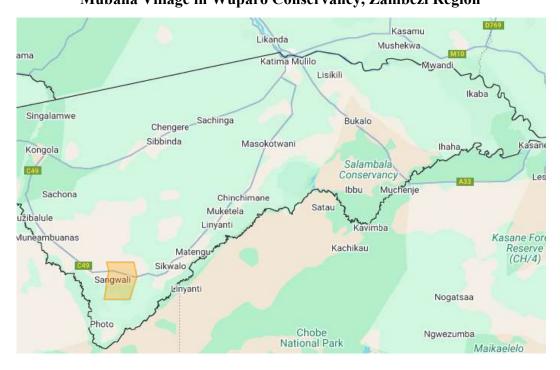


APP: 240930004751

Environmental Scoping Study For the Proposed Drilling of Boreholes for Water Supply at Mubana Village in Wuparo Conservancy, Zambezi Region



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ACRONYMS

CBNRM	Community Based Natural Resource Management		
CCFN	Community Conservation Fund of Namibia		
CEO	Chief Executive Officer		
DEA	Department of Environmental Affairs		
DWA	Department of Water Affairs		
EA	Environmental Assessment		
EAP	Environmental Assessment Practitioner		
EC	Environmental Commissioner		
ECC	Environmental Clearance Certificate		
ECO	Environmental Compliance Officer		
EIA	Environmental Impact Assessment		
EMA	Environmental Management Act (No. 7 of 2007)		
EMP	Environmental Management Plan		
ESI	Environmental Social Indicators		
ESMF	Environmental and Social Management Framework		
FDM	Frequency Domain Electromagnetic		
FPIC	Free Prior Informed Consent		
GPS	Global Positioning System		
GRM	Grievance Redress Mechanisms		
HWC	Human Wildlife Conflict		
HWC and WC	Human Wildlife Conflict - Wildlife Crime		
I&APs	Interested and Affected Parties		
ILO	International Labour Organization		
IRDNC	Integrated Rural Development and Nature Conservation		
ISO	International Standard Organisation		
IWRM	Integrated Water Resource Management		
KFW	German Development Bank		
L	Litre		
m ³	Cubic		

MAWLR	Ministry of Agriculture Water and Land Reform		
MEFT	Ministry of Environment Forestry and Tourism		
MM	Millimetres		
Mm ³	Million Cubic		
NACSO	Namibian Association of CBNRM Support Organizations		
°C	Degree Celsius		
OMDEL	Omaruru Delta		
PPE	Personal Protective Equipment		
PPP	Public Participation Process		
R	Reversible		
RD	Red-Dune Consulting CC		
SEMP	Social Environmental Management Plan		
SM	Site Manager		

EXECUTIVE SUMMARY

Before Namibia's independence in 1990, people living in communal areas had limited rights to access or use wildlife. After gaining independence, Namibia implemented policies and legal frameworks aligned with Article 951 of its Constitution, which allowed communities and private businesses to benefit from wildlife tourism and sustainable natural resource management. This approach is known as Community-Based Natural Resource Management (CBNRM).

i. The CBNRM Concept

The CBNRM concept is based on the idea that when rural communities have rights to use, benefit from, and manage natural resources, they are motivated to use them sustainably. By establishing Conservancies, the CBNRM program connects conservation with poverty reduction, fostering industries like conservation, hunting, and tourism. This drives economic growth, creates jobs, and improves the well-being of rural communities.

ii. Wuparo Conservancy and Human-Wildlife Conflict

Wuparo Conservancy, located in the southern part of the Zambezi Region, it borders Baylerwa Conservancy to the west and Dzoti Conservancy to the east. Additionally, it is adjacent to Nkasa Rupara National Park to the southeast and Mudumu National Park to the northwest. The proposed borehole will be drilled at Mubana Village.

Nestled between two national parks, the Conservancy is a migratory route to key wildlife animals including elephant, hyenas, lions, leopards, and wild dogs which destroy crops and attack livestock which lead to incidents of human-wildlife conflict.

iii. Addressing Human-Wildlife Conflict through Community Conservation Fund of Namibia (CCFN)

To address the HWC challenge, Wuparo Conservancy applied for a grant from the Community Conservation Fund of Namibia (CCFN) to be support with drilling of a water point at Mubana area.

iv. The Mubana Borehole

With funding from the German government through KfW Development Bank, CCFN is implementing the "Poverty-Oriented Support to Community Conservation in Namibia" project. This initiative aims to promote biodiversity conservation and rural development by establishing sustainable Human-Wildlife Conflict (HWC) management systems in communal conservancies. As part of this effort, CCFN is assisting the Sheya Shuushona Conservancy in drilling a borehole in the Iitapa area. The project focuses on developing long-term HWC management solutions and supporting conservancies in addressing these challenges in alignment with Namibia's national policies.

v. Environmental Compliance and the Role of Red-Dune Consulting CC (RDC)

Section 27 of the Environmental Management Act (EMA) lists the "Abstraction of groundwater" as an activity that may not be undertaken without an Environmental Clearance Certificate. To fulfil this statutory requirements, Red-Dune Consulting CC (RDC) was appointed to develop an Environmental Management Plan (EMP) to guide the drilling and operation of the proposed borehole.

vi. Project Impact and Groundwater Monitoring

The project's scale is relatively small, and its potential negative impacts are minimal. In fact, it has a positive socio-economic impact by addressing the challenge of Human-Wildlife Conflict (HWC). The boreholes will be drilled in areas that are free of significant biodiversity. However, excessive groundwater extraction, particularly over the long term, could lead to the deterioration of water quality and depletion of the water table. Therefore, it will be essential to implement groundwater monitoring measures to ensure sustainable management.

1 INTRODUCTION AND BACKGROUND

1.1 Poverty Oriented Support to Community Conservation in Namibia

The Community Conservation Fund of Namibia (CCFN) is a non-profit Association incorporated under Section 21 of Namibia's Companies Act of 2004. Using a foundation model, the CCFN is mandated to raise funds and manage various financial mechanisms such as endowments, sinking or revolving funds, to ensure the long-term sustainability of Community-Based National Resource Management (CBNRM) activities that are carried out by communal conservancies and other entities with a similar legal mandate.

1.2 Community Based Natural Resource Management

Prior to Namibia's independence in 1990, wildlife management in communal areas was characterized by significant restrictions. Residents had limited wildlife utilization rights, particularly regarding hunting. Wildlife, especially predators and foraging animals, were viewed primarily as threats due to their destructive impact on crop fields, potential for human attacks, livestock predation, and infrastructure damage. These conflicts often led communities to retaliate by killing wildlife, giving rise to what became known as Human Wildlife Conflict and Wildlife Crime (HWC-WC).

Following independence, Namibia underwent a fundamental shift in its approach to wildlife management, guided by Article 951 of the Constitution, which states: "The State to actively promote and maintain the welfare of the people by adopting policies aimed at the maintenance of ecosystems, essential ecological processes and biological diversity of Namibia and utilization of living natural resources on a sustainable basis for the benefit of all Namibians, both present and future." This constitutional mandate led to the development of new policies, legal frameworks, and strategies to address HWC-WC.

A key innovation was the introduction of Community-Based Natural Resource Management (CBNRM), governed by the National Policy on Community Based Natural Resource Management.

This approach enables local communities and private businesses to benefit from wildlife-based tourism and sustainable resource management. The CBNRM concept operates on the principle that when natural resources hold substantial value for rural communities, and when communities are granted rights to use, benefit from, and manage these resources, they develop stronger incentives for sustainable resource management through conservancy establishment. This program effectively links conservation efforts with poverty reduction by developing conservation hunting and tourism industries, thereby contributing to the national Gross Domestic Product, creating employment opportunities, and improving the overall well-being and social development of rural communities.

