

**ENVIRONMENTAL MANAGEMENT PLAN  
FOR  
THE REZONING OF ERF Re/8161, SOUTHERN  
INDUSTRIAL AREA, WINDHOEK, KHOMAS  
REGION, NAMIBIA**

**FINAL ENVIRONMENTAL MANAGEMENT PLAN**

**APRIL 2023**



**Prepared by: Namibia Environmental Consultants**  
Postal Address: PO Box 40146, Windhoek  
Contact Person: Ruth Nuujoma  
Contact number: +264 81 613 7757  
Email: [ruth@namenvirocon.com](mailto:ruth@namenvirocon.com)

**Prepared for: Namibia Post & Telecommunications**  
Holdings Ltd  
Postal Address: PO Box 3913, Windhoek  
Contact Person: Ms. KA. Naunyangok  
Contact number: +264 61 201 2646  
Email: [naunyangok@telecom.na](mailto:naunyangok@telecom.na)

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## PROJECT DETAILS

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**TITLE:** Environmental Management Plan for the Rezoning of Erf Re/8161, Southern Industrial Area, Windhoek, Khomas Region, Namibia

**APPLICATION NUMBER:** APP - 221214000699

**AUTHORS:** Miss. Ruth Nuujoma (EAP)

**CLIENT:** Namibia Post & Telecommunications Holdings Ltd (NPTH)

**REPORT STATUS:** **Final Operational** Environmental Management Plan

**REPORT DATE:** April 2023

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**MAIN COMPILER:**



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**RUTH NUUJOMA**  
**Registered Environmental Assessment Practitioner**  
**Environmental Assessment Professional Association of Namibia (EAPAN)**  
**Institute of Environmental Management and Assessment (IEMA)**

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**ABBREVIATIONS**

<b>ECC</b>	Environmental Clearance Certificate
<b>ECO</b>	Environmental Control Officer
<b>EIA</b>	Environmental Impact Assessment
<b>EMA</b>	Environmental Management Act (No. 7 of 2007)
<b>EMP</b>	Environmental Management Plan
<b>DEA</b>	Department of Environmental Affairs
<b>IAPs</b>	Interested & Affected Parties
<b>IFC</b>	International Finance Corporation
<b>MEFT</b>	Ministry of Environment, Forestry & Tourism
<b>MEFT: DEA</b>	Ministry of Environment, Forestry & Tourism: Department of Environmental Affairs
<b>NEC</b>	Namibia Environmental Consultants
<b>NPTH</b>	Namibia Post & Telecommunications Holdings

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# 1 INTRODUCTION

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## ***1.1. PURPOSE OF THIS EMP***

This Environmental Management Plan (EMP) is an implementation guiding tool for the environmental and social impacts management. The EMP sets out, in general, the mitigation and monitoring measures and institutional arrangements to address adverse environmental and social impacts.

The purpose of this Environmental Management Plan (EMP) is to provide a consolidated summary of all the Environmental and Social (E&S) commitments relevant for the operational phase of the project. The measures focus on environmental (such as air emissions and the general environmental contamination) and social aspects (such as the protection of human rights, communication with local stakeholders, safety of workers and communities). This EMP also gives an overview about the E&S Management System that is being implemented to ensure systematic and effective execution of these commitments, including roles and responsibilities between the proponent and the tenants.

The Environmental Management Plan (EMP) contains the necessary mitigation and recommended actions as well as the timeframe and person responsible for the actions. The ultimate responsibility of the implementation of the EMP rests on the Manager of Namibia Post & Telecommunications Holdings Ltd (NPTH). Any transgressions must be treated as serious with remedial action to be taken. Any parties responsible for transgression of the underlying management measures outlined in this document will be held responsible of non-compliances and will be dealt with accordingly.

This Environmental Management Plan has been compiled for the management of the operational phase of the premises in southern industrial area, Windhoek. The EMP will provide specific recommendations and mitigation measures on how to minimise negative impacts and therefore protecting the environment on a social as well as biophysical level.

