Project Background

Namibia Wildlife Resorts (NWR) is a state-owned enterprise, mandated to run the tourism facilities within the protected areas of Namibia. NWR has several operations across the country which are owned and managed by NWR. The majority of the facilities were constructed prior to the commencement of the Environmental Management Act (EMA) (7 of 2007). As such, Environmental Impact Assessments (EIA) were never conducted for these facilities. However the facilities are still required to comply with the provisions of the EMA and its regulations. It is therefore required that Environmental Management Plans (EMPs) be developed and implemented for the existing facilities.

1.2 Site Description

Torra Bay Campsite is located around 200 km north of Hentiesbaai, along the western coast of Namibia. The campsite is located on the beach within the Skeleten Coast National Park. The locality of Torra Bay is depicted in **Figure 1-1** below.

Figure 1-1: Locality map of Torra Bay

Torra Bay Campsite is a popular fishing retreat, situated within the Skeleton Coast National Park. Torra Bay is only open in December and January. Torra Bay is famous in the angling circle due to the variety and quantity of fish that come down the Atlantic current. Other activities include bird watching and walking along the beach.

1.2.1 Engineering Services

1.2.1.1 Waste Disposal

The general waste at Torra Bay Campsite is collected in general waste bins onsite as shown in **Figure 1-2** below. The waste is then loaded on a truck and disposed of at a landfill site at Terrace Bay.

Figure 1-2: General waste collection on site

1.2.1.2 Water

NamWater supplies water to Torra Bay Campsite, it is stored in water tanks on site and distributed within the facility. **Figure 1-3** below depicts the water engineering services on site.

Figure 1-3: Water Engineering services

1.2.1.3 Electricity

Torra Bay Campsite uses a generator for electricity. Torra Bay use donkey boilers for the hot water system.

1.2.1.4 Sewer

Torra Bay Campsite has flush toilets. **Figure 1-4** below depicts the ablution facilities available at the camp.

Figure 1-4: Ablution facilities on site

1.2.1.5 Access

Access to Mile 72 Rest Camp is gained via the C34 road from Henties Bay.

1.2.2 Fuel Garage

A fuel garage is located on site which is used to fuel up vehicles at the facility. The garage consists of only one fuel pump as depicted in **Figure 1-5** below.

Figure 1-5: Fuel garage on site

1.3 Environmental Sensitivity

The existing facility is located within the Skeleton Coast National Park (SCNP) which stretches along the northwestern part of the Namibian coast. The area was declared a national park to ensure the protection and management of wildlife, biodiversity, conservation and tourism within these areas. The map overleaf (Figure 1-6) is taken from the Skeleton Coast National Park Management Plan (2013) and depicts the areas which are identified and mapped based upon environmental sensitivity and following the International Union for Conservation of Nature and Natural Resources (IUCN) guidelines for protected areas (Lausche, 2011) and are divided according to the following categories:

- Highly sensitive areas (1a)
- Areas of medium sensitivity (2)
- Areas with general landscape or seascape value (5)

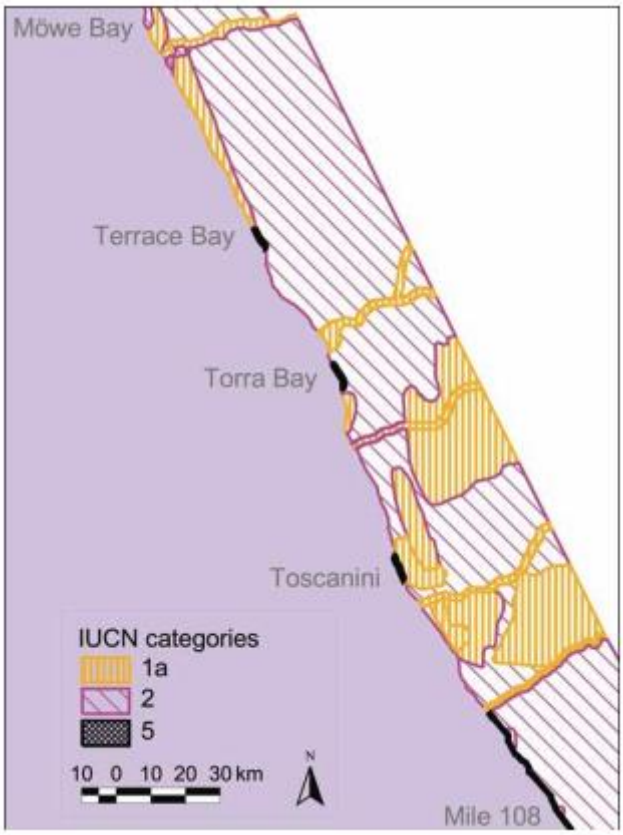

Figure 1-6: Areas of conservation priority and environmental sensitivity in the southern area of the SCNP (Ministry of Environment and Tourism, 2013)

