

2023

**ENVIRONMENTAL MANAGEMENT PLAN FOR THE
OPERATION AND MAINTENANCE OF AN EXISTING 66KV
KHAN – HENTIESBAY TRANSMISSION LINE AND
HENTIESBAY SUBSTATION IN ERONGO REGION**



**THE DOCUMENT IS PREPARED BY NAMPOWER'S
SHEW SECTION. JANUARY 2023**

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1 LIST OF TERMS, ACRONYMS AND ABBREVIATIONS

APD	Anti-Perching Devices
BFD	Bird Flight Diverters
EAP	Environmental Assessment Practitioner
ECC	Environmental Clearance Certificate
EIA	Environmental Impact Assessment
EMA	Environmental Management Act no 7 of 2007
EMP	Environmental Management Plan
GIS	Geographical Information System
HIV/AIDS syndrome	Human immunodeficiency virus/ acquired immunodeficiency
MEFT	Ministry of Environment, Forest and Tourism
NHC	National Heritage Council
SHE	Safety, Health and Environment
SHEW	Safety, Health, Environment and Wellness
kV	Kilovolt

2 INTRODUCTION

In order to carry out its mandate of transmission and distribution of electricity, NamPower's has a transmission and distribution networks across all regions countrywide. The continuous operation of the transmission and distribution networks allow NamPower to provide uninterrupted supply of electricity to regions in order to improve the living conditions of Namibian citizens and to enable economic development. The 66kV Khan– Henties Bay transmission line is part of this network and it supplies power to Henties Bay Substation.

The 66kV Khan-Henties Bay line route runs north-westwards from the Khan Substation via the Trekkopje Mine area towards Henties Bay. This transmission line is 104 km in length and was constructed with wood (Kamarad) 5 pole structures in 1990. The Henties Bay substation is an indoor substation that covers a footprint of about 550 sqm.



Figure 1: Locality map showing the 66KV Khan-Henties Bay transmission line

2.1 General area description

The 66kV transmission line (Khan-Henties Bay) falls within the vegetation type known as the Central Namib or the Central Desert. The vegetation structure is classified as sparse shrubs and grasses with most grasses being annuals with the plains being “normally” bare, but covered with scattered clumps of *Mesembryanthemum cryptanthum*, *Sporobolus nebulosus*

and *Stipagrostis species* after rains. (Cunningham, 2022). The Khan-Hentiesbay 66kV transmission line falls partially within the !Dorob National Park. The closest communal conservancy, located in the immediate vicinity, is the #Gaingu Communal Conservancy (7,731km²) while no freehold (commercial) conservancies are within the immediate area. The major wildlife resources of the #Gaingu Communal Conservancy are viewed as kudu, gemsbok, springbok and leopard while the most important features are the Spitzkoppe National Monument Area and Rössing Mountain.

The general Khan-Henties Bay 66kV transmission line route, have certain anthropomorphic influences mainly associated with the Trekkopje Mine, Henties Bay urban impacts, tracks and roads, railway line, transmission line and associated access route and infrastructures. The impact of common line activities such as inspections and general maintenance activities would be site specific and have a relatively small environmental “footprint” and is not expected to have a major impact on the environment. Although affected by anthropomorphic influences which affect the ecological integrity of the route, large parts along this route is not often frequented by humans making the overall area unique.

The first section of the route is well vegetated, mainly dominated by *Acacia reficiens* shrubs and *Stipagrostis spp.* grass, with the overall species diversity decreasing as one approach the Trekkopje Substation and decreases further still towards Henties Bay (Figures 2-5).



Figure 2: Barren sandy/gravel plains in the vicinity of the Henties Bay Substation.



Figure 3. Well vegetated and rocky areas in the general Khan Substation area.



Figure 4. Sparser vegetation and dominated by *Stipagrostis spp.* grasses closer to the Khan Substation.



Figure 5. *Zygophyllum stapfii* (dollar bush) – endemic – dominates between Trekkopje and Henties Bay Substations.

The most important plant species found on the line route include: *Commiphora* spp.; *Euphorbia damarana*; *Acacia erioloba*; *Euclea pseudebenus* and Lichens. The closest lichen hotspots includes a Crustose lichen zone east of the dune belt area while extensive patches of fruticose and foliose lichens occur in the Mile 8 and Wlotzkasbaken areas. Some other species known/expected to occur in the general Arandis area are viewed as *Adenia pechuelii*, *Capparis hereroensis* (endemic), *Commiphora dinteri*, *Welwitschia mirabilis*. *Adenia pechuelii*, listed as near threatened is probably the most important species occurring along the route (See Figures 6-8).