## ***1.2. OBJECTIVES AND PURPOSE OF THE EMP***

The primary objectives of this EMP are to:

- To describe action plans for achieving the mitigation measures described in the EIA.;
- Identify the roles and responsibilities of the environmental and social management organisation of the project; and
- Communicate environmental and social expectations and requirements throughout the proponent's team.
- To highlight a monitoring programme, that will enable review of the success of the EMP and the provision of such information to the relevant decision-makers.
- To highlight a monitoring programme, that will enable review of the success of the EMP and the provision of such information to the relevant decision-makers.
- To provide specific recommendations and mitigation measures on how to minimise negative impacts and therefore protecting the environment mostly on the social level.
- In general, the purpose of this EMP is to formulate mitigatory measures that should be implemented and made binding to all contractors (if any) during the operational phase.

- To outline mitigation measures and environmental specifications which must be implemented to ensure environmental and social protection of the surrounding environment and to prevent long-term or permanent environmental degradation.

### **1.3. COMPONENTS OF THE EMP**

Environmental issues identified in this EMP are specific to the operational phase of the NPTH premises. The EMP has been prepared in an issues-based format that nominates for each environmental issue or impacting activity, the tasks that are required to be addressed during the operational phase of the premises, covering:

- Environmental issues
- Environmental objectives
- Environmental intent
- Control measures
- Responsibility
- Monitoring
- Reporting
- Corrective Action

In terms of the Environmental Assessment Policy of 1994 and the Environmental Management Act No 7 of 2007 (EMA), certain activities have been identified, which could have a substantially detrimental effect on the environment. These listed activities require an Environmental Clearance Certificate (ECC) from the competent environmental authority, i.e. Ministry of Environment, Forestry and Tourism: Department of Environmental Affairs (MEFT:DEA), prior to commencing. The following activities identified in the EIA Regulations (Table 1) apply to the project in question.

**Table 1:** List of triggered activities identified in the EIA Regulations which apply to the proposed project

<b>Activity description and No(s):</b>	<b>Description of Relevant Activity</b>	<b>The portion of the development as per the project description that relates to the applicable listed activity:</b>
<b>Activity 5.1</b> 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.

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## 2 PROJECT LOCATION AND DESCRIPTION

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### 2.1. 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. 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.**

### 2.2. PROJECT DESCRIPTION

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.

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 B**.

