

Environmental & Social Impact Assessment for The Upgrade to Low Volume Seal (LVS) Standard of The DR3616 Tsandi-Onesi-Epalela Road (48.3km) In Omusati Region Namibia

Environmental and Social Management Plan (ESMP)

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Prepared for DAT JV











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ACRONYMS

TERMS	DEFINITION	
BID	Background Information Document	
DR	District Road	
EAP	Environmental Assessment Practitioners	
ECC	Environmental Clearance Certificate	
ECO	Environmental Control Officer	
EIA (R)	Environmental Impact Assessment (Report)	
ESIA	Environmental and Social Impact Assessment	
ESMP	Environmental and Social Management Plan	
GHGs	Greenhouse Gasses	
ISO	International Organization for Standardization	
I&Aps	Interested and Affected Parties	
MAWF	Ministry of Agriculture Water and Forestry	
MEFT: DEA	Ministry of Environment, Forestry and Tourism's	
	Directorate of Environmental Affairs	
NHC	National Heritage Council	
NEMA	Namibia Environmental Management Act	
RA	Roads Authority	
ToR	Terms of Reference	
UNFCCC	United Nations Framework Convention on Climate Change	

DEFINITION OF TERMS

The 'Consultant' – this refers to the team that is conducting the ESIA and the preparation of the EMP for the development

The **'Proponent** – this refers to the institutions/departments that are directly involved in the implementation of the project, i.e. MAWF.

The 'Stakeholders' – this refers to the people, organisations, NGOs that are directly or indirectly affected and interested by the project.

The 'Environment' – this refers to the ecology, economy, society and politics.

1. CHAPTER ONE: BACKGROUND

1.1. Overview

Roads Authority (RA) of Namibia (the Proponent) intends to upgrade the DR 3616 road to bitumen standard. As such RA appointed DAT JV to undertake the preliminary and detailed design, tender documentation, contract administration and full-time site supervision for the upgrading to Low Volume Seal (LVS) standards of District Road 3616 (DR3616) between Epalela, Onesi and Tsandi in the Omusati Region.

The present state of the road is gravel standard. The road is stated to have about 269 vehicles per day which is considered high for a gravel road according to the 2020 RMS data received from ad-hoc station no. 271 with a split of 84:16 light to heavy vehicles. The objective of the project is to upgrade the existing link to an all-weather two-lane single carriageway LVS standard which will serve the purpose to:

- Improve local rural and regional accessibility;
- Reduction of road user costs;
- Reduction of travel times;
- Reduction of maintenance costs and frequency.

The upgrade is intended to follow the existing alignment as far as practicable to limit the impact on the environment.

In order for the road upgrade and its associated activities to commence, in terms of the Namibian environmental legislation (Environmental Management Act (No. 7 of 2007 and the Environmental Impact Assessment Regulations of 2012), an EIA is required to obtain an Environmental Clearance Certificate from the Ministry of Environment and Tourism (MET) before the project can proceed. This is because Under the 2012 Environmental Impact Assessment (EIA) Regulations of the Environmental Management Act (EMA) No. 7 of 2007, the proposed development is a listed activity that may not be undertaken without an Environmental Clearance Certificate (ECC). This activity is listed under the following relevant sections:

Table 1:Listed Activities - Environmental Management Act No. of 2007

	3: Mining and Quarrying Activities			ivities	10: Infrastructure
3.3 Resource extraction, manipulation,		manipulation,	10.1 The construction of-		
	cons	ervation an	d related acti	vities	(b) public roads

Furthermore, as per the requirements of the Environmental Management Act No. 7 of 2007, Roads Authority has appointed EnviroPlan Consulting cc to conduct an Environmental and Social Impact Assessment (ESIA) and develop an Environmental & Social Management Plan (ESMP) for the proposed project.

This has been followed by an application for an Environmental Clearance Certificate (ECC) to the Ministry of Environment and Tourism (MET): Directorate of Environmental Affairs (DEA).

In this respect, this document forms part of the application to be made to the DEA's office for an Environmental Clearance Certificate (ECC) for the proposed upgrade to LVS Standard of the DR3616 road and abstraction of construction materials. The document is compiled in accordance with the guidelines and statutes of the Environmental Management Act No.7 of 2007 and the environmental impacts assessment regulations (GN 30 in GG 4878 of 6 February 2012).

1.2. The Environmental Consultant

The Roads Authority has appointed DAT JV as the engineer to design and supervise the proposed road upgrade project. DAT JV subsequently appointed EnviroPlan Consulting CC (EnviroPlan hereafter), on behalf of the Roads Authority, as the independent environmental consultant conducting the EA for the proposed activity.

Tendai E. Kasinganeti, a qualified Environmental Assessment Practitioner (EAP) conducted this EA process. The CVs of the consultants are attached as Appendix A at the end of this report.

1.3. Project Location

The district road DR3616 links the settlement of Epalela and the township of Tsandi via Onesi in the Omusati Region. The road starts (chainage 0+000) at a T-junction intersection with Main Road 92 (MR92) which links Ondangwa to Ruacana and ends at a T-junction intersection with Main Road 123 (MR123) (chainage 48+300) which links the Omusati Regional capital of Outapi to Okahao. The existing road was thus measured and determined to be approximately 48.3 km long.

Please refer to the map below (Fig 1) giving a locality layout of the site:

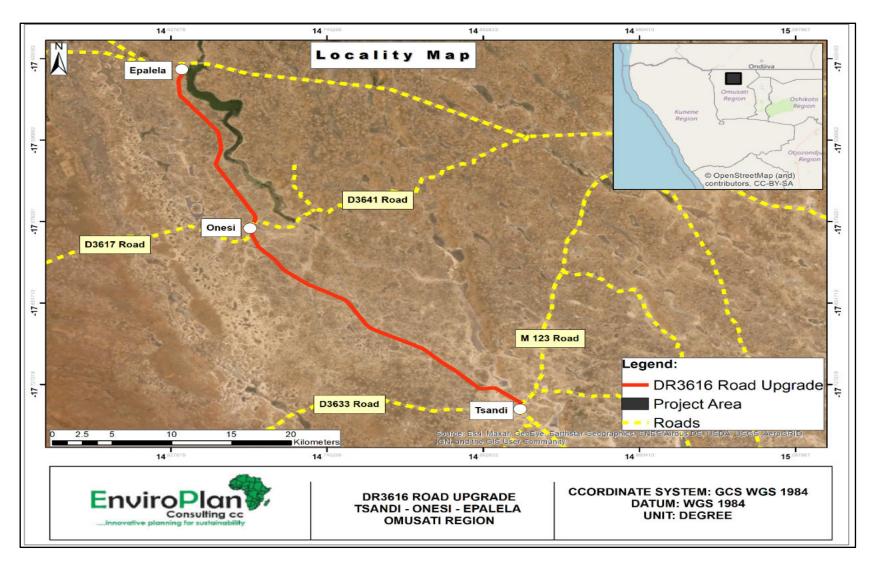


Figure 1: DR 3616 Route Locality.

