

ENVIRONMENTAL SCOPING ASSESSMENT (ESA) FOR THE PROPOSED CONSTRUCTION AND OPERATION OF A 25M CAMOUFLAGED “TREE” TELECOMMUNICATION TOWER IN THE KHOMASDAL AREA IN WINDHOEK, KHOMAS REGION.

ECC Application Reference: APP- 4224

Document Version: FINAL

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EXECUTIVE SUMMARY

Introduction

PowerCom (Pty) Ltd (The Proponent) proposes to erect and operate a 25 m high camouflaged tree network tower at Khomasdal, Windhoek, in the Khomas Region. The proposed tower site is located in the area of the Khomasdal Suburb, Khomasdal Constituency, Windhoek (Coordinates: - 22°32'30.9"S, 17°03'11.0"E). The proposed tower will be a camouflaged tree network tower, with an outdoor cabinet next to it. The total surface area of the site dedicated to tower footprint is approximately 80 m² (8m x 10m).

The rapid expansion of urban development and land use in Windhoek has led to a heavy reliance on telecommunications amongst locals, from the use of telephones, mobile phones and other electronic devices for information sharing and connections. This has brought about demand for increase in telecommunications infrastructure and services. In order to facilitate mobile connection services that run smoothly and conveniently, the services infrastructure need to be of good standard in order to provide high quality and better coverage to the mobile users.

The proposed activity will provide additional capacity, reducing congestion problems and improving network coverage in the area of Khomasdal. This will also ensure improved quality of the service provided to mobile users in the area.

Project Description

The current network shortfalls experienced and anticipated network shortfalls to mobile users in the area led to this project site selection. Project activity include establishment (construction), and eventual operations and maintenance of the network tower.

Construction Phase:

There will be minimal earthworks to prepare the site for tower construction. The construction works are expected to last for at least 3 months. The tower structure will be mounted to a concrete foundation and will not require any supporting cables. The physical assemblage of the network structure and the construction of the foundations will take place on the sites by using manual labour as far as possible. The network structure will be earthed to protect it from lightning. For

safety reasons, the tower site will be fenced off with palisade fencing to ensure that access is limited to authorised personnel and to prevent vandalism.

PowerCom intends to appoint a local contractor to carry out the construction. Works will be carried out during weekdays only. Preference for the construction works will be given to locals, i.e., contractors from Windhoek. The appointed contractor will be required to provide appropriate Personal Protective Equipment (PPE) to all their employees while carrying out the construction works on site.

Operational and Maintenance Phase:

This is the phase during which the tower and its associated infrastructure are operational, providing network signal via service providers to the residents of Khomasdal area. Maintenance of the tower will be done by the Proponent's Maintenance Department, when required. The Proponent should ensure that all employees carrying out maintenance works on site are provided with appropriate PPE.

Services and Infrastructure

Power supply: No electricity is required during the construction of the tower. However, it will be required during the operational maintenance phase of the tower. Alternating Current (AC) power will be required for the operation of the tower and will be connected to the City of Windhoek grid.

Water supply: Minimal amount of water will be required during construction. This water will be used for drinking and efficiently used for in-situ concrete mixture, i.e. the amount of water will be part of the concrete works for foundation casting. The required water will be sourced from the town. This will be upon agreement with the Municipality or relevant water supplier, who can be the nearest possible area or business owners.

Site Access (road): The site is accessible via Chrysler street and Shanghai Street in Khomasdal, which leads to a track that leads to the site of the tower.

Waste Management: There will be minimal waste generated on site. This will include general, solid, and possibly wastewater (sewage). This different waste will be handled as follows:

General and domestic waste: Sufficient waste bins (containers) will be made available at the site to manage the accumulation of general and domestic waste on site during construction. The waste bins will be disposed of at appropriate landfill site in Windhoek. The Proponent will enforce the availability of portable toilets for the construction team (contractors) while on site.

Fire Management: An appropriate of basic firefighting equipment, i.e., fire extinguishers will be readily available in vehicles, at the site.

Decommissioning Phase

Decommissioning of the network tower is not anticipated, as long as there is need for use of telecommunications and associated services in the town.

Potential Impacts identified

The potential impacts of the proposed project have been identified as they relate to the project activities in terms of a source-pathway-receptor risk-based methodology and in consultation with interested and affected parties. By considering the potential risk areas associated with the receiving biophysical and social environment, the following key impacts have been highlighted for consideration:

Potential positive impacts:

- **Telecommunication convenience:** Current and future residents (mobile users) will have an improved infrastructure and will not have to struggle with network coverage.
- **Employment creation:** Creation of a few temporary jobs during the construction of the tower.
- **General contribution to local economic development** through reliable communications services.

Potential negative impacts:

- **Physical land / soil disturbance:** Excavation activities to erect the tower could potentially lead to the disturbance of site soils.
- **Loss of Biodiversity (Avifauna)**
- **Noise and disturbance:** During tower' construction
- **Visual impact:** The presence of the tower in the neighbourhood may be a nuisance to neighbours
- **Impacts to Human Health:** short- and long-term impacts of Electromagnetic Radiation on human health.

- **Potential occupational health and safety risks** associated with mishandling of equipment.
- **Civil Aviation concerns:** The proposed site designs and locations may have an impact on civil aviation.
- **Waste Generation/Environmental Pollution:** Environmental pollution from improper disposal of waste.
- **Archaeological or cultural heritage impact** through unintentional uncovering of archaeological objects
- **Waste Generation** from improper disposal of waste generated during construction and maintenance.
- **Dust Generation** from construction works and vehicular traffic

The potential negative impacts were assessed, and mitigation measures provided accordingly, in the EMP.

Conclusion

The potential (positive and negative) impacts anticipated from the proposed construction of the telecommunication tower and related activities are identified, described, and assessed. Most of the identified potential negative impacts are rated as of Medium/Low Significance. Therefore, in order to reduce the significance to Low, it is recommended that the Proponent effectively implements the mitigation measures. In order to maintain a low significance, the implementation of measures will need to be continuously monitored in order to reduce impact to low and bring the impact under control.

It is, therefore, recommended that in the event of an ECC issuance, the conditions provided in this ESA may be appropriate to ensure minimal environmental impact for this project.

Limitations

EDS warrants that the findings and conclusion contained herein were accomplished in accordance with the methodologies set forth in the Scope of Work and Environmental Management Act (EMA) of 2007. These methodologies are described as representing good customary practice for conducting an Environmental Impact Assessment of a property for the

purpose of identifying recognized environmental conditions. There is a possibility that even with the proper application of these methodologies there may exist on the subject property conditions that could not be identified within the scope of the assessment, or which were not reasonably identifiable from the available information. The Consultant believes that the information obtained from the record review and during the public consultation processes concerning the proposed tower' construction activities/works is reliable.

Disclaimer

EDS cannot and does not warrant or guarantee that the information provided by the other sources is accurate or complete. The conclusions and findings set forth in this report are strictly limited in time and scope to the date of the evaluations. No other warranties are implied or expressed.

Some of the information provided in this report is based upon personal interviews, and research of available documents, records, and maps held by the appropriate government and private agencies. This report is subject to the limitations of historical documentation, availability, and accuracy of pertinent records and the personal recollections of those persons contacted.

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LIST OF ABBREVIATIONS

Abbreviation	Meaning
3G/4G	Third and fourth generation of wireless mobile telecommunications technology.
AC	Alternating Current
ARPANSA	Australian Radiation Protection and Nuclear Safety Agency
BID	Background Information Document
CoW	City of Windhoek
CRAN	Communications Regulatory Authority of Namibia
CV	Curriculum Vitae
DEAF	Department of Environmental Affairs and Forestry
EA	Environmental Assessment
EAP	Environmental Assessment Practitioner
ECC	Environmental Clearance Certificate

Abbreviation	Meaning
EDS	Excel Dynamic Solutions
EIA	Environmental Impact Assessment
EMA	Environmental Management Act
EMF or EME	Electromagnetic Fields or Electromagnetic Emission
EMP	Environmental Management Plan
ESA	Environmental Scoping Assessment
GG	Government Gazette
GN	Government Notice
IAPs	Interested and Affected Parties
ICAO	International Civil Aviation Organisation
ICNIRP	International Commission on Non-Ionizing Radiation Protection
MEFT	Ministry of Environment, Forestry and Tourism
MHSS	Ministry of Health and Social Services
MICT	Ministry of Information and Communication Technology
NCAA	Namibia Civil Aviation Authority
NRPA	National Radiation Protection Authority of Namibia
PPE	Personal Protective Equipment
Reg, S	Regulation, Section
TOR	Terms of Reference
WHO	World Health Organization

KEY TERMS AND DEFINITIONS

TERM	DEFINITION
Alternative	A possible course of action, in place of another that would meet the same purpose and need of the proposal.
Baseline	Work done to collect and interpret information on the condition/trends of the existing environment.

TERM	DEFINITION
Biophysical	That part of the environment that does not originate with human activities (e.g., biological, physical and chemical processes).
Cumulative Impacts/Effects Assessment	In relation to an activity, means the impact of an activity that in it may not be significant but may become significant when added to the existing and potential impacts eventuating from similar or diverse activities or undertakings in the area.
Decision-maker	The person(s) entrusted with the responsibility for allocating resources or granting approval to a proposal.
Ecological Processes	Processes which play an essential part in maintaining ecosystem integrity. Four fundamental ecological processes are the cycling of water, the cycling of nutrients, the flow of energy and biological diversity (as an expression of evolution).
Environment	As defined in Environmental Management Act - the complex of natural and anthropogenic factors and elements that are mutually interrelated and affect the ecological equilibrium and the quality of life, including – (a) the natural environment that is land, water and air; all organic and inorganic matter and living organisms and (b) the human environment that is the landscape and natural, cultural, historical, aesthetic, economic and social heritage and values.
Environmental Management Plan	As defined in the EIA Regulations (Section 8(j)), a plan that describes how activities that may have significant environments effects are to be mitigated, controlled, and monitored.
Interested and Affected Party (IAP)	In relation to the assessment of a listed activity includes - (a) any person, group of persons or organization interested in or affected by an activity; and (b) any organ of state that may have jurisdiction over any aspect of the activity. Mitigate - practical measures to reduce adverse impacts. Proponent – as defined in the Environmental Management Act, a person who proposes to undertake a listed activity. Significant impact - means an impact that by its magnitude, duration, intensity, or probability of occurrence may have a notable effect on one or more aspects of the environment.
Fauna	All the animals found in an area.

TERM	DEFINITION
Flora	All the plants found in an area.
Mitigation	The purposeful implementation of decisions or activities that are designed to reduce the undesirable impacts of a proposed action on the affected environment.
Monitoring	Activity involving repeated observation, according to a pre-determined schedule, of one or more elements of the environment to detect their characteristics (status and trends).
Proponent	Organization (private or public sector) or individual intending to implement a development proposal.
Public Consultation/Involvement	A range of techniques that can be used to inform, consult, or interact with stakeholders affected by the proposed activities.
Protected Area	Refers to a protected area that is proclaimed in the Government Gazette, according to the Nature Conservation Ordinance number 4 of 1975, as amended
Scoping	An early and open activity to identify the impacts that are most likely to be significant and require specialized investigation during the EIA work. Can, also be used to identify alternative project designs/site to be assessed, obtain local knowledge of site and surroundings, and prepare a plan for public involvement. The results of scoping are frequently used to prepare a Terms of Reference for the specialized input into full EIA.
Terms of Reference (ToR)	Written requirements governing full EIA input and implementation, consultations to be held, data to be produced and form/contents of the EIA report. Often produced as an output from scoping.

