

# ENVIRONMENTAL IMPACT ASSESSMENT (EIA) FOR THE PROPOSED CEMETERY ESTABLISHMENT IN LÜDERITZ, //KARAS REGION

## ENVIRONMENTAL MANAGEMENT PLAN



**Prepared For:**

Lüderitz Town Council  
P. O Box 19  
Lüderitz



**Prepared by:**

**Green Gain**  
Consultants

+264 81142 2927  
info@greegain.com.na  
<https://www.greengain.com.na>

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## DOCUMENT DESCRIPTION

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**Client:** Lüderitz Town Council  
P.O. Box 19  
Lüderitz  
Namibia

**EAP:** Green Gain Consultant cc  
Mr. J. K. Amushila  
Ms. L. Hailaula

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## LIST OF ACRONYMS

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DEAF	Department of Environmental Affairs and Forestry
EAP	Environmental Assessment Practitioner
ECC	Environmental Clearance Certificate
ECO	Environment Compliance Officer
EIA	Environmental Impact Assessment
EMA	Environmental Management Act
EMP	Environmental Management Plan
GIS	Geographic Information Systems
GN	Government Notice
GRN	Government Republic of Namibia
I&AP	Interested and Affected Parties
MAW&LR	Ministry of Agriculture, Water and Land Reform
MEFT	Ministry of Environment, Forestry and Tourism
MURD	Ministry of Urban and Rural Development
NDP	National Development Plan
PPE	Personal Protective Equipment
NHE:	National Housing Enterprises

# 1. INTRODUCTION

The Lüderitz Town Council is presently running out of burial spaces at the existing cemeteries; thus, it has proposed to establish a new cemetery within its municipal townlands. The proposed cemetery will be up to 2ha in size and is planned for the next fifty (50) years. According to the Environmental Management Act No. 07 of 2007 and the Environmental Impact Assessment Regulations (GN No 30 of 2012), cemetery establishment is a listed activities that may not be undertaken without an Environmental Clearance Certificate being obtained, hence an Environmental Impact Assessment is required.

Green Gain Environmental Consultants cc has been appointed as an independent Environmental Assessment Practitioner (EAP) to undertake the EIA study and apply for the Environmental Clearance Certificate with the Ministry of Environment, Forestry and Tourism. The study was carried out in a systematic process outlined in the Environmental Assessment Policy. A multidisciplinary approach was used to achieve a development which has minimal environmental impacts. This approach includes a baseline study, review of legal framework, consultation of stakeholders and Interested and Affected Parties. This document details the Environmental Management Plan (EMP) as informed by the Environmental Impact Assessment (EIA) conducted for the cemetery to be established as outlined in the Scoping Report.

This EMP synthesizes the proposed mitigation and monitoring measures, laid out according to the various stages of the project life cycle, with defined follow-up actions and responsibilities. It provides a link between the impacts identified in the EIA process and the required environmental management aspects on the ground during the project implementation and operation. It is important to note that an EMP is a legal binding document, and it is guided by the 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 these developments:

- **Planning and design** - the period, prior to construction, operation and maintenance, during which preliminary legislative and administrative arrangements (such as construction tendering and recruitment processes) are carried out in preparation for the construction of the cemetery.

- **Construction** - During this phase, there will be some earthworks to prepare the site for construction and installation necessary services infrastructure and structures required for the operation of the cemetery.
- **Operation and maintenance** - This is the phase during which the cemetery will be operational and maintenance done by the Municipality of Walvis Bay. It is during this phase that the Council, as and when required by its residents provides the needed burial arrangements in the cemetery.
- **Decommissioning** – Cemeteries do not necessarily require decommissioning, but rather closure when they reach full capacity. Therefore, when the new cemetery reaches its capacity in future, Council will have to close it and look for a new site.

This draft EMP will be used by the Proponent and its employees and/or contractors in guiding them during the cemetery operations to ensure that impacts on the environment are avoided or limited if cannot be avoided completely.

