



45 Feld Street, Windhoek, Namibia
PO Box 81808, Windhoek, Namibia
Tel: (+264) 61 248 614 Fax: (+264) 61 238 586 Web: www.gcs-na.biz

Environmental Management Plan for the Proposed Construction and Operation of a Telecommunication Tower on Lagoon Park, Erf 127, Walvis Bay, Erongo Region

EMP

Final

January 2023

Mobile Telecommunications Ltd



GCS Project Number: 22-0543



**Environmental Management Plan for the Proposed Construction and Operation of a
Telecommunication Tower on Lagoon Park, Erf 127, Walvis Bay, Erongo Region**

Environmental Management Plan



Version - Final

January 2023

Mobile Telecommunications Ltd

22-0543

DOCUMENT ISSUE STATUS

Report Issue	Final		
GCS Reference Number	GCS Ref - 22-0543		
Client Reference	Walvis Bay Lagoon Park Tower		
Title	Environmental Impact Assessment for the Proposed Construction and Operation of a Telecommunication Tower on Lagoon Park, Erf 127, Walvis Bay, Erongo Region		
	Name	Signature	Date
Author	Michael Cloete		January 2023
Director	Magnus van Rooyen		January 2023

LEGAL NOTICE

This report or any proportion thereof and any associated documentation remain the property of GCS until the mandator effects payment of all fees and disbursements due to GCS in terms of the GCS Conditions of Contract and Project Acceptance Form. Notwithstanding the aforesaid, any reproduction, duplication, copying, adaptation, editing, change, disclosure, publication, distribution, incorporation, modification, lending, transfer, sending, delivering, serving or broadcasting must be authorised in writing by GCS.

CONTENTS PAGE

1 OVERVIEW..... 1

1.1 PROJECT BACKGROUND 1

1.2 PURPOSE OF THE EMP 3

1.3 ENVIRONMENTAL ASSESSMENT PRACTITIONER (EAP)..... 4

1.4 LEGAL REQUIREMENTS..... 4

1.5 ASSUMPTIONS AND LIMITATIONS..... 7

1.6 REPORT STRUCTURE 7

2 ROLES AND RESPONSIBILITIES 7

2.1 PROPONENT’S REPRESENTATIVE 8

2.2 ENVIRONMENTAL CONTROL OFFICER..... 8

3 ENVIRONMENTAL MANAGEMENT PLAN ACTIONS 9

3.1 KEY POTENTIAL ENVIRONMENTAL IMPACTS TO BE MANAGED 9

3.2 PHASE 1: PLANNING AND DESIGN MANAGEMENT ACTIONS 9

3.3 PHASE 2: CONSTRUCTION PHASE MANAGEMENT ACTIONS..... 10

3.4 PHASE 4: OPERATIONAL PHASE MANAGEMENT ACTIONS 20

3.5 RECOMMENDATIONS FOR MONITORING 21

3.5.1 *Groundwater monitoring* 21

3.5.2 *EMP Compliance Monitoring* 21

4 CONCLUSION 22

LIST OF FIGURES

Figure 1-1: Locality map of proposed Telecommunication Tower, Lagoon Park 2

LIST OF TABLES

Table 1-1: Site size details 1

Table 1-2: Applicable and relevant Namibian legislations and guidelines for the EA process 4

Table 2-1: Responsibilities assigned to the Proponent’s Representative for planning and design, construction, operation and maintenance phases 8

Table 3-1: Summary of key potential environmental impacts per project phase..... 9

Table 3-2: Planning and design management actions..... 9

Table 3-3: Construction phase management actions 10

Table 3-4: Operational phase management actions..... 20

1 OVERVIEW

1.1 Project Background

Due to the increasing demand for mobile voice and data services in Namibia, there is a need to expand the existing mobile network. By embarking on this project, MTC will increase capacity and also improve quality which will benefit mobile users withing Walvis Bay area. MTC will deploy new sites equipped with mobile voice and data services that will consist of 2G/GSM, 3G/UMTS and 4G/LTE technologies. In doing this, the proposed project will ensure that the quality of the service provided to the mobile users is improved.

Mobile Telecommunications Ltd (MTC hereafter) proposes to erect a telecommunication tower within Walvis Bay, the tower in question is a tower relocation, which aims to strengthen the coverage for mobile services, inclusive of voice and data services within the subject area. Site selection was based on Radio Access Network utilization for both voice and data services. MTC proposes to erect telecommunication towers on Erf 127 Lagoon.