1.3 Conservancies and Management

Conservancy establishment and operation is provided for under Section 24 of the Nature Conservation Ordinance 4 of 1975. This ordinance requires a conservancy to be composed of a committee which, is elected by their members. Overall, communal conservancies are self-governing, democratic entities, run by their members, with fixed boundaries that are agreed with adjacent conservancies, communities or landowners. Conservancies are recognised by the MEFT, but not governed by the Ministry, which does, however, have powers to de-register a conservancy if it fails to comply with conservation regulation¹. Wildlife in the conservancies is managed through a wildlife management plan. Like many legal financial entities, conservancies conduct annual general meetings and prepare financial reports².

1.4 Human Wildlife Conflict (HWC) Challenge in Conservancies

The Community-Based Natural Resource Management (CBNRM) initiative has led to the remarkable recovery and increase in wildlife populations, including key predator species and internationally threatened or endangered species such as elephants and black rhinoceros³. However, this increased wildlife population resulted into their expanded foraging ranges into

¹ Nature Conservation Ordinance 4 of 1975

² <u>https://www.meft.gov.na/services/conservancies/193/</u>

³ Republic of Namibia: Revised National Policy on Human Wildlife Conflict Management 2018-2027

communal and freehold farming arear resulting in an increased frequency and severity of Human Wildlife Conflict (HWC) especially involving elephants, feline predators, crocodiles and hippopotamus⁴⁵.

The conflicts include damage to crops, gardens and infrastructure (water points, fences, kraals, boreholes, etc.), loss of life or injuries to people and livestock mortalities. The situation is further complicated by climate change impacts on arid ecosystems, where limited environmental resources have intensified competition between livestock and wildlife populations for essential resources, particularly grazing areas and water sources.

To address these challenges, several mitigation strategies have been implemented, including the establishment of zonation systems in conservancies. These systems designate specific areas for farming, multiple-use activities, and dedicated wildlife zones for tourism and trophy hunting. Additional protective measures include enhanced livestock management through supervised herding, secure nocturnal enclosures, and the installation of protective infrastructure around gardens and water facilities.

2 WUPARO CONSERVANCY

Wuparo Conservancy was officially registered in December 1999. It covers an area of 148 km² and has a population of 987 people.

2.1 Location

⁴ Brian T. B. J and Jonathan I. Barnes 2006., Human Wildlife Conflict Study Namibian Case Study

⁵ Ailla-Tessa Nangula Iiyambula 2021., Identifying the Spatio-Temporal Distribution and Drivers Of Human-

Carnivore Conflict In Epupa And Okanguati Conservancies, Erongo Region Namibia

The Wuparo conservancy is situated in the southern eastern part of Zambezi Region. It lies between Mudumu National Park in the north and Nkasa Rupara National Park in the south. Additionally, it borders Dzoti Conservancy in the east and Balyerwa Conservancy in west.

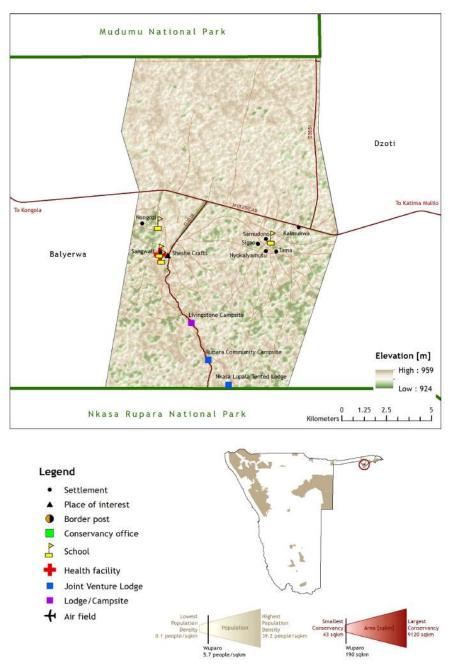


Figure 1. Map of Wuparo Conservancy (Source: NACSO, 2022)

The proposed borehole will be drilled at Mubana GPS coordinate -18.25083333°S, 23.63666667⁰ E (*See Figure 2 below*).



Figure 2. Borehole site at Mubana Village, Wuparo Conservancy

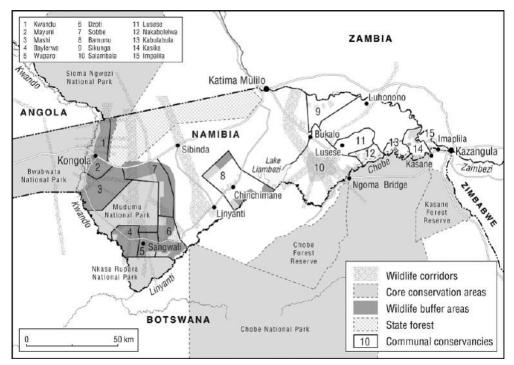


Figure 3. Conservancies in Zambezi Region

2.2 Physical Characteristics

Generally, the conservancy has a flat topography, made up of relatively thick forest Figure 4.



Figure 4. Area physical characteristics at Mubana Village (Source: Red-Dune Consulting 2024)

2.3 Support from Community Conservation Fund of Namibia (CCFN)

2.3.1 Human Wildlife Conflict (HWC)

Nestled between two national parks, the Conservancy is a migratory route to key wildlife animals including elephant, hyenas, lions, leopards, and wild dogs which destroy crops and attack livestock.

The charts in **Figure 5** below shows the type and total number of human wildlife conflict incidents each year, subdivided by species, grouped as herbivores and predators.

- A, total number of incidents each year, subdivided by species, grouped as herbivores and predators,
- **B**, the number of incidents per species for the last 3 years; the darkest bar (on the right) indicates the current year for each species

• **C**, the number of incidents per category for the last 3 years; the darkest bar (on the right) indicates the current year for each type.

It shows that, most HWC incidences are destruction of crops by herbivores (elephants, and antelopes), while hyenas and lions are responsible for livestock losses.

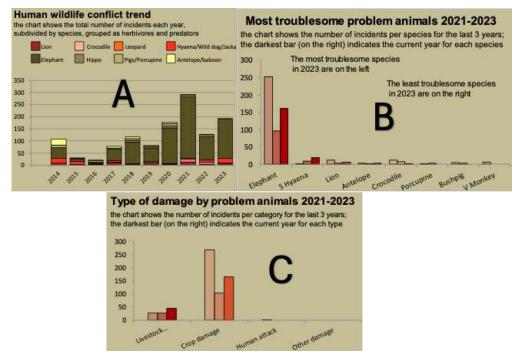


Figure 5. Total number of HWC incidents each year, subdivided by species and type of conflict (NACSO, 2022).

2.3.2 Mitigation of HWC

It has been observed that livestock loss frequently occurs when they access water points. In response, the Conservancy, through a proposal to CCFN, has requested assistance to develop and establish safer water access points to mitigate human-wildlife conflict by providing alternative, safe water supply points.

2.3.3 Support from Community Conservation Fund of Namibia (CCFN)

With financial support from the German Government through the KfW Development Bank, CCFN is implementing a project, *"Poverty Oriented Support to Community Conservation in Namibia"*. The project's main objective is to contribute to biodiversity conservation and rural development

through the establishment of sustainable Human-Wildlife-Conflict (HWC) management systems in Namibia's communal conservancies. In line with the project objectives, CCFN is supporting the Sheya Shuushona Conservancy in drilling a borehole in the Iitapa area for the community.

This intervention speaks to the project's objective of (i) working together with CBNRM partners⁶ to develop and institutionalize long-term mechanisms and structures that make management of HWC part of the sustainability strategy of CBNRM (ii) providing targeted conservancies with the means to address the HWC challenges they face in line with the National Policies of Namibia, which is of relevance to this proposed intervention.

3 STATUTORY REQUIREMENTS

The protection of the environment is enshrined under Article 951 of the Namibia Constitution. The Environmental Management Act (Act No 7 of 2007) (EMA) and its Environmental Impact Assessment Regulation 2012, has listed Water Resource Developments activities not to be undertaken without an Environmental Clearance Certificate (ECC) as follows.

- a) 8.1 The abstraction of ground or surface water for industrial or commercial purposes
- b) 8.2 The abstraction of groundwater at a volume exceeding the threshold authorised in terms of a law relating to water resources.