Figure 6. *Aloe dichotoma* (quiver tree) – Protected F, Protected NC, N-End, C2 – associated with rocky areas along the route.



Figure 7. *Aloe asperifolia* (kraal Aloe) – Protected NC – on dolerite ridges between Trekkopje and Henties Bay.



Figure 8. Extensive lichen fields in the vicinity of the Henties Bay Substation area.

The route passes through 6 “hotspot” areas classified as “high” sensitivity and 1 “hotspot” area classified as “medium” sensitivity (See Annexure 1). The areas of “high” sensitivity are viewed as the rocky areas; large and well vegetated drainage lines; lichen fields, while the area of

“medium” sensitivity is viewed as a section of dolerite ridges with lichens (i.e. areas with high biodiversity).

The Khan-Henties Bay section is about 104 km in length, of which 8% of the route is viewed as “high” sensitivity and 3.6km; 3.8% of the route is viewed as “medium” sensitivity; while 88.2% is viewed as “low” sensitivity. The “high” and “medium” sensitivity areas especially the rocky areas and well-vegetated drainage lines and lichen fields should be viewed as important with no unnecessary off-road driving during line inspections and/or general maintenance activities i.e. maintain track discipline.



Figure 9. The rocky and well vegetated drainage line close to the Khan Substation is viewed as a “high” sensitivity area.



Figure 10. Vegetated drainage lines close to the Trekkopje Substation are viewed as “high” sensitivity areas.



Figure 11. Dolerite ridges support high diversity of vertebrate fauna and flora species and are viewed as “high” sensitivity areas.



Figure 12. Lichen fields close to the Henties Bay Substation are viewed as “high” sensitivity areas.

3 OBJECTIVES AND SCOPE OF THIS ENVIRONMENTAL MANAGEMENT PLAN (EMP)

The operation of the transmissions line and station can have a negative impact on the receiving environment. However, the impacts are limited to the station boundaries and line servitude. It is thus important that good management measures be implemented to ensure that environmental damage is minimized. This Environmental Management Plan (EMP) seeks to manage and keep to a minimum the negative impacts associated with the transmission line and station and at the same time, enhance the positive and beneficial impacts.

The scope of this EMP include all activities associated with the operation of the transmission line, substations and other infrastructures. It is necessary to highlight that the EMP is a living document that should be periodically reviewed and updated. It must also be noted that the EMP should be read in conjunction with laws and regulations outlined in section 5, Table 1 and all other applicable laws.

The aim of this EMP is to detail the management actions required to implement the mitigation measures identified thereby ensuring that any operational phase activity is carried out in a manner that takes cognizance of environmental protection and is in line with National legislation.

This EMP has the following objectives:

- To outline mitigation measures to be implemented during the operation phase, in order to manage and minimize the extent of environmental impacts.
- Minimize negative impacts and enhance positive impacts associated with the operations.
- To ensure that the operational activities do not result in undue or reasonably avoidable adverse environmental impacts, and ensure that any potential environmental benefits are enhanced.
- To identify key personnel who will be responsible for the implementation of the measures, outline functions and responsibilities.
- To propose mechanisms for monitoring compliance and preventing long term or permanent environmental degradation.
- To ensure that the concerns and complaints of Interested and Affected Parties (I&APs) with regards to the operational activities are addressed effectively and timely.
- Ensure compliance to legislative requirements.

4 POLICY AND LEGISLATIVE FRAMEWORK

Table 1 below outline the legislative requirements which are applicable to the operational and maintenance activities.

Legislation:	Section (s) applicable:	Implications:
Environmental Management Act no 7 of 2007	<p>Section 3</p> <p>Section 27</p> <p>Section 33 onwards</p> <p>And all other applicable sections.</p>	<ul style="list-style-type: none"> • All activities performed should be in line with the following principles: <ul style="list-style-type: none"> ○ Interested and affected parties should have an opportunity to participate in decision making ○ Listed activities should be subject to an EIA ○ Polluter should pay for rehabilitation ○ Pollution should be minimized • Environmental assessments should be carried out for listed activities. The proposed activity can be classified under the following range of activities: <ul style="list-style-type: none"> ○ Generation of electricity ○ Transmission of electricity • These sections details the process to be followed in order to obtain a clearance certificate. • All existing listed activities must obtain a clearance certificate within one year of the law coming into effect. Therefore, all existing activities which can be considered a listed activity should apply for clearance.
EMA Regulations GN 28-30 (GG 4878) (February 2012)	<ul style="list-style-type: none"> • Listed activity: 	<ul style="list-style-type: none"> • This activity can be considered as electricity generation and

