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Environmental Management Plan for the Proposed Permanent Closure of Portion A of Erf 3127 Kuisebmond as Public Open Space and subsequent conversion/creation of Portion A of Erf 3127 Kuisebmond into a Street and Creation of Portion B of Remainder of Erf 8634 Kuisebmond as Street

EMP

Final

3 March 2022

Municipality of Walvis Bay



GCS Project Number: 21-0304

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Environmental Management Plan

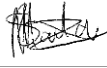

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1 OVERVIEW

1.1 Project Background

The Municipality of Walvis Bay (The Proponent) proposes to permanently close Portion A of Erf 3127 Kuisebmond as a Public Open Space and subsequently convert/create Portion A of Erf 3127 Kuisebmond into a Street. Additionally, the proponent intends to create a street on Portion B of Remainder Erf 8634 Kuisebmond. The locality of the proposed development is shown in Figure 1-1 below.

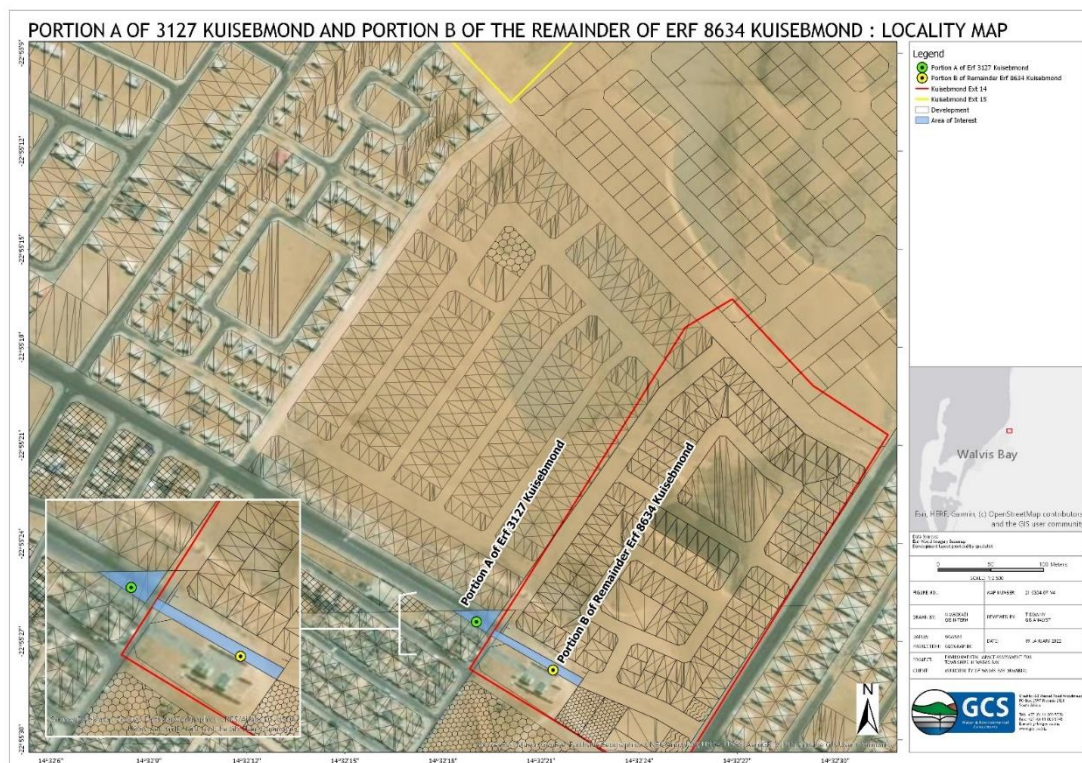


Figure 1-1: Locality map of Portion A of Erf 3127 and Portion B of the Remainder of Erf 8634 Kuisebmond

1.2 Purpose of the EMP

Regulation 8 of the Environmental Management Act's (EMA) (7 of 2007) Environmental Impact Assessment Regulations (2012) requires that a draft Environmental Management Plan (EMP) be included as part of the scoping Environmental Assessment (EA) process. A 'management plan' is defined as:

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

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

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

The following phases are addressed in this EMP:

- **Construction** - the period during which construction possible tarring, maintenance or upgrading of the proposed streets will be ongoing;
- **Operation** - the period during which the streets will be operational.
- **Decommissioning** - The proposed activities are expected to be a permanent activity and is thus not anticipated to be decommissioned in future. As such the decommissioning impacts for the proposed activity is not discussed.