To comply with these statutory requirements, Red-Dune Consulting CC (RDC) was appointed to develop an Environmental Management Plan (EMP) for the drilling of the borehole. In addition to the EMA, other statutory requirements must also be fulfilled. The Ministry of Agriculture, Water, and Land Reform, as the custodian of the Water Resources Management Act (No. 11 of 2013), requires that a permit be obtained prior to the commencement of any borehole drilling activities.

⁶ IRDNC

4 TERMS OF REFERENCE

The scope to develop this EMP is guided by the Terms of References as provided in the EIA Regulation 2012, Section 9 (a-b) but, not limited to the following;

- Provide a comprehensive description of the proposed Project;
- Identify relevant legislation and guidelines for the project;
- Identify potential environmental (physical, biological and social) conditions of the project location and conduct risk assessment;
- Inform Interested and Affected Parties (I&APs) and relevant authorities about the proposed project to enable their participation and contribution;
- Develop an Environmental Management (EMP) that would be a legal guideline for the environmental protection by the project.

5 THE PROPONENT

Wuparo Conservancy is the proponent for this application with financial support from CCFN.

6 UNDERGROUND WATER IN ZAMBEZI REGION

The aquifers in the Zambezi region are known to have a thickness of up to 125m, formed by coarse grained, semi-consolidated to consolidated sandstone with underlying layer of basal / brackish to saline water **Figure 6**⁷.

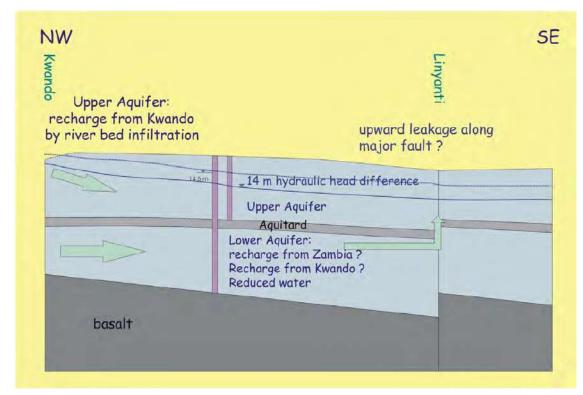


Figure 6. Schematic Concept showing the Structure of the Aquifer System in the Eastern Caprivi (Groundwater Investigations in the Eastern Caprivi Region, Main Hydrogeological Report pp46)

⁷ Groundwater Investigations in the Eastern Caprivi Region, Main Hydrogeological Report pp46

7 PROJECT ALTERNATIVES

The EMA) requires an impact assessment to explore various project alternatives, ensuring that the chosen project component does not have a significant negative impact on the environment. Project alternatives can range from not implementing the project at all (the "no-go" alternative), particularly when environmental impacts are severe or there is a high degree of uncertainty. Other alternatives may involve changes to the project site, technology, or equipment to be used. The description of alternatives is given below.

7.1 No-go alternative

If a "no-go" option is considered, it would mean that the current situation would remain unchanged. During drought, HWC could escalate, potentially leading to greater challenges for the communities living within the conservancy and the surrounding areas. As HWC intensifies, the negative impact on both the local environment and the livelihoods of the people could undermine the conservation efforts in place.

Additionally, the cost-benefit balance of the conservation incentives provided to conservancy members could be threatened, as increased conflict with wildlife may reduce the perceived benefits of participating in conservation activities. This could discourage ongoing community engagement and cooperation, which are essential for the long-term success of conservation initiatives. Ultimately, the failure to address HWC could hinder the effectiveness of conservation strategies and destabilize the environmental and economic gains made by the conservancy members.

7.2 Alternatives

Generally, a combination of alternatives to drilling could be considered. These include rainwater harvesting and aquifer recharge, which can provide a more resilient and sustainable approach to water resource management. Ultimately, a holistic approach will need to be implemented, one that incorporates the use of renewable energy and the adoption of water conservation measures to ensure water security while protecting the environment.

8 DESCRIPTION OF THE RECEIVING ENVIRONMENT

8.1 Populational demography

The 2023 population census indicated that Zambezi region has total population of 142 373 people. Overall, 61% of the region population makes up the labour force whereby 62% and 32% of the labour force is employed and unemployed respectively. The region has 8 electoral constituencies as presented in **Table 1** below. Wuparo Conservancy falls within Linyati Constituency.

Table 1. Population distribution in constituencies of Zambezi Region (Census 2023)

Zambezi	142 373	
Judea Lyaboloma	8 738	
Kabbe North	12 253	
Kabbe South	11 345	
Katima Mulilo Rural	24 016	
Katima Mulilo Urban	46 401	
Kongola	12 069	
Linyanti	10 425	
Sibbinda	17 126	

The average household size in the Zambezi Region was 4.4 people/household in 2015⁸, with a relatively young population of approximately 39% of the total population to be less than 15 years old. Officially, employment rate for Zambezi Region is 62%⁸, which is closely like the national average of 63.1%. Most of the employable adults are engaged in the category of agriculture, forestry, and fishing as the main sources of household income. Tourism and wildlife management are an important growing component of the economy, providing jobs through accommodation establishments and conservation work.

8.2 Socio-economic profile

⁸ Namibia Statistics Agency.2015. Namibia Household Income and Expenditure Survey Report

The community of Wuparo Conservancy are mostly subsistence farmers who rear crops and livestock. Tourism is one of the main incomes generating activity for the conservancy through trophy hunting concession. Often, meat from trophy hunting is distributed to residents.

8.3 Regional Geology and Topography

According to Mendelsohn *et al 2002*, Zambezi Region is formed up of the Kalahari Basin. The Kalahari Basin was formed from the split between Namibia and South America to form a broad coastal plain which is now the Namib Desert. The Kalahari Basin gradually filled up with sand and water borne deposit. These deposits of sands, clay and calcrete formed the Kalahari Group.

The soils are fluvisols that are derived from river deposits, and these loamy soils vary locally in the proportions of clay (distributed in the areas which experience frequent flooding) and sand (found mainly in the non-flood prone areas). While soils are naturally fertile and suitable to a range of crops, the sandy parts have poor soils with rather low nutrient levels, like other soils in the Kalahari Sandveld⁹.

Generally, the Zambezi region is flat and sloping toward the eastern direction. This is because, the geology of the area was formed from the filling up of the coastal plain with Namib sand and water borne deposits. Flooding is frequent in the region because of direct rainfall and rise in the Zambezi River from Angolan inflows.

The lithology of the aquifer in surrounding areas is not well known. The geohydrology indicates that the aquifers are found in Kalahari Deposits where soils are clayey loam with low infiltration potentials and faced with evaporation rates higher than rainfall which consequently causes low potential of ground water recharge.

⁹ Mendelsohn, J., Jarvis, A., Roberts, C., Robertson, T. (2002). Atlas of Namibia. A Portrait of the Land and its People. Cape Town (David Philip Publishers; New Africa Books (PTY) Ltd)

8.4 Climate

8.4.1 Rainfall

Generally, Namibia is an arid country, with a large part of country having a climatic condition characterized by high temperatures and, periodic low rainfall. Rainfall decrease from east to west, with Zambezi Region receiving the highest rainfall of 600ml/year to less than 25 ml in the Southwest and West of the country. The country experiences high climatic variability in the form of persistent droughts unpredictable and highly variable rainfall patterns, temperatures and

Vuparo

High solar radiation, low humidity and high temperatures lead to very high evaporation rates, which vary between 3800 ml per annum in the south to 2600 ml per annum in the north. In many areas, potential evaporation is about five times greater than the average rainfall. Surface water sources such as dams are subject to high evaporation rates.

(2021 / 2022 Season) hest average rainfall of about 600 mm which is like that of Wuparo Conservancy Figure 7.