## 2. PURPOSE OF THE EMP

The purpose of this document is to guide the environmental management throughout the phases of the proposed development, namely: planning and design, construction, and operation & maintenance. Furthermore, it is to ensure that impacts on the environment due to the proposed development are limited. The EMP has the following objectives:

- Assess the suitability of the proposed developments on the proposed development site
- To identify possible impacts of the proposed activity on the environment and mitigation thereof.
- To provide information on construction activities associated with the identified environmental issues.
- To provide guidelines for the management of the identified environmental issues; and
- To provide guidelines to the responsible person to follow appropriate contingency plans in the case of possible impacts.

### 3. LEGAL REQUIREMENTS

To protect the environment and ensure that the proposed cemetery development operates in an environmentally responsible manner. There are several significant pieces of environmental legislation that need to be considered during this study.

**Table 1: Applicable and relevant legislation at various phases throughout the project lifecycle**

LEGISLATION	PROVISION	PROJECT IMPLICATION
<b>Environmental Management Act No. 7 of 2007</b>	The purpose of this Act is to promote the sustainable management of the environment and the use of natural resources by establishing principles for decision-making on matters affecting the environment; to provide for a process of assessment and control of projects which may have significant effects on the environment; and to provide for incidental matters. The Act gives legislative effect to the Environmental Impact Assessment Policy. Moreover, the act also provides procedure for adequate public participation during the environmental assessment process for the interested and affected parties to voice their opinions and concern about the proposed project.	Cemetery establishment is one of the listed activities
<b>The Regional Councils Act (No. 22 of 1992)</b>	<ul style="list-style-type: none"> <li>This Act sets out the conditions under which Regional Councils must be elected and administer each delineated region. From a land use and project planning point of view, their duties include, as described in section 28 “to undertake the planning of the development of the region for which it has been established with a view to physical, social and economic characteristics, urbanization patterns, natural resources, infrastructure, land utilization pattern and sensitivity of the natural environment”.</li> <li>The main objective of this Act is to initiate, supervise, manage and evaluate development.</li> </ul>	The relevant Regional Council is a stakeholder and was consulted during the EA process. The project site falls under the !Kharas Regional Council
<b>Local Authorities Act (No. 23 of 1992)</b>	<ul style="list-style-type: none"> <li>The main objective of this Act is to initiate, supervise, manage and evaluate development.</li> </ul>	The Lüderitz Town Council is the responsible Local Authority of the area in which the proposed development will be located.
<b>Water Act 54 of 1956</b>	<p>The Water Resources Management Act 11 of 2013 is presently without regulations; therefore, the Water Act No 54 of 1956 is still in force:</p> <ul style="list-style-type: none"> <li>Prohibits the pollution of water and implements the principle that a person disposing of effluent or waste has a duty of care to prevent pollution (S3 (k)).</li> <li>Provides for control and protection of groundwater (S66 (1), (d (ii)).</li> </ul> <p>Liability of clean-up costs after closure/abandonment of an activity (S3 (l)).</p>	Protection of wetlands, surface and groundwater sources and prevention of pollution of such sources.
<b>Water Resources Management Act 2004</b>	This act provides provision for the control, conservation and use of water for domestic,	