1 INTRODUCTION

1.1 Project Background and Location

Namibia is experiencing a rapid increase in the use of mobile communication services, which has led to a rise in local pressure for efforts to expand on telecommunications infrastructure. PowerCom (Pty) Ltd (The Proponent) proposes to erect and operate a 25 m high, freestanding lattice structure in Khomasdal, Windhoek. The proposed site is located in Khomasdal as indicated on the map in **Figure 1**. The total surface area of the site dedicated to tower footprint is approximately 80 m² (8m x 10m). The remainder of the site area is for storing the operational and maintenance equipment.

Telecommunication towers and related infrastructure developments are among listed activities that may not be undertaken without an Environmental Clearance Certificate (ECC), under the Environmental Management Act (EMA) (2007) and its 2012 Environmental Impact Assessment (EIA) Regulations. The relevant listed activities as per EIA regulations are:

10.1 (g) The construction of masts of any material or type and of any height, including those used for telecommunication, broadcasting, and radio transmission.

1.2 Proposed Site Ownership

The anticipated network shortfalls to mobile users in these areas triggered this site selection. The outcome of the selection criteria used provided the best potential positions of the tower.

The proposed site (location) is under the ownership of PowerCom (Pty) Ltd, with a land use (leasehold) agreement to occupy the land for the purpose of operating the proposed tower between PowerCom and Windhoek Municipality. The locality details of the site in **Table 1** below.

Table 1: Details of the proposed tower locality

Site Name:	Khomasdal
GPS Coordinates:	- 22°32'30.9"S, 17°03'11.0"E
Local Authority:	Municipality of Windhoek

Regional Administration:	Khomas Regional Council
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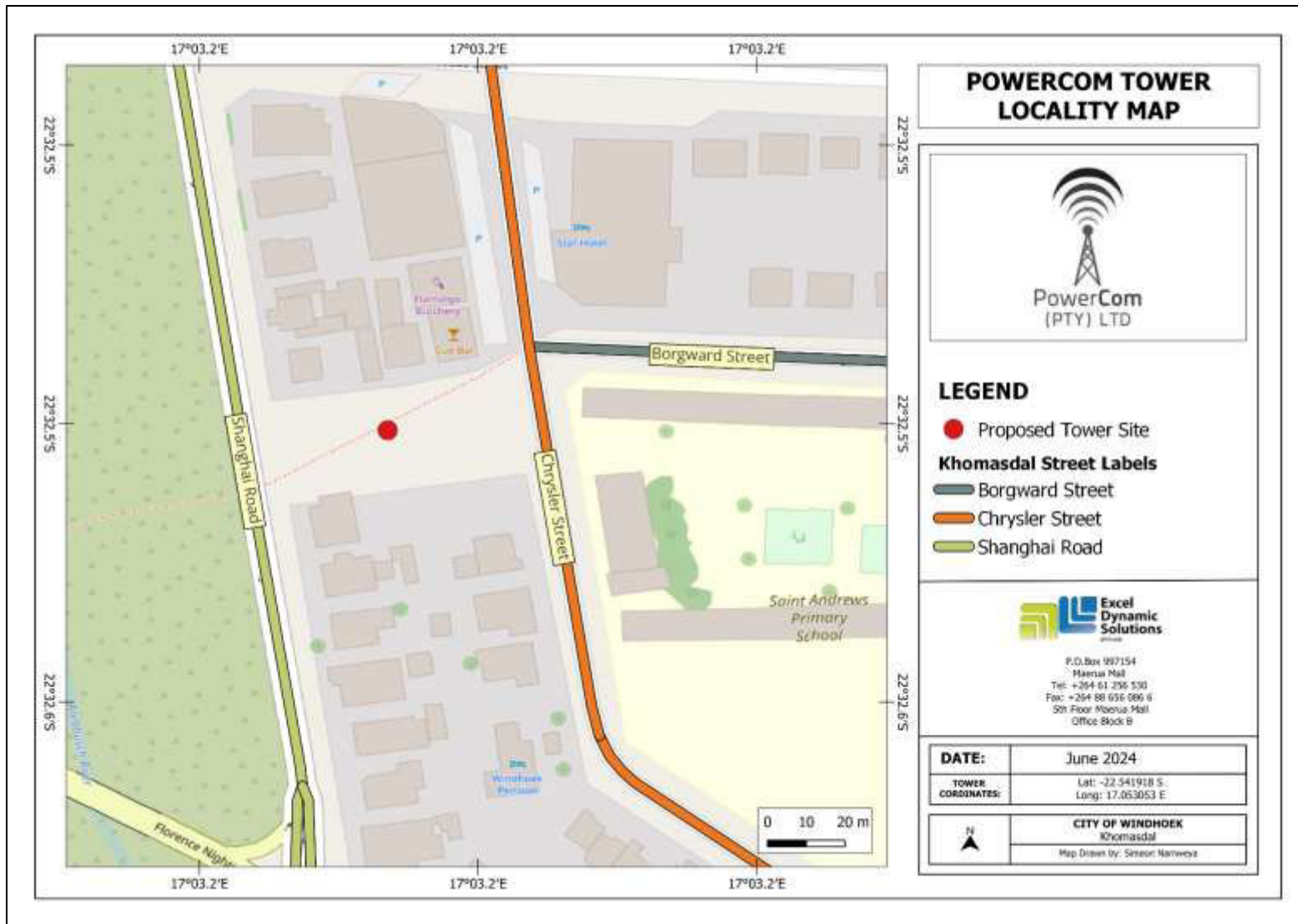


Figure 1: Locality map of proposed Khomasdal tower site

1.3 Terms of Reference (TOR), Scope of Work and Document Contents

This ESA has been conducted according to the Environmental Management Act (EMA) (No. 7 of 2007), and its 2012 Environmental Impact Assessment (EIA) Regulations. In line with the Terms of Reference provided for this project, the scope of works for this project (ESA) entails the following:

- Confirm the suitability of the proposed site for the tower construction and suggest alternative site, if required;
- Conduct the required Environmental Scoping Assessment (ESA);
- Consult all potential interested and affected parties (I&APs);
- Compile an ESA report and draft Environmental Management Plan (EMP); and
- Obtain an Environmental Clearance Certificate for the proposed tower.

The main aim of the ESA is to:

- Identify, analyse and assess the bio-physical, socio-economic impacts associated with the proposed activity; and
- compile management action plans (in the form of a draft EMP that will be implemented by the Proponent and/or their contractor(s) to minimize identified impacts, if they cannot be avoided, while maximizing positive impacts.

1.4 Motivation for the Proposed Project

Due to the continual growth in mobile communication services in Namibia, the pressure is continuously expanded and the communications network is increasing. PowerCom has identified the need for the new structure. The planned telecommunication will provide additional capacity, reducing congestion issues, while improving coverage by various service providers within that area. This proposed development will ensure that the quality of the service provided to the telecommunication users in the area is improved.

1.5 Appointed Environmental Assessment Practitioner

To satisfy the requirements of the EMA and its 2012 EIA Regulations, the Proponent appointed an independent team of Environmental Consultants at Excel Dynamic Solutions (Pty) Ltd (EDS, / Consultant / Environmental Assessment Practitioner (EAP)) to conduct the required ESA process on their behalf. The findings of the ESA process are incorporated into this Report. The ESA Report and the Draft EMP as well as associated documents will be submitted as part of the application for an ECC to the Environmental Commissioner at the DEAF.

The ESA project is headed by Mr. Nerson Tjelos, a qualified and experienced Geoscientist and experienced Environmental Assessment Practitioner (EAP). The ESA process and this Report and the Draft EMP were conducted and compiled by Mr. Mandume Leonard. The curriculum vitae (CV) for Mr. Tjelos is presented under **Appendix C**.

2 PROJECT DESCRIPTION AND PROPOSED ACTIVITIES

The description of project activity to be undertaken for the establishment (construction) and eventual operations and maintenance of the network tower are presented as follows:

2.1 Planning and Design Phase

The Communications Act No. 8 of 2009, requires that service providers should first consider sharing existing infrastructure in an area before constructing new structures. There is no other infrastructure that could be shared by network service providers in the area, therefore, PowerCom has identified the need to construct a new tower in this area.

There are criteria usually employed to optimize the positions of new structures in the telecommunication industry. These include coverage of existing network infrastructure, surrounding topography & built-up environment, established and future urban areas, required footprint and the most appropriate design of the facility (GCS Water & Environmental Consultants, 2017).

Once the Proponent has been issued with an ECC and obtained all relevant and required approvals, the planned activities will commence at the site.

The planning and design phase, which also include the ESA, is aimed at presenting some key concepts of the project alongside a general overview of the study area, the legal landscape to be

considered, and a preliminary assessment of the main aspects that might affect the feasibility of the project and or its associated activities. Thereafter, the environmental, technical, and financial aspects of the project are assessed by identifying potential risks and proposing mitigation measures where possible. This would also include highlighting 'fatal flaws' wherever mitigation measures are unavailable or impractical with regards to the available finances and other resources.

Prior to commencement of any site work, all personnel (including fully employed, contracted, and casual) will be inducted on the Proponent's Environmental, Health and Safety Policy as well as procedures and processes to follow while conducting any works related to the project on and off site.

2.1.1 Design and Technical Aspects

The proposed tower will be a 25 m high, camouflaged "tree" structure, where antennae can be mounted. The tower site will also include an outdoor cabinet, a perimeter fence, as well as electrical fencing to restrict unauthorized access. The tower will be used to provide 3G/4G coverage, in order to have proper in-door and outdoor coverage. The footprint (surface area) to be covered by the tower and associated equipment/accessories is anticipated to be 80 m² (8m x10m) with only less of that total dedicated to the actual footprints of the tower. Frequencies are determined by the operators that will utilize the tower.

Typical examples of a Camouflaged Tree Telecommunication Tower purposes are shown in **Figure 2**.



Figure 2: Example of a camouflaged tree telecommunication tower

2.2 Construction Phase

Tower construction works are expected to last for at least three months, and there will be minimal earthworks to prepare the site for construction. The tower structure will be mounted to a concrete foundation. The rest of the site area will be used for storing the operational and maintenance equipment. For safety reasons, the tower site will be fenced off with palisade fencing. This will also be done to ensure that access to the tower is only limited to authorized personnel and to prevent vandalism of the tower and its associated accessories. The tower structure will be earthed to protect it from lightning.

The physical assemblage of the network tower structure and the construction of the foundations will take place on the site by using manual labour as far as possible. The Proponent will appoint a contractor to carry out the construction. Construction works will be carried out during weekdays only, between 08h00 and 17h00. The number of workers expected for this work will depend on the local contractors appointed and their standard human capacity for development of the project.

If necessary, the appointed construction contractor will need to make arrangements for their workers to be housed in Windhoek or nearby places, but not on site. The appointed contractor will be required to provide appropriate Personal Protective Equipment (PPE) to all their employees while carrying out construction works on site.

2.3 Project Input and Resources Requirements

In terms of human resources and services infrastructure, the following will be required:

2.3.1 Project Personnel and Accommodation

The number of tower construction employees cannot be determined at this stage; it will be determined by the appointed contractor once an ECC is issued. The workforce personnel include skilled and semi-skilled workers, as necessary to complete the work.

2.3.2 Water Supply

Minimal amounts of water will be required during construction. The water will be used for drinking and efficiently used for in-situ concrete mixture for foundation casting. The required water will be sourced from municipal sources. This will be upon agreement with the Municipality or a relevant water supplier, who can be the nearest home or business owners.

