

Submitted to: Three Musketeers Investment (Pty) Ltd
Attention: Mr Andre Neethling
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REPORT:

ENVIRONMENTAL CLEARANCE APPLICATION FOR A COMBINED AMENDMENT AND RENEWAL FOR THE !URIS AND BOBOS IRRIGATION SCHEME ON FARM URIS 481 AND BOBOS 544, OSHIKOTO REGION, NAMIBIA

PROJECT NUMBER: ECC-80-373-REP-03-D

REPORT VERSION: REV 01

DATE: MAY 2022

Environmental clearance application for a combined amendment and renewal for the !Uris and Bobos irrigation scheme on farm Uris 481 and Bobos 544, Oshikoto Region, Namibia

Three Musketeers Investment (Pty) Ltd

TITLE AND APPROVAL PAGE

Project Name: Environmental clearance application for a combined amendment and renewal for the !Uris and Bobos irrigation scheme on farm Uris 481 and Bobos 544, Oshikoto Region, Namibia

Client Company Name: Three Musketeers Investment (Pty) Ltd

Client Name: Mr Andre Neethling

Ministry Reference: APP- 003390

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Status of Report: Final submitted to MEFT

Project Number: ECC-80-373-REP-03-D

Date of issue: May 2022

Review Period N/A

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– Executive Summary

Environmental Compliance Consultancy (ECC) has been engaged by Three Musketeers Investment (Pty) Ltd, the Proponent, to act on their behalf for the application to amend and renew their existing environmental clearance certificate for the !Uris and Bobos irrigation scheme.

The current Project is on Farm Uris 481, adjacent to the Tschudi Copper Mine, west of Tsumeb. The owners of Farm Uris and the Tschudi Copper Mine have signed an agreement to use the excess water within the Tschudi mine pit, as part of their “land use agreement”. The settlement agreement was concluded between the two parties in November 2014 and eventually sanctioned by the High Court of Namibia. Water will be sourced from the mine once the mine resumes operations.

There are new proposed stakeholders that want to join the irrigation scheme with their farms near farm Uris. The joint investment Project will be known as Nam – Citco and the irrigation scheme will solely focus on the production and sale of citrus varieties for export purposes. The area size under irrigation will remain the same as approved under the current ECC. However, the Project evolved materially into four equal 125 ha portions on 4 separate individually owned farms, rather than a consolidated 500 ha area on one farm only.

This amendment includes three of the four farms considered to merge for the Nam-Citco Project, of which two portions fall on farm Uris 481 and one portion lies to the south on farm Bobos 544, as seen in Figure 1. This suggests that the amendment will only include a 375-ha area irrigation scheme.

The environmental assessment that was undertaken for the proposed Project followed ECC’s EIA Methodology to identify potential significant effects that may occur because of the proposed Project. Through the scoping process, the only risk to the environment deemed significant was the potential for soil quality to be affected; all other social and environmental receptors were scoped out, as it was unlikely that there would be significant impacts on those features.

Through further analysis and identification of mitigation and management methods, the assessment concludes that the likely significance of effects on soil quality is expected to be minor. Various best practices and mitigation measures have been identified to avoid and reduce effects as far as reasonably practicable, as well as ensure the environment is protected and unforeseen effects are avoided.

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– DEFINITIONS AND ABBREVIATIONS

ABBREVIATION	DESCRIPTION
DEA	Directorate of Environmental Affairs
ECC	Environmental Compliance Consultancy
EIA	Environmental Impact Assessment
EMA	Environmental Management Act
EMP	Environmental Management Plan
ESIA	Environmental Social Impact Assessment
ha	Hectare
I&APs	Interested and Affected Parties
IFC	International Finance Corporation
Km	Kilometre
MAWLR	Ministry of Agriculture, Water, and Land Reform
MEFT	Ministry of Environment Forestry and Tourism
NDP5	Fifth National Development Plan

1 INTRODUCTION

1.1 PROJECT OVERVIEW

Environmental Compliance Consultancy (ECC) has been engaged by Three Musketeers Investment (Pty) Ltd, the Proponent, to act on their behalf for the application to amend and renew their existing environmental clearance certificate for the !Uris and Bobos irrigation scheme.

The current Project location is on farm Uris 481, adjacent to the Tschudi Copper Mine, west of Tsumeb. The owners of Farm Uris and the Tschudi Copper Mine have a signed agreement to use the excess water within the Tschudi mine pit, as part of their "land use agreement". The agreement was concluded between the two parties in November 2014 and eventually sanctioned by the High Court of Namibia. Water will be sourced from the mine once the mine resumes operations.

An ECC has been obtained for the irrigation scheme in July 2019 and is valid until July 2022 (Appendix B). Farm Uris is located approximately 23km west of Tsumeb, as seen in Figure 1

1.2 AMENDMENT APPLICATION SCOPE

Environmental Compliance Consultancy was engaged by Three Musketeers Investment (Pty) Ltd to compile an environmental scoping report plus impact assessment (referred to as an ESIA herein) for the amendment and renewal of the !Uris and Bobos irrigation schemes environmental clearance certificate. The aim of which is to divide the current 500ha Project area located on farm Uris into four equal 125 ha portions on separate farms. Each portion will be established on four individually owned farms surrounding Uris. However, the current amendment only covers three of the four farms. The fourth farm is reserved as a future site and the owner of that specific farm will be responsible to conduct a separate ESIA once that portion intends to be consolidated with the rest. The joint investment Project will be known as Nam – Citco.

ECC has undertaken a revision of the proposed Project and has considered the potential effects on the environment, society the implementation of industry best practice mitigation measures and has determined that this Project could be assessed by means of an amendment and relevant impact assessment, by following Section 39 of the Environmental Management Act (EMA), No. 7 of 2007.

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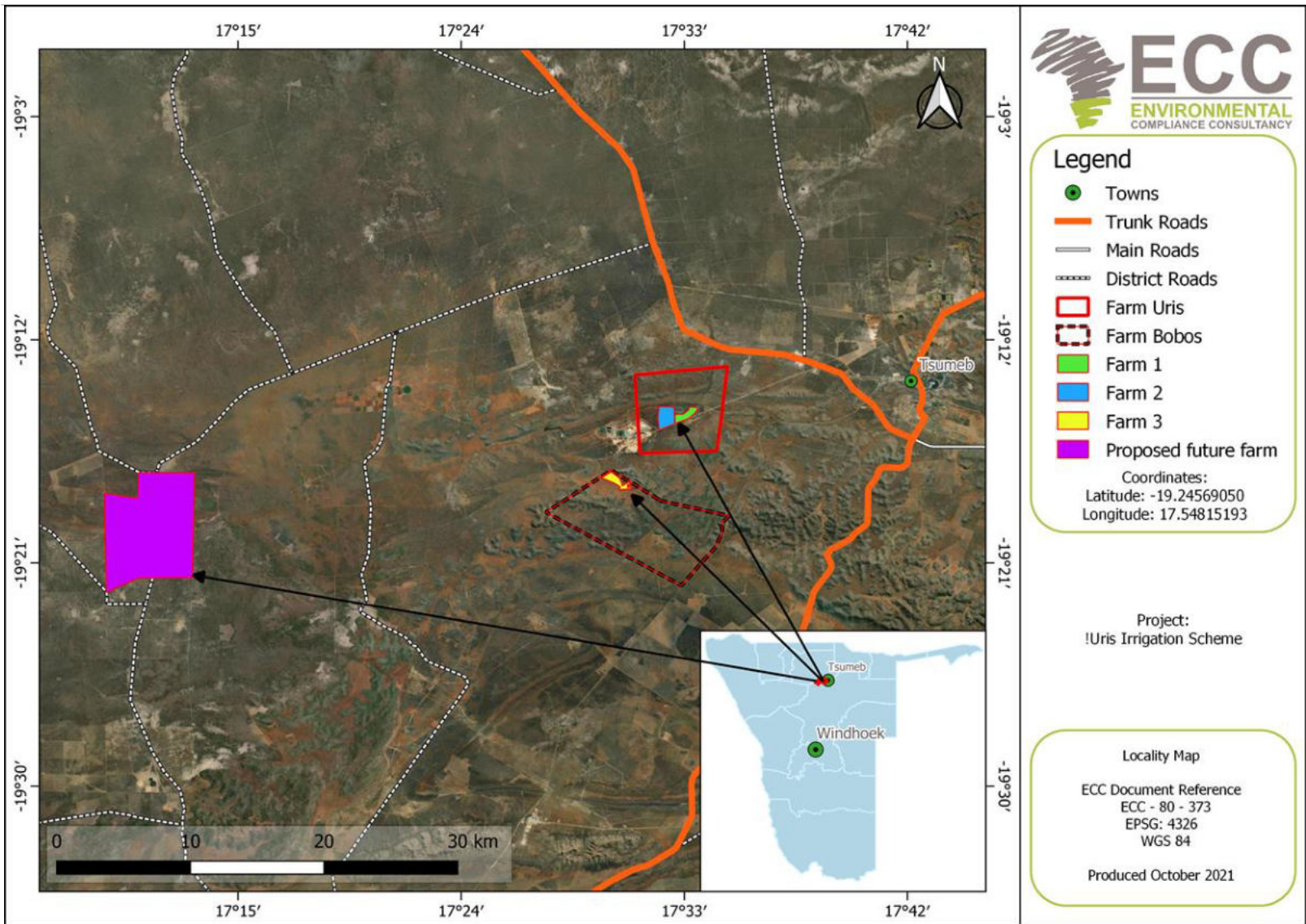


Figure 1 - Satellite image indicating the location of the farms and farm portions

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!Uris and Bobos irrigation scheme on farm Uris 481 and Bobos 544, Oshikoto Region,
Namibia**

Three Musketeers Investment (Pty) Ltd

1.3 PROPONENT DETAILS

Table 1 - Proponent details

Contact	Postal address	Email address	Telephone
Three Musketeers Investment (Pty) Ltd Mr. Andre Neethling	P O Box 1321 Tsumeb Namibia	baasco@afol.com.na	+264811228502

1.4 ENVIRONMENTAL COMPLIANCE CONSULTANCY

Environmental Compliance Consultancy (ECC), a Namibian consultancy (registration number Close Corporation 2013/11401), has prepared this report and impact assessment on behalf of the proponent. ECC operates exclusively in the environmental, social, health and safety fields for clients across Southern Africa, in both the public and private sectors. ECC is independent of the proponent and has no vested or financial interest in the proposed Project, except for fair remuneration for professional services rendered.

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2 APPROACH TO THE IMPACT ASSESSMENT

2.1 PURPOSE AND SCOPE OF THE ASSESSMENT

This assessment aims to determine which impacts are likely to be significant (the focus of the assessment); scope the available data and any gaps which need to be filled; determine the spatial and temporal scope and identify the assessment methodology.

Scoping of the ESIA was undertaken by the EIA team. The scope of the assessment was determined through undertaking a preliminary assessment of the proposed Project against the receiving environment obtained through a desktop review, available site-specific literature, monitoring data and site reports.

2.2 THE ASSESSMENT PROCESS

The EIA methodology applied to this EIA has been developed using the International Finance Corporation (IFC) standards and models, in particular, Performance Standard 1; 'Assessment and management of environmental and social risks and impacts' (International Finance Corporation, 2017) (International Finance Corporation, 2012), which establishes the importance of:

- Integrated assessment to identify the environmental and social impacts, risks, and opportunities of Projects;
- Effective community engagement through disclosure of Project-related information and consultation with local communities on matters that directly affect them; and
- The client's management of environmental and social performance throughout the life of the Project.

Furthermore, the Namibian Draft Procedures and Guidance for ESIA and EMP (Republic of Namibia, 2008) as well as the international and national best practice; and over 25 years of combined EIA experience, were also drawn upon in the assessment process.

This impact assessment is a formal process in which the potential effects of the Project on the biophysical, social and economic environments are identified, assessed and reported so that the significance of potential impacts can be taken into account when considering whether to grant approval, consent or support for the Project

Final mitigation measures and recommendations are based on the cumulative experience of the consulting team and the client, taking into consideration the potential environmental and social impacts. The process followed through the basic assessment is illustrated in Figure 2 and detailed further in the following sections.

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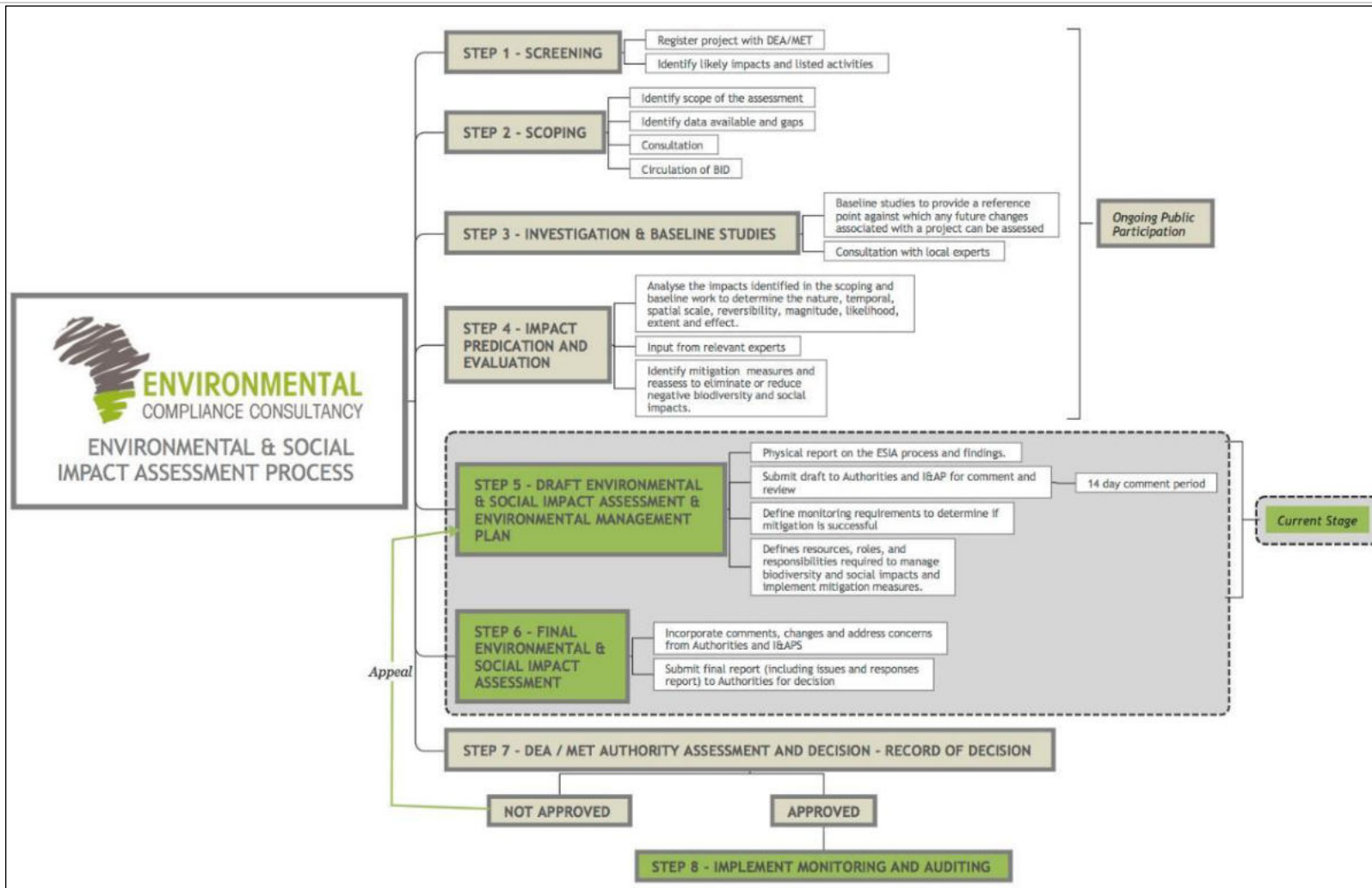


Figure 2 – ECC ESIA method

2.2.1 Step 1 - Screening of the Project

STATUS: COMPLETE

The first stage in the EIA process is to undertake a screening exercise to determine whether the changes to the Project trigger any new or additional listed activity under the Environmental Management Act, No. 7 of 2007, its associated regulations and if any potentially significant impacts could arise from the Project changes, that they are assessed. The location, scale and duration of Project activities will be considered against the receiving environment.

The screening phase of the Project is a preliminary analysis to determine ways in which the Project may interact with the biophysical, social and economic environment. Impacts that are identified as potentially significant during the screening and scoping phase are taken forward for further assessment in the EIA process. The details and outcomes of the screening process are discussed further in Sections 6 and 7.

2.2.2 Step 2 - Scoping

STATUS: COMPLETE

Where an EIA is required, the second stage is to scope the assessment. The main aims of this stage are to determine which impacts are likely to be significant (the focus of the assessment); scope the available data and any gaps which need to be filled; determine the spatial and temporal scope and identify the assessment methodology.

In response to the request from the Proponent and in terms of the Environmental Management Act of 2007, an application for an amendment to the irrigation Project's current and approved environmental clearance certificate is to be applied for by means of a combined amendment and renewal application (this report) which contains an assessment of impacts.

Subsequently, the scoping of the EIA was undertaken by the EIA team from ECC. The scope of the assessment was determined through undertaking a preliminary assessment of the proposed Project against the receiving environment obtained through a high-level desktop review. Feedback from consultation with the client and stakeholders also informed this process.

An assessment of potentially significant impacts or risks associated with the proposed amendment has been included in Chapter 7 in this report, whilst non-significant impacts are identified only.

2.2.3 Study area

This ESIA study area has been defined according to the geographic scope of the receiving environment and potential impacts that could arise as a result of the proposed Project. The study area covers the farm portions, where new irrigation areas are proposed (Figure 3).

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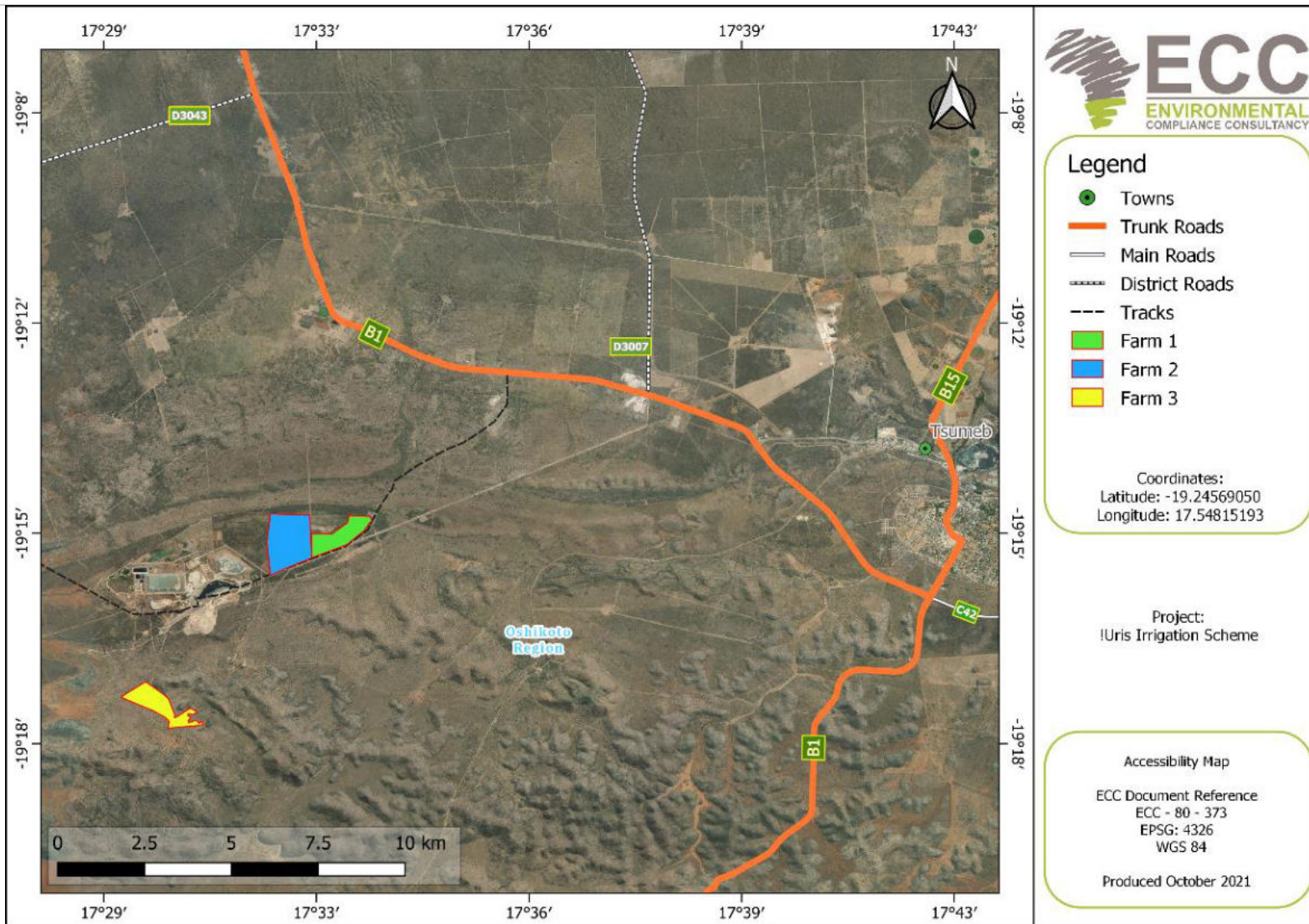


Figure 3 - Study area of the proposed Project indicating the proposed farm portions

2.2.4 Consultation

STATUS: COMPLETE

Public participation and consultation are requirements stipulated in Section 21 of the Environmental Management Act, No.7 of 2007 and associated regulations for a Project that needs an environmental clearance certificate. Consultation is a compulsory and critical component in the EIA process in achieving transparent decision-making and can provide many benefits.

The objectives of the stakeholder engagement process are to:

- Provide information on the Project, introduce the overall concept and plan;
- Clarify responsibility and regulating authorities;
- Listen and understand community issues, concerns and questions;
- Explain the process of the EIA and timeframes; and
- Establish a platform for ongoing consultation.

2.2.5 Step 3 – Baseline studies

STATUS: COMPLETE

A robust baseline is required to provide a reference point against which any future changes associated with a Project can be assessed and allow suitable mitigation and monitoring to be identified. The site has been studied in a previous EIA. Section 5 describes the environmental and social baseline for the proposed amendment.

2.2.6 Step 4 – Impact identification and evaluation

STATUS: COMPLETE

The key stage of the EIA process is the impact identification and evaluation stage. This stage is the process of bringing together Project characteristics with the baseline environmental characteristics and ensuring all potentially significant environmental and social impacts are identified and assessed. It is an iterative process that commences from Project inception to the final design and Project implementation. The impact identification and evaluation stage were undertaken in November 2021.

The final design of the proposed Project has been assessed, as well as alternatives considered during the design process by following the Environmental Management Act, No.7 of 2007. Refer

to Chapter 6 that sets out the assessment methodology used to assess the Project against the environmental and social baseline and Chapter 7 for the findings of the assessment.

2.2.7 Step 5 – Final environmental impact assessment report and environmental management plan

STATUS: COMPLETE

The final ESIA report and associated appendices will be available to all stakeholders on the ECC website www.eccenvironmental.com.

