

**ENVIRONMENTAL ASSESSMENT
FOR
THE REZONING OF ERF Re/8161 FROM
GOVERNMENT TO INDUSTRIAL IN WINDHOEK,
KHOMAS REGION NAMIBIA**

APPLICATION NO.: 221214000699

**FINAL ENVIRONMENTAL IMPACT
SCOPING REPORT**

APRIL 2023



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PROJECT DETAILS

TITLE: Environmental Assessment for the Rezoning of Erf Re/8161 from Government to Industrial in Windhoek, Khomas Region, Namibia

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LIST OF ACRONYMS

AIDS	Acquired Immune Deficiency Syndrome
CRR	Comments and Response Report
dB	Decibels
DEISR	Draft Environmental Impact Scoping Report
EA	Environmental Assessment
EISR	Environmental Impact Scoping Report
ECC	Environmental Clearance Certificate
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
EMA	Environmental Management Act
EMP	Environmental Management Plan
FEISR	Final Environmental Impact Scoping Report
GTZ	Gesellschaft für Technische Zusammenarbeit
HIV	Human Immunodeficiency Virus
I&AP	Interested and Affected Party
IUCN	International Union for Conservation of Nature
MEFT	Ministry of Environment Forestry and Tourism
MEFT: DEA	Ministry of Environment Forestry & Tourism: Department of Environmental Affairs
NEC	Namibia Environmental Consultants
NPC	National Planning Commission
PPP	Public Participation Process
SADC	Southern African Development Community
USAID	United States Agency for International Development

1 INTRODUCTION

The purpose of this chapter is to describe the context of the EIA and the scope of work undertaken. It also outlines how this EIA complies with the requirements set by the legislative context of Namibia, as well as being guided by the principles of impact assessment best practice.

1.1 PROJECT BACKGROUND

Namibia Post and Telecommunication Holdings Ltd (NPTH) (*herein referred to as the proponent*) is of the intention to rezone Erf Re/8161 from “Government to Industrial” and measures approximately 3.8 Ha in extent. Erf Re/8161 is currently zoned for “Government” use or purpose as per the town planning scheme for the Municipality of Windhoek. The need and desirability for the rezoning of the premises emanated from the fact that the current zoning only accommodates government related operations. This makes it difficult for the tenants and/or operators at the premises to obtain clearance certificates from the municipality for their respective business operations. The tenants on the premises are involved in different types of industrial and commercial activities that do not align with the current zoning.

In terms of the Town Planning Scheme for the City of Windhoek, any change in land use needs to be advertised as per the scheme regulations and consent is to be asked from the adjoining neighbours and from the Municipality as well as other interested and affected parties should have the opportunity to raise concerns or questions as per the Environmental Management Act and Regulations.

Under the ambit of the Environmental Management Act No 7 of 2007, rezoning exercises are subject to an Environmental Impact scoping Assessment exercise. The extent of the environmental impacts to be realized by any rezoning or subdivision can only be determined once the final decision with regards to the use of the property is made.

The above activity will be discussed in more detail in Chapter 4. Namibia Post and Telecommunication Holdings Ltd (NPTH) appointed Namibia Environmental Consultants (NEC) to undertake the Environmental Assessment (EA) in order to obtain an Environmental Clearance Certificate (ECC) for the above activity in Windhoek. The competent authority is the Ministry of Environment Forestry and Tourism: Department of Environmental Affairs (MEFT: DEA).

The process will be undertaken in terms of the gazette Namibian Government Notice No. 30 Environmental Impact Assessment Regulations (*herein referred to as EIA Regulations*) in terms of Environmental Management Act (No 7 of 2007) (*herein referred to as the EMA*). The EIA process will investigate if there are any potential significant bio-physical and socio-economic negative impacts associated with the proposed development and associated infrastructure and services. The EIA process would also serve to provide an opportunity for the public and key stakeholders to provide comments and participate in the process. Lastly, based on specific nature of the affected environment, specialist input will also be sourced as and when required.

1.2 NEED AND DESIRABILITY

The primary objective of this project is to rezone Erf Re/8161 from “Government to Industrial”. The need and desirability for the rezoning of the premises emanated from the fact that the current zoning only accommodates government related operations and/or activities. This makes it difficult for the tenants and/or operators at the premises to obtain clearance certificates from the municipality for their respective business operations.

1.3 PROJECT LOCATION

Windhoek is the capital city of Namibia located in the central area of the country in the Khomas highlands with an estimated population of 460 000 inhabitants. The capital city is situated in Khomas Region. The existing site - Erf Re/8161 for Namibia Post & Telecommunications Holdings Ltd (NPTH) is located within the southern industrial, Lazarette Street area opposite the M&Z garage. ***Refer to figure 1 for the locality map below.***

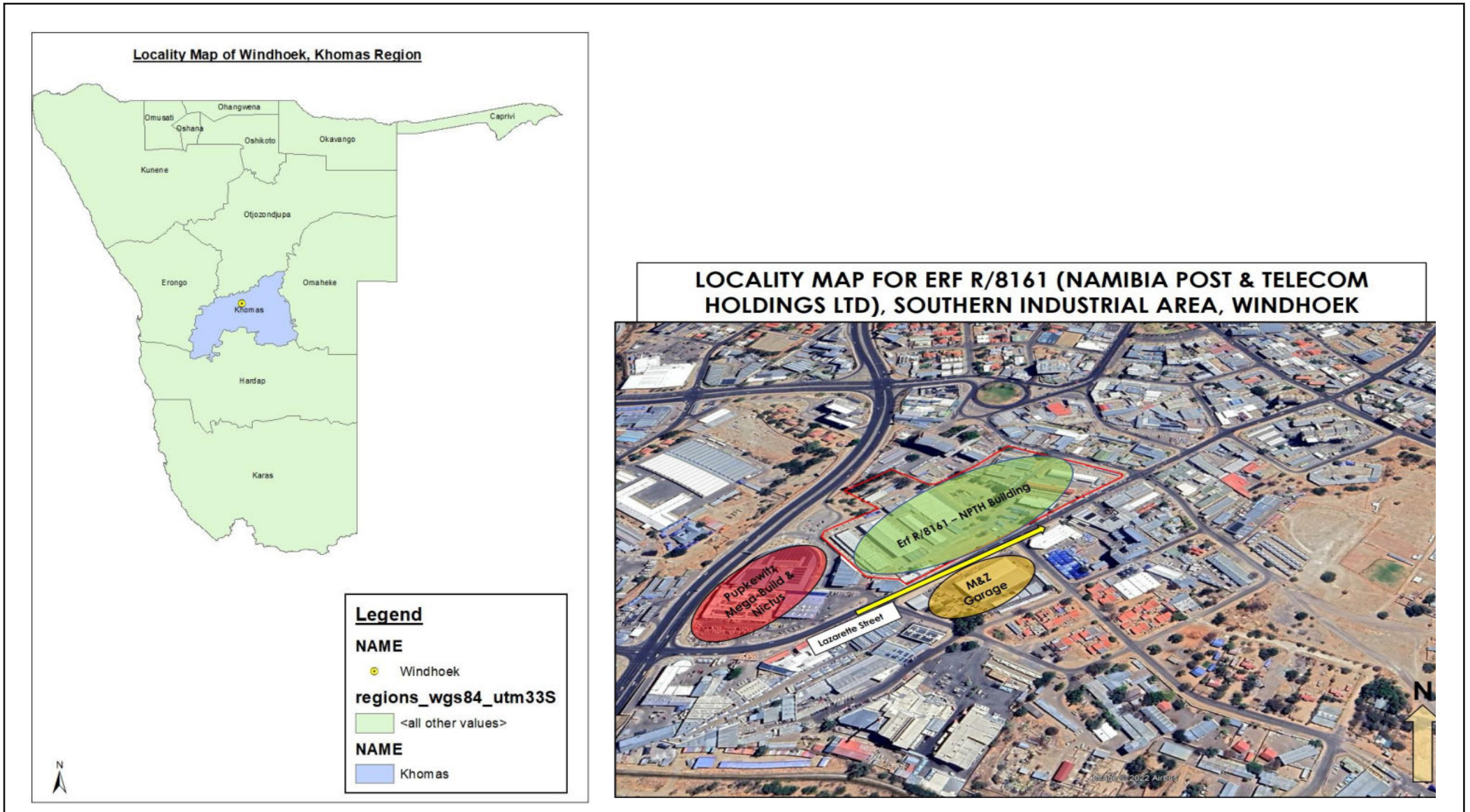


Figure 1: Locality map of Erf Re/8161 (NPTH), Southern Industrial Area, Windhoek

1.4 TERMS OF REFERENCE AND SCOPE OF PROJECT

The scope of this project is limited to obtaining an Environmental Clearance Certificate for the rezoning of Erf Re/8161 from “Government to Industrial” as per the Environmental Regulations and the Town Planning Scheme for the Municipality of Windhoek and it does not extend to any other activity that is not part of this project.

The Final Environmental Impact Scoping Report (FEISR) comprises the following information:

- An overview of the legal requirements which necessitated the assessment, as well as a review of other current or pending legal requirements that have a bearing on the activity;
- A description of the proposed project, including need and desirability, and the proposed activities that form the subject of the EIA process;

A detailed description of the bio-physical and socio-economic environment;

- A description of the possible bio-physical and socio-economic impacts that have been identified to date, i.e. during the Project Initiation and EA Phase, and the means whereby such impacts will be subjected to their significance, mitigation potential and possible acceptance are concerned;
- A detailed description of the Public Participation Process (PPP) that underpins the current EIA process;
- A description of aspects and the assessment thereof;
- Impact assessment and mitigation measures proposed by the environmental consultant and
- A final Environmental Management Plan (EMP), which would include the recommended mitigation measures required to reduce the significance of impacts identified in the EIA process.

