

APP 003921

Environmental Scoping Report for Brick Manufacturing Project for Omundaungilo Community Forest, in Omundaungilo Constituency Ohangwena Region



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PROPONENT

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ACRONYMS

CBNRM	Community Based Natural Resource Management	
CCFN	Community Conservation Fund of Namibia	
DEA	Department of Environmental Affairs	
EA	Environmental Assessment	
EAP	Environmental Assessment Practitioner	
ECC	Environmental Clearance Certificate	
EIA	Environmental Impact Assessment	
EMA	Environmental Management Act (No. 7 of 2007)	
EMP	Environmental Management Plan	
ES	Environmental Scoping	
ESS	Environmental and Social Safeguard	
FPIC	Free Prior Informed Consent	
I&APs	Interested and Affected Parties	
KfW	German Government Development Bank	
MEFT	Ministry of Environment Forestry and Tourism	
NAFOLA	Namibia's Forested Lands project	
PPE	Personal Protective Equipment	
RD	Red-Dune Consulting CC	
SEMP	Social Environmental Management Plan	
TORs	Terms of Reference	

EXECUTIVE SUMMARY

(a) Introduction and Background

Traditionally, people in the northern regions of Namibia use timber to building their houses. Practiced over centuries, it has caused severe deforestation in many parts of the north. In effort to combat deforestation, the Namibian Government established the concept of Community Forest. The concept aims to integrate plant resources with the conservation mandate of the Ministry of Environment Forestry and Tourism and has become an important part of the Community Based Natural Resource Management (CBNRM) concept.

The CBNRM concept is based on the understanding that if natural resources have sufficient value to rural communities, and allow for rights to use, benefit, and manage, then appropriate incentives for people to use natural resources in a sustainable way will be created through the establishment of a Community Forest.

To provide incentives and alternatives material for construction of houses, management of Omundaungilo Community Forest, supported by the Namibia's Forested Lands project (NAFOLA) initiated a community brick making project in 2014 under the theme "*Brick to Conserve*".

Through a grant application, Omundaungilo Community Forest requested the Community Conservation Fund of Namibia (CCFN) to be supported with establishment of a community brick making project.

(b) Statutory requirement

Section 27(2) of the Environmental Management Act (Act No 7 of 2007) has listed activities that cannot be undertaken without an Environmental Clearance Certificate (ECC). Brick manufacturing is NOT a listed activity. However, the primary inputs of production is sand which requires an ECC.

Consequently, Red-Dune Consulting was appointed to undertake an Environmental Scoping (ES) and develop an Environmental Management Plan (EMP) for the project.

(c) Environmental Social Impact Assessment

The project site has been cleared of small bushes. The sand mining site is located over 300m away from the gravel road. The site borders two homestead which are far away hence they will not be affected by the project activities such as noise and dust. Like the major part of the Omundaungilo, the site has deep sand, when it rains it does not cause run offs which could cause soil erosion and land degradation. Overall, there project will not have an impact on biodiversity and land use.

The project will however be beneficial to the community through employment creation and income generation. Furthermore, the project will encourage community to build their houses using bricks, thus preventing cutting down trees.

1 INTRODUCTION

Traditionally, people in the northern regions of Namibia use timber to building their houses. Practiced over centuries, it has caused severe deforestation in many parts of the north. In effort to combat deforestation, the Namibian Government established the concept of Community Forest. A Community Forest (CF) is an area in the communal lands of Namibia for which local communities have obtained the rights to manage forests, woodlands, and other types of natural vegetation¹.

CF is one of the programmes of the Directorate of Forestry in Ministry of Environment Forest and Tourism, in which the directorate aims to integrate plant resources with the conservation mandate of the Ministry. Consequently, the CF become important part of the Community Based Natural Resource Management (CBNRM) programme.

The CBNRM programme is based on the understanding that if natural resources have sufficient value to rural communities, and allow for rights to use, benefit, and manage, then appropriate incentives for people to use natural resources in a sustainable way will be created through the establishment of a CF. The CBNRM programme links conservation to poverty eradication through developing the conservation, hunting, and tourism industries which in turn contribute to the Gross Domestic Product, employment creation and the improvement of the well-being and social upliftment of rural communities.

To provide incentives and alternatives material for construction of houses, management of Omundaungilo Community Forest supported by the Namibia's Forested Lands project (NAFOLA) initiated a community brick making project under the theme "*Brick to Conserve*". The project is in line with the CBNRM concept of employment creation and improvement of the well-being and social upliftment of rural communities.

¹ Forest Act, 2001(Act, No. 12 of 2001)

1.1 Support by Community Conservation Fund Namibia

Through a grant application, Omundaungilo Community Forest requested the Community Conservation Fund of Namibia (CCFN) to be supported with establishment of their existing community brick manufacturing project through a *"Brick to Conserve"* initiative. The community seek to be supported with brick making equipment and personnel capacity development.

With financial support from the German Government through the KfW Development Bank, CCFN is implementing a project, "*Poverty Oriented Support to Community Conservation in Namibia*". The project's main objective is to contribute to biodiversity conservation and rural development in Namibia's communal conservancies and community forest in line with CBNRM programme. Through the project, CCFN intends to support Omundaungilo Community Forest to establish their community brick manufacturing project.

1.2 Statutory Requirement

Section 27(2) of the Environmental Management Act (Act No 7 of 2007) read together with Annexure of the Environmental Impact Assessment (EIA) Regulation, has listed activities that cannot be undertaken without an Environmental Clearance Certificate (ECC). The proposed brick manufacturing project is NOT a listed activity. However, the primary inputs of production is sand which requires an ECC.

1.3 Terms of Reference

The Terms of Reference (TORs) for this Environmental Impact Assessment (EIA) is in accordance with framework of EMA and its (EIA) Regulation 9(a-d). It also considers other relevant local, national, and international laws. These guidelines are aimed to focus on issues of greater environmental concerns and to develop mitigation measures for effective environmental management. Eventually, this Scoping Report (SR) is aimed at obtaining the ECC for the project and to ensure environmental sustainability. The TORs of this project include;

- a description of all tasks to be undertaken as part of the assessment process, including any specialist to be included if needed;
- an indication of the stages at which the Environmental Commissioner is to be consulted;
- a description of the proposed method of assessing the environmental issues and alternatives; and
- the nature and extent of the public consultation processes to be conducted during the assessment process.
- identify relevant legislation and guidelines for the project;
- identify potential environmental (physical, biological, and social) conditions of the project location and conduct risk assessment;
- Inform Interested and Affected Parties (I&APs) and relevant authorities about the proposed project to enable their participation and contribution;
- Develop an Environmental Management (EMP) that would be a legal guideline for the environmental protection by the project

1.4 Scope

The scope of this project is guided by the EIA Regulations 2012, which follows the process as shown in **Figure 1**. The scope aims at identifying possible impacts, assessing the impact and formulate the optimum, practical mitigation measure to minimize the impacts.