The EIA report and appendices will be formally submitted to the Office of the Environmental Commissioner, DEA as part of the application to amend and renew the current environmental clearance certificate.

2.2.8 Step 6 – Authority assessment and decision making

STATUS: FUTURE STAGE

The Environmental Commissioner in consultation with other relevant authorities will assess if the findings of the amended ESIA presented in the ESIA report are acceptable. If deemed acceptable, the Environmental Commissioner will revert to the Proponent with a record of decision and any recommendations.

2.2.9 Step 7 - Monitoring and auditing

STATUS: FUTURE STAGE

In addition to the EMP being implemented by the Proponent, a monitoring strategy and audit procedure will be determined by the Proponent and competent authority. This will ensure key environmental receptors are monitored over time to establish any significant changes from the baseline environmental conditions caused by Project activities.

3 REGULATORY FRAMEWORK

Environmental clearance is required for any activity listed as per Government Notice No 29 of 2012 of the EMA. The Proponent holds the environmental clearance certificates for the Project that comprises the relevant listed activities as detailed in the regulations.

A thorough review of relevant legal legislation has been conducted and the table below identifies relevant legal requirements specific to the Project. This chapter outlines the regulatory framework applicable to the proposed Project.

3.1 CURRENT PROJECT APPROVALS

- The site is fully permitted in terms of the Minerals Act, No. 33 of 1992 (agreement with Tsudi Copper mine), the Environmental Management Act, No. 7 of 2007 and the Water Resource Act, Act 54 of 1956.
- The site operates by following its current and approved environmental clearance certificates issued in terms of the Environmental Management Act, No. 7 of 2007 by the Ministry Environment, Forestry and Tourism.
- The site remains compliant with all Namibian laws and policies and relevant permits or approval are available upon request.

3.2 ENVIRONMENTAL REQUIREMENTS

The Environmental Management Act, No. 7 of 2007 stipulates that an environmental clearance certificate is required to undertake listed activities in terms of the Act and its regulations. Listed activities in the Act triggered by the proposed Project are as follows (Table 2 - Listed activities triggered by the Project):

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Table 2 - Listed activities triggered by the Project

Listed activity	ESIA screening finding
<p>FOREST ACTIVITY (4.) The clearance of forest areas, deforestation, afforestation, timber harvesting or any other related activity that requires authorization in terms of the Forest Act, 2001 (Act No. 12 of 2001) or any other law.</p>	<p>This is an irrigation Project where land will be cleared to plant various citrus varieties.</p>
<p>AGRICULTURE AND AQUACULTURE ACTIVITIES (7.5) Pest control.</p>	<p>Pesticides are planned to be used for irrigation purposes.</p>
<p>WATER RESOURCE DEVELOPMENTS (8.1) The abstraction of ground or surface water for industrial or commercial purposes; (8.7) Irrigation schemes for agriculture excluding domestic irrigation.</p>	<p>Water will be abstracted from historic and new boreholes. If the Tschudi copper mine resumes production, water will also be sourced from the mine (through dewatering) for irrigation purposes. Water will be pumped via the proposed pipelines to irrigation schemes on the three farm portions.</p>

3.3 NATIONAL REGULATORY REGIME

Table 3 - Legal compliance

National regulatory regime	Summary	Applicability to the Project
Namibian Constitution First Amendment Act 34 of 1998	<p>The Constitution of the Republic of Namibia, 1990 clearly defines the Country's position in relation to sustainable development and environmental management. The Constitution refers that the State shall actively promote and maintain the welfare of the people by adopting policies aimed at the following:</p> <p><i>"Maintenance of ecosystems, essential ecological processes and biological diversity of Namibia and utilization of living natural resources on a sustainable basis for the benefit of all Namibians, both present, and future; in particular, the Government shall provide measures against the dumping or recycling of foreign nuclear and toxic waste on Namibian territory."</i></p>	<p>The Project has considered this during the design phase. The proposed amendment shall provide local jobs as well as Namibian grown produce, thereby supporting the local economy in various ways.</p>
Environmental Management Act, 2007 (Act No. 7 of 2007) and associated regulations, including the Environmental	<p>The Act aims to promote sustainable management of the environment and the use of natural resources by establishing principles for decision-making on matters affecting the environment.</p> <p>It sets the principles of environmental management as well as the functions and powers of the Minister. The Act requires certain activities to obtain an environmental clearance certificate prior to Project development. The Act</p>	<p>This environmental scoping report (and EMP) documents the findings of the environmental assessment undertaken for the proposed Project, which will form part of the environmental clearance application. The assessment and report have been undertaken in line with the requirements under the Act and associated regulations.</p>

National regulatory regime	Summary	Applicability to the Project
Impact Assessment Regulation, 2007 (No. 30 of 2011)	states an EIA may be undertaken and submitted as part of the environmental clearance certificate application. The MEFT is responsible for the protection and management of Namibia's natural environment. The Department of Environmental Affairs under the MEFT is responsible for the administration of the EIA process.	
Water Act, No 54 of 1956 Water Resources Management Act, 2004 Water Resources Management Act 2013	This Act provides for the control, conservation and use of water for domestic, agricultural, urban and industrial purposes; to make provision for the control, in certain respects, of the use of seawater for certain purposes; and for the control of certain activities on or in water in certain areas. The MAWLR Department of Water Affairs is responsible for the administration of the Water Act.	The Act stipulates obligations to prevent pollution of water. The EMP sets out measures to avoid polluting the water environment. Whilst the 2013 Act is not enforced, it is best practice to adhere to the stipulations. A licence to abstract and use water has been applied for and is held by the Mine. If required, the Proponent will apply for a secondary permit and shall operate by following any conditions in the licence.
The Fertilizers, Farm Feeds, Agricultural Remedies and Stock Remedies Act (Act 36 of 1947) and amendments	Provides for the registration of fertilizers, farm feeds, agricultural remedies and stock remedies; regulates or prohibits the importation, sale, acquisition, disposal or use of fertilizers, farm feeds, agricultural remedies and stock remedies; to provide for the designation of technical advisers and analysts, and to provide for matters incidental thereto. All chemical products (including weed killers) used in Namibia are obliged to be registered with the Registrar of this Act. The Act makes it possible to prohibit the use or import of any remedy that could be an environmental risk.	Fertilisers or pesticides may be used for the proposed Nam-Citco Project. The storage, use and application of fertilisers and/or pesticides shall be compliant with the Act as well as best practice – all set out in the EMP.

National regulatory regime	Summary	Applicability to the Project
Forest Act 12 of 2001 Forest Act Regulations 2015	To provide for the protection of the environment and the control and management of the forest. The regulations have the following stipulations that may be relevant to the proposed Project: <ul style="list-style-type: none"> - A harvesting Licence is required to harvest forest produce. - 9(1) a holder of a licence for the removal of forest produce must report on the species and the actual quantity of the forest produce removed when submitting the next licence application or at the end of the financial year in the form of Form 20 of Annexure 1. - Tree species and any vegetation within 100m from a watercourse may not be removed without a permit. - Provision for the protection of various plant species. This includes the proclamation of protected species of plants and the conditions under which these plants can be disturbed, conserved, or cultivated. 	There might be some vegetation removal as part of the proposed amendment. The Proponent shall undertake all activities in line with the conditions stipulated in the Permit and a valid permit shall be obtained throughout vegetation clearance activities.
National Heritage Act, No. 27 of 2004	The Act provides the provision of the protection and conservation of places and objects with heritage significance.	There is potential for heritage objects to be found on the site, therefore the stipulations in the Act have been taken into consideration and are incorporated into the EMP.
Nature Conservation Ordinance Act No. 4 of 1975 and its regulations	"The Act makes provision for the conservation and management of wildlife and regulates fishing in inland waters. The text consists of 91 sections divided into 7 Chapters and completed by 9 Schedules. The Chapters are the following: Preliminary (I); Game Parks and Nature Reserves (II); Wild animals (III); problem animals (IV); Fish in	Conservation of animals and the ecosystem should be promoted during the lifetime of the Nam-Citco Project.

National regulatory regime	Summary	Applicability to the Project
	inland waters (V); Indigenous plants (VI); general (VII). The Nature Conservation Board shall be continued under section 3. The Cabinet may appoint Nature Conservator”.	
Labour Act, No. 11 of 2007: Regulations relating to the Health and Safety of Employees at Work (GN 156/1997)	The Act provides for the regulation of employees’ health and safety in the workplace.	The proposed Project will comply with stringent health and safety policies, including the compulsory use of specific PPE in designated areas to ensure adequate protection against health and safety risks. Proper storage and labelling of hazardous substances are required. The Project will ensure employees in charge of and working with hazardous substances need to be aware of the specific hazardous substances in order not to compromise worker and environmental safety.
Hazardous Substances Ordinance Ordinance No. 14 of 1974	The Act provides for the control of substances that may cause injury or ill-health to or death of human beings because of their toxic, corrosive, irritant, strongly sensitizing or flammable nature or the generation of pressure thereby in certain circumstances.	Potential use of pesticides that could be harmful to human health, safety and well-being.
Minerals (Prospecting and Mining) Act 33 of 1992 sections 50 and 52	The Act provides for the granting of various licences related to mining and exploration. Section 50 (i) requires: “An environmental assessment indicating the extent of any pollution of the environment before any prospecting operations or mining operations are being carried out, and an estimate of any pollution, if any,	The owners of Farm Uris and the Tschudi Copper Mine have secured the joint opportunity to use the excess water, as part of the “land use agreement”, in terms of the Namibian Minerals (Prospecting and Mining) Act Number 33 of 1992 between the Mining Licence holder and the Landowner. The settlement agreement was concluded between the two parties in November 2014 and eventually sanctioned by the High Court of Namibia.

National regulatory regime	Summary	Applicability to the Project
	<p>likely to be caused by such prospecting operations or mining operations.</p> <p>"The act sets out the requirements associated with licence terms and conditions, such that the holder of a mineral licence shall comply with.</p> <p>The act also contains relevant provisions for pollution control related to mining activities and land access agreements and provides provisions that mineral licence holders are liable for any damage to land, water, plant, or animal life, caused by spilling or pollution, and must take all such steps as may be necessary to remedy such spilling, pollution, loss, or damage, at its own costs.</p>	
Soil Conservation, 1969 (Act 76 of 1969) and the Soil Conservation Amendment Act (Act 38 of 1971)	<p>Makes provision for the prevention and control of soil erosion and the protection, improvement and the conservation, improvement and manner of use of the soil and vegetation.</p>	<p>Through vegetation removal, there may be the risk of affecting soil quality. Measures shall be taken to avoid this which are set out in the EMP.</p>

Table 4 - National policies

National regulatory regime	Summary	Applicability to the Project
Vision 2030	<p>Vision 2030 sets out the nation's development programmes and strategies to achieve its national objectives. It sets out eight themes to realise the country's long-term vision.</p> <p>Vision 2030 states that the overall goal of the vision is to improve the quality of life of the Namibian people to a level in line with the developed world.</p>	<p>The planned Project shall aim to meet the objectives of Vision 2030 and shall contribute to the overall development of the country through continued employment opportunities.</p>
Fifth National Development Plan (NDP5)	<p>The NDP5 is the fifth in the series of seven five-year national development plans that outline the objectives and aspirations of Namibia's long-term vision as expressed in Vision 2030. The NDP5 is structured on five pillars: economic progression, social transformation, environmental sustainability and good governance. Under the social transformation pillar is the goal of improved education.</p>	<p>The planned Project supports meeting the objectives of the NDP5 through creating opportunities for continued employment opportunities and economic progression.</p>
Draft Pollution Control; and Waste Management Bill (1999)	<p>The Bill amalgamates a variety of legislative frameworks in Namibia, regulating pollution in different sectors of the economy.</p>	<p>Although not enacted, the Bill has been applied to the ESIA to ensure any activities potentially giving rise to pollution are minimized as far as reasonably practicable and obligations are adhered to.</p>

National regulatory regime	Summary	Applicability to the Project
	The Bill promotes sustainable development, to provide for the prevention and regulation of the discharges of pollution.	

Environmental clearance application for a combined amendment and renewal for the !Uris and Bobos irrigation scheme on farm Uris 481 and Bobos 544, Oshikoto Region, Namibia

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3.4 PERMITS AND LICENCES

Several permits must be in place for the Project to be legally compliant and able to operate Project. A list of such licences is contained in Table 5.

Table 5 - Project-related permit requirements

Permit and licences	Relevant authority	Project bearing
Water abstraction permits	Ministry of Agriculture, Water and Land Reform	An abstraction permit is required for the abstraction of water from a borehole for irrigation purposes.
Permits for the removal of vegetation	Ministry of Environment, Forestry and Tourism	Permits will need to be obtained in the event where protected tree species need to be removed or large tracts of land above 15 ha need to be cleared.

4 PROJECT DESCRIPTION AND PROPOSED PROJECT CHANGES

4.1 NEED FOR THE PROJECT

The fifth National Development Policy (NDP5) lists five game-changers that aim to move Namibia from a reactive, input-based economy towards a proactive, high performing economy. One of these game-changers is 'increasing productivity in agriculture, especially for smallholder farmers. The agricultural sector contributes approximately 3.8% to the GDP. In 2015, Namibia imported about 76%, 98% and 91% of its demand for maize, millet and wheat respectively. Therefore, the productivity of small, medium and large-scale farms needs to be maximised to support the Namibian economy. In addition, local jobs shall be produced through the expansion of this Project. In 2014, the number one occupation was skilled agriculture in Namibia. This has dropped to the fourth position according to the labour force survey 2016 (NSA 2017).

With the lack of rainfall, a limiting factor for agriculture in Namibia is water. Irrigation is essential to facilitate the growth of crops on a commercial scale. Irrigation water is usually sourced from groundwater due to the lack of surface water sources, which can be costly. Therefore, through utilising clean water that is captured as a waste stream from mining activities for irrigation purposes, various costs can be saved, numerous economic and social benefits optimised and some of the aims of NDP5 satisfied.

The Nam-Citco Project is situated in a part of Namibia that is ideal for citrus production, due to the availability of water (especially due to the agreement with the Tschudi Copper mine) and, favourable climate and soil conditions. All citrus grown will be destined for export markets and will become part of a few other proposed future Projects (i.e., marketing packaging etc.). This part of Namibia is expected to produce high citrus fruit yields much earlier than other citrus-producing countries. Varieties such as lemons, grapefruit, soft citrus, navels and valencia's are planned to be planted as part of the Nam-Citco product range based on the continued global demand for these citrus varieties. Nam-Citco intends to become an internationally recognized citrus grower in Namibia.

"The goal of Nam - Citco is to become an internationally recognized citrus player over a period of 3 – 7 years, through instituting a robust corporate governance framework, growing cultivars that are both suited to local growing conditions and international demand, internal control measures and building a strong brand. Nam - Citco's will focus on innovation and delivering superior customer service and building strong relationships with its communities and stakeholders." (CenseoCapital 2021).

4.2 PROCEDURES AND PLANNING

The Proponent shall ensure that all required permits from the various ministries, local authorities and any other bodies that govern the construction and operation activities are obtained and remain valid throughout the Project's development and operation. Ensure all business partners and employees enter into an agreement, which includes the need to adhere to the stipulations within the EMP. The most suitable procedures and methods shall be identified to ensure the impacts on the environment and society from these activities are minimised.

4.3 CURRENT OPERATIONS

The landowners are the Three Musketeers Properties (Pty) Ltd Company Number 2000/612 (farm portions 1 and 2) and Josef Ismael (farm portion 3).

The current operations include the operation of the irrigation scheme and agriculture Project. Operation activities include preparation of land; maintenance of pumps, lines and irrigation system; planting and harvesting of crops; application of fertilisers and pesticides; and transporting crops to markets.

On farm Uris, 80 hectares has been cleared (with permits in place for 100 ha) and 20 ha ripped and prepared. An irrigation system for the first 10.5 ha is also being installed, where 4998 Star Ruby pomelo trees are currently being planted. On farm Bobos, 80 ha of land is currently used for maize, pumpkins and citrus. The irrigation scheme currently gets its water from historic and new boreholes.

Approximately 6 million cubic metres of water per year (16800m³/day) to match the mine dewatering program is planned to be used to operate the irrigation scheme (once the Tschudi mine is back in operation). The installation, as discussed with the mine will consist of a surge tank on the surface at the point where water will be discharged into the canal. A water meter is required at the take-off point to record the exact volume of water abstracted. The surge tank will act as a collecting vessel to control the water flow in two directions:

- To Uris through pumps with a flooded suction created by the surge tank. The water will be pumped to the discharge points on farm Uris where it will be utilized for irrigation. The engineering and layout of the installation are standard and easily implemented. The surge tank is the point where the water transfer will take place.
- If no water is pumped by Uris the water in the surge tank will gravitate into the canal. When finally agreed the option of water gravitating to Uris will be considered.

Planting and harvesting are undertaken with standard farm equipment and vehicles. Once harvested, crops shall be transported via road in a suitable transport vehicle.

4.4 PROPOSED PROJECT CHANGES

There are new proposed stakeholders that want to join the irrigation scheme and have farms in proximity to the current irrigation scheme on farm Uris. The joint investment Project will be Known as Nam – Citco and the irrigation Project will solely focus on citrus varieties. The area under irrigation will remain the same as approved under the current ECC but will be divided into four equal 125 ha (Figure 1) portions on 4 separate individually owned farms. This amendment includes three of the four farms, of which two portions fall on farm Uris 481 and one portion lies to the south of farm Uris on farm Bobos 544 as seen in Figure 1. This suggests that the amendment will only include a 375-ha area irrigation scheme.

Three separate 6" PVC pipelines are proposed to be constructed/installed from the Tschudi Copper mine (water source) to irrigation points and storage dams of farm portions 1, 2 and 3. The pipelines will be buried underground and installed for the most part next to the road servitudes as seen in Figure 4.

Table 6 outlines the proposed 5-year strategy for each farm portion and how many hectares of “new orchard development” is planned per year to reach a total of 125 ha at year five.

Table 6 - Proposed orchard development farm portion (CenseoCapital, 2021)

	Year 1	Year 2	Year 3	Year 4	Year 5
New Orchard Development	28.00 ha	28.00 ha	28.00 ha	28.00 ha	13.00 ha
Total Planted Hectares	28.00 ha	56.00 ha	84.00 ha	112.00 ha	125.00 ha

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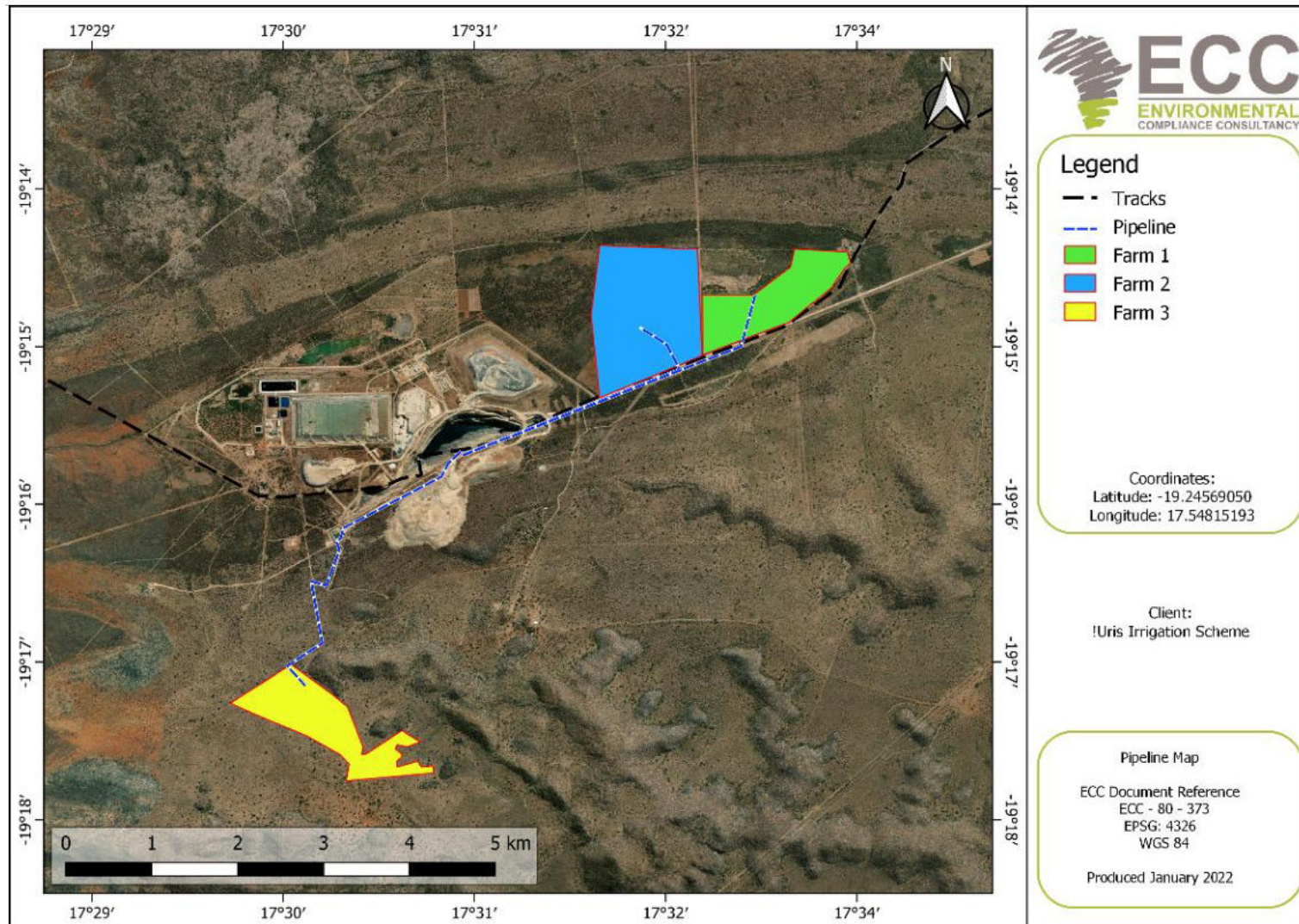


Figure 4 - Map showing the proposed pipelines to the three farm portions

5 ENVIRONMENTAL AND SOCIAL BASELINE

5.1 ENVIRONMENTAL BASELINE

5.1.1 Climate

The farm portions are situated to the west of Tsumeb in the Otjikoto Region, Namibia, which is between 1200 m and 1300 m above sea level. The area where the farms are located has a climate that is characterised by mild to hot humid summers and cool winters with the mean temperatures between 20 °C and 21 °C, with mean maximum temperatures ranging between 24 °C and 35 °C and mean minimum temperatures ranging between 10 °C to 22 °C (Figure 5). The hottest months of the year is between September and December and the coolest months are in June and July (Bubenzer, 2002 & meteoblue, 2021).

With regards to the Relative Humidity (RH), the most humid month of the year is between December and February at approximately 80% RH and the driest month is June to August with approximately 10% RH. The average rainfall in this area during the year is between 450 to 550 mm and rainfall events are limited to the summer months, mainly between November and March. Potential evaporation is between 3000 and 3200 mm per year (Bubenzer, 2002).

Climate and weather data for farm Uris have been used to give the most accurate data for the proposed Project. The site has wind speeds between 0 and 28 km/h, where the months of July to October are known to have the strongest winds. Wind can occur any time of the day and the most predominant wind directions for this area are east northeast, east and east southeast (Figure 6) (Meteoblue, 2021).

