

UPDATED EMP FOR OMAPALALA SAND MINING ECC: 02154

UPDATED ENVIRONMENTAL MANAGEMENT PLAN (EMP) FOR THE CONTINUATION OF SAND MINING ACTIVITIES FOR THE OMAPALALA VILLAGE, ONDONGA TRADITIONAL AUTHORITY, OSHIKOTO REGION

APP: 004652



Prepared by:



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Project Details

TITLE: UPDATED ENVIRONMENTAL MANAGEMENT PLAN (EMP) FOR THE CONTINUATION OF SAND MINING ACTIVITIES FOR THE OMAPALALA VILLAGE, ONDONGA TRADITIONAL AUTHORITY, OSHIKOTO REGION

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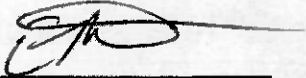
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DECLARATION

We hereby declare that:

- a. We have the knowledge of and experience in conducting assessments, including knowledge of the Acts, regulations, and guidelines that are relevant to the proposed exploration project.

- b. We have performed the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant.



Mr. Elia I.N. Mvula

Position: Environmental Assessment Practitioner (EAP)

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REPORT/DOCUMENT CONTROL FORM

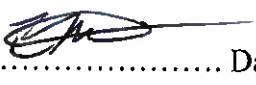


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ABBREVIATIONS AND ACRONYMS

EMP	Environmental Management Plan
CENC	Contractor Environmental Coordinator
DEAF	Department of Environmental Affairs and Forestry
EAs	Environmental Assessments
EC	Environmental Commissioner
ECC	Environmental Clearance Certificate
ECC	Environmental Clearance Certificate
EIA	Environmental Impact Assessment
EPL	Exclusive Prospecting License
I&APs	Interested and Affected Parties
MEFT	Ministry of Environment, Forestry and Tourism
PM	Project Manager
PP	Project Proponent

1. INTRODUCTION

1.1 BACKGROUND

Ondonga Traditional Authority (hereby referred to as the proponent in this document) currently carry out the sand mining activities in Omapalala village outside Oniipa Town boundaries. This site is environmentally cleared, the Environmental Clearance Certificate (ECC No 02154) was issued on 22 April 2022 and it is valid until 22 April 2025. Due to the demand for sand which is mainly used for making concrete, filling roads, building sites, brick-making, making glass sandpapers, and reclamations, the proponent would like to increase the size of the pit where they are currently doing sand mining.

In this respect the proponent has appointed Acacia Enviro Consulting cc to update the Environmental Management Plan to the Ministry of Environment, Forestry and Tourism (MEFT): Directorate of Environmental Affairs and Forestry (DEAF) for the intended development.

In terms of the Environmental Management Act (EMA) No.7 of 2007 and its 2012 EIA Regulations, the proposed project triggers listed activities that cannot be undertaken without an Environmental Clearance Certificate (ECC) as listed Activity 3.1

- *The construction of facilities for any process or activities which requires a license, right or other form of authorization, and the renewal of a license, right or other form of authorization, in terms of the Minerals (Prospecting and Mining Act), 1992,*
- *Listed Activity 3.2 Other forms of mining extraction of any natural resources whether regulated by law or not, and*
- *Listed Activity 3.3 Resource extraction, manipulation, conservation and related activities.’’*

1.2 PROJECT LOCATION

Omapalala village is situated in the Oshikoto region, approximately 4 km North of Oniipa town, accessible from the B3622 road (Onethindi – Oshigambo road). The site is located further 2 km off the B3622 road via a track road, in the Oshikoto region. **Figure 1** shows the accessibility map of the site, **Figure 2** shows the location of the old site and the new site (size increment for the proposed site).