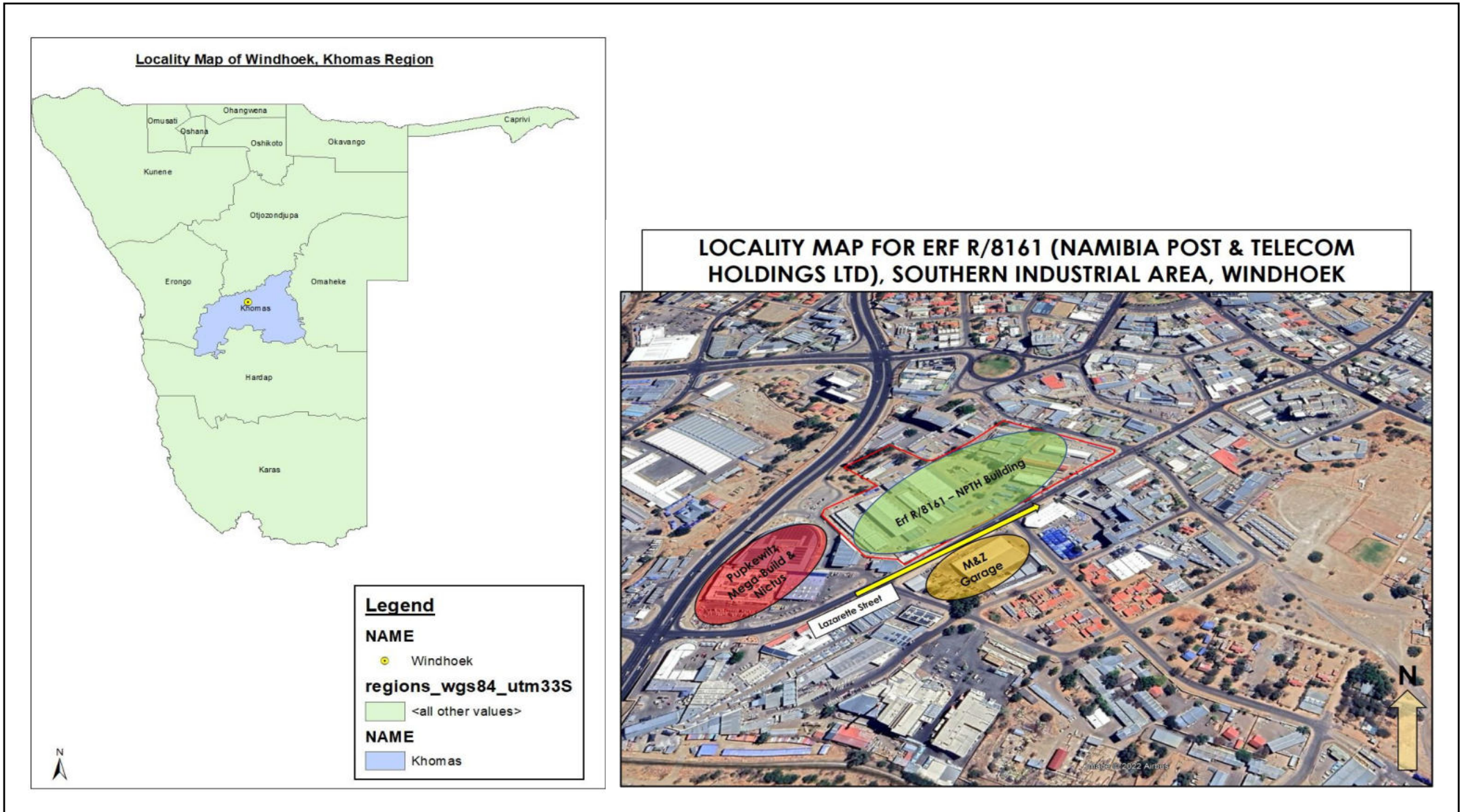


Figure 1: Locality map of Erf Re/8161(NPTH), Southern Industrial Area, Windhoek



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### 3 LEGAL ENVIRONMENTAL FRAMEWORK

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*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.*

#### **3.1. 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.

#### **3.2. 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 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.

### **3.3. 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.

### **3.4. 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.

### ***3.5. BIODIVERSITY LEGISLATION AND POLICIES***

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

- Convention on Biological Diversity (2000)
- Namibian Water Corporation Act (1997)
- Pollution and Waste Management Bill (=)
- Soil Conservation Act (1969)
- United Nations Framework Convention on Climate Change (1992)
- Water Resources Management Act (2004)
- Climate Change Policy (Draft with Attorney General's office)

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.

### ***3.6. 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 wastewater in a manner that may detrimentally impact on a water resource in terms of Section 21 (g).

### **3.7. 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, developers are required to efficiently plan for sewage disposal.

### **3.8. 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 project in question for the rezoning 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 rezoning exercise would not entail the discharge to air and or water.

### **3.9. 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.

### ***3.10. 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.

### ***3.11. 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.

### ***3.12. 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.

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## 4 RESPONSIBLE PARTIES

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Namibia Post & Telecommunications Holdings (NPTH) (Ltd) as the proponent will be responsible for the implementation of this Environmental Management Plan (EMP) during the operational phase of the premises.

The following people are also required during both phases (construction and operational) in order to implement various environmental management related issues.

### **4.1. ENVIRONMENTAL CONTROL OFFICER**

Prior to the commencement of construction and also during the operational phase, a suitably qualified and experienced Environmental Control Officer (ECO) shall be appointed by the proponent to ensure that the mitigation rehabilitation measures are implemented and to ensure compliance with the provisions of the EMP.

