

DRAFT ENVIRONMENTAL MANAGEMENT PLAN:

FOR THE ESTABLISHMENT OF ONAWA PROPER

PROPONENT:	CONSULTANT:
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DEVELOPMENT ROLE PLAYERS:	
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SCOPING REPORT FOR THE ESTABLISHMENTS OF TOWNSHIPS AT ONAWA, PREPARED BY	
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GENERAL LOCATION DESCRIPTION OF THE DEVELOPMENT AREA:

DESCRIPTOR:	LOCATION SPECIFICS:
NATURE OF ACTIVITIES:	For the construction of public roads, infrastructure and activities in water within flood lines through township establishments.
REGION:	Oshana Region
LOCAL AUTHORITY:	Oshakati Town Council
FALL WITHIN:	Within the Remainder of Farm Oshakati Town and Townlands No. 880
NEAREST TOWNS / CITY:	Oshakati
SIZE OF PTN	337,368 Sqm
LAND USE:	Undetermined
STRUCTURES:	Yes
HISTORICAL RESOURCES:	No
CEMETERY:	Yes
FLOODLINES:	Yes
ENVIRONMENTAL SIGNIFICANT AREA:	<ul style="list-style-type: none"> ➤ Water areas ➤ Large Trees
LATITUDE:	-17.750149 S,
LONGITUDE:	15.729584 E
RELEVANT LISTED ACTIVITIES:	<p>The Environmental Management Act (Act 7 of 2007),</p> <p>Section 8: Water Resource Developments;</p> <p style="padding-left: 40px;">8.8. Construction and other activities in watercourse flood lines;</p> <p style="padding-left: 40px;">8.9. Construction and other activities within a ca area;</p> <p>Section 10: Infrastructure:</p> <p style="padding-left: 40px;">10.1. The construction of-</p> <p style="padding-left: 80px;">(b) public roads;</p> <p style="padding-left: 40px;">10.2. Route determination of roads and design of a physical infrastructure where-</p> <p style="padding-left: 80px;">(a) public roads.</p> <p>Section 11: Other activities</p> <p style="padding-left: 40px;">11.2. Construction of cemeteries, camping, leisure and recreation sites.</p>

ABBREVIATION:	DESCRIPTION:
am	ANTE MERIDIEM / BEFORE MIDDAY
Av	AVENUE
BID	BACKGROUND INFORMATION DOCUMENT
DEM	DIGITAL ELAVATION MODEL
ER	EMPLOYERS REPRESENTATIVE
EA	ENVIRONMENTAL ASSESSMENT
EC	ENVIRONMENTAL COMMISSIONER
ECO	ENVIRONMENTAL CONTROL OFFICER
EMP	ENVIRONMENTAL MANAGEMENT PLAN
Etc.	ET CETERA / OTHER SIMILAR THINGS
e.g.	EXEMPLI GRATIA
FRMP	FLOOD RISK MANAGEMENT PLAN
HIV	HUMAN IMMUNODEFICIENCY VIRUS
i.e.	ID EST. / IN OTHER WORDS
I&APs	INTERESTED AND AFFECTED PARTIES
NBD	THE NAMIBIA BIODIVERSITY DATABASE
NHC	NAMIBIAN HEALTH CARE
NORED	NORTHERN REGIONAL ELECTRICITY DISTRIBUTOR
pm	POST MERIDIEM / AFTER MIDDAY
SME	SMALL-AND-MEDIUM-SIZED ENTERPRISE
TRRP	TREE REMOVAL AND REPLACEMENT PLAN
TB	TUBERCULOSIS
URPB	URBAN AND REGIONAL PLANNING BOARD
WMP	WASTE MANAGEMENT PLAN
UNIT SYMBOL:	UNIT DESCRIPTION:
0°	DEGREES CELSIUS
E	EAST
ha	HECTARES
Km	KILOMETRE
m	METER
mm	MILLIMETRE
S	SOUTH
m ²	SQUARE METERS
%	PERCENTAGE

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1 INTRODUCTION

Onawa Proper consist of a mixed-use neighbourhood, therefore, meeting the rising business demand, institutional plots and housing within Onawa. The development includes the alignment, construction of public roads and the construction of infrastructure in watercourses within floodlines.

2 THE PROJECT TOWNSHIP

2.1 LOCATION OF THE SITES

The project is located on Portion A of the Remainder of Oshakati Town and Townlands No. 880. The project falls within the Oshana Region under Registration Division A.

The portion is south of the D 3671 Okatana to Ongwediva Road, at -17.750149 S, 15.729584 E. The Oshakati Town Council is the registered owner of the site.

2.2 THE LAYOUT DETAIL

The layout alters the portion's zoning from Undetermined to include Residential-, General Residential-, Institutional-, (which includes a formal cemetery), Business, land use, and Public Open Space. The erven shapes and sizes are illustrated in **Figure 1**.