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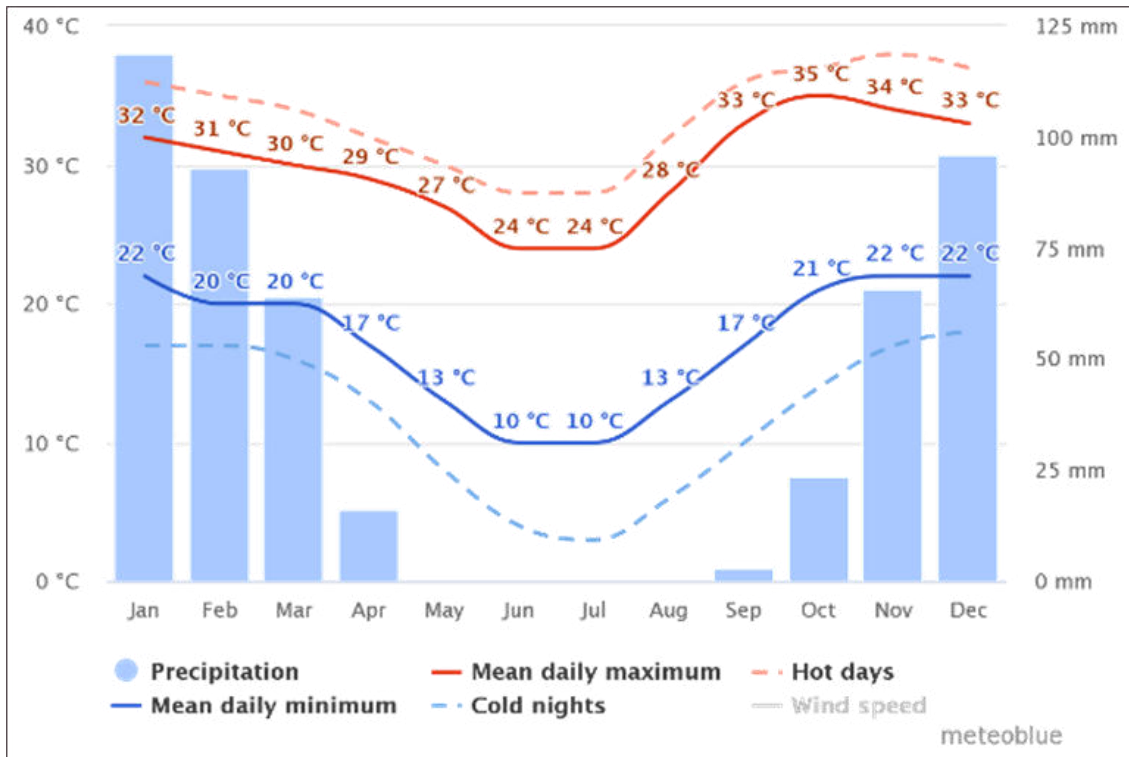


Figure 5 - Yearly climate overview for farm Uris (Meteoblue, 2021)

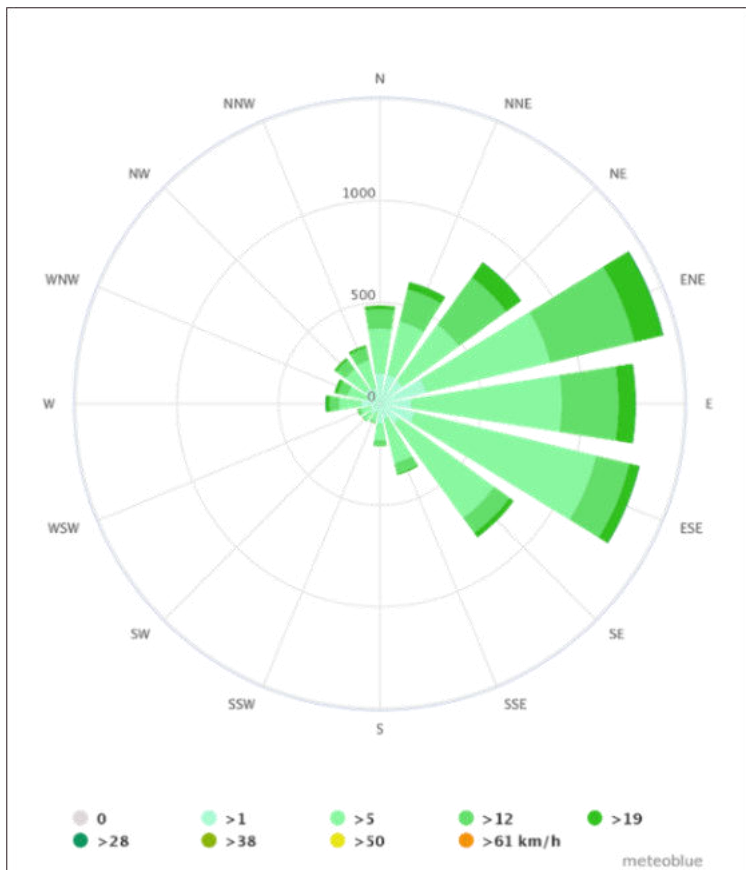


Figure 6- Average wind speed and wind direction for farm Uris (Meteoblue, 2021)

5.1.2 Geohydrology

Three different aquifer types can be distinguished within the locality of the site, including a Dolomite Aquifer, a Kalahari Aquifer and aquifers associated with dyke and fault zones. These are most likely hydraulically connected. The groundwater is approximately 68m below the surface in the dolomite aquifer and the water table is approximately 1214 – 1222 meters above mean sea level.

No major surface runoff occurs in the region and the drainage system is described as poorly developed. No rivers are on the site or the surrounding area.

During the rainy season, surface water drains from the north to the south of the site. The soil is permeable and drainage is considered good on the site (Synergistics Environmental Services, 2013). Farm Uris currently abstracts water from historic and existing boreholes for use on the lodge and farm.

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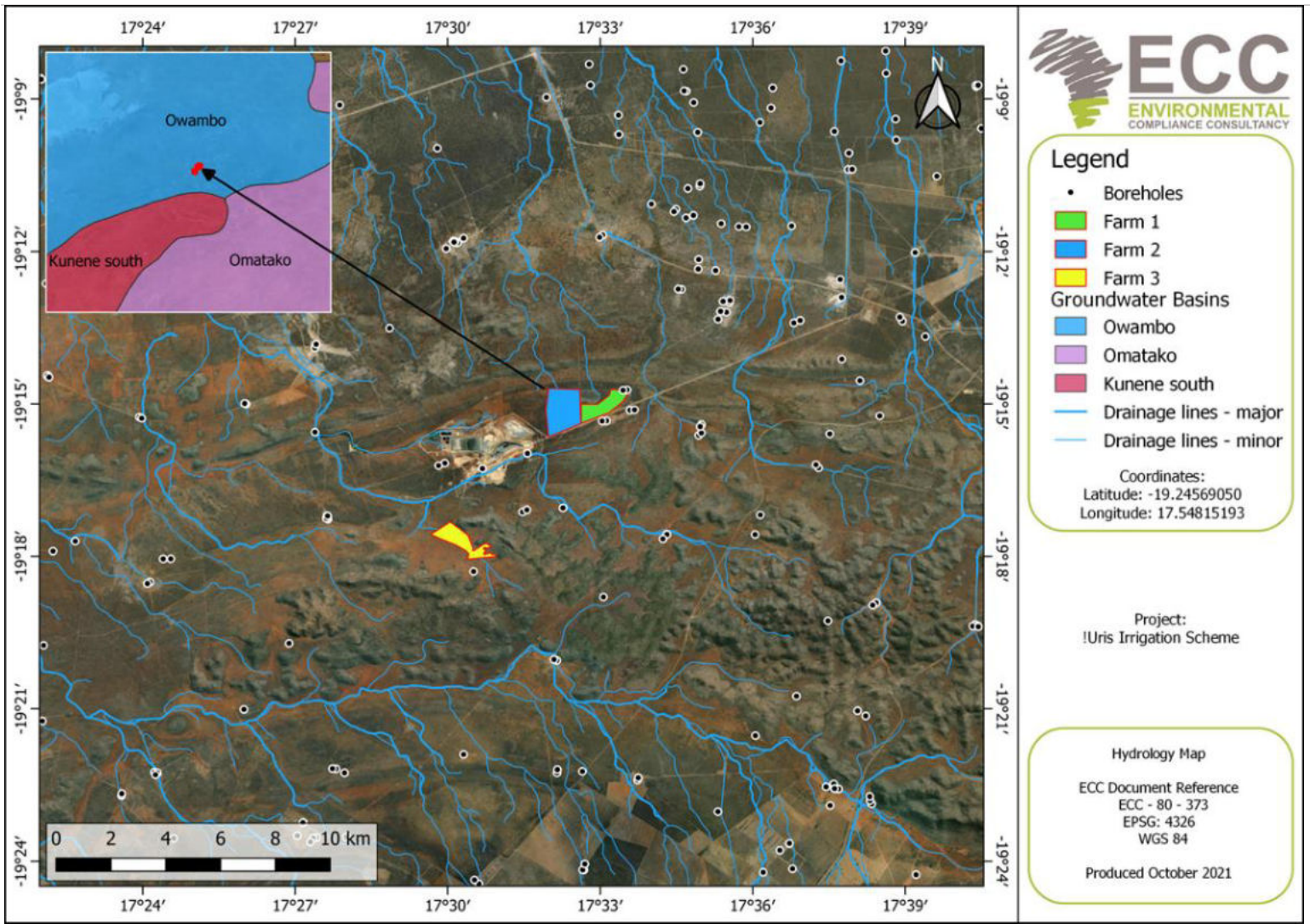


Figure 7 - Hydrology map of the area surrounding the proposed farm portions

5.1.3 Soils, Topography and Geology

The geology of the Project area consists of a succession of predominantly carbonate rocks (limestone and dolomite) of the Otavi Group, underlain and overlain by the Damara supergroup and the Gariep complex.

The dominant soil type is defined as Cambisols. By following the Food and Agriculture Organisation guidelines/ SOP/ framework/categorisation (FAO-Unesco,1974),¹ the Cambisols soils are characterized by the absence of a layer of accumulated clay, humus, soluble salts, or iron and aluminium oxides. The high mineral composition of the Cambisols soils makes this soil type highly desirable for agricultural purposes. Farm portions 1 and 2 lie over the cambisols soil group and farm portion 3 lies over rock outcrops.

¹ FAO-Unesco. (1974). *Soil map of the world*. Paris: Unesco.

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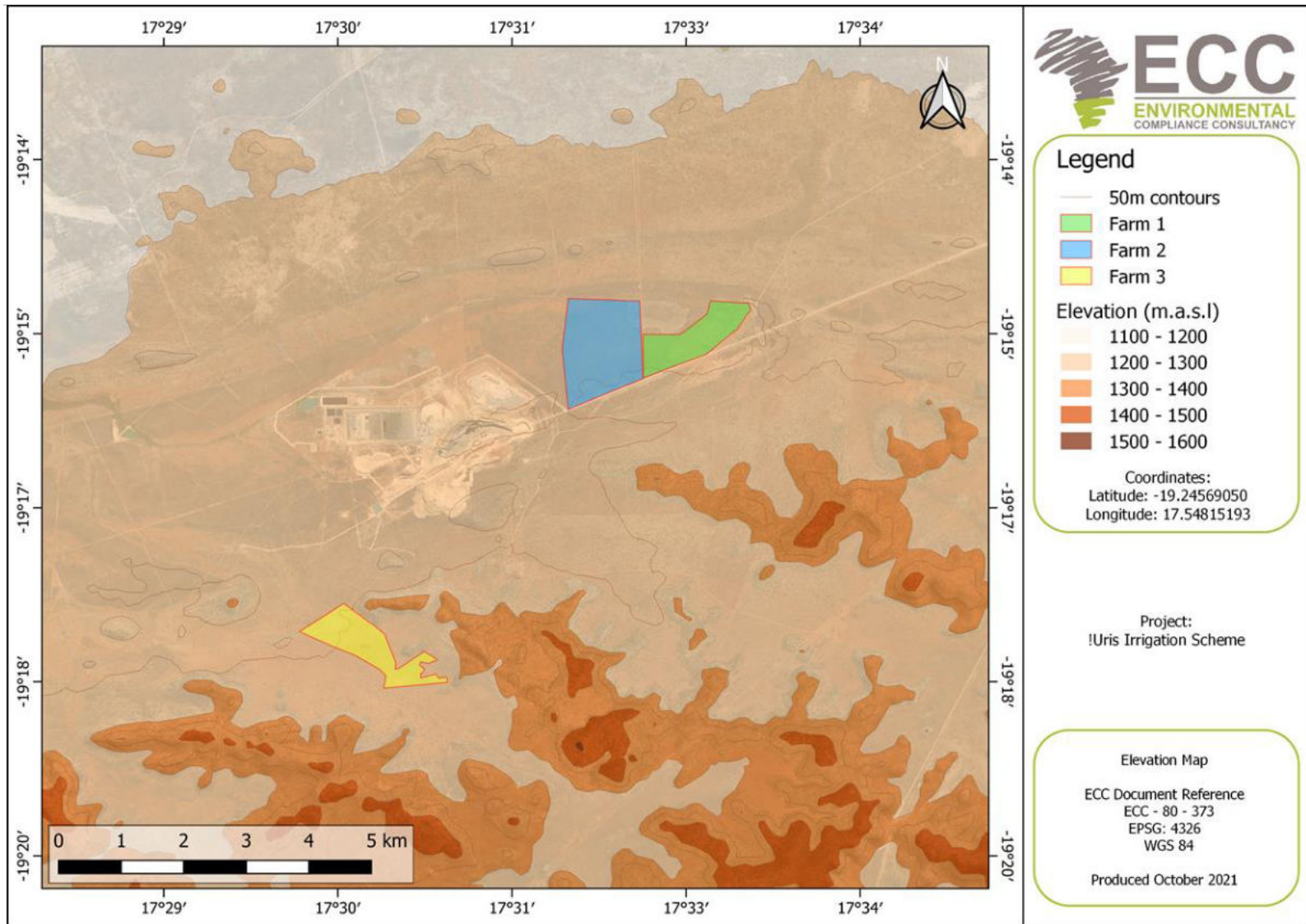


Figure 8 - Elevation map of the area surrounding the proposed farm portions

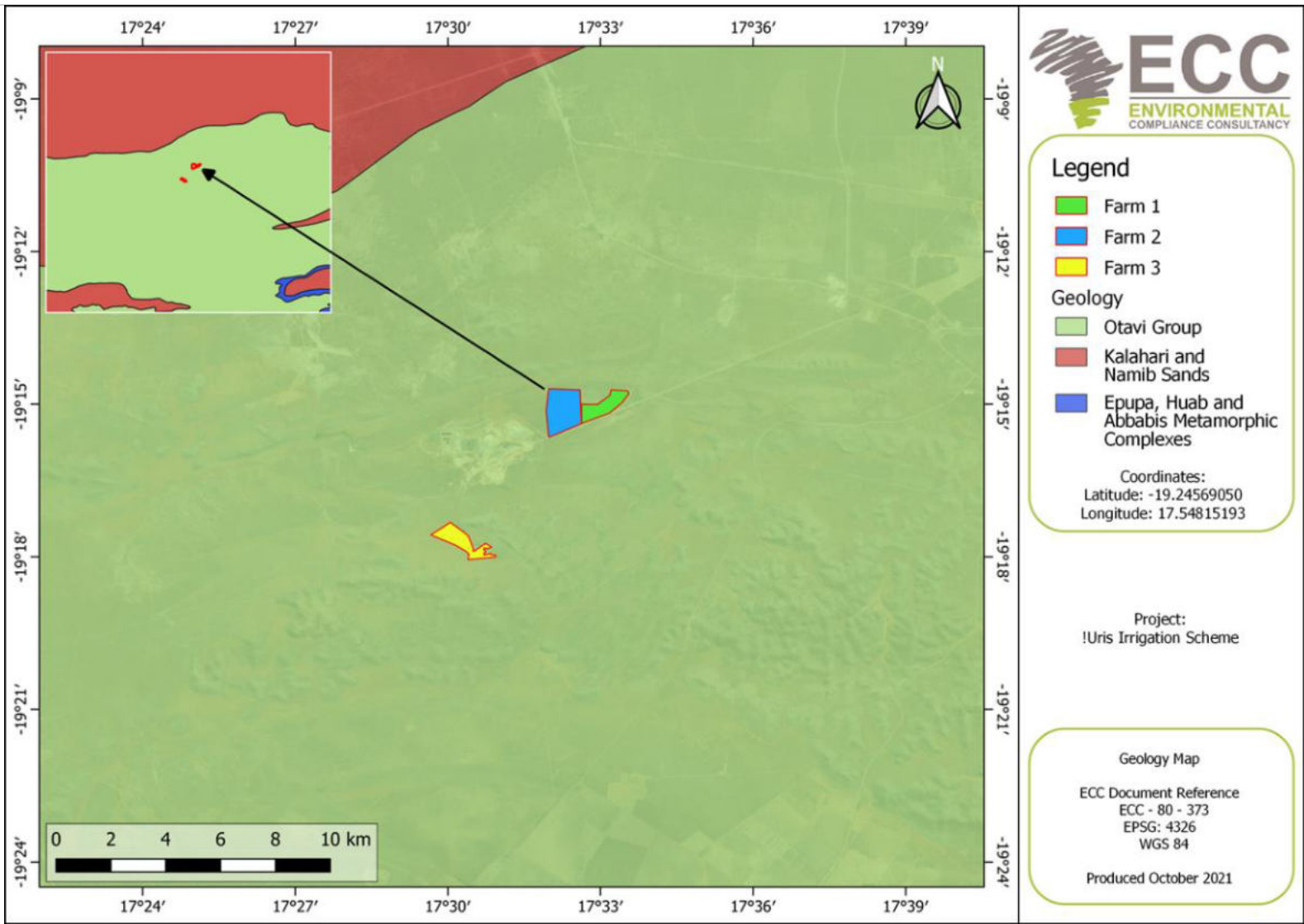


Figure 9 - Geology map of the area surrounding the proposed farm portions

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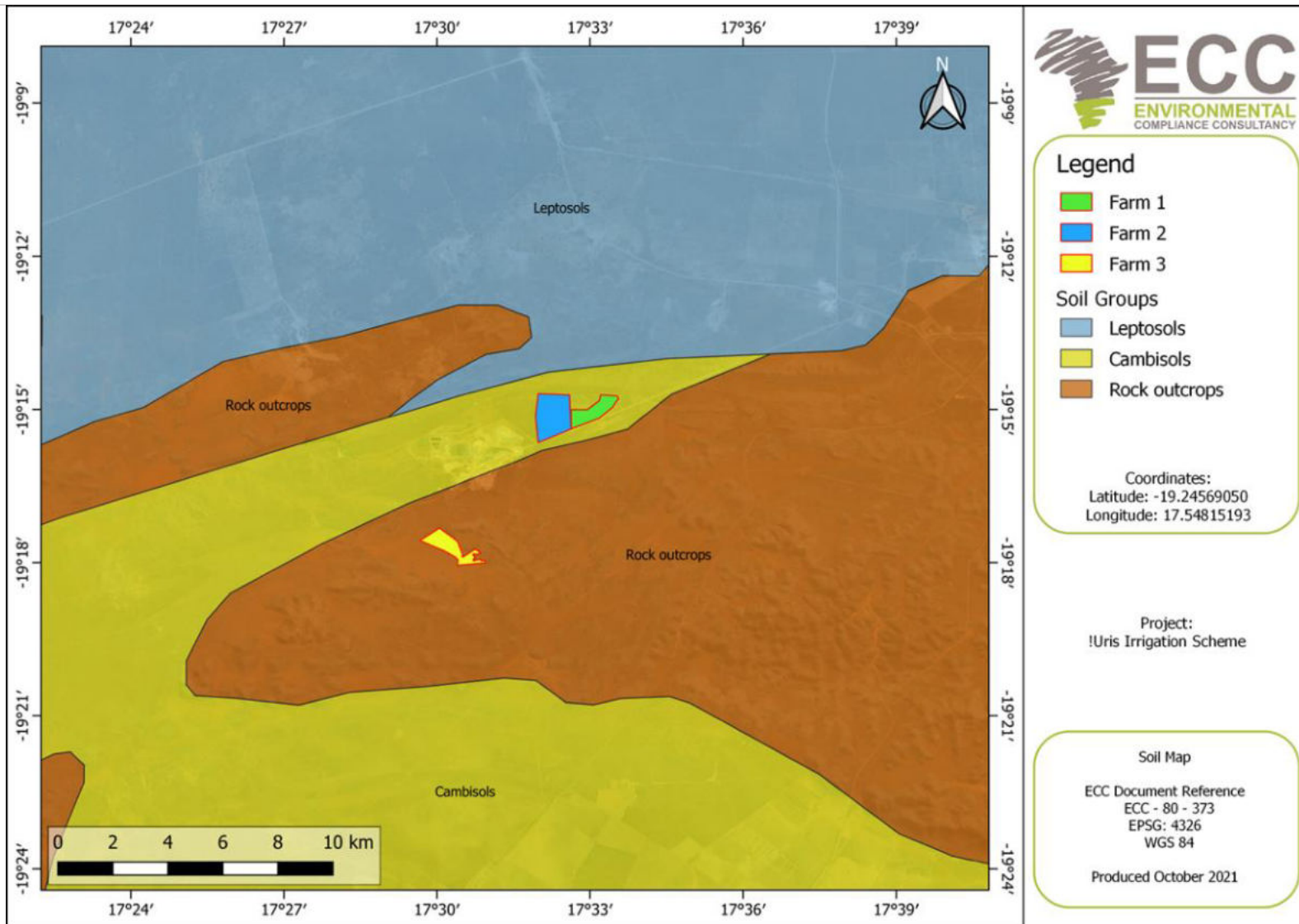


Figure 10 - Soils map of the area surrounding the proposed farm portions

5.1.4 Fauna

The overall terrestrial diversity for the area where the farm portions are situated is moderate compared to other parts of the country. The area within and surrounding the farm portions has an overall high bird diversity of between 201 and 230 species, with moderate bird endemism (between 4 – 5 species) and represents an area with moderate to high mammal diversity of between 76 and 90 species (3 to 4 of these species are endemic) (Bubenzer, 2002 & Mendelsohn et al., 2002).

Furthermore, the reptile diversity within this area is high with between 71 and 80 species, with between 5-8 endemic species; the number of observed lizard species for this area is between 28 to 31 different species and the different snakes recorded are between 35 to 39 species (3 to 4 endemic species). This area also has a frog diversity of between 12 and 15 species, and also a moderate scorpion diversity (10 to 11 species) (Bubenzer, 2002 & Mendelsohn et al., 2002).

The area where the farm portions are situated and surrounding areas are already disturbed (mine and irrigation Projects), thus the overall diversity of these areas is expected to be a bit lower than the diversity described in this section.

5.1.5 Flora

The vegetation in Namibia is strongly influenced by rainfall. The plant diversity and tallest trees are most lush in the north-eastern parts of the country and contrast sparser and shorter to the west and south of the country. This gradient is not simple as other factors such as soil types and landscape also influence the vegetation.