Red-Dune (RD) believes that the Social Environmental Management Plan (SEMP) provides practical mitigation measure which shall ensure environmental sustainability. Further, RD believes

that, the information provided is adequate and sufficient to enable the Environmental Commissioner (EC) to make an informed decision for the project.

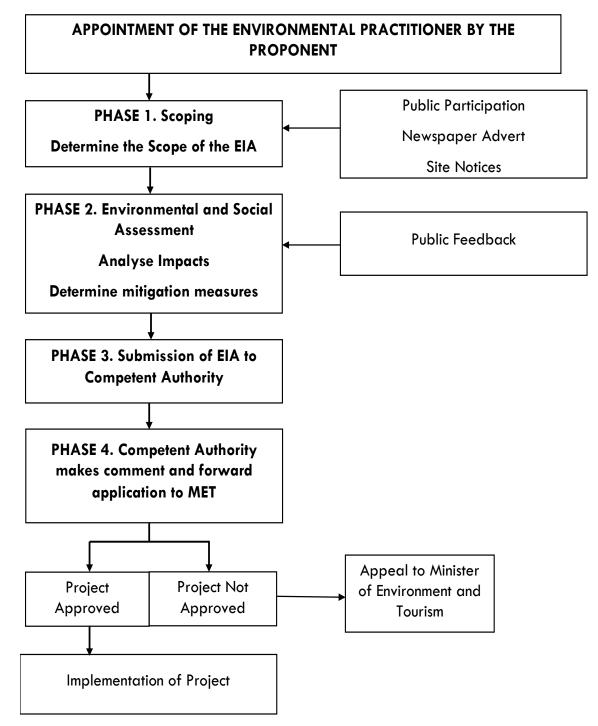


Figure 1 The EIA Process in Namibia

1.5 Permits and approvals

The proposed project obtained several supports from key stakeholders as follows;

- 1. Consent from the Oukwanyama Traditional Authority (Annex 2)
- 2. Consent from the Ohangwena Regional Council (Annex 3)
- 3. Support from the Ministry of Environment Forestry and Tourism (Annex 5)
- 4. Free Prior Informed Consent from community (Annex 7)

2 PROJECT DESCRIPTION

2.1 Proponent

Omundaungilo Community Forest is the Proponent for this application with financial support from CCFN.

2.2 Location

The brick manufacturing project will be established at Omundaungilo Community Forest, GPS coordinates -17.449859⁰ S, 16.698448⁰ E on a two (2) hectares (Ha) piece of land in Omundaungilo Constituency of Ohangwena Region at about 2.7 kilometres from Omundaungilo Settlement (**Figure 2**). The land parcel is allocated to the Omundaungilo Community Forest by the Traditional Authority.



Figure 2. Project Locality

The site is alongside a gravel road that connect Omundaungilo settlement to B10 road in the south. It is partially cleared of vegetation, with majority of mature trees remaining. There is a power transmission lines on the east along the road but not within the project area (**Figure** *3*).



Figure 3. Project site pictures, (Source: Red-Dune Consulting 17 April 2024)

2.3 Brick making

Bricks will be made using manual brick making machine, sun dried and manually piled on site. Wheelbarrows will used to transport sand and bricks on site (**Figure 4**). Cement will be manually mixed in the open until a point where a concrete mixer is procured.



Figure 4. Equipment to be used (*Photo for illustration purpose only*)

2.4 Sand Mining

Omundaungilo is made up of deep sand. Sand will be collected at the brick making site using manual tools such as spades and pickaxe and transported with wheel barrows (**Figure 5**).



Figure 5. Cleared area for sand mining

The site, like the broader area of north eastern part of Ohangwena region, is formed up of think sand, hence its strategic location next to the road to ensure accessibility with vehicles (**Figure** *6*).



Figure 6. Example of a village road accessible only by four-wheel drive vehicle

2.5 Water Source

Water will be collected from an earth dam and brought to site with a pick-up car. In future, the project targets to rehabilitate a broken government borehole that used to supply water to the settlement (**Figure** 7).



Figure 7. Broken borehole at Omundaungilo Settlement

2.6 Area Fencing

The project area will be fenced with a mesh wire to prevent unauthorised access as well as access by animals.

3 DESCRIPTION OF THE AFFECTED ENVIRONMENT

3.1 Physical Environment

3.1.1 Geology

Namibian's northern part, commonly known as the "*Owambo Basin*" is formed by sand deposit from water borne deposit millions of years ago. These deposit of sand and water borne deposits formed the Kalahari Basin. The deposits of sands, clay and calcrete makes up the Kalahari Group.

3.1.2 Topography and Drainage

Ohangwena region is situated on a flat topography extending east to west along the Angolan border. Although the overall regional area is influenced by the Cuvelai Basin², the drainage do not affect the project site since it is not located in *Iishanas* and is made up of a relatively thick forest with deep sand.

3.2 Land use

The northern part of Namibia falls under communal land use where land use is mainly for communal farming with domestic animals such as goats, cattle, donkeys, and pigs and cultivating crops. The project site could be frequented either through passages of seldom grazing domestic animals.

3.3 **Biodiversity**

Pictures of the dominant trees are presented in the **Table 1** below with their conservation status. The dominant tree species found in the project area are *Pterocarpus angolensis* (Kiaat) and

² a drainage made up of networks of shallow watercourses locally known as "*Iishanas*" (*Iishanas* are recharged by floodwater from Angola during times of high rainfall or filled by rain that occur in the region).

Combretum species. The field assessment was undertaken during the dry phase of the year and no grass species could be identified.