2.3.3 Power Supply

No electricity is required during the construction of the tower. However, it will be required during the operational maintenance phase of the tower. Alternating Current (AC) power will be required for the operation of the tower and will be connected to the City of Windhoek grid.

2.3.4 Site Access (Roads)

The site is accessible via Chrysler street and Shanghai Street in Khomasdal, which leads to a track that leads to the site of the tower.

2.2.5 Health and Safety

Adequate and appropriate Personal Protective Equipment (PPE) will be provided to every project personnel while working at site. A first aid kit will be readily available at the site.

2.3.6 Potential Accidental Fire management

A minimum of basic firefighting equipment, i.e., a fire extinguisher will be readily available in vehicles, at site.

2.3.7 Waste Management

Any waste generated on site during construction and maintenance phases will be stored and transported to the appropriate (waste type) garbage skips or landfill sites.

During the construction phase, the Proponent will ensure the availability of portable toilets for the construction team (contractors) while on site during the construction phase, for sewage waste management. Portable chemical toilets with sealed septic tanks will be used as ablution facilities and the sewage waste handled according to the manufacturer's instructions of the facility provided.

2.3.8 Site Fencing

For safety and security reasons, the tower site will be fenced off, to ensure that access to the tower is limited to authorized personnel (such as maintenance team) only, to prevent vandalism of the tower and its associated accessories/structures.

2.4 Decommissioning Phase

As long as the use of mobile communications and other associated services is on the increase, and there is a need for such services in the area, the decommissioning of the network tower is not anticipated. Regardless, recommendations will be provided in the EMP, in the event that the network tower needs to be decommissioned.

2.5 Post-Construction Site Rehabilitation and Decommissioning

Once the construction phase has been completed, the associated works will cease, and the site cleaned up in preparation for the next phase (operations). The Proponent will need to properly decommission the construction works and rehabilitate any parts of the site that are disturbed. The aim is to ensure that the project related disturbed site areas are left close to their pre-work state as much as possible.

2.6 Operational and Maintenance Phase

This is the phase during which the tower and its associated infrastructure are operational and providing telecommunication signal to the residents and visitors of the Khomasdal area and other future land users in this part of the town. Maintenance of the tower is to be carried out by the Proponent's Maintenance Department, as and when required. No onsite accommodation will be required during this phase, as the maintenance works are not expected to last for more than a day. In the event that maintenance works are lasting more than one day, accommodation arrangements are to be made by the Proponent for their maintenance team.

The Proponent is to ensure that all employees carrying out maintenance works on site are provided with appropriate Personal Protective Equipment (PPE).

3 PROJECT ALTERNATIVES

Alternatives are defined as the “*different means of meeting the general purpose and requirements of the activity*” (EMA, 2007). This section will highlight the different ways in which the project can be undertaken and identify the alternative that will be the most practical, but least damaging to the environment.

Once the alternatives have been established, these are examined by asking the following four questions:

- (a) What alternatives are technically and economically feasible?
- (b) What are the environmental effects associated with the feasible alternatives?
- (c) What is the rationale for selecting the preferred alternative?

The alternatives considered for the proposed PowerCom tower in Windhoek are discussed under the following subsections.

3.1 Types of Alternatives Considered

3.1.1 The "No-go" Alternative

The "No-go" alternative is the option of not proceeding with the activity, which typically implies a continuation of the status quo. This would mean, the status quo of the proposed site remains unchanged with poor to no network/communication signal. Should the proposed project be discontinued, the poor network coverage in this part of Windhoek continues, and there will be no improvement in local socio-economic development, in terms of communications services.

In considering the proposed activity and its benefits to the local communities, the no-go option is not a preferred option this project, although, in the case where parts of the project site are considered environmentally sensitive and/or protected, one or several sections of the site may be identified as no-go zones.

3.1.2 Locations of the Telecommunication Tower

The location is strategically chosen as Telecom Namibia uses radio planning tools to select sites, and provides PowerCom with the instruction to apply for the intended sites. The site is chosen in order to address any network coverage issues in this selected area and provide improved network coverage. The tower site is relatively isolated, and is located at least 24 m away from the nearest residential property.

3.1.3 Infrastructure sharing as per the Communications Act of 2009: Tower Sharing

The Communications Act No. 8 of 2009 requires that service providers consider sharing existing infrastructure in the area first, before constructing new structures to avoid cumulative impacts.

There are no other telecommunication towers within the vicinity of the new proposed project site that could be used by service providers to mount their communications antennae. The proposed tower (new structure) would need to be erected (constructed) at the proposed site, in order for it to be shared in future by services providers, to promote infrastructure sharing as per the Communications Act.

4 LEGAL FRAMEWORK: LEGISLATION, POLICIES AND GUIDELINES

A review of applicable and relevant Namibian legislation, policies, and guidelines to the proposed development is given in this section. This review serves to inform the project Proponent, Interested and Affected Parties, and the decision-makers at the DEAF of the requirements and expectations, as laid out in terms of these instruments, to be fulfilled to establish the proposed tower' construction and operational activities.

4.1 The Environmental Management Act (No. 7 of 2007)

This ESA was carried out according to the Environmental Management Act (EMA) and its Environmental Impact Assessment (EIA) Regulations (GG No. 4878 GN No. 30). The EMA has stipulated requirements to complete the required documentation in order to obtain an ECC for permission to undertake certain listed activities. These activities are listed under the following Regulations:

- *10.1 (g) The construction of masts of any material or type and of any height, including those used for telecommunication, broadcasting, and radio transmission.*

4.2 The Communications Act (No. 8 of 2009)

The Act provides for the regulation of telecommunications services and networks, broadcasting, postal services and the use and allocation of radio spectrum; for that purpose, the establishment of an independent Communications Regulatory Authority of Namibia (CRAN); to make provision for its powers and functions; the granting of special rights to telecommunications licensees; the creation of an Association to manage the “.na” internet domain name space and for matters connected therewith.

Applicability to the Proposed Project: The Proponent is required to comply with the relevant Sections and Parts of the Act, and of importance is Part 5 of the Act. This Part (Special Rights of Carriers) states the following in relation to the project:

- **‘Applicability of this Part: Section 59(1)** *The rights granted by this Part are granted to all holders of technology and service neutral licences and to other licensees to whom and in so far as it has been made applicable to them in terms of section 38(12) or 38(13).*
- **(3)** *Subject to subsection (4) and (5), the rights granted by this Part, to install telecommunications facilities, only relate to wires, fibres, or any other form of telecommunication’s line as well as facilities used to protect or support such wires, fibres or lines (including poles, stays, ducts and pipes), but do not relate to masts, antennas, tower, pay telephones and other similar equipment.*
- **Entry upon and construction of lines across any land: Section 60.** *A carrier may, for the purposes of provision of telecommunications services, enter upon any land, including any street, road, footpath or land reserved for public purposes, and any railway, and construct and maintain a telecommunications facility upon, under, over, along or across any land, street, road, footpath or waterway or any railway, and alter or remove the same, and may for that purpose attach wires, stays or any other kind of support to any building or other structure.*
- **Fences: Section 64(1)** *If any fence erected or to be erected on land over which a telecommunications facility, pipe, tunnel or tube is constructed or is to be constructed by a carrier, renders or would render it impossible or inconvenient for the carrier to obtain access to that land the carrier may at its own expense erect and maintain gates in that fence and must provide duplicate keys therefor, one of which must be handed to the owner or occupier of the land.*
- **Section 64(2)** *Any person intending to erect any such fence must give not less than six weeks’ notice in writing to the carrier of his or her intention.*
- **Height or depth of cables and facilities: 66(1)** *Aerial telecommunication wires or cables along any railway or public or Private Street, road, footpath, or land must be at the prescribed height above the surface of the ground.*
- **Section 66(2)** *Underground telecommunication facilities, pipes, tunnels, and tubes must be placed by a carrier at the prescribed depth below the surface of the ground*

- **Section 66(3)** *If the owner of any private land is obstructed in the free use of his or her land by reason of the insufficient height or depth of any telecommunications wire, cable or other facility, pipe, tunnel or tube constructed by that carrier, the carrier must take such steps as are necessary for giving relief to that owner”.*

Other applicable legal obligations to the proposed tower constructions and related activities are presented in **Table 2**.

Table 2: Applicable national and international legislations governing the proposed project and related activities

Legislation/Policy/ Guideline	Relevant Provisions	Implications for this project
NATIONAL, REGIONAL AND LOCAL		
<p>The Constitution of the Republic of Namibia, 1990 as amended</p>	<p>The Constitution of the Republic of Namibia (1990 as amended) addresses matters relating to environmental protection and sustainable development. Article 91(c) defines the functions of the Ombudsman to include:</p> <p><i>“...the duty to investigate complaints concerning the over-utilisation of living natural resources, the irrational exploitation of non-renewable resources, the degradation and destruction of ecosystems and failure to protect the beauty and character of Namibia...”</i></p> <p><i>Article 95(l) commits the state to actively promoting and maintaining the welfare of the people by adopting policies aimed at the:</i></p> <p><i>“...Natural resources situated in the soil and on the subsoil, the internal waters, in the sea, in the continental shelf, and in the exclusive economic zone are property of the State.”</i></p>	<p>By implementing the environmental management plan, the establishment will be in conformant to the constitution in terms of environmental management and sustainability.</p> <p>Ecological sustainability will be main priority for the proposed development.</p>

Legislation/Policy/ Guideline	Relevant Provisions	Implications for this project
Environmental Assessment Policy of Namibia 1994	The Environmental Assessment Policy of Namibia states Schedule 1: Screening list of policies/ plans/ programmes/ project subject to environment must be accompanied by environmental assessments. "The Proposed tower activities" are on that list.	The establishment of the proposed project triggers the need for environmental assessments prior commencement of civil works as they may alter the environment which could result on the damage of the environment.
	The policy provides a definition to the term "Environment" broadly interpreted to include biophysical, social, economic, cultural, historical, and political components and provides reference to the inclusion of alternatives in all project, policies, programmes, and plans.	The construction of the tower requires the assessment of all possible environmental and social impacts to avoid, minimise or compensate environmental damage associated with the activities.
The Regional Councils Act (No. 22 of 1992)	<p>This Act sets out the conditions under which Regional Councils must be elected and administer each delineated region. From a land use and project planning point of view, their duties include, as described in section 28 "to undertake the planning of the development of the region for which it has been established with a view to physical, social, and economic characteristics, urbanisation patterns, natural resources, economic development potential, infrastructure, land utilisation pattern and sensitivity of the natural environment.</p> <p>The main objective of this Act is to initiate, supervise, manage, and evaluate development.</p>	The relevant Regional Councils are considered to be Interested & Affected Parties and must be consulted during the Environmental Assessment (EA) process. The project site fall under the Khomas Regional Council; therefore, they should be consulted.