1.4. Road characteristics

The subject road is a gravel-surfaced road and it will be upgraded to bitumen standard road. The project road is approximately 48 km in length. The road is generally flat, with occasional dips where there are Oshanas. The subject road details are stipulated in below

Table 2: Project Details

Length of Road	48 km	
Road reserve	15 m from the Centre Line	
Regional Administration	Omusati	
Towns and settlements	Epalela, Onesi, Tsandi	
erviced by the road		

1.5. Materials Requirements

Construction materials for gravelling and construction will be obtained from four identified borrow pits (described in detail in the ESR). BP 1 and 4 are existing and in us whilst BP 2 and 3 will be on completely new sites. The abstraction of materials will be in a way that reduces the burrow pit slopes and allow for rehabilitation as well.

2. CHAPTER TWO: POLICY, LEGAL AND ADMINISTRATIVE FRAMEWORK

2.1. Introduction

An important part of the ESMP is identifying and reviewing the administrative, policy and legislative situation concerning the proposed activity, to inform the proponent about the requirements to be fulfilled in the project development and implementation. This section looks at the legislative framework within which the proposed project will operate under. The focus is on the compliance with the legislation during the planning, construction and operational phases. All relevant legislations, policies and international statutes applying to the project are highlighted in table 2 below as specified in the Environmental Management Act, 2007 (Act No.7 of 2007) and the regulations for Environmental Impact Assessment as set out in the Schedule of Government Notice No. 30 (2012).

The pursuit of sustainability by an Organisation is operationalised by a sound policy and legislative framework that gives operating parameters within its sphere of operation. In this section, relevant legal instruments as well as their relevant provisions are identified and analysed on their relevance to the proposed project. A concise explanation is given on applicability on each of the identified piece of legislation as well as how Roads Authority is supposed to implement environmental compliance to the project.

Table 3: Policies, legal and administrative regulations

Aspect	Legislation
The Constitution	Namibian Constitution First Amendment Act 34 of 1998
Archaeology	National Heritage Act 27 of 2004
	National Monuments Act of Namibia (No. 28 of 1969) as amended until 1979
Environmental	Environmental Management Act 7 of 2007
	EIA Regulations GN 57/2007 (GG 3812)
	National Solid Waste Management Strategy
	Pollution and Waste Management Bill (draft)
	National Waste Management Policy
	Soil Conservation Act 76 of 1969
	Hazardous Substance Ordinance (No. 15 of 1973)
	Atmospheric Pollution Prevention Ordinance, 1976
	National Policy on Climate Change for Namibia, 2010
	National Biodiversity Strategy and Action Plan (NBSAP2)
Forestry	Forest Act 12 of 2001
Water	Water Act 54 of 1956
	Water Resources Management Act, 2013 (Act No. 11 of 2013)
Health and Safety	Labour Act (No 11 of 2007) in conjunction with Regulation 156, 'Regulations Relating to the Health and Safety of Employees at work'.
	Public Health and Environmental Act, 2015
Services and	Road Ordinance 1972
Infrastructure	(Ordinance 17 Of 1972)

3. CHAPTER THREE: ENVIRONMENTAL MANAGEMENT PLAN (EMP)

3.1. EMP Organisation, Responsibility And Authority

This section describes the key functionaries in the planning, implementation and monitoring of the EMP. Copies of this EMP shall be kept at the site office and will be distributed to all senior contract personnel. All senior personnel shall be required to familiarise themselves with the contents of this document.

The implementation of this EMP requires the involvement of several stakeholders, each fulfilling a different but vital role to ensure sound environmental management during each phase.

3.1.1. Site instruction entries

The Site Instruction Book entries will be used for the recording of general site instructions as they relate to the works on site and EMP measures. It will also be used for the issuing of stop-work orders issued by the ECO for the purposes of immediately halting any particular activities of the Contractor in lieu of the environmental risk that they may pose.

3.1.2. ECO diary entries

The purpose of these entries will be to record the comments of the ECO as they relate to activities on the site including infringements, possible changes to the EMP or work stop orders.

3.1.3. Method statements

Method statements from the Contractor will be required for specific sensitive actions on request of the authorities or ESM. A method statement forms the baseline information on which sensitive area work takes place and is thus considered a "live document" in that modifications can be negotiated between the Contractor and EC if or as required. The Contractor (and, where relevant, any subcontractors) must also sign the Method Statement, thereby indicating that the works will be carried out according to the approved methodology. Changes in the methodology must be reflected by amendments to the original approved Method Statement. Amendments must be signed by both the EC and RE, denoting that the change is environmentally acceptable. The Contractor must also sign the amended Method Statement.

All method statements will form part of the EMP documentation and are subject to all terms and conditions contained within the EMP main document. The Method Statement shall cover applicable details with regard to:

- Construction procedures;
- Materials and equipment to be used;
- How and where materials will be sourced and stored;

- The containment of accidental leaks or spills;
- Timing and location of activities; and
- Any other information deemed necessary by the ESM.

The Contractor must submit the method statement two weeks before any particular construction activity is due to start, especially with respect to impacts on sensitive ecosystems. Work may not commence until the method statement has been accepted by the EC and Engineer, and clearly communicated to the workforce. The Contractor shall, except in the case of emergency activities, allow 14 days for consideration and approval of the Method Statement. The RE or EC may require changes to a Method Statement if the proposal does not comply with the specifications or if, in the reasonable opinion of the RE or ESM, the proposal may result in damage to the environment in excess of that permitted by the specifications. Approved Method Statements shall be communicated to all relevant personnel.

All Method Statements listed below, shall be provided by the Contractor before the activity commences:

(i) <u>Bunding</u>

Method of bunding for static plant and bulk fuel storage.

(ii) <u>Camp establishment and fencing</u>

- Location and layout of the Contractor's Camp.
- Method of installing fences required for working areas and Contractor's Camp.

(iii) <u>Concrete batching</u>

Location, layout and preparation of concrete batching facilities, including the methods employed for mixing of concrete including the management of runoff water from such areas.

(iv) Bulk earthworks

Location, layout, silt/sediment management and the management of runoff from bulk earthworks areas.

(v) <u>Demolition</u>

Proposed method of demolition, including handling and disposal of materials.

(vi) <u>Dust</u>

Dust control protocol.

(vii) Fire and hazardous substances

- Handling and storage of hazardous wastes.
- Emergency spillage procedures and compounds to be used.
- Emergency procedures for accidental fire.
- Methods for the disposal of hazardous materials.

(viii) Fuels and fuel spills

- Methods of refuelling vehicles.
- Details of methods for fuel spills and clean-up operations.

(ix) Protection of archaeological resources

Methods for dealing with archaeological resources in the event that any are found.

(x) Protection of environmentally sensitive resources (fauna and flora)

- Methods for dealing with conservation areas or areas identified as environmentally sensitive requiring protection.
- Locality and preparation of onsite nursery to house vegetation relocated from construction areas or propagated locally for replanting purposes.
- Details of methods dealing with the identification, transportation and transplanting of flora species of conservation value.
- Details of methods dealing with the identification, capture and relocation of fauna species of conservation value.