	agricultural, urban and industrial purposes. In addition, the Act clearly gives provision that pertain with license or permit that required abstracting and using water as well as for discharge of effluent. The effluent of human waste under this framework is the focus; hence mobile toilets are earmarked to be used to avoid any seepage into existing water course, infiltration into soil etc.	
<b>National Heritage Act No. 27 of 2004</b>	The Act provide for the protection and conservation of places and objects of heritage significance and the registration of such places and objects; to establish a National Heritage Council; to establish a National Heritage Register; and to provide for incidental matters.	Any material of heritage importance that maybe discovered at the site must be reported to the NHC.
<b>Labour Act No. 11 of 2007</b>	135 (f): “the steps to be taken by the owners of premises used or intended for use as factories or places where machinery is used, or by occupiers of such premises or by users of machinery in connection with the structure of such buildings of otherwise in order to prevent or extinguish fires, and to ensure the safety in the event of fire, of persons in such building”.	All labor related issues must be handled in accordance with this Act.
<b>Soil Conservation Act (No 76 of 1969)</b>	The Act makes provision for the prevention and control of soil erosion and the protection, improvement and conservation of soil, vegetation and water supply sources and resources, through directives declared by the Minister.	Duty of care must be applied to soil conservation and management measures must be included in the EMP.
<b>Public and Environmental Health Act, 2015</b>	<p>Section 119 of this Act prohibits the existence of a nuisance on any land owned or occupied by the proponent. The term nuisance is important for the purpose of this EIA, as it is specified, where relevant in Section 122 as follows:</p> <p>any dwelling or premises which is or are of such construction as to be injurious or dangerous to health or which is or are liable to favour the spread of any infectious disease;</p> <p>any dung pit, slop tank, ash pit or manure heap so foul or in such a state or so constructed as to be offensive or to be injurious or dangerous to health;</p> <p>any area of land kept or permitted to remain in such a state as to be offensive, or liable to cause any infectious, communicable or preventable disease or injury or danger to health; or</p> <p>Any other condition whatever which is offensive, injurious or dangerous to health.</p>	The proponent has the mandate to prevent any public health.

<p><b>Atmospheric Pollution Prevention Ordinance No. 11 of 1976</b></p>	<p>This Ordinance generally provides for the prevention of the pollution of the atmosphere and for matters incidental thereto. The Ordinance deals with administrative appointments and their functions; the control of noxious or offensive gases; atmospheric pollution by smoke, dust control, motor vehicle emissions; and general provisions.</p> <p>Part IV of this ordinance deals with dust control. The Ordinance is clear in requiring that any person carrying out an industrial process which is liable to cause a nuisance to persons residing in the vicinity or to cause dust pollution to the atmosphere, shall take the prescribed steps or, where no steps have been prescribed, to adopt the best practicable means for preventing such dust from becoming dispersed and causing a nuisance.</p> <p>Of applicability to the envisaged project, is dust generated by vehicles or equipment as well as dust generated during mining. The risk of dust generation is high at the envisaged site. This deals with air pollution as it affects occupational health and safety, and no consideration is given to the natural environment.</p>	<p>Control all activities that might cause air pollution.</p>
<p><b>Road Traffic and Transport Act, No. 22 of 1999</b></p>	<p>The Act provides for the establishment of the Transportation Commission of Namibia; for the control of traffic on public roads, the licensing of drivers, the registration and licensing of vehicles, the control and regulation of road transport across Namibia's borders; and for matters incidental thereto. Should the Proponent wish to undertake activities involving road transportation or access onto existing roads, the relevant permits will be required.</p>	<p>Mitigation measures should be provided if the roads and traffic impact cannot be avoided. The relevant permits must therefore be applied for.</p>
<p><b>Town Planning Ordinance No. 18 of 1954</b></p>	<p>Subdivision of land situated in any area to which an approved Town Planning Scheme applies must be consistent with that scheme (S31).</p>	<p>The proposed land use of the project site must be consistent with the Lüderitz Town Planning Scheme.</p>
<p><b>Urban and Regional Planning Act No. 5 of 2018</b></p>	<p>This Act aims 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 decentralize certain matters relating to spatial planning; to provide for the</p>	<p>Town Planning procedures should be applied on the proposed development site, upon issuing of the ECC.</p>

	<p>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.</p>	
<p><b>Lüderitz Town Planning Scheme</b></p>	<p>Provide guidelines on different land use zone and allowable activities on each land use category</p>	<p>The Cemetery development site should be zoned "Cemetery" in accordance with the Scheme.</p>

## 4. RESPONSIBILITIES

It is the core responsibility of the Lüderitz Town Council to ensure the successful implementation of this EMP and any conditions to be imposed by the Ministry of Environment, Forestry and Tourism (MEFT). The Proponent may delegate this responsibility at any time, as they deem necessary, from construction and operation & maintenance. However, the implementation of this EMP also requires the involvement of various role players, each with specific responsibilities to ensure that the project is operated in an environmentally sensible manner during all phases of the development.