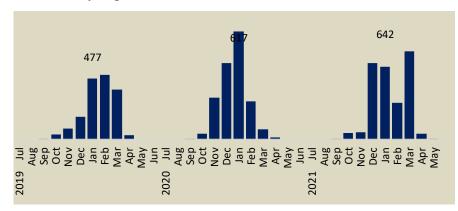


Figure 7: Rainfall trends in Wuparo Conservancy (Source: NACSO)

The Zambezi region's climatic condition is influenced by the Zambezi River, that of tropical nature with warm to hot temperatures. The warmest temperatures are from September to March, and the coldest between May to August. The dry season fall between April and October while the wet season falls between November and March. The region is known to experience frequent flooding. According to Mendelsohn et al 2002, the average summer temperature is 20°C while during winter the average temperature is 5 °C and the average maximum and minimum annual temperature is 35 °C and 19 °C respectively.

8.5 Biodiversity

8.5.1 Flora

Zambezi region is the most densely vegetated region in Namibia. Due to its tropical nature, the areas has a tropical forest covered by thick bush, shrubs mature trees which are predominantly Rose Wood and various species of Acacia trees and tall glass in the floodplain while non-flooded areas have trees of mopane (*Colophospermum mopane*), *Burkea Africana* and *Terminalia sericea*. Wuparo Conservancy is dominated by broad-leafed trees and shrub savannah.

8.5.2 Fauna

Bordering two national parks, the conservancy is home to a diversity of keystone wildlife species. Major wildlife includes Lion, elephant, leopard, buffalo, waterbuck, tsessebe, kudu, duiker, reedbuck, common impala, blue wildebeest, lechwe, hippo, crocodile, plains zebra, warthog, steenbok, high diversity bird species, various fish species in the Linyati River ¹⁰.

8.6 Surface Water

¹⁰ NACSO 2022

The primary surface water in Namibia is found in dams in Ephemeral Rivers and Perennial Rivers which have a potential of 200 Mm³ and 1,105Mm³ per annum respectively. The Ephemeral Rivers in the interior flow during the raining season, where western flowing rivers drains into the Atlantic Ocean, Fish River drains into Orange River, Cuvelai system, which is not a defined River system but rather Iishanas or flood plain drains into Etosha Pan and partially contribute to Kavango, Kwando and Zambezi River.

Perennial River, which has permanent flow are all found on the border of the country. Zambezi in the northeast has a mean annual flow of 40,000 Mm³, its flow per second, 180Mm³, is about twice the overall Dams capacity in Namibia at 100Mm³. The Kwando / Linyati / Chobe has an annual flow of 10,000Mm³, Kunene 5,500Mm³ and Orange River with 11,000Mm³ flow. Wuparo Conservancy mostly depends on the Linyanti River for surface water.

8.7 Ground Water

Namibia highly relies on ground water. About 50-60% water is ground water which has a potential yield of 360Mm³. Geologically, the main aquifers are the Karst, Otjwarongo, Omaruru Delta (OMDEL), Lower Kuiseb, Windhoek, Stampriet, Koichab and Ohangwena II. Groundwater quality in much of the Zambezi Region is generally good, especially within 5-20 km from the rivers, which recharge the aquifers¹¹.

8.8 Land use

The conservancy is zone into various uses as shown in figure 8 below.

¹¹ Groundwater Investigations in the Eastern Caprivi Region, Main Hydrogeological Report

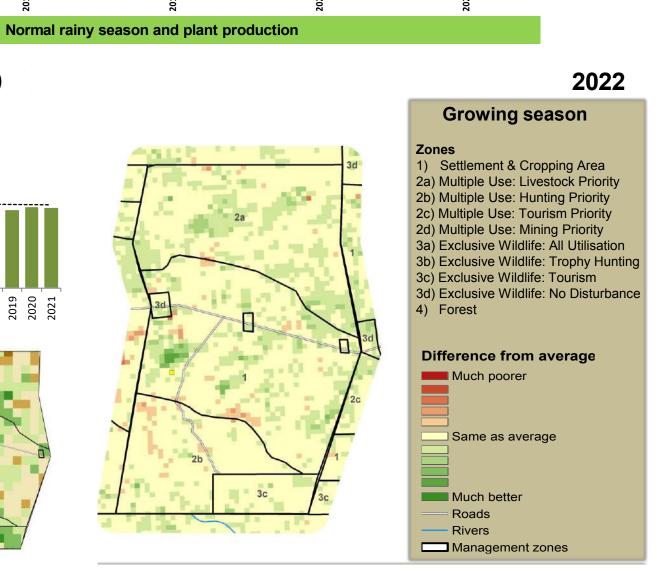


Figure 8. Conservancy Zones (Source: NACSO, 2022)

nt in 2021

20

area - July

- December

9 THE NEED AND DESIRABILITY OF THE PROJECT

30 7

The project aligns with the objectives of the Community-Based Natural Resource Management (CBNRM) programme, specifically in addressing the challenges of HWC while promoting wildlife confervation and fostering poverty reduction. By creating a sustainable solution to mitigate HWC, being of local comp the project suppo he v ies provides long-term conservation 2018 2021 2022 2020 2017 019 incentive 5 -10

Fur**29** ermore, the project contributes to the broader goals of Namibia's Integrated Water Resource Management (IWRM) framework. IWRM is designed to ensure the sustainable management of the country's water resources, balancing the needs of social equity, economic efficiency, and

nplementation of this borehole in the Iitapa area demonstrate

Normal forage availability

the IWRM principles by addressing water scarcity in rural communities while ensuring that water resources are used in a way that supports both human and ecological needs.

10 POLICY AND LEGAL FRAMEWORK

Namibia has developed a comprehensive set of policies, regulatory frameworks, and institutions designed to ensure the conservation, sustainable use, and equitable sharing of natural resources, biodiversity, and ecosystems *(Table 2)*. These efforts are in alignment with both international conventions and national legislation. In addition to its domestic policies, Namibia is a signatory to several international treaties, conventions, and multilateral agreements, which further guide its environmental governance. The country actively participates in various international standards, such as the United Nations Development Programme's Social and Environmental Standards (UNDP's SES) and engages in reviews and processes that are critical to the sustainable management of natural resources and the protection of basic rights, including access to a clean and healthy environment.

Legislation	Relevant authority	Applicability
The Namibia	Government	The Namibian constitution is the supreme law of the country and makes
Constitution	Republic of Namibia	provision for environmental protection and sustainable development.
Environmental	Ministry of	The environmental management act No.7 of 2007 aims to promote the
	Environment,	sustainable use of natural resources and provides the framework for the
Management Act No. 7 of 2007	Forestry and	environmental and social impact assessment, demands precaution and mitigation
01 200 /	Tourism	of activities that may have negative impacts on the environment and provision
		for incidental matters. Furthermore, the act provides a list of activities that may
		not be undertaken without an environmental clearance certificate.

Table 2. Policy and Legal Framework

Legislation	Relevant authority	Applicability
		The Environmental Assessment Policy for Sustainable development and
		Environmental Conservation emphasize the importance of environmental
		assessments as a key tool towards implementing integrated environmental
Environmental	Ministry of	management. Sets an obligation to Namibians to prioritize the protection of
Assessment Policy	Environment,	ecosystems and related ecological processes.
(1995)	Forestry and	The policy subjects all developments to environmental assessment and provides
	Tourism	guideline for the Environmental Assessment. The policy advocates that
		Environmental Assessment take due consideration of all potential impacts and
		mitigations measures should be incorporated in the project design and planning
		stages (as early as possible).
Pollution Control and	MEFT, MHSS and	The Pollution Control and Waste Management Bill, intents to regulate and
Waste Management Bill	others	prevent the discharge of pollutants into the air and water as well as providing for
(in preparation)		general waste management.
	Ministry of Health	The Public Health Act aims to protect the public from nuisance and states that no
Public Health Act (Act	and Social Services	person shall cause a nuisance or shall suffer to exist on any land or premises
No. 36 of 1919)		owned or occupied by him or of which he is in charge any nuisance or other
		condition liable to be injurious or dangerous to health.
Water Resources	Ministry of	This Ast married a framework for managing mater assessed to the the
Management Act (Act	Agriculture, Water	This Act provides a framework for managing water resources based on the
No. 11 of 2013)	and Land Reform	principles of integrated water resources management. It provides for the
		management, development, protection, conservation, and use of water resources.