Table 1-1: Site size details

Location	Walvis Bay
Area size	Lagoon Park: 81 m ²

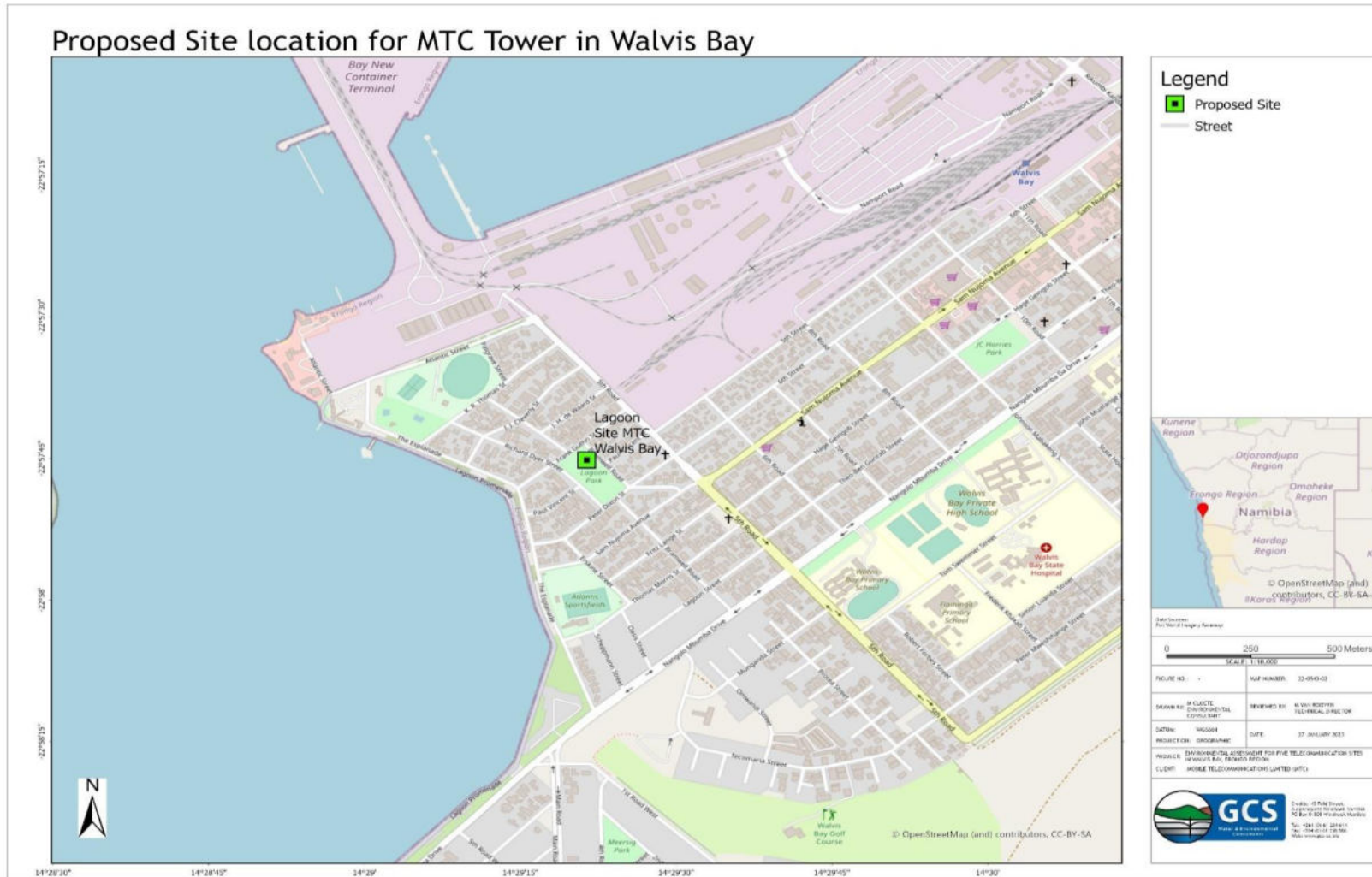


Figure 1-1: Locality map of proposed Telecommunication Tower, Lagoon Park

1.2 Purpose of the EMP

Regulation 8 of the Environmental Management Act's (EMA) (7 of 2007) Environmental Impact Assessment Regulations (2012) requires that an Environmental Management Plan (EMP) be included as part of the scoping Environmental Assessment (EA) process. A 'management plan' is defined as:

"...a plan that describes how activities that may have significant environments effects on the environment are to be mitigated, controlled and monitored."