1.5 ASSUMPTIONS AND LIMITATIONS

In undertaking this investigation and compiling the Environmental Impact Scoping (EIS), the following assumptions and limitations apply:

- Assumes the information provided by the proponent is accurate and discloses all information available.
- It is assumed that information obtained from the proponent regarding the engineering services of the project is accurate.
- The limitation that no existing Engineering Services Report for the current operations was available during the compilation of this environmental impact scoping report. The existing services at the premises or site of Erf Re/8161 are adequate enough to cater for the existing activities in operation and they are already linked to the existing network of the municipality.

1.6 CONTENT OF ENVIRONMENTAL IMPACT SCOPING REPORT

Section 8 of the gazetted EIA Regulations requires specific content to be addressed in a Scoping / Environmental Assessment Report. **Table 1** below is an extract from EMA and highlights the required contents of the Environmental Impact Scoping Report whilst assisting the reader to find the relevant section in the report.

Table 1: Contents of the Scoping / Environmental Assessment Report

Section	Description	Section of FEISR/ Annexure
8 (a)	<i>The curriculum vitae of the EAP who prepared the report;</i>	Refer to Annexure G
8 (b)	<i>A description of the proposed activity;</i>	Refer to Chapter 4
8 (c)	<i>A description of the site on which the activity is to be undertaken and the location of the activity on the site;</i>	Refer to Chapter 1
8 (d)	<i>A description of the environment that may be affected by the proposed activity and the manner in which the geographical, physical, biological, social, economic and cultural aspects of the environment may be affected by the proposed listed activity;</i>	Refer to Chapter 3
8 (e)	<i>An identification of laws and guidelines that have been considered in the preparation of the scoping report;</i>	Refer to Chapter 2
8 (f)	<i>Details of the public consultation process conducted in terms of regulation 7(1) in connection with the application, including</i>	Refer to Chapter 6
	<i>The steps that were taken to notify potentially interested and affected parties of the proposed application</i>	Refer to Chapter 6
	<i>Proof that notice boards, and notices notifying potentially interested and affected parties of the proposed application have been displayed, placed or given;</i>	Refer to Annexures B for site notices respectively.
	<i>A list of all persons, organisations and organs of state that were registered in terms of regulation 22 as interested and affected parties in relation to the application;</i>	Refer to Annexure D
	<i>A summary of the issues raised by interested and affected parties, the date of receipt of and the response of the EAP to those issues;</i>	Refer to Annexure D
8 (g)	<i>A description of the need and desirability of the proposed listed activity and any identified alternatives to the proposed activity that are feasible and reasonable, including the advantages and disadvantages that the proposed activity or alternatives have on the environment and on the community that may be affected by the activity;</i>	Refer to Chapter 5
8 (h)	<i>A description and assessment of the significance of any significant effects, including cumulative effects, that may occur as a result of the undertaking of the activity or identified alternatives or as a result of any construction, erection or decommissioning associated with the undertaking of the proposed listed activity;</i>	Refer to Chapter 7 & 8
8 (i)	<i>Terms of Reference for the detailed assessment;</i>	N/A – Assessment of impacts are included in this EIS Report
8 (j)	<i>A Final Environmental Management Plan</i>	Refer to Annexure A

2 LEGAL ENVIRONMENTAL FRAMEWORK

This chapter provides an overview of the legislation and policy framework for the EIA being undertaken. The EIA will be undertaken in compliance with the relevant Namibian environmental legislation as well as taking into account international best practice for impact assessments.

2.1 THE CONSTITUTION OF THE REPUBLIC OF NAMIBIA

There are two clauses contained in the Namibian Constitution that are of particular relevance to sound environmental management practice, viz. articles 91(c) and 95(l). In summary, these refer to:

- Guarding against over-utilisation of biological natural resources;
- Limiting over-exploitation of non-renewable resources;
- Ensuring ecosystem functionality;
- Protecting Namibia's sense of place and character;
- Maintaining biological diversity; and
- Pursuing sustainable natural resource use.

The above therefore commits the State to actively promote and sustain environmental welfare of the nation by formulating and institutionalising policies to accomplish the abovementioned sustainable development objectives.

2.2 NAMIBIA'S ENVIRONMENTAL MANAGEMENT ACT (EMA)

In giving effect to articles 91(c) and 95(l) of the Constitution of Namibia, general principles for sound management of the environment and natural resources in an integrated manner have been formulated. This resulted in Namibia's Environmental Assessment Policy of 1994. To give statutory effect to this Policy, the Environmental Management Act was approved in 2007, and gazetted on 27 December 2007 as the Environmental Management Act (Act No. 7 of 2007) (EMA), Government Gazette No. 3966. Part 1 of the Environmental Management Act describes the various rights and obligations that pertain to citizens and the Government alike, including an environment that does not pose threats to human health, proper protection of the environment, broadened *locus standi* on the part of individuals and communities, and reasonable access to information regarding the state of the environment. Part 2 of the Act sets out 13 principles of environmental management, as follows:

- Renewable resources shall be utilised on a sustainable basis for the benefit of current and future generations of Namibians.
- Community involvement in natural resource management and sharing in the resulting benefits shall be promoted and facilitated.
- Public participation in decisions affecting the environment shall be promoted.
- Fair and equitable access to natural resources shall be promoted.
- Equitable access to sufficient water of acceptable quality and adequate sanitation shall be promoted and the water needs of ecological systems shall be fulfilled to ensure the sustainability of such systems.
- The precautionary principle and the strategy of preventative action shall be applied.

- There shall be prior environmental assessment of projects and proposals which may significantly affect the environment or use of natural resources.
- Sustainable development shall be promoted in land-use planning.
- Namibia's movable and immovable cultural and natural heritage, including its biodiversity, shall be protected and respected for the benefit of current and future generations.
- Generators of waste and polluting substances shall adopt the best practicable environmental option to reduce such generation at source.
- The polluter pays principle shall be applied.
- Reduction, reuse and recycling of waste shall be promoted.
- There shall be no importation of waste into Namibia.
- Promotion of the coordinated and integrated management of the environment;
- The Minister of Environment, Forestry and Tourism was enabled to give effect to Namibia's obligations under international environmental conventions;
- Certain institutions were established to provide for a Sustainable Development Commission and Environmental Commissioner".

As the organ of state responsible for management and protection of its natural resources, the MEFT: DEA is committed to pursuing these principles of environmental management.

2.2.1 EIA Regulations GN 28, 29, and 30 of EMA promulgated on 6 February 2012

The gazette EIA Regulations promulgated in terms of the EMA, identify certain activities, which could have a substantially detrimental effect on the environment. These listed activities require an ECC from the competent environmental authority, i.e. MEFT: DEA, prior to commencing. The following activities identified in the EIA Regulations (**Table 2**) apply to the proposed project:

Table 2: List of triggered activities identified in the EIA Regulations which apply to the proposed project

Activity description and No(s):	Description of relevant Activity	The portion of the development as per the project description that relates to the applicable listed activity
Activity 5.1 Land Use and Development Activities	The rezoning of land from light industrial to heavy industrial use	The project area (premises) has existing activities on site that are in full operation.

This EIA process will be undertaken in accordance with the EIA Regulations. A Flow Diagram (refer to **Figure 2** below) provides an outline of the EIA process to be followed.