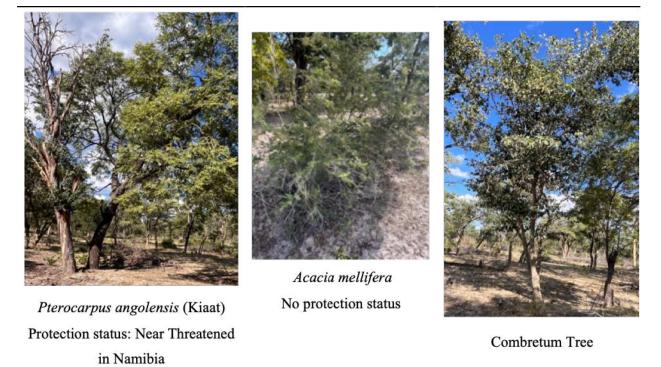


Table 1. Dominant tree species found in the project area

4 PROJECT ALTERNATIVE

The EMA requires an EIA to explore various project alternatives which aims to ensure that a chosen project component does not have significant impact to the environment. Section 1 of EIA regulation defines "alternatives" as different means of meeting the general purpose and requirements of the activity, which may include alternatives to -

- (a) the property on which or location where it is proposed to undertake the activity;
- (b) the type of activity to be undertaken;
- (c) the design or layout of the activity;
- (d) the technology to be used in the activity; and
- (e) the operational aspects of the activity;

Project alternatives ranges from not implementing the project (no go alternative), when the environmental impacts are severe, or there is high degree of uncertainty. Other alternative considers the project site, technology, and equipment to be used. The description of alternatives is as follows;

4.1 Site Alternative

The project site has strategically located alongside the road to enable access due to thick sand in Omundaungilo area. The project is not near any establishment hence there will be is no hindrance to the community. Overall, the project does not pose any social and environmental threat for an alternative site to be considered.

5 POLICY AND LEGAL FRAMEWORK

The following regulatory frameworks are key to the implementation of the project (*Table 2*).

Regulatory Framework	Summary	Applicability	
The Namibian Constitution	Article 95l ³	Protection of the environment and biodiversity	
Environmental Management	This act aims to promote the sustainable management of the	The acts provides a list of activities that may not be	
Act No. 7 of 2007	environment and the use of natural resources and to provides for a	undertake without an environmental clearance	
	process of assessment and control of activities which may have	certificate to prevent environmental damages.	
	significant effects on the environment; and to provide for incidental		
	matters		
Traditional Authorities Act	To provide for the establishment of traditional authorities and the The traditional authority has the power to allocate ar		
25 of 2000	designation, election, appointment, and recognition of traditional give consent to a land parcel		
	leaders; to define the powers, duties and functions of traditional		
	authorities and traditional leaders; and to provide for matters		
	incidental thereto.		
Communal Land Reform	To provide for the allocation of rights in respect of communal land;	The traditional authority has the power to allocate and	
Amendment Act 13 of 2013	to establish Communal Land Boards; to provide for the powers of	ers of give consent to a land parcel	
	Chiefs and Traditional Authorities and boards in relation to		
	communal land; and to make provision for incidental matters.		

Table 2. Policy and Regulatory Framework

³ The State shall actively promote and maintain the welfare of the people by adopting policies aimed at ... The maintenance of ecosystems, essential ecological processes and biological diversity of Namibia and utilization of living natural resources on a sustainable basis for the benefit of all Namibians, both present and future

Regulatory Framework	Summary	Applicability		
Draft Pollution Control and	This Bill serves to regulate and prevent the discharge of pollutants To protect the Environment from poss			
Waste Management Bill	to air and water as well as providing for general waste management hydrocarbons and oil leaks from the machinery			
Environmental Policy	This policy subjects all developments and project to environmental	Consideration of all possible impacts and incorporate		
framework (1995)	assessment and provides guideline for the Environmental	them in the development stages		
	Assessment.			
The Occupational Safety and	Promotes the Safety and Health of employees at the work place	Employees and public subjected to noise and dust		
Health Act No. 11 of 2007				
Public Health Act No. 36 of	To Protect the public from nuisance and states that no person shall	Application of proper mitigation measure to noise		
1919	cause a nuisance or shall suffer to exist on any land or premises	and dust		
	owned or occupied by him or of which he is in charge any nuisance			
	or other condition liable to be injurious or dangerous to health.			
Labour Act No. 11 of 2007	ct No. 11 of 2007 This Act outlines the labour laws which encompass protection and Fair labour practises to the project employees			
	safety of employees at work.			
Water Act No, 54 of 1956	All water resources belongs to the State. It prevents pollution and Prevention of water pollution			
	promotes the sustainable utilization of the resource			
Soil Conservation Act No. 76	To promotes the conservation of soil, prevention of soil erosion	n Sand harvesting had the potential to cause land		
of 1969	969 degradation			
Water Resource	The Act stipulates the prevention of both Surface and Ground water Prevention of water pollution			
Management Act No.11 of	f sources.			
2011				
Public Health Act no. 36 of	ublic Health Act no. 36 of The Act gives provision for the protection for the health of all The noise and dust level emanating from			
1919	people. could affect the surrounding community.			

Regulatory Framework Summary		Applicability
National Heritage Act No.27	ntional Heritage Act No.27 The Act gives provision of the protection and conservation of There were	
of 2004	places and objects with heritage significance.	within the close vicinity of the site.
Government Notices No.287		
of 2004		

6 STAKEHOLDER CONSULTATION

Section 21 of the EIA Regulation requires the undertaking of an Environmental Scoping (ES) to follows a robust stakeholder consultation. This is an important process, because it gives members of the public, Interested and Affected Parties (I&Aps) to comment or raise concerns that may affect their socio-economic or general environment because of the project. Further, it solicits crucial local knowledge that the Environmental Assessment Practitioner (EAP) may not have.

Stakeholder consultation focused on the community of Omundaungilo Community Forest, Oukwanyama Traditional Authority (Annex 5).

6.1 Omundaungilo Community Consultation

A meeting was held with members (Villagers) of Omundaungilo Community Forest on 18th April 2023 at Omundaungilo Settlement (**Figure** *8*).



Figure 8. Community Meeting at Omundaungilo Community Forest 18th April 2024 (*Source: Red-Dune Consulting 2024*).