### 4.1 The Proponent: Lüderitz Town Council

To implement the final EMP document approved by the DEAF before the commencement of the planning phase and to ensure that the proposed development complies with the EMA requirements and the Environmental Authorization.

### 4.2 The Proponent's Representative

#### Responsibilities

- a) Implement the final EMP after approval by DEA and ensure the project comply with the EMP and conditions therein.
- b) Notify MEFT and EAP of any proposed changes to the solid waste disposal site
- c) Appoint an Environmental Control Officer (ECO) to take the following responsibilities:
  - Daily inspections and regular monitoring and review of the on-site environmental management and implementation of the EMP by the maintenance team or contractor.
  - Overall maintenance and control of the site (i.e., fences, gates, etc.).
  - Control the disposal and burning of waste, collection of windblown litter.
  - Keep environmental records, compile and submit quarterly reports to DEA.
  - Provide Environmental training and awareness on the contents of the EMP to all contractors, sub-contractors and employees involved in the development, maintenance and operation of the new cemetery.
  - Ensure the review/update of this EMP as required and renewal of the ECC.
- d) The above responsibilities could be shared among several officials as per their respective job descriptions. However, the overall responsibilities should lie with the Environmental Health Practitioner.

### **4.3 Contractors and sub-contractors**

It is expected that various contractors and sub-contractors will be appointed at various times and for various tasks throughout the life cycle of this project. All appointed contractors shall ensure to comply with the EMP and its conditions. The Municipality must ensure that a copy of the EMP is given to all contractors before commencement of any work at the project. The contractor upon receiving this EMP should ensure:

- To undertake their activities in an environmentally sensible manner and within the context of this EMP.
- To undertake good housekeeping practices during duration of the activities.
- To ensure that adequate environmental awareness training takes place in the language of the employees.

### **4.4 Authorities: Government Ministries**

Various Government Ministries should provide supervisory and monitoring roles to ensure compliance of their respective regulations and laws by renewal or enforcement of respective laws. Of relevance to this project are the Ministry of Urban Rural Development, Ministry of Health and Social Services, Ministry of Environment, Forestry and Tourism.

- Ministry of Urban and Rural Development (MURD) being the line ministry under which all Local Authorities falls, MURD should avail or provide approval thereof for adequate funding and resources to allow the Municipality to carry out the necessary mitigation measures to reduce serious environmental and public health risks associated with the operation of the proposed cemetery.
- Ministry of Health and Social Services (MoHSS) should provide monitoring on the public health and safety issues in town in consultation with the municipal Environmental Health official. Moreover, MoHSS is responsible for all medical waste.
- Ministry of Environment, Forestry and Tourism (MEFT) must conduct environmental compliance monitoring and any instances of non-compliance must be brought to the attention of the municipality, along with recommended measures for rectifying the non-compliance.

## 5. CEMETERY STANDARDS AND OPERATION PROCEDURES

### 5.1 Cemetery facilities

The proposed cemetery should be served with basic facilities as follows

- Buffer zone

Since the proposed development site is located close to existing residential areas, it is highly recommended to establish a buffer zone between the new Cemetery and the residential area (NHE house block). The buffer zone can either be in the form of greenbelt/tree belt or a public park. The new cemetery extent and the buffer zone should be clearly indicated in the updated Lüderitz Town Planning Scheme.

- *Fence, gates, and control measures*

The site should be enclosed in a boundary wall with lockable gates. The site fence and gates will allow access control and prevent trespassing. In many cases, cemetery grounds have been used as hiding places for criminals and drug dealers. As such, provision should be made for a security house at the site entrance. There must be a sign board at the entrance depicting operating hours, and Municipality contact numbers.

- *Ablution facility*

The site should be served with sufficient ablution facility which is connected to the municipal sewage system.

- *Access route and parking zone*

There must be enough access road, walking path and designated parking space within the cemetery. The main access road to the site should be connected to the existing municipal road network.

- *Wall of remembrance or memorial wall*

Provision should be made for the establishment of wall of remembrance or memorial wall to allow interment of the cremated human remains for preservation in a dignified manner.