Legislation	Relevant authority	Applicability
		Therefore, water abstraction should satisfy the provisions of the water act (water
		abstraction / borehole permit should be applied from the respective ministry).
		This act states that, all water resources belong to the State. It prevents pollution
		and promotes the sustainable utilization of the resource. To protect these
	Ministry of	resources, this act requires that permits are obtained when activities involve the
Water Act No, 54 of	Agriculture, Water	following:
1956	and Land Reform	(a) Discharge of contaminated into water sources such as pipe, sewer, canal, sea outfall and
		(b) Disposal of water in a manner that may cause detrimental impact on the water resources
Soil Conservation Act	Ministry of Agriculture, Water	This act promotes the conservation of soil, prevention of soil erosion. Prevent
No. 76 of 1969	and Land Reform	soil salinification.
National Heritage Act	Ministry of Urban	The Act makes provision for the protection and conservation of places and
National Heritage Act No. 27 of 2004	and Rural	objects of heritage significance and the registration of such places and objects.
110. 27 01 2004	Development	Part V Section 46 of the Act prohibits removal, damage, alteration or excavation
		of heritage sites or remains, while Section 48 sets out the procedure for
		application and granting of permits.
Regional Councils Act,	Ministry of Urban	The Deciencel Councils A at legislates the establishment of Deciencel Councils that
1992 (Act No. 22 of	and Rural	The Regional Councils Act legislates the establishment of Regional Councils that are responsible for the planning and coordination of regional policies and
1992)	Development are responsible for the planning and coordination of	

Legislation	Relevant authority	Applicability
		development. The main objective of this Act is to initiate, supervise, manage and
		evaluate regional development.

11 PUBLIC CONSULTATION

Section 21 of the EIA Regulation requires the undertaking of an Environmental Impact Assessment (EIA) to follows a robust and comprehensive public consultation. This is an important process, because it gives members of the public, especially the Interested and Affected Parties to comment or raise concerns that may affect their socio-economic or general environment because of the project. Further, it solicits crucial local knowledge that the Environmental Assessment Practitioner may not have.

The Public Participation Process (PPP) was focused on members of the conservancy. While competent and or regulatory authority such as Ministry of Environment Forestry and Tourism (MEFT), Ministry of Agriculture Water and Land Reform (MAWLR), where consulted during the project development phase for application for the ECC.

11.1 Mubana Village Consultation

A community meeting for Mubana Village was held on 28 September 2024 at Mubana Sub-Khuta (*see Figure 9 below*).



Figure 9. A community meeting for Mubana Village was held on 28th September 2024 at Mubana Sub-Khuta *(Source: Red-Dune Consulting, 2024)*

- The meeting was attended by 26 people with higher women representation (see Appendix A).
- Mr. Savage Simulebu of Red-Dune presented the background of CCFN support for the conservancy. He informed attendees that the proposed development of water points was a response to the conservancy's request for assistance in addressing the challenges of human-wildlife conflict (HWC). He assured the participants that the proposed water development is a community project and that no land would be allocated to individuals or institutions.
- He outlined the meeting objectives, particularly emphasizing the requirement for Environmental Social Safeguards (ESS) and the necessity for environmental impact assessments and community consultations.
- Attendees were informed that the proposed water point will be developed with funding from the Community Conservancy Fund of Namibia (CCFN), which received support from the KfW Development Bank to assist communal conservancies in mitigating HWC issues.
- KfW requires that funds be spent wisely and accounted for, ensuring that project implementing agencies adhere to the highest standards of Environmental and Social Safeguards (ESS) to promote environmental and social sustainability.
- HE informed the meeting that ESS does not support projects if they involve any of the following red flags:
 - Displacement of people
 - Destruction of heritage sites
 - Damage to critical biodiversity habitats
 - Causing conflict within communities
- Additionally, the meeting was informed that the proposed site must not be on occupied land.
- Participants were reminded that environmental protection is mandated under the Environmental Management Act (Act No. 7 of 2007) (EMA) and its Environmental Impact Assessment Regulation (2012), which states that water resource development activities, such as drilling boreholes, cannot proceed without an Environmental Clearance Certificate (ECC).
- To obtain an ECC, a Social and Environmental Impact Assessment must be conducted, which is a core component of the consultation process.
- Finally, it was explained that a consent letter is required for project implementation. This letter, known as 'Free Prior Informed Consent' (FPIC), represents the community's understanding and

agreement to the proposed water development project. The components of FPIC were explained as follows:

- FREE: Consent is given voluntarily, free from coercion, intimidation, or manipulation.
- PRIOR: Consent is sought sufficiently in advance of any authorization or commencement of activities.
- INFORMED: The community is well-informed about the project and has access to all relevant information.
- CONSENT: A collective decision made by the rights-holders, reached through customary decision-making processes of the affected communities.
- Free Prior Informed Consent was verbally obtained from the attendees by a show of hands, and an FPIC letter was read to the community and signed by the area Induna (village headman) in the presence of the community (see Figure 10, Appendix B).



Figure 10. Consent from Mubana Community

Comments from the community included:

Key Issues Raised	Responses
How strong is the drinking point	The cattle trough will be built on rugged concrete slab,
facilities	to ensure safety of livestock
Will the community pay for water	No, they won't pay for water.
Will beneficials pay for securities to	No, the project will build anti-theft mechanism to ensure
protect the solar panels from theft	projection of borehole infrastructures.
How long will it take to obtain	It normally takes between three to four months,
environmental clearance certificate	however we will motivate for conditional approval to
	speed up the implementation time, since this is a
	community project.

• The Induna expressed gratitude to the project team, welcoming the project with enthusiasm and deep appreciation. The meeting adjourned with a prayer, followed by a site assessment with the community.

11.1.1 Site Assessment

• The borehole site is free of vegetation, surrounded by shrubs of acacia (see Figure 11).



Figure 11. Borehole Drilling Site, Mubana Village (Source: Red-Dune Consulting, 2024).

12 ENVIROMENTAL AND SOCIAL IMPACT ASSESSMENT

12.1 Introduction

This chapter outlines the potential impacts (negative and positive) associated with drilling the borehole. The identified impacts are categorized into three components: impacts on the biophysical environment; Impacts on the health and safety; and impacts on socio-economic. It further provide the criteria used for impact assessment. The developed Environmental Social Management Plan (ESMP) for the project is a living document. Hence, impacts that could be identified during future maintenance or upgrade of infrastructures will require an amendment to the ESMP.

12.2 Impact Identification

Potential impacts were identified in accordance with the key Environmental Social Indicators (ESI)¹² and using literature review, site assessment and public participation process and experience for Red-Dune Consulting (*see Table 3*).

Component	Impact		Description							
				Туре						
	CONSTRUCTION PHASE									
<u> </u>	Loss	of	The clearing of land for site preparation and the occupation	Negative						
nen	habitat	and	of the site itself can result in the direct loss of habitat for							
roni	Biodivers	sity	local flora and fauna. This may lead to a reduction in							
Unvi			biodiversity, as species that depend on the specific habitat							
cal F			may be forced to relocate or face potential extinction.							
nysia										
Bio-Physical Environment			Furthermore, the presence of construction activities and							
Bi			increased human activities can inadvertently create							

 Table 3. Impact identification

¹² Guidance Note UNDP Social and Environmental Standards Social and Environmental Assessment and Management July 2022

Component	Impact	Description	Impact
			Туре
		opportunities for poaching of high valuable species such as	
		Rhinos.	
	Dust	Land clearing, digging and excavation of trenches,	Negative
	emission	movement of vehicles and heavy machinery on project	
		sites, concrete work, transportation of sand to site and	
		concrete stones, cement mixing may create fugitive dust.	
		Uncoordinated / reckless driving on gravels roads could	
		cause low visibility to other road users.	
		Dust from construction and drilling can not only pose	
		health risks to workers, leading to respiratory issues, but it	
		can also affect nearby communities and vegetation,	
		reducing air quality and the overall environment's health.	
	Land	Site preparation activities, such as excavation and the	Negative
	degradation /	movement of heavy machinery, can result in soil	
	Soil erosion	disturbance and degradation. This includes compaction,	
		erosion, and loss of soil fertility. The removal of vegetation	
		during site clearing can also leave the soil vulnerable to	
		erosion, reducing the land's ability to support future	
		vegetation growth and impacting local ecosystems.	
	Noise and	The operation of heavy machinery and drilling equipment	Negative
	vibration	can produce significant noise, which may disturb both	
		wildlife and nearby communities. Prolonged exposure to	
		high noise levels can have detrimental effects on the health	
		of workers and the surrounding population, including	
		hearing loss and increased stress levels. Furthermore, noise	
		pollution can disrupt animal behaviours, particularly in	
		sensitive species, leading to displacement or changes in	
		habitat use.	