The figure below depicts the zones and the corresponding activities that are permitted or restricted within the area. It further outlines the specific application in the Skeleton Coast National Park. As can be seen Torra Bay falls within an area with general landscape or seascape value. This area is generally open for the public and is thus not classified as highly sensitive. Overnighting is permitted at the areas demarcated within the Torra Bay facility only. Driving of 4x4 are permitted, these must remain on the tracks.

Zones	Activities	Specific application in the SCNP
Highly sensitive areas	• Highly sensitive and high value conservation / biodiversity areas set aside for sensitive and low non-intrusive scientific study • No or minimal mechanized access – except for officials on duty. • No permanent structures • No overnighting except by of ficials on duty	• Areas of high endemicity with highly range-restricted species: • All lichen fields and Damara Tern breeding areas • All wetlands – specifically the Uniab delta, lower Hoanib river (from the mouth to the dunes), Oasis, Auses, the Hoanib floodplain, the lower Hoarusib (from the poort till the park boundary), Sarusas spring, Okau fountain and the Kunene River mouth. • All vegetated dune hummocks
		• All inselbergs, notably Sarusas ridges, Agate Mountain • The entire intertidal zone (i.e. from the spring low water mark till the spring high water mark) • The Clay Castles in the Hoarusib • The geological formations in the lower Ugab valley
Areas of medium sensitivity	• Managed for conservation and controlled tourism • Mechanised access permitted • Overnighting only at designated sites	• Whole SCNP proclaimed under this category. The other categories are managed as land-use zones within the park. Where no other zone is provided, the zone is taken to be this category.
Areas with general landscape or seascape value	• Relatively open access for public enjoyment • Generally higher intensity and lower regulatory areas • Add to welfare of local communities	•]Terrace and Torra Bay angling areas. 4x4s allowed, but other than the beach area, they must stay on tracks. No overnighting except in the Terrace and Torra Bay demarcated areas. • Toscanini coastal village

Figure 1-7: Description of zones, activities and application in the SCNP(Ministry of Environment and Tourism, 2013)

1.4 Purpose of the EMP

An Environmental Management Plan (EMP) is defined as:

"*…a plan that describes how activities that may have significant environments effects on the environment are to be mitigated, controlled and monitored*."

An EMP is one of the most important outputs of the EA process as it synthesises all the proposed mitigation and monitoring actions, set to a timeline and with specific assigned responsibilities. It provides a link between the impacts identified in the Environmental Impact Assessment (EIA) Process and the required environmental management on the ground during project implementation and operation. It is important to note that an EMP is a legally binding document and a person who contravenes the provisions of this EMP may face imprisonment and/or a fine. This EMP is a living document and should be amended to adapt to project changes and/or environmental conditions and feedback from compliance monitoring.

The purpose of this document is therefore to guide environmental management throughout the following life-cycle stages of the proposed development including operation, and decommissioning.

The following phases are addressed in this EMP:

- **Operation** - the period during which the facilities are operational.
- **Decommissioning** – Should the development be closed; this phase will be implemented.

1.5 Environmental Assessment Practitioner (EAP)

GCS Water Environmental Engineering Namibia (Pty) Ltd ("GCS" hereafter) has been appointed by Namibia Wildlife Resorts (NWR) as independent environmental consultants to prepare the required Environmental Management Plan (EMP) for the proposed development. The EMP is to be submitted with the supporting documents as part of the application for an Environmental Clearance Certificate (ECC) to the Environmental Commissioner at the Department of Environmental Affairs (DEA) of the Ministry of Environment, Forestry and Tourism (MEFT). The EMP will also be used by Contractors as well as the Proponent in guiding them during the operations to ensure that impacts on the environment are limited or avoided altogether.