- *Landscaping*

Locally adaptable plants species should be planted in and around the cemetery ground to improve the aesthetic view of the site. The maintenance of such plants should be part of the day-to-day cemetery maintenance programme.

## 5.2 Operational procedures

The following standards should be ensured during the operation phase

- *Burial ground*

The Cemetery should be established to serve the broad community of Lüderitz which is consisting of different religious and faith groups such as Christians, Bahais, Muslims etc. Due to difference in beliefs, culture etc., between these groups, it is recommended that there must be designated burial site for each group to avoid any conflicts thereof.

- *Cemetery records*

There must be a cemetery register to record all burials that took place in the cemetery. The record should include the deceased names, date of death, date of interment, grave space number and contacts. These records should be kept for the rest of the life span of the cemetery and beyond.

- *Grave sizes and spacing*

Graves should be prepared in accordance with the standard grave spaces as depicted in the table below.

Size	Measurement (LxDxW)
Small	1.5m x 0.8m x 1.5m
Standard	2.4m x 1.8m x 1.00m
Large	3.00m x 1.8.m x 1.5m

In order to ensure suitable utilization of land, a maximum of 1.5 m between graves (either side) should be maintained at all times.

- *Preventative maintenance*

There must be a preventative maintenance schedule of the cemetery infrastructure. Council should be responsible for preventative maintenance aspects such as road maintenance, repair of boundary wall, gates, lights, ablution facility etc. Council should ensure that all use graves and booked grave spaces are numbered and identifiable.

On the other hand, families should be responsible for the maintenance of the graves of their loved ones by ensuring that the graves and headstones are in good condition and that it bears correct names and records of their loved ones at all times.

## **6. ENVIRONMENTAL QUALITY OBJECTIVES**

Environmental performance objectives for the cemetery should include:

- a) Improvement of community relations.
- b) Sound management of interment sites.
- c) Control of buffer zones and perimeter integrity (fencing and access point security).
- d) Maintenance of a visually attractive aesthetic through effective solid waste containment and disposal, and continuous landscaping efforts. In this regard indigenous ornamental and shade trees should be used along with a lawn. Consideration should be given to earthen grave finishes with headstones or commemorative tree rather than concrete slabs as commonly practiced.
- e) Management of surface flows on site.
- f) Sanitary handling and storage of food and beverages intended for human consumption.
- g) Maintenance of a permanent record of the location of each grave site. Locations should be determined by GPS or triangulation survey.

### **6.1 Environmental Awareness Training**

All contractors should ensure that adequate environmental awareness training of senior site personnel takes place and that all construction workers and new employees receive an induction presentation on the importance and implications of the EMP before the work commencing. The presentation should be conducted by the ECO, in the employees' language of choice.

### **6.2 Non-compliance and Penalties**

In case of transgressions and non-compliance to the EMP by the contractors, there should be a penalty fine. Transgressions should be recorded in a register and be kept at the site office for the duration of the project. The resident engineer will issue the penalties in terms of the severity of the environment.

Adherence to this EMP during construction will ensure that the environmental impacts associated with the proposed development will be mitigated to a greater extent thus promoting sustainable development. The commitment and co-operation of the identified responsible person(s) will ensure effective implementation of the EMP pre-construction and post-construction.