1.3 Environmental Assessment Practitioner (EAP)

GCS Water Environmental Engineering Namibia (Pty) Ltd (“GCS” hereafter) has been appointed by the Municipality of Walvis Bay as independent environmental consultants to conduct the required Environmental Assessment (EA) which includes compiling an EMP for the proposed development. The EMP is to be submitted with the scoping EA report as supporting documents to the application for an Environmental Clearance Certificate (ECC) to the Environmental Commissioner at the Department of Environmental Affairs (DEA) of the Ministry of Environment, Forestry and Tourism (MEFT). The EMP will also be used by Contractors as well as the Proponent in guiding them during the proposed operations to ensure that impacts on the environment are limited or avoided altogether.

1.4 Legal Requirements

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

Table 1-1 below lists the requirements of an EMP as stipulated by Section 8 (j) of the EIA Regulations.

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

Legislation	Permit/Approval/Requirement	Contact Details
Environmental Management Act 2007 Environmental Impact Assessment (EIA) Regulations (EIAR) (GG No. 4878)	Amendments (required every 3 years) to this EMP will require an amendment of the ECC for these developments. Activities listed in Government Notice (GN) No. 29 of GG No. 4878 require an ECC.	Mr Damian Nchindo Department of Environmental Affairs, Ministry of Environment, Forestry and Tourism Tel: 061 284 2701
Water Act 54 of 1956	Prohibits the pollution of underground and surface water bodies (S23 (1)). Liability of clean-up costs after closure/abandonment of an activity (S23 (2)).	Mr Witbooi (Department of Water Affairs): Tel: (061) 208 7226
Water Resources Management Act No.11 of 2013	The act provides for the management, protection, development, use and conservation of water resources; and provides for the regulation and monitoring of water services and to provide for incidental matters. The objects of this Act are to:	

Legislation	Permit/Approval/Requirement	Contact Details
	Ensure that the water resources of Namibia are managed, developed, used, conserved and protected in a manner consistent with, or conducive to, the fundamental principles set out in Section 66 - protection of aquifers, Subsection 1 (d) (iii) provide for preventing the contamination of the aquifer and water pollution control (Section 68).	
Namibia Urban and Regional Planning Act No 5 of 2018	To consolidate the laws relating to urban and regional planning; to provide for a legal framework for spatial planning in Namibia; to provide for principles and standards of spatial planning; to establish the urban and regional planning board; to decentralise certain matters relating to spatial planning; to provide for the preparation, approval and review of the national spatial development framework, regional structure plans and urban structure plans; to provide for the preparation, approval, review and amendment of zoning schemes; to provide for the establishment of townships; to provide for the alteration of boundaries of approved townships, to provide for the disestablishment of approved townships; to provide for the change of name of approved townships; to provide for the subdivision and consolidation of land; to provide for the alteration, suspension and deletion of conditions relating to land; and to provide for incidental matters	Mr Tobias Newaya Ministry of Urban and Rural Development tnewaya@mur.d.gov.na
Roads Ordinance 17 of 1972	<ul style="list-style-type: none"> Section 3.1 deals with width of proclaimed roads and road reserve boundaries 	Ms Elina Lumbu Roads Authority Specialised road Legislation, Advise & Compliance lumbue@ra.org.na

Legislation	Permit/Approval/Requirement	Contact Details
	<ul style="list-style-type: none"> • Section 27.1 is concerned with the control of traffic on urban trunk and main roads • Section 36.1 regulates rails, tracks, bridges, wires, cables, subways or culverts across or under proclaimed roads • Section 37.1 deals with Infringements and obstructions on and interference with proclaimed roads. 	