An EMP is one of the most important outputs of the EA process as it synthesises all the proposed mitigation and monitoring actions, set to a timeline and with specific assigned responsibilities. It provides a link between the impacts identified in the Environmental Impact Assessment (EIA) Process and the required environmental management on the ground during project implementation and operation. It is important to note that an EMP is a legally binding document and a person who contravenes the provisions of this EMP may face imprisonment and/or a fine. This EMP is a living document and should be amended to adapt to project changes and/or environmental conditions and feedback from compliance monitoring.

The purpose of this document is therefore to guide environmental management throughout the following life-cycle stages of the proposed development, pre-operation (planning and design), construction, operation, and decommissioning.

The following phases are addressed in this EMP:

- **Planning and design (Pre-operation)** - the period, prior to the commencement of the construction phase, during which preliminary legislative and administrative arrangements are carried out in preparation of the proposed activities;
- **Construction** - the period during which construction of the proposed services, roads and associated infrastructure will be ongoing;
- **Operation** - the period during which the townships, proposed services, roads, and associated infrastructure will be operational.
- **Decommissioning** - The proposed activities are expected to be a permanent activity and is thus not anticipated to be decommissioned in future. As such the decommissioning impacts for the proposed activity are not assessed.

1.3 Environmental Assessment Practitioner (EAP)

GCS Water Environmental Engineering Namibia (Pty) Ltd (“GCS” hereafter) has been appointed by the Mobile Telecommunications Ltd as independent environmental consultants to conduct the required Environmental Assessment (EA) which includes compiling an EMP for the proposed development. The EMP is to be submitted with the scoping EA report as supporting documents to the application for an Environmental Clearance Certificate (ECC) to the Environmental Commissioner at the Department of Environmental Affairs (DEA) of the Ministry of Environment, Forestry and Tourism (MEFT). The EMP will also be used by Contractors as well as the Proponent in guiding them during the proposed operations to ensure that impacts on the environment are limited or avoided altogether.

1.4 Legal Requirements

The contents of the EMP must meet the requirements Section 8 (j) of the EIA Regulations. The EMP must address the potential environmental impacts of the proposed activity on the environment throughout the project life cycle. It must also include a system for assessment of the effectiveness of monitoring and management arrangements after implementation. The Municipality of Walvis Bay therefore has the responsibility to ensure that the proposed activity as well as the EIA process conforms to the principles of the EMA and must ensure that any contractors appointed by them also comply with such principles.

Table 1-2 below lists the requirements of an EMP as stipulated by Section 8 (j) of the EIA Regulations.

Table 1-2: Applicable and relevant Namibian legislations and guidelines for the EA process

Legislation	Permit/Approval/Requirement	Contact Details
Environmental Management Act 2007 Environmental Impact Assessment (EIA) Regulations (EIAR) (GG No. 4878)	Amendments (required every 3 years) to this EMP will require an amendment of the ECC for these developments. Activities listed in Government Notice (GN) No. 29 of GG No. 4878 require an ECC.	Mr Damian Nchindo Department of Environmental Affairs, Ministry of Environment, Forestry and Tourism Tel: 061 284 2701
Water Act 54 of 1956	Prohibits the pollution of underground and surface water bodies (S23 (1)). Liability of clean-up costs after closure/abandonment of an activity (S23 (2)).	Mr Witbooi (Department of Water Affairs): Tel: (061) 208 7226

Legislation	Permit/Approval/Requirement	Contact Details
<p>Water Resources Management Act No.11 of 2013</p>	<p>The act provides for the management, protection, development, use and conservation of water resources; and provides for the regulation and monitoring of water services and to provide for incidental matters. The objects of this Act are to:</p> <p>Ensure that the water resources of Namibia are managed, developed, used, conserved and protected in a manner consistent with, or conducive to, the fundamental principles set out in Section 66 - protection of aquifers, Subsection 1 (d) (iii) provide for preventing the contamination of the aquifer and water pollution control (Section 68).</p>	
<p>Forestry Act 12 of 2001</p>	<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>If there are trees within the proposed footprint of the project area that need to be removed, the proponent should notify the local Forestry Department of the number and/or type of trees to be removed and apply for permit to remove protected tree species.</p>