Figure 1: The Proposed Layout

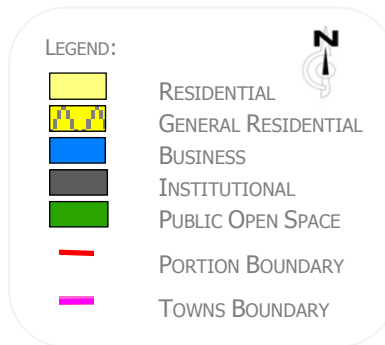


Table 1: Erf Sizes and Zonings

ZONING	Erf #	Total Size m ²	Ave Size m ²	%
Residential	293	107 328.2	366	32%
General Residential	14	30 246	2 160	9%
Business	7	6 049	864	2%
Institutional	2	7 585	3 793	2%
Public Open Space	14	98 842	7 060	29%
Re/Str		87 217		26%
TOTAL	330	337 268		100%

2.3 THE STREET LAYOUT

The layout has 15 (fifteen) entry points, of which one (1) access point links to an already existing 20 m Distributor Road (D3671).

The layout has various types of roads: 10 m collector road (yellow). 13 m distributor roads (light blue) connect with 15 m distributor roads (purple) which leads into the 20 m distributor roads (pink) to assure adequate flow in the area.

Figure 2: Street Layout

To Okatana (Oshakati)



2.3.1 PROVISION FOR DRAINAGE:

Stormwater drainage should be designed, and culverts need to be used to accommodate the water flow.

3 SUMMARY OF POTENTIAL IMPACTS

The planning of the layout, together with the upgrading of bulk infrastructure and alignment of roads, has the potential to cause environmental and social impacts. The following is a list of potential impacts identified through the scoping process:

3.1.1 BENEFITS OF THE PROJECT:

- Provision for serviced erven;
- Formalisation of the existing cemetery;
- Stimulation of economic development and providing new employment opportunities during construction; and
- Stimulation of the health and wellness of the Oshakati, Onawa, Okatana and the Oshana Region.

3.1.2 POTENTIAL NEGATIVE IMPACTS DURING CONSTRUCTION:

- Impact of removal of vegetation from the site;
- Impact of dust;
- Impact of noise;
- Impact on traffic flow;
- Impact on the health and safety of workers; and
- Impact of waste.

3.1.3 POTENTIAL NEGATIVE IMPACTS DURING OPERATIONS:

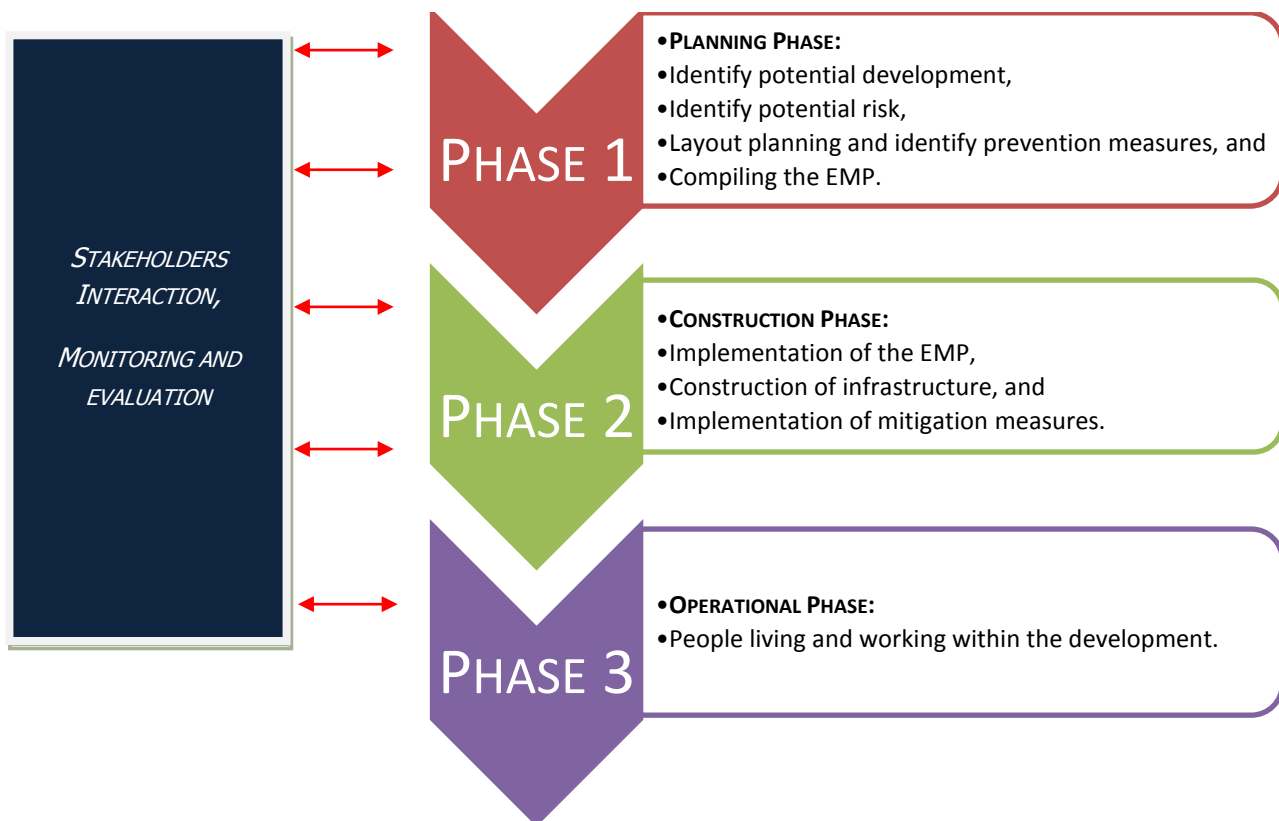
- Potential flooding; and
- Impact of waste during operation.