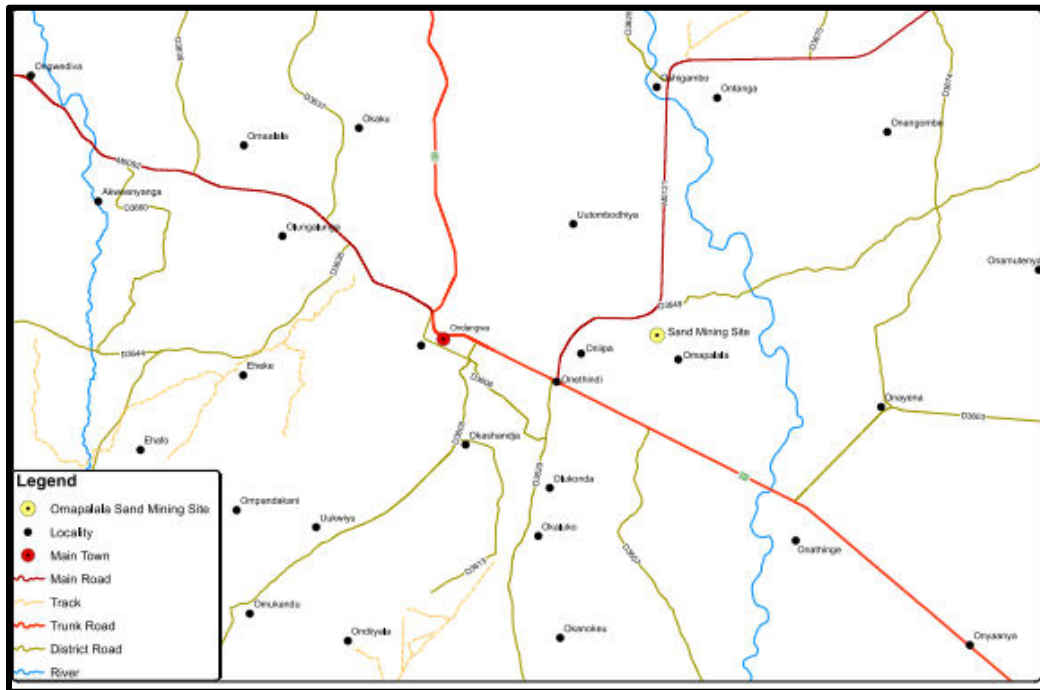


Figure 1: The accessibility of the site

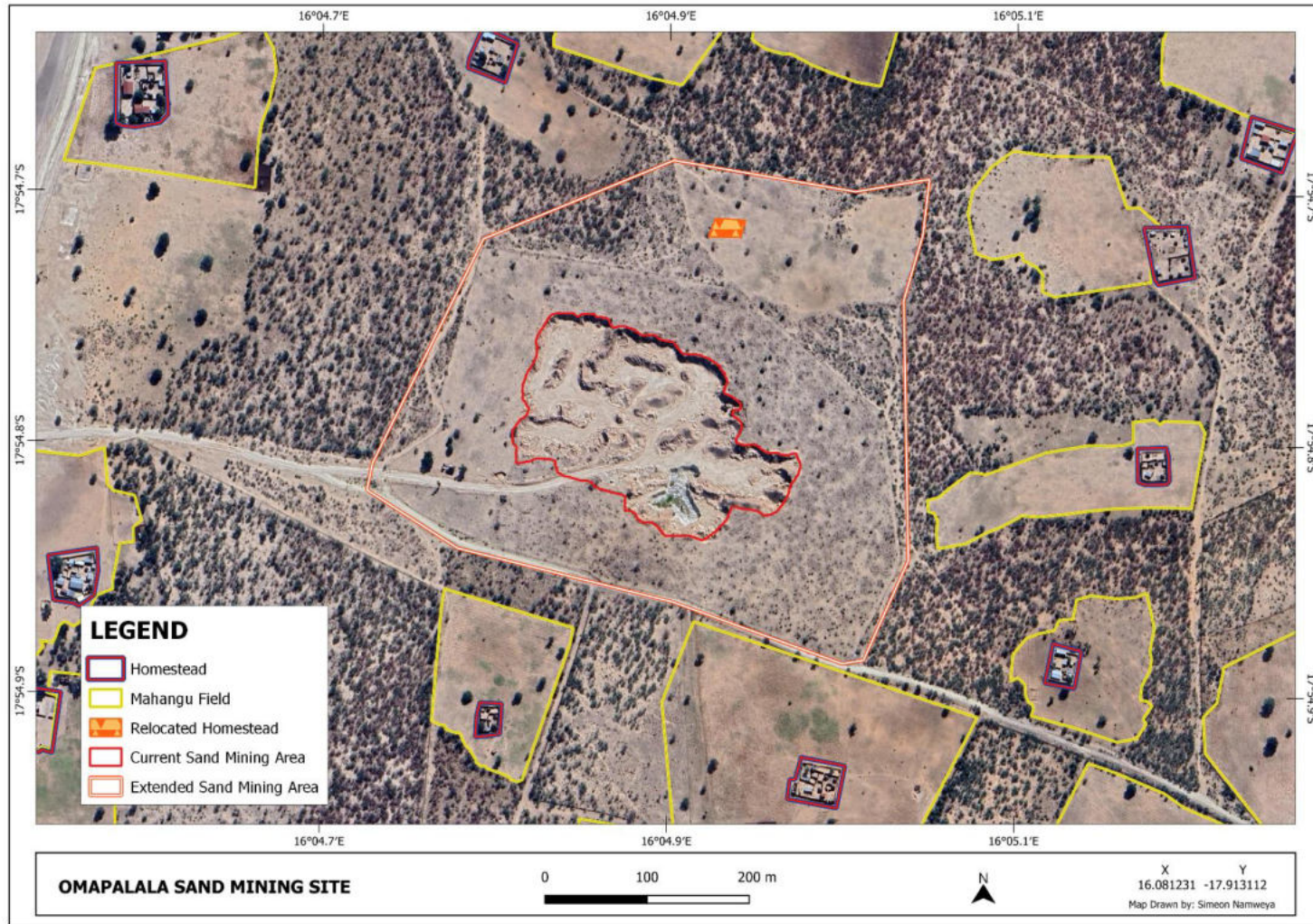


Figure 2 the locality map of the existing and the proposed sand mining site

1.3 WHAT IS AN EMP

An Environmental Management Plan (EMP) can be defined as “*an environmental management tool used to ensure that undue or reasonably avoidable adverse impacts of the construction, operation and decommissioning of a project are prevented; and that the positive benefits of the projects are enhanced*”. EMPs are therefore important tools for ensuring that the management actions arising from Environmental Impact Assessment (EIA) processes are clearly defined and implemented through all phases of the project life-cycle (Planning, operation, and decommissioning).

1.4 TERMS OF REFERENCE

The Environmental Scoping Assessment conducted by Acacia Enviro Consultant producing the EMP reports documenting the following:

- Identification of Policies, Legislation and Regulations relevant to the project;
- Identification of any mitigation actions to be taken to minimize predicted adverse impacts and provide associated costs where applicable and practical;
- Development of an environmental monitoring plan which will ensure that the mitigation measures are adhered to during the implementation phase;

1.5 OBJECTIVES OF THIS EMP

The Environmental Management Plan (EMP) provides a detailed plan of action required in the implementation of the mitigation measures for minimizing and maximizing the identified negative and positive impacts respectively. This EMP gives commitments including financial and human resources provisions for effective management of the likely environmental liabilities during and after the exploration. The specific objectives of this EMP are:

- Ensuring compliance with regulatory authority stipulations and guidelines;

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- To formulate measures that will mitigate the adverse impacts of the proposed project on various environmental components, which have been identified during the environmental impact assessment.
- To formulate measures to protect environmental resources where possible.
- To formulate measures to enhance the value of environmental components where possible.
- Responding to changes in project implementation not considered in the EIA;
- Responding to unforeseen events; and
- Providing feedback for continual improvement in environmental performance.