Legislation	Permit/Approval/Requirement	Contact Details
Namibia Urban and Regional Planning Act No 5 of 2018	To consolidate the laws relating to urban and regional planning; to provide for a legal framework for spatial planning in Namibia; to provide for principles and standards of spatial planning; to establish the urban and regional planning board; to decentralise certain matters relating to spatial planning; to provide for the preparation, approval and review of the national spatial development framework, regional structure plans and urban structure plans; to provide for the preparation, approval, review and amendment of zoning schemes; to provide for the establishment of townships; to provide for the alteration of boundaries of approved townships, to provide for the disestablishment of approved townships; to provide for the change of name of approved townships; to provide for the subdivision and consolidation of land; to provide for the alteration, suspension and deletion of conditions relating to land; and to provide for incidental matters	Mr Tobias Nwaya Ministry of Urban and Rural Development tnewaya@murd.gov.na
Roads Ordinance 17 of 1972	<ul style="list-style-type: none"> • Section 3.1 deals with width of proclaimed roads and road reserve boundaries • Section 27.1 is concerned with the control of traffic on urban trunk and main roads • Section 36.1 regulates rails, tracks, bridges, wires, cables, subways or culverts across or under proclaimed roads • Section 37.1 deals with Infringements and obstructions on and interference with proclaimed roads. 	Ms Elina Lumbu Roads Authority Specialised road Legislation, Advise & Compliance lumbue@ra.org.na

1.5 Assumptions and Limitations

This EMP has been drafted with the acknowledgment of the following assumptions and limitations:

- This EMP has been drafted based on the scoping-level Environmental Impact Assessment (EIA) inclusive of a hydrogeological assessment for the proposed development. No additional specialist studies were included as part of the assessment; and
- The mitigation measures recommended in this EMP document is based on the risks/impacts in the scoping report which were identified based on the provided project description and site investigation. Should the scope of the project change, the risks will have to be reassessed and mitigation measures provided accordingly.

1.6 Report Structure

This EMP lays out the management actions for the proposed township establishment activities. The EMP addresses the following phases:

- **Planning and design (Pre-construction)** - the period, prior to the commencement of the construction phase, during which preliminary legislative and administrative arrangements are carried out in preparation of the proposed activities;
- **Construction** - the period during which construction of the proposed services, roads and associated infrastructure will be ongoing;
- **Operation** - the period during which the townships, proposed services, roads and associated infrastructure will be operational.
- **Decommissioning** - The proposed activities are expected to be a permanent activity and is thus not anticipated to be decommissioned in future. As such the decommissioning impacts for the proposed activity are not assessed.

2 ROLES AND RESPONSIBILITIES

Mobile Telecommunications Ltd (the Proponent) is ultimately responsible for the implementation of the EMP. The Proponent may delegate this responsibility at any time, as they deem necessary, from planning and design to operation and maintenance phase (if considered). The delegated responsibility for the effective implementation of this EMP will rest on the following key individuals which may be fulfilled by the same person:

- Proponent's Representative; and
- Environmental Control Officer.

2.1 Proponent's Representative

If the Proponent does not personally manage all aspects of the planning and design, construction and operation and maintenance phase activities and decommissioning, referred to in this EMP, they should assign this responsibility to a suitably qualified individual referred to in this plan as the Proponent's Representative (PR). The Proponent may decide to assign the role of a PR to one person for both phases. Alternatively, the Proponent may decide to assign a separate PR for each component i.e. planning and design, construction, operation and maintenance phase. The PR's responsibilities are included in **Table 2-1** below.

Table 2-1: Responsibilities assigned to the Proponent's Representative for planning and design, construction, operation and maintenance phases

Responsibility	Project Phase
Managing the implementation of this EMP and updating and maintaining it when necessary	Throughout the lifetime of the project
Management and monitoring of individuals and/or equipment on-site in terms of compliance with this EMP	Throughout the lifetime of the project
Issuing fines for contravening EMP provisions	Throughout the lifetime of the project

2.2 Environmental Control Officer

The Proponent should assign the responsibility of overseeing the implementation of the whole EMP on the ground from the planning and design phase to operation and maintenance phase to a designated person, referred to in this EMP as the Environmental Control Officer (ECO). The Proponent may decide to assign this role to one person for both phases or may assign separate individual ECOs to oversee EMP implementation during each phase. The ECOs will have the following responsibilities:

- Management and facilitation of communication between the Proponent, PR and Interested and Affected Parties (I&APs) with regard to this EMP;
- Conducting site inspections (recommended minimum frequency is monthly during construction and bi-annually during operation) of all areas with respect to the implementation of this EMP (monitor and audit the implementation of the EMP);
- Advising the PR on the removal of person(s) and/or equipment not complying with the provisions of this EMP;
- Making recommendations to the PR with respect to the issuing of fines for contraventions of the EMP; and
- Undertaking an annual review of the EMP and recommending additions and/or changes to this document.