1.5 Assumptions and Limitations

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

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

1.6 Report Structure

This EMP lays out the management actions for the proposed activities. The EMP addresses the following phases:

- **Construction** - the period during which construction possible tarring, maintenance or upgrading of the proposed streets will be ongoing;
- **Operation** - the period during which the streets will be operational.
- **Decommissioning** - The proposed activities are expected to be a permanent activity and is thus not anticipated to be decommissioned in future. As such the decommissioning impacts for the proposed activity is not discussed.

2 ROLES AND RESPONSIBILITIES

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

- Proponent's Representative
- Environmental Control Officer

2.1 Proponent's Representative

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

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

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

2.2 Environmental Control Officer

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

- Management and facilitation of communication between the Proponent, PR and Interested and Affected Parties (I&APs) with regard to this EMP;
- Conducting site inspections (recommended minimum frequency is monthly during construction and bi-annually during operation) of all areas with respect to the implementation of this EMP
- Monitor and audit the implementation of the EMP and report bi-annually to MEFT:DEA regarding compliance to the EMP;
- Advising the PR on the removal of person(s) and/or equipment not complying with the provisions of this EMP;
- Making recommendations to the PR with respect to the issuing of fines for contraventions of the EMP; and
- Undertaking an annual review of the EMP and recommending additions and/or changes to this document.

3 ENVIRONMENTAL MANAGEMENT PLAN ACTIONS

3.1 Key Potential environmental impacts to be managed

From the EA, the following key potential impacts have been identified per project phase and are summarised in **Table 3-1** below. The full impact description is presented in the tables under subchapter 3.2 to 3.3 as well as in the Scoping Report.

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

	Project Phase	Potential impacts identified in the EA
1	Construction	Surface and groundwater contamination, soil erosion and safety, archaeological, health and safety, dust, noise, waste, and social impacts.
2	Operation	Traffic, noise, dust, and social impacts.

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

Management actions recommended to manage the potential impacts rated in the EA carried out for the proposed development are presented in the following tables. The management actions were compiled based on the three project phases:

- Construction (**Table 3-2**);
- Operation and maintenance phase management actions (**Table 3-3**).

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

3.2 Phase 1: Construction Phase Management Actions

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

Table 3-2: Construction phase management actions

Environmental Feature	Impact	Management Actions
EMP Implementation	Lack of EMP awareness and the implications thereof	<ul style="list-style-type: none"> • The proponent should appoint a Proponent's Representative (PR) that will act as their on-site implementing agent. • This person should be responsible to ensure that the Proponent's responsibilities are executed in compliance with relevant legislation and this EMP.
EMP training	Lack of EMP awareness and the implications thereof	<ul style="list-style-type: none"> • Employees appointed for construction work must ensure that all personnel are aware of necessary health, safety, and environmental considerations applicable to their respective work.
Monitoring	EMP non-compliance	<ul style="list-style-type: none"> • The ECO or the Proponent/PR should monitor the implementation of this EMP. <ul style="list-style-type: none"> ○ The PR should inspect the site throughout the construction phase at least on a monthly basis. ○ Bi-annual audits should be conducted of site activities by an external ECO. ○ Bi-annual audit reports are to be submitted to MEFT: DEA for auditing.
Waste Management	Visual impact and soil contamination	<ul style="list-style-type: none"> • The construction site should always be kept tidy. • All domestic and general waste produced daily should be cleaned and contained daily. • No waste may be buried or burned. • Waste containers (bins) should be emptied regularly and removed from site to the nearest municipal waste disposal site. • All recyclable waste needs to be taken to the nearest recycling depot. • A sufficient number of separate waste containers (bins) for hazardous and domestic / general waste must be provided on site.