	<ul style="list-style-type: none"> • 5.1 • 6 – 9; 13; 15; 21 -24 • Any other applicable sections 	<p>transmission.</p> <ul style="list-style-type: none"> • These sections details the process to be followed in terms of producing an Environmental Assessment and this process should be adhered to during the generation of information for this document.
No. 156 Labour Act, 1992: Regulations relating to the health and safety of employees at work .	All applicable regulations	All regulations applicable to different activities must be complied to.
Labour Act no 11 of 2007	<ul style="list-style-type: none"> • Section 3 • Section 4 • Section 9 • Section 39 – 42 • All other applicable sections 	<ul style="list-style-type: none"> • Children under the age of 16 may not be employed • Forced labour may not be used. • Basic conditions of employment as stipulated by the law must be met. • The employer shall ensure the health and safety of all employees and non-employees on site. Employees must fulfil their duties in order to ensure their own health and safety and that of other employees and persons. Employees may leave the work site if reasonable measures to protect their health are not taken.
Electricity Act no 4 of 2007	<ul style="list-style-type: none"> • Section 33 	<ul style="list-style-type: none"> • Installations used for the provision of electricity should be operated with due compliance with the requirements of laws relating to health, safety and environmental standards. Therefore – any company involved within the Electricity Supply Industry must adhere to the laws covering the previously stated aspects or stand to lose their licenses to operate.

Water Act no 54 of 1956	<ul style="list-style-type: none"> • Section 21 and 132 • Section 23 • All other sections applicable to different activities. 	<ul style="list-style-type: none"> • Conditions in terms of the disposal and management of effluent are to be adhered to. • Any person causing pollution to a water source shall be guilty of an offence.
Public and Environmental Health Act no 1 of 2015	<ul style="list-style-type: none"> • Section 52 • Section 53 • All other sections applicable to different activities. 	<ul style="list-style-type: none"> • A person generating waste must ensure that the waste generated is kept and stored under conditions that causes no harm to human health or damage to the environment. • Waste must only be disposed of at a waste disposal site, including an incinerator approved by the local authority concerned.
Water Resources Management Act no 24 of 2013	<ul style="list-style-type: none"> • Section 89 • All other sections applicable to different activities. 	<ul style="list-style-type: none"> • The owner or occupier or other person in control of land where an incident that causes or is likely to cause a water resource to be polluted must take all reasonable measures to contain and minimize the effects of the incident; and to clean up polluted areas and remedy the effects of the incident.

<p>Hazardous Substances Ordinance 14 of 1974</p>	<ul style="list-style-type: none"> • Section 27 • All other sections applicable to different activities. 	<ul style="list-style-type: none"> • To provide for the control of substances which may cause injury or ill-health to or death of human beings, by reason of their toxic, corrosive, irritant, strongly sensitizing or flammable nature or the generation of pressure thereby in certain circumstances; • To provide for the division of such substances into groups in relation to the degree of danger; • To provide for the prohibition and control of the importation, manufacture, sale, use, operation, application, modification, disposal or dumping of such substances; and • To provide for matters connected therewith.
<p>The Nature Conservation Ordinance (1975) as amended through the Nature Conservation Amendment Act of 1996.</p>	<ul style="list-style-type: none"> • Chapter 11: Game Parks, Nature Reserves, Conservancies and Wildlife Councils 	<ul style="list-style-type: none"> • Permits are required to enter the National Park. Permits are also required for the removal of any protected plant or tree. It also stipulates that no damage may be done to any object of geological, ethnological, archaeological, historical or other scientific interest without the appropriate permits.
<p>National Heritage Act No 27 of 2004</p>	<ul style="list-style-type: none"> • Section: 46, 48, 55 • All other sections applicable to different activities. 	<ul style="list-style-type: none"> • All heritage resources are to be identified and either protected or removed/mitigated with a permit from the National Monuments Council, before any development may take place