4 THE ENVIRONMENTAL MANAGEMENT PLAN (EMP)

An EMP is an essential product of an Environmental Assessment (EA) process. An EMP synthesises all recommended mitigation and monitoring measures laid out according to the various stages of a project life cycle, with clearly defined follow-up actions and responsibilities assigned to specific actors. This EMP has been drafted in accordance with the Namibian Environmental Management Act (No. 7 of 2007) and its Environmental Impact Assessment Regulations (2012). This plan describes the mitigation and monitoring measures to be implemented during the following phases of the development:

- ❖ Construction and
- ❖ Operation

Table 2: Project Phases



4.1 RESPONSIBILITIES

Implementation of the EMP is ultimately the Developer's responsibility (Oshakati Town Council and Development Workshop Namibia), the development administrator after construction and the Oshakati Town Council. Due to the project's magnitude, it may be necessary to outsource certain functions pertaining to managing all aspects of the actual development process. When implementing the EMP, the following roles and responsibilities apply.

Each role player's responsibilities are described below.

EMPLOYERS REPRESENTATIVE (ER)

The Developer appoints the ER to manage all contracts for work/services outsourced during the construction phase. Any competent employee or third-party organisation which possesses the appropriate experience may fill this position. Any official communication regarding work agreements is delivered through this person/organisation.

The ER shall assist the Environmental Control Officer (ECO) where necessary and will have the following responsibilities regarding the implementation of this Environmental Management Plan (EMP):

- ❖ Ensuring that the Contractor has obtained the necessary legal authorisations and permits,
- ❖ Assisting the Contractor in finding environmentally responsible solutions to problems with input from the ECO where appropriate,
- ❖ Warning and ordering the removal of individuals and/or equipment not complying with the EMP,
- ❖ Issuing fines for the transgression of site rules and penalties for contravention of the EMP, and
- ❖ Providing input into the ECO's ongoing internal review of the EMP. This review report should be submitted on a monthly basis to the Developer.

ENVIRONMENTAL CONTROL OFFICER (ECO)

The ECO should be a competent person appointed by the ER. If the ECO has no occupational safety and health training on a construction site, they should be sent for such training. The ECO is the ER's on-site representative primarily responsible for the monitoring and reviewing on-site environmental management and implementation of the EMP by the Contractor(s). If no ECO is appointed, the duties of the ECO fall upon the ER. The Oshakati Town Council should, with the commencement of the project, monitor the implementation of the EMP on-site on an ad hoc basis.

The ECO's duties include the following:

- ❖ Assisting the ER in ensuring that the necessary legal authorisations have been obtained;
- ❖ Maintaining open and direct lines of communication between the ER, Developer, Contractor, and Interested and Affected Parties (I&APs) concerning this EMP and matters incidental to that;

- ❖ Monthly site inspection of all construction areas with regard to compliance with this EMP;
- ❖ Monitor and verify adherence to the EMP (audit the implementation of the EMP) and verify that environmental impacts are kept to a minimum;
- ❖ Taking appropriate action if the specifications for the EMP are not adhered to;
- ❖ Assisting the Contractor in finding environmentally responsible solutions to problems;
- ❖ Training of all construction personnel with regard to the construction and operation mitigation measures of this EMP and continually promoting awareness of these;
- ❖ Ensure that all contractors shall provide adequate environmental awareness training (see Plan Component 5) of senior site personnel by the ECO and that all construction workers and newcomers receive an induction presentation on the importance and implications of this EMP. The presentation shall be conducted, as far as is possible, in the employees' language of choice;
- ❖ Monthly inspection to verify if new personnel have received appropriate environmental, health and safety training and training those who have not;
- ❖ Advising on the removal of person(s) and/or equipment not complying with the specifications of the EMP in consultation with the ER;
- ❖ Recommending the issuing of fines for transgressions of site rules and penalties for contraventions of the EMP; and
- ❖ Undertaking a monthly-month review of the EMP and recommending additions and/or changes to the document.

CONTRACTOR

The Contractor is responsible for implementing, on-site monitoring and evaluating the EMP. In order to ensure sound environmental management, the relevant sections of this EMP should be incorporated operation in all contracts of work outsourced, thus legally binding all appointed contractors.