Due to the comparatively high rainfall and unique dolomite lithology of the area, it is recognised as a centre of plant species diversity in Namibia. The area has medium-high terrestrial diversity of plant life compared to the rest of Namibia. The Karstveld around the Tsumeb area is one of the notable zones of high diversity. The plant diversity in the area has between 400 – 500 species due to the area receiving higher rainfall than other areas in Namibia and the hilly terrain of the surrounding area.

5.2 SOCIO-ECONOMIC ENVIRONMENT

The Oshikoto Region is one of the fourteen regions in Namibia. It comprises of a population size of about 181 973 people according to the 2011 Namibia Population and Housing Census results. Oshikoto had a population of 181 973 people in 2011. The population grew at an annual rate of 1.2 percent between 2001 and 2011. The majority of the region's population, about 87 percent, live in rural areas. There are 37,400 households, with an average size of 4.8 persons per household. Oshikoto has ten constituencies namely: Eengondi, Guinas, Okankolo, Olukonda, Omuntele, Omuthiyagwiipundi, Onayena, Oniipa, Onyaanya and Tsumeb, which is the central point for major economic activities. The people of Oshikoto largely depend primarily on mahangu crop farming, cattle rearing and mining for their livelihood.

5.2.1 Employment

The rate of unemployment is estimated at 33.4% for Namibia, using the broad definition of unemployment. More than 60% of the population is over 15 years of age and about one-third of the total population can be regarded as part of the labour force. The unemployment rate in rural and urban areas is almost the same – 33.4% in urban areas and 33.5% in rural areas. The highest unemployment rates are found amongst persons with education levels lower than junior secondary. The unemployment rate of persons with no formal education is 28.6%, with primary education 34.6% and with junior secondary education 32.7% (NSA, 2019).

According to the socio-economic impact assessment of COVID-19 in Namibia by the United Nations Namibia (2020), there has been an estimated increase in unemployment from 33.4% to 34.5% and through a best-case scenario, it is also estimated that poverty will increase from 17.2% to 19.5% due to a drop in the domestic GDP (United Nations Namibia, 2020).

The Project currently employs approximately 38 full-time employees (18 on farm Uris and 20 on Farm Bobos). Employees work six days a week and hours may alter depending on the season and harvesting schedule. Residential or living quarters are not provided, as all employees are local and transport is provided by the Proponent.

5.2.2 Health

Since independence in 1990, the health status of Namibia has increased steadily with a remarkable improvement in access to primary health facilities and medical infrastructure. In 2015 the World Health Organization (WHO) recommended strategic priorities of the health system in Namibia, which entail improved governance and improved health information systems, emergency preparedness, risk reduction and response, preventative health care and

the combating of HIV/AIDS and TB (WHO, 2016). According to the MoHSS health facility census 2009, the Oshikoto Region only has a recorded 22 health care facilities (Ministry of Health and Social Services (MoHSS) [Namibia] and ICF Macro, 2011) and has a nutritional status (stunting rate) of 28.4% (Ochurus, 2007).

As of the beginning of 2020 the coronavirus disease (COVID-19), a communicable respiratory disease, causes illness in humans at a pandemic scale and has resulted in an increasing number of deaths worldwide. The viral outbreak is adversely affecting various socio-economic activities globally and with reports of the increasing number of people testing positive, it is anticipated that this may have significant impacts on the operations of various economic sectors in Namibia too. The disease caused many countries to enter a state of emergency and lockdown mode, with dire economic consequences.

Furthermore, COVID-19 has also resulted in a loss of learning and socialising opportunities for children in Namibia and there was a lack of access to school feeding programs and parents had to provide or find alternative care for children. There has also been a 6% increase in health workers across Namibia as a result of the pandemic (United Nations Namibia, 2020). By mid-November 2021, Namibia has had 3,319 deaths due to COVID-19 in 2021. There were a total of 205 deaths in 2020.

6 IDENTIFICATION AND EVALUATION OF IMPACTS

METHODOLOGY

6.1 INTRODUCTION

This chapter outlines ECC's method to identify and evaluate impacts arising from the proposed Project. The findings of the assessment are presented in Chapter 7.

The identification and evaluation of the environmental and social impacts require the assessment of the Project characteristics against the baseline characteristics, ensuring all potentially significant impacts are identified and assessed. The significance of an impact is determined by taking into consideration the combination of the sensitivity and importance/value of environmental and social receptors that may be affected by the proposed Project, the nature and characteristics of the impact, and the magnitude of potential change. The magnitude of change (the impact) is the identifiable changes to the existing environment that may be described as negligible, low, minor, moderate, high, or very high; temporary/short term, long-term or permanent; and either beneficial or adverse (Figure 11).

The methodology, consistent with globally recognized standards, will be applied to determine the magnitude of impacts and whether each one was considered significant and thus warrant further investigation. The assessment considers all stages of the Project's life cycle. It is an iterative process that commences at Project inception and runs through to the final design and Project implementation (operations). The impact prediction and evaluation stages were undertaken in November 2021 and the findings of the assessment will be presented in this Scoping and Impact Assessment report.

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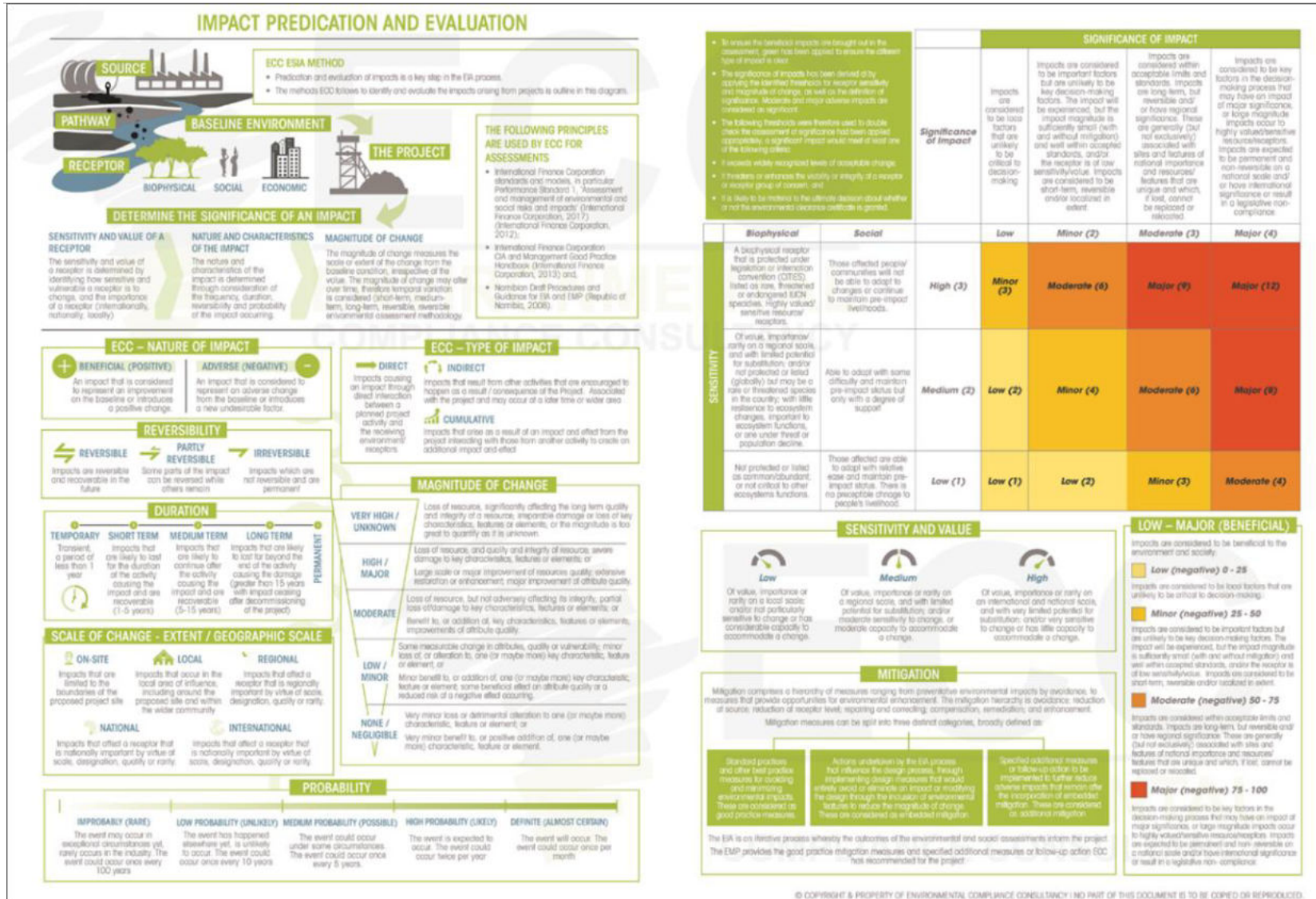


Figure 11 - ECC's impact assessment methodology

7 IMPACT ASSESSMENT FINDINGS AND PROPOSED MITIGATION MANAGEMENT MEASURES

7.1 INTRODUCTION

This chapter presents the findings of the ESIA for the proposed Project as per the EIA process, scope, and methodology set out in Chapter 2 and Chapter 6. A range of potential impacts has been identified that may arise as a result of the proposed Project. This EIA report aims to focus on the significant impacts that may arise as a result of the proposed Project and form the focus of this chapter, as well as those impacts that may have specific interest to the community and stakeholders. A summary of impacts that are not considered significant is discussed in Section 7.2.

For each potential significant or sensitive impact, a summary is provided which includes the activity that would cause an impact; the potential impacts; embedded or best practice mitigation (stated where required / available); the sensitivity of the receptor that would be impacted; the severity, duration, and probability of impacts; the significance of impacts before mitigation and after mitigation measures are applied.

7.2 IMPACTS NOT CONSIDERED AS SIGNIFICANT

As a result of an iterative development process, mitigation has been incorporated and embedded into the Project, thereby designing out potential environmental and social impacts or reducing the potential impact so that it is not significant. Best practice has also played a role in avoiding or reducing potential impacts. The EMP provides best practice measures, management and monitoring for all impacts.

Impacts that have been assessed as **not being significant** are summarized in Table 7 and thus not discussed further.

Table 7 - Impacts not considered significant

Environment or social topic	Potential impact	Summary of assessment findings
Cultural heritage	Potential to uncover heritage remains during Project activities.	A "Chance-Find" procedure is contained in the EMP. No further assessment is required.
Visual	Potential that farm vehicles, equipment and proposed orchards could be a visual nuisance for people in the area.	People using the access road are predominantly travelling to or from the mine; and thus not considered as a receptive receptor. View from the lodge shall not be affected. This part of Namibia has various agricultural and irrigation projects and is expected to blend in and thus not expected to be significant.
Sense of place	Potential of disturbed sense of place for the local farmers/community.	No further assessment was required, as this part of Namibia has various agricultural and irrigation projects and the !Uris and Bobos irrigation scheme has already obtained an environmental clearance certificate and operations have already started.
Soil	Potential soil disturbance with regards to the construction of the new proposed pipelines.	The impact is unlikely to be significant because the Proponent intends to construct and bury the pipes within already existing road servitudes, which suggests that the soil is possibly already disturbed and compacted. Mitigation measures outlined in the EMP should be followed to minimise soil disturbances during the construction and installation of pipelines.
Surface and Groundwater	Potential for changes to natural drainage leading to increased surface runoff during rainfall events may lead to localized flooding. Loss of hydrocarbons could contaminate groundwater. Accumulation of pesticides entering the groundwater.	It is also unlikely for hydrocarbons, pesticides and fertilisers to reach the groundwater due to depth and hydrogeology. Additionally, there are no surface water features present, thus no further assessment is required.
Employee and Community	Potential impact on human health (intoxication risk) with regards to chemical/ herbicides/pesticides used	The EMP outlines some health and safety mitigations but the Proponent will be responsible to implement a health and safety management plan.

Environment or social topic	Potential impact	Summary of assessment findings
Health and Safety	as relevant chemicals/herbicides/pesticides should be used by skilled and trained personnel	
Socio-economics	Potential effect on the local and regional economies. New jobs and indirect local spending. Increased agricultural skills in the area. Diversification of land use activities and income.	Only positive impacts are anticipated for the Project. Direct, indirect and potential seasonal job opportunities are foreseen for the irrigation scheme; as such, no further assessment is required.
Waste management	Solid waste may be produced during the proposed Project's construction and operational period.	<p>This impact was deemed to be possible, however, the Proponent has an ongoing waste management plan to counter the impact of waste dispersal on and surrounding the Project site.</p> <p>All waste disposal sites should be managed by following documented, site-specific waste management plans:</p> <ul style="list-style-type: none"> (i) Solid, liquid and hazardous wastes are transferred only to facilities specifically designed, approved and operated for that purpose; (ii) Access to the site is controlled and disposal activities are supervised by trained personnel; and (iii) Records are maintained of the types, approximate quantities and point of origin of the wastes.
Biodiversity	Potential impacts to flora and fauna from the proposed construction and installation of the pipelines.	<p>The potential impact on fauna and flora is unlikely to be significant as the proposed Project will be established in an already disturbed footprint next to a mine and areas already cleared of vegetation.</p> <p>Protected species will be identified and measures for conservation or removal shall be recorded in the Harvesting Permit as issued by MEFT.</p>

Environment or social topic	Potential impact	Summary of assessment findings
		Mitigation measures outlined in the EMP should be followed for the construction and installation of the pipelines.
Ecology	Potential disturbance and negative impacts due to operational activities at the irrigation Scheme.	Protected plant species will be identified and measures for conservation or removal shall be recorded in the Harvesting Permit as issued by MEFT.
Noise	Potential for noise from the movement of vehicles (trucks) and machinery. Noise impacts neighbours.	With the short duration, an isolated and small change to the baseline is anticipated. Receptors at the lodge are approximately 1.5 to 2 km away from the irrigation site on farm Uris. The proposed farm portion on farm Bobos is also a few kilometres away from the lodge and about 2.2 km away from the nearest house/residents (on the opposite side of the mountain to the northeast). Therefore, are unlikely to hear operations on-site and this impact has been assessed to be of low significance.
Air Quality - Dust	Potential dust generation from construction and operational activities.	The Project operations are unlikely to generate excessive aerial emissions that are not manageable or that will significantly impact sensitive receptors. Also, the nearest community is outside the farm Uris area, which is more than 3 km. The farm portion on farm Bobos is also about 2.2 km away from the nearest house/residents (on the opposite side of the mountain to the northeast).
Landscape and visual amenity	Potential in changes of land use.	The potential impact on the landscape is highly unlikely as people that use the access road predominantly travel to or from the mine and thus not considered as a sensitive receptors, so no further investigation is required.
Soil Erosion	Excessive surface runoff may cause changes to the baseline drainage dynamics of the site leading to soil quality reduction.	With the proposed gradual clearing of land for irrigation purposes and by following the recommended mitigation measures in the EMP, the impact is expected to minor and thus no further investigation was required.

7.3 SIGNIFICANT ISSUES TO BE ADDRESSED

Table 8 - Table of potentially significant impact

Environment or social topic	Potential impact	Summary of assessment findings
Soil Quality	The use of chemicals may contribute to soil quality reduction.	Mitigation measures will be implemented through the EMP to avoid loss of containment and best practice measures from fertilizers and pesticides shall be applied.

7.4 POTENTIAL ENVIRONMENTAL IMPACTS AND ASSESSMENT

7.4.1 Soil quality

In Namibia, soils are generally rich in material derived from physical weathering and tend to contain little organic matter because of the water-holding capacity. According to the FAO Unesco Soil Map of the World (FAO-Unesco 1974), about one-third of Namibia is covered by extremely erodible Leptosols, soils on which the majority of the commercial farmland is situated. The fertility of the soils on the proposed Project site and local area are generally low, largely as a result of low clay and silt fractions, combined with extremely low percentages of organic matter and nitrogen, low cation exchange capacities and low trace element values (Synergistics Environmental Services, 2013). A study was undertaken for Farm Uris by Smith, (2015) and concluded that some soil quality would need to be improved through the application of fertilizers and that there would be a risk of soil quality to reduce over time.

Soil quality could be affected as a result of the change of land use. Through changing land use, the following shall occur which could contribute to a reduction in soil quality, reduction in nutrients and microorganisms, accumulation of chemicals or contamination:

- Vegetation clearing;
- Soil tilling to achieve suitable conditions to grow crops;
- Change to natural drainage and local topography altering surface runoff (water soil erosion and sedimentation);
- Chemical use (fertilization and pesticides); and
- Harvesting activities and practices (including poor harvesting practices), including the use of heavy plant and equipment (soil erosion, loss of containment), exposed soil after harvesting (wind erosion) and poor soil management.

Whilst the soil quality of the area is considered to be low, there is potential for an adverse and localised effect that may arise due to over-irrigation, leading to waterlogging over time and the potential overuse of arboricides that might be detrimental for microorganisms. Soil quality could thus be reduced further and therefore the success of the proposed Project and potential long-term impacts on the environment could be affected.

The sensitivity of the receptor is rated as medium because although the risk is minor, the health of soil and the role soil plays in a local ecosystem is essential; thus, the risk must be managed according to the EMP to prevent or reduce the potential negative impacts as far as reasonably practicable. With additional mitigation measures, the effects on soil quality would be reduced to low significance (Table 9).

Table 9 - Impacts related to soil quality

Description of activity	Receptor	Description of impact	Effect/ description of the magnitude	Value of sensitivity	Magnitude of change	Significance of impact	Residual impact after mitigation
Irrigation scheme: Operational phase	Soil Quality	Potential for soil quality reduction. The improper use of chemicals may contribute to soil quality reduction.	Adverse Cumulative Partly reversible Minor Medium Term Local Likely	Medium	Minor	Minor (4)	Low (2)

Impact management/control measures may include but are not limited to the following:

- Plant crops suitable to the soil quality, climate and needs as per the Agriculture Study (Smith, 2015);
- Reduce chemical use as far as reasonably practicable;
- Consider using organic/natural fertilizers;
- The water from boreholes used for irrigation purposes should be sampled;
- Downstream water should be sampled; and
- Sample soil every three years and have it tested for nutrient levels and other characteristics to ensure maximum yield potential, as well as to detect soil deficiencies or overburdening.

8 ENVIRONMENTAL MANAGEMENT PLAN

The site has an approved and existing environmental management plan. The assessment for the amendment to include increased footprint mitigation measures have been proposed in the environmental management plan provided in Appendix A.

9 CONCLUSION

The scoping assessment focuses on the environmental and social receptors that would likely be affected by the proposed Project. Due to the nature and scale of the Project and associated activities, the sensitivity of the receiving environment and the predicted magnitude of change to the receiving environment, it is unlikely that significant environmental and social impacts will occur. Through the implementation of mitigation measures set out in the EMP (see Appendix A) minor environmental and social impacts can be avoided or reduced.

The implementation of the EMP as an outcome of the impact assessment process would serve to minimise the impacts and risks associated with the proposed amendment to an environmental and socially acceptable standard.

The environmental assessment that was undertaken for the proposed Project followed ECC's ESIA Methodology to identify if there is potential for significant effects to occur as a result of the proposed Project. Through the scoping process, the only risk to the environment was the potential for soil quality to be affected; all other social and environmental receptors were scoped out, as it was unlikely that there would be significant effects.

Through further analysis and identification of mitigation and management methods, the assessment concludes that the likely significance of effects on soil quality is expected to be minor. Various best practices and mitigation measures have been identified to avoid and reduce effects as far as reasonably practicable, as well as ensure the environment is protected and unforeseen effects are avoided.

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APPENDIX A – ENVIRONMENTAL MANAGEMENT PLAN

APPENDIX B – ENVIRONMENTAL CLEARANCE CERTIFICATE

ECC – 0041 Serial No p0REoi41



REPUBLIC OF NAMIBIA
MINISTRY OF ENVIRONMENT AND TOURISM
OFFICE OF THE ENVIRONMENTAL COMMISSIONER


ENVIRONMENTAL CLEARANCE CERTIFICATE
ISSUED

In accordance with Section 37(2) of the Environmental Management Act (Act No. 7 of 2007)

TO
Three Musketeers investment (Pty) Ltd
PO BOX 1321 TSUMEB , Cnr of Sam Nujoma and Jan Jonker Road, Wasserberg Park, Unit 4, Klein Windhoek

TO UNDERTAKE THE FOLLOWING LISTED ACTIVITY


APPLICATION FOR ENVIRONMENTAL CLEARANCE CERTIFICATE FOR THE PROPOSED IRRIGATION SCHEME ON THE FARM URIS 481 USING EXCESS WATER PRODUCED FROM THE TSCHUDI COPPER MINE, OSHIKOTO REGION.



DEPUTY ENVIRONMENTAL COMMISSIONER

Issued on the date: 12-07-2019
Expires on this date: 12-07-2022

(See conditions printed over leaf)



ECC –

CONDITIONS OF APPROVAL

1. This environmental clearance is valid for a period of 3 (three) years, from the date of issue unless withdrawn by this office
2. This certificate does not in any way hold the Ministry of Environment and Tourism accountable for misleading information, nor any adverse effects that may arise from these activities. Instead, full accountability rests with the proponent and its consultants
3. This Ministry reserves the right to attach further legislative and regulatory conditions during the operational phase of the project
4. All applicable permit/s should be obtained from the relevant authority

APPENDIX C – PROOF OF PUBLIC CONSULTATION



**NOTICE OF ENVIRONMENTAL ASSESSMENT AND
PUBLIC PARTICIPATION PROCESS**

IRRIGATION SCHEME ON FARM URIS 481, OSHIKOTO REGION, NAMIBIA

Environmental Compliance Consultancy cc (ECC) hereby gives notice to the public that an application for an Environmental Clearance Certificate in accordance with the Environmental Management Act, 2007 will be made as per the following:

Applicant: Three Musketeers Investment (Pty) Ltd
Environmental Assessment Practitioner (EAP): Environmental Compliance Consultancy

Project: Proposed irrigation project located on Farm Uris 481, using excess clean waste water produced from the Tschudi Copper Mine, Oshikoto Region.

Proposed Activity: The proposed project is for the creation of an irrigation scheme using excess clean waste water from the Tschudi Copper Mine. The proponent shall grow plants and/or produce fresh produce. Activities envisaged during the construction phase include vegetation clearing, construction of a water pipeline, ground preparation and the construction of irrigation infrastructure.

Location: Oshikoto Region, Namibia.



Application for Environmental Clearance Certificate: In terms of the Environmental Management Act, 2007 (No 7 of 2007), ECC on behalf of Three Musketeers Investment (Pty) Ltd is required to submit an application for Environmental Clearance to the Competent Authority and the Ministry of Environment and Tourism for the above-mentioned project.

Review Period: The review and comment period is effective from **9th August 2018 – 30th August 2018**.

Purpose of the Review and Comment Period: As part of the public participation process, the purpose of the review and comment period is to present the proposed project and to afford interested and affected parties an opportunity to comment on the project to ensure that all issues and concerns are captured and considered in the assessment.