		<ul style="list-style-type: none"> • A chance find procedure should be followed in case of discovery of a heritage resource.
Soil Conservation Act no 76 of 1969	<ul style="list-style-type: none"> • Section 4 • Section 13 • Section 21 • And other applicable sections 	<ul style="list-style-type: none"> • Institutions may be ordered by the relevant Minister to construct soil conservation works when and where necessary. • Fire protection schemes may be implemented to regulate the prohibition of veld burning as well as the prevention, control and extinguishing of veld and forest fires. • It is illegal to damage, destroy / fail to maintain any soil conservation works; fire belts; works constructed in terms of a fire protection scheme.
Forest Act no 12 of 2001	<ul style="list-style-type: none"> • Section 132 • Section 41 • And other applicable sections 	<ul style="list-style-type: none"> • Vegetation may not be removed within 100 m of a river, stream or water course • A person shall be liable for damage caused by any fire which arises as a result of activities carried out on site without having taken reasonable measures to prevent a fire.

5 ROLES AND RESPONSIBILITIES

It is the responsibility of NamPower and/or contractor to ensure that all the environmental management actions are carried out effectively and timeously. It is important to note that the successful implementation of the EMP is, however dependent on clearly defined roles and responsibilities by several stakeholders. Below are the key employees that are responsible for the management of environmental and social issues during the operational phase:

Table 2: The roles and responsibilities for operational and maintenance activities:

Responsible person	Responsibilities
The Area Superintendent	<ul style="list-style-type: none"> • Is responsible for the enforcement of the EMP • To ensure that environmental requirements are adequately covered in any external service provider contracts. • To ensure that SHE requirements are included in the tender documents sent to the contractors. A copy of this EMP should also form part of the tender documents. • To ensure that corrective actions are implemented for non-compliances. • To ensure that appropriate records and information regarding compliance with environmental requirements are maintained. • To ensure that the line remain in compliance with the requirements of this EMP, through regular communication and monitoring. • To ensure that all incidents, accidents and complaints are reported to the project manager. The contractor to ensure that incidents and accidents are investigated to prevent re-occurrence.
Project Manager	<ul style="list-style-type: none"> • Is responsible for the enforcement of the EMP. • To ensure that SHE requirements are included in the tender documents sent to the contractors. • Must ensure that the contractor remains in compliance with the requirements of this EMP.
NamPower SHEW	<ul style="list-style-type: none"> • To ensure that all requirements with regards to this EMP are fulfilled. • To assist the Project Manager in ensuring that the contractor remains in compliance with this EMP.

	<ul style="list-style-type: none"> • Communicate NamPower SHEW requirement to the contractors and NamPower employees. • Provides SHEW inductions to NamPower and contractor employees. • Implement monitoring and conduct audits in consultation with the Project Manager. • Document and communicate monitoring, audit and inspection findings to project manager and area superintendent. • Communicate the final inspection report to the Project manager on contractor compliance to the EMP before the project close-off and final payment is made to the contractor.
Contractor	<ul style="list-style-type: none"> • Is responsible for the implementation of the EMP • To appoint as SHE officer responsible for the implementation of this EMP. • To ensure that all tasks undertaken under the scope of work, are in accordance both with NamPower's SHEW policies and procedures as well as to the requirements of this EMP. • Ensure that employees are regularly trained and awareness built relating to environmental and social management. • To ensure that all incidents, accidents and complaints are reported to the project manager. The contractor to ensure that incidents and accidents are investigated to prevent re-occurrence. • Ensuring that all employees receive a SHEW induction before the start of the project. • Ensuring that the work being done does not create a nuisance to any being working, residing or living on adjacent properties or within the immediate surroundings of the site.

6 DESCRIPTION OF OPERATIONAL ACTIVITIES TO BE UNDERTAKEN AND ASSOCIATED IMPACTS

The table below outlines the summary of the operational activities and associated socio-economic and environmental impacts.

Table 3: Description of the activities related to the operational activities.

Activity	Description	Associated potential impacts
General functioning of the station and transmission line.	<ul style="list-style-type: none"> • Physical presence and functional characteristics of the station and associated line. 	<ul style="list-style-type: none"> • Animal (including birds) mortalities through collisions and electrocution. • Destruction of avifauna, especially protected spp. • Visual impact. • Community impacts in a form fatalities or injuries caused by electrocution. • Meeting electricity demand (positive impact).
Maintenance of the station and line	<ul style="list-style-type: none"> • The maintenance of the station and line entails: • General equipment repairs. • Replacement and servicing of batteries. • Maintenance of electrical equipment such as transformers, relays and capacitors. • Maintenance of electrical equipment such as transformers, relays and capacitors. 	<ul style="list-style-type: none"> • Soil and water contamination • Waste generation leading to filling up of landfill space • Destruction of vegetation; vertebrate fauna; avifauna especially protected spp. and sensitive habitats. • Social issues related to the introduction of new workers in the area, e.g. HIV/AIDS spreading. • Loss of human life (through electrocution).