The Contractor must keep records of all environmental training sessions, including names, dates and the information presented for inspection and reporting by the ER and ECO at all times.

5 RELEVANT LEGISLATION AND PERMIT REQUIREMENTS

The following table provides the legislative framework within which the EMP should be viewed:

STATUTE	PROVISIONS	PROJECT IMPLICATIONS
<p>THE CONSTITUTION OF THE REPUBLIC OF NAMIBIA, 1990:</p>	<p>The state shall actively promote and maintain the welfare of the people by adopting, inter-alia, policies aimed at the following:</p> <p>(i) <i>management of ecosystems, essential ecological processes and biological diversity of Namibia and utilisation of living natural resources on a sustainable basis for the benefit of all.</i></p>	<p>Ensure that the ecological integrity of the ecosystems of the area is protected.</p>
<p>ENVIRONMENTAL MANAGEMENT:</p>	<p>Environmental Management Act No.7 of 2007:</p> <p>EIA Regulation (EIAR) GN 57/2007 (GG 3212):</p> <p>In terms of Sections, 10.1(a), 10.1(b), 10.2(a), and 10.2(c) for environmental clearance for the construction of oil, water, gas and petrochemical and other bulk supply pipelines, the construction of public roads and the construction of a road with more than one lane of traffic in both directions.</p> <p>In terms of Sections 8.8, 8.10 and 8.11, for construction and other activities in watercourses within flood lines, the reclamation of land from below or above the high water and the alteration of natural wetlands are listed activities.</p> <p>Prescribes the procedures to be followed for authorisation of the project (i.e. Environmental clearance certificate).</p>	<p>Evaluate if the alignment of the street will impact the social and natural environment.</p> <p>Determine if the risk of flooding of the erven is at acceptable levels.</p> <p>Determine if the proposed limited infill would impact the function of the watercourse or cause flooding elsewhere.</p> <p>Determine how wastewater pipelines in the riverbed should be designed, constructed and maintained to prevent groundwater and other pollution.</p>

<p>WATER AND RESOURCES MANAGEMENT:</p>	<p>The Water Act No. 54 of 1956 and Water Resources and Management Act No.27 of 2007 Section 92:</p> <p>Section 92 (1), A person may not engage in any construction work or activity that causes or is likely to cause, the natural flow conditions of water in to or from a watercourse to be modified, unless the Minister has granted prior written approval for the work or activity to be carried out.</p> <p>Section 100 (e) consult with the regional Council or local authority in determining the geographic extent of flood plain areas in its region or local authority, as the case may be, and assist any such councils in regulating the development and use of land within floodplain areas</p> <p>Section 100 (f) prescribe measures for control and management of storm and flood risk within local authority areas.</p> <p>Section 101 (b) development on the banks of any wetland or dam; and</p> <p>Section 101 (c) the removal of rocks, sand or gravel or any other material from a watercourse.</p>	<p>Assess the potential risk that the planned activities may have on both the watercourse on the one hand and future occupants of the land on the other.</p>
<p>THE PUBLIC HEALTH AND HEALTH AND SAFETY REGULATIONS:</p>	<p>The Public Health Act 36 of 1919 as amended and the Health and Safety Regulations:</p> <p>These acts control the existence of nuisances such as litter that can cause a threat to the environment and public health.</p>	<p>Prevent activities that can have an impact on the health and safety of the public.</p>
<p>COMPENSATION OF STRUCTURES OR FIELDS</p>	<p>Cabinet Compensation Policy Guidelines for Communal land:</p> <p>Providing compensation to individuals regarding relocating people, removing fruit trees, or developing Mahango fields within communal land.</p>	<p>Assess to what extent the proposed policy complies with the plan's provision to ensure the rights of individuals within communal land.</p>

PLANNING AND DESIGN PHASE

Table 3: Management Requirements for the Planning and Design Phase

ASPECT	MANAGEMENT REQUIREMENTS
Natural Building Material	All building material (sand and gravel) should only be sourced from a local registered borrow pit. Road building material (G4, G5, etc. material) must be sourced in collaboration within Oshakati from approved borrow pits within the townlands. If suitable material can only be sourced from untouched land to create a new borrow pit, then that is legally subject to an EIA by the Oshakati Town Council .
EMP Implementation	Relevant sections of this EMP should be included in the tender documents for all construction so that tenderers can implement the EMP.
Financial Provisions	<ul style="list-style-type: none"> • Financial provision for the facilitation of an induction programme for senior, temporary construction personnel and subcontractors and associated personnel should be included as a cost item within tenders concerning the construction and/or operation and maintenance of the proposed development. • Financial provision for a Tree Management Plan compilation should be included as a cost item within construction tender documents.
Recruitment	<ul style="list-style-type: none"> • Provisions designed to maximise the use of local labour should be included within tenders concerning the construction of bulk and reticulation services. • A provision stating that all unskilled labour should be sourced locally should be included in tenders concerning the construction of all development services. • Specific recruitment procedures ensuring local firms enjoy preference during tender adjudication should be included in tenders concerning the construction of the development's bulk services. • Provisions promoting gender equality pertaining to recruitment should be included in tenders concerning the construction of the township services. • Women should be given preference for specific jobs (e.g. those jobs that require relatively less physical strength).