- The meeting was attended by 34 people, 10 women and 24 (Annex 6).
- Mr. Ipeinge Mundjulu for Red-Dune Consulting presented the background of the project *"Brick to Conserve"* and the meeting objectives. He informed the meeting about the request that Omundaungilo Community Forest made to CCFN to be support with their proposed brick making project which has been approved by CCFN.
- The meeting was informed that, the project is funded by the German development bank, KfW which require that the money is spent wisely and accounted for to the benefit of the community and ensure that project implementing agencies observe the highest standard of Environmental and Social Safeguard (ESS) which aims to ensure that the project is environmental and social sustainability.
- The meeting was informed that, the ESS requirement does not support projects if amongst others, it involves:
 - Displacement of people
 - Destroying heritage sites
 - Damaging critical biodiversity habitat
 - Causing general conflict in the community
- Furthermore, the meeting was informed that, the proposed site must not be on an occupied land.
- The meeting was further informed that the protection of the environment is provided for under the Environmental Management Act 2007 (Act No. 7 of 2007) (EMA) and its Environmental Impact Assessment Regulation 2012. The EMA has listed developmental activities that may not be undertaken without an Environmental Clearance Certificate (ECC). Although 'Brick Making' is not entirely a listed activity, it involves 'sand mining' which is a listed activity. Hence an Environmental Scoping must be undertaken and an Environmental Management Plan needs to be developed for the project.
- To obtain an ECC, a Social and Environmental Impact Assessment must be undertaken, which is one of the core components of the consultation.
- Lastly the meeting was informed that, a consent letter is one of the requisites for the project to be implemented. This consent letter, called 'Free Prior Informed Consent' (FPIC) represent the community in understanding and agreeing to the proposed project. The FPIC was explained to the community as follows;

- **FREE** refers to a consent given voluntarily and absent of coercion, intimidation, or manipulation.
- **PRIOR** means consent is sought sufficiently in advance of any authorization or commencement of activities
- **INFORMED** means that community was well informed about the project and they know all information about the project.
- **CONSENT** refers to the collective decision made by the rights-holders and reached through the customary decision-making processes of the affected peoples or communities.
- Free Prior Informed Consent was verbally obtained from the meeting by show of hands and a FPIC letter was read to the community, read, and signed by the village headman (Figure 4, Annex 7).



Figure 9. Omundaungilo Forest Community consent

- The community enquired the following;
 - Welcomed the approval of their request by CCFN and urged all villages within the Omundaungilo Community Forest to work together.
 - A community member raised concern about lack of water at the project site.
 - Management Omundaungilo Community Forest informed the meeting that there are various earth dams in Omundaungilo which hold water throughout

the year. While sourcing alternative water sources such as rehabilitating existing none functioning boreholes in the area, the project will collect water from earths dams.

- A community member inquired if a permit would be required to collect water from earth dams.
 - Red Dune informed the meeting that, collecting of water from earth dams by community members does not require a permit or license, however, it should be done with consent from the area headman.
- The meeting enquired on what will happen if the project aims to expand to other villages within the Omundaungilo Community Forest, will it also require another ECC.
 - Red-Dune informed the meeting that the ECC is approved for a site-specific project hence another Environmental Scoping will be required to obtain an ECC for the specific site / area.
- The meeting adjourned with a prayer, and a site assessment with the community was undertaken (Figure 10).



Figure 10. Site Assessments with the community of Omundaungilo Community Forest

7 IMPACT IDENTIFICATION AND RISK ASSESSMENT

7.1 Impact Identification

The SR is structured to assess the impact of the proposed establishment and operation of the brick making project supported by sand mining. Potential impact were identified during sites assessment, stakeholder consultations and using literature review. This process conforms with the Environmental Impact Assessment Regulations of Environmental Management Act, 2007 (Government Gazette No. 4878) EIA regulations (**Table 3**. Criteria for impact assessment).

Impact significance was determined under two mitigation scenarios; without mitigation and with mitigation. The confidence of impact mitigation depends on the level of certainty based on available information to assess the impact.

Risk Event	Rating Description of the risk that may lead to an Impact		
Impact type	0	No Impact	
	+VE	Positive	
	-VE	Negative	
Probability	The probability the	nat an impact may occur under the following analysis	
	1	Improbable (Low likelihood)	
	2	Low probability	
	3	Probable (Likely to occur)	
	4	Highly Probable (Most likely)	
	5	Definite (Impact will occur irrespective of the applied mitigation	
		measure)	
Confidence	The confidence le	The confidence level of occurrence in the prediction, based on available knowledge	
level	L	Low	
	М	Medium	
	Н	High	
	0	None (Based on the available information, the potential impact is	
		found to not have a significant impact)	

Table 3. Criteria for impact assessment

Significance	L	Low (The presence of the impact's magnitude is expected to be	
(Without		temporal or localized, that may not require alteration to the	
Mitigation)		operation of the project	
·····g)	M	Medium (This is when the impact is expected to be of short term	
		moderate and normally regionally. In most cases, such impacts	
		require that the projects is altered to mitigate the impact or	
		alternative method of mitigation is implemented	
	H	High (The impact is definite, can be regional or national and in	
	11	long term. The impact could have a no-go implication unless the	
		project is re-designed or proper mitigation can practically be	
Т. Л. • . •	TT1 1 1	applied	
Mitigation		sure / alternative to reduce / avoid an impact	
Significance	0	None (Based on the available information, the potential impact is	
(With		found to not have a significant impact)	
Mitigation)	L	Low (The presence of the impact's magnitude is expected to be	
		temporal or localised, that may not require alteration to the	
		operation of the project	
	М	Medium (This is when the impact is expected to be of short term	
		moderate and normally regionally. In most cases, such impacts	
		require that the projects is altered to mitigate the impact or	
		alternative method of mitigation is implemented	
	Н	High (The impact is definite, can be regional or national and in	
		long term. The impact could have a no-go implication unless the	
		project is re-designed or proper mitigation can practically be	
		applied	
Duration	Time duration of the impacts		
	1	Immediate	
	2	Short-term (0-5 years)	
	3	Medium-term (5-15 years)	
	4	Long-term (more than 15 years	
	5	Permanent	
Scale	The geographical	scale of the impact	
	1	Site specific	
	1	1	

2	Local
3	Regional
4	National
5	International

The following negative and positive impacts were identified. An EIA is a living document, impacts that could not be identified during assessment and maybe identified later should be considered and adequate mitigation measures must be applied.