	<ul style="list-style-type: none"> • Construction or repairing of access roads. 	
Construction	<ul style="list-style-type: none"> • Construction include the following activities: • Construction or refurbishment of buildings (digging and setting of foundations, digging of cable trenches and other activities) . • Installation or extension of boundary fences • Upgrade of electrical equipment (either in size, capacity or technology). • Personnel conduct in surrounding communities. 	<ul style="list-style-type: none"> • Noise emissions • Dust emissions • Introduction of new people in the area leading to the spread of diseases such as HIV/AIDS • Soil and water contamination • Waste generation leading to filling up of landfill space • Employment of casual workers • Loss of biodiversity reduces habitat availability and food sources for many animals. • Loss of sensitive plants and habitats. • Loss or damage of heritage resources.
Periodic inspections and monitoring	<ul style="list-style-type: none"> • Replacement, cleaning and maintenance of station and line components. 	<ul style="list-style-type: none"> • Soil and ground water contamination as a result of oil spills • Soil contamination because of improper waste handling and disposal. • Loss of biodiversity if existing access roads are not put to use.
Use and storage of Hazardous Substances	<ul style="list-style-type: none"> • Storage of hazardous material. 	<ul style="list-style-type: none"> • Possible oil spills and soil contamination from electrical units such as transformers.

Installation of Optic Fibre networks	<ul style="list-style-type: none"> • Design, Supply, Delivery, Installation and Commissioning of Optic Fiber networks for communication purposes. 	<ul style="list-style-type: none"> • Loss of biodiversity • Soil contamination as a result of improper waste handling and disposal. • Loss of sensitive plants and habitats.
Vegetation Management	<ul style="list-style-type: none"> • Removal of trees and bushes to maintain access to the line servitude. Removing weed from the substation yard. 	<ul style="list-style-type: none"> • Destruction of vegetation; vertebrate fauna; avifauna especially protected spp. and sensitive habitats. • Conflict with landowners • Loss of topsoil • Soil and water contamination • Loss or damage of heritage resources. • Soil erosion • Destruction of sensitive habitats

7 MANAGEMENT AND MITIGATION MEASURES

In order to ensure that the potential impacts are eliminated and/or minimised, it is necessary to ensure that the various activities related to the operation and maintenance of the power lines and station are adequately managed and monitored. Table 4 below outline mitigation measures as well as objectives to be achieved. A responsible person (s) have been assigned to each mitigation measure (s).

Table 4: Proposed mitigation measures for the general operational activities

ASPECT	MANAGEMENT AND MITIGATION MEASURES/COMMITMENTS	RESPONSIBLE PERSON
Safety Health and Environmental (SHE) Awareness	<ul style="list-style-type: none"> • All employees should undergo SHE induction before work commences onsite. • All employees are to be made aware of their individual roles and responsibilities in achieving compliance with the EMP. • SHE toolbox talks to be conducted by the contractors and records to kept onsite. • Warning signs must be placed on and around the site. 	<ul style="list-style-type: none"> • Area superintendent • Project manager • SHEW • Contractor
Safety Management	<ul style="list-style-type: none"> • Develop and implement an occupational health and safety system that comprises key elements such as risk assessment and safe working procedure. • All work activities to be done under the supervision of a competent person. • Appropriate warning signs must be placed on the facilities. 	<ul style="list-style-type: none"> • Area superintendent • Project manager • Contractor
Fire Management	<ul style="list-style-type: none"> • Eliminate the presence of potential sources of ignition and provide appropriate equipment to minimize fire risk. • Fire extinguishers to be readily available onsite, especially when hot works are 	<ul style="list-style-type: none"> • Area superintendent • Project manager • Contractor