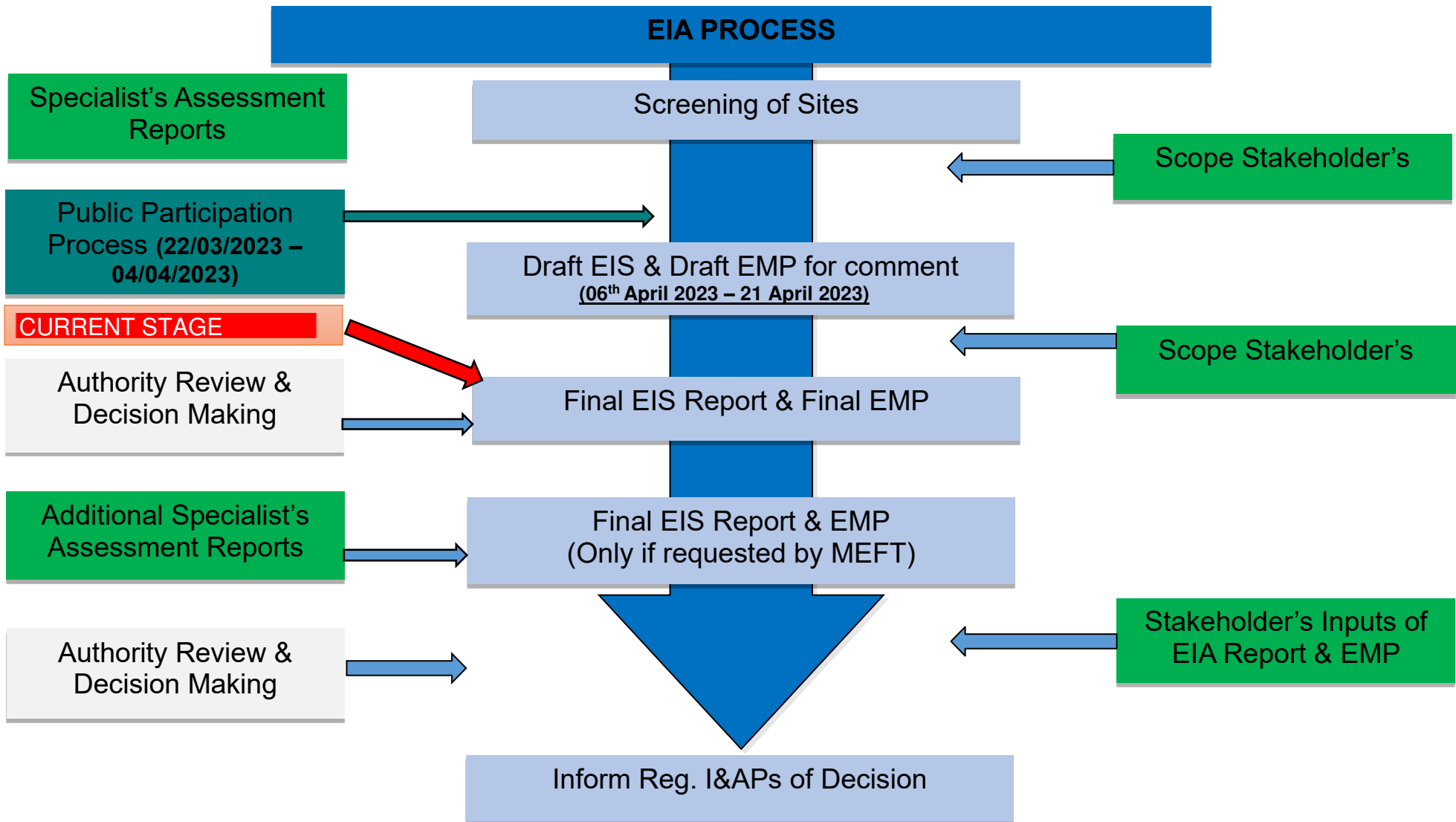


Figure 2: EIA Flow Diagram

2.3 ENVIRONMENTAL GUIDELINES

The EMA, under section 5, states that if a proposal is likely to affect people, the following guidelines should be considered in Scoping / EA:

- The location of the development in relation to interested and affected parties (I&APS), communities or individuals;
- The number of people likely to be involved;
- The reliance of such people on the resources likely to be affected, the resources, time and expertise available for scoping / EA;
- The level of education and literacy of parties to be consulted;
- The socio-economic status of affected communities;
- The level of organisation of affected communities;
- The degree of homogeneity of the public involved;
- History of any previous conflict or lack of consultation;
- Social, cultural or traditional norms within the community; and
- The preferred language used within the community.

The MEFT also released a Draft Procedures and Guidelines for conducting EIAs and compiling EMPs in April 2008. These guidelines outline the procedures and principles that are to be followed. It will be consulted throughout the EIA process to ensure an effective process and an EMP that addresses all identified impacts.

2.4 NAMIBIA VISION 2030

The principles that underpin Vision 2030, a policy framework for Namibia's long-term national development, comprise the following:

- Good governance;
- Partnership;
- Capacity enhancement;
- Comparative advantage;
- Sustainable development;
- Economic growth;
- National sovereignty and human integrity;
- Environment; and
- Peace and security.

Vision 2030 states that natural environments are disappearing quickly. Consequently, the solitude, silence and natural beauty that many areas in Namibia provide are becoming sought after commodities and must be regarded as valuable natural assets. Vision 2030 emphasises the importance of promoting Healthy Living which includes that the majority of Namibians are provided with basic services. The importance of developing Wealth, Livelihood and the Economy is also emphasised by Vision 2030.

2.5 BIODIVERSITY LEGISLATION AND POLICIES

The following policies, aimed at biodiversity, may also be relevant for the proposed project:

- Namibian Water Corporation Act (1997)
- Pollution and Waste Management Bill (Draft)
- Water Resources Management Act (2004)

The applicability of the aforementioned policies and legislation has been explored in further detail during this EIA phase, based on the findings of the impact assessment and specialist investigations.

2.6 ATMOSPHERIC POLLUTION PREVENTION ORDINANCE (ACT NO.11 OF 1976)

This Ordinance serves to control air pollution from point sources, but it does not consider ambient air quality. Any person carrying out a 'scheduled process' which are processes resulting in noxious or offensive gases typically pertaining to point source emissions have to obtain a registration certificate from the Department of Health.

Although we do not anticipate the development to generate noxious or offensive gasses, the proponent will ensure that a registration certificate (air pollution permit) is obtained, if required. As duty of care, the proponent should implement the necessary mitigation measures set out in order to limit emissions to air in the form of dust during construction and operation. Emissions could occur during the event of a fire or explosion and then risk mitigation and management measures should be in place.

2.7 WATER ACT NO.54 OF 1956

This Act provides for Constitutional demands including pollution prevention, ecological and resource conservation and sustainable utilisation. In terms of this Act, all water resources are the property of the State and the EIA process is used as a fundamental management tool.

A water resource includes a watercourse, surface water, estuary or aquifer, and, where relevant, its bed and banks. A watercourse means a river or spring; a natural channel in which water flows regularly or intermittently; a wetland lake or dam, into which or from which water flows; and any collection of water that the Minister may declare to be a watercourse. Permits are required in terms of the Act for undertaking the following activity relevant to the proposed project:

- Disposal of waste in a manner that may detrimentally impact on a water resource in terms of Section 21 (g).

2.8 WATER RESOURCES MANAGEMENT ACT OF NAMIBIA (2004)

This Act repealed the existing South African Water Act No.54 of 1956 which was used by Namibia. This Act ensures that Namibia's water resources are managed, developed, protected, conserved and used in ways which are consistent with fundamental principles depicted in section 3 of this Act. Part IX regulates the control and protection of groundwater resources. Part XI, titled Water Pollution Control, regulates discharge of effluent by permit. Thus, the tenants on the premises are required to efficiently plan for sewage disposal.

2.9 POLLUTION CONTROL AND WASTE MANAGEMENT BILL (IN PREPARATION)

This Bill serves to regulate and prevent the discharge of pollutants to air and water as well as providing for general waste management. The Bill will repeal the Atmospheric Pollution Prevention Ordinance (11 of 1976) (below) when it comes into force.

Only Parts 2 and 7 of the Bill applies to the proposed rezoning exercise of Erf Re/8161 in Windhoek.

Part 2 stipulates that no person shall discharge or cause to be discharged any pollutant to the air from a process except under and in accordance with the provisions of an air pollution licence issued under section 23. It further provides for procedures to be followed in licence application, fees to be paid and required terms of conditions for air pollution licences.

Part 7 states that any person who sells, stores, transports or uses any hazardous substances or products containing hazardous substances shall notify the competent authority, in accordance with sub-section (2), of the presence and quantity of those substances.

In terms of water pollution, it will be illegal to discharge of, or dispose of, pollutants into any watercourse without a Water Pollution Licence (apart from certain accepted discharges). Similarly, an Air Quality Licence will be required for any pollution discharged to air above a certain threshold.

The Bill also provides for noise, dust or odour control that may be considered a nuisance. The Bill advocates for duty of care with respect to waste management affecting humans and the environment and calls for a waste management licence for any activity relating to waste or hazardous waste management.

This bill aims to promote sustainable development and to prevent and regulate the discharge of pollutants into the environment. Once this bill is enacted it will make provision for the establishment of an appropriate framework for integrated pollution prevention and control.

The proposed development would not entail the discharge to air and or water.

2.10 PUBLIC HEALTH ACT 36 OF 1919 AND SUBSEQUENT AMENDMENTS

The Act, with emphasis to Section 119 prohibits the presence of nuisance on any land occupied. The term nuisance for the purpose of this EIA is specifically relevant specified, where relevant in Section 122 as follows:

- Any area of land kept or permitted to remain in such a state as to be offensive, or liable to cause any infectious, communicable or preventable disease or injury or danger to health; or
- Any other condition whatever which is offensive, injurious or dangerous to health.

Potential impacts associated with the proposed rezoning exercise for Erf Re/8161 in Windhoek are expected to include nuisance impacts.

2.11 URBAN AND REGIONAL PLANNING ACT 5 OF 2018

The Urban and Regional Planning Act aims to consolidate the laws concerning urban and regional planning and also make provision for the principles and standards of spatial planning. The Act further makes provision for the preparation, approval, review and amendment of zoning schemes, the establishment of townships as well as the subdivision and consolidation of land. Furthermore, a section of the Act institutes the establishment of the Urban and Regional Planning Board which administers the implementation and objectives of the Act.

2.12 MUNICIPALITY OF WINDHOEK TOWN PLANNING SCHEME 1997

The purpose of the Town Planning Scheme is to ensure the co-ordinated and harmonious development of the area of Windhoek in such a way as it will most effectively tend to promote

health, safety, order, amenity, convenience and general welfare as well as efficiency and economy and conservation of the existing character of the town.

The Municipality of Windhoek's Town Planning Scheme provides a guideline as to what developments will be acceptable within the boundaries of the town and as it relates to the restrictions placed on the specific property to be developed based on the zoning status of the land in question.

In terms of the Town Planning Scheme a change in land use must be advertised, a notice must be placed on site and on the notice board of the Municipality and letters are to be written to adjacent neighbours for their comments. If there are no comments or objections the application is submitted to the Municipality of Windhoek for approval where after the amendment is included in a Town Planning Amendment Scheme. In terms of the Town Planning Scheme, there are certain regulations pertaining to zoned erf in terms of land uses that may be permitted as well as building lines and height restrictions that must be adhered to. Any land uses not permitted under the table 3 of the Town Planning Scheme at the specific zone will require a new rezoning application.

2.13 LOCAL AUTHORITIES ACT 23 OF 1992

The Local Authorities Act prescribes the manner in which a town or municipality should be operated by the Town or Municipal Council. In this case the Local Authorities Act section 50 prescribes certain regulations pertaining to the closure of public open spaces and streets where such a closure must be advertised for comments/ objections.

As per the local Authorities Act, the closure of public open spaces must be advertised, a notice must be placed on site and neighbours need to provide consent.