1.6 SCOPE OF THIS EMP

To achieve the above objectives, the scope of this EMP will include the followings:

- Definition of the environmental management objectives to be realized during the life of a project (i.e., Planning, Operation and/or decommissioning phases) in order to enhance benefits and minimize adverse environmental impacts.
- Description of the detailed actions needed to achieve these objectives, including how they will be achieved, by whom, by when, with what resources, with what monitoring/verification measures, and to what target or performance level.
- Clarification of institutional structures, roles, communication and reporting processes required as part of the implementation of the EMP.
- Description of requirements for record-keeping, reporting, review, auditing and updating of the EMP.

1.7 HIERARCHY OF MITIGATION MEASURES IMPLEMENTATION

This EMP has adopted a hierarchy of methods for mitigating significant adverse effects identified in order of preference and as follows:

- i. Enhancement, e.g., provision of new habitats;

- ii. Avoidance, e.g., sensitive design to avoid effects on ecological receptors;
- iii. Reduction, e.g., limitation of effects on receptors through design changes, and;
- iv. Compensation, e.g., community benefits

1.8 MITIGATION MEASURES IMPLEMENTATION

The EMP provides a detailed plan of action required in the implementation of the mitigation measures for minimizing and maximizing the identified negative and positive impacts respectively. The EMP also provides the management actions with roles and responsibilities requirements for the implementation of environmental management strategies by the proponent through the contractors and subcontractors who will be part and parcel of the proposed project

1.9 WHAT ARE THE LEGAL IMPLICATIONS AND OBLIGATIONS UNDER THIS PLAN?

The updated EMP will be sent to the Directorate of Environmental Affairs and Forestry (DEAF) of the Ministry of Environment, Forestry and Tourism (MEFT) for approval. Once the DEAF is satisfied with the contents of the updated EMP, they will issue an Environmental Clearance Certificate (ECC) to the Proponent to go ahead with the project .The ECC is linked with the recommendations of the Environmental Management Plan.

Once the ECC is issued, the EMP becomes a legally binding document and each role-player including contractors and sub-contractors is made responsible for implementing the relevant sections of the EMP and is required to abide by the conditions stipulated in this document.

2 POLICY, LEGAL AND ADMINISTRATIVE FRAMEWORK

An important part of the Environmental Assessment is identifying and reviewing the administrative, policy, and legislative situation concerning the proposed activity, to inform the proponent about the requirements to be fulfilled in undertaking the proposed activities. This section looks at the legislative framework within which the proposed development will operate.

The focus is on compliance with the legislation during the planning and operational phases. All relevant legislation, policies, and international statutes applicable to the project are highlighted in Table 2: Relevant legislation, policies, and international statutes applicable to the project below as specified in the Environmental Management Act, 2007 (Act No.7 of 2007) and the regulations for Environmental Impact Assessment as set out in the Schedule of Government Notice No. 30 (2012). Table 1 below shows an explanation is additionally provided regarding how these provisions apply to this project.

Legislation/Policy/Guideline	Relevant Provision	Implication for the Project and relevant officials to be conducted
Environmental Management Act (EMA) No. 7 of 2007	<p>The Act requires that projects with significant environmental impacts are subject to an environmental assessment process (Section 27).</p> <p>The Act details principles which are to guide all EAs.</p>	<p>The EMA and its regulations should inform and guide this EA process.</p> <p>Should the ECC be issued to the Proponent, it may be required by the MEFT to be renewed every 3 years, counting from the date of issue.</p>
Environmental Impact Assessment (EIA) Regulations Government Notice 28-30 (Government Gazette 4878))	<p>Details requirements for public consultation within a given environmental assessment process (Government Notice 30 Section 21).</p> <p>Details the requirements for what should be included in a Scoping Report (Government Notice 30 Section 8) and an Assessment Report (Government Notice 30 Section 15).</p>	<p>Contact details at the Department of Environmental Affairs and Forestry (DEAF), Ministry of Environment and Tourism (MET)</p> <p>Office of the Environmental Commissioner (Attention: Mr. Timoteus Mufeti)</p> <p>Tel: +264 (0) 61 284 2701</p>

Legislation/Policy/Guideline	Relevant Provision	Implication for the Project and relevant officials to be conducted
Public and Environmental Health Act (Act 1 of 2015)	Provide a framework for a structured uniform public and environmental health system in Namibia; and to provide for incidental matters.	Section 77 (cx) elaborates on the need for keeping of clean environment and free from health nuisance so as not to endanger the public health;
Pollution Control and Waste Management Bill of 1999	Prevent and regulate discharge of pollutants in the air, water and land; regulate noise, dust and odour pollution; establish a system of waste planning and management	All disturbance, effluent and pollution resulting from the charcoal sorting and packing activities will be required to be in strict accordance with the regulations outlined in the Pollution Control and Waste Management Bill.
Forestry Act (Act No. 12 of 2001)	The Act provides for the management and use of forests and forest products. Section 22. (1) provides: “Unless otherwise authorised by this Act, or by a licence issued under subsection (3), no person shall on any land which is not part of a surveyed erven of a local authority area as defined in section 1 of the Local	The proponent will apply for the relevant permit under this Act if it becomes necessary. Contacting the Directorate of Forestry Onankali Forestry Office Telephone : <u>065 248 980</u>