Potential Negative Impact	Potential Positive Impacts
Dust pollution	Direct creation of employment to the locals
Loss of biodiversity	Increased conservation of trees
Soil disturbance	Constructing of better / modern houses
Health and Safety risk	
Risk of contamination of ground water	
from oil, grease and lubricants from	
concrete mixers and vehicles	

7.2 Impact Assessment

The impact significance was determined using a risk matrix (**Table 4**). A five-by-five matrix was used where the impact severity was categorised and assigned scores from 1 to 5 as follows: Improbable=1, Low=2, Medium=3, High=4 and Severe=5. Similarly, the likelihood was assigned scores as follows; improbable=1, Low Likely=2, Probable=3, High Probability=4, Definite=5. The impact rating was determined by multiplying the impact severity and likelihood.

	5	5	10	15	20	25
	Definite	Low	Medium	High	Severe	Severe
000	4	4	8	12	16	20
	High Probability	Low	Medium	High	High	Severe
LIKELIH	3	3	6	9	12	15
	Probable	Low	Medium	Medium	High	High
LIK	2	2	4	6	8	10
	Low	Low	Low	Medium	Medium	Medium
	1	l	2	3	4	5
	Improbable	Negligible	Low	Low	Low	Low
		1 Negligible	2 Minor	3 Medium	4 High	5 Severe
]	IMPACT SEV	ERITY / CO	NSEQUENCE	1
		Negligible	Low	Medium	High	Severe

 Table 4. Risk assessment matrix⁴

7.3 Impact Mitigation and Significance

The mitigation measures were developed by applying the mitigation hierarchy; (i) avoid adverse impacts to the extent possible by using preventative measures; (ii) reduce adverse impacts to low levels; (iii) if unavoidable and cannot be reduced to practical low levels, remedy / offset⁵ for adverse residual impacts and explore applying the principle of precautional approach to prevent irreversible damage. The residual effect of the impact is assessed after applying mitigation measure to determine its significance.

⁴ Risk Management Guideline for the BC Public Sector (Province of British Columbia Risk Management Branch and Government Security Office 2012)

⁵ This step is the last resort to address significant residual impacts that could not be prevented through avoidance and minimization, or adequately corrected through restoration/rehabilitation.

8 IMPACT ASSESSMENT AND MITIGATION

8.1 Project Establishment

8.1.1 Positive Impact

8.1.1.1 Employment creation

Enhancement measures

- 1. All employment opportunity must be reserved for members of Omundaungilo Community Forest
- 2. Abide by the Namibian Labour Act

8.1.1.2 Increased trees conservation

- 1. Undertake awareness to promote the use of bricks instead of timber to make household
- 2. Price the brick reasonably to ensure affordability by the community

8.1.2 Negative Impacts

8.1.2.1 Lack of knowledge to understand the EMP

Generally, local people has little education background to understand the provisions of the EMP which could lead to litters, indiscriminatory cutting down of mature trees, uncoordinated disposal of fuel, grease, and other lubricant. To enhance understanding of the EMP, management must;

- 1. Provide an induction training to workers on the provision of the EMP,
- 2. Produce infographics of the EMP,
- 3. Translate the EMP into Oshiwambo, the local language.

8.1.2.2 Loss of Biodiversity

The area is partially cleared however a lot of mature trees where left. The preservation of remaining trees will not necessarily serve as habitat but rather to preserve mature trees on site. Furthermore, mature trees will provide shade during project operation.

Summa	ummary of Impact: Destruction of biodiversity												
Key Mi	Key Mitigation Measures:												
1. Do 1	1. Do not cut down mature trees in the area.												
2. Do 1	2. Do not plant alien trees on site												
3. Crav	3. Crawling animals such as lizards may be spotted on site, they must not be killed												
			Without M	itigation			With M	litigation					
Impact type	Probability	Severity	Scale	Duration	Significance	Confidence	Impact type	Probability	Severity	Scale	Duration	Significance	Confidence

-ve	Low	Low	Local	Immedi	Low	High	-ve	Low	Low	Local	Immediate	Low	High
				ate									
	Quantitative assessment						L	Q	uantitati	ve assessment			

8.1.2.3 Soil pollution

The project establishment should construct an equipment storage area that must have a bunded floor to prevent soil pollution from oil, grease, and lubricants.

Summa	Summary of Impact: Soil pollution												
Key Mi	Key Mitigation Measures:												
1. Storage rooms for equipment must have bunded floor													
Without Mitigation							With M	litigation					
Impact type	Probability	Severity	Scale	Duration	Significance	Confidence	Impact type	Probability	Severity	Scale	Duration	Significance	Confidence
-ve	Low	Low	Local	Immedi ate	Low	High	-ve	Low	Low	Local	Immediate	Low	High
		Q	uantitative	assessment	ţ			_	Q	uantitati	ve assessment		
-ve	2	2	1	1	4	3	-ve	1	1	1	1	1	3

8.1.2.4 Health and Safety

Site establishment involves using manual equipment such as axes to cut down trees. Worker may injure themselves while performing these activities. Establishment of the sand mining site will require removal and pilling of top soil. Excess dust could be health hazard to the workers.

Summa	Summary of Impact: Risk of Health and Safety												
Key Mi	Key Mitigation Measures:												
1. Tra	1. Train people on how to use the axe in cutting down trees,												
2. Do	2. Do not allow drunk workers to work,												
3. Pro	ovide employe	ees with	Personal Pro	otective Equ	uipment such a	s dust masks,	hand glo	ves, overal	ls, eyev	vear, and	safety boots.		
			Without M	itigation			With M	litigation					
Impact type	Probability	Severity	Scale	Duration	Significance	Confidence	Impact type	Probability	Severity	Scale	Duration	Significance	Confidence
-ve	Low	Low	Local	Immedi	Low	High	-ve	Low	Low	Local	Immediate	Low	High
	ate Quantitative assessment Quantitative assessment												
-ve													

8.2 **Project operation**

8.2.1 Positive Impact

8.2.1.1 Employment creation

Same as during project establishment

8.2.1.2 Increased tree conservation

Same as during project establishment

8.2.2 Negative Impacts

8.2.2.1 Lack of knowledge to understand the EMP

Same as during project establishment

8.2.2.2 Dust Pollution

Dust pollution during mixing of sand and cement in the concrete mixers, as well during putting sand into wheel barrows with shovel can be a health hazard to employees. However, dust pollution is minimal to be a nuisance to the community or impact visibility.