3 ENVIRONMENTAL BASELINE DESCRIPTION

This chapter provides an overview of the environmental and biophysical characteristics of the affected area, and further provides a detailed description of the characteristics pertaining to the socio-economic and bio-physical environment.

3.1 SOCIAL ENVIRONMENT

3.1.1 Socio-Economic Context

According to the 2011 Census, the total population enumerated in Khomas Region is estimated at 342,141. Of these, 172,469 are females and 169,672 are males. Approximately 95% of the total population is located in urban parts and 5% in rural parts of the region. The total population of Windhoek to be specific is 431,000. (NPC, 2011).

In Khomas Region the population under 5 years of age is 11%. The population ranging from the age of 5 to 14 years of age comprise 16% of the region's population. The working age population, 15 to 59 years, makes up 69% of the whole population in the region. A relatively low percentage, 4% of the population, was above 60 years of age. For every 100 females in Khomas Region there are 98 males.

In Khomas Region the literacy rate of the age group 15 years and up, is 97%. 5% of all people above the age of 15 have never attended school, 19% are currently attending school and 73% left school at the time, in Khomas Region.

The main languages spoken at home in Khomas Region are Oshiwambo language at 41%, Afrikaans at 19%, Nama/Damara at 12% and Otjiherero at 10%. Approximately 74% of the population aged 15 years and up belong to the labour force (i.e., economically active) in Khomas Region. 70% of the population is employed while 30% are unemployed. The inactive group, which consists of homemakers, 8%, students 69% and the severely disabled, retired or old age income recipients 15% makes up of the regions' population.

The main source of income in this region is from wages and salaries at 73%, business and non-farming activities at 14% and Cash remittance at 5%. Farming makes up 1% respectively. The older age group makes up 4% of the region's income.

3.1.2 Archaeological and Heritage Context

It is highly unlikely that the site will have any momentous archaeological resources or features due to the fact that no major historical activity took place within close proximity of the site. However, an accidental find procedure may be required in the EMP.

No known heritage sites are however located within the proposed development area. If any heritage or cultural significant artefacts are found during the construction phase of the proposed project, construction must stop and the National Heritage Council of Namibia should be immediately notified.

3.2 BIO-PHYSICAL ENVIRONMENT

3.2.1 Climate

Windhoek is characterized by a sub-tropical-arid climate (a local steppe climate). The climate in the city is classified as BSh by the Köppen-Geiger system. The average maximum temperature as indicated in figure 3 below varies between 20 and 30°C with the average minimum temperature between 6 and 19°C.

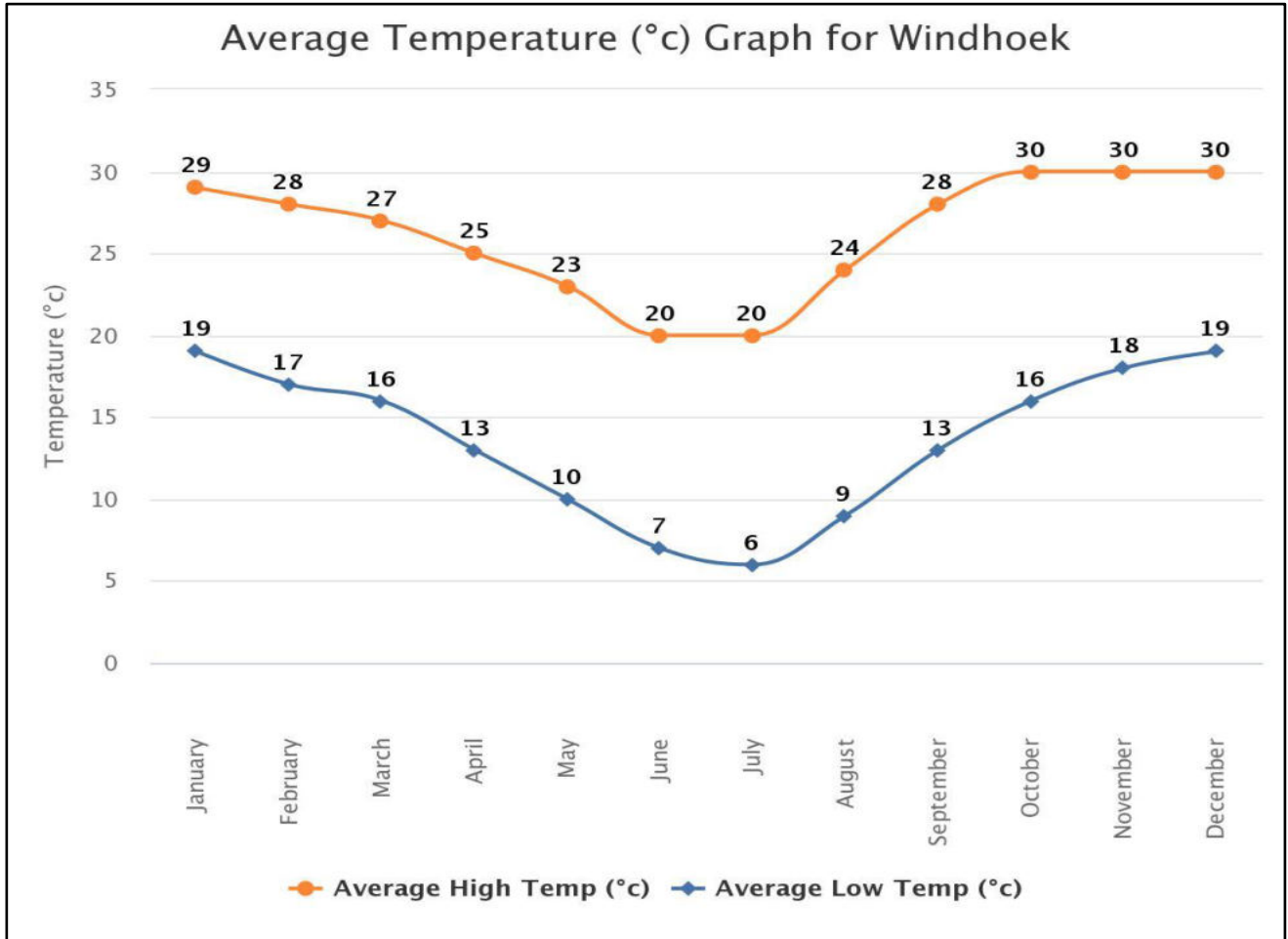


Figure 3: Average monthly temperature for Windhoek (*WorldWeatheronline@, 2023*)

In Windhoek, there is not much rainfall throughout the year. Rainfall is usually expected during the summer months as indicated in figure 4 below and on average 80% of this rainfall is experienced from September to May. Windhoek receives an annual precipitation of 534 mm. No rain of any significance falls from May to September, and the chance of rain increases progressively from October until February, the month with the highest total on average, and then decreases again until May.

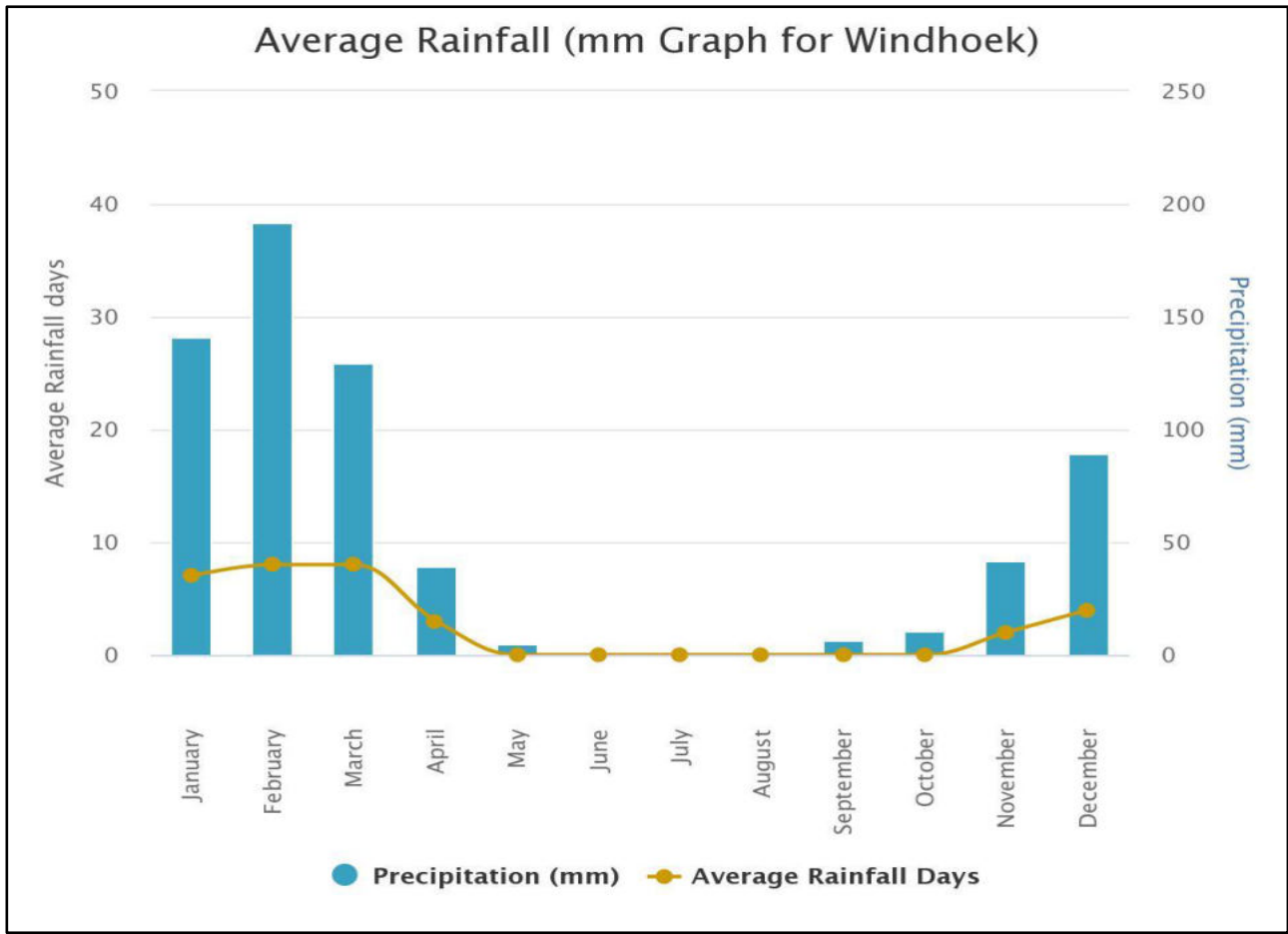


Figure 4: Average monthly rainfall for Windhoek (WorldWeatheronline®, 2023)