Component	Impact	Description	Impact		
			Туре		
	Traffic	The operation of vehicles and machinery, as well as	Negative		
	emission	drilling activities, can contribute to air pollution through			
		the emission of exhaust gases of SO_2 , CO_2 , CO , NO_x and			
		particulates.			
	Waste	Construction produce significant amount of solid waste	Negative		
	generation	including, building rubbles, plastic and parts of equipment.			
	Household	The generation of domestic solid waste from workers and	Negative		
	waste	operations on-site can lead to pollution if not properly			
		managed. Improper disposal of waste, such as plastics,			
		food scraps, and other materials, can contaminate the local			
	environment and pose a risk to both wildlife and human health.				
	Soil and	The use of heavy vehicles and drilling equipment involves	Negative		
	water	the use of oils, grease, and lubricants that, if not properly			
	pollution	managed, can leak into the ground and contaminate			
		groundwater sources.			
	Safety risk	Accidents from collision of construction vehicles, and	Negative		
		occupational injuries.			
	Health risks	Risks of hearing impairment from excessive noise,	Negative		
		respiratory risks from dust inhalation. New social			
>		relationships are often a recipe for spreading of			
afet		communicable diseases and sexually transmitted diseases			
nd S		such as HIV/AIDS. Furthermore, alcohol and drug use			
th a		could be prevalent during construction and workers are			
Health and Safety		susceptible to vector diseases such as malaria.			
		Furthermore, the bush working environment makes			
		workers to be prone to venomous insect and snake bites			
		which may lead to fatalities. Other health risk include			
		workers exposure to excessive noise and dust and injuries.			

Component	Impact	Description	Impact
			Туре
	Hazardous	Heavy vehicles consume significant amounts of oil, and	Negative
	Impact	the handling of hydrocarbons will occur on-site. The area	
		where grease, oils, lubricants, and fuel are managed must	
		be properly designed to prevent soil contamination, which	
		could potentially affect both the soil and underground water.	
	Visual	Poor housing keeping on site, disturbance of surrounding	Negative
	impacts	view by the height of the hospital, uncoordinated painting.	
	Employment	Namibia is facing high unemployment, particularly among	Positive
	creation	the youth. However, the project will create employment	
		opportunities during the construction phase and provide	
ent		valuable skills development and knowledge transfer.	
onm	Increase in	Construction provides an opportunity for local people,	Positive
Social Environment	local	especially women to sell their produce (food) to	
al E	economy	construction workers. The local economy will increase	
Soci		from procurement of construction materials and increased	
		buying power.	
	Heritage and	Digging and excavation have the potential to uncover	Negative
	Archaeologic	archaeological materials. Therefore, raising awareness	
	al Resource	about the possibility of chance finds is necessary to prevent	
		potential damage.	
		OPERATIONAL PHASE	
	Risk of	Uncontrolled underground water abstraction can lead to	Negative
-	underground	over-extraction, which depletes water resources faster than	
ctior	over-	they can be replenished. This over-abstraction can also	
stra	abstraction	result in the deterioration of water quality, as it may cause	
r ab	water	the intrusion of contaminants such as salts or pollutants	
Water abstraction		into freshwater aquifers. Additionally, excessive	
N N		extraction can disrupt the natural balance of groundwater	
		systems, affecting ecosystems and potentially leading to	
	1		

Component	Impact	Description	Impact
			Туре
		land subsidence or other environmental issues. Therefore,	
		it is crucial to implement sustainable water management	
		practices to protect both the quantity and quality of	
		underground water resources.	
es	Theft	Theft of boreholes infrastructures such as pumps and solar	Negative
ctur		panels.	
stru	Destruction	Potential destruction of boreholes and associated	Negative
nfra	of water	infrastructure by elephants.	
ole ii	infrastructure		
Safety of borehole infrastructures	by elephant		
ofbc	Corrosion of	The use of poor-quality borehole casing could lead to short	
ety .	borehole	lifespan of the borehole casing	
Saf	metal casing		
se	Claiming	The community near the borehole my claim ownership of	Negative
er us nitio	ownership of	the borehole which could cause conflict in the community	
wato	boreholes by		
Conflict of water use buy the communities	nearest		
nflic / the	community		
Coi buy	members		

12.3 Criterial for impact assessment

The criteria used to assess the impacts and the method for determining their significance are outlined in Table 4 below. This process aligns with international best practices and adheres to the Environmental Impact Assessment (EIA) Regulations under the Environmental Management Act of 2007 (Government Gazette No. 4878).

The core principle of the impact assessment follows a mitigation hierarchy, which aims to first avoid negative impacts through preventative measures, then minimize those impacts to acceptable levels, and, if neither of these options is feasible, to remedy or compensate for the impact.

Risk Event	Rating		Description of the risk that may lead to an Impact					
Probability	The probabil	lity that an	impact may occur under the following analysis					
	1		Improbable (Low likelihood)					
	2		Low probability					
	3		Probable (Likely to occur)					
	4		Highly Probable (Most likely)					
	5		Definite (Impact will occur irrespective of the applied					
			mitigation measure)					
Confidence	The confide	nce level	of occurrence in the prediction, based on available					
level	knowledge							
	L		Low = limited information					
	М		Medium = moderate information					
	Н		High = sufficient information					
Significance	Severity	Rating	None (Based on the available information, the					
	Negligible	1	potential impact is found to not have a significant					
			impact)					
	Low	2	Low (The presence of the impact's magnitude is					
			expected to be temporal or localized, that may not					
			require alteration to the operation of the project					
	Medium	3	Medium (This impact is probable, limited in scale,					
			expected to be of short term / temporary, can be					
			avoided, managed and or mitigated with simple					
			mitigation measures.)					
	High	4	High (The impact is definite, mostly predictable,					
			temporal, can be local, regional or national and in					
			long term and reversible. These are impacts that may					
			affect human rights, lands, natural resources,					
			traditional livelihood, critical ecosystem services. The					

Table 4. Criteria for Impact Assessment

Risk Event	Rating		Description of the risk that may lead to an Impact
			severity of these impact are more limited than sever
			impacts.)
	Severe	5	Severe (The impact is definite, it has significant
			adverse impacts on human population and or / the
			environment which are of large-scale magnitude and
			or spatial extend such as large geographic area, large
			number of people or transboundary nature. The
			impact duration is long term, permanent and often
			irreversible. Impacts include displacement of human,
			destruction of critical ecological systems and or
			cultural and heritage sites etc. The impact could have
			a no-go implication unless the project is re-designed
			or proper mitigation can practically be applied.)
Duration	Time duration	on of the in	npacts
	1		Immediate
	2		Short-term (0-5 years)
	3		Medium-term (5-15 years)
	4		Long-term (more than 15 years
	5		Permanent
Scale	The geograp	hical scale	of the impact
	1		Site specific
	2		Local
	3		Regional
	4		National
	5		International

12.4 Risk Assessment

The significance of the impact was determined using a risk matrix, as shown in Table 5. A fiveby-five matrix was applied, where the severity of the impact was categorized and assigned scores ranging from 1 to 5: Improbable (1), Low (2), Medium (3), High (4), and Severe (5). Similarly, the likelihood of the impact occurring was assigned scores as follows: Improbable (1), Low Likely (2), Probable (3), High Probability (4), and Definite (5). The overall impact rating was then calculated by multiplying the scores for impact severity and likelihood.