Summa	Summary of Impact: Health hazard to workers												
Key M	itigation mea	sures:											
1.	1. Provide personal protective equipment to employees such as dust mask, ear muff, eye glasses etc.												
2.	2. Do load / offload sand during heavy winds.												
3.	3. Cement and concrete must be mixed with concrete mixers and not manually in the open.												
4.	Cement bags	s must be	e stored and	disposed of	f properly and a	may not be sh	aken in th	e open.					
Without Mitigation With Mitigation													
Impact type	Probability	Severity	Extent	Duration	Significance	Confidence	Impact type	Probability	Severity	Extent	Duration	Significance	Confidence
-ve	Low	Low	Local	Immedi	Low	High	-ve	Low	Low	Local	Immedia		High
				ate									
	Quantitative assessment Quantitative assessment												
-ve	ve 2 2 1 1 4 3 -ve 1 1 1 1 1 3												

8.2.2.3 Safety risk

Typical sand mining risk public with the risk of falling into burrow pits. Sand mining of this project will be done site, which will have restricted entry. Risk could emanate from negligent handling of equipment (concrete mixers shovels, pick axe and rakes).

Summ	ary of Impa	ct: Inju	ries and he	alth risks t	o employees								
Key m	itigations												
1.	All workers	s must b	e provided	with adequ	uate Personal	Protective E	quipmen	t (PPE) (o	overall,	boots et	c)		
2.	No workers	must b	e allowed to	o be at wor	rk without add	equate PPE							
3.	Train the w	orkers c	on correct u	s of equip	ment								
		1	Without M	itigation			With N	litigation	1				
Impact type	Probability	Severity	Extent	Duration	Significance	Confidence	Impact type	Probability	Severity	Extent	Duration	Significance	Confidence
-ve	Low	Low	Local	Immedi ate	Low	High	-ve	Low	Lo w	Local	Immedi	ate Low	High
	Quantitative assessment Quantitative assessment												
-ve	ve 2 2 1 1 4 3 -ve 1 1 1 1 1 3												

8.2.2.4 Occupational health risk

Work places may lead to new social relationship, which can be catalyst for the spreading of diseases, such as HIV and AIDS. Additionally, workers may abuse alcohol. Exposure to excess noise and dust could impact employees hearing ability and lung related disease respectively thus damaging their health.

Sum	ummary of Impact: Health risks to employees during working hours												
Key	mitigations												
1.	Provide aware	ness to 1	the employe	es on dan	gers of HIV/A	AIDS, alcoho	ol, and dr	ug abuse					
2.	Provide condo	ms on s	ite										
3.	Train workers	on the p	oossible hea	lth hazard	s to avoid pot	ential risks							
4.	All workers m	ust be p	rovided wit	h adequate	e Personal Pro	otective Equi	pment (I	PPE)					
5.	No employee 1	nust be	allowed to	be at work	station withc	out adequate	PPE						
6.	There must be	a first a	id kid with	adequate	medicine								
7.													
8.	Adhere to the 1	Labour	act, non-tox	ic human	dust exposure	e levels may	not exce	ed 5mg/m	3 for r	espirator	y dust and	l 15mg/m3 fo	r total dust.
9.	Supervisors m	ust unde	ergo an occu	upational l	nealth and firs	aid course,							
			Without M	itigation			With N	Aitigation	1				
ype	ity			_	nce	ce	ype	ity			_	nce	e
let ty	abil	rity	nt	tion	fica	iden	lict t	abil	rity	nt	tion	fica	iden
Impact type	Probability	Severity	Extent	Duration	Significance	Confidence	Impact type	Probability	Severity	Extent	Duration	Significance	Confidence

-ve	Probable	Low	Local	Short	Medium	High	-ve	Low	Lo	Local	Short	Low	High
				term					w		term		
	Quantitative assessment												
		Qu	antitative	assessmen	nt				Qı	lantitati	ve assessi	ment	

8.2.2.5 Soil disturbances / Land degradation

The project will not use machinery or vehicles that could cause land degradation. Sand mining is done onsite and transported using wheelbarrows to the brick making site. This impact is therefore negligible. However, in event where the project procure machinery such as tractors, the following mitigation will be required to be applied.

Summ	ary of Impa	act: Soil er	osion										
Key m	itigations												
1. M	ovement of	machinery	must be co	ordinated a	nd restricted to	be within the	site and a	access roa	ad				
			Without M	litigation			With M	litigatior	1				
Impact type	Probability	Severity	Extent	Duration	Significance	Confidence	Impact type	Probability	Severity	Extent	Duration	Significance	Confidence
-ve	Low	Low	Local	Immedi ate	Low	High	-ve	Low	Low	Local	Immedia	ite Low	High
		Q	uantitative	assessmen	t				(Quantitati	ve assessn	nent	
-ve	2	2	1	1	4	3	-ve	1	1	1	1	1	3

8.2.2.6 Risk of contamination of ground water from oil, grease and lubricants from concrete mixers and vehicles

When concrete mixers and tractors are procured, the following mitigation will be required. The possibility of significant contamination will be negligible.

Summ	ary of Impac	t: Pollut	ion of the er	vironment	with hazardous	s waste							
Key m	itigations												
1. Ma	chinery must	be well	survived to	avoid oil sp	ills								
2. All	hydrocarbon	s must b	e stored in a	n enclosed	environment a	nd on bunded	floor.						
3. Pai	ked vehicles	must be	provided wi	th drip trays	S								
			Without M	itigation			With M	litigation					
Impact type	Probability	Severity	Extent	Duration	Significance	Confidence	Impact type	Probability	Severity	Extent	Duration	Significance	Confidence
-ve	Low	Low	Local	Immedi ate	Low	High	-ve	Low	Low	Local	Immedia	ite Low	High
	Quantitative assessment Quantitative assessment												
-ve	2	2	1	1	4	3	-ve	1	1	1	1	1	3

8.2.2.7 Heritage and Archaeological Resource

Site

2

specific

High

2

Low

2

-ve

-ve

Short

term

2

Quantitative assessment

Low

4

There are no heritage and archaeological material in the area. However, best practise requires that a chance find is developed.