#### **4.1.1 Roles and Responsibilities**

The role of the ECO is to oversee and monitor compliance with and implementation of the operational phase EMP. The ECO is therefore responsible for the following responsibilities:

- i. Liaison with the surrounding neighbours, Namibia Post & Telecommunications Holdings (NPTH) (Ltd) and Environmental Authorities;
- ii. Ensuring that the requisite remedial action is implemented in the event of non-compliance;
- iii. Ensuring the proactive and effective implementation and management of environmental protection measures;
- iv. Ensuring that a register of public complaints is maintained by the proponent and that any and all public comments or issues are appropriately reported and addressed;
- v. Routine recording and reporting of environmental activities on a monthly basis;
- vi. Recording and reporting of environmental incidents;
- vii. Notifying the Environmental Authorities immediately of any events or incidents that may cause significant environmental damage or breach the requirements of the EMP
- viii. Take appropriate action if the specifications contained in the EMP are not followed.
- ix. Monitor and verify that environmental impacts are kept to a minimum, as far as possible.
- x. Ensure that activities on site comply with all relevant environmental legislation.

### **4.2. NAMIBIA POST & TELECOMMUNICATIONS HOLDINGS (NPTH) (LTD) (THE COMPANY MANAGER)**

Namibia Post & Telecommunications Holdings (NPTH) (Ltd) must undertake to monitor activities on a daily basis and the ultimate responsibility for satisfying the monitoring requirements. The manager is also responsible for ensuring compliance with all aspects of monitoring.

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## 5 MANAGEMENT OBJECTIVES AND PRINCIPLES

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The following objectives provide the framework for the environmental principles for environmental management of the project:

- Minimise the potential for deterioration of air quality during all project phases.
- Avoid “disturbing” noise levels (an increase in the ambient noise level of 7dB (A) or more at the border of the property from which the noise emanates).
- Minimise the use of clean water and avoid water wastage.
- Prevent the contamination of surface and ground water as a result of the sewage treatment activities (*should there be any*).
- Ensure that an appropriate Emergency Procedure is in place to safeguard the environment, local residents or adjacent neighbours and employees.
- Maintain transparent relations with the Interested & Affected Parties (IAPs) (including surrounding community, authorities and employees).
- Ensure that the community and employees are not subjected to increased safety hazards.

These guideline principles will form the basis for environmental management on site. Should these principles require modification or additions during the project this should be done at the discretion of the responsible person, who will ensure that any modifications are communicated, explained to and discussed with all affected parties.

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## 6 OPERATIONAL PHASE

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### 6.1. INTRODUCTION

This EMP shall be adhered to during the operational phase of the premises. The company manager shall ensure that compliance with this EMP is implemented at all times.

### 6.2. SCOPE

The general principles contained within the EMP shall apply to all construction and operational activities. All operational activities shall observe any relevant environmental legislation and in so doing shall be undertaken in such a manner as to minimise impacts on the natural and social environment.

### 6.3. GENERAL

Namibia Post & Telecommunications Holdings (NPTH) (Ltd), as the proponent is responsible for:

- Ensuring that the objectives of the EMP are given effect;
- Ensuring that all environmental impacts are managed in accordance with the EMP;
- Ensuring that all monitoring and compliance auditing occurs in line with the EMP;
- Ensuring that the environment is rehabilitated as far as practicable to its natural state or existing land use practices;
- Any environmental damage, pollution as a result of activities both in and outside the site boundaries.

With regards to the above, the company manager shall conduct his activities so as to cause the least possible disturbance to the existing amenities, whether natural or man-made in accordance with all the current statutory requirements. Special care shall be taken by the company manager to prevent irreversible damage to the environment. The company manager shall take adequate steps to educate all their tenants or operators on the relevant environmental laws and protection requirements. The company manager shall supplement these steps with prominently displayed notices and signs in strategic locations to remind personnel of environmental obligations.