Legislation/Policy/ Guideline	Relevant Provisions	Implications for this project
Local Authorities Act No. 23 of 1992	To provide for the determination, for purposes of local government, of local authority councils; the establishment of such local authority councils; and to define the powers, duties and functions of local authority councils; and to provide for incidental matters.	The Windhoek Municipality is the Local Authority responsible for the project site. Therefore, the Municipality should ensure that the network tower establishment activities are in compliance with the Act and its Regulations, as relevant to the proposed project.
Atomic Energy and Radiation Protection Act No. 5 of 2005	<p>To provide for adequate protection of the environment and of people in current and future generations against the harmful effects of radiation by controlling and regulating the production, processing, handling, use, holding, storage, transport and disposal of radiation sources and radioactive materials, and controlling and regulating prescribed non-ionising radiation sources; to establish an Atomic Energy Board and to provide for its composition and functions; to establish a National Radiation Protection Authority; to amend the Hazardous Substances Ordinance, 1974 (Ordinance No. 14 of 1974); and to provide for related matters.</p> <p>Under Section 43(1) of the Act, the Non-ionising Radiation Regulations have been made in 2019.</p>	<p>To determine the “safe distance” around the site.</p> <p>The Proponent should comply with the Regulations and requirements of the Act throughout the project life cycle.</p>

Legislation/Policy/ Guideline	Relevant Provisions	Implications for this project
The Aviation Act, Act No. 74 of 1962	Gives effect to certain International Aviation Conventions and makes provision for the control, regulation, and encouragement of flying within the Republic of Namibia and for other matters incidental thereto.	Provides the regulations for setting up cellular as well as other masts structures in Namibia.
Civil Aviation Act No. 6 of 2016	".....; to establish the Air Navigation Services in the Authority; to provide for a civil aviation regulatory and control framework for maintaining, enhancing and promoting the safety and security of civil aviation for ensuring the implementation of international aviation agreements; to establish the Directorate of Aircraft Accident and Incident Investigations. Section 6(1) The Minister may, by issuing a directive, require the removal of any building structure, tree or other object whatsoever on any land or water which, in the opinion of the Minister on the advice of the Executive Director, may constitute a danger to aircraft flying in accordance with normal aviation practice.	The applicable part of the Act is the establishment of the Directorate of Aircraft Accident and Incident Investigations and to provide for its powers and functions. The height of the proposed tower might be a threat to the nearest aerodrome site. Therefore, the Proponent should verify these prior to construction with the Namibia Civil Aviation Authority (NCAA).
Soil Conservation Act No. 76 of 1969	The Act makes provision for the prevention and control of soil erosion and the protection, improvement and conservation of soil, vegetation and water supply sources and resources, through directives declared by the Minister.	Duty of care must be applied for soil conservation management measures must be included in the EMP.

Legislation/Policy/ Guideline	Relevant Provisions	Implications for this project
Forestry Act No. 12 of 2001	<p>The Act provides for the management and use of forests and related products / resources. It offers protection to any living tree, bush or shrub growing within 100 metres of a river, stream or watercourse on land that is not a surveyed erven of a local authority area. In such instances, a licence would be required to cut and remove any such vegetation.</p> <p>These provisions are only guidelines.</p>	<p>Should there be trees within the actual footprint of the site that need to be removed; the Proponent should notify the nearest Department of Environmental Affairs and Forestry (Forestry Division in Windhoek (DEAF)), The number and/or type of trees to be removed to allow the construction of the tower should also be submitted to DEAF. Should these trees be of a protected species, the permit to remove them should be applied from the DEAF office.</p>
Public Health Act (No. 36 of 1919)	<p>Section 119 states that “no person shall cause a nuisance or shall suffer to exist on any land or premises 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.”</p>	<p>The Proponent and all its employees or contractors should ensure compliance with the provisions of these legal instruments.</p>
Health and Safety Regulations GN 156/1997 (GG 1617)	<p>Details various requirements regarding health and safety of labourers.</p>	

Legislation/Policy/ Guideline	Relevant Provisions	Implications for this project
Public and Environmental Health Act No. 1 of 2015	The Act serves to protect the public from nuisance and states that no person shall cause a nuisance or shall suffer to exist on any land or premises 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.	<p>The Proponent and their contractors should ensure that the project infrastructure, vehicles, equipment, and machinery are designed and operated in a way that is safe, or not injurious or dangerous to public health and that the noise which could be considered a nuisance remain at acceptable levels.</p> <p>The Proponent should ensure that the public as well as the environmental health is preserved and remain uncompromised.</p>
Pollution Control and Waste Management Bill	<p>The bill aims to “prevent and regulate the discharge of pollutants to the air, water and land” Of particular reference to the Project is: Section 21 “(1) Subject to sub-section (4) and section 22, no person shall cause or permit the discharge of pollutants or waste into any water or watercourse.”</p> <p>Section 55 “(1) No person may produce, collect, transport, sort, recover, treat, store, dispose of or otherwise manage waste in a manner that results in or creates a significant risk of harm to human health or the environment.”</p>	<p>The construction and operation/maintenance activities trigger section 21 and 22 of the Bill, activities like construction works generates lots of waste that require good management practices.</p> <p>Contractors of the construction works, and maintenance of the project should make it mandatory that they manage their waste in a manner that do not cause environmental threat and risk both to the surroundings and the local communities.</p>

Legislation/Policy/ Guideline	Relevant Provisions	Implications for this project
National Solid Waste Management Strategy	The Strategy ensures that the future directions, regulations, funding, and action plans to improve solid waste management are properly co-ordinated and consistent with national policy, and to facilitate co-operation between stakeholders. The Strategy listed priorities for the strategy to address for effective solid waste management.	The construction and operation/maintenance of the tower can potentially generate significant amount of solid waste that might need proper management by contractors to avoid pollution. Waste management plans should be compiled and implemented prior the commencement of civil works and during tower maintenance.
Road Traffic and Transport Act, No. 22 of 1999	The Act provides for the establishment of the Transportation Commission of Namibia; for the control of traffic on public roads, the licensing of drivers, the registration and licensing of vehicles, the control and regulation of road transport across Namibia's borders; and for matters incidental thereto. Should the Proponent wish to undertake activities involving road transportation or access onto existing roads, the relevant permits will be required.	Mitigation measures should be provided for since the project activities will make use of the public roads.

Legislation/Policy/ Guideline	Relevant Provisions	Implications for this project
National Heritage Act No. 27 of 2004	The Act makes provision for the protection and conservation of places and objects of heritage significance and the registration of such places and objects. Part V Section 46 of the Act prohibits removal, damage, alteration, or excavation of heritage site or remains, while Section 48 sets out the procedure for application and granting of permits such as might be required in the event of damage to a protected site occurring as an inevitable result of development. Part VI Section 55 Paragraphs 3 and 4 require that any person who discovers an archaeological site should notify the National Heritage Council. Section 51 (3) sets out the requirements for impact assessment.	The Proponent should ensure compliance with this Acts' requirement. The necessary management measures and related permitting requirements must be taken. This done by consulting with the National Heritage Council of Namibia.
The National Monuments Act (No. 28 of 1969)	The Act enables the proclamation of national monuments and protects archaeological site.	
Labour Act (No. 6 of 1992)	The Ministry of Labour, Industrial Relations and Employment is aimed at ensuring harmonious labour relations through promoting social justice, occupational health and safety and enhanced labour market services for the benefit of all Namibians. This ministry insures effective implementation of the Labour Act no. 6 of 1992.	The Proponent should ensure that the project construction and operations and maintenance, do not compromise the safety and welfare of workers.
APPLICABLE INTERNATIONAL POLICIES, PRINCIPLES, STANDARDS, GUIDELINES AND CONVENTIONS		
Statue	Provision	Implication for the project and its activities

Legislation/Policy/ Guideline	Relevant Provisions	Implications for this project
Convention on International Civil Aviation, Annex 14	<ul style="list-style-type: none"> • Annex 14 to the Convention on International Civil Aviation. • Chapter 4: Obstacle restrictions and removal <p>Chapter 6: Visual aids and donating of obstacles</p>	The proposed new structures may be obstacles to some aerodromes in Namibia. Those that are close to existing aerodromes need to be assessed in accordance with the document. Visual aids to the new structures to make them visible to aircraft need to be applied in accordance with this Convention.
“Guidelines for Limiting Exposure to Time-Varying Electric, Magnetic, and Electromagnetic Fields (up to 300GHz)” (April 1998 developed by the International Commission on Non-Ionizing Radiation Protection (ICNIRP))	Provides international standards and guidelines for limiting the adverse effects of non-ionising radiation on human health and well-being, and, where appropriate, provides scientifically based advice on non-ionising radiation protection including the provision of guidelines on limiting exposure. ICNIRP exposure limits for non-ionizing radiation is 4.5W/m ² .	Justifies the need for assessing the impact of electromagnetic radiation from the tower, on the nearby residents or community members.

The legal requirements above have been listed and explained as per their relevance to the project. The project is being carried in a specific environment that may be affected in terms of its biophysical and social features. Thus, the environmental and social baseline (receiving environment) of the project area is presented under the next chapter.

5 ENVIRONMENTAL BASELINE

The proposed tower will be constructed and operated in specific environmental and social conditions, and it is crucial to understand these pre-project conditions of the environment. This will aid in laying down background "information" of the status quo and future projections of environmental conditions after the implementation of the project. This also aids in identifying the sensitive environmental and social features that may need to be protected through the effective implementation of impact specific management and mitigation measures.

The baseline information presented below is sourced from different reports of studies conducted in the Khomas Region, as well those done for and around Windhoek. The baseline information has also been complemented by review of existing different and relevant data sources conducted in the Region and immediate surroundings of the site. The information has been complemented by raw data obtained from observations made on the site on the 21st of June 2024.

The summary of selected biophysical and social baseline information about the project area is given below.

5.1 Climate

The Khomas Region is characterized with a semi-arid highland savannah climate characterized as very hot in summer and moderate dry in winter. Windhoek has fluctuating climatic conditions. Temperature averages between 4 - 32 °C, with December being the hottest month and July the coldest. During the hottest month of the year (December) the average maximum temperatures are at about 30 - 32 °C. During the coldest month (July) the average minimum temperatures are 4 - 6 °C. Rainfall is variable and unpredictable, occurring mostly as thunderstorms, with an average rainfall between 350 – 400 mm per year, characterized by sporadic and unpredictable localized storm events between October and April. The relative humidity during the least humid months of the year (i.e. September and October) is around 10 - 20% and the most humid month is March with 70 - 80% humidity. Namibia is characterized by low humidity in general, and the lack of moisture in the air has a major impact on its climate by reducing cloud cover and rain and increasing the rates of evaporation.

Wind direction is predominantly southeasterly. Southerly, easterly and northerly airflow is also common (City of Windhoek, 2015).