1.6 Legal Requirements

The contents of the EMP must meet the requirements Section 8 (j) of the EIA Regulations. The EMP must address the potential environmental impacts of the activity on the environment throughout the project life cycle. It must also include a system for assessment of the effectiveness of monitoring and management arrangements after implementation. NWR therefore has the responsibility to ensure that the proposed activity conforms to the principles of EMA and must ensure that any contractors appointed by them also comply with such principles.

1.6.1 The Environmental Management Act (Act No 7 of 2007)

The Environmental Management Act (EMA) and its Environmental Impact Assessment (EIA) Regulations (GG No. 4878 GN No. 30) applies to this project. Under the EMA the subject activities (envisaged as part of this project) are listed activities that may not be undertaken without an Environmental Clearance Certificate (ECC):

11.2 Construction of cemeteries, camping, leisure and recreation sites.

In light of the above, an ECC is required for the activities undertaken on the existing facility. Furthermore **Table 1-1** below lists the relevant Namibian legislation that is applicable to the activities, and which must be complied with during the project life-cycle.

Table 1-1: Applicable and relevant Namibian legislations and guidelines for the EA process

Legislation	Permit/Approval/Requirement	Contact Details
Environmental Management Act 2007 Environmental Impact Assessment (EIA) Regulations (EIAR) (GG No. 4878)	Amendments (required every 3 years) to this EMP will require an amendment of the ECC for these developments. Activities listed in Government Notice (GN) No. 29 of GG No. 4878 require an ECC.	Mr Damian Nchindo Department of Environmental Affairs, Ministry of Environment, Forestry and Tourism Tel: 061 284 2701
Water Act 54 of 1956	Prohibits the pollution of underground and surface water bodies (S23 (1)). Liability of clean-up costs after closure/abandonment of an activity (S23 (2)).	Mr Witbooi (Department of Water Affairs): Tel: (061) 208 7226

Legislation	Permit/Approval/Requirement	Contact Details
Water Resources Management Act No.11 of 2013	The act provides for the management, protection, development, use and conservation of water resources; and provides for the regulation and monitoring of water services and to provide for incidental matters. The objects of this Act are to: Ensure that the water resources of Namibia are managed, developed, used, conserved and protected in a manner consistent with, or conducive to, the fundamental principles set out in Section 66 - protection of aquifers, Subsection 1 (d) (iii) provide for preventing the contamination of the aquifer and water pollution control (Section 68).	
Forestry Act 12 of 2001	The Act provides for the management and use of forests and related products / resources. It offers protection to any living tree, bush or shrub growing within 100 metres of a river, stream or watercourse on land that is not a surveyed erven of a local authority area. In such instances, a licence would be required to cut and remove any such vegetation. These provisions are only guidelines.	If there are trees within the proposed footprint of the project area that need to be removed, the proponent should notify the local Forestry Department of the number and/or type of trees to be removed to allow exploration activities and apply for permit to remove protected tree species.
National Heritage Act (27 of 2004)	Part V Section 46 of the Act prohibits removal, damage, alteration or excavation of heritage sites or remains. Section 48 ff sets out the procedure for application and granting of permits such as might be required in the event of damage to a protected site occurring as an inevitable result of development. Section 51 (3) sets out the requirements for impact assessment. Part VI Section 55 Paragraphs 3 and 4 require that any person who discovers an archaeological site should notify the National Heritage Council. Heritage sites or remains are	Ms. Erica Ndalikokule National Heritage Council of Namibia erica@nhc-nam.org

Legislation	Permit/Approval/Requirement	Contact Details
	defined in Part 1, Definitions 1, as "any remains of human habitation or occupation that are 50 or more years old found on or beneath the surface".	
Namibia Tourism Board Act 21 of 2000	To establish the Namibia Tourism Board and to provide for its functions; to provide for the registration and grading of accommodation establishments; to provide for the declaration of any sector of the tourism industry as a regulated sector and for the registration of businesses falling within a regulated sector; and to provide for matters incidental thereto.	Namibia Tourism Board info@namibiatourism.com.na +264 61 290 6000
National Policy on Tourism 2008	The National Policy on Tourism for Namibia aims to provide a framework for the mobilisation of tourism resources to realise long term national goals defined in Vision 2030 and the more specific targets of the Third National Development Plan, namely, sustained economic growth, employment creation, reduced inequalities in income, gender as well as between the various regions, reduced poverty and the promotion of economic empowerment.	Department of Tourism and Gambling, Ministry of Environment, Forestry and Tourism +264 61 284 2178
Petroleum Products and Energy Act (Act 13 of 1990) and Regulations (2001)	Any facility intending to store fuel in bulk requires a Consumer Installation Certificate. S 4.12 prescribes the South African National Standards (SANS) as the criteria to which fuel installations must be constructed, operated and decommissioned. S 2 (1) requires a permit for the obtaining and use of up to 20 000 litres of used mineral oil per annum. Regulation 47 describes fire precautions. Regulation 46(2) requires the annual submission of Form PP/10 for all Consumer Installation certificate holders.	NWR must ensure that their fuel operations comply with the provisions of the Petroleum Products and Energy Act and its Regulations (2001). Ministry of Mines and Energy