Contact: Mr JS Bezuidenhout or Mrs J Mooney
Environmental Compliance Consultancy
Registration Number: CC/2013/11404
PO Box 91193, Klein Windhoek
Tel: +264 816 53 1214 or +264 81 653 1214
E-mail: info@eccenvironmental.com
Website: <http://www.eccenvironmental.com>
Project ID: ECC-80-162

SMS Of The Day

■ WHAT Constitution? That's the biggest question for us as Namibians to answer and the true power behind the most powerful entity in our nation. This being said, so it's acceptable of what happened with the SME Bank case and the Shoprite situation? Namibians are clearly untouched, the new avengers!

and listen to the plight of the citizens of the country, including the workers? Ministry of labour, please intervene in this matter. The Chinese shop owners are exploiting the poor citizens of this country.

■ THE most dormant ministry in Namibia is that of veterans' affairs. That's why the deputy minister was given the platform to speak at an aquaculture function in the south. There is absolutely nothing happening at that ministry, considering the fact that most veterans of the liberation struggle are also fading away. I don't know why it's even catered for when it comes to budget allocations by government. That ministry should be transformed into a department under the Ministry of Defence since most veterans were fighters.

■ NFA secretary general Barry Rakoro, Fifa's rule is clear by saying that a person cannot own two teams in the same league, but the NDF teams are not owned by one person or a ministry. They belong to their units in separate towns and operate with their own funds provided by that unit through their sports account. For your information, Mighty Gimmers and Eleven Warriors are not owned by the ministry and even their winning money belongs to their unit. Just allow the military school to go through if they win.

■ INTERNATIONAL relations minister Netumbo Nandi-Ndaitwah congratulated Zimbabwe on the recently concluded "peaceful elec-



tions". She failed to add that the lives of six people, innocently killed by the army, constitute part of these peaceful elections. You should be ashamed of yourself, dear honourable minister.



■ NOW that Sophia Shaningwa dumped her useless board of directors at NHE, she cannot even see that those guys lack skills and knowledge and, more importantly, experience. Please minister Leon Jooste, remove them now and don't renew their term.

■ IT'S terrible, as citizens we just wait every day to read about the next proposed law that will further hurt our economy, or the next big corruption case which will not be investigated. Is there hope for our country?

■ I DO not understand why home affairs allowed Steve Hofmeyer to come and do concerts in the country. Racists should not be welcome here. Can the Ombudsman not charge Hofmeyer for promoting racism?

■ NAMIBIA land of beer. My father used to say: "Everybody says we Namibians drink too much, but nobody is a skin how big our thirst is!"

I am white and trying to run an SME. Even after agreeing during the amnesty programme that they owe me and that I owe them nothing, they keep haunting me with invoices for horrendous amounts. Even my father, who is over 90, and receives only a small pension, is persecuted by the Ministry of Finance.

■ SOME staff members who are receiving bush allowances are not staying at their duty stations and are staying in towns and are claiming S&T whenever they are being called for meetings. They are claiming like they are from their respective duty stations. Ministries, please investigate some of your staff members. This applies to all regions.

Fishing Industry

■ THE statement by the chairman of the Fishing Association is misleading, undermining and is having an element of being greedy. Are we implying that ordinary Namibians' fishing rights will not create jobs in the industry? Namibia's resources are for all. These 28 years you have been benefiting at our expense and now that we are being directly involved, you come up with greedy, discouraging statements. Minister please ignore him. That's his freedom of expression but not of the poor who have benefitted. The slogan is: "No Namibian must feel left out".

■ MATTI Amukwa, if the fishing industry is not an ATM for us why is it an ATM for you and others? Please stop being greedy. You already have enough and leave other citizens also to benefit from our natural resources. What type of leaders do we have in this country?

From The Regions

■ GOBABS Maintenance Court, we really need help with the men that are working for the government. For five years now, the money is deducted from their salaries but we don't get the money. Every time we go there to enquire, we just get the same answer saying the money will be deducted next month - but it's five years now. No improvement year in and year out, really. We need help. It can't go on like this.

■ ONGWEDIVA Town Council is doing nothing in terms of developing their town. The streets are dusty, they did not service the land for ages, there are many people that applied for plots but there are no plots. You guys should do what Oshakati is doing. Almost the whole of the Oshakati west roads are of bitumen standards and their land delivery is moving fast.

■ HOW long will it take for an answer from the ministry on a grant application I made in April this year in the //Karas region? I am still waiting and it's August now. I am happy for the help from government, but the people in the of//kes must please act fast.

■ WE, the community of Nakatava village, in the Kavanago West region, are calling upon MTC Namibia to erect a network tower at our village. We really need a network tower because we are struggling to communicate with the outside world.

■ A BIG word of thanks goes to

Tangeni from Tsumeb for selling nice fresh meat in Sowebo location. God bless you, brother. We, the community, are very happy with your meat which is also affordable. The Tsumeb residents salute you.

■ TO the person regarding Erongoed costs for electricity. Enquire whether your prepaid metre is registered for residential purposes and single phase. Should you have 380volt and the normal 220volt, you will pay a higher price per unit.

■ SHAME on Lüderitz Town Council for being bullied by local businesses to evict street vendors from the CBD. By the way, all pavements are public spaces. - Taleni

Health

■ MINISTRY of health, why are we suffering with TB? Why are the TB held promoters not working any more? We the patients at villages in the surroundings of Ndama Clinic, are suffering a lot and TB is now spreading faster than previously when we were given information about the disease. Why are the leaflets no longer distributed? Those held workers were very helpful in our communities surrounding all regions. Please minister, Bernard Haukku, come to our rescue.

■ YOUR article that rural Namibia is the most unhygienic is true, but we need to do an analysis when the funds allocated to regional government to build toilets was spent, eg. All households in Epina village, Ohangwena region, has a toilet but since day one those toilets never worked. Someone needs to account for that.

■ SO rural Namibia is the most unhygienic in SADC. This is such an embarrassment and gives the impression of an uncaring and selfish leadership.

■ HEALTH minister, why don't you put old vehicles on auction to maintain needed health resources? I saw some of the state hospitals store old vehicles behind buildings on the premises while they are not used at all!

In Response

■ Herewith, please find our response to the SMSes that appeared in the edition of Tuesday, 14 August 2018.

SMS ■ NAMIBIANS have to endure the worst customer service in the world. Unfortunately we seem to simply accept it, instead of speaking up loudly whenever it occurs. But may I commend the excellent service that I always receive from MTC Customer Care Centre, when I call 081120. The service is always in form ed, most helpful and professional.

■ RESPONSE: Dear reader, firstly thank you for the kind review and for taking the time to advise on your experience at our Customer Care Centre. At MTC we strive to be the best, and it is only through feedback such as yours that we can maintain and indeed, where necessary, improve upon the service that we provide to our valued customers. Once again, our gratitude and appreciation for the kind remarks

Food For Thought

■ MINISTER Tom Alweendo calls for a new mindset to develop the energy sector. It's laughable, his comments. How about you get rid of the single buyer policy nonsense and have companies generate and sell to whoever they want? The minister must liberate the energy sector, so that we can apply our own innovative thinking to solve our energy and electricity crisis.

Bouquets And Brickbats

■ I'M really disappointed with the lawmakers of Namibia. I am a shop assistant at a Chinese shop earning only N\$500 per month, while some domestic workers are earning N\$1500-plus. What is the duty of the MPs when they go to parliament apart from demanding a bigger and improved parliament? Are they also not supposed to look

Tell it like it is!

Ma ke your vi deo s own. It costs N\$1 for 160 ch aracters. You will receive the link to view it in the next 24 hours. We will publish the video on our website. We are not making profit from this service to the public.

Of the responsibility only in my bid to inform to: sms@tmt.com.na NB: We would like to inform our members of the public to be careful good judgement when sending their comments to the news paper. The Namibian publish the SMS to promote the civil discussion.

Finance

■ COMMISSIONER of the Receiver of Revenue, why do we have to wait so long after VAT audits for our refunds? Whenever we enquire about our refunds it seems the delays are always with certain individuals. We are running businesses and need cash flow. This can't go on like this. Our President has spoken about delays. You want prompt payments, we also want prompt refunds, please.

■ CAN Agribank please explain to us how long are we supposed to wait after we paid our registration and upfront fees to get a loan to buy livestock? Three years ago, we paid our fees to Oanob Hot Springs Cooperative and up to now there are only empty promises. Please investigate, because only the first phase people wanted to benefit, as they are holding close door meetings.

■ PLEASE stop making the Ministry of Finance's drive to collect more tax a racial issue.

■ A BIG word of thanks goes to

ENVIRONMENTAL COMPLIANCE CONSULTANCY

NOTICE OF ENVIRONMENTAL ASSESSMENT & PUBLIC PARTICIPATION PROCESS

IRRIGATION SCHEME ON FARM URIS 481
OSHIKOTO REGION, NAMIBIA

Environmental Compliance Consultancy cc (ECC) hereby gives notice to the public that an application for an Environmental Clearance Certificate in accordance with the Environmental Management Act, 2007 will be made as per the following:

Applicant: Three Musketeers Investment (Pty) Ltd
Environmental Assessment Practitioner: Environmental Compliance Consultancy
Location: Oshikoto Region, Namibia.

Project: Proposed irrigation project is located on Farm Uris 481, using excess clean wastewater produced from a neighboring Mine, Oshikoto Region.

Proposed Activity: The proposed project is for the creation of an irrigation scheme using excess clean waste water from a local mine. The proponent shall grow plants and/or produce fresh produce. Activities envisaged during the construction phase include vegetation clearing, construction of a water pipeline, ground preparation and the construction of irrigation infrastructure.

Application for Environmental Clearance Certificate: In terms of the Environmental Management Act, 2007 (No 7 of 2007), ECC on behalf of Three Musketeers Investment (Pty) Ltd is required to submit an application for Environmental Clearance to the Competent Authority and the Ministry of Environment and Tourism for the above-mentioned project.

How you can participate: ECC is undertaking the required environmental assessment and public participation process in accordance with the Act. Interested and affected parties (I&APs) and Stakeholders are required to register for the project at: <http://ecc.environmental.com/Project/uris-irrigation-scheme/>

Purpose of the Review and Comment Period: As part of the public participation process, the purpose of the review and comment period is to present the proposed project and to afford I&APs an opportunity to comment on the project to ensure that all issues and concerns are captured and considered in the assessment.

Review Period: The review and comment period is effective from 09 August 2018 - 30 August 2018.

Contact: Mr J.B. Bazuidenhout or Mrs J. Mooney
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E-mail: info@eccenvironmental.com
Web site: <http://www.eccenvironmental.com>
Project ID: ECC-79-165

Please note that the opinions expressed do not necessarily reflect the views of The Namibian.

National Council stronger at 25 – Mensah-Williams

THE National Council on Tuesday marked its silver jubilee in the capital, highlighting 25 years of success, challenges, lessons learnt and the legislative role it played.

National Council Chairperson Margaret Mensah-Williams said the council's journey to where it is now was not a stroll in the park. She pointed to a host of challenges, chiefly the lack of its own chamber, underfunding and low salaries. However, some of the challenges have been addressed, such as the salaries of NC members, which were adjusted to the level of their peers in the National Assembly, she said.

Another challenge for the council was the separation of the administration from the National Assembly. "There were proposals to have one secretary for both houses. But in the end, there was consensus that it made more sense to have separate administrations

for the efficient running of the legislature," she said, adding that "you cannot be referee and player at the same time."

Mensah-Williams further said the business of the National Council has over the years been characterised by members seeking practical solutions to problems people face daily. Shortly after delivering her address, the Chairperson responded to critics who say the council has lost its relevance in recent times.

"There will always be those who say we are irrelevant. But actions speak louder than words. We are the first house to come out with a white paper. We brought the motion on the removal of the red line; today it is a topical issue. It is us who brought the issue of human-wildlife conflict to the fore," she said.

Another notable achievement, she pointed out, was when the house of review passed the constituency development fund bill, aimed

at making direct budgetary provisions for constituencies, in 2015.

Moreover, since 2006, NC members have consistently declared their assets and business interests for public scrutiny, something worth commending, Mensah-Williams stated.

"When I look back at how far the National Council has come, I realise that as members of parliament, we represent something bigger than ourselves," she said, before adding that the onus is on the current council members to leave behind a stronger institution than the one they found.

The National Council was inaugurated on 23 February 1993 by founding President Sam Nujoma.

It advises the National Assembly on any required changes to subordinate laws which come from the National Assembly. The National Council can also be tasked by the National Assembly to perform other tasks. — *Namp*



Photo: Henry van Rooi

SILVER JUBILEE... National Council Chairperson Margaret Mensah-Williams and her deputy, Bernard Sibalantani, launch the Profound Legislative Review and Oversight booklet as part of the celebration.

Police suspect conspiracy in robberies

• **PLACIDO HILUKILWA**

THE POLICE suspect that there could be a conspiracy between robbers, bank officials and car dealership workers after two women were robbed in separate incidents while on the way to buy vehicles. Unidentified suspects robbed an unnamed police officer of NS70 000 at the weekend in the Oshana region, while another woman lost NS98 000 on Tuesday last week at Walvis Bay.

Oshana police regional commander, commissioner Rauha Amwele said the police officer had withdrawn the money from the local Bank Windhoek branch moments earlier with the intention of buying a second-hand vehicle from the car dealer.

She explained that an unknown thief snatched the handbag containing the NS70 000 at the entrance of the car dealer at Ondangwa.

The victim was in the company of an unidentified male companion, "possibly her husband", when the incident happened.

"They had just arrived at the car dealer's gate when the thief approached them from behind, and snatched the bag. He jumped into a getaway car—a black Honda sedan without number plates—which promptly sped off from the scene," Amwele said.

She urged those withdrawing large amounts of money to be extra careful, and also requested car dealers to put measures in place to ensure the safety of their customers. The police officer said this was

not the first time that someone was robbed while on the way to buy a car.

"We suspect a criminal conspiracy between criminals and some car dealer employees, and we are looking into this matter," she stated.

In the Walvis Bay incident, a gang of four pounced on an unnamed Okahandja woman (48) when she was about to enter the Jan Japan Motors premises at about 13h30 on Tuesday.

The Erongo regional crime investigations coordinator, deputy commissioner Eustus Likuyu, told *Informante* last week that the gang followed the woman from one of the commercial banks at Walvis Bay to Jan Japan Motors.

"When she was about to enter the business premises, one of the robbers hit her on the right upper arm with an iron bar and snatched the victim's handbag from her with the amount of NS98 000 cash inside," he was quoted as saying.

Likuyu added that the attacker ran away after robbing the woman, and fled in a white Toyota Quest with the fake registration number of N12354WB.

He said two of the gang members – Kristian David (29) and Shikongo Martin (29), both from Ondangwa – were arrested with the help of the public.

The two were arrested while they were trying to board a plane back to Ondangwa.

"The two remaining suspects, who are also from the north, are still on the run, and the search is still on to locate and arrest them," Likuyu said.

'We are underpaid'

• **CHARMAINE NGATJHEUE**

NAMIBIA Qualifications Authority employees have claimed that they are underpaid by the institution while top executives receive high salaries.

They made these claims during a peaceful demonstration at the authority's offices yesterday, where they demanded that the Namibia Qualifications Authority (NQA) increases their salaries for the 2018/19 financial year, and prioritise their housing demands.

The employees further alleged that they are being abused and made to do double work in positions they were not originally employed in.

Reading the petition yesterday in front of NQA deputy chief executive, Asnath Kaperu, was Josef Shonghela, chairperson of the workers' committee.

He said: "The NQA employees are underpaid. This was acknowledged in a meeting with the affected staff members, human resources officials and some management members in March 2017. We, the workers, demand a salary increase and an improvement in the housing benefits from the current 21%. We also demand that the increment which was offered in the negotiations be withdrawn."

Shonghela added that some employees are being secretly promoted, even though they do not have the

right qualifications, while other employees are not given a fair chance to apply for vacant positions.

"The fair chance is only given to outsiders, and a few employees from within. By the way, why is the NQA recruiting new staff when there are severe budget cuts? This is especially in higher positions that costs the company more money."

Shonghela further stressed that employees also want to see career growth while at the NQA, but currently, they are stagnant in the same positions.

"Most employees are demotivated and discouraged. There is a lot of exploitation and abuse of power, as well as poor leadership and management. Salaries at the NQA are not properly aligned, as new employees are paid more than those who have been long at the NQA. For many years, salary increments which have been applied across the board only benefited the executive management, who already earn high salaries," he reiterated.

He further claimed that some management members' salaries were recently increased without council's approval, and "the Anti-Corruption

Commission should investigate these irregularities, and the lack of transparency."

He further made reference to a PricewaterhouseCoopers report, which the petitioners alleged had been changed to benefit executives, as opposed to having a structure that will grow the careers of all the employees.

"The report also revealed that executives are overpaid, and that top management also gets a 13th cheque," Shonghela added.

Kaperu, who received the

petition, said the company takes into consideration on the demands of the employees, and will give the petition to the right parties who need to act on it.

"Thank you for the way in which you conducted this demonstration, it was indeed peaceful. We shall look into the demands, but in the meantime, you can go back and work hard, like you always do," she urged.

TENDER
OPE/10/2019

REQUEST FOR THE SYSTEM CONSULTANCY SERVICES TO ALIGN THE OPE SHE (SAFETY) POLICY WITH THE NOSA CM B253 SAFETY SYSTEM AND OTHER RELATED TASKS

Closing date: 07 September 2018
Bidding meeting: See conditions of bid for invitation to bid for the tender
Document fee: N\$ 100 (non-refundable)
Enquiries: Mr. Leon Fourie (061) 264 81 532 or +264 81 220 229
Facsimile: +264 81 220 228

Documents to be sealed and submitted to: **ENQ/NO/CM/10/2019** addressed to the Chairperson of the Tender Committee must be placed in the letter box of the Oshikoto Premier Electric, Level 10/11, at the premises of the Oshikoto Premier Electric, PO Box 1084, Oshana, to arrive on or before 15:00 on 07 SEPTEMBER 2018.

Please note that failed or unsealed documents as well as documents received after the specified closing date and time will be considered as void.

NOTICE OF ENVIRONMENTAL ASSESSMENT & PUBLIC PARTICIPATION PROCESS

IRRIGATION SCHEME ON FARM URIS 481 OSHIKOTO REGION, NAMIBIA

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Environmental Assessment Practitioner: Environmental Compliance Consultancy
Location: Oshikoto Region, Namibia.

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E-mail: info@eccenvironmental.com
Website: <http://www.eccenvironmental.com>
Project ID: ECC-79-165

Citizens must hold government accountable

NAMIBIAN WOMEN LEAD IN GOVERNANCE

WITH regard to governance, Namibia is leading the way in the representation of women in local government, moving up from 42% to 48% in the past nine years. In contrast, only 6% of women are in government in DRC, reflecting the lowest representation in the region.

Zorena Jantze

This is according to the newly launched SADC Gender Protocol Barometer. The barometer further reported that seven SADC countries, namely, Botswana, Zimbabwe, eSwatini, Malawi, Madagascar, Zambia and the DRC have less than 20% women in local government.

SADC countries with elected local government failed to reach the 50% target, the report indicates, and

only Namibia is close to reaching the set target. Furthermore, at 53%, the difference between women and men's average earnings is highest in Swaziland.

The report further stated that 61% of women in Tanzania are living with HIV/Aids, making it the highest in the region, while the lowest is Mauritius with 28% of women living with HIV/Aids.

The barometer also found that South Africa has the highest percentage of women in defence (30%), while DRC

is the lowest with 3% of women in defence.

Speaking at the launch of the SADC Gender Protocol Barometer on Monday, the SADC Gender Links CEO, Colleen Lowe Morna, said the SADC Gender and Development Index (SGDI) went down from 61% to 59% in this current year.

"This is the tragedy of the work that we are doing. One step forward, two steps backwards," Morna stated.

The SGDI is a mix of empirical data and gender attitude scores drawn from

the Gender Progress Score (GPS), which is one of the monitoring and evaluation tools administered by Gender Links. The Citizen Score Card gives ordinary men and women the opportunity to hold their governments accountable.

Officially launching the document, the Deputy Minister of Gender Equality and Child Welfare, Lucia Witbooi, said Namibia has seen an increase in women representation following the Swapo Party's adoption of 50/50 gender representation. "We also call on other political parties to amend their constitutions so that if they get to parliament both genders are equally represented," said Witbooi.

PG to make decision in Nakale case

Marthina K Mutanga

PAULUS Nakale, the alleged mastermind behind numerous screenshots and videos that went viral depicting a man promising to pay numerous women hefty amounts of money in exchange for sex, will in all probability have to face up to his deeds.

The Namibian Police spokesperson, Deputy Commissioner Edwin Kanguatjivi, confirmed that Nakale's case is in the hands of the police regional commander, and will be sent to the Office of the Prosecutor-General for a decision.

Kanguatjivi admitted that the police did not thoroughly investigate the first charges against Nakale, but that police was now revisiting the old, as well as the new charges.

The victims of the former SRC president of the Polytechnic of Namibia, now called NUST, have expressed disappointment in the police system after the police failed to apprehend their alleged aggressor despite numerous rape charges against him.

Kanguatjivi said he can now confirm that Nakale has three cases from three different women pending against him, including rape, defamation of character and fraud.

One case was registered at the Windhoek police station by a 21-year-old woman who accused Nakale of exposing their conversations during which he promised to buy her a Volkswagen Golf, while a second case was registered in January 2018 at the Wanaheda police station after a 28-year-old teacher from the North accused him of engaging in sex with her under false pretences and raping her during one of their encounters.

Kanguatjivi said the other case of rape and defamation of character was opened at Klein Windhoek after he posted on social media phone conversations and videos of the woman.

Kauta leaves the NAC

Staff Reporter

RODGERS Kauta has resigned as Chairperson of the Board of Namibia Airports Company (NAC) after serving in the position for two years.

The news of his resignation comes fresh on the heels of news that the Acting CEO, Albertus Aochamub, resigned from the position with immediate effect. Lot Haifidi, who is the company's strategic executive for corporate governance, has since been reappointed as Acting CEO.

"I am proud of our collective achievements and significant progress made since our appointment in 2016. I consider constant engagement and consultation with the line ministry (transport) and the Ministry of Public Enterprises essential before initiating and/or taking major board programmes, initiatives and/or decisions, but this view is grievously not a dominant NAC board view," Kauta wrote in a letter addressed to works minister, John Mutorwa.

NAC has been marred with corruption allegations within its management. Former Chief Executive Officer, Tamer El-Kallawi, and Head of Engineering, Courage Silombela, were suspended for alleged transgressions.

Silombela faces allegations of bribery, negligence, tampering with documents and fraud. The duo's suspension came weeks after the board's announcement to review a contract for phase two renovations at Ondangwa Airport. The first phase cost N\$208 million.



GONE Rodgers Kauta. Photo contributed



WRONGED: Domestic workers at the SADC Summit. Photo contributed

SADC domestic workers meet

Eba Kandovazu

DOMESTIC workers from various Southern African Development Community (SADC) countries met in the capital yesterday to discuss the issues that affect them.

The meeting forms part of the SADC Summit currently being held. The participants, Namibia, Tanzania, Zambia, Zimbabwe, South Africa, Mozambique and Malawi demanded better working conditions and sufficient payment from employers. "Listen to our voices. We have had enough of slavery and it is time our issues are addressed," President of Namibia Domestic and Allied Workers Union, Solomon Hobexab said.

The Domestic Workers Federation President, Myrtle Witbooi, also called on recognition across SADC countries.