6 CONSTRUCTION MITIGATION DETAIL

Table 4 provides a scale overview of all the major environmental management themes pertaining to generic and site-specific construction mitigation details. This table serves as a quick reference for the subsequent mitigation detail for each theme. This is done to simplify the implementation of the construction component of this EMP.

Table 4: Generic and Site-Specific Environmental Management Actions:

THEME:	OBJECTIVE:	MITIGATION DETAIL:	
		GENERIC:	SITE-SPECIFIC:
WASTE MANAGEMENT:	Minimise and avoid all waste pollution associated with construction.	PLAN COMPONENT 1	YES
HEALTH AND SAFETY MANAGEMENT:	Focusing on the wellbeing of the labourers and the community near the construction.	PLAN COMPONENT 2	YES
NOISE AND DUST MANAGEMENT:	Minimise and avoid all noise and dust associated with construction.	PLAN COMPONENT 3	YES
TRAFFIC MANAGEMENT:	Minimise and avoid traffic impacts.	PLAN COMPONENT 4	YES
ENVIRONMENTAL TRAINING AND AWARENESS:	Awareness creation regarding the provisions of the EMP as well as the importance of safeguarding environmental resources.	PLAN COMPONENT 5	YES
ENVIRONMENTAL CONSERVATION:	Minimise the effect of the activity and protect the social environment in which it is happening.	PLAN COMPONENT 6	YES
EMPLOYMENT /RECRUITMENT	Ensure the protection of workers' rights and safety in Namibia.	PLAN COMPONENT 7	YES
STAKEHOLDER COMMUNICATION:	Provide a platform for stakeholders to raise grievances and receive feedback and hence, minimise negative conflict.	PLAN COMPONENT 8	YES
SOCIO-ECONOMIC AND MISCELLANEOUS:	Protecting cultural and general wellbeing of the affected.	PLAN COMPONENT 9	NA

6.1 PLAN COMPONENT 1: WASTE MANAGEMENT

At the Onawa construction site, high importance shall be placed on waste management, and it needs to be performed daily. Solid waste is the expected major source of waste at the construction site; therefore, a *Waste Management Plan (WMP)* should be compiled. The WMP should address measures for the use and disposal of general waste and hazardous waste at the site, as indicated below:

6.1.1 CONSTRUCTION WASTE MANAGEMENT:

GENERAL WASTE:

- The construction site should be kept tidy at all times. All general construction waste produced should be cleaned and contained daily,
- No waste may be buried or burned,
- No waste may be dumped in any watercourse in and around the project area,
- A sufficient number of separate waste containers (bins) for hazardous and domestic/general waste must be provided on-site. These should be marked as such, and
- Construction labourers should be sensitised to dispose of waste in a responsible manner and not to litter.

HAZARDOUS WASTE:

- All heavy construction vehicles and large fuel-powered equipment on the site should be provided with a drip tray,
 - If the vehicle used is suspected of having an oil leakage, drip trays are to be transported with vehicles wherever they go on site.
 - Drip trays should be cleaned daily, and spillage handled, stored, and disposed of as hazardous waste.
- Spilled concrete (wet) should be treated as waste and disposed of by the end of each day in the appropriate waste containers,
- Unbound cement (dry) in its raw state and cement-infused water from mixers are classified as hazardous waste due to its high alkalinity content. Treatment would be the same as for hazardous waste, and disposal of such should take place in the appropriate labelled hazardous waste containers,

- A hazardous waste spill clean-up kit should be kept on-site, and its stock replenished as needed. The kit should consist of the following items (with the numbers of each item is up to the discretion of the ER):
 - Medium-sized shovels, strong plastic bags, drip trays, dust masks, heavy-duty gloves, a biodegradable hand wash (degreasing) agent, and
- A storage location must be provided for the use of all hazardous substances (e.g. fuel etc.) or chemicals. The storage area must be of an impermeable surface; this is bonded, awaiting use and disposal afterwards.

The duration of the phase is short-term (0-5 years) and ends at the start of the operational phase. The responsibility to implement the EMP, on-site monitoring and evaluation of the EMP / WMP lies with the Contractor, ECO and the ER.

6.1.2 ONAWA OPERATIONAL WASTE MANAGEMENT:

GENERAL WASTE:

- The development needs to provide efficient waste management infrastructure for households and businesses, which should include recycling infrastructure,
- The household and business waste needs to be collected by the **Oshakati Town Council** or service provider, and
- Sewerage should be pumped to the Oshakati Town Council bulk sewerage lines through a closed system pipeline.

The timeframe of the actions mentioned above is long-term. The responsibility and monitoring lie with the **Oshakati Town Council**, which is responsible for maintaining the sewerage pipelines after construction and the solid waste removal within Oshakati Town.