Environmental Feature	Impact	Management Actions
		<ul style="list-style-type: none"> • Construction workers should be sensitised to dispose of waste in a responsible manner and not to litter. • No waste may remain on site after the completion of the project.
Hazardous Waste	Soil and groundwater contamination	<ul style="list-style-type: none"> • All heavy construction vehicles and equipment on site should be provided with a drip tray. • All heavy construction vehicles should be maintained regularly to prevent oil leakages. • Maintenance and washing of construction vehicles should take place only at a designated workshop area which surface is impermeable. • Spill kits should be available at the workshop areas in case of spills.
Wastewater	Groundwater contamination	<ul style="list-style-type: none"> • Use of the toilets instead of the veld must be strictly adhered to. • If grey water can be collected from ablution facilities at the contractors' camp it should be recycled and: <ul style="list-style-type: none"> ○ Used for dust suppression; ○ Used to water vegetable gardens or to support a small nursery in local communities (as and when agreed upon by such communities); and/or ○ Used to clean equipment. • All run off materials such as wastewater and other potential contaminants should be contained on site and disposed of in accordance with municipal wastewater discharge standards, so that they do not reach to ground or surface water systems. ○ Wastewater (excluding sewage) should be drained into lined / impermeable catch pits, big enough for daily / weekly usage without overflowing. Water from these catch pits should be removed from site to the nearest wastewater treatment facility by an approved wastewater removal company.
Shallow groundwater occurrences	Groundwater quality	<ul style="list-style-type: none"> • Ensure all dewatered groundwater is discharged to the closest drainage line; or back to the downstream environment via artificial discharge points (i.e. swales or attenuation ponds).

Environmental Feature	Impact	Management Actions
Soil	Soil contamination	<ul style="list-style-type: none"> • Spill control preventative measures should be put in place to manage soil contamination. • An impermeable liner should be laid down (particularly beneath cement mixers) on the site area in order to prevent contaminants from reaching to surrounding soils and eventually groundwater systems. • Potential contaminants such as wastewater should be contained on site and disposed of in accordance with municipal wastewater discharge standards so that they do not contaminate surrounding soils. • Contaminants such as hydrocarbons should be stored, handled, and managed appropriately. These must be collected on site and disposed at an appropriate facility that is licenced to receive such waste. • Soil contamination should be monitored on site daily by PR and monthly by ECO. • ECO(s) should ensure that a sufficient number of drip trays are available on-site and that these are utilised in the event of leakage from construction trucks or vehicles. • Contaminated soils onsite that may have resulted from leakage/spillage construction vehicles or equipment should be removed to a depth dependent on the size of the spill and replaced with clean soil. The contaminated soil should be removed and disposed at a designated landfill site suitable to receive contaminated soil. • Visual soil assessment for signs of contamination at vehicle holding, parking and activity areas. • Place oil drip trays under parked construction vehicles and hydraulic equipment at the site.
Soil	Soil interflow processes Soil structure and land capability Soil quality	<ul style="list-style-type: none"> • Only excavate areas applicable to the project area. • Backfill the material in the same order it was excavated to reduce contamination of deeper soils with shallow oxidised soils. • Cover excavated soils with a temporary liner to prevent contamination.

Environmental Feature	Impact	Management Actions
		<ul style="list-style-type: none"> • Keep the site clean of all general and domestic wastes. • All development footprint areas to remain as small as possible and vegetation clearing to be limited to what is essential. • Exposed soils to be protected using a suitable covering or revegetating. • Existing roads should be used as far as practical to gain access to the site. • Have emergency fuel & oil spill kits on site.
Dust and noise	Nuisance impacts	<ul style="list-style-type: none"> • The contractor(s) should suppress dust associated with construction activities by using a reasonable amount of water. • If feasible, wastewater should be treated to an acceptable water quality level, so that it can be used for dust suppression, if needed. <ul style="list-style-type: none"> ○ Noise levels during construction activities should be kept within the allowable standards for urban areas. ○ Noise levels should adhere to the SANS restrictions on noise. ○ Work hours should be restricted to between 08h00 and 17h00 due to the use of heavy equipment, power tools and the movement of heavy vehicles. • Noisy equipment should be shut down when not in use (when not needed) to avoid unnecessary noise on site. • Workers performing noisy tasks should be rotated regularly (work on shifts) to avoid exposing them to excessive noise for a long period of time in a day. • Workers should be equipped with personal protective equipment (PPE) such as earplugs to reduce noise exposure. • Workers should ensure that they wear the necessary PPE at all times on work sites.
Health and Safety	Health and safety impacts	<ul style="list-style-type: none"> ○ The contractor(s) should ensure that all personnel are provided with personal protective equipment (PPE), such as coveralls, gloves, safety boots, safety glasses and hard hats at all times.