ummary of Impact: Destruction of Heritage and Archaeological Materials							
Key Mitigation Measures							
1. Workers must be trained on the possible find of archaeological material in	n the area						
2. Establish a "Chance Find Procedure" where if any archaeological findi	ling (Heritage (rock painting and drawings), human remains or artefacts)						
encountered;							
3. The activity must be stopped immediately and the operation manager of th	hat activity be informed;						
. The manager must ensure the cordoning off the area with a danger tape and take appropriate records and pictures							
5. The manager must immediately report the findings to the National Museur	um (+264 61 276800) or the National Forensic Laboratory (+264 61 240461).						
Without Mitigation	With Mitigation						
npact type robability everity wtent uration uration onfidence	npact type robability sverity stent uration uration onfidence						
Impact type Probability Severity Extent Duration Significance Confidence	Impact type Probability Severity Extent Duration Significance Confidence						

High

3

High

3

Site

1

specific

Quantitative assessment

Immed

iate

1

Low

2

Low

2

Low

1

-ve

-ve

Summary of Impact: Littering and bad hygiene

Key Mitigation Measures

- 1. Ensure cleanliness on the ablution facility
- 2. All waste produced on site should be contained and disposed as at an approved waste disposal site
- 3. There must be dust bin for domestic waste collection and disposed of at an approved site
- 4. No onsite burying, dumping, or burning of waste material is allowed

			Without M	itigation			With Mitigation						
Impact type	Probability	Severity	Extent	Duration	Significance	Confidence	Impact type	Probability	Severity	Extent	Duration	Significance	Confidence
-ve	Low	High	Site specific	Short term	Low	High	-ve	Low	Low	Site specific	Immed iate	Low	High
		Q	uantitative	assessment	- ,				Qua	ntitative as	sessment		
-ve	2	2	2	2	4	3	-ve	2	1	1	1	2	3

9 DECOMMISSIONING AND REHABILITATION

To ensure human safety and the environment, the following must be undertaken at the end of the project life cycle or demolition.

- 1. Develop a decommissioning and rehabilitation plan
- 2. There must be clear signs to the public about the closure of the project
- 3. Ensure that all contaminated equipment's are properly cleaned before their disposal
- 4. The work must be supervised by a qualified and competed person.
- 5. Workers must be provided with all necessary PPE
- 6. All wasted generated must be disposed of approved sites
- 7. Revegetate the area
- 8. Ensure sand pits are properly rehabilitated

10 CONCLUSIONS AND RECOMMENDATIONS

10.1 Conclusions

The magnitude of this project is small. All possible impacts were found to be low. In anticipation for the project growth, adequate mitigation measures were developed. This is a community project, a great initiative to enhance conservation and limit deforestation.

10.2 Recommendations

It is recommended for the project to be issued with the ECC.

11 ANNEXURE

11.1 Annex 1. Pro Forma for Environmental Contract for Sand Mining

5 n	REPUBLIC OF NAMIBIA	
	RY OF ENVIRONMENT, FORESTRY AND TOURISM	
Tel: +264 61 284 2111	Départment of Environmental Affairs	Cnr of Robert Mu Kenneth Kaunda Private Bag 1330 Windhoek
PRO FORMA EN	VIRONMENTAL CONTRACT FOR SAND MINING	
Omundaungilo CF	Ohangwena Omundaungilo	Affix Revenue stamps here
Environment PART 1 A: DETAILS OF APPLICA	tal Management Act, 2007 (Section 32) NT	
1. Name (person or business): 2 Business registration/	OMUNDAUNGILO COMMUNITY FOREST	••••••
Identity no. 3. Correspondence address:		
 Correspondence address: Name of contact person; Position of contact person; Telephone or cell phone number; 	P.O.Box 13088. Fenhana, NAMIBIA EINO HAIKALI & KLAUDIA HAUFIKU CHAIRPERSON AND SECRETARY 0312962631 & 0812235040	
	N/A	
7. Fax number:		
7. Fax number: 8. Email address:	einohaikalli@gnail.com & khaufiku10@gmail.com	
8. Email address: Ne: The completion of this questionnairs is a ra- provided in this questionnaire. From this person paretionnaire. Particularity and a statistical and a statistical and a paretionnaire. Thereby certify that the particularis ph	cinohaikalli@ensii.com & khaufiku10@gmail.com equirental under Section 2013 of the Inventmental Management Add on mark the noted here that the advocant is accountable to any wrong and ective, any genson who complete: this quemonsaire must eastend ago t active, any genson who complete: this quemonsaire must eastend ago t active, any genson who complete: this quemonsaire must eastend ago t active, any genson who complete: this quemonsaire must eastend ago t active, any genson who complete: this quemonsaire must eastend ago t active, any genson who complete: this quemonsaire must eastend ago t active active the complete state the section of must eastend active active the complete state to the best of must knowledge	. 07 ul 2007. Therefore IC mil Misi-exiling information that i re declaration on the text page and heliof. Lucoderstor
8. Email address: No: The completion of this questionnairs to a transmission of the spectra of	einobaikalli@ensii.com & khaufiku10@gmail.com equirentati under Section 2014 of the Internmental Management And on must in Acted there that the advectment is accountable to any worke and active, any earson who completes this quemonstre must estated age to sective, any earson who completes this quemonstre must estated age to sective, any earson who completes this quemonstre must estated age to sective, any earson who completes this quemonstre must estated age to sective, any earson who completes this quemonstre must estated age to sective and earson to complete the section of my knowledge te may be suspended, amended or cancelled if any information <u>EINO HAIKALI</u>	07 ul 2007. Therefore it mini- hildending information both to declaration on the bat page and belief. I understan then given above is false CHAIRPERSON OTH The strength of the strength of the Position

11.2 Annex 2. Consent by Oukwanyama Traditional Authority

PART 2 A: CONSENT BY VILLAGE HEADMEN, TRADITIONAL AUTHORITY OR PRIVATE FREEHOLDER

For Village Headman 1. Name of TA headman/freehol	lder: Mr. Efraim Haihambo
2. Postal address:	P.O. Box 13145, Eenhana
3. Telephone or Mobile no.:	0812833643
4.Email address (if applicable):	efraimha8@gmail.com
For Traditional Authority or Fre	
1. Name of TA headman/freeho	Ider: Mr. Toivo Helao Shiweda
2. Postal address:	P.O.Box 13270
3. Telephone or Mobile no.:	0812694251
	2
Email address (if applicable):	
₩	
	n by the traditional authority /private freeholder (landowner)
	ocated land to Omundaungilo Community Provide to collection Ject. See attached consent faither faith the stadilional 08 -11-2023
itamp and signature of represe	ntative: 12