3 ENVIRONMENTAL MANAGEMENT PLAN ACTIONS

3.1 Key Potential environmental impacts to be managed

From the EA, the following key potential impacts have been identified per project phase and are summarised in **Table 3-1** below. The full impact description is presented in the tables under subchapter 3.2 to 3.5 as well as in the Scoping Report.

Table 3-1: Summary of key potential environmental impacts per project phase

	Project Phase	Potential impacts identified in the EA
1	Pre-Construction	Biodiversity
2	Construction	Biodiversity, surface and groundwater contamination, soil erosion and safety, archaeological, health and safety, dust, noise, waste, and social impacts.
3	Operation	Traffic, soil, surface and groundwater, noise, dust, waste, and social impacts.

The aim of the management actions of the EMP is to avoid potential impacts where possible. Where impacts cannot be avoided, measures are provided to reduce the significance of these impacts.

Management actions recommended to manage the potential impacts rated in the EA carried out for the proposed development are presented in the following tables. The management actions were compiled based on the three project phases:

- Planning and design phase (pre-construction) (**Table 3-2**);
- Construction (**Table 3-3**);
- Operation and maintenance phase management actions (**Table 3-4**).

The responsible persons at the Municipality of Walvis Bay should assess these commitments in detail and should acknowledge their commitment to the specific management actions detailed in the table of the next subchapters.

3.2 Phase 1: Planning and Design Management Actions

The management requirements detailed in **Table 3-2** need to be carried out before any activities commence on site while necessary preliminary legislative and administrative arrangements are made in preparation for the proposed activities on site.

Table 3-2: Planning and design management actions

Aspect	Management Requirement
Labour Recruitment	The following provisions designed to maximise the use of local labour should be included within tenders concerning construction activities:

Aspect	Management Requirement
	<ul style="list-style-type: none"> • Provision stating that all unskilled labour should be sourced from local communities. • Specific recruitment procedures ensuring local firms enjoy preference during tender adjudications. • Provisions promoting gender equality pertaining to recruitment.
EMP Implementation	<ul style="list-style-type: none"> • The proponent should appoint a Proponent's Representative (PR) that will act as their on-site implementing agent. • This person should be responsible to ensure that the Proponent's responsibilities are executed in compliance with relevant legislation and this EMP.

3.3 Phase 2: Construction Phase Management Actions

The management actions for the construction phase during which the construction activities will take place are listed in Table 3-3.

Table 3-3: Construction phase management actions

Environmental Feature	Impact	Management Actions
EMP training	Lack of EMP awareness and the implications thereof	<ul style="list-style-type: none"> • Employees appointed for construction work must ensure that all personnel are aware of necessary health, safety, and environmental considerations applicable to their respective work.
Monitoring	EMP non-compliance	<ul style="list-style-type: none"> • The ECO or the Proponent/Proponents Representative should monitor the implementation of this EMP. • The Proponents Representative should inspect the site throughout the construction phase at least on a monthly basis. • Bi-annual audits should be conducted of site activities by an external ECO.
Waste Management	Visual impact and soil contamination	<ul style="list-style-type: none"> • The construction site should always be kept tidy. • All domestic and general waste produced daily should be cleaned and contained daily. • No waste may be buried or burned.

Environmental Feature	Impact	Management Actions
		<ul style="list-style-type: none"> • Waste containers (bins) should be emptied regularly and removed from site to the nearest municipal waste disposal site. • All recyclable waste needs to be taken to the nearest recycling depot. • A sufficient number of separate waste containers (bins) for hazardous and domestic / general waste must be provided on site. • Construction workers should be sensitised to dispose of waste in a responsible manner and not to litter. • No waste may remain on site after the completion of the project.
Hazardous Waste	Soil and groundwater contamination	<ul style="list-style-type: none"> • All heavy construction vehicles and equipment on site should be provided with a drip tray. • All heavy construction vehicles should be maintained regularly to prevent oil leakages. • Maintenance and washing of construction vehicles should take place only at a designated workshop area.
Wastewater	Groundwater contamination	<ul style="list-style-type: none"> • Use of the toilets instead of the veld must be strictly adhered to. • If grey water can be collected from ablution facilities at the contractors' camp it should be recycled and: <ul style="list-style-type: none"> ○ Used for dust suppression; ○ Used to water vegetable gardens or to support a small nursery in local communities (as and when agreed upon by such communities); and/or ○ Used to clean equipment. • All run off materials such as wastewater and other potential contaminants should be contained on site and disposed of in accordance with municipal wastewater discharge standards, so that they do not reach to ground or surface water systems.