	January	February	March	April	May	June	July	August	September	October	November	December
Avg. Temperature °C (°F)	22.3 °C (72.1) °F	21.2 °C (70.2) °F	20.1 °C (68.2) °F	18.1 °C (64.5) °F	15.6 °C (60.1) °F	12.5 °C (54.5) °F	12 °C (53.7) °F	15 °C (59) °F	18.7 °C (65.7) °F	21.4 °C (70.6) °F	22 °C (71.6) °F	22.7 °C (72.8) °F
Min. Temperature °C (°F)	16.4 °C (61.5) °F	15.8 °C (60.5) °F	14.8 °C (58.6) °F	12.4 °C (54.3) °F	9.3 °C (48.8) °F	5.9 °C (42.5) °F	5 °C (41) °F	7.2 °C (44.9) °F	10.3 °C (50.5) °F	13.6 °C (56.5) °F	14.6 °C (58.2) °F	15.7 °C (60.3) °F
Max. Temperature °C (°F)	28.3 °C (83) °F	26.9 °C (80.5) °F	25.8 °C (78.5) °F	24.1 °C (75.4) °F	22.3 °C (72.1) °F	19.8 °C (67.7) °F	19.7 °C (67.4) °F	23 °C (73.5) °F	27 °C (80.5) °F	29.2 °C (84.5) °F	29.4 °C (84.9) °F	29.5 °C (85.1) °F
Precipitation / Rainfall mm (in)	140 (5)	144 (5)	92 (3)	34 (1)	4 (0)	0 (0)	0 (0)	0 (0)	5 (0)	14 (0)	36 (1)	65 (2)
Humidity(%)	45%	53%	54%	49%	37%	33%	31%	22%	19%	21%	27%	33%
Rainy days (d)	10	10	9	4	1	0	0	0	1	3	4	8
avg. Sun hours (hours)	10.8	9.9	9.6	9.6	9.8	9.6	9.8	10.2	10.7	11.3	11.6	11.6

Figure 3: Shows the climate graph for the project area

5.2 Topography

The project area is located on the Khomas Hockland Plateau is a significant geographic feature located around Windhoek, the capital city of Namibia. This plateau is characterized by its rugged, mountainous terrain, with elevations ranging from 1,500 to 2,000 meters above sea level (Mendelsohn et al., 2002). The Khomas Hochland forms part of the larger Central Highlands of Namibia and is composed primarily of metamorphic and igneous rocks, including schists, quartzites, and granites from the Damara Orogeny (Miller, 2008). The plateau's landscape is marked by steep valleys and hills, created by the erosion of these ancient rocks over millions of years. Vegetation on the Khomas Hochland Plateau includes savanna grasslands and shrublands, with species adapted to the semi-arid climate, such as Acacia trees and various grasses (Mendelsohn et al., 2002). The site is located at an elevation between 1427 - 2405 meters above sea level.

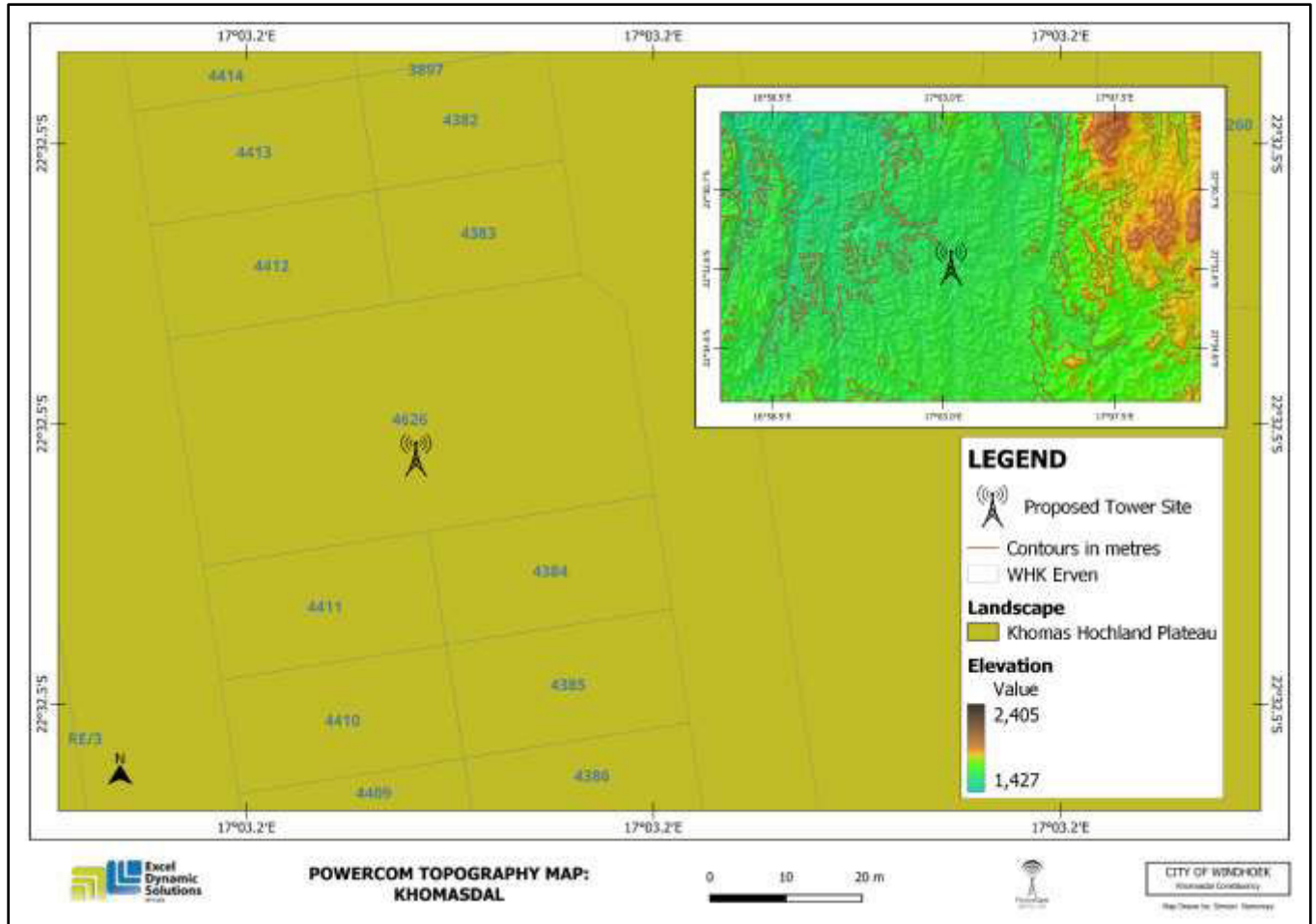


Figure 4: Landscape and topography Map - Khomasdal Tower Site

5.3 Soils

The most dominant soils in the Windhoek area are Lithic Leptosols (**Figure 5**). Soil cover in the project area is extremely thin (measuring less than 0.5 m thick) and poorly developed. The schist that occurs in the upper 0.5 m is intermediate hard excavation (Gold, Muller and Mitlin, 2001). Due to its thin soil cover and hills the project site is prone to erosion. The site is overlain by light-brown thin sand and gravel, with sparsely to moderately distributed grass and shrub cover.

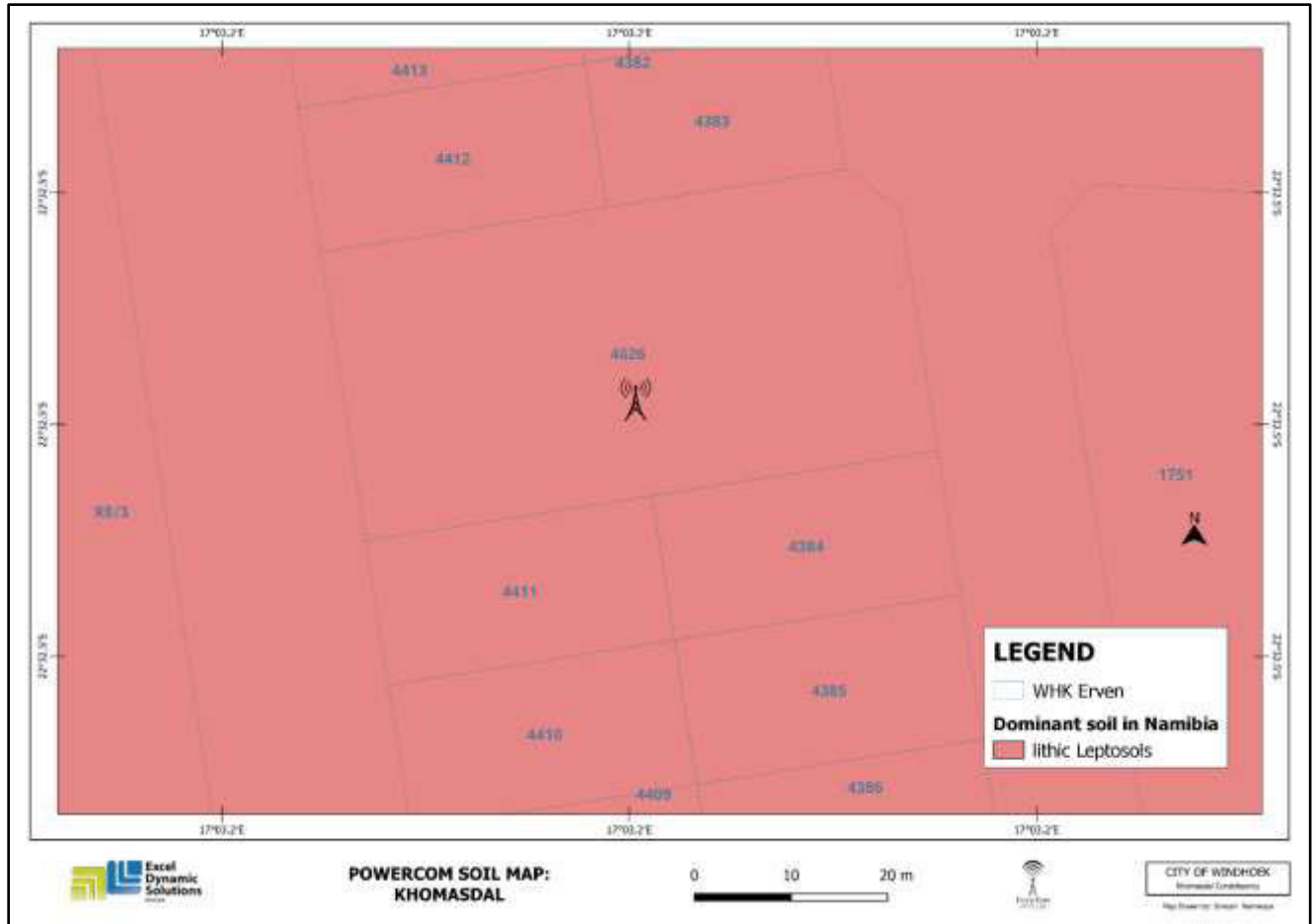


Figure 5: Soil map

5.4 Fauna and Flora

The Khomas Region harbors a recorded species number of invertebrates frogs, snakes and geckoes. Most of these organisms occur on the southern portion of the Windhoek Basin (Karijua, 2008). A portion of these is also likely to occur in the vicinity of drainage lines and other reptiles mainly in rocky habitats such as slopes and ridges. Small mammals occurring in the smaller landscape, encompass several species of bats, shrews, mice, gerbils, hares, mongooses, rats, rock dassies, porcupines, ground squirrels and black backed jackal. Antelope detections include kudu, duiker and steenbok. Herds of baboons are regular within the City of Windhoek (Stubenrauch Planning Consultants, 2004).

Due to the climatic differences within the country, Namibia has a broad variety of plant species from desert and semi-desert vegetation to evergreen subtropical plants. About 70% of Namibia is savannah. In Central Namibia, the Tree-and-shrub Savannah Biome is dominant with mixed woodlands such as Acacia Shrublands and Broadleaved woodlands of the Kalahari Sandveld (Mendelsohn et al, 2003). The vegetation within the vicinity of the proposed tower is mainly, Thornbush Shrubland (**Figures 6**).