OUKWANYAMA TRADITIONAL AUTHORITY(OTA)

P.O. BOX, 444 Ohangwena

Tel. 065-260084 Fax. 065-260084

Inquiries: Dr. Fritz S, Nghiishililwa

(0818441662)

14 November 2023

The Chairperson/Coordinator Omundaungilo Community Forestry Project

Ohangwena region

Dear Sir/ Madam

RE: LETTER OF SUPPORT FOR OMUNDAUNGILO COMMUNITY PROJECT

During its meeting which took place on the 13 November 2023 at Omhedi Palace the Chief's Council was briefed about the envisaged project. The Council decided to endorse and support the project as it is intended to benefit the community of Omundaungilo..

The Chief's Council would like to be updated with the progress of the project and the extent to which the concern community is benefitting from it. In this respect the Chief's Council has appointed Mr Toivo Shiweda, the senior traditional councillor of Oshikunde to be updated on regular basis and to communicate same to the Chief's Council.

Thank you

Yours faithfully, <u>III</u>

Elias K. Waandja

Chairman of the Oukwanyama Traditional Authority



11.3 Annex 5. Consent by Regional Council

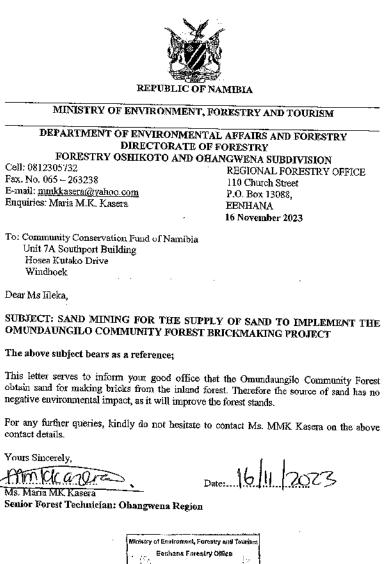
	IONAL COUNCIL OR LOCAL AUTHORITY authority represented by Chief Regional Officer (CRO) or Chief Executive
Officer (CEO)	
1. Name of <u>CRO</u> /CEO:	Mr. Fillipus H. Shilongo
2. Postal address:	Private Bag 88011, Eenhana, Namibia
3. Telephone or Mobile no:	065-246306
4. Email address (if applicab	1e): flishilongo@ Ohayman gov. no
Comment and recommenda	ation by the Chief Regional Officer or Chief Executive Officer
The Traditiona	al Authority has allocated land to Omundaungilo Community Forest
for collection	of sand for the brick making project. See attached consent letter
from the Trad	Itional Authority.
Stamp and signature of rep	resentative:
NB: The completion of this ques	tionnaire does not revoke provision as of the Rymon jefts) Management Act No. 7 of 201
for the Environmental Commiss	ioner to decide whether an activity requires an assessment but complements the proces
proposed project	i impact assessment (EIA) process may be legared depending on the magnitude of the

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11.4 Annex 4. Obligation and Compliance

e tr ... ц, PART 6: OBLIGATIONS AND COMPLIANCE The proponent recognises that its sand mining operations may have significant impacts on the environment. Accordingly the proponent undertakes that during the course of its operations it will take every practicable step necessary to ensure the mitigation of such impacts. In doing so it will comply with the objections identified in the EMP and approved by the Ministry of Environment and Tourism represented by the Environmental Commission Commissin SIGNED AT <u>Central</u> on this 15th URMberro 2B day of 15 NOV 2023 P.O.Box 13088 Eenhana 065 263 040 Fax: 065 253 238 Republic of Namibia For the proponent: gheendeks Tel: (Duly authorized thereto) For the Government of Namibia: Timoteus Mufeti Environmental Commissioner Ministry of Environment, Forestry and Tourism

11.5 Annex 4: Support by Ministry of Environmental Forestry and Tourism



Eetihana Forestry Office 16 NOV 2023 P.O.Box 13965 Bonhavia Tet: 065 761 060 Faux 065 260 218 Republic of Memilijis



11.6 Annex 5. Attendance Register

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Mengran	Meuber		Wentser	-	HEADMAN	Head Man	Mauber	Nember	member	Member	meurbar	Member	member	Adress	Head Man
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13 GABZIEC CAFLON	11 Villas Malundy	" Eifas Haller	" Jons Hansne M	" JOHNWUGS KAKOPUL N	11 KURN HISHENTON	" ZANTINI Haihambo M	20 WALTER SHILONES	21 NATALIA NELENGE	22 Kandiumwen a Veraka F	23 Demision Hosportist	" Nakalia Navisa	14 TOOPOPT	" Ludia Nambala	27 ANNA SHINMA	28 DEtrus Ngupler

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11.7 Annex 6. Free Prior Informed Consent from local headman

() 1**8** April 2024

To Whom It May Concern:

Dear Sir / Madam

SUBJECT: FREE PRIOR INFORMED CONSENT FOR THE PROPOSED SAND MINING AT <u>MUNDAUSILO</u> VILLAGE IN OMUNDAUNGILO COMMUNITY FOREST

The above subject bears reference,

I, <u>MI-EFIAIM HAIHAMBO</u> as the area Headman of <u>OMUNDAUNCILS</u> Village in Omundaungilo Community Forest under the Oukwanyama Traditional Authority fully support the abovementioned project for the benefit of our community. The project does not interfere with our traditional norms and culture. We welcome the support from the Community Conservation Fund of Namibia (CCFN) and its developing partners.

This letter to serve as a Free Prior Informed Consent for the project.

Yours Sincerely

Mr. EFRAIM HANHAMBO Name of Headman Oukwanyama Traditional Authority

DMUNDAUSGILO Village Omundaungilo Community Forest

0812833643 Cell phone Number



12 REFERENCE

- Mendelsohn J, Jarvis A & Robertson T. 2013. A profile and atlas of the Cuvelai-Etosha Basin. RAISON & Gondwana Collection
- 2. Namibian Statically Agency: Namibia 2011 population and housing census main Report