(xi) <u>Rehabilitation</u>

Rehabilitation of disturbed areas and borrow pits after construction is complete.

(xii) Settlement ponds and sumps

Layout and preparation of settlement ponds and sumps.

(xiii) Solid waste management

Solid waste control and removal of waste from Site.

(xiv) Sources of materials

Details of materials imported to the Site (where applicable).

(xv) Topsoil handling and stockpiling

Details on stripping, handling and stockpiling of topsoil.

(xvi) Wash areas

Location, layout, preparation and operation of all wash areas.

(xvii) Storm water management

Details of how storm water is to be handled on Site.

3.2. Environmental Education

Before any work is commenced on the Site, the entire Contractor's staff including foremen shall attend an environmental education talk, presented by the EC with the assistance of the Contractor. The Contractor shall liaise with the EC prior to the commencement date to fix a date and venue for the talk. The Contractor shall ensure that all the employees attend the talk.

Follow-up education talks shall be held for any new employee/s coming onto Site from time to time. The EC shall ensure that all attendees sign an attendance register, and shall provide the ECO with a copy of the attendance register.

3.3. Record Keeping

All records related to the implementation of this management plan (e.g. site instruction book, ECO diary, induction records, method statements) must be kept together in an office where it is safe and can be retrieved easily. All relevant records should be kept for a minimum of two years after construction and should at any time be available for scrutiny by any relevant authority or stakeholder.

It is recommended that photographs (fixed point photographs for better comparisons before/during/after) are taken of the site prior to, during and immediately after construction as a visual reference. These photographs should be stored with related documents and other records related to this EMP.

3.4. Environmental Completion Statement

An Environmental Completion Statement will be prepared by the EC for submission to the Department of Environmental Affairs (Ministry of Environment and Tourism) indicating completion of the project and compliance with the EMP and conditions. This statement will be prepared after the final audit after the rehabilitation phase.

3.5. Roles And Responsibilities

3.5.1. Duties and Powers of the Environmental Consultant (EC)

The Environmental Consultant is ultimately responsible for:

- The environmental and social consultant will be responsible for the periodic monitoring and evaluation of EMP implementation.
- Assisting the Contractor in finding environmentally responsible solutions to problems.
- Monitoring the undertaking by the Contractor of environmental awareness training for all new personnel coming onto site.
- Advising on the removal of person(s) and/or equipment not complying with the specifications via the RE.
- Auditing the implementation of the EMP and EMP compliance on a monthly basis.

- Undertaking a continual review of the EMP and recommending additions and/or changes to the document.
- The management and continuous monitoring of the implementation of the EMP on a daily basis will be the responsibility of the Resident Engineer.

3.5.2. Duties and Powers of the Resident Engineer

The Resident Engineer is ultimately responsible for:

- The Resident Engineer (RE) of the Consulting Team will act with restricted powers and responsibilities as delegated by the Engineer in writing.
- For this project it is envisioned that the function of the Environmental Control Officer (ECO) will only require part time inputs. The RE may fulfil the function of the ECO thereby taking responsibility of the ECO's duties (see below) on this project.
- Any on-site decisions regarding environmental management are ultimately the responsibility
 of the RE with consultation with the environmental Consultant. Therefore, the RE must
 assign the role of ECO to a competent member of its site supervising team. The RE shall
 assist the ECO where necessary and will have the following responsibilities in terms of the
 implementation of this EMP:
 - Ensuring that the necessary environmental authorisations and permits have been obtained by the Contractor.
 - Assisting the Contractor in finding environmentally responsible solutions to problems with input from the ECO where necessary.
 - Ordering the removal of person(s) and/or equipment not complying with the EMP specifications.
 - Issuing fines for transgressions of site rules and penalties for contravention of the EMP.

3.5.3. Duties and Powers of the Environmental Control Officer

The Environmental Control Officer (ECO) will be a competent person determined by the RE to fulfil the role as the Employer's representative to monitor and review the on-site environmental management and implementation of this EMP by the Contractor.

The ECO's duties will include the following:

- Assisting the RE in ensuring that the necessary environmental authorisations and permits have been obtained.
- Maintaining open and direct lines of communication between the RE, Employer, Contractor, and interested and affected parties with regard to environmental matters.
- Facilitating all communication between the local community and the contractor.
- Regular site inspections of all construction areas with regard to compliance with the EMP.
- Monitoring and verifying adherence to the EMP by verifying that environmental impacts are kept to a minimum.
- Taking appropriate action if the specifications are not followed.

• Recommending the issuing of fines for transgressions of site rules and penalties for contraventions of the EMP via the RE.

3.5.4. Duties of the Contractor

The contractor shall be responsible for the implementation of the EMP and the action plan, onsite monitoring and evaluation of the EMP through the following;

On the on-set of the project, the contractor through an Environmental Officer shall:

- Develop a Hazard Identification and Risk Assessment report on the on-set of the project to be approved by the environmental Consultant.
- Developing a waste and contractors camp management plan to be approved by the environmental consultant
- Submit a monthly Environmental Performance report to the Environmental Consultant.

In addition, the Contractor shall furthermore ensure that adequate environmental awareness training of senior site personnel takes place and that all construction workers receive an induction presentation on the importance and implications of the EMP.

The presentation shall be conducted, as far as is possible, in the employees' language of choice.

As a minimum, training should include:

- Explanation of the importance of complying with the EMP.
- Discussion of the potential environmental impacts of construction activities.
- The benefits of improved personal performance.
- Employees' roles and responsibilities, including emergency preparedness.
- Explanation of the specifics of this EMP and its specification (no-go areas, etc.) and of the mitigation measures that must be implemented when carrying out their activities.
- Explanation of the management structure of individuals responsible for matters pertaining to the EMP.
- The contractor shall keep records of all environmental training sessions, including names, dates and the information presented.

The induction programme should be developed and submitted to the RE and environmental consultant for approval.

NB: The Contractor shall clearly describe the overall methodology proposed for the task specific related activities in particular method statements.

All method statements must take environmental requirements into account.

3.6. Financing Of Environmental Control

Financing of the environmental requirements as outlined in this document, apart from the appointment of the ESM and specialists, is the sole responsibility of the Contractor appointed by RA.

Therefore, it is accepted that the cost incurred for implementing this EMP by the Contractor would be allocated for in the tender document. Any responsibilities not defined in this document or where any uncertainties arise in this matter will be the responsibility of RA.

3.7. Amendments Of The EMP

Any party involved with the project can suggest changes to the EMP via the EC or RE. Such suggestions will be discussed with the Environmental Forum. Approved changes will be minute and drafted into the existing EMP in the form of an appendix or amendments.

3.8. Procedures for non-compliance

The Contractor shall comply with the environmental specifications and requirements on an ongoing basis and any failure on his part to do so will entitle the RE to impose a penalty. This applies to the Environmental Management Plan (EMP).