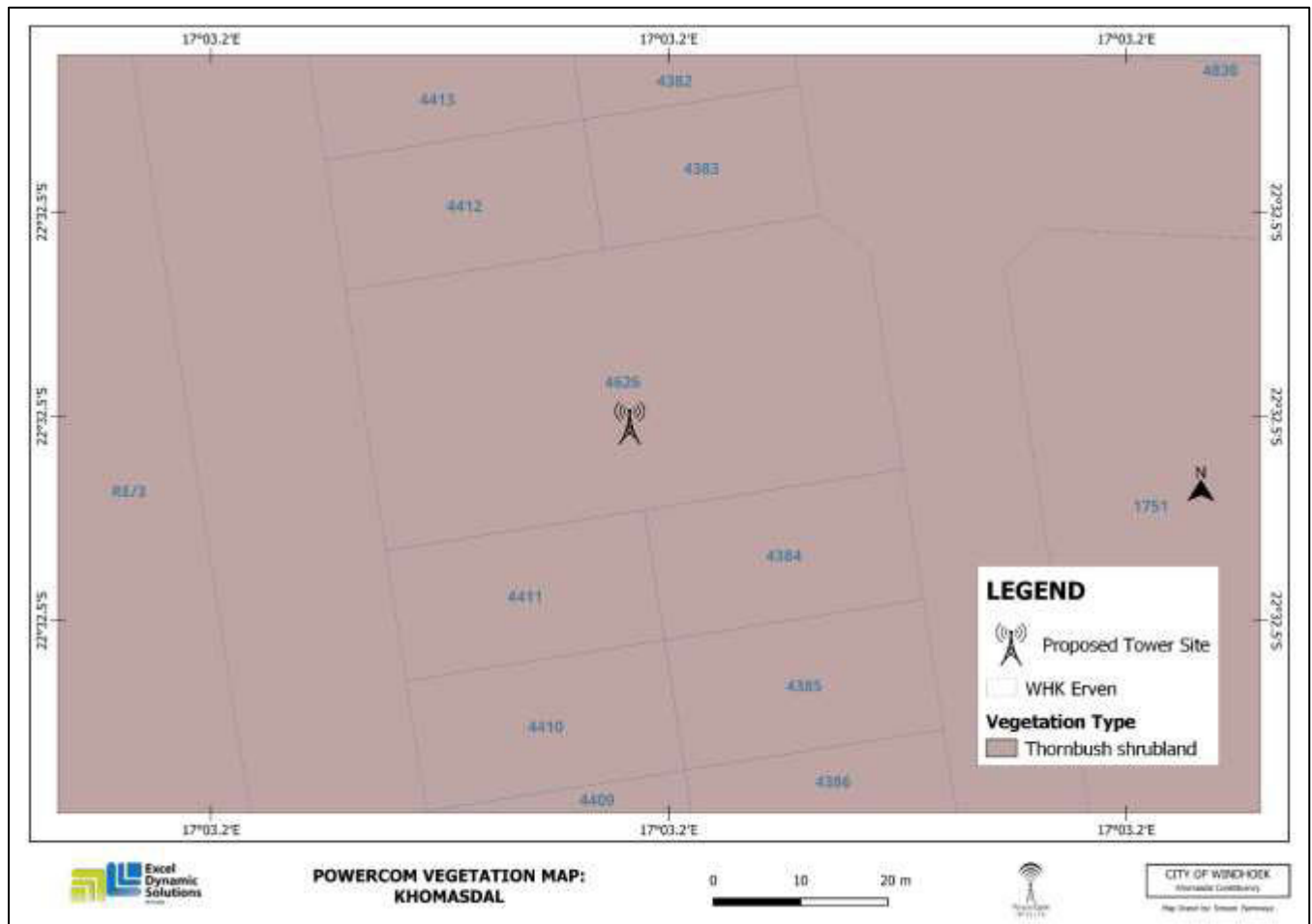


Figure 6: Vegetation map



Figure 7: Vegetation on the proposed site

5.5 Socio-economic Status

Population: The Khomasdal area of Windhoek falls under the Khomasdal Constituency of the Khomas Region. The population of Windhoek was recorded at approximately 325 858 during the 2011 Housing and Population Census.

Tourism: Various tourist attractions exist within Windhoek such as the Christ Church (a germ Lutheran church constructed from local sandstone in 1907), Heinitzburg Castle, National Museum and more located in the city centre as well various tourist accommodation establishments. Most of these attractions are dedicated to the country's anticolonial and independence struggle.

Surrounding Land Uses: The site proposed for network tower erection is located on Erf 4626, adjacent to residential area in Khomasdal suburb. The site is located at least 24 m away from the boundaries of its nearest residential neighbour, and is within the Windhoek Municipal jurisdiction.

Services Infrastructure: Khomas Region has the basic infrastructure necessary for transportation and telecommunication, while water and electricity are supplied to the urban areas. Windhoek forms an important railway junction, linking the city with the rest of the country's rail network as well as South Africa. Windhoek is centrally located, and the major national roads connect Windhoek to Namibia's southern, eastern and northern neighbours. Hosea Kutako International Airport, is located approximately 35km east of Windhoek, while Eros Airport, located within the city, links Windhoek to the rest of Namibia (KRC, 2001).

5.6 Telecommunications

It is priority for the Government to maintain and upgrade the telecommunication systems in an optimised way. For historical reasons, physical infrastructure in Namibia has been unequally distributed, to the disadvantage of indigenous Namibians. Significant improvement in infrastructure distribution has taken place around the country, however, a proportion of the urban residents continue to live without access to basic services such as water supply, adequate sanitation, electricity supply, and telecommunication services.

The country generally has wide coverage of telecommunication service provision by various service providers. However, some citizens still experience network access issues, which indicate the need for new and enhanced telecommunication infrastructure.

Residents of Windhoek are well connected to the world through different local network service providers. The main providers of this service in the town are Telecom Namibia and Mobile Telecommunications Company (MTC Namibia).

6 PUBLIC CONSULTATION PROCESS

Public consultation is an important component of an Environmental Assessment (EA). Public consultation provides potential Interested and Affected Parties (I&APs) with an opportunity to comment on and raise any issues relevant to the project for consideration as part of the

assessment process. Public consultation has been conducted in accordance with the EMA and EIA Regulations.

The public consultation process assists the Environmental Assessment Practitioner (EAP) in identifying all potential impacts and the extent to which further investigations are needed. Public consultation can also aid in the process of identifying possible mitigation measures.

6.1 Registered Interested and Affected Parties (IAPs)

The Consultant identified relevant and applicable national, regional, and local authorities, local leaders, and other interested members of the public. Pre-identified IAPs were contacted directly, while other parties who contacted the Consultant after project advertisement notices in the newspapers, were registered as IAPs upon their request. Newspaper notices of the proposed tower construction and operation activities were placed in two widely read national newspapers in the region (*The Namibian* and *New Era* Newspapers). The project advertisement/announcement ran for two consecutive weeks inviting members of the public to register as IAPs and submit their comments. The summary of pre-identified and registered IAPs is listed below and the complete list of IAPs is provided in **Appendix D**. The list of pre-identified and registered I&APs is listed in **Table 3** below.

Table 3: Summary of pre-identified Interested and Affected Parties (I&APs)

National (Ministries and State-Owned Enterprises)
Ministry of Environment, Forestry and Tourism
Ministry of Information and Communication Technology
Ministry of Urban and Rural Development
Ministry of Health and Social Services
National Radiation Protection Authority
Namibia Civil Aviation Authority
CRAN
Regional & Local
Khomas Regional Council

Khomasdal Constituency
Windhoek Municipality
General Public
Interested members of the public / Neighbors

6.2 Communication with I&APs

Regulation 21 of the EIA Regulations details the steps to be taken during a public consultation process and these have been used in guiding this process. Communication with IAPs with regards to the proposed development was facilitated through the following means and in this order:

- A Background Information Document (BID) containing brief information about the proposed facility was compiled and circulated to relevant pre-identified authorities (stakeholders), and upon request to all new registered IAPs,
- Project Environmental Assessment notices were published in *The Namibian newspaper and New Era Newspaper 17 May 2024 and 24 May 2024*, briefly explaining the activity and its locality, and inviting members of the public to register as IAPs and submit their comments/concerns.
- Project site notices were put up on electrical box around the site (**Figure 8**).
- BID deliveries were conducted at residents near the site **on 21 June 2024**, to inform members of the public about the EA process, and request them to register as IAPs, and submit comments.

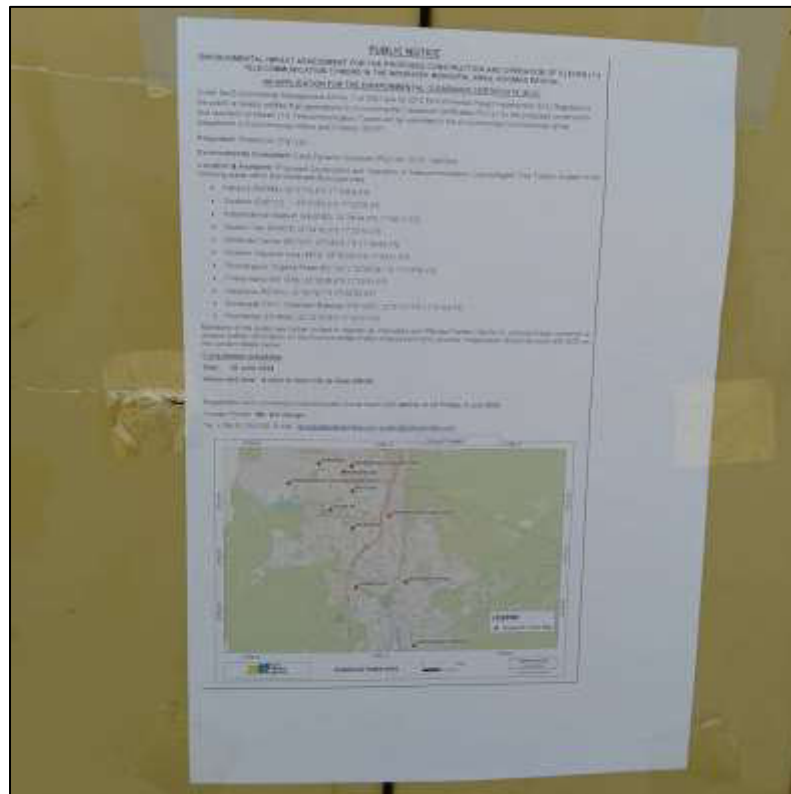


Figure 8: Site notices

6.3 Public Feedback

Public consultation was carried out according to the Environmental Management Act's EIA Regulations. Comments were received by EDS during BID distribution.

The Draft Scoping Report and EMP are circulated to all I&APs for review for a period of about 7 days. All comments received are documented in a Comments and Response Trail Document (**Appendix D**) and incorporated into the Final Report, which will be submitted to the Department of Environmental Affairs and Forestry (DEAF) for evaluation and consideration for an ECC.

Summary of input from I&APs

Site neighbour (face-to-face)	We are supporting the proposed project the area, is have issues with the internet especially the TN mobile is very slow in the area.
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7 IMPACT IDENTIFICATION, ASSESSMENT AND MITIGATION MEASURES

7.1 Identification of Potential Impacts

The proposed activities are usually associated with potential positive and negative impacts. For an environmental assessment, the focus is mainly placed on the negative impacts. This is done to ensure that these impacts are addressed by providing adequate mitigation measures such that an impact's significance is brought under control, while maximizing the positive impacts of the project to promote sustainable development and environmental and social protection. The potential positive and negative impacts that have been identified are listed as follow:

Positive impacts:

- **Telecommunications convenience:** Current and future residents will have improved access to telecommunications infrastructure and would experience less inconveniences with network coverage.
- **Employment creation:** Creation of a few temporary jobs during the construction of the tower.
- **General contribution to local economic development** through reliable communications services.