A suitably qualified independent ECO shall be appointed by the company manager to undertake the following tasks:

- Monitoring of all activities for compliance with the various environmental requirements at regular intervals;
- Routine environmental auditing and reporting of the operations on Erf Re/8161 performance against the EMP;
- Reporting of environmental incidents and routine reporting of environmental issues associated with any possible and unforeseen future construction activities and
- Identifying environmental non-conformances and initiating measures to remedy such issues.



## **6.4. ENVIRONMENTAL AWARENESS**

It is important to ensure that all personnel have the appropriate level of environmental awareness and competence to ensure continued environmental due diligence and ongoing minimisation of environmental harm.

### **6.4.1 Environmental, Health and Safety Induction Course**

The company manager is responsible for informing the tenants of their environmental obligations in terms of the EMP and for ensuring that adequately informed in order to execute the works in a manner that will minimise environmental impacts.

The company manager shall ensure that all its tenants attend an Environmental, Health and Safety Induction Course (*should there be any*). This course shall be structured to ensure that attendees:

- Acquire a basic understanding of the key environmental features on the site and its immediate environs;
- Become familiar with the environmental controls contained in the EMP;
- Are made aware of the need to conserve water and minimize waste;
- Receive pertinent, written instructions regarding compliance with the relevant environmental management requirements (viz. typical environmental “do’s” and “don’ts”);
- Are aware that a copy of the EMP is readily available on site and that all the tenants on the premises are aware of the location and have access to the document;
- Are informed that information posters, outlining the environmental “do’s” and “don’ts” (as per the environmental awareness training course) will be placed at prominent locations throughout the premises.

### **6.4.2 Working Times**

Given the operational phase of the premises, the tenants on the premises are expected to adhere to working times of their employees. Working shifts must be strictly implemented even on public holidays.

## **6.5. ENVIRONMENTAL CONSIDERATIONS PERTAINING TO SITE LAYOUT - WHERE APPLICABLE**

### **6.5.1 Solid Waste Management**

The company manager and shall provide sufficient number of rubbish bins with secured lids. Rubbish bins shall always be placed in pairs, to ensure that one is always present while the other is being emptied. Areas where rubbish is likely to be generated in higher quantities shall be equipped with an additional rubbish bin according to the activities occurring there and the volume of waste being generated.

No waste materials, including domestic, organic or construction wastes shall be burnt, dumped or buried on the premises. Bins shall be emptied daily or as required. The waste may be stored temporarily on the premises in a central waste area that is weather and scavenger proof. The company manager shall, at their own cost, make available the time and resources required in recovering any litter or other wastes that have accumulated or have been dispersed as a result

of his activities at the premises. The central waste storage shall be emptied weekly or as necessary.

#### 6.5.2 Equipment Maintenance and Storage (Pertaining to motor garage repairs/Workshops)

In the event of any oil / lubricant or other hazardous spill, the source of the spillage shall be isolated, and the spillage contained. The tenants shall clean up the spill by removing the contaminated soil to the hazardous waste and the application of absorbent material to the affected area. Treatment and remediation of the spill area shall be undertaken to the reasonable satisfaction of the Environmental Authorities.

#### 6.5.3 Fire Control

Fires are only permitted in designated area and shall not be left unattended. Fire extinguishers shall be readily available in the operational areas of the premises. Any fires that occur outside of designated areas shall be reported to the company manager immediately. The company manager shall be responsible for ensuring that immediate and appropriate actions are taken in the event of a fire and shall ensure that all tenants on the premises are aware of the procedures to be followed.

#### 6.5.4 Emergency Procedures

The company manager shall ensure that the tenants are aware of the procedure to be followed for dealing with leaks and spills, which shall include notifying the company manager. It is the responsibility of the tenants to ensure that the necessary materials and equipment for dealing with leaks and spills are available on the premises at all times.

Emergency equipment including spill kits and fire extinguishers shall be positioned at accessible locations near to areas or facilities where such emergencies may arise.