Environmental Feature	Impact	Management Actions
		<ul style="list-style-type: none"> ○ Workers should ensure that they wear the PPE at all times on work sites. ○ No workers should be allowed to drink alcohol during working hours. ○ No workers should be allowed on site if under the influence of alcohol. ○ An appropriate location should be indicated on the site for the parking of construction and operation vehicles. ○ No unauthorised access should be allowed to the construction sites.
Construction labourers	Recruitment	<ul style="list-style-type: none"> ○ The Proponent should ensure that locals from the surrounding areas are employed for any unskilled labour. ○ Construction labourers should not be recruited on-site.
Construction labourers	General health and safety	<ul style="list-style-type: none"> ○ A suitable number of portable toilets (i.e., easily transportable) should be available on site. ○ Separate ablutions should be available for men and women and should clearly be indicated as such. ○ Sewage waste needs to be removed on a regular basis to the nearest approved sewage disposal site. ○ Workers responsible for cleaning the toilets should be provided with latex gloves and masks. ○ No workers may reside on-site for the entire duration of the construction period. Only a security guard will be allowed to sleep on-site (if there will be any). •
Communication	Communication with I&APs	<ul style="list-style-type: none"> ○ The Proponent or contractor should draft a Communication Plan, which should outline as a minimum the following: ○ How stakeholders, who require ongoing communication for the duration of the construction period, will be identified and recorded and who will manage and update these records. ○ How these stakeholders will be consulted on an ongoing basis.

Environmental Feature	Impact	Management Actions
		<ul style="list-style-type: none"> ○ Provision should be made for a grievance mechanism - outlining how concerns will be lodged/recorded and how feedback will be delivered, inclusive of further steps of arbitration in the event that feedback is deemed unsatisfactory. ○ Stakeholders need to be informed of the communication plan once drafted to ensure they are aware of the relevant communication channels.
Water	Groundwater contamination	<ul style="list-style-type: none"> ○ No wastewater / effluent should be allowed to leave the site premises without proper control. ○ These should be disposed of in accordance with municipal wastewater discharge standards. ● Regular maintenance and monitoring of construction equipment and vehicles should be done to detect early spills or leakages. ● An emergency plan should be available for major / minor spills at the construction site during operation activities (with consideration of air, groundwater, soil, and surface water). ○ Groundwater impact awareness training should be provided to the employees involved in this phase.
Archaeology	Loss of heritage resources	<ul style="list-style-type: none"> ● Should a heritage site or archaeological site be uncovered or discovered during the construction phase of the project, a “chance find” procedure should be applied in the order they appear below: <ul style="list-style-type: none"> ○ If operating machinery or equipment, stop work; ○ Demarcate the site with danger tape; ○ Determine GPS position if possible; ○ Report findings to the construction foreman; ○ Report findings, site location and actions taken to superintendent; ○ Cease any works in immediate vicinity; ○ Visit site and determine whether work can proceed without damage to findings; ○ Determine and demarcate exclusion boundary;