Negative impacts:

- **Physical (land/soil) disturbance:** excavation activities to erect the tower could potentially lead to site soils' disturbance.
- **Loss of Avifaunal Biodiversity**
- **Noise:** During tower' construction, the presence of the construction team and movement of heavy vehicles and machinery may disturb the immediate neighbours to the site.
- **Visual impact:** The presence of the tower in the neighbourhood may be a nuisance to locals.
- **Potential occupational health and safety risks** associated with mishandling of tower construction and operations equipment.
- **Impacts to Human Health:** Electromagnetic Radiation emitted from the antennae of cellular structures may affect human health.

- **Civil Aviation concerns:** The proposed site designs and location need to be verified to ensure that it meets the approval of the Directorate of Civil Aviation regarding the height of the masts and the position and stability of transmitters.
- **Environmental pollution/Waste generation** from improper disposal of waste generated during construction and maintenance phases.
- **Dust Generation** from construction works and vehicular traffic
- **Archaeological or cultural heritage impact** through unintentional uncovering of archaeological objects on site.

7.2 Impact Assessment Methodology

The Environmental Assessment is primarily a process used to ensure that potential impacts that may occur from project activity are identified and addressed with environmentally cautious approaches and legal compliance. The impact assessment method used for this project is in accordance with Namibia's Environmental Management Legislation (Environmental Management Act No. 7 of 2007) and its EIA Regulations of 2012.

7.2.1 Impact Assessment Criteria

The identified impacts were assessed in terms of probability (likelihood of occurring), scale/extent (spatial scale), magnitude (severity) and duration (temporal scale) as presented in **Table 4**. To enable a scientific approach to the determination of the environmental significance, a numerical value is linked to each rating scale. This methodology ensures uniformity and that potential impacts can be addressed in a standard manner so that a wide range of impacts are comparable. It is assumed that an assessment of the significance of a potential impact is a good indicator of the risk associated with such an impact. The following process will be applied to each potential impact:

- Provision of a brief explanation of the impact.
- Assessment of the pre-mitigation significance of the impact; and
- Description of recommended mitigation measures.

The recommended mitigation measures prescribed for each of the potential impacts contribute towards the attainment of environmentally sustainable operational conditions of the project for various features of the biophysical and social environment. The following criteria (**Table 4**) were applied in this impact assessment:

Table 4: Impact Assessment Criteria employed to assess the potential negative impacts

Nature	Description	Rating
Extent (Spatial scale)	An indication of the physical and spatial scale of the impact.	<p>Low (1): Impact is localized within the site boundary: Site only.</p> <p>Low/Medium (2): Impact is beyond the site boundary: Local.</p> <p>Medium (3): Impacts felt within adjacent biophysical and social environments: Regional.</p> <p>Medium/High (4): Impact widespread far beyond site boundary: Regional</p> <p>High (5): Impact extend National or over international boundaries.</p>
Duration	The timeframe, over which the impact is expected to occur, measured in relation to the lifetime of the project.	<p>Low (1): Immediate mitigating measures, immediate progress</p> <p>Low/Medium (2): Impact is quickly reversible, short-term impacts (0-5 years)</p> <p>Medium (3): Reversible over time; medium term (5-15 years).</p> <p>Medium/High (4): Impact is long-term.</p> <p>High (5): Long term; beyond closure; permanent; irreplaceable or irretrievable commitment of resources</p>
Intensity, Magnitude / Severity (Qualitative criteria)	The degree or magnitude to which the impact alters the functioning of an element of the environment. The magnitude of alteration can either be positive or negative	<p>Medium/low (4): Low deterioration, slight noticeable alteration in habitat and biodiversity. Little loss in species numbers.</p> <p>Low (2): Minor deterioration, nuisance or irritation, minor change in species / habitat / diversity or resource, no or very little quality deterioration.</p>

Nature	Description	Rating
Probability of occurrence	Probability describes the likelihood of the impacts occurring. This determination is based on previous experience with similar project and/or based on professional judgment	<p>Low (1): Improbable; low likelihood; seldom. No known risk or vulnerability to natural or induced hazards.</p> <p>Medium/low (2): Likely to occur from time to time. Low risk or vulnerability to natural or induced hazards.</p> <p>Medium (3): Possible, distinct possibility, frequent. Low to medium risk or vulnerability to natural or induced hazards.</p> <p>Medium/High (4): Probable if mitigating measures are not implemented. Medium risk of vulnerability to natural or induced hazards.</p> <p>High (5): Definite (regardless of preventative measures), highly likely, continuous. High risk or vulnerability to natural or induced hazards.</p>

7.2.2 Impact Significance

After the impact has been assessed, its significance is then determined. The impact significance is determined through a synthesis of the above impact characteristics (in Table 4 above). The significance of the impact “without mitigation” is the main determinant of the nature and degree of mitigation required. Once the above factors (**Table 4**) have been ranked for each potential impact, the impact significance of each is assessed using the following formula:

$$SP = (magnitude + duration + scale) \times probability$$

The maximum value per potential impact is 100 significance points (SP). Potential impacts were rated as high, moderate, or low significance, based on the following significance rating scale (**Table 5**).

Table 5: Significance rating scale

Significance	Environmental Significance Points	Colour Code
High (positive)	>60	H
Medium (positive)	30 to 60	M
Low (positive)	<30	L
Neutral	0	N
Low (negative)	>-30	L
Medium (negative)	-30 to -60	M
High (negative)	>-60	H

Positive (+) – Beneficial impact

Negative (-) – Deleterious/ adverse Impact

Neutral – Impacts are neither beneficial nor adverse.

For an impact with a significance rating of high (-ve), mitigation measures are recommended to reduce the impact to a medium (-ve) or low (-ve) significance rating, provided that the impact with a medium significance rating can be sufficiently controlled with the recommended mitigation measures. To maintain a low or medium significance rating, monitoring is recommended for a period to enable the confirmation of the significance of the impact as low or medium and under control.

The assessment of the construction and operational phases is done for pre-mitigation and post-mitigation.

The risk/impact assessment is driven by three factors:

- **Source: The cause or source of the contamination**
- **Pathway: The route taken by the source to reach a given receptor**
- **Receptor: A person, animal, plant, eco-system, property or a controlled water source. If contamination is to cause harm or impact, it must reach a receptor.**

The potential negative impacts stemming from the proposed activities are described, assessed and management/mitigation measures provided thereof. Further mitigation measures in a form of management action plans are provided in the Draft EMP.

7.3 Assessment of Potential Negative Impacts: Construction & Operations

The main potential negative impacts associated with the construction, operation and maintenance phases of the tower are identified and assessed below:

7.3.1 Soil Disturbance (Land Degradation) and Pollution

Excavations and land clearing to enable erection of project structures and installation of services will potentially result in soil disturbance which will leave the site soils exposed and vulnerable to erosion. This impact would be probable at a site area with little to no vegetation cover to hold the soils in place. The movement of heavy vehicles and equipment may lead to compaction of the soils during construction phase. This will, however, be a short-term and localized impact.

There is also a potential of soil pollution from accidental spills or leaks of fuel from project vehicles and machinery.

The potential impact can be rated as low if no mitigation measures are implemented, because of the moderately dense soil cover by local vegetation in the area. The impact on land and soils can also be regarded as low because of the minimal footprint of the project site. With the effective implementation of mitigation measures and monitoring, the impact significance will be reduced to a lower rate. The impact is assessed in **Table 6**.

Table 6: Assessment of the impacts of construction activities on site and surrounding soils

Mitigation Status	Extent	Duration	Intensity	Probability	Significance
Pre mitigation	L - 1	L/M - 2	M/L - 4	M - 3	L - 21
Post mitigation	L - 1	L/M - 2	L - 2	L/M - 2	L - 10

7.3.2 Loss of Biodiversity (Avifauna)

The most potentially affected fauna in tower erection projects are birds. Migrating birds are attracted to and disoriented by non-flashing obstruction warning lights on towers, especially on foggy and cloudy nights. Birds attracted to lights fly close to towers and often suffer collisions with

guy wires or tower structures. However, birds are much less attracted to flashing tower lights and elimination of the non-flashing tower lights reduces the numbers of bird collisions by as much as 70%.

The proposed tower site in Khomasdal, Windhoek, is located at least 24 m away from the nearest residential area, in the open space. Therefore, the impact is minimal. However, this does not rule out the possibility of the area and its surroundings being a migratory route for birds. In that case, the presence of the tower may impact such birds.

Before consideration of mitigation measures, the existence of a tower could lead to potential collision of birds, causing mortality among affected bird species. This impact has a Medium Significance rating, but if care is taken in refraining from the use of non-flashing lights and in properly handling equipment around any vegetation on site, the impact will significantly be reduced to a low rating. The assessment of this impact is presented in **Table 7**.

Table 7: Assessment of the impacts of the presence of the tower on Avifauna

Mitigation Status	Extent	Duration	Intensity	Probability	Significance
Pre mitigation	L/M - 2	L/M - 2	M/L - 6	M - 3	M - 30
Post mitigation	L - 1	L - 1	L - 2	L - 1	L - 4

7.3.3 Noise

Noise generated by project related vehicles and equipment during construction and operational phase can be a nuisance to the neighbours. This impact is regarded to be of minimal significance given the fact that even construction work will only be limited to certain days of the week (Monday – Friday) for the duration of the construction period. Construction related noise will be limited to the working hours between 8am and 5pm. Therefore, the noise level is bound to be limited to the site, affecting the immediate neighbours to the site. The impact can be rated as low to medium significant if no mitigation measures are implemented, but upon implementation, the impact will be of low significance. This impact is assessed in Table 7 below.

Table 8: Assessment of noise impact

Mitigation Status	Extent	Duration	Intensity	Probability	Significance
Pre mitigation	L/M - 2	L/M - 2	M - 6	M - 3	M - 30
Post mitigation	L - 1	L/M - 2	L - 2	L/M - 2	L - 10

7.3.4 Visual Impact

Telecommunication towers usually cause a visual impact on the social environment. If not planned properly, the network tower's presence will contrast the surrounding landscape and potentially become a visual nuisance to residents. Any routes created for construction works, if not properly rehabilitated, may leave landscape scars. Currently, and with no measures implemented, the visual impact can be rated as low in Significance. However, upon effectively implementing the measures, it will be significantly reduced to a much lower rating of significance. The impact is assessed **Table 9**.

Table 9: Assessment of visual impact

Mitigation Status	Extent	Duration	Intensity	Probability	Significance
Pre mitigation	L/M - 2	L/M - 2	L/M - 4	M - 3	L - 24
Post mitigation	L - 1	L - 1	L - 2	L/M - 2	L - 8

7.3.5 Potential Impact on Human Health: Radiation

Although tower operational phase health concerns were not specifically raised as a concern during the public participation process, it is a national and international topic that requires investigation, as the tower will be in proximity to some residences. Electromagnetic radiation is emitted from electrical appliances commonly used in most homes today, such as TV's, radios, cell phones, microwave ovens, electrical blankets, and computers. Studies have shown that transceiver base stations emit weaker electromagnetic radiation than most household daily appliances i.e. microwave or cell phone used close to your body (Carstens and Kuliwoye, 2012).

The health authorities around the world, including Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) and the World Health Organization (WHO), have examined the scientific evidence regarding possible health effects from signal transmitting tower. Current research indicates that there are no established health effects from the low radio frequency electromagnetic emission (RF EME) exposure encountered by the public from broadcast towers (Australian Radiation Protection and Nuclear Safety Agency, 2015).