6.2 PLAN COMPONENT 2: HEALTH AND SAFETY

The health and safety aspect of the workspace cannot be understated, considering that unexpected severe events can occur at any given moment.

6.2.1 HEALTH AND SAFETY MANAGEMENT:

The construction industry is fraught with hazards; therefore, careful planning and prevention measures are necessary to reduce the risk of serious injuries while on duty.

The Contractor must apply to the Labour Act. Nr. 11 of 2007 in conjunction with Regulation 156, 'Regulations which describe the health and safety of employees at work'. Measures to mitigate the health and safety of workers on the site and nearby residents should be included in the EMP.

HIV/AIDS AND TB TRAINING:

The Contractor should approach the Ministry of Health and Social Services to appoint a health officer to facilitate HIV/AIDS and TB education programmes periodically on-site during the construction phase.

ROAD SAFETY:

- Vehicles contents/consignments should be adequately secured to avoid items falling off the vehicle.
- All trucks carrying sand or fine material loads should be covered with a shade net cover to prevent these materials from being blown off onto approaching vehicles from both directions.
- No construction vehicle may be used to transport personnel to and from the construction site. This is an offence and punishable by law due to the extreme safety risk involved.

SAFETY AROUND EXCAVATED AND WORK AREAS:

- A meeting with the neighbouring community shall be held, and the safety precautions of the construction area explained,
- Excavations should be left open for an absolute minimum time only,
- Excavate short lengths of trenches and box areas for services or foundations in such a way that the trench will not be left unattended for more than 24 hours,

Demarcate the following areas with danger tape or orange demarcation netting:

- All excavation works;
 - Soil and other building material stockpiles; and
 - Temporary waste stockpiles.
- Provide additional warning signage in areas of movement and in "no person allowed" areas where workers are not active,
 - Work areas must be set out and isolated with danger tape on a daily basis,
 - All building materials and equipment are to be stored only within set out and demarcated work areas,
 - Only construction personnel will be allowed within these demarcated work areas, and
 - Two dry chemical powder fire extinguishers should be available at fuel storage areas and the workshop area, as well as the site office.

ABLUTIONS:

- Separate ablutions (toilet) should be available for men and women and should clearly be indicated as such,
- Portable toilets (i.e. easily transportable) should be available at every construction site:
 - 1 toilet for every 25 females.
 - 1 toilet for every 50 males.
- Sewage waste should be removed regularly to an approved (municipal) sewage disposal site. Alternatively, pump it into sealable containers and store it until it can be removed, and
- Workers responsible for cleaning the toilets should be provided with latex gloves and masks.

6.2.2 OPERATIONAL PHASE HEALTH AND SAFETY MANAGEMENT:

The development site has low-lying areas known for rainwater accumulation during the rainy season. Part of the low-lying water areas is planned in public open space. This is to ensure that limited development takes place within the flood areas. Mitigation measures should be put in place to prevent any flood risk within the layout.

Flood Risk Impact Preventions:

- All services (power and sewer lines) need to be placed in the evaluated road reserve to prevent it from being influenced during rainy seasons.
- The sewerage network needs to link up with the nearby sewer line which runs through the area. The system should be incorporated with the nearest extensions sewerage network, which flows to the oxidation ponds located north of the town.
- The residents or Contractors need to inform the Oshakati Council's sewer or electrical department if they have problems with the sewer or electrical network.
- The culverts need to be maintained.

The timeframe of the actions mentioned above is continuous, and the responsibility and monitoring lie with the **Oshakati Town Council**, the owners of the new erven.

6.3 PLAN COMPONENT 3: NOISE AND DUST

Noise and dust can cause stress and health impacts on nearby residents and construction workers. Therefore, high priority should be placed on mitigation measures to manage noise and dust pollution within the area.

6.3.1 NOISE PREVENTION:

Noise associated with construction and traffic activities will be heard from the site. The following measures are provided below to minimise noise:

- No noisy activities on-site between 17:00 and 07:00,
- Construction activities on Saturday shall be between 08:00 and 13:00,
- Sunday and public holidays - no noisy activities on-site, and
- In the event that work is necessary outside the designated working hours, all receptors (residents or businesses within 500 m from the work areas) need to be notified at least two days in advance.

The duration of the actions mentioned above is short-term, and the impact ceases after the operational phase starts. The responsibility for monitoring lies with the Contractor, ECO of the development, and the **Oshakati Town Council**.

6.3.2 DUST PREVENTION:

The movement of construction vehicles on bare soil will cause excessive dust, which will expose nearby residents and workers on the site to dust pollution. Fugitive dust from construction sites can spread crystalline silica, which can impact nearby residents' and site workers' health.

Fugitive dust from the construction site can also cause poor visibility for road users.