1.7 Assumptions and Limitations

This EMP has been drafted with the acknowledgment of the following assumptions and limitations:

- This EMP has been drafted based on the scoping-level assessment of impacts conducted for the proposed development. No detailed specialist studies were included as part of the assessment; and
- The mitigation measures recommended in this EMP document are based on the risks/impacts which were identified based on the provided project description and site investigation. Should the scope of the project change, the risks will have to be reassessed and mitigation measures will be revised accordingly.

1.8 Report Structure

This EMP lays out the management actions for the existing operations at the site. The EMP addresses the following phases:

- **Operation phase**: the period during which the facility will be operational and conducted by the proponent and/or their contractors; and
- **Decommissioning phase**: the period during which the Proponent may decide to discontinue the operations and its associated activities.

2 ROLES AND RESPONSIBILITIES

Namibia Wildlife Resorts (the Proponent) is ultimately responsible for the implementation of the EMP. The Proponent may delegate this responsibility at any time, as they deem necessary, from planning and design to operation and maintenance phase and decommissioning phase (if considered). The delegated responsibility for the effective implementation of this EMP will rest on the following key individuals which may be fulfilled by the same person:

- Proponent’s Representative; and
- Environmental Control Officer.

2.1 Proponent's Representative

If the Proponent does not personally manage all aspects of the planning and design, operation and decommissioning activities, referred to in this EMP, they should assign this responsibility to a suitably qualified individual referred to in this plan as the Proponent's Representative (PR). The Proponent may decide to assign the role of a PR to one person for both phases. Alternatively, the Proponent may decide to assign a separate PR for each component i.e. operation, and decommissioning phase. The PR's responsibilities are included in **Table 2-1** below.

Table 2-1: Responsibilities assigned to the Proponent's Representative for the operation and decommissioning phases

Responsibility	Project Phase
Managing the implementation of this EMP and updating and maintaining it when necessary	Throughout the lifetime of the project
Management and monitoring of individuals and/or equipment on-site in terms of compliance with this EMP	Throughout the lifetime of the project
Issuing fines for contravening EMP provisions	Throughout the lifetime of the project

2.2 Environmental Control Officer

The Proponent should assign the responsibility of overseeing the implementation of the whole EMP on the ground during the life-cycle of the project to a designated person, referred to in this EMP as the Environmental Control Officer (ECO). The Proponent may decide to assign this role to one person for each project phase or may assign separate individual ECOs to oversee EMP implementation during each phase. The ECOs will have the following responsibilities:

- Management and facilitation of communication between the Proponent, PR and Interested and Affected Parties (I&APs) with regard to this EMP;
- Conducting site inspections (recommended minimum frequency is bi-annually) of all areas with respect to the implementation of this EMP (monitor and audit the implementation of the EMP);
- Advising the PR on the removal of person(s) and/or equipment not complying with the provisions of this EMP;
- Making recommendations to the PR 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.

3 ENVIRONMENTAL MANAGEMENT PLAN ACTIONS

3.1 Key Potential environmental impacts to be managed

The following key potential impacts have been identified per project phase and are summarised in **Table 3-1** below.

Table 3-1: Summary of key potential environmental impacts per project phase

	Project Phase	Potential impacts identified in the EA
1	Operation	Health and safety, soil, surface and groundwater contamination, wildlife disturbance, dust, noise, environmental degradation, habitat destruction, waste generation, erosion, archaeological and social impacts.
2	Decommissioning	Health and safety, soil, surface and groundwater contamination, wildlife disturbance, dust, noise, environmental degradation, erosion, archaeological and social impacts.

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

Management actions recommended to manage the potential impacts outlined above are presented in the following tables. The management actions were compiled based on the two project phases:

- Operation and maintenance phase management actions (during operation of the facility) (**Table 3-2**).
- Decommissioning phase (**Table 3-3**)

The responsible persons at NWR should assess these commitments in detail and should acknowledge their commitment to the specific management actions detailed in the table of the next subchapters.