In the event of non-compliance, the following recommended process shall be followed:

- The RE shall consult the environmental consultant and if agreed, issue a notice of non-compliance to the Contractor, stating the nature and magnitude of the contravention. A copy shall be provided to the ECO.
- The Contractor shall act to correct the non-conformance within 24 hours of receipt of the notice, or within a period that may be specified within the notice.
- The Contractor shall provide the RE with a written statement describing the actions to be taken to discontinue the non-conformance, the actions taken to mitigate its effects and the expected results of the actions. A copy shall be provided to the ECO.
- In the case of the Contractor failing to remedy the situation within the predetermined time frame, the RE shall impose a monetary penalty based on the conditions of contract.
- In the case of the Contractor being unable to remedy the situation due to permanent environmental damage already incurred, the RE shall impose a monetary penalty based on the conditions of contract.
- In the case of non-compliance giving rise to physical environmental damage or destruction, the RE shall be entitled to undertake or to cause to be undertaken such remedial works as may be required to make good such damage and to recover from the Contractor the full costs incurred in doing so.
- In the event of a dispute, difference of opinion etc, between any parties in regard to or arising out of interpretation of the conditions of the EMP, disagreement regarding the implementation or method of implementation of conditions of the EMP etc., any party shall be entitled to require that the issue be referred to independent specialists for determination.

• The RE shall at all times have the right to stop work and/or certain activities on site in the case of safety and EMP non-compliance or failure to implement remediation measures.

3.9. Fines and Penalties

The following fines and penalties are in place for transgressions listed below. It will be issued after the procedure in Section 7.6 has been duly followed and only in severe cases and after repeated non-compliance. The graveness of the transgression is justified by each specific penalty.

FINES

Fines may be issued per incident at the discretion of the RE. Such fines will be issued in addition to any remedial costs incurred as a result of noncompliance with the EMP. The RE will inform the Contractor of the contravention and the amount of the fine, and will deduct the amount from monies due under the Contract.

Fines for the activities detailed below, will be imposed by the RE on the Contractor and/or his Subcontractors.

Any persons, vehicles, plant, or thing related to the Contractors operations within the designated boundaries of a "no-go" area.	N\$2,000
Any vehicle guilty of reckless driving on and in the vicinity of the site, including excessive speeds.	N\$1,000
Any vehicle being driven and items of plant or materials being parked or stored outside the demarcated boundaries of the site.	N\$2,000
Persons repeatedly walking outside the demarcated boundaries of the site.	N\$1,000
Persistent and un-repaired spilling of hazardous materials and materials causing pollution.	N\$3,000
Persistent littering on site.	N\$500

Individuals repeatedly not making use of the designated toilet facilities. N\$200

Disposal of waste other than agreed on in the waste management plan. N\$5,000

Deliberate lighting of illegal fires on site (e.g. outside of the designated camp N\$2,000 site).

For each subsequent similar offence the fine may, at the discretion of the RE, be doubled in value.

The RE shall be the judge as to what constitutes a transgression in terms of this document.

Where the Contractor inflicts non-repairable damage upon the environment or fails to comply with any of the environmental specifications, he shall be liable to pay a penalty fine over and above any other contractual consequence.

The Contractor is deemed NOT to have complied with this specification if:

- within the boundaries of the site, site extensions and haul/ access roads there is evidence of contravention of the specification; environmental damage due to negligence;
- Safety of contractor personnel and public being compromised due to negligence;
- the Contractor fails to comply with corrective or other instructions issued by the Engineer within a specific time;
- the Contractor fails to respond adequately to complaints from the public; and
- Payment of any fines in terms of the contract shall not absolve the offender from being liable from prosecution in terms of any law.

The RE will be responsible for a report on the non-repairable damage and / or non-compliance with visual and other evidence as well as issuing the penalty to the contractor with the report attached.

A copy must be handed to the ECO.

Table 4:The following penalties are suggested for transgressions:

Actions leading to erosion:	A penalty equivalent in value to the cost of rehabilitation plus 20%.		
Oil spills:	A penalty equivalent in value to the cost of clean-up operation plus N\$1,000.		
Damage to indigenous vegetation:	A penalty equivalent in value to the cost of restoration plus N\$2,000.		
Damage to trees:	A penalty to a maximum of N\$5,000 shall paid for each tree removed without prior permission, or a maximum of N\$2,000 for damage to any tree, which is to be retained on site.		
Damage to indigenous vegetation:	A penalty equivalent in value to the cost of restoration operation plus N\$2,000.		
Damage to sensitive environment:	A penalty equivalent in value to the cost of restoration operation plus 20%.		
Damage to cultural sites:	A penalty to a maximum of N\$100,000 shall be paid for any damage to any cultural historical site.		
Damage to natural fauna:	A penalty to a maximum of N\$2,000 for damages to any natural occurring animal.		
Accident due to safety negligence:	A penalty to a maximum of N\$50,000 for injuries to personnel or public.		

4. CHAPTER FOUR: ENVIRONMENTAL MANAGEMENT PLAN

4.1. Planning and Design Phase

ENVIRONMENTAL MANAGEMENT IMPACTS REQUIRING MITIGATION	SOURCES OF IMPACTS	MITIGATION MEASURES	MONITORING ACTIONS AND METHODS	RESPONSIBILITY FOR IMPLEMENTATION
High unemployment rates.	'Outsiders' are often given the employment opportunities. Gender inequality.	During drafting of tender documents, the consultant shall include provisions designed to maximise the use of local labour. All unskilled labour shall be sourced from local communities. Specific recruitment procedures shall be spelled out. At least 25% of recruits must be women.	Ensure that contractors that tender make provision for detailed recruitment plan in there tender application	Engineering Consultant in partnership with the constituency councilor will determine employment considerations.
Health and social pathology.	 Increased prostitution and associated social pathologies and health risks Sex workers are hired from the local communities by the construction team. 	 Prior to commencing construction, the risk of an increase in the spread of HIV/AIDS should be explained to regional health authorities and partners be identified amongst all stakeholders to formulate a joint programme to limit the spread of HIV during the construction period. Particular provisions shall be worked into the tender documents for the contractor to approach the Ministry of Health and Social Services to co-opt a health officer to facilitate HIV/AIDS education programmes periodically on site. 	Ensure that contractors that tender make provision for the coopting of an HIV/AIDS health officer from the regional health office in their tender application	Consulting engineer in partnership with National and Regional HIV task forces and NGO's working in the field
	 Health and safety risks to the workers and public due to uncontrolled access to the public during construction Unsafe traffic conditions 	Prior to construction all construction workers should undergo environmental induction.	Ensure that contractors that tender make provision for environmental induction in their tender applications	EC