"We are now fighting for our rights. Our work is what makes other work possible. When you go to work, it is us who stay at your houses and ensure that all is taken care of. We therefore need to support each other and mobilise the workers," she said.

Hester Stephens from the South African Domestic Service and Allied Workers Union shared the same sentiments.

Last year, the labour ministry announced an increase from N\$1 353,20 to N\$1 502,05 a month for domestic workers, N\$312,30 to N\$346,89 for weekly

pays and N\$62,45 to N\$69,37 for daily workers. Hourly salaries increased from N\$7,80 to N\$8,67.

The Union of Institutional and Household Employees of Namibia (UIHENI), however, demanded an increase amounting to N\$3 500 per month, sparking debate across the country.

The repealed Government Notice No. 257 of 24 December 2014 stipulates that as of October this year, the minimum wage must be increased by 1% plus a percentage equal to the average of the increases in the inflation rates, for the categories food and non-alcoholic beverages and housing, water, electricity, gas and other fuels.

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ENVIRONMENTAL COMPLIANCE CONSULTANCY

NOTICE OF ENVIRONMENTAL ASSESSMENT & PUBLIC PARTICIPATION PROCESS

IRRIGATION SCHEME ON FARM URIS 481 OSHIKOTO REGION, NAMIBIA

Environmental Compliance Consultancy cc (ECC) hereby gives notice to the public that an application for an Environmental Clearance Certificate in accordance with the Environmental Management Act, 2007 will be made as per the following:

Applicant: Three Musketeers Investment (Pty) Ltd
Environmental Assessment Practitioner: Environmental Compliance Consultancy
Location: Oshikoto Region, Namibia.

Project: Proposed irrigation project is located on Farm Uris 48, using excess clean wastewater produced from a neighboring Mine, Oshikoto Region.

Proposed Activity: The proposed project is for the creation of an irrigation scheme using excess clean waste water from a local mine. The proponent shall grow plants and/or produce fresh produce. Activities envisaged during the construction phase include vegetation clearing, construction of a water pipeline, ground preparation and the construction of irrigation infrastructure.

Application for Environmental Clearance Certificate: In terms of the Environmental Management Act, 2007 (No 7 of 2007), ECC on behalf of Three Musketeers Investment (Pty) Ltd is required to submit an application for Environmental Clearance to the Competent Authority and the Ministry of Environment and Tourism for the above-mentioned project.

How you can participate: ECC is undertaking the required environmental assessment and public participation process in accordance with the Act. Interested and affected parties (I&APs) and Stakeholders are required to register for the project at: <http://eccenvironmental.com/project/uris-irrigation-scheme/>.

Purpose of the Review and Comment Period: As part of the public participation process, the purpose of the review and comment period is to present the proposed project and to afford I&APs an opportunity to comment on the project to ensure that all issues and concerns are captured and considered in the assessment.

Review Period: The review and comment period is effective from 9th August 2018 – 30th August 2018.

Contact: Mr J-E Bezuidenhout or Mrs J Mooney
Environmental Compliance Consultancy
Registration Number: CG2013/11404
PO Box 81193, Klein Windhoek
Tel: +264 816 53 1214 or +264 81 653 1214
E-mail: info@eccenvironmental.com
Website: <http://www.eccenvironmental.com>
Project ID: ECC-36-147

ENTERTAINMENT

FENCES to bring the best of Namibian theatre
FAMILY LIFE IN THE EARLY POST-APARTHEID ERA

THE National Theatre of Namibia (NTN) this August is taking audiences through old school streets, portraying family life and the daily trials and tribulations of a young nation recently jettisoned from the taut grasps of the apartheid era.

Zorena Jantze

In its latest premier, the NTN will premiere the gripping drama, FENCES, exploring the themes of race, family relations, and inheritances from past experiences.

The play follows the protagonist, a 53-year-old hardworking man who strives to provide for his family and how he attempts to keep them together, in the face of tensions inherited from the colonial experience.

Written by prominent and award-winning African-American playwright, August Wilson, the play is adapted and directed by Nelago Shilongoh for the Namibian stage.

Shilongoh explained that this adaptation concentrates on contempo-



ART: Nelago Shilongoh.

Photo Contributed

rary Namibian issues and the effects of the colonial experience, particularly the contract labour system, and how it affected the black family dynamic until today.

It further deals with the conflicting views on work, responsibility, dignity, loyalty and ultimate-

ly, dreams the meaning of an envisioned future.

Shilongoh further stated that the production sets to acknowledge a difficult history and grapple with the discussion on the cycles of transgenerational tensions that have to progressively culminate for generations to come.

The play is further assisted in directing by Victoria Naholo, a writer, theatre maker and aspiring filmmaker. The play's choreography is arranged by dancer and choreographer Trixie Munyama, and the dramaturgical process is facilitated by theatre practitioner Ndimoholo Ndihla.

The adaptation features prominent Namibian actors, including David Ndjavera, Sheila Am'gabes, Lucky Pieters, Blessing Mbonambi, Gift Uzera and Lee-andro Neshila. Exploring themes of culture and a Namibian

nation fostered by white control, where the nation is deliberately prevented from coming into being, FENCES resurrects the cultural wasteland of segregation and inequality.

The show includes strong content and is restricted to persons under the age of 14 years. Fences will be on stage on 9 and 10 August 2018, at 19h00 at the NTN's Backstage. Tickets are available from all Computicket outlets nationwide, at N\$100 and N\$60 for pensioners and students. For inquiries please contact the NTN at 061 374 400.



Madala

Etse mense, I seriously don't know what's going on lately. I don't know if it's the winter of wat mara sowaar, a man's body goes through a barrage of changes that one just cannot explain to either yourself or to anyone else out there. I have been the biggest flag bearer of winter my whole life. I just can't stand Namibian summers, dis te blerrie warm. I have always been an ardent gym goer, trained every day and eating right all the time. Being middle-aged is nie 'n grappie sowaar kumukuru tjiri. I sit back and I look at things that I could do with ease a few years ago mara today, sowaar I feel like madala (ou toppie, old man). Yes, I know there are a few guys my age out there reading this article thinking, "Hey Neville, gaan speel ver asseblief"! Mara julle ken mos vir my, I don't care sobiso. There are things that I have easily made peace with in the last couple of months, mara sowaar help re mense ta e ra nangaan!?? You get out of bed in the mornings thinking, "Ai tog, ek wil nog slaap... Can I just have two more hours of sleep." Mara zula moet gezula word, the hustle is on out there vakwetu. Time is not waiting for anyone out there, it's Harambee lets all pull together in one swift calculated direction. Let me tell you how a man's body changes in their 40's!

In my 20's I had so much testosterone, I could fire off a warning shot before I went out on a date. Today a warning shot is all I get left! Bliksem...

My libido feels like a medical aid fund, it has three month waiting period. Fush-eeke man!

I agree with everything my wife proposes in the house, guys if you start doing this dan is jy in jou moer in!

I start listening to Kosmos Radio, Radio Energy is too loud for me.

I am struggling to work off my kapunda the last six months, is it winter fat or my Herero heritage povvi??

Whenever I get into a crowd of chicks, they greet me, "Hallo oom." Mukuru, I'm gonna kill myself!

I walk around with a blikkie Vicks/Zam Buck salb in my pocket, standard practice these days.

My wife starts complaining about my snot sakdoeke, she says ouisie doesn't want to wash them anymore.

Etse ouens, can we please organise a "Mannekamp" somewhere on a mountain to go freely discuss Viagra, Lifebuoy soap and Salusa 45, things that takes us all back to 1992. The year when we could go to the drive-in three times a night...for the same movie!

ENVIRONMENTAL COMPLIANCE CONSULTANCY
NOTICE OF ENVIRONMENTAL ASSESSMENT & PUBLIC PARTICIPATION PROCESS
IRRIGATION SCHEME ON FARM URIS 481 OSHIKOTO REGION, NAMIBIA

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Review Period: The review and comment period is effective from 9th August 2018 – 30th August 2018.

Contact: Mr JS Bruzdenhout or Mrs J Monry
Environmental Compliance Consultancy
Registration Number: CG2013/1464
PO Box 91193, Gato Windhoek
Tel: +264 816 53 1214 or +264 81 653 1214
E-mail: info@eccenvironmental.com
Website: <http://www.eccenvironmental.com>
Project ID: ECC-36-147

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APPENDIX D – ECC CVS



CURRICULUM VITAE

STEPHAN BEZUIDENHOUT



Name of Consultant: Stephan Bezuidenhout
 Position / Profession: Managing Member & Senior Environmental Practitioner
 Date of Birth: 11 April 1989
 Nationality: Namibian
 Professional Memberships: EAPAN, FSC Environmental Chamber, NCE, NCA, N-BiG
 Email: stephan@eccenvironmental.com
 Website: www.eccenvironmental.com
 Contact: +264 81 262 7872

QUALIFICATIONS:

University of Pretoria:	2011 – 2012	Postgraduate Degree in Environmental Management and Analysis
University of Stellenbosch:	2007 – 2010	Bachelor of Applied Science

PROFILE:

ECC's proudly Namibian Principal leads the ECC team as the lead Environmental Practitioner with a strong and dedicated environmental background. Mr Bezuidenhout has leading practical experience in Identifying and applying legislative requirements to proposed projects. Identifying impacts and mitigations for projects within different sectors, including mining, energy, agriculture and construction.

KEY AREAS OF EXPERTISE:

Agriculture and Ecology	-	Aftercare, rehabilitation & restoration methodology & implementation Forest Stewardship Council (FSC) implementation and compliance
Environmental (and social) Impact Assessments (EIAs) (ESIAs) & Environmental Management	-	Compiling EIA Reports and EMPs Coordinate and review specialist studies Review EIA reports Environmental Management Systems (EMS) Public Participation & Stakeholder Management
Project Management	-	Management of teams through Southern Africa for various projects

LANGUAGES:

	Read	Write	Speak
English	Excellent	Excellent	Excellent
Afrikaans	Excellent	Excellent	Excellent

Stephan Bezuidenhout
Curriculum Vitae

1

Environmental Compliance Consultancy
ECC



SUMMARY OF EXPERIENCE AND CAPABILITY:

Since 2010, Stephan has been working as an environmental assessment practitioner. Stephan has a strong ecological background and has gained more than ten years' experience in the environmental industry. As a lead practitioner, Stephan has successfully driven environmental impact assessments and compliance assessments within Southern Africa. His hands on and practical experience and knowledge of international standards, such as FSC, IFC and World Bank standards allows Stephan to advise his clients and teams constructively and effectively.

PROJECT EXPERIENCE

PROJECT	DATE	ROLE
Best Practice Guide: Environmental Principles for Mining in Namibia	2017 - 2019	Team member
The FSC National Forest Stewardship Standard of Namibia	(2018-2020)	Part of the working group who compiled the National Standard for Forest Stewardship Council (FSC) in Namibia allowing for a higher rate of certification and improved compliance.
Jumbo Charcoal FSC Group Scheme Management	2015 - 2020	Jumbo Charcoal FSC Group Scheme Management
Biophysical Rehabilitation Plan for ML 42, 43, 44 and 45 as well as an overarching 5-year Biophysical Rehabilitation Plan for Namdeb	2018 - 2019	Part of the ECC team who completed the reporting and aided in the implementation of the Biophysical Rehabilitation Plans for Namdeb.
ESIA amendment for B2Gold Namibia Mining Licence (ML 169) to developed underground working for the Otjikoto (gold mine)	2018 - 2019	Lead Environmental Assessment Practitioner managing the EIA process (including stakeholder engagement, PPP and report review).
Kunene Regional Counsel sustainable water supply Pipeline and Ancillary works	2017 - 2018	Lead Environmental Assessment Practitioner managing the EIA process (including stakeholder engagement, PPP and report review).
ESIA application for B2Gold Namibia 10.8 megawatt PV solar upgrade to the B2Gold Power Plant	2017 - 2018	Lead Environmental Assessment Practitioner managing the EIA process (including stakeholder engagement, PPP and report review).
ESIA application for Otjiwarongo Wastewater Treatment and Bulk Water Supply	2019	Lead Environmental Assessment Practitioner managing the EIA process (including stakeholder engagement, PPP and report review).
ESIA for the Wastewater Treatment facilities for Gondwanan Collection	2019	Lead Environmental Assessment Practitioner managing the EIA process (including stakeholder engagement, PPP and report review).
MAWF permit application for Water Abstraction and Discharge for Gondwanan Collection	2019	Lead Environmental Assessment Practitioner managing the EIA process (including stakeholder engagement, PPP and report review).
EIA application for various exploration activities for Votorantim Metals Namibia Pty Ltd	2018 - Present	Lead Environmental Assessment Practitioner managing the EIA process (including stakeholder engagement, PPP and report review).

Stephan Bezuidenhout
Curriculum Vitae

Environmental Compliance Consultancy
ECC



Abengoa Solar SA, Kaxu Solar One 100MW Concentrating Solar Plants (CSP) Trough	2015 - 2017	Environmental Control Officer during commissioning and rehabilitation phases
Konkoonsies II PV Solar Energy Facility, On-site substation and a 132kV power line Northern Cape, South Africa	2015 - 2017	Environmental Assessment Practitioner during EIA process
Abengoa Solar SA Paulputs CSP (Pty) Ltd. 150 MW CSP Trough Northern Cape, South Africa	2015 - 2017	Environmental Assessment Practitioner during EIA Process
Abengoa Solar SA, Xina Solar One 200 MW CSP Trough Northern Cape, South Africa	2015 - 2017	Environmental Control Officer during construction phase
Soil Remediation and Commissioning report of NGALA Camp for Isondlo Project Support (IPS) (Pty) Ltd Gauteng, South Africa	2015	Lead consultant and project manager.
375 km 26-inch natural gas installation for SASOL & ROMPCO Mozambique representing Worley Parsons (Pty) LTD. South Africa	2013 - 2015	Environmental Coordinator and Manager
Department of Water Engineering (working on a catchment management project for the Municipality of Stellenbosch)	2011 - 2012	Intern at Aurecon South Africa
Other projects	2011-2020	Stephan has successfully completed various other projects in the sectors of Agriculture, Mining, Energy and Tourism where he acted as the Lead Environmental Assessment Practitioner managing the EIA process (including stakeholder engagement, PPP, and report review).

PUBLICATIONS

N.S., et al., Some ecological side-effects of chemical and physical bush clearing in a southern African rangeland ecosystem, Southern African Journal of Botany (2015), <http://dx.doi.org/10.1016/j.sajb.2015.07.012>

The FSC National Forest Stewardship Standard of Namibia (Draft V 4). Co-authored by S Bezuidenhout, P Cunningham, A Ashby, F Detering, W Enslin & D Honsbein

CERTIFICATION:

I, the undersigned, certify that to the best of my knowledge and belief, these data correctly describe me, my qualifications, and experience.

DATE: 21 / 10 / 2020



FULL NAME OF CONSULTANT

Jacobus Stephanus Bezuidenhout

Stephan Bezuidenhout
Curriculum Vitae

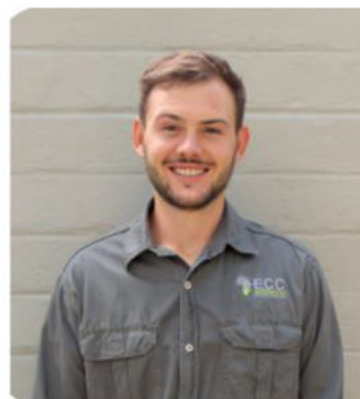
3

Environmental Compliance Consultancy
ECC



CURRICULUM VITAE
Diaan Hoffman

Name of Consultant: Diaan Hoffman
 Position / Profession: Junior Ecologist and emerging Environmental Practitioner
 Date of Birth: 19 May 1996
 Nationality: Namibian
 Professional Memberships: EAPAN No. 213
 Email: diaan@eccenvironmental.com
 Website: www.eccenvironmental.com
 Contact: +264 81 467 4294



QUALIFICATIONS:

University of Stellenbosch: 2015 – 2018 BSc Conservation Ecology

PROFILE:

Highly accomplished professional with experience as an environmental consultant. An out-the-box thinker, passionate about high-quality service in fast-paced environments. Excellent planning and execution ability, able to lead and collaborate with teams to deliver beyond expectations.

KEY AREAS OF EXPERTISE:

Environmental (and social) Impact Assessments (EIAs) (ESIAs)	-	Compiling EIA Reports and EMPs Public Participation & Stakeholder Management
Conservation		Small mammal sampling and parasite analysis. In-depth knowledge of biodiversity and Ecology.

LANGUAGES:

	Read	Write	Speak
English	Excellent	Excellent	Excellent
Afrikaans	Excellent	Excellent	Excellent

SUMMARY OF EXPERIENCE AND CAPABILITY:

Since 2019, Diaan has been working as an environmental assessment practitioner. In 2021 he started working as a junior ecologist assisting with the rangeland management and the FSC standard in Namibia. Diaan has a good biodiversity and ecology background.

PROJECT EXPERIENCE

PROJECT	DATE	ROLE
ENAEX EIA: Assisting with application for Environmental Clearance Certificate (ECC)	2019 - 2020	Team member
Bulk Mining Explosives: Updating EMP and application for renewal of ECC.	2019-2020	Team member
Sand Miners Association: Assisting with the writing of the EIA, EMP and creating of Maps	2019 - 2020	Team member
Okapana (TOTAL) Service Station CC: Conducting and assisting with the whole EIA process.	2019 - 2020	Team member
Walvis Bay Salt Refiners: Measuring Environmental Noise and assisting with the report writing.	2019-2020	Team member
Jumbo Charcoal FSC Group Scheme management.	2021	Team member
Jumbo Charcoal: writing of EMP	2021	Team member
EMCON: Creating Maps and Baseline sections for ESIA	2021	Team member
Nexus Charcoal: Conducting and assisting with the whole ESIA process.	2021	Team member
Etosha Charcoal: writing of EMP	2021	Team member
FSC Mapping and rangeland management	2021	Team member
GIS Mapping: Using QGIS to produce maps for various projects.	2021	Team member
Uis Afriritn EPLs: Conducting and assisting with the whole ESIA process.	2021	Team member
Paratus ESIA: Conducting and assisting with the whole ESIA process.	2021	Team member
Gmundner ESIA: Conducting and assisting with the whole ESIA process.	2021 -Present	Team member
!Uris Amendment: Conducting and assisting with the Amendment	2021 -Present	Team member

CERTIFICATION:

I, the undersigned, certify that to the best of my knowledge and belief, these data correctly describe me, my qualifications, and experience.

DATE: 19/08/2021



Diaan Philip Hoffman



CURRICULUM VITAE
LESTER HARKER

Name of Consultant: Lester Harker
 Position / Profession: Environmental Assessment Practitioner
 Date of Birth: 26 February 1988
 Nationality: Namibian
 Email: lester@eccenvironmental.com
 Website: www.eccenvironmental.com
 Contact: +264 81 602 2082

 **TERTIARY EDUCATION:**

University of Stellenbosch: 2006 – 2010 Bachelor of Arts (Environment and Development - attended)

PROFILE:

Lester works as an Environmental Assessment Practitioner with a diverse environmental background. Mr Harker has leading practice experience in fields of construction, exploration, monitoring and audit compliance and consultancy obtained from leading professionals.

KEY AREAS OF EXPERTISE:

Environmental Management	-	Project Management
Environmental (and social) Impact Assessments (EIAs)	-	Conducting and managing various small to large scale EIAs Compiling EIA Reports and EMPs Coordinate and review specialist studies
Environmental & Social Compliance reporting	-	Environmental and Social compliance audits in the construction industry



LANGUAGES:

	Read	Write	Speak
English	Excellent	Excellent	Excellent
Afrikaans	Excellent	Excellent	Excellent



SUMMARY OF EXPERIENCE AND CAPABILITY:

Has over 9 years of work experience. His first three years were as a junior environmental assessment practitioner, but already became involved with the holistic management of EIA

projects. The following 5 years he has worked in the environmental management field with experience in Environmental Impact Assessments (EIAs), compliance monitoring and auditing in Namibia, the DRC and Equatorial Guinea. Has above average experience in successful client relations.

PROJECT EXPERIENCE

PROJECT	DATE	ROLE
Collaborated with the British CRIDF donor organisation to conduct a high level environmental investigation to determine the feasibility of treating and reusing the Rehoboth Wastewater facility for agricultural purposes	2015	Environmental Assessment Practitioner
Environmental scoping and impact assessment for exploration activities for Westrine Mining & Exploration Company (Pty) Ltd	2016	Environmental Assessment Practitioner.
Conducted an Environmental Scoping and Impact Assessment for the construction of a cement mining and processing facility in Equatorial Guinea, North Africa, for N.B.L.E Sa.	2016	Environmental Assessment Practitioner.
Conducted an environmental impact assessment for the Dauremas Mineral Development Company for exploration and proposed mining activities, Kunene Region.	2015-2017	Environmental Assessment Practitioner.
Conducted an Environmental Impact Assessment for a terrestrial diamond exploration project south of Aus, Karas Region for Hallie Investment Number 14.	2017	Environmental Assessment Practitioner.
Conducted an environmental performance audit in collaboration with a British firm for a copper and cobalt processing facility for the Somika Sarl Group of Companies operating in the DRC to fund the expansion of their processing facility.	2018	Environmental Assessment Practitioner
Projects Completed while at ECC		
Environmental impact assessment for a pilot sustainable water supply project by means of desalination, powered by solar to supplement water supply for Walvis Bay Erongo Region, Namibia	2020	Environmental Assessment Practitioner
Amendment application for the Palmwag Lodge, Gondwana Namibia.	2020	Environmental Assessment Practitioner
Environmental Assessment for the proposed development of residential, retail including tourism activities on Erf 4747, Swakopmund Namibia.	2020	Lead Environmental Assessment Practitioner managing the EIA process (including stakeholder engagement and PPP.
Environmental scoping and impact assessment for the proposed exploration activities on 19 EPLs in the Omaheke and Khomas regions for Kuiseb Copper Company (Pty)Ld	2020	Lead Environmental Assessment Practitioner managing the EIA process (including stakeholder engagement and PPP.
Environmental assessment for proposed exploration activities on EPL 7769 for Jin Peng	2020	Lead Environmental Assessment Practitioner managing the EIA process
Lester Harker Curriculum Vitae	2	Environmental Compliance Consultancy ECC

Environmental clearance application for a combined amendment and renewal for the !Uris and Bobos irrigation scheme on farm Uris 481 and Bobos 544, Oshikoto Region, Namibia

Three Musketeers Investment (Pty) Ltd

Investments (Pty) Ltd		(including stakeholder engagement and PPP.
Environmental assessment for the proposed exploration activities on EPL 7688	2020	Lead Environmental Assessment Practitioner managing the EIA process (including stakeholder engagement and PPP.
Environmental and social compliance audit for 21 sites across Namibia under the Education, Training and Quality Improvement Project funded by the African Development Bank	2020	Site audits and development of an audit report and corrective action plan
Environmental Management Plan for an existing charcoal production and storage plant in Outjo, Namibia	2020	Environmental Assessment Practitioner
Environmental and social impact assessment for the proposed biomass processing (Retort System), storage and packaging plant on farm Gai//Khaisa no. 159, Otjozondjupa Region, Namibia.	2020	Environmental Assessment Practitioner
Environmental Management Plan for the proposed mechanised bush thinning operations on farm Gai//Khaisa no. 159, Otjozondjupa Region, Namibia	2020	Environmental Assessment Practitioner
Environmental and social impact assessment for the proposed quarrying activities for dimension stones on mining claims 72236, 72237, 72238, 72239 and 72240, Hardap Region, Namibia	2021	Environmental Assessment Practitioner
Environmental and social impact assessment for the proposed exploration activities on EPLs 7212, 7789, 7964, 7970, 7971, 7972 and 7994 in the Kunene, Otjozondjupa and Khomas regions	2021	Environmental Assessment Practitioner
Environmental and social impact assessment for the airborne electromagnetic surveys across portions within several EPLs in the Omaheke and Khomas regions for Kuseb Copper Company (Pty) Ltd	2021	Environmental Assessment Practitioner

Lester Harker
Curriculum Vitae

3

Environmental Compliance Consultancy
ECC



Submitted to: Three Musketeers Investments (Pty) Ltd
Attention: Mr Andre Neethling
PO Box 1321
Tsumeb, Namibia

REPORT ON:

ENVIRONMENTAL MANAGEMENT PLAN FOR THE AMENDMENT AND RENEWAL APPLICATION FOR THE !URIS AND BOBOS IRRIGATION SCHEME, OSHIKOTO REGION, NAMIBIA

PROJECT NUMBER: ECC-80-373-REP-04-D

REPORT VERSION: REV 01

DATE: MAY 2022

TITLE AND APPROVAL PAGE

Project Name:	Environmental management plan for the amendment and renewal application for the !Uris and Bobos irrigation scheme, Oshikoto Region, Namibia
Client Company Name:	Three Musketeers Investments (Pty) Ltd
Client Name:	Mr Andre Neethling
Ministry Reference:	APP - 003390
Authors:	Diaan Hoffman, Monique Jarrett, Lester Harker and Stephan Bezuidenhout
Status of Report:	Final submitted to MEFT /Rev 01
Project Number:	ECC-80-373-REP-04-D
Date of issue:	May 2022
Review Period	NA

ENVIRONMENTAL COMPLIANCE CONSULTANCY CONTACT DETAILS:

We welcome any enquiries regarding this document and its content. Please contact:



Environmental Compliance Consultancy
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Tel: +264 81 669 7608
Email: info@eccenvironmental.com

DISCLAIMER

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DEFINITIONS AND ABBREVIATIONS

ABBREVIATIONS	DESCRIPTION
ECC	Environmental Compliance Consultancy
EIA	Environmental Impact Assessment
EMA	Environmental Management Act, 2007
EMP	Environmental Management Plan
IFC	International Finance Corporation
MAWLR	Ministry of Agriculture, Water and Land Reform
MEFT	Ministry of Environment Forestry and Tourism
MME	Ministry of Mines and Energy
PM	Project Manager

1 INTRODUCTION

1.1 BACKGROUND ON THE PROPOSED PROJECT

Environmental Compliance Consultancy (ECC) has been engaged by the Proponent, Three Musketeers Investment (Pty) Ltd, to apply for an amendment of their existing environmental assessment process and develop a scoping report and an environmental management plan (EMP) in terms of the Environmental Management Act, No. 7 of 2007 and its regulations. An amendment and renewal environmental clearance application will be submitted to the relevant competent authority for a record of decision: The Ministry of Environment, Forestry and Tourism (MEFT).