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Legislation/Policy/Guideline	Relevant Provision	Implication for the Project and relevant officials to be conducted
	<p>Authorities Act, 1992 (Act No. 23 of 1992) cut, destroy or remove - (a) vegetation which is on a sand dune or drifting sand or on a gully unless the cutting, destruction or removal is done for the purpose of stabilising the sand or gully; or (b) any living tree, bush or shrub growing within 100 m of a river, stream or watercourse.”</p>	
<p>Labour Act 11 of 2007 Health and Safety Regulations (HSR) GN 156/1997 (GG 1617).</p>	<p>Adhere to all applicable provisions of the Labour Act and the Health and Safety regulations</p>	<p>Division of Labour Services at the Ministry of Labour, Industrial Relations and Employment Creation. Tel: +264 61 206 6111</p>
<p>Water Act 54 of 1956</p>	<ul style="list-style-type: none"> The Water Resources Management Act 11 of 2013 is presently without regulations; therefore, the Water Act No. 54 of 1956 is still in force: 	<p>The protection (both quality and quantity) of water resources should be a priority.</p>

Legislation/Policy/Guideline	Relevant Provision	Implication for the Project and relevant officials to be conducted
	<ul style="list-style-type: none"> • Prohibits the pollution of water and implements the principle that a person disposing of effluent or waste has a duty of care to prevent pollution (S3 (k)). • Provides for control and protection of groundwater (S66 (1), (d (ii)). <p>Liability of clean-up costs after closure/abandonment of an activity (S3 (l)).</p>	
Soil Conservation Act (Act 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 to soil conservation and management measures must be complied with.

Legislation/Policy/Guideline	Relevant Provision	Implication for the Project and relevant officials to be conducted
<p>The Road Traffic and Transport Act No. 52 of 1999 and its 2001 Regulations</p>	<p>Provides for the control of traffic on public road and the regulations pertaining to road transport, including the licensing of vehicles and drivers.</p>	<p>(Roads Authority- specialist Road legislation), Tel: +264 (0) 61 284 7072</p>
<p>The National Heritage Act (No. 27 of 2004): Regulated under the Ministry of Education, Arts and Culture through National Heritage Council (NHC) of Namibia and The National Monuments Act (No. 28 of 1969): Regulated under the NHC</p>	<p>The Act provides provisions for the protection and conservation of places and objects of national heritage significance, and to register to places and objects under that framework. The project will ensure that should any archaeological objects defined in the Act found while mining operations, it will be communicated to the custodian ministry immediately</p>	<p>Any material of archeological, cultural or heritage importance should be reported to the National Heritage Council as per the requirements of this Act. Contact: Mrs. Erica Ndalikokule (Director) Tel: 061 301 903</p>

3 DRAFT EMP IMPLEMENTATION, ROLES & RESPONSIBILITIES

As the project Proponent, Ondonga Traditional Authority is responsible for the implementation of the EMP, however, the proponent can delegate this responsibility at any time, as they deem necessary during the operation of the facility. The roles and responsibilities of all the parties involved in the effective implementation of this EMP are as follows:

Table 1 the roles and responsibility during operation

ROLE	ENVIRONMENTAL RESPONSIBILITIES
The proponent (Ondonga Traditional Authority)	Responsible to enforce EMP implementation during the operation
The Department of Environmental Affairs	<ul style="list-style-type: none"> • Review the EMP and makes the decision either to approve not to approve the ECC application • Approve any amendments to the EMP. • Approve reports of environmental issues and non-conformances as issued. • Review the environmental audits submitted to their office
Site foreman / Manager	<ul style="list-style-type: none"> • Control and monitor actions required by the EMP. • Ensure documented procedures are followed and records kept on site. • Ensure any complaints are passed onto the management within 24 hours of receiving the complaint. • Ensure that all the workers are putting on their PPE and adhere to the rules and regulation • Ensure materials being used on site are environmental friendly and safe.

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ROLE	ENVIRONMENTAL RESPONSIBILITIES
General workers	<ul style="list-style-type: none">• Follow requirements as directed by site technical manager.• Report any potential environmental issues to site technical officer

4 ENVIRONMENTAL MANAGEMENT & MITIGATION ACTION PLANS

The environmental management and mitigations measures (management action plan) provided to the potential adverse impacts associated with the proposed operation and its activities are presented under this section. The aim of this management action plan is to avoid these potential impacts where possible, and where impacts cannot be avoided, measures are provided to reduce the significance of the impacts.

4.1 Key potential Negative/ (Adverse) Impacts

The summary of key identified potential adverse impacts for which the measures have been developed are as follows:

- Potential air and noise pollution from the machinery.
- Potential occupational health and safety risks associated with mishandling of operational equipment.
- Environmental (waste generation) pollution from improper disposal of waste.

4.2 The Management and Mitigation of Potential Key Negative Impacts

The management and mitigation measures (action plans) for the potential negative impacts for the operational and maintenance phase are presented in **Table 3**. The required management and mitigation plan actions have been presented together with key responsible person(s), resources and the timeline of such actions. These aspects form the headings of Table 3,

Impact	Management & Mitigation Measure(s)	Responsible Person	Resources	Timeline
Lack of EMP awareness and	-EMP training should be provided to all new	-Proponent	-Independent Environmental	

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Impact	Management & Mitigation Measure(s)	Responsible Person	Resources	Timeline
implications thereof	<p>workers on site as part of introductory induction.</p> <p>-All site personnel should be aware of necessary health, safety, and environmental considerations applicable to their respective work</p> <p>-The implementation of this EMP should be monitored.</p> <p>-The site should be inspected regularly, and a compliance audit done throughout the life of the operational facility as recommended below:</p> <ul style="list-style-type: none"> ○ Daily – by in-house site manager /foreman 	<p>-site manager /foreman</p> <p>-External Environmental Consultant</p>	<p>Consultant: EMP compliance and auditing</p> <p>-DEAF: site inspections for compliance</p> <p>-Identification of all persons involved in the implementation of the EMP</p> <p>-Compliance Monitoring reports</p> <p>-Timely renewal of ECC as required.</p> <p>-Records of EMP training conducted</p>	<p>Throughout the Operation phase</p>