3.2 Phase 1: Operational Phase Management Actions

The management actions for the operational phase during which the facility is operational will take place are listed in **Table 3-2**.

Table 3-2: Operation phase management actions

Environmental Feature	Impact	Management Actions
EMP training	Lack of EMP awareness and the implications thereof	• Employees appointed for work (construction, maintenance etc.) must ensure that all personnel are aware of necessary health, safety, and environmental considerations applicable to their respective work.
Monitoring	EMP non-compliance	• The ECO or the Proponent/Proponents Representative should monitor the implementation of this EMP. • The Proponents Representative should inspect the site at least on a monthly basis. • Bi-annual audits should be conducted of site activities by an external ECO.
Waste Management	Visual impact and soil contamination	• The site should always be kept tidy. • All domestic and general waste produced daily should be disposed of correctly. • No waste may be buried or burned. • Waste containers (bins) should be emptied regularly and removed from site to the nearest municipal waste disposal site. • All recyclable waste needs to be taken to the nearest recycling depot. Records of collection should be kept. • Adequate separate waste containers (bins) for hazardous and domestic / general waste must be provided on site. • Staff should be sensitised to dispose of waste in a responsible manner and not to litter. • Waste should be disposed of in accordance with the National Strategy on waste management in protected areas as developed by MEFT. • Waste from angling activities (e.g. offal, unused bait, bottles) should not be left on the beach. • Visitors to the site must sensitised to practice the principle of 'take in – take out'. • The proponent must monitor to ensure that visitors remove waste from the beaches when leaving.

Environmental Feature	Impact	Management Actions
		• Encourage and implement the 3-R principles of waste Reduction, Re-use and Recycling where possible.
Soil	Soil contamination	• Spill control preventative measures should be put in place to manage soil contamination such as the following: o Establish a complete inventory of hazardous materials (chemicals, oils, paints and fuels etc.) stored onsite such that in the event of a spill, information is available on volumes present. o Maintain copies of Material Safety Data Sheets (MSDS) for all hazardous materials kept on-site to ensure that in the event of a spill information is available on potential risks, both to nearby receptors and the workers on site. o Ensure the appropriate storage and handling requirements are in place at site o Undertake regular inspections of equipment and facilities to check for leaks or faulty equipment. • Potential contaminants should be contained on site and disposed of in accordance with municipal wastewater discharge standards so that they do not contaminate surrounding soils. • Soil contamination should be monitored on site daily by PR and monthly by ECO. • Visual soil assessment for signs of contamination at parking and activity areas. • Place oil drip trays under parked vehicles and at the site.
Hazardous Waste	Soil and groundwater contamination	• A sufficient number of separate waste containers (bins) for hazardous and domestic / general waste must be provided on site. • Hazardous waste should be disposed of at a facility that is able to receive such waste. The nearest Hazardous Waste Facility is located in Walvis Bay. • Maintenance and washing of vehicles and machinery on site should take place only at a designated workshop area.

Environmental Feature	Impact	Management Actions
Biodiversity	Loss of Biodiversity	• Trees and plants protected under the Forest Act No 12 of 2001 are not to be removed without a valid permit from the local Department of Forestry. • Off-road driving (by vehicle or quad bike) should not be allowed on site. • No alien vegetation should be introduced on site.
Noise	Disturbance to fauna	• Noise restrictions should be in place on site to minimise disturbance.
Health and Safety	Health and Safety on site	• Ensure first aid training and environmental awareness training is provided to staff. • Fire extinguisher training should be provided to a designated member of staff who will act as a fire marshal during fire events. • Any accidents/incidents occurring on site should be reported to MEFT and other relevant authority within 24 hours.
Employment	Recruitment	• Local employment and use of local businesses/suppliers should be encouraged to promote and improve the local economy as far as reassembly possible. • Should the required services and/or goods not be available locally then look to other localities for these services/goods.
Ablution	Health and safety	• Functioning toilets should be available on site. • Separate ablutions should be available for men and women and should clearly be indicated as such. • Sewage waste needs to be removed on a regular basis to the nearest approved sewage disposal site. • Workers responsible for cleaning the toilets should be provided with latex gloves and masks.