## 7. PROPOSED MITIGATION MEASURES

Table 2: Proposed Mitigation Measures during Planning and Construction Phase

Environmental Issue/Impacts	Mitigation Measures	Roles and Responsibilities	
		Implementation	Monitoring
<b>Legal compliance</b>	<ul style="list-style-type: none"> <li>Following procedure listed under Section 5 (5.1)</li> </ul>	ECO	
<b>Impact on Vegetation</b>	<ul style="list-style-type: none"> <li>The site has little to no vegetation, hence the impact is minimal</li> <li>Only vegetation within the development site maybe cleared</li> </ul>	Contractor	ECO
<b>Impact on fauna</b>	<ul style="list-style-type: none"> <li>Disturbances should be limited to the construction site</li> <li>No animal must be trapped, killed for any purpose on site.</li> </ul>	Contractor	ECO
<b>Visual intrusion/ aesthetic impacts</b>	<ul style="list-style-type: none"> <li>Ensure regular collection of waste from the site</li> <li>Construction materials should be properly stacked and store in enclosed areas i.e., containers</li> </ul>	Contractor	ECO
<b>Disturbance and contamination of Soil</b>	<ul style="list-style-type: none"> <li>Avoid excessively disturbance of soil by setting designated access roads</li> <li>Minimize soil exposure time during construction</li> <li>All leaks and spillage of oil should be contained and disposed of at the Municipal dumpsite</li> <li>Vehicles with leaks should be fitted with drip trays</li> <li>from vehicles, machineries etc., should be contained and contaminated soil must be collected and disposed of at the Municipal dumpsite.</li> </ul>	Contractor	ECO
<b>Impact on Air quality</b>	<ul style="list-style-type: none"> <li>Avoid excessive dust by sprinkling the construction site with water regularly.</li> <li>Ensure proper maintenance of vehicles and equipment to minimize release of fumes and other pollutants in the air.</li> <li>Mix construction material in an enclosed space.</li> <li>Cover construction material during transportation.</li> <li>Prohibit open burning of waste onsite</li> </ul>	Contractor	ECO

<b>Noise and vibration</b>	<ul style="list-style-type: none"> <li>Abide by the time and noise limits specified in Noise Control Regulations.</li> <li>Provide employees with Personal Protective Equipment (i.e., earmuffs)</li> <li>Construction should be restricted to daytime and no operation during odd hours</li> </ul>	Contractor	ECO
<b>Impact on water and drainage</b>	<ul style="list-style-type: none"> <li>Avoid major drainage lines and watercourses.</li> <li>Ensure drainage of storm water.</li> </ul>	Contractor	ECO
<b>Waste generation</b>	<ul style="list-style-type: none"> <li>Provide waste collection bins</li> <li>General waste should be collected regularly and disposed of at the Municipal landfill site</li> <li>Building rubble maybe re-used as filling materials</li> <li>Identify all recyclable waste and hand them over to recycling companies</li> </ul>		ECO
<b>Traffic impact</b>	<p>Include in bidding documents that the contractor should:</p> <ul style="list-style-type: none"> <li>Limit the use of vehicles to the site and avoid unnecessary trips during rush hour.</li> <li>Set up a time schedule for transporting construction material with the purpose of avoiding traffic congestion.</li> </ul>	Contractor	ECO
<b>Public health and Safety provision</b>	<ul style="list-style-type: none"> <li>The construction site must be barricade and out of bound for people</li> <li>All employees working in dusty areas must be provided with personal protective equipment like dust masks.</li> <li>Proper signage must be used at the construction site.</li> <li>Provision of firefighting measures in accordance with Labor Act</li> <li>Appoint Safety Officer in accordance with Labor Act</li> <li>Always provide fencing around the construction site.</li> </ul>	Contractor	ECO
<b>Impact of temporary construction camps</b>	<ul style="list-style-type: none"> <li>One sanitary facility (1 toilet with shower, 1 washing basin, 1 urinal) per 25 workers</li> <li>Sanitary facilities to be covered, easily accessible, ventilated, well lit, maintained and sanitized.</li> <li>Ensure safe drinking water is available for all employees.</li> </ul>	Contractor	ECO
<b>Archaeological resources</b>	<ul style="list-style-type: none"> <li>Should there be any suspected archaeological findings during construction, it must be reported to the NHC in accordance with National Heritage Act.</li> </ul>	Contractor	ECO