The Proponent intends to divide the current 500ha irrigation Project on farm Uris known as the !Uris irrigation scheme (hereinafter referred to as "The Project") into four 125ha portions. Each portion will be established on four individually owned farms. However, the current amendment and simultaneous renewal only cover three of the four farms. The fourth farm is reserved as a future site and that farm owner/investor will be responsible to conduct their own ESIA.

The Project is located approximately 23km west of Tsumeb. This EMP includes three of the four farms, of which two farm portions fall on farm Uris 481 and one farm portion lies to the south of farm Uris on farm Bobos 544.

1.2 ENVIRONMENTAL REGULATORY REQUIREMENTS

This EMP has been developed by following the requirements of the Environmental Management Act, No. 7 of 2007 and its regulations and satisfies the requirements for an amendment and renewal application.

Legislation that should be adhered to is contained in Table 1.

Table 1 - Applicable laws, regulations and best practice methods

National regulatory regime	Relevance to the project
Constitution of the Republic of Namibia of 1990	Social protection
The Fertilizers, Farm Feeds, Agricultural Remedies and Stock Remedies Act (Act 36 of 1947) and amendments	Social and Biophysical protection
Environmental Management Act, No. 7 of 2007 and its regulations, including the Environmental Impact Assessment Regulations, No. 30 of 2012	Environmental Management
Soil Conservation Act, No. 76 of 1969 and the Soil Conservation Amendment Act, No. 38 of 1971	Biophysical protection
Water Act, Act 54 of 1956	Water source protection
The Forestry Act, No. 12 of 2001 as amended by the Forest Amendment Act, No. 13 of 2005	Vegetation protection
Nature Conservation Ordinance Act, No. 4 of 1975 and its regulations.	Conservation and protection of wildlife
Labour Act, No. 11 of 2007: Regulations relating to the Health and Safety of Employees at Work (GN 156/1997).	Social Protection
Minerals (Prospecting and Mining) Act 33 of 1992 sections 50 and 52	Biophysical and social protection
Nature Conservation Ordinance Act No. 4 of 1975 and its regulations.	Biodiversity protection
Labour Act, No. 11 of 2007 and regulations relating to the Health and Safety of Employees at Work (No. 156 of 1997)	Social protection
National Heritage Act, No. 27 of 2004.	Heritage protection
Draft Pollution Control; and Waste Management Bill (1999)	Biophysical landscape protection
Hazardous Substances Ordinance Ordinance No. 14 of 1974	Biophysical landscape protection

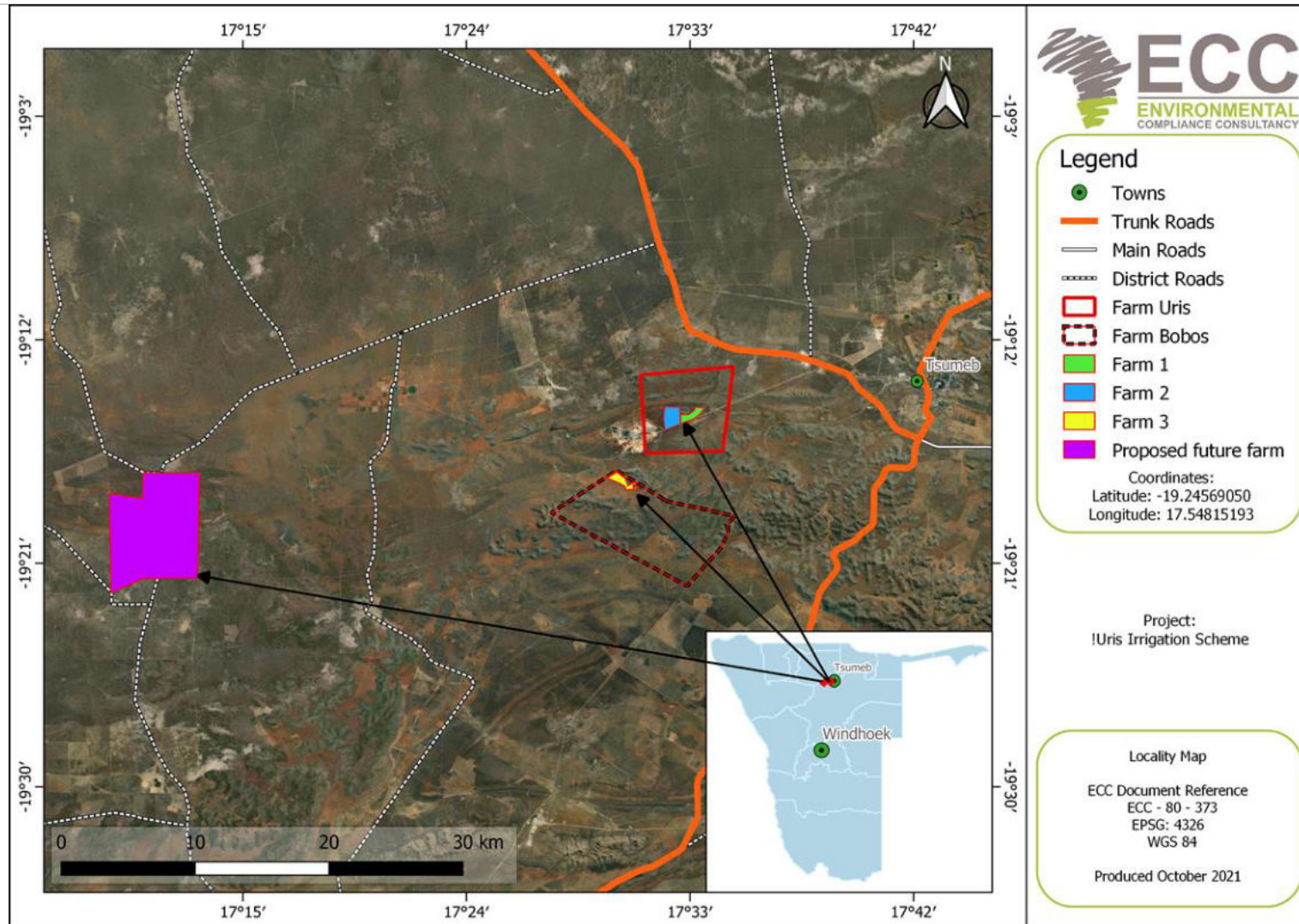


Figure 1 - Location of the proposed irrigation Project

1.3 PURPOSE AND SCOPE OF THIS REPORT

This EMP provides a logical framework, proposed mitigation measures and management strategies for the activities associated with the proposed amendment to the irrigation Project, in this way ensuring that the potential environmental and social impacts are mitigated and minimised as far as practically possible and that statutory and other legal obligations are adhered to and fulfilled. Outlined in the EMP are the protocols, procedures and roles and responsibilities to ensure that management arrangements are effectively and appropriately implemented.

This EMP forms an appendix to the environmental scoping report and impact assessment and has been based on the findings of the assessment; therefore, the environmental scoping report should be referred to for further information on the proposed Project, assessment methodology, applicable legislation and assessment findings.

This EMP is a live document and shall be reviewed at predetermined intervals, or updated when the scope of work alters, or when further data or information can be added. All personnel working on the Project will be legally required to comply with the standards set out in this EMP.

The scope of this EMP includes all activities carried out during the construction and operational stages of the Project.

The Proponent shall be responsible for each phase of the Project and the implementation of this EMP. The current understanding of each phase is as follows:

- **Construction phase:** The amendment includes the construction of three water pipelines from the Tschudi copper mine to the three farm portions.
- **Operations phase:** The management of crops, harvesting, pest control, application of fertilisers and the maintenance of irrigation infrastructure.
- **Decommissioning phase:** The decommissioning and rehabilitation plan for the proposed Project is unknown at this stage. Once the Proponent is informed of the time frame of water to be supplied to the site, a rehabilitation or decommissioning plan shall be prepared.

1.4 MANAGEMENT OF THIS EMP

The Proponent will hold the amended environmental clearance certificate for the proposed irrigation Project and shall be responsible for the implementation and management of this EMP. The implementation and management of this EMP and thus the monitoring of compliance shall be undertaken through daily duties and activities, as well as monthly inspections.

This EMP shall be circulated to all contractors and made available on ECC's website.

1.5 LIMITATIONS, UNCERTAINTIES AND ASSUMPTIONS OF THIS EMP

This EMP does not include measures for compliance with statutory occupational health and safety requirements. This will be provided in the safety management plan to be developed by the Proponent independently.

Where there is any conflict between the provisions of this EMP and any contractor's obligations under their respective contracts, including statutory requirements (such as licences, Project approval conditions, permits, standards, guidelines and relevant laws), the contract and statutory requirements are to take precedence.

The information contained in this EMP has been based on the Project description as provided in the environmental scoping report. Where the Project methods alter, this EMP may require updating and potential further assessment undertaken.

1.6 ENVIRONMENTAL COMPLIANCE CONSULTANCY

Environmental Compliance Consultancy (ECC), a Namibian consultancy with registration number CC/2013/11401, has prepared this document on behalf of the Proponent. ECC operates exclusively in the environmental, social, health and safety fields for clients across Southern Africa in the public and private sector. ECC is independent of the Proponent and has no vested or financial interest in the proposed Project except for fair remuneration of professional services rendered.

All compliance and regulatory requirements regarding this document should be forwarded by email or post to the following address:

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2 PROJECT MANAGEMENT PERSONNEL

The Proponent shall provide a Project team to oversee the proposed construction and proposed operational activities, which shall be composed of the Proponent's personnel and contractors. A nominated role shall be identified to ensure the management and implementation of this EMP throughout the Project is carried out, which shall be supported by the Proponent.

2.1 ORGANISATIONAL STRUCTURE, ROLES AND RESPONSIBILITIES

The Proponent shall be responsible for:

- Ensuring all members of the Project team, including contractors, comply with the procedures set out in this EMP;
- Ensuring that all personnel are provided with sufficient training, supervision and instruction to fulfil this requirement;
- Ensuring that any persons allocated specific environmental responsibilities are notified of their appointment and confirm that their responsibilities are clearly understood; and
- Contractors shall be responsible for ensuring and demonstrating that all personnel employed by them are compliant with this EMP and meet the responsibilities listed below.

The key personnel and environmental responsibilities of each role through the Project life are presented in Table 2.

Table 2 - Roles and responsibilities

Role	Responsibilities & duties
Proponent/Farm Owners	<ul style="list-style-type: none"> - Overall responsibility for the implementation and management of this EMP. - Ensure the environmental policy is communicated to all personnel throughout the proposed Project. - Responsible for providing the required resources (including financial and technical) to complete the required tasks.
Project Manager (PM)	<p>The owners of the individual farm portions will be responsible for ensuring compliance with this EMP, including overseeing the construction works, day to day activities during operations and routine and non-routine maintenance works during operations, as well as the decommissioning of the development.</p> <ul style="list-style-type: none"> - Ensuring all personnel are aware of the commitments made in this EMP and any other relevant regulatory requirements applicable to the Project; - Responsible for the management, maintenance and revisions of this EMP, ensuring adequate resources are made available for implementation of this EMP; - Maintain the community issues and concern register and keep records of complaints. - Ensuring all employees and contractors participate in a site Induction process prior to commencing work on the Project; - Maintain up to date register of employees who have completed the site Induction; and - Provisioning of environmental awareness/management training and inductions for all employees; - Ensuring that best environmental practice is undertaken throughout the duration of the Project; - Report any non-compliance or accidents to the Regulatory Authority.
Site Managers / Contractors	<p>Appointed to manage the performance of the construction and operational maintenance activities. Responsible for the implementation of this EMP and ensuring all activities are compliant with this EMP, as well as:</p> <ul style="list-style-type: none"> - Managing the preparation and implementation of method statements for certain activities, ensuring the site manager reviews all method statements and the relevant environmental protocols are incorporated;

Role	Responsibilities & duties
	<ul style="list-style-type: none"> - Reporting any non-compliance or accidents to the project manager; - Ensuring that all staff attend a site induction session before commencement of any work on-site and that they are adequately informed of the requirements of this EMP; - Ensuring that all contract workers, sub-contractors and visitors to the site are conversant with the requirements of this EMP, relevant to their roles on site and adhere to this EMP at all times; and - Receiving, responding to and recording complaints.
Employees / Contractor employees	<p>Responsible for being compliant with this EMP throughout the construction works, in addition to:</p> <ul style="list-style-type: none"> - Ensuring they have undertaken a site induction and are conversant with the requirements of this EMP; - Ensuring appropriate briefings for certain activities have been provided and fully understood; - Adherence to this EMP at all times; - Reporting of any operations and conditions that deviate from the EMP or any non-compliant issues or accidents to the Site Manager/Contractor.

2.2 CONTRACTS

Any contractors hired during the construction works or maintenance activities during the operational phase shall be compliant with this EMP and shall be responsible for the following:

- Undertaking activities in accordance with this EMP as well as relevant policies, procedures, management plans, statutory requirements and contract requirements;
- Implementing appropriate environmental and safety management measures;
- Reporting of environmental issues, including actual or potential environmental incidents and hazards, to the site manager and/or project manager; and
- Ensuring appropriate corrective or remedial action is taken to address all environmental hazards and incidents reported by employees and subcontractors.

2.3 EMPLOYMENT

The Proponent and all contractors shall comply with the requirements of the regulations for Labour, Health and Safety and any amendments to these regulations. The following shall be complied with:

- In liaison with local government, the community, stakeholders and relevant authorities the Proponent shall ensure that local people have access to information about job opportunities and are considered first for construction/maintenance contract employment positions;
- The number of job opportunities shall be made known together with the associated skills and qualifications;
- The maximum length of time the job is likely to last for shall be indicated;
- Foreign workers with no proof of permanent legal residence shall not be hired;
- Every effort shall be made to recruit from the pool of unemployed workers living in the local area; and
- Every employee hired must be provided with a valid employment contract stating, the position hired for and the hourly remuneration offered.

3 COMMUNICATION AND TRAINING

3.1 COMMUNICATIONS

The project manager and site manager shall communicate any environmental issues to the Project team through the following means (as and when required):

- Site induction;
- Internal and external audits and site inspections;
- Toolbox talks, including instruction on incident response procedures; and
- Briefings on key Project-specific environmental issues.

This EMP shall be distributed to the Project team including any contractors and personnel working on the site to ensure that the environmental requirements are adequately communicated. Key activities and environmentally sensitive operations shall be briefed to workers and contractors.

During the construction and operational activities, communication amongst the management team shall include discussing any complaints received and actions to resolve them, any inspections, audits or non-conformance with this EMP and any objectives or target achievements.

3.2 ENVIRONMENTAL EMERGENCY AND RESPONSE

The PM will be the primary contact person in the event of an environmental emergency. The project manager has the authority and independence to request reasonable steps be taken to avoid or minimise unintended or adverse environmental impacts and failing the effectiveness of such steps, to direct that relevant actions be ceased immediately should an adverse environmental impact be anticipated.

In the event of an incident that requires emergency services, the following services should be contacted, presented in Table 3.

Table 3 - Emergency contact details

Town	Ambulance	Police	Fire brigade
Tsumeb	+264 (67) 22-1082	+264 (67) 1-0111	+264 (67) 22-1004

For large-scale spills (greater than 200 litres) and other significant environmental incidents, the fire services should be contacted as required and the MEFT office informed of the incident (telephone +264 61 284 2111) as well as the MME by completing form PP/11. All correspondence with MEFT/MME should be undertaken by the general manager as guided by the project manager.

3.3 COMPLAINTS HANDLING AND RECORDING

The Proponent shall maintain a complaint's register that will detail the name and contact details of the complainant, the date and time of the complaint, the nature of the complaint, the appropriate action is taken to resolve issues and the date of complaint handover. The Proponent shall be responsible for nominating the correct personnel to coordinate and resolve the issue. Any complaints received verbally shall be recorded as per above and the information shall be given to the Proponent, who is responsible for the management of complaints and will provide a written response to the complainant.

The workforce shall be informed about the complaints register, its location and the person responsible, to refer residents or the general public who wish to lodge a complaint. The complainant shall be informed in writing of the results of the investigation and action to be taken to rectify or address the matter(s). Where no action is taken, the reasons why are to be recorded in the register.

The complaints register shall be kept for the facility and will be available for government or public review upon request.

3.4 TRAINING AND AWARENESS

All personnel working on the Project shall be competent to perform tasks that have the potential to cause an environmental impact. Competence is defined in terms of appropriate education, training, and experience.

3.4.1 SITE INDUCTION

All personnel involved in the Project shall be inducted to the site with a specific environment and social awareness training component. The environment and social awareness training shall ensure that personnel are familiar with the principles of this EMP, the environment and social aspects and impacts associated with their activities, the procedures in place to control these impacts and the consequences of departure from these procedures. The Proponent shall ensure a register of completed training is maintained.

The site induction should include, but not be limited to the following:

- A general site-specific induction that outlines:
 - o What is meant by “environment” and “social”;
 - o What are the environmental risks and impacts of operations;
 - o What can be done to mitigate against such impacts; and
 - o Why the environment needs to be protected and conserved.
- The inductee's role and responsibilities concerning implementing the EMP;
- The sites environmental rules;
- Details of how to deal with and who to contact if environmental problems do occur;
- Basic vegetation clearing principles and species ID sheets;
- Focal themes such as compliance, reporting of accidents and incidents, good housekeeping and standard procedures for waste management;
- The potential consequences of non-compliance with this EMP and relevant statutory requirements; and
- The roles of responsible people for the Project.

4 REPORTING, COMPLIANCE AND ENFORCEMENT

4.1 ENVIRONMENTAL INSPECTIONS AND COMPLIANCE MONITORING

4.1.1 SUMMARY OF ENVIRONMENTAL RISKS AND MITIGATION MEASURES

Chapter 5 provides a management plan of environmental impacts and aspects, which identifies mitigation and monitoring measures, as well as roles responsible. This register will be subject to regular review by the project manager and updated when necessary.

The project manager and site manager will use this management plan to undertake monthly inspections (see next section) to ensure the Project is compliant with this EMP.

4.1.2 CONSTRUCTION: ENVIRONMENTAL INSPECTION & COMPLIANCE MONITORING

4.1.2.1 *Daily compliance monitoring*

A copy of this EMP shall be on-site throughout the Project and shall be available upon request. It is the responsibility of the foreman to enforce the provisions of this EMP and ensure this EMP is complied with by all personnel daily throughout the facility. Daily, weekly and monthly inspections will be undertaken. Any environmental problems or impacts identified shall be notified to the foreman and actioned as soon as is reasonably practicable.

4.1.2.2 *Monthly compliance monitoring*

Monthly inspections shall be undertaken by the project manager to check that the standards and procedures set out in this EMP are being complied with and pollution control measures are in place and working correctly. Any non-conformance shall be recorded, including the following details: a brief description of non-conformance, the reason for the non-conformance, the responsible party, the result (consequence), the corrective action taken and any necessary follow up measures required.

4.1.3 OPERATIONS: ENVIRONMENTAL INSPECTIONS & COMPLIANCE MONITORING

Annual inspections of the irrigation system, water pipeline and storage facilities (fertilisers and pesticides) will be managed and undertaken by the project manager. All infrastructure will be inspected to ensure plant and equipment are operating as per specification; no damage has been caused, no leaks or spills have occurred. Any non-conformance shall be recorded, including the following details: a brief description of non-conformance; the reason for the non-conformance; the responsible party; the result (consequence); and the corrective action taken and any necessary follow up measures required.

4.1.4 REPORTING

There shall be a requirement to ensure that any incident or non-compliance, including any environmental issue, failure of equipment or accident, is reported to the general manager.

4.2 RELEVANT PERMITS

4.2.1 ECOLOGY

Article 23 (b) of the Forest Act, 2001 and associated regulations states that the clearing of vegetation on an area of land greater than 15 hectares will require a permit. This will include the removal of any protected or important species. Permits shall be obtained whenever vegetation is cleared and the Proponent shall undertake all activities in line with the conditions stipulated in the permit.