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Impact	Management & Mitigation Measure(s)	Responsible Person	Resources	Timeline
	<ul style="list-style-type: none"> ○ Bi-annually – by an external environmental compliance auditor 			
Lack of Permits/ Licenses	<p>-All the required agreements and licenses or permits required for operations to occur should be applied for and obtained</p> <p>The permits, agreements referred to herein include:</p> <ul style="list-style-type: none"> ○ Environmental Clearance Certificate (ECC) ○ 	-Proponent	-Record of permits and authorizations obtained	Before Operation commences on the extension site
Lack of communication (proper liaison) between surrounding land users	-The Proponent should have someone (the site foreman/manager) to liaise with neighboring land users (property	-Proponent -The site manager / foreman	-Grievance logbook -Local land users/ communities	throughout the operation phase

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Impact	Management & Mitigation Measure(s)	Responsible Person	Resources	Timeline
(communities) and Proponent	<p>owners), when needed and required.</p> <p>-A clear communication procedure/plan which should include a grievance mechanism should be compiled to.</p>			
Creation of employment opportunities	<p>-Priority for any non-skilled labour should be given to people from around the respective site, in accordance with procedures approved by the relevant authorities.</p> <p>-Equal opportunity should be provided for both men and women.</p>	-Site Manager	<p>-Record of employees</p> <p>-Constituency Council office may assist in identifying required unemployed workers for jobs requiring no skills.</p> <p>-Notification via the Constituency Office</p>	Pre-operation activities and throughout the operation phase

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Impact	Management & Mitigation Measure(s)	Responsible Person	Resources	Timeline
Site soils (land) disturbance	<p>-All possible trenches excavated for sand mining should be rehabilitated/backfilled.</p> <p>-Soils that are not within the intended footprints of the site areas should be left undisturbed.</p> <p>-Avoid disposal or spillage of any type of waste (hazardous, non-hazardous, fuels etc.) on the ground</p> <p>-In an event that any of the substances mentioned above, spill on the soil, the contaminated soil should be cleaned up immediately and dispose of in designated hazardous waste bins and then to</p>	<p>-site manager</p> <p>-Proponent</p>	<p>-Backfilling equipment</p> <p>Adequate disposal site for contaminated soils</p>	<p>Throughout the operation phase</p>

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Impact	Management & Mitigation Measure(s)	Responsible Person	Resources	Timeline
	an approved landfill site.			
Air quality (dust, flue gas emissions)	<p>-Dust masks, eye protective glasses and other respiratory personal protective equipment (PPE) such as face masks should be provided to the workers carrying out potential dust/smoke generating activities, where they are exposed to smoke or dust.</p> <p>--Vehicles should only be driven at the authorized site speed of 40km per hour to avoid dust generation.</p> <p>-The heavy vehicles and fumes generating equipment (during site maintenance) should not be left idling when not in use.</p>	<p>-Proponent</p> <p>-Site manager / foreman</p> <p>-Site Manager / foreman</p> <p>General workers</p>	-Grievance logbook	Throughout the Operation phase

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Impact	Management & Mitigation Measure(s)	Responsible Person	Resources	Timeline
Environmental pollution	<p>-Any hazardous waste that may have an impact on the physical and social environment should be handled cautiously and disposed of carefully at the nearest approved waste management facilities of the Town.</p> <p>-Workers should be sensitized to dispose of waste in a responsible manner and not litter.</p>	<p>-Proponent -Site Manager</p>	<p>-Waste storage containers</p>	<p>Throughout the operation phase</p>
General health and safety associated with project activities	<p>-The Labour Act's Health and Safety Regulations should be complied with.</p> <p>-Establish an emergency rescue system for the evacuation of staff in case of an emergency.</p>	<p>-Proponent -Site Manager</p>	<p>-Health and Safety Policies/plan</p>	<p>throughout the facility operation</p>

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Impact	Management & Mitigation Measure(s)	Responsible Person	Resources	Timeline
	<p>-As part of their induction, the project workers should be provided with an awareness training of the risks of mishandling equipment and material on site as well as health and safety risk associated with their respective jobs.</p> <p>-Workers should not be allowed to consume alcohol or any other intoxicants prior to and during working hours as this may lead to mishandling of equipment which results in injuries and other health and safety risks.</p> <p>-The site to be equipped with "danger" or "cautionary" signs for</p>			

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Impact	Management & Mitigation Measure(s)	Responsible Person	Resources	Timeline
	any potential danger or risk area identified.			
Noise generation	<p>-Noise from operations' vehicles and equipment on the sites should be at acceptable levels.</p> <p>-The mining and maintenance activities should only be carried between 8am in the morning and 5pm.</p> <p>-Site workers and contractors should be equipped with PPE such as earplugs to reduce exposure to excessive noise during noisy site operations.</p>	<p>-Site manager</p> <p>-Proponent</p>	Time sheet	Throughout the project operation
Accidental disturbance of archaeological or heritage objects	The site upgrading and maintenance contractor should be sensitized to exercise and recognize Heritage	<p>Site Manager</p> <p>-general workers</p>	Preservation of all artefacts and objects that are discovered on and around the	Throughtout the operation phase

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Impact	Management & Mitigation Measure(s)	Responsible Person	Resources	Timeline
	<p>“Chance Finds Procedure (CFP)”</p> <ul style="list-style-type: none"> - Appendix B. - Adhere to the provisions of Section 55 of the National Heritage Act in event significant heritage and culture features are discovered while conducting site works. -When the removing topsoil and subsoil on the site for site upgrade works, the site should be monitored for subsurface archaeological materials 		<p>project site during earthworks</p>	