ASPECT	MANAGEMENT AND MITIGATION MEASURES/COMMITMENTS	RESPONSIBLE PERSON
	<p>conducted.</p> <ul style="list-style-type: none"> • Regular servicing of fire extinguishers. • Firefighting training to be provided to employees. 	
Air Quality	<ul style="list-style-type: none"> • Dust generation from all activities must be minimised. • Excavation, handling and transportation of erodible materials shall be avoided under high wind conditions or when a visible dust plume is present. • Speed limit to be enforced to control dust emissions. • Dust suppression measures shall be implemented when necessary. • Vehicle, machinery and equipment shall be maintained in good working order in order to minimise exhaust fume emissions. • Vehicle, machinery and equipment must be serviced by competent personnel and records must be kept onsite 	<ul style="list-style-type: none"> • Area superintendent • Project manager • Contractor
Resources Efficiency	<ul style="list-style-type: none"> • Minimise water wastage and record water usage. • Avoid wasteful use of materials. 	<ul style="list-style-type: none"> • Area superintendent • Project manager

ASPECT	MANAGEMENT AND MITIGATION MEASURES/COMMITMENTS	RESPONSIBLE PERSON
	<ul style="list-style-type: none"> • Source goods and services locally were possible 	<ul style="list-style-type: none"> • Contractor
Waste Management	<ul style="list-style-type: none"> • Minimise the generation of waste by applying the waste hierarchy. • Station and line servitude to be kept free of waste. • No burning, burying or dumping of any waste materials shall be permitted onsite. • Labelled waste bins with lids must be provided at substations/campsites for all waste streams and ensure that waste is disposed at nearest approved waste disposal site. • Ensure that waste segregation is done at source. • Hazardous waste shall be disposed of at a registered hazardous waste disposal site. • Safe disposal certificates for hazardous waste must be kept in the SHE file. • Concrete waste must not be dumped on site. 	<ul style="list-style-type: none"> • Area superintendent • Project manager • Contractor
Wastewater management	<ul style="list-style-type: none"> • Water containing environmental pollutants shall be collected and removed from site. 	<ul style="list-style-type: none"> • Project manager • Contractor

ASPECT	MANAGEMENT AND MITIGATION MEASURES/COMMITMENTS	RESPONSIBLE PERSON
	<ul style="list-style-type: none"> • No waste water runoff or uncontrolled discharges from the site/working areas shall be permitted. • Mobile toilets or septic tanks should be used in remote areas. 	<ul style="list-style-type: none"> • Area superintendent
Hazardous Substances	<ul style="list-style-type: none"> • The use, handling, storage and disposal of the hazardous chemical must be in accordance with the MSDS. • Containers must be clearly marked to indicate contents and quantities. • Hazardous substances storage areas must be bunded. A bund should be able to contain 110% of the volume of the largest container stored within it. • All transformers to be contained in bunded areas. • Diesel and other liquid fuel, oil and hydraulic fluid must be stored in appropriate storage tanks or in bowsers with secondary containment. • Inspect and maintain hazardous storage areas and bund walls to avoid overflows. • Ensure that drip trays are available for vehicles when conducting maintenance activities in case of transmission fluid spills. • Spill kit and absorbents must be available onsite at substations. 	<ul style="list-style-type: none"> • Area superintendent • Project manager • Contractor

ASPECT	MANAGEMENT AND MITIGATION MEASURES/COMMITMENTS	RESPONSIBLE PERSON
	<ul style="list-style-type: none"> • Hazardous substance storage areas must display safety symbolic signs. • All spills must be reported, cleaned and remediated to in compliance with SHEW requirements. 	
Social Impact	<ul style="list-style-type: none"> • NamPower/ Contractor must sign land permission form and agreement with land owners prior to commencement of work onsite. • Employees should limit their contact with permanent residents of the area. • Employees should be properly educated about the impact of HIV / AIDS and pregnancies. • The use of intoxicating liquor or drugs of any kind by the employees is strictly prohibited. • Ensure that all queries and complaints are documented and dealt with. • A register shall be kept of all complaints from stakeholders. • All claims shall be handled immediately to ensure timely rectification. 	<ul style="list-style-type: none"> • Area Superintendent • Project Manager • All NamPower employees • Contractor
Archaeology	<ul style="list-style-type: none"> • Should a heritage site or archaeological site be uncovered or discovered during the operation phase, a “change find” procedure in appendix 8 should be applied. 	<ul style="list-style-type: none"> • Area superintendent • Project Manager