Environmental Feature	Impact	Management Actions
		<ul style="list-style-type: none"> ○ Site location and details to be added to the project's Geographic Information System (GIS) for field confirmation by archaeologist; ○ Inspect site and confirm addition to project GIS; ○ Advise the National Heritage Council of Namibia (NHCN) and request written permission to remove findings from work area; and ○ Recovery, packaging and labelling of findings for transfer to National Museum. <ul style="list-style-type: none"> • Should human remains be found, the following actions will be required: <ul style="list-style-type: none"> ○ Apply the chance find procedure as described above; ○ Schedule a field inspection with an archaeologist to confirm that remains are human; ○ Advise and liaise with the NHCN and Police; and ○ Remains will be recovered and removed either to the National Museum or the National Forensic Laboratory.
Noise	Nuisance impacts	<ul style="list-style-type: none"> • Work hours should be restricted to between 08h00 and 17h00 where construction involving the use of heavy equipment, power tools and the movement of heavy vehicles is less than 500 m from residential areas. If an exception to this provision is required, all residents within the 500 m radius should be given 1 week's written notice.
Rehabilitation	Visual impact	<ul style="list-style-type: none"> • Upon completion of the construction phase consultations should be held with the local community/property owner(s) regarding the post-construction use of remaining excavated areas (if applicable). • In the event that no post-construction uses are requested, all excavated/degraded areas need to be rehabilitated as follows:

Environmental Feature	Impact	Management Actions
		<ul style="list-style-type: none"> ○ Excavated areas may only be backfilled with clean or inert fill. No material of hazardous nature (e.g. sand removed with an oil spill) may be dumped as backfill. ○ Rehabilitated excavated areas need to match the contours of the existing landscape. ○ The rehabilitated area should not be higher (or lower) than nearby drainage channels. This ensures the efficiency of revegetation and reduces the chances of potential erosion. ○ Topsoil is to be spread across excavated areas evenly. ○ Deep ripping of areas to be rehabilitated is required, not just simple scarification, so as to enable rip lines to hold water after heavy rainfall. ● Ripping should be done along slopes, not up and down a slope, which could lead to enhanced erosion.
Topsoil	Loss of topsoil and associated opportunity costs	<ul style="list-style-type: none"> ● When excavations are carried out, topsoil¹ should be stockpiled in a demarcated area. ● Stockpiled topsoil should be used to rehabilitate post-construction degraded areas and/or other nearby degraded areas if such an area is located a reasonable distance from the stockpile.

¹ Topsoil is defined here as the top 150mm of surface material, which accounts for the seedbank.

3.3 Phase 2: Operational Phase Management Actions

The table below (Table 3-3) presents the management action for operational phase.

Table 3-3: Operational phase management actions

Environmental Feature	Impact	Management Actions
EMP Training	Lack of EMP awareness and the implications thereof	<ul style="list-style-type: none"> All contractors appointed for maintenance work on the respective streets and services infrastructure must ensure that all personnel are aware of necessary health, safety, and environmental considerations applicable to their respective work.
Water	Surface and groundwater contamination	<ul style="list-style-type: none"> Ensure that surface run-off water accumulating on-site are channelled and captured through a proper storm water management system to be treated in an appropriate manner before disposal into the environment.
Aesthetics	Visual impacts	<p>The proponent should consult with a view to incorporate the relevant local/national/international development guidelines which addresses the following:</p> <ul style="list-style-type: none"> The incorporation of indigenous vegetation into the development. To mark the area with appropriate road warning signs (e.g., the road curves to the left/right)
Noise	Noise impact	<ul style="list-style-type: none"> The proponent should consult with the view to incorporate the relevant local /national/ international guidelines to manage the generation of traffic noise in the development area.

3.4 Recommendations for Monitoring

3.4.1 EMP Compliance Monitoring

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

- Monitor whether provisions as set out in the EMP has been complied with.
- Non-compliance is to be recorded and discussed at weekly site meetings and timeous remedial actions taken.
- Should complaints be received regarding specific non-compliance matters continued communication should be held with the aggrieved parties until the matters are clarified.

4 CONCLUSION

Based on the recommendation given in this EMP, GCS is confident that the proposed activities, as described in **Chapter 2** of the scoping report may be granted an Environmental Clearance Certificate, provided that the EMP is implemented and that all the legal requirements pertaining to this development are complied with.