ENVIRONMENTAL MANAGEMENT IMPACTS REQUIRING MITIGATION	SOURCES OF IMPACTS	MITIGATION MEASURES	MONITORING ACTIONS AND METHODS	RESPONSIBILITY FOR IMPLEMENTATION
	The lack of personal protective clothing, etc.			
Hazardous road conditions	 Obstacles in road as a result of construction activity. Changes in design speeds Road detours 	Design an information campaign to sensitise the general community with regard to the increased design speeds along the road and general road works.	Ensure that contractors that tender make provision for an information campaign in their tender application	EC
Conflict	 Nuisances caused by the building contractor Lack of communication between contractor and community 	 A meeting should be arranged with the local community once the contractor has been appointed. The contractor shall appoint an ECO from the construction team to take responsibility for the implementation of all provisions of this EMP. 	Ensure that contractors that tender make provision for the appointment of an ECO in their tender application Arrange a meeting once contractor has been appointed	CE, EC, ECO

4.2. Construction phase

ENVIRONMENTAL MANAGEMENT IMPACTS REQUIRING MITIGATION SOCIAL ENVIRONMENT	SOURCES OF IMPACTS	MITIGATION MEASURES	MONITORING ACTIONS AND METHODS	RESPONSIBILITY FOR IMPLEMENTATION
Conflict.	 Communities dissatisfied with the activities Nuisances caused by the building contractor 	 Clear communication between contractor and community and farmers, on the schedule/timeframe for operations and the duration of the construction phase. This should be provided for in the form of a Public Consultation Plan (PCP) which should include at least: One meeting for site-handover and to introduce the local community and farmers to the Contractor A system for the on-going management of the communication between the Contractor and local community and farmers, which should include:	 Minutes of meetings Draw up PCP 	RE, EC and Contractor

ENVIRONMENTAL MANAGEMENT IMPACTS REQUIRING MITIGATION	SOURCES OF IMPACTS	MITIGATION MEASURES	MONITORING ACTIONS AND METHODS	RESPONSIBILITY FOR IMPLEMENTATION
SOCIAL ENVIRONMENT				
		 Ensure that relevant stakeholders are adequately informed throughout construction and that there is effective communication with and feedback to the RE and client. The contractor shall appoint a person from the construction team to take responsibility for the implementation of all provisions of this EMP. 	Meetings and communication.	RE, EC and Contractor.
	Delayed construction, which has cost implications and causes low user satisfaction.	Programme delays into the schedule and communicate this to the community.	 RE and Contractor to constantly monitor delays and adapt programme accordingly. Constantly update communities on delays and latest schedules. 	RE and Contractor.
	Poaching and trapping	No poaching or trapping will be allowed and is a criminal offence.	RE , EC and Contractor to monitor	Contractor.
Dangerous work area	Existence of dangerous/hazardous work areas	The work areas must be set out and isolated and demarcated by means of danger tape on a daily basis. The demarcated work area	Inspections for approval.	RE and Contractor.

ENVIRONMENTAL MANAGEMENT IMPACTS REQUIRING MITIGATION	SOURCES OF IMPACTS	MITIGATION MEASURES	MONITORING ACTIONS AND METHODS	RESPONSIBILITY FOR IMPLEMENTATION
SOCIAL ENVIRONMENT				
Threats to the health and safety of construction workers.	 Insufficient provision of safety equipment Negligent behaviour 	 may only contain materials, equipment, and personnel required to execute the work. Once the work for the day is completed, the demarcated area must be cleaned of any spilled materials and waste products. This must be disposed of in the allocated containers. If the work area is dangerous or sensitive, the danger tape should stay in place until work is complete or not sensitive anymore. The contractor must adhere to the regulations pertaining to health and safety, including the provision of protective clothing, failing which the contract may be suspended with immediate effect. Failure to remedy such lack of provision may result in the 	Record excavation/backf ill schedule in the site instruction records. Regular visual inspection and records kept of safety equipment and materials issued.	RE and Contractor.
		 Failure to Terriedy Such Tack of provision may result in the immediate cancellation of the contract according to the clauses stipulated in the Specific and General Conditions of Contract. The contractor should comply with all relevant labour laws as stipulated by the Labour Act. First aid kits to be readily available in case of injuries Dust protection masks shall be provided to staff members if they 	Regular inspections	RE, EC and
		complain about dust.	and attendance to work complains.	Contractor.
		Workers in the vicinity of sources of high noise should wear necessary protection gear.	Regular Inspection	RE, EC and Contractor.

ENVIRONMENTAL MANAGEMENT IMPACTS REQUIRING MITIGATION	SOURCES OF IMPACTS	MITIGATION MEASURES	MONITORING ACTIONS AND METHODS	RESPONSIBILITY FOR IMPLEMENTATION
SOCIAL ENVIRONMENT				
		NO person is allowed to smoke close to fuel storage facilities and in portable toilets at the construction site since the chemicals used in chemical toilets are highly flammable.	Regular Inspection.	RE, EC and Contractor.
		Workers should not be allowed to make use of the existing neighbourhood facilities. Potable water must be provided to workers to avoid dehydration.	Regular Inspection.	RE, EC and Contractor.
		Portable toilets should be available at the construction site in the following ratio: 2 toilets for every 50 females and one toilet for every 50 males.	Regular Inspection.	RE, EC and Contractor.
	Low productivity and increase health risk of workforce due to high temperatures.	 Provide hats, ample drinking water Provide regular breaks. 	Daily checking of weather forecast.	RE, EC and Contractor.
	Fire incident.	 Foam fire extinguishers must be in close proximity to fuel kept on site There should be trained personnel to handle this equipment At least two extinguishers should be placed in the workshop. 	Foam fire extinguisher should be available when work commences.	RE, EC and Contractor.
Health and social pathology.	 Increase prostitution and associated social pathologies and health risks 	Prohibit unauthorized people on site and secure construction area, while monitoring entrance and exits. Contract penalties. Workers are not allowed to reside on the construction site.	Daily monitoring by contractor.	Contractor

ed	Record visitors in a	
	Record visitors in a	
	site-visit book	
sks Specify health and safety risk avoidance measures. to of	Daily monitoring by contractor	Contractor
At no stage may a construction worker be allowed on site under the influence of alcohol.	Daily monitoring by contractor.Spot checks.	RE and Contractor
Under no circumstance are workers allowed to intrude on	Regular monitoring by RE.	RE and Contractor
ıg	Under no circumstance are workers allowed to intrude on neighbouring properties.	Under no circumstance are workers allowed to intrude on Regular monitoring

ENVIRONMENTAL MANAGEMENT IMPACTS REQUIRING MITIGATION	SOURCES OF IMPACTS	MITIGATION MEASURES	MONITORING ACTIONS AND METHODS	RESPONSIBILITY FOR IMPLEMENTATION
SOCIAL ENVIRONMENT				
Disorderly and unwanted settlement in the road reserve	Informal market stalls providing services to construction workers	 In consultation with the regional council and traditional authorities, to determine the conditions for of market stalls next to the road and at lay-byes. No settlement will be allowed. 	Set conditions for market stalls Regular inspection of site	Contractor
Construction site	Visual nuisance of the construction activities.	 The boundaries of the construction area shall be demarcated prior to any work commencing on the site The construction area should be clearly marked. 	RE and Contractor should agree on demarcation lines.	RE, EC and Contractor.
	Improper conduct on construction site.	 The construction area should adhere to the following requirements: Access should be controlled and only workers allowed within the boundaries of the campsite: Records should be kept and all visitors should sign in and sign out of a visitors logbook The contractor should in no way permit or allow prostitution to take place at the construction area. 	Regular visual and record inspection by the RE.	RE, EC and Contractor.
Negative impact on the social and ecological environment.	Establishment of campsite.	 One campsite should be established for all construction activity (i.e. for all three sites). The contractor must negotiate the use of existing facilities before considering entering new terrain. 	Contractor and Re should agree on a satisfactory area.	Contractor with approval of the Client, EC and RE