3.2.2 Surrounding Land Use

The project area is currently fully utilized with existing activities that are in operation and it belongs to the Namibia Post & Telecommunication Holdings (NPTH) Ltd. The site is currently zoned for Government (reserved and to utilised for Government purposes) and it is located within the southern industrial area. The general biophysical conditions of the site are predominantly free of sensitive flora and fauna given the built-up environment in which it is located. The surrounding land use in close proximity is characterized by industrial and business erven.

3.2.3 Terrestrial Ecology (Flora and Fauna)

The project area (Erf Re/8161) is situated within a built-up environment of industrial activities and/or zonings. The site is fully utilized with existing activities that are in operation. There are however a few big trees on the premises and these trees have been kept and maintained as part of the layout design for the premises. Below are some of the images for the site.



Figure 5: Vegetation found on site

4 PROJECT DESCRIPTION

The purpose of this chapter is to provide a detailed description of the project components. In addition, a description of reasonable and feasible alternatives is also provided.

4.1 PROJECT COMPONENTS

Namibia Post and Telecommunication Holdings Ltd (NPTH) (*herein referred to as the proponent*) is of the intention to rezone Erf Re/8161 from “Government to Industrial”. Erf Re/8161 measures approximately 3.8 Ha in extent in which the whole premises fully utilized with different activities. The need and desirability for the rezoning of the premises emanated from the fact that the current zoning only accommodates government related operations. This makes it difficult for the tenants and/or operators at the premises to obtain clearance certificates from the municipality for their respective business operations.

The tenants on the premises are involved in different types of industrial and commercial activities that do not align with the current zoning. The list of the operators or tenants operating on the premises can be viewed in **Annexure D**.

Erf Re/8161 is currently zoned for “Government” use or purpose as per the town planning scheme for the Municipality of Windhoek. The layout design or description for Erf Re/8161 can be viewed on the attached **Annexure F**. Table 3 below highlights the erection and use of buildings and land as per the designated zone or land use.

Table 3: Erection and use of buildings and use of land

Zone	Primary Use (purposes for which land may be used)	Special consent (purposes for which land may be used and buildings may be erected and used with the special consent of the Council only)	Prohibited Uses
Government	Offices	Dwelling units, Residential buildings, Institutions, Places of public worship, Business buildings, hotels, Restaurant	Other uses not under columns 2 and 3
Industrial & Commercial	Industrial buildings and business buildings	All other uses	No noxious industrial buildings may be erected, no noxious activities may be undertaken and no hazardous substances may be stored in quantities exceeding 200 litres, saving for a quantity of 1000 litres of fuel, specifically and only to cater for on-site standby generator installations, on land located South of the Southern edges of Academia, Windhoek, Olympia and Klein Windhoek Townships.

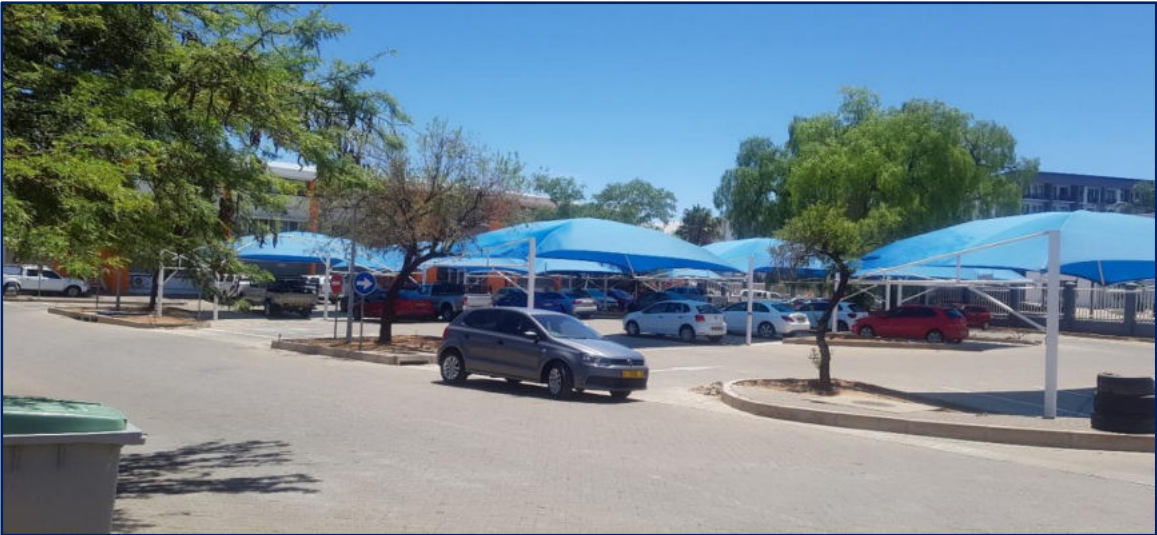


Figure 6: Building No. 1 (Central Procurement Board of Namibia (CPBN) Offices and Parking Bay)



Figure 7: Building No. 3 (PowerCom Offices and Parking Bay)



Figure 8: Warehouse No. 1 (Engineering, Motor Garage and Repairs)



MTC Warehouse & Shisha Shine Car Wash

Figure 9: Warehouse No. 2 (MTC warehouse and Shisha Shine Car Wash)



Figure 10: Warehouse No. 3 (CPBN storage space, Gunz-Upholstery, Generator Room, Quintech Trading, PowerCom storage space)



Figure 11: Warehouse No. 4 (Sousa MMA Studio – Gym and Offices)



Figure 12: Cafeteria

Cafeteria



Figure 13: Open Land (Future Tenants)

4.1.1 Engineering Services of Erf Re/8161

The premises is located within an industrial area and has been in existence and utilized for business operations and/or activities in which all engineering services (water, access roads, sewer and electricity) are installed. Therefore, there are no additional engineering required for this rezoning exercise.

Access Roads:

Access to the premises will still be obtained from the Lazarette street in southern industrial area.

Refuse Removal:

The City of Windhoek (Municipality) already caters for refuse removal in the city and has capacity to continue with the same services for the premises.

4.2 NO-GO ALTERNATIVE

The no-go alternative is the baseline against which all alternatives are assessed. The no-go alternative would essentially entail maintaining the current situation. Erf Re/8161 is currently zoned as “Government”, however the tenants operating on the premises are into different industrial, commercial and business activities.

Given the project location and its status quo, should it happen that the current zoning and land use for Erf Re/8161 remains as is, the situation will continue to negatively affect the tenants in which it will be difficult for them to obtain clearance certificates from the municipality for their respective business operations.

As a result, the no-go alternative is therefore not a viable option for the rezoning exercise for Erf Re/8161. The rezoning of the premises will ensure the optimal and controlled utilisation of the site. Erf Re/8161 belongs to Namibia Post & Telecommunication Holdings (NPTH) Ltd and any unforeseen activities to be considered at the premises will strictly fall into the land use plans of the landlord.

4.3 SITE ALTERNATIVES

With regards to the proposed rezoning exercise, there is no other alternative land use for the intended project.

The environmental footprint on the premises is expected to be minimal given that the project site location does not hold any significant vegetation to be considered. The site is located within an industrial area where similar activities are currently being undertaken. The possible impacts at the project location, both environmental and socio-economic, are of such a nature that they can be mitigated through good practice.

5 PUBLIC PARTICIPATION PROCESS

The purpose of this chapter is to provide an outline of the Public Participation Process, a summary of the process undertaken to date and the way forward with respect to public participation as part of this project. This chapter also provides a summary of the key issues that have been raised to date.

5.1 PUBLIC PARTICIPATION REQUIREMENTS

In terms of Section 21 of the EIA Regulations a call for open consultation with all I&APs at defined stages of the EIA process is required. This entails participatory consultation with members of the public by providing an opportunity to comment on the proposed project. Public Participation has thus incorporated the requirements of Namibia's legislation, but also takes account of international guidelines, including Southern African Development Community (SADC) guidelines and the Namibian EIA Regulations. Public participation in this project has been undertaken to meet the specific requirements in accordance with the international best practice.

5.2 PROPOSED APPROACH

The public participation process (PPP) undertaken for this project can be divided into the following phase:

- Project initiation;
- Environmental Assessment Phase (neighbours and tenants consultation); and
- EIA Phase (if required) by the Ministry of Environment, Forestry and Tourism.