#### 6.5.5 Water Quality, and Storm Water Control

The company manager and the tenants shall take all reasonable steps to prevent or remediate damage to the environment resulting from the works in the form of improper storm water control management. The company manager shall immediately remedy any situation that is or has the potential to result in water pollution from the works as a result of storm water flows. If required, the company manager shall establish necessary storm water control mechanisms to effectively control the movement of water onto, through and off the premises.

### **6.6. PROTECTION OF NATURAL FEATURES AND HERITAGE RESOURCES**

#### 6.6.1 Archaeological and Heritage Context

The Khomas Region like the rest of Namibia is home to many different cultural groups. The rich variety and distinct cultural values and traditions render a unique character to Namibian society that is a human resource to be proud of and a heritage that needs to be protected and enhanced. Culture shapes the destiny of people and stabilizes the lives of the respective groups on a local level.

No known heritage sites are however located within the surroundings of the premises. **If any heritage or cultural significant artefacts are found in future, the National Heritage Council of Namibia shall be immediately notified.**

## **6.7. COMPLIANCE AND PENALTIES**

### **6.7.1 Compliance**

Environmental management is concerned with the results of the proponent's operations to carry out the control of how the operations on the premises are carried out. Tolerance with respect to environmental matters applies not only to the finished product but also to the standards of the day-to-day operations required to complete the works.

It is thus required that the company manager shall comply with the environmental requirements on an on-going basis and any failure to do so will entitle the ECO to certify the imposition of a penalty as detailed below, if such non-compliance is not corrected within a period of one week of notification thereof.

### **6.7.2 Penalties**

Penalties will be issued for certain transgressions. Penalties may be issued per incident at the discretion of the ECO. Such penalties will be issued in addition to any remedial cost incurred as a result of the non-compliance with this specification. The ECO will inform the company manager of the contravention and the amount of the penalty which becomes the responsibility of the proponent.

Penalties for the activities detailed below will be imposed by the ECO on the proponent.

a) Persistent and un-repaired oil leaks from machinery (motor garage and workshop).	N\$ 2,000
b) Litter on the premises associated with construction activities (if any).	N\$ 2,000
c) Deliberate lighting of illegal fires on the premises.	N\$ 2,000
d) Failure to empty waste bins on a regular basis.	N\$ 200
e) Unauthorised removal of vegetation.	N\$ 500
f) Failure to implement specified noise controls.	N\$ 2,000

For each subsequent similar offence, the penalty shall be doubled in value to a maximum value of N\$ 20,000. The ECO shall be the judge as to what constitutes a transgression in terms of this clause.

## **6.8. ENVIRONMENTAL INCIDENT REPORTING**

All environmental incidents occurring at the premises will be recorded. The incident report will have to include time, date, location and nature of the incident, extent of the incident, actions and personnel involved.

All complaints received from the neighbouring community shall be directed to the company manager of Namibia Post & Telecommunication Holdings (Ltd) and channelled to the appointed Environmental Control Officer. In addition, the proponent's management should also be able to respond to the complainant within a week (even if pending further investigation).

It is important that the issues raised are considered and that the complainant feels that their concerns have been addressed to and whenever possible actions taken to address these. All complaints should be entered in the environmental register and all responses and actions taken to address these should be recorded.

### **6.9. ENVIRONMENTAL MONITORING**

Periodic environmental monitoring must be taken on a regular basis. Monitoring should be done in order to ensure compliance with all aspects of the EMP. Findings should be liaised with to all responsible officers as chain command.

### **6.10. NON-COMPLIANCE OF THE EMP**

Problems may occur in carrying out mitigation measures or monitoring procedures that could result in non-compliance of the EMP. The responsible personnel should encourage staff to comply with the EMP and address acts of non-compliance and penalties.

Namibia Post & Telecommunication Holdings (Ltd) is responsible for reporting non-conformance with the EMP to the ECO. The proponent's management in consultation with the ECO must thereafter undertake the following activities:

- Investigate and identify the cause of non-conformance.
- Report matters of non-conformance to Namibia Post & Telecommunication Holdings (Ltd) (depending on the severity of the incident)
- Implement suitable corrective action as well as prevent recurrence of the incident.
- Assign responsibility to corrective and preventative action.
- Any corrective action taken to eliminate the causes of non-conformance shall be appropriate to the magnitude of the problems and commensurate with the environmental impact encountered.