Environmental Feature	Impact	Management Actions
		<ul style="list-style-type: none"> Wastewater (excluding sewage) should be drained into lined / impermeable catch pits, big enough for daily / weekly usage without overflowing. Water from these catch pits should be removed from site to the nearest wastewater treatment facility by an approved wastewater removal company.
Shallow groundwater occurrences	Groundwater quality	<ul style="list-style-type: none"> Ensure all dewatered groundwater is discharged to the closest drainage line; or back to the downstream environment via artificial discharge points (i.e. swales or attenuation ponds). Groundwater quality is to conform to the relevant standards for discharge into the environment.
Soil	Soil contamination	<p>The following spill control preventative measures should be put in place to manage soil contamination.</p> <ul style="list-style-type: none"> An impermeable liner should be laid down (particularly beneath cement mixers) on the site area in order to prevent contaminants from reaching to surrounding soils and eventually groundwater systems. Potential contaminants such as wastewater should be contained on site and disposed of in accordance with municipal wastewater discharge standards so that they do not contaminate surrounding soils. Contaminants such as hydrocarbons should be stored, handled, and managed appropriately. These must be collected on site and disposed at an appropriate facility that is licenced to receive such waste. Soil contamination should be monitored on site daily by PR and monthly by ECO. ECO(s) should ensure that a sufficient number of drip trays are available on-site and that these are utilised in the event of leakage from construction trucks or vehicles.

Environmental Feature	Impact	Management Actions
		<ul style="list-style-type: none"> • Contaminated soils onsite that may have resulted from leakage/spillage construction vehicles or equipment should be removed to a depth dependent on the size of the spill and replaced with clean soil. The contaminated soil should be removed and disposed at a designated landfill site suitable to receive contaminated soil, and a waste manifest should be kept as a record thereof. • Visual soil assessment for signs of contamination at vehicle holding, parking and activity areas. • Place oil drip trays under parked construction vehicles and hydraulic equipment at the site.
Soil	Soil interflow processes Soil structure and land capability Soil quality	<ul style="list-style-type: none"> • Only excavate areas applicable to the project area. • Backfill the material in the same order it was excavated to reduce contamination of deeper soils with shallow oxidised soils. • Cover excavated soils with a temporary liner to prevent contamination. • Keep the site clean of all general and domestic wastes. • All development footprint areas to remain as small as possible and vegetation clearing to be limited to what is essential. • Exposed soils to be protected using a suitable covering or revegetating. • Existing roads should be used as far as practical to gain access to the site. • Have emergency fuel & oil spill kits on site.
Biodiversity	Loss of Biodiversity	<ul style="list-style-type: none"> • Trees with a trunk size of 150 mm and bigger should be surveyed, marked with paint (readily visible), and protected.

Environmental Feature	Impact	Management Actions
		<ul style="list-style-type: none"> • The Proponent should only remove trees/plants within the actual footprint of the specific project activities. Trees/plants that are not within the footprint should be left to preserve biodiversity in the area. • If cleared, the numbers of protected, endemic and near endemic species removed should be documented. • Trees and plants protected under the Forest Act No 12 of 2001 are not to be removed without a valid permit from the local Department of Forestry.
Dust and noise	Nuisance impacts	<ul style="list-style-type: none"> • The contractor(s) should suppress dust associated with construction activities by using a reasonable amount of water. • If feasible, wastewater should be treated to an acceptable water quality level, so that it can be used for dust suppression, if needed. • Noise levels during construction activities should be kept within the allowable standards for urban areas. • Noise levels should adhere to the SANS restrictions on noise. • Work hours should be restricted to between 08h00 and 17h00 due to the use of heavy equipment, power tools and the movement of heavy vehicles. • Noisy equipment should be shut down when not in use (when not needed) to avoid unnecessary noise on site. • Workers performing noisy tasks should be rotated regularly (work on shifts) to avoid exposing them to excessive noise for a long period of time in a day. • Workers should be equipped with personal protective equipment (PPE) such as earplugs to reduce noise exposure. • Workers should ensure that they wear the necessary PPE at all times on work sites.

Environmental Feature	Impact	Management Actions
Health and Safety	Health and safety impacts	<ul style="list-style-type: none"> • The contractor(s) should ensure that all personnel are provided with personal protective equipment (PPE), such as coveralls, gloves, safety boots, safety glasses and hard hats at all times. • Workers should ensure that they wear the PPE at all times on work sites. • No workers should be allowed to drink alcohol during working hours. • No workers should be allowed on site if under the influence of alcohol. • An appropriate location should be indicated on the site for the parking of construction and operation vehicles. • No unauthorised access should be allowed to the construction sites.
Construction labourers	General health and safety	<ul style="list-style-type: none"> • The Proponent should ensure that locals from the surrounding areas are employed for any unskilled labour. • Proper employment recruitment procedures are to be followed. Construction labourers should not be recruited on-site. • A suitable number of portable toilets (i.e., easily transportable) should be available on site. • Separate ablutions should be available for men and women and should clearly be indicated as such. • Sewage waste needs to be removed on a regular basis to the nearest approved sewage disposal site. • Workers responsible for cleaning the toilets should be provided with latex gloves and masks. • No workers may reside on-site for the entire duration of the construction period. Only a security guard will be allowed to sleep on-site (if there will be any).