Despite the above information from ARPANSA, the International Commission on Non-Ionizing Radiation Protection (ICNRP) provides guidance on protecting against the adverse health effects associated with electromagnetic fields (EMF) or electromagnetic emission (EME). These guidelines are based on short-term, immediate health effects such as stimulation of peripheral nerve muscles, shocks and burn caused by touching conducting objects, and elevated tissue temperatures resulting from absorption of energy during exposure to EMF/EME.

The National Radiation Protection Authority of Namibia (NRPA) under the Ministry of Health and Social Services (MHSS) is the authority tasked with the administration of the Atomic Energy and Radiation Protection Act (Act 5 of 2005). The Act specifically requires that account be taken of any guidelines published by ICNIRP regarding the radiation risks associated with Base Transceiver Station structures (National Radiation Protection Authority, Unknown date). The health impacts of radiation are explained for both short- and long-term in the Energy Board of Namibia Directive. These effects are summarized (as per the afore-mentioned Directive) as follows:

A. Short-term Radiation (Health) effects

The basic restrictions on the effects of exposure are based on established health effects. Different scientific bases were used in the development of basic exposure restrictions for various frequency ranges. Depending on the frequency, the physical quantities used to specify the basic restrictions on exposure to EMF are current density, SAR (Specific Energy Absorption Rate), and power density.

The significance of this impact is rated as Medium, and can be reduced to Low significance rating by ensuring that the sufficient mitigation measures governed by the national and international legal standards such as International Commission on Non-Ionizing Radiation Protection (ICNIRP) on infrastructure EMR emissions are adequately implemented. The impact is assessed in **Table 10**.

Table 10: Assessment of short-term impacts on health

Mitigation Status	Extent	Duration	Intensity	Probability	Significance
Pre mitigation	M – 3	M/H – 4	M/H – 8	M – 3	M – 45
Post mitigation	L/M – 2	L/M – 2	L/M – 4	L/M – 2	L - 16

B. Long-term Radiation (Health) Effects

In the case of potential long-term health effects of exposure, such as an increased risk of cancer, ICNIRP conducted that the available data are insufficient to provide a basis for this setting exposure restriction. Thus, the ICNIRP guidelines alone should not be used as a basis for protection against non-thermal effects or long-term biological effects.

The significance of this impact is considered medium to high because the long-term effect is unknown. In the context of the above, a cautionary approach is adopted, and the Precautionary Principle, which states that if an action or policy has a suspected risk of causing harm to the public or to the environment, in the absence of scientific consensus that the action or policy is harmful, the burden of proof that it is not harmful falls on those taking the action. The effective implementation of measures, the impact significance can be significantly reduced to medium and eventually low. The assessment is shown in **Table 11**.

Therefore, ICNIRP uses a reduction factor of 10 to derive at occupational limits for workers and a factor of about 50 to arrive at exposure limits for the public. This factor serves as a precautionary buffer to compensate for uncertainties in the research. By adhering to the threshold levels of ICNIRP, the precautionary measures should be sufficient to adequately address this impact. However, the risk will not be abolished, and it is recommended that the Proponent keep up to date with regards to any new literature published by ICNIRP.

It is also very crucial that the Proponent to familiarize themselves with the Non-ionising Radiation Regulations, 2019: Atomic Energy and Radiation Protection Act, 2005 attached under Appendix G of this Report.

Table 10: Assessment of long-term impacts on human health

Mitigation Status	Extent	Duration	Intensity	Probability	Significance
Pre mitigation	M – 3	H – 5	M/H – 8	M/H – 4	M – 64
Post mitigation	L/M – 2	L/M – 2	L/M – 4	L/M – 2	L - 16

7.3.6 Occupational Health and Safety

The planned project construction and operational activities can be associated with some health and safety risks. This is possible when workers involved in the project activities are exposed to health and safety risks during operations, which may lead to incidents that cause injury or

fatalities. Incidents may include accidents leading to minor injuries (i.e., superficial physical injury) or major injuries (i.e., involving heavy machinery, equipment or vehicles). Construction workers will be working at height during construction of the network tower. The lack of safety measures may potentially lead to injuries. Improper handling of construction material and equipment may cause injury.

The use of heavy equipment, especially during excavation, and erection of the tower structures may result in accidental tripping and falling of such structures. This could pose a safety risk to the project personnel, equipment, and vehicles. If machinery and equipment are not properly stored and packed, there would be risks of falling equipment and injury to workers or site visitors. The impact can be rated as medium significant if no mitigation measures are implemented, but upon implementation, the impact will be of low significance. This impact is assessed in **Table 11** below and mitigation measures provided thereof.

Table 11: Assessment of impacts of occupational health and safety

Mitigation Status	Extent	Duration	Intensity	Probability	Significance
Pre mitigation	M - 3	M/H - 3	M - 6	M/H - 4	M – 48
Post mitigation	L/M - 2	L/M - 2	L - 2	L/M - 2	L – 12

7.3.7 Potential Impact on Civil Aviation

Potential impact on civil aviation is attributed to the height and location of the site. Generally, the effective utilisation of an aerodrome can significantly be influenced by natural features and man-made constructions inside and outside its boundary. These features may result in limitations on the distance available for take-off and landing and on the range of meteorological conditions in which take-off and landing can be undertaken. For these reasons certain areas of the local airspace are regarded as integral parts of the aerodrome environment (Carstens and Kuliwoye, 2012).

A decrease in aviation safety could have severe impacts on third parties considering the potential for injury, death or damage/loss of third-party property associated with aviation accidents. In this regard, the consequences of potential incidents would affect families and communities beyond the project boundary and lifespan. The Civil Aviation Standards of the ICAO dictate that all obstructions to be erected within 8 km from an airport need to be approved by the applicable Civil Aviation Authority.

The proposed height of the tower is 25 m and the Namibia Civil Aviation Regulations (NAMCARS) require that erected structures/obstacle should not be higher than 45 m above the mean level of the landing area. The height of the tower is well within the height limit, and therefore, complies with the NAMCARS. Without the implementation of any mitigation measures can be considered slightly medium and upon the implementation of the mitigation measures, the impact will receive a low significance rating.

The National Civil Aviation Authority (Namibia Civil Aviation Authority (NCAA)) and Civil Aviation Standards of the ICAO dictate that all obstructions to be erected within 15 km and 8 km from an airport/aerodrome reference point, respectively, should be authorized. The proposed site (obstruction) is located about 7.2 km northwest of the Eros Airport, which is the nearest airport to the site. Due to the distance of the site from the nearest airport, the approval from the Namibia Airports Company (NAC) is a requirement. Additionally, the Civil Aviation Authority will need to be consulted throughout the project lifetime.

Without the implementation of any mitigation measures, the impact will receive a medium significance rating, and upon implementing the measures, this significance will be reduced to low. This impact is assessed in **Table 12** below.

Table 12: Assessment of impact of project on civil aviation

Mitigation Status	Extent	Duration	Intensity	Probability	Significance
Pre mitigation	M - 3	M/H - 4	L/M - 4	M/H - 4	M - 44
Post mitigation	L/M - 2	L/M - 2	L/M - 4	L/M - 2	L - 16

7.3.8 Waste Generation / Environmental Pollution

The two significant project phases (construction, and operations and maintenance) are associated with the generation of different waste types, ranging from domestic, sewage, and general waste. If the generated waste is not disposed of in a responsible way, land pollution may occur not only within the site boundary but also the surroundings. Improper handling, storage and disposal of hydrocarbon products and hazardous materials for instance may lead to soil and groundwater contamination, in case of spills and leakages. Waste from ablution facilities provided at site during construction may lead to pollution of land if not handled with proper care

Without any mitigation measures, the general impact of waste generation has a medium significance. The impact will reduce to low significance, upon implementing the mitigation measures. The assessment of this impact is given in **Table 13**.

Table 13: Assessment of waste generation impact

Mitigation Status	Extent	Duration	Intensity	Probability	Significance
Pre mitigation	L/M - 2	L/M - 2	M - 6	M - 3	M – 30
Post mitigation	L - 1	L - 1	L - 2	L - 1	L – 4

7.3.9 Dust Generation/Air Pollution

Dust emanating from site access roads when transporting project equipment, materials, and supply to and from site (time-to-time) may compromise the air quality in the area. The dust from construction works is anticipated to be very limited.

Possible emissions of gases from heavy vehicles and machinery may also contribute to pollution of air during construction phase. These sources of dust and emissions may lead to air pollution. This could contribute to short-term decrease in air quality, mainly around the working site.

The tower site is relatively small and localized, and the period for construction works, short. Therefore, given the relatively limited footprint size and short construction timeframe, dust, and gas emissions during the tower construction would be minimal and short-term in nature. Therefore, can be rated as low to slightly medium (significance) if no mitigation measures are implemented. However, once this is done, the impact significance can be reduced to low - (**Table 14**).

Table 14: Assessment of the impacts of the construction activities on air quality

Mitigation Status	Extent	Duration	Intensity	Probability	Significance
Pre mitigation	L/M - 2	L/M/ - 2	L - 6	M - 3	M – 30
Post mitigation	L - 1	L - 1	L - 2	L/M - 2	L – 8

7.3.10 Heritage/Archaeological resources

During construction works, historical resources may be impacted through inadvertent destruction or damage. This may include the excavation of subsurface graves or other archaeological objects when preparing the site for tower foundation laying and erection. There was no information

provided about either known heritage or site(s) of significant cultural values within or near the proposed site. Therefore, the project activities will not have an impact of great significance on these and potentially other archaeological remains, at least on surface and visible resources, if any. However, this does not mean rule out the possibility of finding some objects during the construction phase. The potential impact significance is Low if no mitigation measures, are implemented. However, after the implementation of the measures provided below, this impact significance will be lower. The assessment of the impact is shown in **Table 15** below.

Table 16: Assessment of the impacts of project activities on archaeological resources

Mitigation Status	Extent	Duration	Intensity	Probability	Significance
Pre mitigation	L - 1	L/M - 2	M/L - 4	M/L - 2	L - 14
Post mitigation	L - 1	L - 1	L - 2	L -1	L - 4

8 RECOMMENDATIONS AND CONCLUSIONS

The potential (positive and negative) impacts anticipated from the proposed construction and operation of the telecommunication tower are identified, described, and assessed. Most of the identified potential negative impacts are rated as of Medium/Low Significance. Therefore, in order to reduce the significance and maintain low significance, it is recommended that the Proponent effectively establishes and continuously implement and monitors mitigation measures as provided in the Environmental Management plan.

It is, therefore recommended that in the event of an ECC issuance, the following conditions may be appropriate to ensure minimal environmental impact for this project:

- All required permits, licenses and approvals for the proposed activities should be obtained as required.
- The Proponent complies with the legal requirements governing this type of project and its associated activities.
- All mitigations provided in this Assessment and the management action plans in the EMP should be implemented and monitoring conducted as recommended.
- All the necessary environmental and social (occupational health and safety) precautions provided should be adhered to.
- Excavated/trenched and other project related disturbed areas on the site where construction activities have been completed should be rehabilitated, as far as practicable, to their original state.
- Monitoring of the implementation of mitigation measures should be conducted, appropriate actions taken, and reporting done and recorded.
- Environmental (EMP) Compliance Monitoring must be conducted during the construction phase by the project Safety, Health and Environmental Officer or an independent Environmental Consultant and bi-annually during the operational phase. Environmental Compliance monitoring reports should be compiled and submitted to the DEAF as per provision made on the MEFT/DEAF's Portal.

These recommendations are primarily aimed at improving environmental management, ensuring sustainability and promoting harmonious co-existence of the project activities and the host biophysical and social environment.

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