ENVIRONMENTAL MANAGEMENT IMPACTS REQUIRING MITIGATION SOCIAL ENVIRONMENT	SOURCES OF IMPACTS	MITIGATION MEASURES	MONITORING ACTIONS AND METHODS	RESPONSIBILITY FOR IMPLEMENTATION
SOCIAL ENVIRONMENT				
		 The contractor must receive approval to use a facility or land in writing. This approval must state the remuneration and conditions of use. Devise a layout for the site so that internal circulation of workers and vehicles in relation to the various construction functions is optimised. 		
	Conduct on campsite.	 No one is allowed to reside on the campsite, save for construction personnel. The campsite may act as a facility for the storage of construction material, temporary stockpile sites, and fuel installations etc, required by the Contractor or subcontractors and suppliers. Materials must be stored in a separate closed-off premise that is sufficiently prepared to protect the environment for pollution, such as impermeable floors, closed containers and a security fence. 	Daily monitoring by contractor.	Contractor.
	Stockpiling materials on site.	 Stockpile materials such as bricks, sand, and stones in neat piles store sensitive materials such cement, hazardous materials, and consumables separately in a demarcated area on site. Store only small amounts of materials on site to avoid unsupervised use that may lead to accidents and spills. 	 Daily monitoring by contractor. Regular visual and records inspection by the RE. 	RE and Contractor.

ENVIRONMENTAL MANAGEMENT IMPACTS REQUIRING MITIGATION SOCIAL ENVIRONMENT	SOURCES OF IMPACTS	MITIGATION MEASURES	MONITORING ACTIONS AND METHODS	RESPONSIBILITY FOR IMPLEMENTATION
SOCIAL EITOMORNIEIT				
		 Stockpiles must be of a safe height of less than 2m high and 45° slope angle. Cement stacks must not be higher than 1.5m. Protect all fluids containers from low temperatures to avoid leaks and pollution. 	Regular visual and records inspection by the RE.	RE and Contractor.
BIOPHYSICAL ENVIRONM	ENT			
Drainage issues.	Surface run-off.	Surface protection work is recommended on the river bed.	Daily inspection of the surface protection work.	EC, Contractor.
Soil pollution	Garbage, cement, concrete, sewage, chemicals, fuels, oils or any other objectionable or undesirable material.	 Hazardous waste should be disposed of in the prescribed manner in order to prevent contamination of soils (see waste management heading). In case of accidental spills, the contaminated soil must be suitably disposed of in a container for hazardous waste. 	Daily monitoring and regular visual inspection by contractor.	EC, Contractor
	Soil pollution by fuel leaks	If fuel is stored at the construction camp, fuel tanks must be properly bunded. The volume of the bunded area must be sufficient to hold 1.5 times the capacity of the storage tanks. The floor of the bunded area must be impermeable and the sides high enough to achieve the 1.5 times holding capacity.	Daily monitoring by Contractor and regular visual inspection by RE	EC, Contractor
		Drip trays should be available for all equipment that is intended to be used during construction. These trays should be placed underneath	Daily monitoring and regular visual	EC, Contractor

ENVIRONMENTAL MANAGEMENT IMPACTS REQUIRING MITIGATION	SOURCES OF IMPACTS	MITIGATION MEASURES	MONITORING ACTIONS AND METHODS	RESPONSIBILITY FOR IMPLEMENTATION
SOCIAL ENVIRONMENT				
		each vehicle while the vehicles are parked. The drip trays should be cleaned every morning and the spillage handled as hazardous waste.	inspection by contractor.	
	Soil pollution by cement mixed on the ground.	Under no circumstances should cement be mixed on open soil. A designated metal container should be made available for this purpose.	Daily monitoring by Contractor and regular visual inspection by RE	EC, Contractor
	Cleaning of equipment.	All cleaning of equipment should take place within the construction site and the water from washing operation should be collected in a tank and disposed of in agreed manner.	Daily monitoring by Contractor.	EC, Contractor
	Heavy vehicles/ movement of vehicles across site.	The movement of vehicles to and across the site should be controlled. Construction material required should be moved to where it is needed by means of wheelbarrows (when possible) instead of trucks thereby minimizing the impact on the soil.	Daily visual inspection and monitoring by Contractor.	EC, Contractor
BORROWPIT SITES	Sand mining/ road material mining	 The contractor in consultation with the environmental consultant and/or RE shall visit all potential excavation sites prior to excavation. The engineers and surveyors must then draft a plan for approval before commencement of excavations. This plan must indicate the required resources and sensitive areas that may not be mined (indication of the mature trees). No removal of trees with a stem diameter of 200mm or more. Protect clusters of trees and individual trees with a space buffer of at least 5m. The top 150mm of topsoil must be stored separately for use to rehabilitate the borrow pit. 	Contractor and environmental consultant to visit all potential excavation sites.	EC, Contractor

ENVIRONMENTAL MANAGEMENT IMPACTS REQUIRING MITIGATION	SOURCES OF IMPACTS	MITIGATION MEASURES	MONITORING ACTIONS AND METHODS	RESPONSIBILITY FOR IMPLEMENTATION
SOCIAL ENVIRONMENT				
		 The removal of material at excavation sites shall be focused where the least significant vegetation exists. The contractor shall liaise with the applicable local residents regarding the location of excavation sites. No borrow pit may be excavated from any sensitive or open space areas. 		
WATER CONSERVATION				
Irresponsible use of water.	Water wastage due to careless practices during construction.	 Establish a water plan which, should include at least the following: A description of: The source of the water Where and how the water will be stored How the water will be distributed/utilised Describe measures that will be taken to conserve water at each of the above mentioned phases Educate the work force on sustainable and effective use of water, e.g. clean equipment in containers. No member of the construction team is allowed to wash clothes OR vehicles on the construction site. 	Daily inspections and condition reports.	RE, EC and contractor.