Environmental Feature	Impact	Management Actions
		<ul style="list-style-type: none"> • The Proponent or contractor should draft a Communication Plan, which should outline as a minimum the following: <ul style="list-style-type: none"> ○ How stakeholders, who require ongoing communication for the duration of the construction period, will be identified and recorded and who will manage and update these records. ○ How these stakeholders will be consulted on an ongoing basis. • Provision should be made for a grievance mechanism - outlining how concerns will be lodged/recorded and how feedback will be delivered, inclusive of further steps of arbitration in the event that feedback is deemed unsatisfactory. • Stakeholders need to be informed of the communication plan once drafted to ensure they are aware of the relevant communication channels.
Water	Groundwater contamination	<ul style="list-style-type: none"> • No wastewater / effluent should be allowed to leave the site premises without proper control. • These should be disposed of in accordance with municipal wastewater discharge standards. • Regular maintenance and monitoring of construction equipment and vehicles should be done to detect early spills or leakages. • An emergency plan should be available for major / minor spills at the construction site during operation activities (with consideration of air, groundwater, soil, and surface water). • Groundwater impact awareness training should be provided to the employees involved in this phase.
Archaeology	Loss of heritage resources	<ul style="list-style-type: none"> • Should a heritage site or archaeological site be uncovered or discovered during the construction phase of the project, a “chance find” procedure should be applied in the order they appear below:

Environmental Feature	Impact	Management Actions
		<ul style="list-style-type: none"> ○ If operating machinery or equipment, stop work; ○ Demarcate the site with danger tape; ○ Determine GPS position if possible; ○ Report findings to the construction foreman; ○ Report findings, site location and actions taken to superintendent; ○ Cease any works in immediate vicinity; ○ Visit site and determine whether work can proceed without damage to findings; ○ Determine and demarcate exclusion boundary; ○ Site location and details to be added to the project’s Geographic Information System (GIS) for field confirmation by archaeologist; ○ Inspect site and confirm addition to project GIS; ○ Advise the National Heritage Council of Namibia (NHCN) and request written permission to remove findings from work area; and ○ Recovery, packaging and labelling of findings for transfer to National Museum. ● Should human remains be found, the following actions will be required: <ul style="list-style-type: none"> ○ Apply the chance find procedure as described above; ○ Schedule a field inspection with an archaeologist to confirm that remains are human; ○ Advise and liaise with the NHCN and Police; and ● Remains will be recovered and removed either to the National Museum or the National Forensic Laboratory.

Environmental Feature	Impact	Management Actions
Noise	Nuisance impacts	<ul style="list-style-type: none"> • Work hours should be restricted to between 08h00 and 17h00 where construction involving the use of heavy equipment, power tools and the movement of heavy vehicles is less than 500 m from residential areas. If an exception to this provision is required, all residents within the 500 m radius should be given 1 week's written notice.
Rehabilitation	Visual impact	<ul style="list-style-type: none"> • Upon completion of the construction phase consultations should be held with the local community/property owner(s) regarding the post-construction use of remaining excavated areas (if applicable). • In the event that no post-construction uses are requested, all excavated/degraded areas need to be rehabilitated as follows: <ul style="list-style-type: none"> ○ Excavated areas may only be backfilled with clean or inert fill. No material of hazardous nature (e.g. sand removed with an oil spill) may be dumped as backfill. ○ Rehabilitated excavated areas need to match the contours of the existing landscape. ○ The rehabilitated area should not be higher (or lower) than nearby drainage channels. This ensures the efficiency of revegetation and reduces the chances of potential erosion. ○ Topsoil is to be spread across excavated areas evenly. ○ Deep ripping of areas to be rehabilitated is required, not just simple scarification, so as to enable rip lines to hold water after heavy rainfall. • Ripping should be done along slopes, not up and down a slope, which could lead to enhanced erosion.