The following measures are provided below to minimise dust:

- Provide a suitable screen/panels surrounding the construction site to reduce the spread of dust from the site,
- Dust palliatives need to be applied to the road surfaces to prevent dust clouds,
- A watering truck with semi-purified water should be used on gravel roads with the most vehicle movement, especially during dry and windy conditions. However, due consideration should be given to water restrictions during times of drought and applicable seasons,
- Stockpiles of building material and earth material need to be kept moist, or the surfaces need to be kept stabilised. A nylon mesh cover that reduces dust lift with \pm 50% can be an alternative option,
- Limit the size of stockpiles of large quantities of soil, topsoil and other fine material,
- Dust protection masks should be issued to all workers exposed to dust on the site, and
- Improve awareness of ambient air quality and consideration regarding wind speed and direction when undertaking dust-generating activities.

The duration of the actions mentioned above is short-term, and the impact ceases after the operational phase starts. The responsibility for implementation and monitoring lies with the Contractor, ECO of the development, and the **Oshakati Town Council**.

6.4 PLAN COMPONENT 4: TRAFFIC MANAGEMENT

The construction of the infrastructure will have a disruptive impact on the surrounding traffic. Mitigation measures should be in place to minimise the anticipated disruption of the surrounding traffic during the construction of the infrastructure upgrade.

6.4.1 TRAFFIC DURING THE CONSTRUCTION PHASE:

The following measures are provided to minimise traffic:

TRAFFIC MITIGATION:

- Develop a **Traffic Plan** to reduce traffic flow interference from construction activities. The plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service.
- Schedule operations, affecting traffic for off-peak hours. Minimise obstruction of through-traffic lanes. Provide a flag person to guide traffic and ensure construction site safety properly.
- Construction vehicles should be restricted during peak hours, between 07:00-08:00 and 17:00-18:30.
- Appropriate advance road warning signage needs to be used.

The duration of the actions mentioned above is short-term and ends when the operation phase commences. The responsibility for implementation and monitoring lies with the Contractor. However, the road infrastructure will become permanent, and the responsibility for maintaining the streets lies with the **Oshakati Town Council** after construction.

6.5 PLAN COMPONENT 5: ENVIRONMENTAL TRAINING AND AWARENESS

All construction workers at the development site are to undergo environmental training and awareness programs. The following aspects should be included:

- Explanation of the importance of complying with the EMP.
- Discussion of the potential environmental impacts of construction activities.
- Employees' roles and responsibilities, including emergency preparedness.
- Explanation of the mitigation measures that must be implemented when particular workgroups carry out their respective activities.
- Explanation of the specific mitigation measures within this EMP, especially unfamiliar provisions.

An attendance register should be completed during the training sessions, including the names, position designations, and signatures of everyone who attended the training and kept on file for auditing purposes. Thereby, all the training sessions prior to it being conducted must be approved by the ECO.

6.6 PLAN COMPONENT 6: ENVIRONMENTAL CONSERVATION

6.6.1 TREE MANAGEMENT PLAN:

The layout was prepared in such a way as to avoid the removal of trees. The trees in the project site will remain intact as far as possible during development. Trees need to be accommodated on individual erven and along the road in such a manner as to allow the positioning and construction of residential buildings and construction of the road without necessitating removal.

A **Tree Management Plan** shall be implemented, which should include the following content at the minimum level:

- All protected trees should be surveyed,
- Permits shall be obtained before the removal of protected trees by the ECO.
- Protected trees that are removed shall be replaced and used within the landscaping of the development, and
- Indigenous plants and trees can be obtained at a commercial nursery. The forestry officers can also direct to nearby nurseries where additional trees may be bought.

The duration of the actions mentioned above is short-term. The responsibility for the implementation of the **Tree Management Plan** lies with the Developer and Contractor.

6.6.2 MATERIALS CAMP AND LAY-DOWN AREAS:

A suitable location for the **materials camp and lay-down** areas should be identified with the assistance of the ER, and the following should be considered in selecting these sites:

- The areas designated for the proposed services infrastructure should be used as far as possible, and
- Sensitive areas should be avoided (e.g. watercourses).

The duration of the actions mentioned above is short-term. The responsibility for the implementation of the EMP lies with the Contractor, ER and ECO.

6.7 PLAN COMPONENT 7: EMPLOYMENT/RECRUITMENT

The construction of the development will take place over several years and will employ up to a thousand (1000) workers. At this stage, it is unclear which skill sets would be required, nor the extent to which employment opportunities could be created in the project area.

The benefits to the local community from jobs could depend on the extent of local recruitment and the measures put in place to ensure preferential local gender-based recruitment where possible.

6.7.1 RECRUITMENT:

The formal recruitment process should be compiled and shall include the following minimum provisions:

- The ER and the Contractor shall design a recruitment process whereby local residents shall be given preference,
- Ensure that all sub-contractors are aware of recommended recruitment procedures and discourage any recruitment of labour outside the agreed-upon process,
- Contractors should give preference in terms of recruitment of sub-contractors and individual labourers to those from the project area and only then look to surrounding towns, and
- Clearly explain to all job-seekers the terms and conditions of their respective employment contract (e.g. period of employment, etc.) – make use of interpreters when required.