5.2.1 Initiation of the Public Participation Process

The approach adopted for the initiation of the EIA and associated PPP was to identify and contact potential I&APs as possible through a number of activities which included:

- Placement of site notices/ posters in Windhoek namely; City of Windhoek notice board, Windhoek Main Police Station, Namibia Post & Telecommunications Holdings Building (Nampost), Namibia Post & Telecommunications Holdings premises (site) (refer to **Annexure B**);
- Distribution of the Background Information Document to Interested & Affected Parties and adjacent landowners in Windhoek on March 2023 (refer to **Annexure D**);
- Giving written notice of the proposed project to potentially affected stakeholders via email dated March 2023 (refer to **Annexure D**).

As part of the notification period, all of the identified potential I&APs were invited to participate in the EIA process via email. I&APs were given approximately 14 days within which to submit comments or register from **22nd March 2023 – 04th April 2023**.

In the table below are some of the comments raised during the consultation with the adjacent neighbours as well as the tenants operating on the premises. Some of the comments raised at the public meetings fall outside of the scope of the EIA process, however, these comments have been recorded for reference purposes.

Table 4: Main issues received during initial PPP

Impact Group	Potential impacts/ issues identified during the consultation process
Tenant	There are too many potholes around the premises which makes it unsafe for the tenant's vehicles.
Tenant	There is power outage on a daily basis which is affecting and causing inconveniences to our operations. This requires to be fixed.
	Security and the overall management of the premises is satisfactory.
	The ablution facilities on the premises are insufficient. It would be good for each operator to have their own toilet.
	NPTH should consider getting cleaning contractor for the premises given that operators have to individually hire cleaning services – which is an additional cost for them.
	NPTH should consider sectional ownership with an option to buy for the operators.
Tenant	There is constant grinding on the premises which results in noise impacts and ultimately causing a nuisance to other operators.
	The safety and security on site unsatisfactory. The tenants are at risk of robberies. NPTH should consider the installation of more cameras around the premises for the safety of the tenants.
	There are construction nails (from panel beaters) lying around in the premises which are causing tyre punches.
	NPTH should ensure that good management of storm water is in place for the reason that, currently pools of water with litter stands on site for a while. This further contributes to the health effects of the tenants.
	An additional traffic mirror (convex mirror for blind spots) should be installed and erected within the premises to avoid incidences of accidents. Traffic speed limits should also be installed within the premises. This will manage traffic within the premises.
	The current set up on the premises is not conducive for institutional tenants or operators (offices).
	With regards to waste management, the premises is not entirely tidy – there is grass that is not regularly removed from the premises.
Tenant	The ablution facilities are not fully functional – taps and toilets are broken. They are not well maintained.
	Sewage on the premises is not properly managed.
	NPTH to consider proper road marks or signs within the premises. The current ones are not properly marked.
	NPTH should also consider the installation of speed humps within the premises to avoid accidents.

The preliminary database formed the basis of the current I&AP Register, which includes directly affected landowners, relevant authorities and organs of state, who are automatically included in the I&AP register. The current I&AP register includes all the above I&APs identified in the initial database as well as additional I&APs who registered during the comment period (refer to **Annexure D**). It should be noted that the I&AP database will be updated throughout the project as new I&APs register.

5.2.2 Environmental Assessment Phase 2

The second phase of the PPP involved the lodging of the Draft Environmental Impact Scoping Report (DEISR) to all registered I&AP for comment. Registered and potential I&APs were informed of the DEISR for public comment via an email dated **05th April 2023**. An Executive summary of the DEISR was included in the emails to the registered I&APs. I&APs were given until **21st April 2023** (ten working days) to submit comments or raise any issues or concerns they may have with regard to the proposed project.

5.3 WAY FORWARD

Comments and concerns raised by the Interested and Affected Parties during the public consultation process are incorporated in the Final Environmental Impact Scoping Report (FEISR) which will be submitted to MEFT: DEA for consideration and decision making. If MEFT: DEA approves or requests additional information / studies all registered I&APs and stakeholders will be kept informed of the progress throughout the assessment process. The Comments and Response Report (CRR) can be viewed under **Annexure D**.

6 ASSESSMENT METHODOLOGY

The purpose of this chapter is to describe the assessment methodology utilized in determining the significance of the construction and operational impacts of the proposed project, and where applicable the possible alternatives, on the biophysical and socio-economic environment.

Assessment of predicted significance of impacts for a proposed development is by its nature, inherently uncertain – environmental assessment is thus an imprecise science. To deal with such uncertainty in a comparable manner, a standardised and internationally recognised methodology has been developed. Such accepted methodology is applied in this study to assess the significance of the potential environmental impacts of the proposed development, outlined as follows in **Table 5**.

Table 5: Impact Assessment Criteria

CRITERIA	CATEGORY
Impact	Description of the expected impact
Nature Describe type of effect	Positive: The activity will have a social / economical / environmental benefit. Neutral: The activity will have no effect Negative: The activity will have a social / economical / environmental harmful
Extent Describe the scale of the impact	Site Specific: Expanding only as far as the activity itself (onsite) Small: restricted to the site's immediate environment within 1 km of the site (limited) Medium: Within 5 km of the site (local) Large: Beyond 5 km of the site (regional)
Duration Predicts the lifetime of the impact.	Temporary: < 1 year (not including construction) Short-term: 1 – 5 years Medium term: 5 – 15 years Long-term: >15 years (Impact will stop after the operational or running life of the activity, either due to natural course or by human interference) Permanent: Impact will be where mitigation or moderation by natural course or by human interference will not occur in a particular means or in a particular time period that the impact can be considered temporary
Intensity Describe the magnitude (scale/size) of the Impact	Zero: Social and/or natural functions and/ or processes remain unaltered Very low: Affects the environment in such a way that natural and/or social functions/processes are not affected Low: Natural and/or social functions/processes are slightly altered Medium: Natural and/or social functions/processes are notably altered in a modified way High: Natural and/or social functions/processes are severely altered and may temporarily or permanently cease

CRITERIA	CATEGORY
<p>Probability of occurrence Describe the probability of the Impact <u>actually</u> occurring</p>	<p>Improbable: Not at all likely Probable: Distinctive possibility Highly probable: Most likely to happen Definite: Impact will occur regardless of any prevention measures</p>
<p>Degree of Confidence in predictions State the degree of confidence in predictions based on availability of information and specialist knowledge</p>	<p>Unsure/Low: Little confidence regarding information available (<40%) Probable/Med: Moderate confidence regarding information available (40-80%) Definite/High: Great confidence regarding information available (>80%)</p>
<p>Significance Rating The impact on each component is determined by a combination of the above criteria.</p>	<p>Neutral: A potential concern which was found to have no impact when evaluated Very low: Impacts will be site specific and temporary with no mitigation necessary. Low: The impacts will have a minor influence on the proposed development and/or environment. These impacts require some thought to adjustment of the project design where achievable, or alternative mitigation measures Medium: Impacts will be experienced in the local and surrounding areas for the life span of the development and may result in long term changes. The impact can be lessened or improved by an amendment in the project design or implementation of effective mitigation measures. High: Impacts have a high magnitude and will be experienced regionally for at least the life span of the development, or will be irreversible. The impacts could have the no-go proposition on portions of the development in spite of any mitigation measures that could be implemented.</p>

*NOTE: Where applicable, the magnitude of the impact has to be related to the relevant standard (threshold value specified and source referenced). The magnitude of impact is based on specialist knowledge of that particular field.

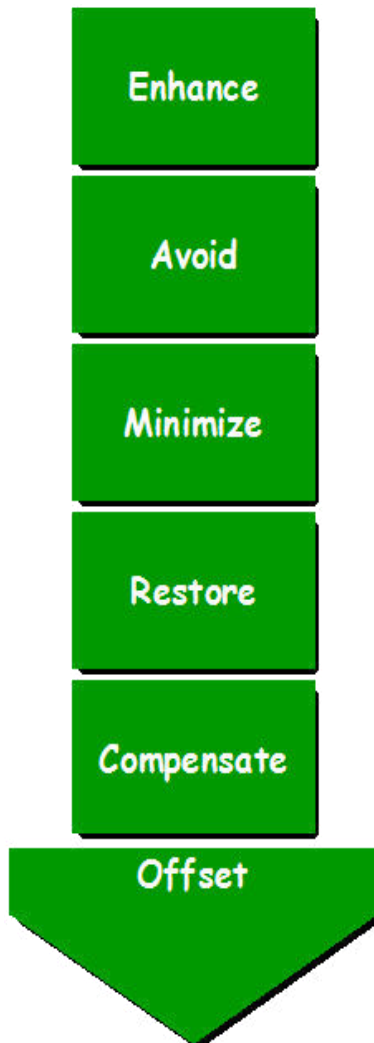
For each impact, the EXTENT (spatial scale), MAGNITUDE (size or degree scale) and DURATION (time scale) are described. These criteria are used to ascertain the SIGNIFICANCE of the impact, firstly in the case of no mitigation and then with the most effective mitigation measure(s) in place. The decision as to which combination of alternatives and mitigation measures to apply lies with Central Oil Namibia (Pty) Ltd as the proponent, and their acceptance and approval ultimately with the relevant environmental authority.

The SIGNIFICANCE of an impact is derived by taking into account the temporal and spatial scales and magnitude. Such significance is also informed by the context of the impact, i.e. the character and identity of the receptor of the impact. The means of arriving at the different significance ratings is explained in the **Table 5**.

6.1 MITIGATION MEASURES

There is a hierarchy of actions which can be undertaken to respond to any proposed project or activity. These cover avoidance, minimization and compensation. It is possible and considered sought after to enhance the environment by ensuring that positive gains are

included in the proposed activity or project. If negative impacts occur then the hierarchy indicates the following steps.



Impact avoidance: This step is most effective when applied at an early stage of project planning. It can be achieved by:

- not undertaking certain projects or elements that could result in adverse impacts;
- avoiding areas that are environmentally sensitive; and
- Putting in place preventative measures to stop adverse impacts from occurring.