### 6.11. SUMMARY OF OPERATIONAL PHASE MANAGEMENT ACTIONS

The table below is a summary of the management actions to be taken in order to minimise negative impacts. Please turn back to the relevant section above for more details on the various management actions to be taken for each impact.

**Table 2:** Summarized Management Actions Table

Aspect	Management Objective	Management actions	Responsibility
General	To ensure overall compliance of the EMP.	<ul style="list-style-type: none"> <li>A maintenance plan for Erf Re/8161 must be developed to ensure that good working order is achieved.</li> </ul>	Namibia Post & Telecommunication Holdings (Ltd)
Monitoring	To avoid environmental pollution from potential leakages.	<ul style="list-style-type: none"> <li>A monitoring and eradication programme should be put in place whereby the distribution and abundance of alien and invader fauna are monitored through fixed trapping points.</li> </ul>	Namibia Post & Telecommunication Holdings (Ltd)
Safety to the public	To reduce the risks posed by the operations on the premises to the public.	<ul style="list-style-type: none"> <li>Where the public could be exposed to danger by any of the activities on the premises, the responsible tenant shall provide flagmen, barriers, and/or warning signs in English.</li> </ul>	Namibia Post & Telecommunication Holdings (Ltd) and The Tenants
Penalties	To ensure that environmental requirements are strictly adhered to.	Penalties will be issues for certain specified transgressions.	Namibia Post & Telecommunication Holdings (Ltd)

**Table 3:** Summarized Operational Phase Management Table

Aspect	Management Objective	Management Actions	Responsibility
Solid Waste Management	To ensure that there is no illegal disposal of waste.	<ul style="list-style-type: none"> <li>● Waste must be separated into items which can be reused, composted or recycled and send the remaining portion to the general waste stream for disposal at the landfill site.</li> <li>● All tenants should be made aware of the aim to recycle waste by means of posters, training and staff meetings.</li> <li>● Between collection periods, all waste/recyclable materials generated on the premises shall be kept in enclosed bins with securely fitting lids so that the contents are not able to leak or overflow and blown away by the wind.</li> <li>● Waste must be removed and disposed off at an authorised landfill site in Windhoek by the City of Windhoek or the proponent's waste removal contractors.</li> <li>● Waste skips must be emptied on a daily basis and must be coded.</li> <li>● Arrangements must be in place for the regular maintenance and cleaning of waste/recycling storage areas.</li> </ul>	Namibia Post & Telecommunication Holdings (Ltd) and Tenants
Increased activity on the site and minor increase in traffic (noise impact).	To limit noise levels on site.	<ul style="list-style-type: none"> <li>● Noise levels shall be kept within acceptable limits, and all staff must abide by the relevant Noise Control Regulations.</li> <li>● A noise control policy must be compiled and enforced to control the level of noise at the premises, paying particular attention to the nearest residential properties.</li> </ul>	Namibia Post & Telecommunication Holdings (Ltd) and Tenants
Existing Infrastructure on the premises (visual impact)	To maintain the aesthetic values of the site.	<ul style="list-style-type: none"> <li>● Outside lights are to be inward and downward shining and with low wattage;</li> <li>● Sufficient refuse bins must be provided on site and littering and illegal dumping must not be allowed;</li> <li>● Buildings and other structures should not be visually intrusive and should be maintained on a regular basis;</li> <li>● Landscaped areas must be maintained;</li> </ul>	Namibia Post & Telecommunication Holdings (Ltd) and Tenants