	5	5	10	15	20	25					
	Definite	Low	Medium	High	Severe	Severe					
00	4	4	8	12	16	20					
	High Probability	Low	Medium	High	High	Severe					
LIKELIHOOD	3	3	6	9	12	15					
	Probable	Low	Medium	Medium	High	High					
LIKI	2	2	4	6	8	10					
	Low	Low	Low	Medium	Medium	Medium					
	1	1	2	3	4	5					
	Improbable	Negligible	Low	Low	Low	Low					
		1 Negligible	2 Minor	3 Medium	4 High	5 Severe					
		IMPACT SEVERITY / CONSEQUENCE									
		Negligible	Low	Medium	High	Severe					

Table 5. Risk assessment matrix¹³

12.5 Mitigation Hierarchy

Best practises call for mitigation measures to follow a mitigation hierarchy that favours (i) avoidance of potential adverse impacts, and where avoidance is not possible, then (ii) minimization and reduction; where adverse residual impacts remain, then (iii) mitigation measures need to be applied, and, as a last resort, (iv) measures to offset impacts that cannot be appropriately mitigated (*see Figure 12 below*).

According to EIS regulations, the objectives mitigations are to;

- Find environmental ways of doing thing
- Promote environmental benefits of the project
- Avoid, Minimise or remedy negative impacts and
- Ensure that residual negative impacts are within acceptable levels,

¹³ Risk Management Guideline for the BC Public Sector (Province of British Columbia Risk Management Branch and Government Security Office 2012)

Furthermore, during consideration of the mitigation measure, the following mitigation hierarchy was followed.

- Avoid the negative impact through preventative means,
- Minimise the negative impacts to acceptable low levels and,
- If the above two are not possible, remedy or compensate the impact.

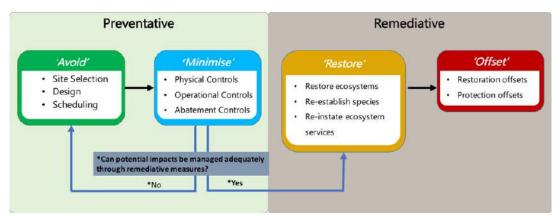


Figure 12. Mitigation Hierarchy Source ¹⁴

12.6 Siting Phase: Impact Assessment

Typically, before drilling of a borehole, a site assessment undertaken to determine the optimum location for drilling a process called siting of a borehole. This process involve analysis of geohydrology property of the area using two main conventional methods; (i) electrical resistivity and (ii) ground conductivity. These methods use Frequency Domain Electromagnetic (FDM) operated by a highly trained geohydrologist.

During this phase, there will be no evasive activities that could cause harm to the physical environment. To ensure social cohesion with the siting team, it will be required for the locals, particularly the traditional authorities to be informed about the presence of the siting team in the area. This activity is usually undertaken by two people, who will carry handheld FDM. The sited location will be pinned for marking purposes.

¹⁴ Cross-Sector Biodiversity Initiative (CSBI). (2015). A Cross-sector Guide for Implementing the Mitigation Hierarchy (p.9)

12.7 Drilling Phase: Impact Assessment

Drilling is the primary and most significant environmental threat during this phase. This stage involves the mobilization and transportation of drilling equipment to the drilling site, the construction of protective fences around boreholes, and the installation of solar panel platforms. If necessary, a campsite may be set up at the drilling site, complete with supporting infrastructure such as ablution facilities, and provisions for managing household and other solid waste.

During this phase, various occupational health and safety risks arise, including injuries from operating machinery, bites from insects (such as mosquitoes), snake bites, and the potential for oil contamination. Table 5 below outlines the assessment of potential impacts and the proposed mitigation measures for the drilling phase.

Project- Environment Interaction	Description	Mitigation Measures	Impact type	Likelihood occurrence	Severity	Impact Rating	Geographical Extend	Duration	Reversibility (R)	Significance	Confidence Level
Employment /	Possible exclusion of	1. Ensure that all	+ve	2	2	4	nal	ect	n/a	OW	High
Socio-	local communities from	general work is					Regional	project		Γ	
Economic	job opportunities and	reserved for local					R	of			
advancement	unfair compensation of	people, unless						Life			
of local	workers. It is not	specialized skills									
	anticipated that a	are required.									

Table 6. Social Environment: Impact Assessment

Project- Environment Interaction	Description	Mitigation Measure	Impact type	Likelihood occurrence	Severity	Impact Rating	Geographical Extend	Duration	Reversibility (R)	Significance	Confidence Level
	significant number of		fair								
	jobs will be created	compensation									
	during the drilling	practices	and								
	phase.	adhere	to								
		Namibian Lab	our								
		Laws.									
		3. Facilitate s	kill								
		transfer to lo	ocal								
		workers.									
		4. Use lo	ocal								
		suppliers	for								
		goods	and								
		_	ere								
		possible.									

Project-	Description	Mitigation Measures									'el
Environment			e			ing	cal		ty (F	e	Lev
Interaction			typ	ood	N	Rat	phia	E	lbillid	anc	ence
			Impact type	Likelihood occurrence	Severity	Impact Rating	Geographical Extend	Duration	Reversibility (R)	Significance	Confidence Level
			Im	Lib	Ser	Im	Ge Ex	Du	Re	Sig	Co
Health and	Job opportunities can	1. Raise awareness	-ve	2	2	4	cal	uoi	n/a	Low	Hig
Safety for	lead to new social	among employees					1 Lo	urati		Ĺ	h
Employees and	relationships that may	about the dangers					c and	ct D			
the General	contribute to the spread	of HIV/AIDS,					Site Specific and Local	Project Duration			
Public	of diseases, particularly	alcohol, and drug					s Spe	<u>д</u>			
	pandemics such as	abuse.					Site				
	HIV/AIDS, and	2. Provide condoms									
	substance abuse. Hiring	on-site.									
	unlicensed employees to	3. Develop a									
	operate vehicles and	comprehensive									
	machinery poses safety	safety plan.									
	risks to themselves, co-	4. Ensure all									
	workers, and the public.	employees									
	Additionally, employees	undergo an									
	are exposed to dust,	induction course									
	noise pollution, and	on health and									
	other occupational	safety.									
	health and safety	5. All drivers must									
	hazards	possess									

Project-	Description	Mitigation Measures									'el
Environment			a			ing	a		Reversibility (R)	6	Confidence Level
Interaction			typ	ood	x	Rat	phic	E	ibilid	anc	ence
			Impact type	Likelihood occurrence	Severity	Impact Rating	Geographical Extend	Duration	versi	Significance	nfide
			Im	Lik occ	Sev	Im	Ge	Du	Rev	Sig	Col
		appropriate									
		driver's licenses.									
		6. Install adequate									
		safety signage at									
		designated areas.									
		7. Provide personal									
		protective									
		equipment (PPE)									
		such as overalls,									
		safety boots,									
		safety eyewear,									
		gloves, and hard									
		hats.									
		8. Adhere to the									
		Labour Act,									
		ensuring non-									
		toxic dust									
		exposure levels do									
		not exceed									

Project-	Description	Mitigation Measures									/el
Environment			9			ting	cal		ty (F	e	Lev
Interaction			Impact type	Likelihood occurrence	Ŕ	Impact Rating	Geographical Extend	U	Reversibility (R)	Significance	Confidence Level
			pact	Likelihood occurrence	Severity	pact	Geogra] Extend	Duration	vers	gnifi	nfid
				Lil 000	Se	Im	Ge Ex	Du	Re	Sig	C
		5mg/m ³ for									
		respiratory dust									
		and 15mg/m ³ for									
		total dust.									
		9. Ensure noise									
		levels do not									
		exceed 85dB(A)									
		over an 8-hour									
		period.									
		10. Comply with the									
		Occupational									
		Health and Safety									
		Act of Namibia									
		and other									
		international Abor									
		standards (e.g.,									
		ILO).									
		11. Ensure first aid									
		kits are available									