ASPECT	MANAGEMENT AND MITIGATION MEASURES/COMMITMENTS	RESPONSIBLE PERSON
	<ul style="list-style-type: none"> • Any chance finds must be reported to NamPower environmental section. • In an event of discovery of human remains or other artefacts the work shall cease. A professional archaeologist is to be consulted and carry out investigation. 	<ul style="list-style-type: none"> • SHEW • Contractor
Fauna and Flora	<ul style="list-style-type: none"> • Ensure that the site is kept clean and free of rubbish that could potentially attract animals and pests • No harvesting or damaging of plants is allowed. • Poaching or capturing of any animal (wild or domestic) is prohibited. • Bird nests may not be disturbed unless interfering with the normal operation of the line/station. • Vehicles driving along the lines should engage four wheel drive to prevent spinning and consequent impacts on soil surface. • Do not destroy, damage, collect any protected flora species that may be encountered during maintenance clearing of servitude operations; • Avoid rocky hill, drainage line, dolerite ridge areas as well as lichen fields • No chemical/mechanical clearing should be conducted along this transmission line route. 	<ul style="list-style-type: none"> • Area superintendent • Project Manager • Contractor

ASPECT	MANAGEMENT AND MITIGATION MEASURES/COMMITMENTS	RESPONSIBLE PERSON
	<ul style="list-style-type: none"> • Identify potential bird collision prone areas (i.e. habitats). • Install bird flight diverters (BFD's) and anti-perching devices (APD's) to the transmission line along unique/sensitive habitats • Monitor all bird mortalities encountered under the transmission line. • All wildlife and electrical infrastructure interactions must be reported to the SHEW section. • Liaise with MEFT prior to any maintenance activities within the protected area. • Ensure that you are in possession of a park entry permit when working in the national park. 	
Water Resources	<ul style="list-style-type: none"> • Care must be taken to ensure that pollution of water does not occur. • Naturally occurring water resources may not be used for any personal hygiene. • Water may only be taken from a private or government property based on an agreement between the NamPower, contractor and custodian of the water source. 	<ul style="list-style-type: none"> • Area superintendent • Project Manager • Contractor
Erosion	<ul style="list-style-type: none"> • Implement and maintain erosion control measures where applicable along the access route. 	<ul style="list-style-type: none"> • Area superintendent • Project Manager

ASPECT	MANAGEMENT AND MITIGATION MEASURES/COMMITMENTS	RESPONSIBLE PERSON
	<ul style="list-style-type: none"> • Rehabilitate eroded areas 	<ul style="list-style-type: none"> • Contractor
Campsite Establishment	<p>In case there is a need for camping:</p> <ul style="list-style-type: none"> • NamPower/ Contractor must sign land permission form and agreement with land owners prior to commencement of work onsite. • Adequate ablution facilities must be provided onsite in relation to the number of employees. • Ablution facilities must not be located within 100m of any river, stream channel, pan, dam or borehole • Non-employees are not allowed to reside at the campsite. • Fire extinguishers, first aid kits, assembly point, and emergency numbers must be available onsite. • Waste must be managed in accordance with waste management requirements outlined in this EMP. 	<ul style="list-style-type: none"> • Area superintendent • Project Manager • Contractor
Site Rehabilitation (progressive and post rehabilitation)	<ul style="list-style-type: none"> • Progressive rehabilitation when construction work is in progress. Post construction rehabilitation must also be done. All materials, equipment and waste must be removed from site. 	<ul style="list-style-type: none"> • Area superintendent • Project Manager

ASPECT	MANAGEMENT AND MITIGATION MEASURES/COMMITMENTS	RESPONSIBLE PERSON
	<ul style="list-style-type: none"> • A post construction audit within 1 week prior to the Contractor leaving site must be conducted. • SHEW to sign site close off or take over certificate once remedial corrective actions have been implemented. 	<ul style="list-style-type: none"> • SHEW • Contractor

8 REPORTING, MONITORING AND AUDITING

The environmental monitoring and audits must be conducted in line with supporting procedures and requirements of this plan. Monitoring and audit reports detailing the monitoring and audit results shall be prepared by the SHEW section and communicated to the Area Manager, Superintendent and Project Manager. Records of monitoring and auditing report shall be kept and will be made available during inspection and audits.

9 NON-COMPLIANCE AND CONFLICT MANAGEMENT PROCEDURES

The Area Superintendent and Contractor shall ensure that the employees and external service providers comply with the requirements outlined in this EMP. In the event of non-compliance the following recommended process shall be followed:

- Non – compliances will be identified during inspections or audits carried out by the SHEW Section and reported to the Area manager, Superintendent and Project Manager for corrective actions.
- Area Superintendent / Project Manager shall notify the responsible stakeholders about the non-compliance .
- Corrective and preventative actions must be implemented on an agreed timeframes.
- Follow – up inspections/audits shall be conducted to assess whether the corrective and preventative actions were implemented effectively.