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Impact	Management & Mitigation Measure(s)	Responsible Person	Resources	Timeline
Loss Fauna and Flora	<p>-Avoid the illegal harvesting of site vegetation and collection of firewood onsite.</p> <p>-The poaching of wild animals on and around the site is strictly prohibited.</p> <p>-Limit the site working areas to open land, thus preventing the disturbance of site vegetation.</p> <p>-Avoid leaving equipment or machinery leaning on vegetation.</p>	<p>Site Manager</p> <p>-general workers</p>	<p>Awareness to the workers</p> <p>Inspection report</p>	<p>Throughout the operation</p>
site security and safety	<p>The site fence should be fenced off and maintained.</p>	<p>-Proponent</p> <p>-Site Manager</p> <p>-general workers</p>	<p>Community orientation and awareness</p>	<p>Throughout the operation</p>

5.MONITORING EMP

Monitoring of the EMP performance for the proposed project by the Contractor emphasizes early dictation, reporting, and corrective action. It is divided into three parts, namely:

- Monitoring of project activities and actions to be undertaken by the Environmental Coordinator (ENC) appointed by the Contractor.
- The Environmental Coordinator (ENC) shall report all incidents and situations which have the potential of jeopardizing compliance of statutory provisions as well as provisions of this EMP to the Project Proponent.
- The Environmental Coordinator (ENC) shall take corrective prompt measures, adequate and long-lasting in addressing non-compliance activities or behavior.

To ensure compliance of the Contractor ENC to the implementation of the EMP, it is highly recommended that an External Environmental Expert is appointed by the proponent to ensure the implementation of the EMP. The tables (3 - 9) provided below are to be used for monitoring purposes by the Contractor’s ENC.

Table 2: Solid waste disposal

Mitigation	Compliance	Follow up Action Required	By Whom	When	Date Completed
Are disposal drums/bins available or full?					
Is there any litter around the site and its surroundings?					

Table 3: Oil spillage or used oil

Mitigation	Compliance	Follow up Action Required	By Whom	When	Date Completed
Are disposal drums available or full?					
Are there any oil spills around the site and its surroundings?					

Table 4: Land and Soil Disturbance

Mitigation	Compliance	Follow up Action Required	By Whom	When	Date Completed
Are there any deviations from the provisions of the EMP on land and soil disturbance?					
Are car track barricades in place?					

Table 5: Dust generation on-site and gravel roads stretch

Mitigation	Compliance	Follow up Action Required	By Whom	When	Date Completed
Are there any deviations from the provisions of the EMP on dust pollution?					
Are the fume and particulate levels acceptable?					

Table 6: Biodiversity (fauna and flora)

Mitigation	Compliance	Follow up Action Required	By Whom	When	Date Completed
Are there any deviations from the provisions of the EMP on biodiversity?					
It is traipsing harvesting plants taking place feeding of animals or introduction of animals?					

Table 7: Noise emission on-site

Mitigation	Compliance	Follow up Action Required	By Whom	When	Date Completed
Are there any deviations from the provisions of the EMP on noise and vibration on-site?					
Are there any complaints from the surroundings neighbour about noise emanating from the sites or tracks transporting materials/produce?					

Table 8: Compliance

Mitigation	Compliance	Follow up Action Required	By Whom	When	Date Completed
Are there any deviations from the provisions of the EMP on noise and vibration on-site?					
Are there any complaints from the surroundings neighbour about noise emanating from the sites or tracks transporting materials/produce?					

6.ENVIRONMENTAL CODE OF CONDUCT

The Code of Conduct outlined in this section of the EMP applies and is not limited to, subcontractors, visitors, permanent and temporary workers. Therefore, anybody who finds him or herself within the boundaries of the proponent must adhere to the Environmental Code of Conduct as outlined in this section of the EMP.

- The Contractor ENC will implement on-site environmental guidelines and has the authority to issue warnings as well as discipline any person who transgresses environmental rules and procedures. Persistent transgression of environmental rules will result in a disciplinary hearing and thereafter continued noncompliance behaviour will result in permanent removal from the sites.

Natural environment management guidelines

- a. Never feed, tease or play with, hunt, kill, destroy or set devices to trap any wild animal (including birds, reptiles and mammals), livestock or pets. Do not bring any wild animal or pet to the sites;
- b. Do not pick any plant or take any animal out of the mining area EVER. You will be prosecuted and asked to leave the project area;
- c. Never leave rubbish and food scraps or bones where it will attract animals, birds or insects. Rubbish must be thrown into the correct rubbish bins or bags provided;
- d. Protect the surface material by not driving over it unnecessarily;
- e. Do not drive over, build upon, or camp on any sensitive habitats for plants and animals;
- f. Do not cut down any part of living trees/bushes for firewood;
- g. Do not destroy bird nest, dens, burrow pits, termite hills, etc. or any other natural objects in the area.

Vehicle use and access guidance

- i. Never drive any vehicle without a valid license for that particular vehicle and do not drive any vehicle that appears not to be road-worthy;
- ii. Never drive any vehicle when under the influence of alcohol or drugs;
- iii. DO NOT make any new roads without permission. Stay within demarcated areas;

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- iv. Avoid U-Turns and large turning circles. 3-point turns are encouraged. Do not ever drive on rocky slopes;
- v. Stay on the road, do not make a second set of tracks and do not cut corners;
- vi. DO NOT SPEED - 30 km per hour for normal vehicles and 20km per hour for heavy trucks on gravel roads and around the site;
- vii. No off-road driving is allowed;
- viii. Vehicles may only drive on demarcated roads;
- ix. Adhere to speed limits and drive with headlights switched on along any gravel road.

Control of dust guidance

- a. Do not make new roads or clear any vegetation unless instructed to do so by your Contractor or the Environmental Coordinator or Site Manager;
- b. Do not try to disturb the surface of the natural landscape as little as possible.
- c. Do not speed on gravel roads and around the sites, and adhere to the speed limits.
- d. Apply water to suppress dust were the generation of the dust on either gravel roads

Health and safety guidance

- a. Drink lots of water every day, but only from the freshwater supplies;
- b. Take the necessary precautions to avoid contracting the HIV/AIDS virus;
- c. Never enter any area that is out of bounds, or demarcated as dangerous or wander off without informing or permission of team leader;
- d. Never climb over any fence or trespass on private property without permission of the landowner or consultation with the Environmental Coordinator, Site Manager.
- e. Wear protective clothing and equipment required and according to instructions from your Contractor or Site Manager;
- f. Don not engages in sexual relations with minors and also adheres to zero tolerance to spread HIV/AIDS.