4.2.2 WATER ABSTRACTION

Although the Water Resources Management Act, No. 11 of 2013 is not enforced, it is best practice to adhere to its stipulations while ensuring compliance with the Water Act, No. 54 of 1956, which is maintained still. Currently, the Proponent uses water from existing boreholes, but will also obtain water from the adjacent Tschudi Copper Mine (utilizing their excess water pumped from the mine pit in the dewatering process), once the mine is back in operation.

The Proponent will apply for a secondary licence to abstract water for commercial use as required in terms of the Water Act, No. 54 of 1956 and shall operate by following any conditions stipulated on the licence.

4.3 NON-COMPLIANCE

Where it has been identified that works are not compliant with this EMP, the Proponent shall employ corrective actions so that the works return to being compliant as soon as possible. In instances where the requirements of the EMP are not upheld, a non-conformance and corrective action notice shall be produced. The notice shall be generated during the inspections and the general manager shall be responsible for ensuring a corrective action plan is established and implemented to address the identified shortcoming.

A non-compliance event or situation, for example, is considered if:

- There is evidence of a contravention of this EMP and associated indicators or objectives;
- The site manager and/or contractor have failed to comply with corrective or other instructions issued by the project manager or qualified authority; or
- The site manager and/or contractor fail to respond to complaints from the public.
- Activities shall be stopped in the event of a serious non-compliant event identified until corrective action (s) has been completed.

4.4 INCIDENT REPORTING

The project manager must ensure that an accident and incident (including minor or near-miss) reporting system is maintained by the foreman so that all applicable statutory requirements are covered. For any serious incident involving a fatality, or permanent disability, the incident scene must be left untouched and cordoned off until witnessed by a representative of the police. This requirement does not preclude immediate first aid being administered and the location being made safe.

The project manager and site manager must investigate the cause of all work accidents and significant incidents and must provide the results of the investigation and recommendations on how to prevent a recurrence of such incidents. A formal root-cause investigation process should be followed.

4.4.1 DISCIPLINARY ACTION

This EMP is a legally binding document and non-compliance with it shall result in disciplinary action being taken against the perpetrator(s). Such action may take the form of (but is not limited to):

- Fines/penalties;
- Legal action;
- Monetary penalties imposed by the Proponent on the contractor;
- Withdrawal of licence(s); and
- Suspension of work.

The disciplinary action shall be determined according to the nature and extent of the transgression / non-compliance and penalties are to be weighed against the severity of the incident.

5 ENVIRONMENTAL AND SOCIAL MANAGEMENT

5.1 OBJECTIVES AND TARGETS

Environmental protection is the responsibility of management and if management is environmentally aware, it motivates all employees and their associated business partners, customers and suppliers to think and act in a more environmentally responsible manner. Environmental objectives and targets have been developed so that activities on the proposed site can minimise potential impacts on the environment, as far as reasonably practicable.

Environmental objectives for the Project are as follows:

- Zero pollution incidents;
- Sustainable resource use (water and energy);
- Application of the waste management hierarchy;
- A safe working environment for employees; and
- Use natural resources effectively and efficiently

5.2 MANAGEMENT PLAN OF ENVIRONMENTAL IMPACTS

An environmental review of the proposed Project has been completed to identify all the commitments and agreements made within the environmental scoping report. From this, a schedule of environmental commitments and impacts has been produced (Table 4), which details deliverables including measures identified for the prevention of pollution or damage to the environment during the Project's lifetime.

Table 4 provides a management plan for potential environmental impacts, which identifies mitigation and monitoring measures, as well as the responsible person. This management plan will be subject to regular review by the manager and updated when necessary. The general manager will use this table to undertake monthly inspections to ensure the Project is compliant with this EMP.

Table 4 - Environmental aspects, impacts and mitigation measures

Task activity/ equipment	Impact identified	Mitigation control measures	Monitoring requirements	Responsibility
Job creation, skills development and business opportunities	Beneficial socio-economic impacts on a local and regional scale	<ul style="list-style-type: none"> - Maximise local employment and local business opportunities; - Enhance the use of local labour and local skills as far as reasonably possible; and - Ensure that goods and services are sourced from the local and regional economy as far as reasonably possible. 	Monthly	General manager/Proponent
General construction and operational activities	<ul style="list-style-type: none"> - Odours - Safety - Aerial emissions - Potential loss of oil and fuel causing ground contamination 	<ul style="list-style-type: none"> - Plant and equipment shall be brought onto the site as and when required and stored in specific areas; - Amenities (e.g. portable toilets) shall be provided and set up in a suitable location (if required); - A 'good housekeeping' policy shall be adopted across the farm portions especially with regards to surface infrastructure (sheds, buildings etc.); and - Refuelling of the mobile plant shall be undertaken in a designated area. 	Daily	Project manager
	Dust generation	<ul style="list-style-type: none"> - Use existing access roads and tracks; - Dust suppression using water may be necessary where the ground is to be left fallow during a dry period or where dust generation is profound; - Use of mixed crops, including trees to minimise wind-blown erosion. - Restricted speeds (<30km/hr); and 	Daily	Project manager

Task activity/ equipment	Impact identified	Mitigation control measures	Monitoring requirements	Responsibility
		<ul style="list-style-type: none"> - Provide protective masks and eyeglasses to employees in dusty working environments. 		
	Noise generation	Noise shall be minimised as much as possible during pipeline construction works. The following measures shall be applied: <ul style="list-style-type: none"> - Limit normal operating hours to 07h00 to 18h00 on weekdays and 07h00 until 13h00 on Saturday; - Regular maintenance and servicing of vehicles, plant and equipment; and - All equipment is to be shut down or throttled back between periods of use. 	Daily	Project manager
	Fire management	<ul style="list-style-type: none"> - Development of a fire management system through the process of risk identification and assessment; - Developing site-specific work procedures as part of the fire management system; - Induction on fire prevention and toolbox talks; - Control and reduce the potential risk of fire by segregating and safe storage of flammable materials; - Avoid potential sources of ignition for example, by prohibiting smoking in and around areas where chemicals/fuel is stored; 	Daily	Employees

Task activity/ equipment	Impact identified	Mitigation control measures	Monitoring requirements	Responsibility
		<ul style="list-style-type: none"> - Ensure suitable fire-extinguishing equipment is accessed immediately and conveniently whenever necessary. This can include pails of water, buckets of sand, or portable extinguishers; - For field fires, appropriate fire fighting equipment should be available on-site; - Emergency contact details should be readily available on-site; - Ensure key personnel are trained to manage an emergency fire situation. 		
Vegetation	<ul style="list-style-type: none"> - Alien species 	<ul style="list-style-type: none"> - Ensure the correct removal of alien invasive vegetation from the farm portions and prevent the establishment and spread of alien invasive plants due to the operational activities; - Ensure the potential introduction and spread of alien plants is prevented; and - All Project or earth moving equipment must have an internal weed and seed inspection completed prior to equipment being used on site. 	Monitor daily the removal of the alien invasive vegetation. Check the tyre of vehicles after use on-site.	Project manager

Task activity/ equipment	Impact identified	Mitigation control measures	Monitoring requirements	Responsibility
	<ul style="list-style-type: none"> - Removal of vegetation - Loss of flora and fauna, protected/important species - Dust generation 	<ul style="list-style-type: none"> - Use existing tracks where possible; - Identify and mark important tree species and clearly highlight them to construction workers so that they are avoided; - Apply speed restrictions; - Avoid off-road driving; - Access tracks should be wider than normal to accommodate equipment; and - Apply speed restrictions. 	Daily visual inspection during construction of new access tracks/widening	Employees
Biodiversity encounters	The possible encountering of wildlife on-site	<p>The Nature Conservation Ordinance Act No. 4 of 1975 and its regulations, Controlled Wildlife Products and Trade Act 9 of 2008 and the Animals Protection Act 71 of 1962 should be closely followed with regards to any encounters with wildlife within farm boundaries.</p> <ul style="list-style-type: none"> - No living organism should be removed from the site by anyone other than by a professional/registered animal handler, pest control company, SPCA, MEFT/MAWLR or relevant rehabilitation or wildlife organisations; 	Daily, weekly	Employees

Task activity/ equipment	Impact identified	Mitigation control measures	Monitoring requirements	Responsibility
		<ul style="list-style-type: none"> - No living organism shall be poached/consumed/harmed or killed for illegal purposes (i.e., illicit trade of pangolins for scales); - Police and MEFT should be notified of any poaching incident involving sensitive or protected species or if such an animal is found on someone within or surrounding farm boundary; - If snares or poaching equipment is found in the field it should be removed and destroyed; - Fences and farms should be monitored for potential snares and traps; - Wildlife encountered on farm should be ethically treated; - Nests discovered on infrastructure within farm boundaries should not be removed or destroyed if it is not clear that there are no eggs or chicks in the nests; - Nests/eggs/birds should be identified by a professional and action could be taken depending on advice or instruction given by the professional; - Pesticides and herbicides should not be used as far as reasonably possible; 		

Task activity/ equipment	Impact identified	Mitigation control measures	Monitoring requirements	Responsibility
		<ul style="list-style-type: none"> - If there is no other possibility the relevant pesticides/herbicides/chemicals should be used by a professional/registered pest control company and the MSDS of the substance used should be closely followed; - Invasive plant species should be removed and their spread should be prevented; and - Waste on-site should be well managed and removed from the site to prevent animals (i.e. rodents, snakes, scorpions etc) from breeding/living on-site. 		
Biodiversity	Construction and installation of the pipeline infrastructure	<ul style="list-style-type: none"> - Holes excavated for the pipelines should be covered during the night or during periods of no construction. - Construction vehicles should not drive into the field; - Construction vehicles should be on the lookout for slow-moving animals to avoid killing or harming them; - Vehicles should stay on the existing roads as far as possible; and - Prevent the killing of perceived dangerous species (e.g., snakes); collection of veld foods (e.g., giant bullfrog, tortoise, monitor lizard); any form of poaching (e.g., setting of snares for birds and ungulates, etc.). 	Daily	Contractor/Project manager

Task activity/ equipment	Impact identified	Mitigation control measures	Monitoring requirements	Responsibility
Site and Ground Preparation	Potential soil disruption	<ul style="list-style-type: none"> - Specific activities that may generate dust shall be avoided during high wind events, e.g. soil preparation activities; and - Use of mixed crops, including trees to minimise wind-blown erosion. 	Daily	Project manager
Land management	Reduced soil quality (loss of nutrients, use of chemicals)	<ul style="list-style-type: none"> - Ensure land is suitably prepared before planting crops. This may involve the application of fertilisers; - Fertilisers to be applied by following material safety data sheet (MSDS) guidelines for safe application methods and prescribed limits; - Ensure land is suitably prepared before planting crops. - Plant crops suitable to the soil quality, climate and needs as per the Agriculture Study (Smith, 2015) <i>The Agricultural Potential of !Uris</i>; - Apply fertilisers as required and by following legal and safety requirements; - Minimise use of pesticides and insecticides and implement sustainable integrated pest management through the use of physical, chemical, biological and cultural controls; 	Daily	Project Manager

Task activity/ equipment	Impact identified	Mitigation control measures	Monitoring requirements	Responsibility
		<ul style="list-style-type: none"> - Minimise surface runoff during rainfall events through suitable ground management measures such as diversion channels around the field that must be able to deliver the runoff to a stable outlet; - Minimise surface runoff by using any readily available mulching materials e.g straw, grass clippings and wood chips (www.fao.org, n.d.); and - Avoid leaving bare earth for long durations and consider the use of shelterbelts or cover crops during high wind. 		
Operating plant and equipment during pipeline construction phase	<ul style="list-style-type: none"> - Dust generation - Increase in noise levels 	<ul style="list-style-type: none"> - Normal working hours should be restricted between 07:00-18:00 during the week and 07:00-13:00 on Saturdays. No construction work may be conducted on Sundays; - Regular maintenance of plant, equipment and machinery; - Spilled oil should be treated as hazardous waste; and - Drip trays for trucks to avoid oil leakages and to be used when refuelling. 	Daily, weekly	Project Manager Employees (equipment operators)
Harvesting activities	Potential re-establishment of alien plants on site	<ul style="list-style-type: none"> - Ensure the correct removal of alien invasive vegetation from the proposed Project area and prevent the establishment and spread of alien invasive plants; and 	Weekly	Project Manager

Task activity/ equipment	Impact identified	Mitigation control measures	Monitoring requirements	Responsibility
		<ul style="list-style-type: none"> - Ensure compliance with relevant environmental specifications for the control and removal of alien invasive plant species. 		
Resource use	Inefficient use of water	<ul style="list-style-type: none"> - Regularly manage crops, crop areas and irrigation systems to avoid applying water to unplanted areas or applying irrigation when not needed; - Using appropriate irrigation rates and scheduling; - Design the irrigation system for improved irrigation, uniformity and efficiency to reduce runoff and leaching; - Regularly maintain the irrigation system so that it continues to operate efficiently; and - The irrigation method will ensure that maximum water uptake through plant absorption is as effective as possible to ensure minimal water loss through inefficient irrigation processes. 	Check irrigation infrastructure weekly	Project Manager
Use of fertilisers and pesticides	<ul style="list-style-type: none"> - Ground contamination - Ecological effects 	<ul style="list-style-type: none"> - All necessary approvals are in place before bringing fuel, oil or chemicals onto the site; - Fertilisers and pesticides shall be applied if and where necessary and shall be done according to regulations or application instructions; - The use of chemical pesticides shall be avoided and minimized (quantity and frequency); 	Daily observations when fertilisers and pesticides are applied	Project Manager

Task activity/ equipment	Impact identified	Mitigation control measures	Monitoring requirements	Responsibility
		<ul style="list-style-type: none"> - Biological Control Agents (BCA) shall not be used; <ul style="list-style-type: none"> o Arbouricides shall not be sprayed and use shall be avoided where possible; - Monitor areas where chemicals are used. If there is environmental degradation, cease the use of chemicals and liaise with the environmental manager; - Store fuels or chemicals away from surface or groundwater areas; - All chemicals shall be labelled with the correct contents and safety, hazards or handling instructions; - An inventory of chemicals shall be maintained (Chemical Register to be kept); - All primary containers shall be fit for purpose and should not be damaged; - All chemicals should be stored in an area with a contained impermeable surface; - Ensure the storage area is lockable and kept clean and organised; - Locate storage away from surface water and groundwater areas; - Have spill kits available where chemicals are stored and used; - Ensure chemicals are not exposed to heat; and 	<p>Weekly observations to identify any impacts from the use of fertilisers and pesticides.</p>	

Task activity/ equipment	Impact identified	Mitigation control measures	Monitoring requirements	Responsibility
		<ul style="list-style-type: none"> - Storage of fertilisers and fuels together is prohibited. 		
Heritage	Potential heritage discovery	<p>When uncovering archaeological remains the following measures (chance find procedure) shall be applied:</p> <ul style="list-style-type: none"> - Works to cease, area to be demarcated with appropriate tape by the site supervisor and the Site Manager to be informed; - Site Manager to visit the site and determine whether work can proceed without damage to findings, mark exclusions boundary and inform the Project Manager with the GPS position if possible; and - If works cannot proceed without damage to findings, the site manager to inform the Project Manager who will get in touch with an archaeologist who will provide advice. 	Daily	Project Manager
Emergency Incidents	Soil and water contamination due to inadequate control or accidental release of hazardous substances on site	<p>Safe handling of fuel on-site</p> <p>Storage</p> <ul style="list-style-type: none"> - Separate hazardous and non-hazardous chemicals from each other; - Label chemicals appropriately; - Chemicals with different hazard symbols should not be stored together - clear guidance on the compatibility of 	Daily	All staff members

Task activity/ equipment	Impact identified	Mitigation control measures	Monitoring requirements	Responsibility
		<p>different chemicals can be obtained from the Materials Safety Data Sheets (MSDS) which should be readily available;</p> <ul style="list-style-type: none"> – Store chemicals in a dedicated, enclosed and secure facility with a roof and a paved/concrete floor with a bund; – Diesel tanks should be completely contained within secondary containment such as bunding; – Consider the feasibility of substituting hazardous chemicals with less hazardous alternatives; and – Fuels, lubricants and chemicals are to be stored within appropriately sized, impermeable bunds or trays with a capacity not less than 110% of the total volume of products stored. <p>Spills</p> <p>Spill kits with the following items as a minimum should be made available on site:</p> <ul style="list-style-type: none"> – Absorbent materials; – Shovels; – Heavy-duty plastic bags; – Protective clothing (e.g., gloves and overalls); and 		

Task activity/ equipment	Impact identified	Mitigation control measures	Monitoring requirements	Responsibility
		<ul style="list-style-type: none"> – Major servicing of equipment shall be undertaken offsite or within appropriately equipped workshops. <p>Servicing</p> <ul style="list-style-type: none"> – For small repairs and required maintenance activities all reasonable precautions to avoid oil and fuel spills must be taken (e.g., spill trays, impervious sheets); – Provision of adequate and frequent training on spill management, spill response and refuelling must be provided to all onsite staff; – No refuelling is to take place within 50 meters of groundwater boreholes, surface water bodies or streams; – Vehicles and machinery are to be regularly serviced to minimise oil and fuel leaks; and – All major petroleum product spills (spill of more than 200 litres per spill) should be reported to the Ministry of Mines and Energy (MME) on Form PP/11 titled "Reporting of major petroleum product spill". 		

Task activity/ equipment	Impact identified	Mitigation control measures	Monitoring requirements	Responsibility
		<p>The following points, therefore, apply to all areas on the site:</p> <ul style="list-style-type: none"> – Assess the situation for potential hazards; – Do not come into contact with the spilled substance until it has been characterised and necessary personal protective equipment (PPE) is provided; and – Isolate the area as required. <p>The following measures are to be implemented in response to a spill:</p> <ul style="list-style-type: none"> – Spills are to be stopped at the source as soon as possible (e.g., close valve or upright drum); – Spilled material is to be contained to the smallest area possible using a combination of absorbent material, earthen bunds or other containment methods; – Spilled material is to be recovered as soon as possible using appropriate equipment. In most cases, it will be necessary to excavate the underlying soils until clean soils are encountered; 		

Task activity/ equipment	Impact identified	Mitigation control measures	Monitoring requirements	Responsibility
		<ul style="list-style-type: none"> - All contaminated materials recovered after a spill, including soils, absorbent pads and sawdust, are to be disposed of at an appropriately licenced facility for hazardous waste; - A written incident report must be submitted to the general manager. 		
Soil disturbances	Potential soil erosion during heavy precipitation or strong winds within farm boundaries at cleared areas	<ul style="list-style-type: none"> - Indigenous vegetation could be planted to prevent erosion; - Rock beds could also be used to prevent erosion on the gentle slopes around the buildings; and - An erosion control plan could be developed and implemented on-site at areas with steeper slopes. 	Monthly	Project manager/Proponent
	Construction and installation of the pipelines	<ul style="list-style-type: none"> - Holes excavated for the pipelines should preferably be as narrow as possible to avoid unnecessary soil disturbances; - Construction vehicles should stay on existing roads as far as possible to prevent soil compaction in the field; - Vehicles should not drive in the field in wet conditions; and - Pipelines should be effectively buried with the soil excavated and as far as possible represent the ground surface before excavation. 	Daily	Contractor/ Project manager

Task activity/ equipment	Impact identified	Mitigation control measures	Monitoring requirements	Responsibility
Waste management	<ul style="list-style-type: none"> - Nuisances - Land use - Burning of waste (air pollution) 	<ul style="list-style-type: none"> - Training and Toolbox Talks; - Good housekeeping across the site; - All working areas shall apply good housekeeping; - Implement the waste management hierarchy across the site: Avoid, reuse, recycle and then dispose of; - Waste shall be collected from all harvesting areas and brought to a dedicated central waste collection area where it shall be separated. The dedicated central waste area shall be fenced to prevent spreading into the environment and people and animals entering; - Waste storage areas shall be kept clean and tidy at all times; - Waste shall be removed regularly to avoid pests and bad odours; - Only combustible waste shall be burnt. Hazardous waste shall not be burnt; - If required, waste to be burnt shall be dry to reduce the amount of smoke and increase the combustion rate; - Water buckets or other fire control / extinguish methods shall be at the fire pit; 	Daily and weekly	Project Manager Employees

Task activity/ equipment	Impact identified	Mitigation control measures	Monitoring requirements	Responsibility
		<ul style="list-style-type: none"> – Burning takes place only on days when winds are light and blowing away from people; – Waste is burned in manageable volumes, so the fire does not get out of control; – The fire is started, attended and monitored at all times by authorized and qualified personnel. Employees undertaking burning activities shall remain at a safe distance upwind of the fire; – It is unlikely that hazardous material and wastes will be produced, however, if they do, they shall be managed safely and responsibly to prevent contamination of soils, pollution of water and/or harm to people or animals as a result of the use of these materials; and – Hazardous and non-hazardous waste shall be stored separately at all times. 		
	Environmental pollution (littering and poor storage of solid waste)	<ul style="list-style-type: none"> – Waste management should be handled by following the International Finance Corporation (IFC) standards as follows: – Implement a waste management plan (from “cradle to grave” methodology) covering all aspects of waste generated on-site; 	Daily/Weekly	Project Manager Employees

Task activity/ equipment	Impact identified	Mitigation control measures	Monitoring requirements	Responsibility
		<ul style="list-style-type: none"> – Solid waste shall be stored in an appointed area in covered, tip-proof metal drums/skids for collection and disposal to an approved waste management site; – The waste storage areas shall always be kept clean and tidy; – Storage of domestic waste on site may result in the attraction of unwanted scavengers and should be removed as soon as it is feasible; – Return packaging of hazardous and non-hazardous materials (wherever possible), such as empty bags for reuse; – Solid wastes should be deposited/emptied regularly. – See the material safety data sheets available from suppliers for disposal of contaminated products and empty containers; – Liaise with the governing body (municipality/council) regarding the waste and handling of hazardous waste; – Hydrocarbon and chemical contaminated solids have the potential to cause contamination to the soil, ground and or surface water, thus correct storage and disposal methods are required. 		

6 DECOMMISSIONING

Due to the continuous and expected long term duration of the Project uncertainties that exist at this stage for the decommissioning and reinstatement strategy, the following is assumed and recommended:

- The irrigation infrastructure shall be removed and disposed of by following the existing waste management arrangements on site.
- The water pipeline shall either be removed and disposed of in line with the existing waste management arrangements on-site, or shall remain in-situ, and the concrete pipeline shall be broken to avoid hollow spaces and allow material to fill and ground around the disused pipeline.
- The above works shall apply the principles set out in this EMP, which shall be updated with any specific decommissioning or reinstatement activities or noticeable changes from this report, before undertaking the decommissioning works.

7 IMPLEMENTATION OF THE EMP

The proposed irrigation and pipeline construction work will be carried out in compliance with the relevant regulations. Minor to moderate significant impacts are anticipated for the impacts that have been identified and management and mitigation measures are in place for potential risks; which, are also there to eliminate or reduce the severity of potential impacts.

This EMP:

- A. Has been prepared according to a contract with the Proponent;
- B. Has been prepared based on information provided to ECC up to November 2021;
- C. Is for the sole use of the Proponent, for the sole purpose of an EMP;
- D. Must not be used (1) by any person other than the Proponent or (2) for a purpose other than an EMP; and
- E. Must not be copied without the prior written permission of ECC.

ECC has prepared the EMP based on information provided by the Proponent, and the environmental scoping report conducted for Three Musketeers Investments (Pty) Ltd and the proposed irrigation Project.