Environmental Feature	Impact	Management Actions
Topsoil	Loss of topsoil and associated opportunity costs	<ul style="list-style-type: none">• When excavations are carried out, topsoil¹ should be stockpiled in a demarcated area.• Stockpiled topsoil should be used to rehabilitate post-construction degraded areas and/or other nearby degraded areas if such an area is located a reasonable distance from the stockpile.
Aesthetics	Visual impact	<ul style="list-style-type: none">• Consider planting indigenous vegetation within the site to enhance the aesthetics of the site.• Do not introduce any alien vegetation on site.

¹ Topsoil is defined here as the top 150mm of surface material, which accounts for the seedbank.

3.4 Phase 4: Operational Phase Management Actions

The table below (Table 3-4) presents the management action for operational phase.

Table 3-4: Operational phase management actions

Environmental Feature	Impact	Management Actions
EMP Training	Lack of EMP awareness and the implications thereof	<ul style="list-style-type: none"> All contractors appointed for maintenance work on the respective streets and services infrastructure must ensure that all personnel are aware of necessary health, safety, and environmental considerations applicable to their respective work.
Water	Water usage	<ul style="list-style-type: none"> Promote water saving within the development.
Water	Surface and groundwater contamination	<ul style="list-style-type: none"> Ensure that surface run-off water accumulating on-site are channelled and captured through a proper storm water management system to be treated in an appropriate manner before disposal into the environment.
Aesthetics	Visual impacts	<p>The proponent should consult with a view to incorporate the relevant local/national/international development guidelines which addresses the following:</p> <ul style="list-style-type: none"> The incorporation of indigenous vegetation into the development. To mark the area with appropriate road warning signs (e.g. the road curves to the left/right)
Waste	Environmental Pollution	<ul style="list-style-type: none"> Waste is to be managed in accordance with the regulations of the Municipality of Walvis Bay which relates to waste management. The recycling of waste should be promoted amongst residents and business within the development.
Electricity	Energy management	<ul style="list-style-type: none"> Electricity is to be obtained from an approved electrical supplier such as ErongoRed to ensure efficiency of generation and use as well as sustainability of supply.
Noise	Noise impact	<ul style="list-style-type: none"> The proponent should consult with the view to incorporate the relevant local/national/international guidelines to manage the generation of traffic noise in the development area.

Environmental Feature	Impact	Management Actions
Groundwater	<p>Reduced soil infiltration</p> <p>Oil and fuel spills - soil contamination</p> <p>Sewer leakage-groundwater quality</p>	<ul style="list-style-type: none"> • Ensure the sewer system is monitored for leakages. • Routine visual inspections of sewer infrastructure and resident parking areas for signs of soil contamination. • Emergency fuel & oil spill kits should be available on-site during maintenance activities by contractors.

3.5 Recommendations for Monitoring

3.5.1 Groundwater monitoring

It is proposed that a monitoring programme be implemented to monitor both the water quality and quantity at the site. The monitoring programme is divided into two phases:

- Phase 1: Monitoring during any expansion and construction activities (temporary monitoring); and
- Phase 2: Permanent monitoring surrounding higher risk infrastructure (long term or for a period after the activity).

3.5.1.1 Phase 1 monitoring

It is proposed that during the construction phase (or any expansion activity at the site) monitoring focuses on active excavation and equipment / heavy machinery parking or housing areas. Regular visual inspections of these areas need to be undertaken. Moreover, placement and monitoring of drip trays underneath parked construction vehicles will help to determine which vehicles need to be repaired/taken off-site to prevent contamination while in service.

3.5.1.2 Phase 2 monitoring

For the generally proposed expansions, monitoring should focus on permanent sewer and stormwater infrastructure (i.e., hydraulic monitoring). Regular visual assessments of the infrastructure, parking and service areas should be adequate to monitor for obvious signs of pollution into the environment. For the cemetery it is proposed that dedicated groundwater boreholes be drilled to monitor potential contamination from the cemetery and to update the conceptual models developed for these sites (GCS Water and Environment, 2021).

3.5.2 EMP Compliance Monitoring

In order to prevent and minimize the above-mentioned environmental impacts, the following site monitoring measures need to be done:

- Monitor whether provisions as set out in the EMP has been complied with.
- Non-compliance is to be recorded and discussed at weekly site meetings and timeous remedial actions taken.
- Should complaints be received regarding specific non-compliance matters continued communication should be held with the aggrieved parties until the matters are clarified.

4 CONCLUSION

Based on the recommendation given in this EMP, GCS is confident that the proposed activities, as described in **Chapter 2** of the scoping report may be granted an Environmental Clearance Certificate, provided that the EMP is implemented and that all the legal requirements pertaining to this development are complied with.