ENVIRONMENTAL MANAGEMENT IMPACTS REQUIRING MITIGATION	SOURCES OF IMPACTS	MITIGATION MEASURES	MONITORING ACTIONS AND METHODS	RESPONSIBILITY FOR IMPLEMENTATION
SOCIAL ENVIRONMENT				
	Leaks from tanks and taps.	Water should be used sparingly throughout the construction of the development. It is the responsibility of the site coordinator to ensure that water conservation is strictly enforced.	Daily inspections and condition reports.	RE, EC and contractor.
		Water tanks / taps must be fixed. The water tank or taps must have water meters and be accessible to visual inspection. All faulty and leaking taps and pipes shall be immediately repaired.	Daily inspections and condition reports.	RE, EC and contractor.
Groundwater contamination.	Refuse, garbage, cement, concrete, chemicals, fuels, oils or any other objectionable or undesirable material.	 Accidental spills must be cleaned immediately to avoid the pollution of the wetland, and ground water, since the soil around the site is highly permeable. No member of the construction team is allowed to wash clothes OR vehicles on the construction site. 	Inspection daily, reporting, and regular clean up.	RE, EC and contractor.
CONSERVATION OF VEGET	TATION			
Loss of biodiversity	Clearing of vegetation (removal of trees etc).	 The area to be constructed on the site, as well as lay-down areas, access routes, etc should be clearly demarcated. The workforce must be instructed to operate within these boundaries. Any activity resulting in the chopping down of trees or removal of vegetation without the required authorisation is strictly prohibited. All protected tree species will be tagged so that they are visible during construction works. 	Regular review of photographic records. Take photographs before construction starts as a record. Monitoring by the EC	RE, EC and contractor.
	Planting of alien vegetation.	No alien vegetation may be introduced to the site in the form of seeds or plants, for beautification or any other reason.	Regular inspection of site vegetation by the EC.	RE, EC and contractor.

ENVIRONMENTAL MANAGEMENT IMPACTS REQUIRING MITIGATION	SOURCES OF IMPACTS	MITIGATION MEASURES	MONITORING ACTIONS AND METHODS	RESPONSIBILITY FOR IMPLEMENTATION
SOCIAL ENVIRONMENT				
		At the end of construction all alien vegetation that has established should be eradicated.		
WASTE MANAGEMENT:				
Construction waste.	Incorrect or infrequent disposal of building rubble.	Construction waste should be stored in skips and should regularly be removed off the site for disposal at an applicable municipal waste disposal site.	Regular inspection on site.	RE, EC and contractor.
	Construction waste blown by wind (e.g. cement bags).	Empty cement bags, plastics, wrapping waste, strapping, etc. to be secured in containers for general waste to prevent wind-blown waste.	Daily inspection and clean up.	RE, EC and contractor.
Increased general waste.	Domestic waste from construction team.	 Waste shall be separated according to cardboard/paper materials, plastic, bottles and tins. The various waste types shall be disposed of at appropriate municipal and recycling facilities. Appropriate containers shall be placed on site for waste separation and the workforce trained sensitised accordingly. Only the general waste, which cannot be recycled shall be disposed of at the municipal waste disposal facility. 	Daily inspection and clean up.	RE, EC and contractor.
Domestic waste.	Domestic waste from construction team.	 The workforce must be sensitised to dispose of waste in a responsible manner and not to litter, not at the construction site and not at the campsite. Sufficient waste bins should be supplied. 	Daily inspection and clean up.	RE, EC and contractor.

ENVIRONMENTAL MANAGEMENT IMPACTS REQUIRING MITIGATION	SOURCES OF IMPACTS	MITIGATION MEASURES	MONITORING ACTIONS AND METHODS	RESPONSIBILITY FOR IMPLEMENTATION
SOCIAL ENVIRONMENT				
		Domestic waste which cannot be recycled should be stored in a skip and removed via truck once a week.	Regular inspection.	RE, EC and contractor.
Hazardous waste.	Accidental / negligent spillages from equipment working on site.	 Spillages of any potentially toxic materials, whether by accident or through negligence, must be scooped up immediately into drums. Contact Wesco Group to salvage the spilled materials (see Appendix A for the contact details). 	Daily inspection and clean up.	RE, EC and contractor.
	Storage of hazardous materials.	Bitumen products waste, oil sludge, oily rags, contaminated spill clean-up materials, contaminated soils and other hazardous materials waste must be kept off-site or in a dedicated separate container on site. These containers must be locked and only accessible by the site foreman. Wesco Group should be approached to collect these wastes periodically or as needed.	Daily inspection and clean up.	RE, EC and contractor.
Ablution waste.	Construction team.	Only portable chemical toilets will be used on site and at the campsite. Under no circumstances may the waste from these toilets be dumped in the veld. The waste should be removed at least once a week to the nearest municipal sewage site. Alternatively, it may be pumped out into sealable containers and stored until it can be removed by truck. If stored, the containers should be kept out of direct sunlight and should not be stored for longer than a month. People responsible for cleaning these toilets should be provided with latex gloves and masks.	Daily inspections and clean-up.	RE, EC and contractor.
DUST CONTROL:		Spillage or leakage to be cleaned-up and fixed immediately.		

ENVIRONMENTAL MANAGEMENT IMPACTS REQUIRING MITIGATION	SOURCES OF IMPACTS	MITIGATION MEASURES	MONITORING ACTIONS AND METHODS	RESPONSIBILITY FOR IMPLEMENTATION
SOCIAL ENVIRONMENT				
Dust generation.	Dust proliferation due to	Soil stacks should be placed downwind from the main activity	Visual monitoring for	RE, EC and
	fines content of soil.	areas and from the road detour.	dust nuisance and	contractor.
NOISE CONTROL:		All construction areas and soil stacks should be regularly wetted.	safety	
NOISE CONTROL.				
Noise generation.	Noise from vehicles and	All machinery should be calibrated and maintained regularly.	Daily monitoring.	RE, EC and
	construction activities.	Construction activities should be discontinued during night-time hours (18h00 to 07h00) and over week-ends.	 Complaints from neighbours. Records of how these have been addressed. 	contractor.

4.3. Post-Construction Phase

ENVIRONMENTAL	SOURCES OF IMPACTS	MITIGATION MEASURES	MONITORING ACTIONS	RESPONSIBILITY
MANAGEMENT IMPACTS			AND METHODS	FOR
REQUIRING MITIGATION				IMPLEMENTATION
Hazardous unattended	Temporary structures,	Clear and clean the construction site to the satisfaction of the RE.	Inspection of the site	RE, EC
construction site	equipment, materials, waste		by the RE	
	and facilities used for			
	construction activities.			
Unsightly borrow	 Unstable slopes of 	Shape all sides of the borrow pit to 30° to horizontal. Rip the terrain	Inspection by RE , EC	Contractor, EC
areas	unrehabilitated borrow	and access routes and replace the stored topsoil evenly over the	after rehabilitation.	and Engineer.
	pit.	terrain.		

ENVIRONMENTAL	SOURCES OF IMPACTS	MITIGATION MEASURES	MONITORING ACTIONS	RESPONSIBILITY
MANAGEMENT IMPACTS			AND METHODS	FOR
REQUIRING MITIGATION				IMPLEMENTATION
	Loose sediment washed away from unstable slopes.			

5. CHAPTER FIVE: CONCLUSION AND RECOMMENDATIONS

5.1. Conclusion

Arising from the analysis by the consultants, the proposed project has land cover/use impacts on the proposed project site. Because land must develop, but with land development, there should not be environmental degradation, thus the EMP provides for the sustainable land development of the energy generating facility.