The contractor shall notify NamPower of the following:

- Conflicts arising with any landowner / representative.
- Any special conditions requested by a landowner / representative.

NamPower has the right to stop all contractor's activities if it is found that a gross violation of the EMP is taking place.

10 RECORD KEEPING

Record keeping is important for the effective functioning and implementation of an EMP. EMP documentation must be kept in both the hard copy and electronic format for safe keeping. These must include:

- Copy of the Environmental Clearance Certificate
- A copy of an EMP
- EMP implementation activities
- Induction records
- Resource use records i.e. water and fuel consumption
- Audit and Inspection reports

11 CONCLUSION

All management measures and legal requirements outlined in this EMP should be implemented in order to ensure environmental compliance by all parties undertaking the operational activities. This will ensure that potential negative impacts are identified, avoided or mitigated and positive impacts are enhanced.

12 ANNEXURES

Annexure 1: Areas of importance, with protected species potentially affected, along the Khan-Henties Bay 66kV transmission line.

[Direction: Khan Substation north-westwards towards the Henties Bay Substation]

Hotspot areas	Distance (km)	Area	Important species	Common names	Aliens	Other important features	Importance ranking
	0 to 1.2	Khan SS	<i>Commiphora</i> spp. <i>Euphorbia damarana</i>			Rocky area + drainage line	High
	1.2 to 3.0	Khan SS					Low
	3.0 to 4.0	Khan SS				Hills	High
	4.0 to 10.9	Khan SS					Low
	10.9 to 11.2	Khan SS	<i>Acacia erioloba</i>	Camel thorn		Drainage line	High
	11.2 to 23.7	Trekkopje SS					Low
	23.7 to 24.0	Trekkopje SS	<i>Euclea pseudebenus</i>	Wild ebony		Drainage line	High
	24.0 to 49.0	Trekkopje SS					Low
	49.0 to 52.8	Trekkopje SS				Hills + drainage lines	High
	52.8 to 84.4	Henties Bay SS	Lichens			Dolerite ridges + lichens	Medium
	84.4 to 93.5	Henties Bay SS	Lichens			Lichen fields	High
	93.5 to 94.5	Henties Bay SS					Low

Annexure 2: Protection of Ecology & Vegetation

Activity: Protection of Ecology & Vegetation	Compliance	
	Yes	No
Track discipline		
Evidence of new tracks		
Evidence of offroad driving		
Evidence of turnaround violations		
Evidence of oil spills		
Evidence of waste		
Evidence of litter		
Illegal collection/damage of flora		
Evidence of illegal plant collection		
Evidence of vehicle damage to plants		
Evidence of unauthorised people/vehicles		
Erosion		
Evidence of erosion along route		
Evidence of recovery at rehabilitated sites		
Invasive alien plants		
Evidence of invasive alien plants along route - New		
Evidence of invasive alien plants along route - Existing		
Evidence of invasive alien plants at rehabilitated sites		
New species		
Any new plants encountered – i.e. not previously observed		
Domestic stock/pets		
Domestic stock and/or pets encountered along route (Relevant to Protected Areas only)		
Bird mortalities		
Record all dead birds encountered below the line		

Annexure 3: Landowner permission form



Landowner Permission Form



Landowner name:	Contact number:
Representative name:	
Farm name:	
Contractor:	
Representative name:	Contact number:

General Notice

This form is to be used prior to a contractor entering a landowner's property to commence any work related to the construction or maintenance of power-line structures and servitudes.

The form must be completed by either the landowner or his / her legal representative on the property.

Section A: Before activities commence

Activities to be undertaken on the property (completed by the contractor):

Use of water resources
Powerline erection
Powerline refurbishment
Trimming of vegetation
Use of other infrastructure
(please specify)

Camping
Bush clearing
Herbicide application
Access road usage
Rehabilitation

Specific conditions to be met on the property (as stipulated by the landowner):

Dates when access is needed:

From: _____

To: _____

Signatures (prior to entry)

Landowner/Representative

Contractor representative

Date

Date

Section B: Upon completion of work and prior to leaving the property

Remarks on compliance or misconduct (upon completion of activities):

Issues still to be resolved upon completion of activities:

Signatures (upon completion)

Landowner/Representative

Contractor representative

Date

Date

Annexure 4: Chance find procedure

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

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

Procedure:

Action by person identifying archaeological or heritage material

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

Action by foreman

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

Action by superintendent

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

Action by archaeologist

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

In the event of discovering human remains

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