6.7.2 LEGISLATION:

The Contractor needs to adhere to the legal provisions in the Labour Act (Labour Act. 11 of 2007) for the recruitment of labour (target percentages for gender balance, optimal use of local labour and SME's, etc.) in the contract.

6.8 PLAN COMPONENT 8: STAKEHOLDER COMMUNICATION

Within the construction phase, the Developer should draft a *Communication Plan*. In collaboration with the Developer, the ER must appoint an ECO to liaise between the Contractor, stakeholders, Developer, and consultants. The Contractor shall appoint a person from the construction team to take responsibility for implementing all provisions of this EMP.

6.8.1 COMMUNICATION PLAN:

In addition, the plan shall specify:

- 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, and
- How grievances shall be handled – i.e. how concerns can/ will be lodged/ recorded and how feedback will be delivered as well as further steps of arbitration in the event that feedback is deemed unsatisfactory.

6.8.2 GENERAL COMMUNICATION:

- The Contractor shall, at every site meeting, report on the status of the implementation of all provisions of the EMP,
- The ECO must list the stakeholders of the project and their contact details with whom ongoing communication would be required for the duration of the contract. This list, together with the **Communication Plan**, must be agreed upon and given to the ER before construction commences,
- The Communication Plan, once agreed upon by the Developer, shall be binding,
- All communication with the stakeholders must take place through the ECO,
- A copy of the EMP must be available at the site office and should be accessible to all stakeholders,
- The Contractor should liaise with the Developer regarding all issues related to community consultation and negotiation before construction commences,
- A procedure should be put in place to ensure that concerns raised have been followed-up and addressed, and
- All people on the stakeholder's list should be informed about the availability of the complaints register in writing by the ER before the commencement of construction activities.

Table 5: Public Consultation Process

THE PROCESS:	DESCRIPTION OF THE PROCESS:
DURING THE PLANNING PHASE:	
I&APs Identification:	Key Interested and Affected Parties (I&APs) were identified and included in a list of I&APs. The list included the Oshakati Town Council.
Newspaper Notices:	For two consecutive weeks, notices were placed in two widely circulated newspapers, briefly describing the developments and their locality, inviting the public to register as I&APs (Appendix C.1).
Information Provision:	A Background Information Document (BID) was compiled that contained essential information about the project (Appendix C.3).
Meetings:	<ul style="list-style-type: none"> – The meeting date was 28 February 2022. – Information was provided to stakeholders.
Public Comments Period:	Between 8 February to 9 March 2022.
DURING THE CONSTRUCTION PHASE:	
Communication Plan:	<ul style="list-style-type: none"> – At every site meeting, the Contractor shall report on the status of the implementation of all provisions of the EMP. – The ECO must list the stakeholders of the project and their contact details with whom ongoing communication would be required for the duration of the contract. Together with the Communication Plan, this list must be agreed upon and given to the ER before construction commences. – The Communication Plan, once agreed upon by the Developer, shall be binding. – All communication with the stakeholders must take place through the ECO. – A copy of the EMP must be available at the site office and accessible to all stakeholders. – The Contractor should liaise with the Developer regarding all community consultation and negotiation issues before construction commences. – A procedure should be put in place to ensure that concerns raised have been followed up and addressed. – All people on the stakeholder's list should be informed about the availability of the complaints register in writing by the ER before the commencement of construction activities.

6.9 PLAN COMPONENT 9: SOCIO-ECONOMIC AND MISCELLANEOUS

No heritage or archaeological sites were found in the area. However, the EMP's standard procedures for heritage or archaeological sites are still included in this plan. No formal survey for archaeological remains was conducted during the field studies of the site, therefore, the possibility of it containing some or the other form of remnants cannot be ruled out, especially when excavations are done.

Heritage or Archaeological Sites

In the case where a heritage or archaeological site is uncovered or discovered during the construction phase of the development, a 'chance find' procedure should be applied as follows:

- If operating machinery or equipment to stop work immediately;
- Demarcate the site with danger tape;
- Determine GPS position if possible;
- Report findings to foreman;
- Cease any works in the immediate vicinity;
- Visit the site and determine whether the work can proceed without damage to the findings;
- Determine and demarcate exclusion boundary;
- Inspect the site and confirm the exact location.
- Advise the National Heritage Council (NHC) and request written permission to remove findings from the work area; and
- Recovery, packaging and labelling of findings for transfer to National Museum.

Should human remains be found, the following actions will be required:

- Apply the 'chance find' procedure as formerly described;
- Schedule a field inspection with an archaeologist to confirm that the remains are human;
- Advise and liaise with the NHC and Police; and
- Remains will be recovered and removed either to the National Museum or the National Forensic Laboratory.

Suppose it is found that the construction site is on a heritage site or an archaeological site. In that case, the Developer will need to apply for a permit from the National Heritage Council to carry out works in a protected place as indicated in the National Heritage Act 27 of 2004.