Impact minimization: This step is usually taken during impact identification and prediction to limit or reduce the degree, extent, magnitude, or duration of adverse impacts. It can be achieved by:

- scaling down or relocating the proposal;
- redesigning elements of the project; and
- taking supplementary measures to manage the impacts

Impact compensation: This step is usually applied to remedy unavoidable residual adverse impacts. It can be achieved by:

- rehabilitation of the affected site or environment, for example, by habitat enhancement;
- restoration of the affected site or environment to its previous state or better; and
- Replacement of the same resource values at another location (off-set), for example, by wetland engineering to provide an equivalent area to that lost to drainage or infill.

7 ASSESSMENT OF POTENTIAL IMPACTS AND POSSIBLE MITIGATION MEASURES

This chapter is the focus of the EIS Report. It contains a detailed assessment of the operational (or long term) impacts as well as the construction phase (or short term) impacts on the biophysical and socio-economic environments using the methodology described in Chapter 7. A summary table of the assessment of all the potential impacts is also provided.

7.1 INTRODUCTION

This Chapter describes the potential impacts on the biophysical and socio-economic environments, which may occur due to the proposed activities described in Chapter 4. These include potential impacts, which may arise during the operation of the proposed development (i.e., long-term impacts) as well as the potential construction related impacts (i.e., short to medium term). The assessment of potential impacts will help to inform and confirm the selection of the fuel storage facility to be submitted to MEFT: DEA for consideration. In turn, MEFT: DEA's decision on the environmental acceptability of the proposed project and the setting of conditions of authorisation (should the project be authorised) will be informed by this chapter, amongst other information, contained in this EIS Report. In this section only the expected environmental impacts are highlighted.

The evaluation of environmental and associated socio-economic impacts related to the rezoning exercise of Erf Re/8161 has been prepared through the examination of individual environmental components that are potentially affected by the proposed rezoning exercise. This examination evaluates the following:

- Communities attitude towards the site;
- The possibility of the impact to occur;
- The timeframe over which the impact is likely to be experienced (long-term, short-term);
- Possible mitigation or preventive measures.

7.1.1 Construction Phase Impacts

The construction phase impacts are those impacts on the biophysical and socio-economic environment that would occur during the construction phase. They are inherently temporary in duration but may have potential longer lasting effects.

There are currently existing activities in operation on the premises. The tenants and/or operators are all into different types business or industrial activities. Given that the site is fully built up and utilised by the tenants, there will be no construction activities (including excavations) taking place.

There are however some big trees that are of significant value and these trees will not be removed but to be kept and maintained as part of the layout design of the premises.

7.1.2 Environmental Management Plan

An Environmental Management Plan (EMP) is contained in **Annexure A** of this report. The purpose of the EMP is to outline the type and range of mitigation measures that should be implemented during the construction and decommissioning phases of the project to ensure that negative impacts associated.

7.2 OPERATIONAL PHASE IMPACTS

The operational phase impacts are those impacts on the biophysical and socio-economic environment that would occur during the operational phase of the project and are inherently long-term in duration. The operational phase impacts could potentially include:

- Impact on surface and storm water;
- Impact of visual and sense of place;
- Impact of increased vehicular traffic;
- Impact of noise during operation;
- Impact of waste generation and/or management;
- Impact on existing service infrastructure;
- Social impacts.

Each of these impacts is assessed in detail in the section below. The baseline and potential impacts that could result from the proposed rezoning exercise are described and assessed with potential mitigation measures recommended. Lastly, comment is provided on the potential cumulative impacts which could result should this exercise, and others like it in the area, be approved.

7.2.1 Water Pollution Impacts

a) Impact Assessment

Some of the activities taking place on the premises include car wash bay and mechanical (garage) businesses which could have potential impacts and contribute negatively to surface and stormwater. The impacts to arise from these activities may result from the use of the soaps, dirt, grime, grease, and oil washes from the vehicles which can flow into nearby storm drains. Should these contaminants not be trapped on site, it could end up in downstream watercourses with associated impacts on water users and biota. It is therefore essential to ensure that stormwater from the site is properly controlled.

The impact of the proposed project is deemed to result in a **Low-Very Low (negative)** impact for the proposed project especially in the rainy season. However, by implementing the below proposed mitigation measures it would be possible to reduce the impact to a **Very Low (negative)**.

b) Mitigation Measures

- A no-go buffer area of at least 50m should be allocated to any water bodies in the area (if there is any).
- No dumping of waste products of any kind in or in close proximity to the surface water bodies on the premises.
- Ensure that surface 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.
- Re-use of treated waste water should be considered wherever possible to reduce the consumption of potable water – *wherever possible*.

7.2.2 Visual and Sense of Place Impacts

a) Description of the Environment

Erf Re/8161 is visually very prominent from Lazarette street in southern industrial area and it also visible from the surrounding areas or businesses (such as M&Z Garage). The site is already in a fully built-up environment with activities that are as well in full operation. Existing vegetation on-site holds very little potential to screen the site from the surrounding areas.

Very little mitigations exist with regards to reduce the expected visual impact at this stage. Given the flat topography and size of the development, the impact on the sense of place is expected to be **Low-Very Low (negative)**. With proper mitigation measures the significance is expected to be **Very Low (negative)**, to change over time as the area becomes more developed.

b) Mitigation Measures

Given that the site is fully built-up and in operation, it is recommended that the architectural designs and nature of the buildings are maintained and kept as is in order to minimise the visual prominence of the existing activities on the premises within the more natural surrounding landscape. Visual pollutants can further be prevented through mitigations (*i.e., keep existing trees, introduce tall indigenous trees; keep structures unpainted where possible*).

7.2.3 Traffic Impacts

a) Impact Assessment

Given the current status quo of the site, it is expected there will be no increase in traffic which could potentially result in associated noise impacts and/or have an impact on the existing access roads in the area.

However, the impact of increased traffic is however deemed to result in a **Low (negative)** impact for the surroundings along Lazarette street within southern industrial area and it would be possible to reduce the impact to a **Very-Low (negative)**.

b) Mitigation Measures

The following mitigation measures are recommended:

- Ensure that road junctions have good sightlines.
- Adhere to the speed limit.
- Implement traffic control measures where necessary.
- Install more speed humps and convex traffic safety mirrors within the premises

7.2.4 Noise Impacts

a) Impact Assessment

The operation of various types of activities that are already in operation on the premises will result in associated noise impacts. *It should be noted that no specialist was appointed to assess noise impacts as this was deemed not to be a significance issue and generic mitigation measures will be adequate to manage impacts.*

Operational noises associated with the activities as well as other business operations on the premises is expected to be at the level of normal noise generated from an industrial zoned area.

The impact of noise is deemed to result in a **Low (negative)** impact and with proper mitigation measures it would be possible to reduce the impact to a **Very-Low (negative)** for the surrounding areas in close proximity to the site and airport overall.

b) Mitigation Measures

The following mitigation measures are recommended:

- Continuous monitoring of noise levels should be conducted to make sure the noise levels does not exceed acceptable limits (only if required).
- The design and materials use as well as the layout of the development should be such to minimise noises.
- The tenants and/or operators on the premises should take caution in their activities such that noise generated does not affect or cause nuisance to other operators on the premises.

No activity having a potential noise impact should be allowed after 18:00 if possible. By applying a series of the mitigation measures as proposed for general development as well as these above it is believed that any potential nuisance can be significantly reduced.

7.2.5 Dust and Emission Impacts

a) Impact Assessment

Erf Re/8161 is fully built-up and the whole premises is currently paved and the status quo will remain the same.

The air quality in the area is considered to be fairly good. This is based on the impact that the activities currently taking place on the premises are those that are likely to pose negative effects on the air quality.

Emissions associated with the operations on the premises will mostly be generated by vehicle movement. Because the impact is unknown, the entire development needs to be controlled and managed as required by the Public Health Act (Act No. 36 of 1919) and Atmospheric Pollution Prevention Ordinance (No. 11 of 1976).

The impact of dust and emissions is deemed to result in a **Low (negative)** impact and with proper mitigation measures it would be possible to reduce the impact to a **Very-Low (negative)** for Windhoek.

7.2.6 Existing Service Infrastructure Impacts

Given the nature and status quo of Erf Re/8161, there are no additional infrastructure needed as the premises is already fully built-up. However, maintenance of the existing infrastructure such as sewer, waste management as well as the roads is needed. This additional demand is expected to be **Low-Very Low (negative)**.

It is recommended that alternative and renewable source of energy be explored and introduced into the existing operations to reduce dependency on the grid. Other 'green' technologies to reduce the premises dependence should be explored where possible. Water saving mechanisms should be incorporated within the premises in order to further reduce water demands.

7.2.7 Waste Generation

a) Impact Assessment

Erf Re/8161 is currently fully utilised by tenants or operators who are into different activities or operations. Waste is generated from the different operations taking place on the premises. Waste is currently removed from the premises by the proponent's Waste Removal Contractors or the municipality's waste removal division and it is disposed off at an authorised landfill site in Windhoek. Given that there are already activities in operation on the premises, no additional volumes of waste are expected to be generated on the premises.

Care should however, be taken to ensure that the waste generated on site does not become a litter issue, since there is potential for that scenario to develop if not managed correctly and adequately.

The impact of waste generation is deemed to result in a **Medium-Low (negative)** impact and with proper mitigation measures it would be possible to reduce the impact to a **Low (negative)** for Windhoek.

b) Mitigation Measures

The following mitigation measure should be implemented in order to avoid rubbish being blown away by wind:

- It is therefore recommended that the City of Windhoek should provide the premises with sufficient waste skips. These waste skips should be removed on a weekly basis.
- Tenants and/or operators on the premises should strictly make use of the waste skips.