**Table 3: Proposed Mitigation Measures during Operational phase**

Environmental Issue/Impacts	Mitigation Measures	Roles and Responsibilities	
		Implementation	Monitoring
Legal compliance	<ul style="list-style-type: none"> <li>Ensure procedures out line in Section 5 (5.2)</li> </ul>	ECO	
<b>Impact on water sources</b>	<ul style="list-style-type: none"> <li>No direct discharge of pollution (wastewater or solid waste) into watercourse</li> <li>Ensure that sanitary facilities are frequently cleaned and regularly monitored.</li> <li>Do not store dangerous goods i.e., fuel on site.</li> <li>Monitor sewer connection and ensure adherence to international and national standards.</li> <li>Divert all storm water flows away from the grave spaces by erecting erosion work</li> <li>Oil or lubricant spills and leaks from vehicles, machineries etc., should be contained and contaminated soil must be collected and disposed of at the Municipal dumpsite.</li> </ul>	ECO	MAWLR
<b>Impact Biodiversity</b>	<ul style="list-style-type: none"> <li>Plant trees and other indigenous plants in the cemetery to enhance biodiversity</li> </ul>	ECO	
<b>Waste generation</b>	<ul style="list-style-type: none"> <li>Provide waste collection bins in the cemetery and ensure regular collection</li> <li>Excess sand from graves should be collected regularly and maybe used as filling materials</li> <li>Grave building contractors should be informed on the proper waste procedures</li> <li>Encourage waste segregation through a 3bin system (Tins, Paper, Plastics)</li> <li>Encourage recycling of waste.</li> </ul>	ECO	
<b>Traffic impact</b>	<ul style="list-style-type: none"> <li>Maintenance of road signs.</li> </ul>	ECO	NAMPOL

	<ul style="list-style-type: none"> <li>• Ensure enough access road within the cemetery</li> <li>• Make provision for an ample parking space within or around the cemetery</li> <li>• Provide traffic control during funeral services.</li> </ul>		
<b>Public Health and Safety</b>	<ul style="list-style-type: none"> <li>• Appoint a Safety Officer who should monitor all health and safety issues.</li> <li>• Ensure general cleanliness of the building, most importantly the sanitary facilities</li> <li>• Develop Cemetery Regulations in terms of grave depth, covering of graves, exhumation of human remains in line with the World Health organization standards.</li> </ul>	ECO	MoHSS
<b>Visual impacts</b>	<ul style="list-style-type: none"> <li>• Ensure good housekeeping of the site</li> <li>• Provide maintenance and repair of the cemetery infrastructure</li> <li>• Provide good maintenance of the surrounding landscape by ensuring pruning of trees, watering and care of plants, remove weeds and unwanted vegetation etc.</li> </ul>	ECO	
<b>Employment opportunities (+ve)</b>	<ul style="list-style-type: none"> <li>• Give priority to local people</li> <li>• Provide opportunities to local people through grave digging, cleaning, landscaping services, etc.</li> </ul>	ECO	
<b>Crime</b>	<ul style="list-style-type: none"> <li>• Provide security on-site to curb all crime-related activities.</li> <li>• All access points (gates) must be closed after hours.</li> <li>• Provide lights in the cemetery.</li> </ul>	Municipality *(Cemetery caretaker)	ECO
<b>Social acceptability</b>	<ul style="list-style-type: none"> <li>• Make provision for all religious groups</li> <li>• Maintain cemetery ground in accordance with various religious beliefs i.e., Christians, Bahais, Muslims etc.</li> </ul>	ECO	

## 8. CONCLUSION

All possible environment aspects have been adequately assessed and necessary control measures have been formulated to meet statutory requirements. Thus, implementing this project will not have any significant negative impacts. The proposed mitigation measures are presented in this EMP. Based on the findings of this EIA study and proposed mitigation measures outlined in this EMP, Green Gain Consultants cc is confident that it will not result in appreciable environmental impacts, provided that this EMP is implemented and that all the legal requirements pertaining to this development are complied with.

Upon approval by the authorities, this EMP shall be considered legally bidding and any deviation or transgression is punishable by law as per the Environmental Management Act, No. 07 of 2007. A copy of this EMP shall be always kept by the proponent or responsible official/department.

Although the implementation of this EMP requires a multitude of administration, the proponent should play a pivotal role in its implementation. The Lüderitz Town Council should ensure proper coordination with other stakeholders and may provide training to all parties involved when necessary. The proponent should also ensure to avail necessary resources (i.e., human, financial, etc.) and synergies the implementation of this EMP.