Preventing pollution and dangerous working conditions guidance

- I. Never throw any hazardous substance such as fuel, oil, solvents, etc. into streams or onto the ground;
- II. Never allow any hazardous substance to soak into the soil;

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- III. Immediately tell your Contractor or Environmental Coordinator when you spill or notice any spillage of hazardous substance anywhere in the field or camp;
- IV. Report to your Contractor or Environmental Coordinator when you notice any container, which may hold a hazardous substance, overflow, leak or drip;
- V. Immediately report to your Contractor or Environmental Coordinator when you notice overflowing problems or unhygienic conditions at the ablution facilities, vehicles, equipment and machinery, containers, and other surfaces.

Disposal of solid and liquid waste guidance

- a. Learn to know the difference between the two main types of waste, namely: General Waste; and Hazardous Waste.
- b. Learn how to identify the containers, bins, drums, or bags for the different types of waste. Never dispose of hazardous waste in the bins or skips intended for general waste.
- c. Never burn or bury any waste on the camp or in the field;
- d. Never overfill any waste container, drum, bin, or bag. Inform your Contractor or the Environmental Coordinator/ Site Manager if the containers, drums, bins, or skips are nearly full;
- e. Never litter or throw away any waste on the site, in the field, or along any road.
- f. No illegal dumping;
- g. Littering is prohibited.

Dealing with environmental complaints guidance

- a. If you have any complaint about dangerous working conditions or potential pollution to the environment, immediately report this to the Environmental Coordinator
- b. If any person complains to you about noise, lights, littering, pollution, or any other harmful or dangerous condition, immediately report this to your Contractor.

Environmental Personnel Register

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Table 24 presents the Environmental Personnel Register to be signed by every person who receives or attends the Environmental Awareness Training who has the training material explained to him or her or in possession of the training material.

Table 9: Environmental Personnel Register

Date	Name	Company	Signature

7. SITE CLOSURE AND REHABILITATION

Based on the proposed project plan, the life of the project is considered to be indefinite, and as such no closure or rehabilitation phase was considered. During the decommissioning phase of the project, the following recommendations should be considered:

- The site fencing should be maintained to ensure the security of the site at least until decommissioning is completed. The fencing can then be dismantled once all decommissioning activities are completed and the site is safe for human and animals to roam around.
- All access roads that may have been created for the phase and no longer required for operational phase should be closed off.
- Various stakeholders should be engaged as early as possible in the closure planning to ensure that their inputs are considered.
- All associated infrastructures must be removed
- Planting of natural vegetation on site.
- Notify staff about the planned decommissioning and provide them with references to pursue work somewhere else.

APPENDIX 1: CHANCE FINDS PROCEDURE (AFTER KINAHAN, 2020)

Areas of proposed development activity are subject to heritage survey and assessment at the planning stage. These surveys are based on surface indications alone, and it is, therefore, possible that sites or items of heritage significance will be found during development work. The procedure set out here covers the reporting and management of such findings.

Scope: The “*chance finds*” procedure covers the actions to be taken from the discovery of a heritage site or item to its investigation and assessment by a trained archaeologist or other appropriately qualified person.

Compliance: The “chance finds” procedure is intended to ensure compliance with relevant provisions of the National Heritage Act (27 of 2004), especially Section 55 (4): “*A person who discovers any archaeological objectmust as soon as practicable report the discovery to the Council*”. The procedure of reporting set out below must be observed so that heritage remains reported to the NHC are correctly identified in the field.

The manager/Supervisor must report the finding to the following competent authorities:

- National Heritage Council of Namibia (061 244 375)
- National Museum (061 276800),
- National Forensic Laboratory (061 240461).

Archaeological material must NOT be touched. Tempering with the materials is an offence under the heritage act and punishable upon conviction by the law.

Responsibility:

Operator: To exercise due caution if archaeological remains are found

Foreman: To secure site and advise management timeously

Superintendent: To determine safe working boundary and request inspection

Archaeologist: To inspect, identify, advise management, and recover remains

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Procedure:

Action by person identifying archaeological or heritage material: 29

- a) If operating machinery or equipment stop work
- b) Identify the site with flag tape
- c) Determine GPS position if possible
- d) Report findings to foreman

Action by foreman:

- a) Report findings, site location, and actions taken to the superintendent
- b) Cease any works in the immediate vicinity.

Action by the superintendent:

- a) Visit the site and determine whether work can proceed without damage to the findings.
- b) Determine and mark exclusion boundary.
- c) Site location and details to be added to project GIS for field confirmation by archaeologist.

Action by Archaeologist:

- a) Inspect site and confirm the addition to project GIS.
- b) Advise NHC and request written permission to remove findings from the work area.
- c) Recovery, packaging and labeling of findings for transfer to the National Museum.

In the event of discovering human remains:

- a) Actions as above
- b) Field inspection by archaeologist to confirm that remains are human
- c) Advise and liaise with NHC and Police
- d) Recovery of remains and removal to National Museum or National Forensic Laboratory, as directed.

APPENDIX 2: MINUTES FOR OMAPALALA COMMUNITY MEETING



P. O. Box 70, Ondangwa

ondongatauthority@gmail.com

Tel/Fax: 065 245 834

Minutes for the Community meeting in Omapalala village in regards to the extension of the Borrow Pit

Date: 31 August 2024
Place: Omapalala village
Time: 09h00

A prayer was conducted by Kk Katrina Nangombe

1. Attendance

Please refer to the attached attendance list

2. Introduction

Remarks were made, by Mr Joseph Mvula, the headman of the Omapalala Village, who welcomed everyone that was present and appreciated their efforts to attend the meeting.