7.2.8 Socio-Economic Impacts

Erf Re/8161 is already in operation with tenants or operators who are into different types commercial and industrial activities. Given the proposed rezoning exercise for Ref Re/8161 to be undertaken, it is expected that this rezoning will positively contribute to the betterment of the tenant's businesses which will ultimately enhance the creation of more direct employment opportunities. This will also involve transfer of skills and the improvement of the quality of life for families of individuals employed. Indirect job opportunities (industries that provide materials and services for the project) are also expected as a result of the operations of the premises.

7.3 CUMULATIVE IMPACTS

Cumulatively, the proposed rezoning exercise of Erf Re/8161 from "Government" to "Industrial" is rated as **high (positive)**. The cumulative impact of the proposed rezoning exercise in regards to the existing activities taking place on the premises (potential pollution of surface and storm water, noise etc) is difficult to rate given the unknown exact type of future activities to be implored after the rezone. With regards to vegetation found on site, these could be rated **Low – Very low (negative)** overall given that there is no significant vegetation on site to be considered and the big trees that are currently on the premises will be kept and maintained as part of the layout profile of the premises.

If all proposed mitigation measures are however in place to minimise the overall impacts, then the cumulative impact can be expected to be rated as **Low (negative)** for Windhoek.

7.4 SUMMARY OF POTENTIAL IMPACTS

A summary of all the potential impacts from the proposed project assessed above is included in **Table 6**. While some difference in magnitude of the potential impacts would result from the

proposed alternatives this difference was not considered to be significant for any of the potential impacts. As such, the table below applies to all proposed alternatives.

Table 6: Summary of the potential impacts of the proposed development (Operation)

Description of potential impact	Project alternative	No mitigation / mitigation	Extent	Magnitude	Duration	SIGNIFICANCE	Probability	Confidence	Reversibility	Cumulative impact
OPERATIONAL PHASE										
Surface Water	Rezoning of Erf Re/8161	No mitigation	Local	Medium-Low	Medium term	Low	Probable	Certain	Reversible	Low (-)
		Mitigation	Local	Low	Medium term	Very Low	Probable	Certain	Reversible	Very Low (-)
	No go	No mitigation	Local	Low	Medium term	Neutral	Probable	Certain	Reversible	Neutral
		Mitigation	Local	Low	Medium term	Neutral	Probable	Certain	Reversible	Neutral
Visual & Sense of place	Rezoning of Erf Re/8161	No mitigation	Local	Medium-Low	Medium term	Low	Probable	Certain	Reversible	Low (-)
		Mitigation	Local	Low	Medium term	Very Low	Probable	Certain	Reversible	Very Low (-)
	No go	No mitigation	Local	Neutral	Medium term	Neutral	Probable	Certain	Reversible	Neutral
		Mitigation	Local	Neutral	Medium term	Neutral	Probable	Certain	Reversible	Neutral
Traffic Impacts	Rezoning of Erf Re/8161	No mitigation	Local	Low	Medium term	Low	Probable	Certain	Reversible	Low (-)
		Mitigation	Local	Very Low	Medium term	Very Low	Probable	Certain	Reversible	Very Low (-)
	No go	No mitigation	Local	Neutral	Medium term	Neutral	Probable	Certain	Reversible	Neutral
		Mitigation	Local	Neutral	Medium term	Neutral	Probable	Certain	Reversible	Neutral
Noise Impacts	Rezoning of Erf Re /8161	No mitigation	Local	Low	Medium term	Low	Probable	Certain	Reversible	Low (-)
		Mitigation	Local	Very Low	Medium term	Very Low	Probable	Certain	Reversible	Very Low (-)
	No go	No mitigation	Local	Neutral	Medium term	Neutral	Probable	Certain	Reversible	Neutral
		Mitigation	Local	Neutral	Medium term	Neutral	Probable	Certain	Reversible	Neutral
Dust & Emissions	Rezoning of Erf Re /8161	No mitigation	Local	Low	Medium term	Low	Probable	Certain	Reversible	Low (-)
		Mitigation	Local	Very Low	Medium term	Very Low	Probable	Certain	Reversible	Very Low (-)
	No go	No mitigation	Local	Neutral	Medium term	Neutral	Probable	Certain	Reversible	Neutral
		Mitigation	Local	Neutral	Medium term	Neutral	Probable	Certain	Reversible	Neutral
Existing Services	Rezoning of Erf Re /8161	No mitigation	Local	Low	Medium term	Medium-Low	Probable	Certain	Reversible	Medium-Low (-)
		Mitigation	Local	Very Low	Medium term	Low	Probable	Certain	Reversible	Low (-)
	No go	No mitigation	Local	Neutral	Medium term	Neutral	Probable	Certain	Reversible	Neutral
		Mitigation	Local	Neutral	Medium term	Neutral	Probable	Certain	Reversible	Neutral
Social Impact (Municipal services & job provisions)	Rezoning of Erf Re /8161	No mitigation	Local	High	Long term	High (+)	Probable	Probable	Reversible	High (+)
		Mitigation	Local	High	Long term	High (+)	Probable	Probable	Reversible	High (+)
	No go	No mitigation	Local	Neutral	Long term	Neutral	Probable	Probable	Reversible	Neutral
		Mitigation	Local	Neutral	Long term	Neutral	Probable	Probable	Reversible	Neutral
Waste Generation	Rezoning of Erf Re /8161	No mitigation	Local	High	Long term	Low	Probable	Probable	Reversible	Low (-)
		Mitigation	Local	High	Long term	Very Low	Probable	Probable	Reversible	Very Low (-)
		No mitigation	Local	High	Long term	Neutral	Probable	Probable	Reversible	Neutral

Description of potential impact	Project alternative	No mitigation / mitigation	Extent	Magnitude	Duration	SIGNIFICANCE	Probability	Confidence	Reversibility	Cumulative impact
	No go	Mitigation	Local	High	Long term	Neutral	Probable	Probable	Reversible	Neutral
Cumulative Impacts	Rezoning of Erf Re/8161	No mitigation	Local	High	Long term	High (+)	Probable	Probable	Reversible	High (+)
		Mitigation	Local	High	Long term	High (+)	Probable	Probable	Reversible	High (+)
	No go	No mitigation	Local	High	Long term	Neutral	Probable	Probable	Reversible	Neutral
		Mitigation	Local	High	Long term	Neutral	Probable	Probable	Reversible	Neutral

8 CONCLUSION

The purpose of this Chapter is to briefly summarise and conclude the Final Environmental Impact Scoping Report (FEISR) and describe the way forward.

8.1 CONSTRUCTION PHASE IMPACTS

With to the nature and current status quo for Erf Re/8161, there will be no construction activities taking place on site however, rehabilitation of the project area will be undertaken to allow for the proposed development to take place.

8.2 OPERATIONAL PHASE

The most significant impact **high (positive)** is the social impact directly associated with the need to rezone Erf Re/8161 which benefits the tenants on the premises as well as the city at large. However, if the proposed rezoning exercise is not implemented, nuisance could be caused to the tenants who are operating on the premises and could cause further difficulties and/or concerns to the tenants to obtain clearance certificates from the City of Windhoek (**Medium-low negative**).

8.3 LEVEL OF CONFIDENCE IN ASSESSMENT

With reference to the information available at the project planning cycle, the confidence in the environmental assessment undertaken is regarded as being acceptable for the decision-making, specifically in terms of the environmental impacts and risks. The Environmental Assessment Practitioner believes that the information contained within this Final Environmental Assessment Report is adequate to allow MEFT: DEA to be able to determine the environmental acceptability of the proposed project.

8.4 MITIGATION MEASURES

With the implementation of the recommended mitigation measures in **Chapter 7** as well as in the EMP (**Annexure A**), the significance of the operational phase impacts is likely to be reduced to a **Low (negative)**. It is further extremely important for the proponent to ensure that all the mitigation measures discussed in this report and the EMP are enforced.

It is noted that where appropriate, these mitigation measures and any others identified by MEFT: DEA could be enforced as Conditions of Approval in the Environmental Authorisation, should MEFT: DEA issue a positive Environmental Authorisation.

8.5 OPINION WITH RESPECT TO THE ENVIRONMENTAL AUTHORISATION

Regulation 15(j) of the EMA, requires that the EAP include an opinion as to whether the listed activity must be authorised and is the opinion is that it must be authorised, any condition that must be made in respect of that authorisation.

In comparing the proposed project and the 'no-go' alternative, it can be seen that the social benefits associated with the rezoning of Erf Re/8161 far outweigh the 'no-go' alternative. In fact, the negative impacts associated with the 'no-go' alternative are in response to the current concerns of the tenants operating on the premises.

It is recommended that this project be authorised, as the rezoning of Erf Re/8161 is highly important for the tenants operating on the premises. The significance of the social impact was therefore deemed to be **High (positive)**.

The “no go” alternative on the other hand was deemed to have a **High (negative)** impact, as all the social and economic benefits resulting from the rezoning of Erf Re/8161 would not be realised.

Based on the above, the EAP is of the opinion that the proposed rezoning exercise be authorised as the benefits outweigh the negative impacts. The significance of negative impacts can be reduced with effective and appropriate mitigation provided in this report and the EMP attached in **Annexure A**. If authorised, the implementation of an EMP should be included as a condition of approval.

8.6 WAY FORWARD

The Final Environmental Impact Scoping Report (FEISR) was made available for public comment from the **06th April 2023 – 21st April 2023**.

Comments received from the Draft Environmental Impact Scoping Report are incorporated in the final EIS report which will be submitted to the Environmental Commissioner, MEFT: DEA for approval.

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