Aspect	Management Objective	Management Actions	Responsibility
		<ul style="list-style-type: none"> <li>Signs must conform to the national and municipal standards of for outdoor advertising.</li> </ul>	
Traffic flow (within the premises) and safety impacts	Operational traffic shall be controlled to ensure minimal disruption to normal road users.	<ul style="list-style-type: none"> <li>Road surfaces in the immediate vicinity of the site should be monitored and the relevant authority should be notified of any unsafe situation;</li> <li>Speed limit of not more than 5 km/h should be applied in the forecourt area of the premises;</li> <li>More convex traffic mirrors shall be installed on the premises to prevent accidents.</li> <li>Adequate onsite parking, loading facilities and manoeuvring space for the light and heavy vehicles (if any).</li> </ul>	Namibia Post & Telecommunication Holdings (Ltd) and Tenants
Dust	To limit dust levels	<ul style="list-style-type: none"> <li>Constant rehabilitation must be implemented and/or the area should be paved.</li> </ul>	Namibia Post & Telecommunication Holdings (Ltd) and Tenants
Ecological Impacts	To minimize the disturbance of flora and fauna found within the premises	<ul style="list-style-type: none"> <li>Prevent illegal removal of protected vegetation (if there is any).</li> <li>Keep surrounding vegetation especially larger trees and shrubs to create a screen that reduces flood impacts.</li> </ul>	Namibia Post & Telecommunication Holdings (Ltd) and Tenants
Emergency Procedures	All tenants on the premises are aware of emergency procedures.	<ul style="list-style-type: none"> <li>The company manager shall ensure that all tenants are aware of the procedure to be followed for dealing with any leaks and spills from any activities performed on the premises.</li> </ul>	Namibia Post & Telecommunication Holdings (Ltd)
Water quality, surface water and storm water management	To avoid contamination of surface water sources from possible leakages.	<ul style="list-style-type: none"> <li>The company manager shall immediately remedy any situation that is or has the potential to result in water pollution from the works operation as a result of storm water flows.</li> <li>Regular bulk services infrastructure and system inspection should be conducted.</li> </ul>	Namibia Post & Telecommunication Holdings (Ltd) and Tenants

Aspect	Management Objective	Management Actions	Responsibility
		<ul style="list-style-type: none"> <li>With regards to surface water, all spills (of any kind) should be cleaned up as soon as possible. The presence of an emergency response plan and suitable equipment is advised, so as to react to any spillage or leakages properly and efficiently.</li> </ul>	
Penalties	To ensure that environmental requirements are strictly adhered to.	Penalties will be issues for certain specified transgressions.	Namibia Post & Telecommunication Holdings (Ltd) and Tenants



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## 7 DECOMMISSIONING PHASE

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Given the nature and purpose of the infrastructure, it is unlikely that this infrastructure will be decommissioned in the foreseeable future. In the unlikely event that use of the infrastructure is discontinued by Namibia Post & Telecommunication Holdings (Ltd), the infrastructure should be “mothballed” or made available or sold to the surrounding land users. Removal of the infrastructure is likely to cause more environmental harm than its abandonment.

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## 8 CONCLUSION

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In conclusion it should be noted that this EMP should be regarded as a living document and changes should be made to the EMP as required by project evolution while retaining the underlying principles and objectives on which the document is based.

The compilation of the EMP has incorporated impacts and mitigation measures as well as incorporating principles of best practice in terms of environmental management.

In addition, provided the operational impacts for this project are mitigated as per the EMP, the project will result in impacts that should not negatively affect the environment.

It is the proponent's responsibility to ensure that this EMP is made a binding document on the contractor (Waste Removal) by including it in the contract documentation. The company manager should thoroughly familiarise himself with the requirements of the EMP and appoint an Environmental Control Officer (ECO) to oversee the implementation of the EMP on a day-to-day basis (if needed).

Parties responsible for transgression of this EMP should be held responsible for any rehabilitation that may need to be undertaken. Parties responsible for environmental degradation through irresponsible behaviour/negligence should receive penalties.

# **APPENDIX A**

## **Curriculum Vitae of Environmental Assessment Practitioner**

**APPENDIX B**  
**Layout Design – Erf Re/6181\_Namibia Post & Telecommunications**  
**Holdings (Ltd)**