5.2. Recommendations

In order to alleviate any negative impacts that may emanate from the roap upgrade project, the contractor and RA should follow recommendations as follows:

5.2.1. Environment Management Plan Recommendations

In order to ensure a healthy and safe environment in the proposed site and its environs, a plan for environmental management has to be instituted through monitoring. This involves the collection and analysis of relevant environmental data as well as periodic documentation and reporting.

5.3. External Auditing

The key to a successful ESMP is appropriate monitoring and review to ensure effective functioning of the ESMP and to identify and implement corrective measures in a timely manner. In the event that discrepancies are identified, the problem must be investigated and attended to. All the results obtained during environmental monitoring must be documented for audit purposes.

An audit of the environmental management actions undertaken is essential to ensure that it is effective in operation, is meeting specified goals, and performs in accordance with relevant regulations and standards. Audits should be conducted during the operational phase of the facility to ensure adherence to the management measures contained in the EMP.

5.4. Recommendation to MEFT

Having looked at the potential impacts of the proposed project development, the risks associated with the development and the mitigation measures contained in this EMP, EnviroPlan Consulting concepts recommends that the Ministry of Environment, Forestry and Tourism: Department of Environmental Affairs (MEFT:DEA) approve the proposed planning, design and upgrade of the DR3616 from gravel to bitumen standard and issue an Environmental Clearance Certificate (ECC) on condition that the proponent will ensure complete compliance to the developed Environmental and Social Management Plan (ESMP).

6. ENVIRONMENTAL MONITORING AND REPORTING

EC: ENVIRONMENTAL MONITORING REPORT

Report No: Date:	
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Method Statements	Contractor:	Date received:

Issue	Observation	Remedial action	Compliance			
1 Construction	1 Construction					
1.1 All plant, personnel, etc.						
restricted to works area?						
1.2 Contractor's Camp						
located in area of low						
environmental sensitivity as						
indicated by the Engineer?						
1.3 Where needed, sensitive						
areas adequately fenced off?						
1.4 Fencing well maintained?						
1.5 No unauthorised entry,						
stockpiling, etc. outside work						
areas?						
1.6 All vehicles and plant						
remain on designated						
routes?						
1.7 Information posters put						
up and maintained where						
needed?						
1.8 No smoking in hazardous						
areas?						
1.9 Basic fire						
fighting equipment						
available on Site?						

Issue	Observation	Remedial action	Compliance
1.10 No burning of wastes as a means of disposal?			
1.11 Staff aware of procedures in the event of spills/leaks?			
1.12 Materials for dealing with spills/leaks available?			
1.13 Emergency contact numbers displayed at Contractor's office?			
1.14 Complaints Register up to date?			
1.15 Archaeological material found on Site mitigated?			
1.16 No animals trapped or harmed?			
1.17 No flora removed or damaged outside work areas?			
1.18 Adequate drainage and retaining works in place to control erosion/siltation?			
1.19 Restricted traffic over stabilised areas?			

Issue	Observation	Remedial action	Compliance
1.20 No concrete mixing on bare ground?			
1.21 Concrete batching restricted to area of low environmental sensitivity?			
1.22 All wastewater from concrete mixing area disposed of via wastewater management system?			
1.23 Concrete mixing area kept neat and clean?			
1.24 Suitable screening and containment of cement silos?			
1.25 All visible remains of excess concrete removed on completion of concrete work?			
1.26 No pollution from drilling operations?			
1.27 Location and rescue of plants undertaken by suitably qualified contractor?			
1.28 Rescued plants moved to nursery if direct transplantation not possible?			

Issue	Observation	Remedial action	Compliance	
1.29 After vegetation				
clearance, all unstable areas				
are properly stabilised?				
1.30 Cleared				
vegetation properly				
disposed of?				
1.31 All wastes removed				
from cleared area and				
disposed of?				
1.32 Mulched				
vegetation stored in				
bags?				
1.33 Fertilisers				
containing				
phosphates not used?				
1.34 No planting undertaken				
where construction works				
have not yet been finished?				
1.35 No unauthorised traffic				
on revegetated areas?				
2 Materials				
2.1 Construction materials				
adequately secured to				
ensure safe deliveries?				

Issue	Observation	Remedial action	Compliance	
2.2 All materials being stored inside Contractor's Camp?				
2.3 All imported materials free of weeds, litter, etc.?				
2.4 Stockpile areas approved?				
2.5 Topsoil stripped and stockpiled at a suitable site prior to earthworks?				
2.6 No spoil stockpiled outside agreed areas?				
2.7 Spoil stockpiles correctly shaped and protected?				
2.8 All plants used for landscaping/rehabilitation are local and indigenous?				
2.9 Plants adequately protected during transit and at storage facilities?				
2.10 Plants healthy and free from diseases and pests?				
3 Plant				

Issue	Observation	Remedial action	Compliance
3.1 Fuel/oil storage facilities			
adequately secured and			
protected against leakage?			
3.2 Safety signage provided			
at fuel storage areas?			
3.3 All electrical/petrol			
pumps suitably equipped			
and placed not cause any			
danger of ignition?			
3.4 Fuel storage areas			
comply with fire safety			
regulations?			
3.5 Necessary authorisations			
obtained for temporary			
above ground fuel tanks?			
3.6 Capacity of a fuel tank does not exceed 9000 €?			
3.7 Fuel tanks erected at			
least 3.5 m away from buildings, boundaries or			
other flammable materials?			
3.8 Adequate toilet facilities			
provided for staff (min. 1			
toilet per 30 workers)?			
tonet per do morneroj.			

Issue	Observation	Remedial action	Compliance
3.9 Toilets adequately maintained?			
3.10 All workers use toilets?			
3.11 Scavenger-proof bins with lids provided at eating areas?			
3.12 Waste temporarily stored inside Contractor's Camp in weather- and scavenger-proof bins?			
3.13 No burying or dumping of wastes on site?			
3.14 Waste management system in place?			
3.15 Refuse disposed of at licensed landfill?			
3.16 Adequate waste-water management system in place?			
3.17 Approval for discharge of contaminated water into municipal sewer system?			

Issue	Observation	Remedial action	Compliance
3.18 Runoff from workshops,			
fuel depots, etc. directed into			
conservancy tanks for			
disposal at approved site?			
3.19 Wash areas placed and			
built in such a way that does			
not cause any pollution?			
3.20 All maintenance of plant			
and equipment takes place			
in workshop?			
3.21 All plant is			
well maintained (no			
leaking)?			
3.22 Workshop has a			
bunded, impermeable floor			
sloping towards oil trap?			
3.23 Contractor's Camp tidy?			
3.24 All plant and machinery			
have drip trays, which are			
checked and emptied daily?			
3.25 All repairs on machinery			
using fuels or lubricants			
done over a drip tray?			
3.26 Static plant			
located within a			

Issue	Observation	Remedial action	Compliance
bunded area?			
3.27 Measures in place to			
minimise dust generation?			
3.28 No handling/transport			
of erodible materials under			
high wind conditions?			