3. Election of members of the village Management Committee

The village headman advised the villagers to use the opportunity to elect members of the village Management Committee. The following members were nominated and seconded:

1. Tk Thomas Kasita
2. Tk Edward Malapi
3. Tk Sackeus Emmanuel
4. Tk Petrus Lyakwata
5. Mm Linea Uugwanga
6. Mm Sofia Ikela
7. Mm Hendrina Amakali

4. Ondonga Traditional Authority laws and regulations

The headman, Mr Mvula, also used the opportunity (while waiting for Mr Munguli and Mr Nambundunga to arrive) to go through some of the laws and regulations made by the Ondonga Traditional Authority and stressed that they should be adhered to or implemented accordingly. Some questions regarding customary laws were also raised and answered.

5. Sand mining issues

Mr Petrus Munguli who serves as a Community Police with Mr Nambundunga and attended on behalf of the OTA {Ondonga Traditional Authority} tool the floor made elaborations on the benefits and principles that are in place for the control and management of the borrow pit. He explained about the rehabilitation of the old borrow pit and the application for extension therefore.

The completion of gravel road and the fencing of the borrow pit will continue as well as the excavation of the community water dam for harvesting.

The community demands the immediate completion of the community earth dam within the village, with the purpose of water harvesting during the coming rainy season for animals and human consumption. They also demand that a fishing pond be established in the village, with the assistance of the Traditional Authority.

Thus, the benefits put in place for the management of the borrow pit includes fishing ponds for the community through aquaculture, employment creation especially for the youth. The community will also be free to take building sand from the borrow pit at no cost. Bricks project and electricity transformer were amongst the proposed projects by the community of Omapalala village.

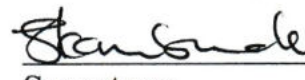
6. Recommendations and Conclusion

The majority of the villagers indicated their satisfaction and recommendation for the extension of the sand mining borrow pit.

The headman made closing remarks, a prayer and the meeting was adjourned.


 Chairperson
 Mr Joseph Mvula




 Secretary
 Ms Josephina Kambonde

Edhina

Nangodhi

1. Josefina Kamukonde 0814222751
2. Josef Mvula
3. Sam Katangola 0812978264
4. Simon Lindongo 0813042495
5. Jesaya Sakaria 0816753748
6. France Fillemo 0813059194
7. Loide Thomas 0817190107
8. Simson Thomas 0812532434
9. Katrina Nangombe 0812972469
10. Kuku Hilma Fillemo 081
11. Thomas Kasita 0812182314
12. Martha Ithindi 0813468050
13. Shiyanga Frieda 0812319040
14. Rebecca Ithindi 0816434849
15. Helena Shilemba 0812321759
16. Mysaan Mvula 0812358094
17. Festus Iiyamba 0812842580
18. Mwandangi Matias 0812852838
19. Sakeus Immanuel 0813113505
20. Iiyamba Frieda 0816574881
21. Selma Mvula 0818129099
22. Nangombe Stefanus 0814139528
23. Ruben Shikongo 0813367321
24. Elizabeth Shimi 0812014005
25. Agustinus Agustinus 08175918027
26. James Sakaria 0816744587
27. Kleopas Amunyela 0812488536
28. Titana Joel 0812333486
29. Nambahu Johannes 0813201873

MWENE GWOMUKUNDA
OMAPALALA
JOSEPH MVULA

3 AUG 2024

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OSHIKANDJO - OMULONDO
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Edhina

30. Ngyhiendaka Mateus
31. Fillemon Gebhard
32. Vistorina Gottib
33. Tuule Malapi
34. Anna Nefungo
35. Josepina Malima
36. Miiana Johannes
37. Anna Magano Fillemon
38. Tuuliki Shikongo
39. Diina Ngenohaame
40. Jonas Kleopas
41. Italiana Anjeline
42. Angola Martha
43. Maria Eliazel
44. Festus Titana
45. Feni Amwaanyena
46. Tiyambo Monica
47. Leena Simeon
48. Loide Andreas
49. Mbangi Maria
50. Yoolkeni Abraham
51. Petrina Kivula
52. Tafet Sofia
53. Maria Nepando
54. Petrina Amushila
55. Miiana Nangolo
56. Amutenya Selma
57. Amukwata Louisa
58. Selma Nembungu
59. Magdalena Shipanga

Ungodhi

- 081 3214609
- 081 3846250
- 081 2391499
- 081
- 081 7608001
- 081 2701800
- 081 8767520
- 081 4235127
- 081 8082390
- 081 6297507
- 081 3627200
- 081 3614656
- 081 3360653
- 081 4380969
- 081 8121320
- 081 2966300
- 081 7836157
- 081 3188242
- 081 3059194
- 081 3328419
- 081 2751127
- 081 3339578
- 081 3867714
- 081 4135192
- 081 3271037
- 081 6160649
- 081 2268712
- 081 3258308
- 081 6469729

60. Selma Angula	081 4554 209
61. Aune mbango	081 3193022
62. Festus Kalola	081 4024424
63. Esther Ester Augustinus	081 715144
64. Andreas Anjelinu	081 2860426
65. Amakali Johannes	081 7226502
66. Njala Filippus	081 2177950
67. Nikanoi Mbango	081 2005270
68. Titana Johannes Enkali	085 7973989
69. Saara Nangolo	081 6861633
70. Sartiel Shifotoka	081 2323402
71. Sartiel Nakanyala	081 2586044
72. Festus Andreas	081 4032946
73. Joseph Nambahu	081 3455977
74. Uva Shilumbu	081 4100432
75. ElRebeth Kalola	081 2000346

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