Environmental Feature	Impact	Management Actions
Water Management	Water saving Groundwater contamination	• Water saving mechanisms should be implemented on site e.g., installation of water saving devices where practical. • Promote water saving within the facility. • Should any hazardous material and wastes be produced these shall be managed in a safe and responsible manner so as to prevent contamination of soils, pollution of water and/or harm to people or animals as a result of the use of these materials. • Hazardous and non-hazardous waste shall be stored and disposed of separately at all times.
Water	Surface and groundwater contamination	• Ensure that surface run-off 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.
Archaeology	Archaeological Impacts	• Existing heritage or archaeological sites may not be disturbed by the operations at the facility. • These should be demarcated to limit access to the sites. • Should a heritage site or archaeological site be uncovered or discovered on site, a "chance find" procedure should be applied in the order they appear below: o If operating machinery or equipment, stop work; o Demarcate the site with danger tape; o Determine GPS position if possible; o Report findings to the construction foreman; o Report findings, site location and actions taken to superintendent; o Cease any works in immediate vicinity; o Visit site and determine whether work can proceed without damage to findings; o Determine and demarcate exclusion boundary; o Site location and details to be added to the project's Geographic Information System (GIS) for field confirmation by archaeologist;

Environmental Feature	Impact	Management Actions
		○ Inspect site and confirm addition to project GIS; ○ Advise the National Heritage Council of Namibia (NHCN) and request written permission to remove findings from work area; and ○ Recovery, packaging, and labelling of findings for transfer to National Museum.
Traffic	Traffic Impacts	• Introduce speed limits and signage within the facility. • Roads to be clearly demarcated. • No off-road driving to be permitted on site.
Fuel depot and fire safety	Injury or loss of life Damage to infrastructure Damage to surrounding environment	• The facility must have a fire emergency plan available on site, which should address as a minimum the provisions included in the Consumer Installation Guideline Document. Some of the provisions to be addressed are summarised here: ○ Detailed fire emergency procedure (i.e. exact steps to be followed in the event of a fire emergency). ○ Display of appropriate warning signage. ○ Training of employees. ○ Appropriate fire safety signage should be clearly visible around the fuel depot. • Fire-extinguishing equipment should be compliant with the applicable SANS (or as required by the conditions attached to the Consumer Installation Certificate). • All personnel utilising the fuel depot should receive the appropriate training in accordance with their respective roles and responsibilities. This training should include as a minimum the following: ○ Location and proper use of firefighting equipment. ○ Proper conduct generally when handling hydrocarbons within the facility (no smoking, prohibited use of cell phones etc.). ○ Emergency procedures (fire drills, spill control etc.).

3.3 Phase 2: Rehabilitation and Decommissioning Management Actions

The facility is expected to be permanent and is not expected to be decommissioned, however the impacts related to decommissioning has been assessed. The table below (**Table 3-3)** presents the management action for decommissioning phase, should the facility be decommissioned.

Table 3-3: Decommissioning phase management actions

Environmental Feature	Impact	Management Actions
Employment	Loss of employment	• The Proponent should inform the employees, of its intentions to close the facility, and the expected date of such. • The Proponent should raise awareness of the possibilities for work within the tourism sector.
Rehabilitation	Soil and Groundwater contamination	• An inspection of the soil and groundwater contamination must be undertaken to determine the presence, nature, and extent of contamination on site. • This will guide the level and kind of remediation to be undertaken on site. • Prior to the infrastructure being destroyed, all residue products must be carefully removed for recycling or safe disposal. • Solid materials must be used for filling. Only clean soil should be used for filling purposes.
Waste Management	Pollution	• Contaminated soil must be removed from site and disposed at a facility that is able to receive such waste. • No waste may remain on site after the closure of the facility. • Waste must be disposed of at an approved waste facility.

3.4 Recommendations for Monitoring

In order to prevent and minimize the above-mentioned environmental impacts, the following site monitoring measures need to be done:

- Monitor whether provisions as set out in the EMP has been complied with.
- Non-compliance is to be recorded and discussed at weekly site meetings and timeous remedial actions taken.
- Monitoring feedback is to be recorded using the attached checklist (**Appendix B**).

4 CONCLUSIONS

Based on the recommendation given in this EMP, GCS is confident that the activities, as described in **Chapter 1** of the EMP may be granted an Environmental Clearance Certificate, provided that the EMP is implemented and that all the legal requirements pertaining to this development are complied with.

APPENDIX A: CV OF EAP