Description	Mitigation Measures										/el
		0				ting	cal		ty (F	0	Lev
		t typ	poor	ence	X	t Rat	aphio	u	ilidi	canc	ence
		Ipaci	kelik	curr	verit	Ipaci	eogr:	ırati	vers	gnifi	Confidence Level
		In	Li	00	Se	In	Ex	Dı	Re	Sig	CC
	on-site, including										
	supplies for insect										
	and snake bites.										
	12. Train supervisors										
	in occupational										
	health and first										
	aid.										
	13. Supply clean										
	drinking water,										
	such as portable										
	water tanks.										
	14. Use gendered										
	mobile toilets.										
	15. Provide insect										
	repellent,										
	mosquito nets,										
	and, if necessary,										
	immunization to										
	prevent diseases										
	Description	 on-site, including supplies for insect and snake bites. 12. Train supervisors in occupational health and first aid. 13. Supply clean drinking water, such as portable water tanks. 14. Use gendered mobile toilets. 15. Provide insect repellent, mosquito nets, and, if necessary, 	on-site, including supplies for insect and snake bites. 12. Train supervisors in occupational health and first aid. 13. Supply clean drinking water, such as portable water tanks. 14. Use gendered mobile toilets. 15. Provide insect repellent, mosquito nets, and, if necessary, immunization to	of type dupon-site, including supplies for insect and snake bites.12. Train supervisors in occupational health and first aid.13. Supply clean drinking water, such as portable water tanks.14. Use gendered mobile toilets.15. Provide insect repellent, mosquito nets, and, if necessary, immunization to	Officient Officient Officient on-site, including supplies for insect and snake bites. Image: Supplies for insect and snake bites. 12. Train supervisors in occupational health and first aid. Image: Supply clean drinking water, such as portable water tanks. 13. Supply clean drinking water, such as portable water tanks. 14. Use gendered mobile toilets. 15. Provide insect repellent, mosquito 15. Provide insect repellent, mosquito and, if necessary, immunization Image: Supply clean drinking	on-site, including supplies for insect and snake bites. on-site, including supplies for insect and snake bites. 12. Train supervisors in occupational health and first aid. Image: Comparison of the test of te	odoodoodoodoodoon-site, including supplies for insect and snake bites.Image: Supplies for insect and snake bites.Image: Supplies for insect and snake bites.12. Train supervisors in occupational health and first aid.Image: Supply clean drinking water, such as portable water tanks.Image: Supply clean drinking water, such as portable mobile toilets.Image: Supply clean drinking water, such as portable water tanks.14. Use gendered mobile toilets.Image: Supply clean drinking water, such as portable water tanks.Image: Supply clean drinking water, such as portable water tanks.Image: Supply clean drinking water, such as portable water tanks.15. Provide insect repellent, mosquito nets, and, if necessary, immunization toImage: Supply clean drinking water, drinking water, drinking water, drinking water, mosquito nets, and, if necessary, immunization toImage: Supply clean drinking water, drinking water, d	on-site, including supplies for insect and snake bites.on-site, including supplies for insect and snake bites.ininininin12.Train supervisors in occupational health and first aid.13.Supplyclean drinking water, such as portable water tanks.In<	on-site, including supplies for insect and snake bites.on-site, including supplies for insect and snake bites.state state10	on-site, including supplies for insect and snake bites. on-site, including supplies for insect and snake bites. supplies for insect and snake bites. supply supply supplies 12. Train supervisors in occupational health and first aid. Image: Supply Image: Supply	odd, juli juli odd, juli juli odd, juli juli<

Project- Environment	Description	Mitigation Measures				50	_		(R)		level
Interaction			Impact type	Likelihood occurrence	Severity	Impact Rating	Geographical Extend	Duration	Reversibility (R)	Significance	Confidence Level
		like malaria.									
Heritage and	Potential unearthing of	1. Employee must be	-ve	2	2	4	ific	on / ling	R	Low	High
Archaeology	archaeological material or damaging heritage resources	trained on the possible find of heritage and					Site Specific	Construction / Drilling		Γ	

Project-	Description	Mitigation Measures									/el
Environment			9			ting	cal		ty (F	0	Lev
Interaction			typ	ood	N	Rat	hphic _	u	ibili	canc	ence
			Impact type	Likelihood occurrence	Severity	Impact Rating	Geographical Extend	Duration	Reversibility (R)	Significance	Confidence Level
			Im	Lil	Ser	Im	Ge Ex	Du	Re	Sig	Co
		archaeological									
		material in the									
		area;									
		2. Implement a									
		chance find and									
		steps to be taken									
		for heritage and									
		archaeological									
		material finding									
		(Heritage (rock									
		painting and									
		drawings), human									
		remains or									
		artefacts) are									
		unearthed									
		3. Stopping the									
		activity									
		immediately									
		i. Informing the									

Project-	Description	Mitigation Measures										'el
Environment			e				ling	cal		ty (R	9	Lev
Interaction			Impact type	poor	occurrence	×.	Impact Rating	Geographical Extend	u	Reversibility (R)	Significance	Confidence Level
			pact	Likelihood	curre	Severity	pact	Geogra _l Extend	Duration	vers	nifi	nfid
			Im	Lil	000	Ser	Im	Ge Ex	Du	Re	Sig	Co
		operational										
		manager or										
		supervisor										
		ii. Cordoned of										
		the area with a										
		danger tape and										
		manager to take										
		appropriated										
		pictures.										
		iii.										
		Manager/super										
		visor must report										
		the finding to the										
		following										
		competent										
		authorities,										
		National Heritage										
		Council of										
		Namibia (061 244										

Project- Environment Interaction	Description	Mitigation Measures	Impact type	Likelihood occurrence	Severity	Impact Rating	Geographical Extend	Duration	Reversibility (R)	Significance	Confidence Level
		 375) National Museum (+264 61 276800) or the National Forensic Laboratory (+264 61 240461). 									

Project-	Description	Mitigation Measures									/el
Environment			e			ting	cal		ty (F	e	Lev
Interaction			Impact type	Likelihood	ity	Impact Rating	Geographical Extend	tion	Reversibility (R)	Significance	Confidence Level
			Impa	Likel	Severity	Impa	Geogra _] Extend	Duration	Reve	Signi	Confi
Biodiversity:	Destruction of	1. Avoid cutting down mature and	-ve	2	2	4	fic	50	R	Low	High
Flora	trees	protected plant species.					Site Specific	illing		Γ	Ηi
		2. Ensure that access roads are					ite S	/ Dr			
		rehabilitated after use to enhance					Ň	tion			
		revegetation						Construction / Drilling			
								Cons			
Biodiversity:	Destruction of	1. Do not kill animal, unless such	-ve	2	2	4	al		R	M	ţh
Fauna	animal habitats	animals pose eminent danger to					Regional	Construction / Drilling		Low	High
	such as bird nests,	humans					Re	u/D			
	poaching, stealing	2. There must be ZERO tolerance to						ctior			
	of livestock	poaching to ensure this, no weapon						ıstru			
		and traps are allowed on site;						Cor			
Surface and	Heavy vehicle	1. Fuelling of heavy vehicle on site	-ve	2	2	4	ific	ing	R	Low	High
Ground	and machinery	must be well coordinated at					Site Specific	Drill		Π	Н
Water	may pollute water	designated places,					Site	uo / uo			
Pollution	sources from	2. Stationary vehicles must be						uctio			
	leakages of oils,	provided with drip tray to capture						Construction / Drilling			
	hydraulic fluids,							Ŭ			

Table 7. Bio-Physical Environment: Impacts Assessment

Project-	Description	Mitigation Measures										/el
Environment			e				ting	cal		ty (F	e	Lev
Interaction			t typ	hood	rence	ity	et Rai	indri d	ion	sibili	icanc	dence
			Impact type	Likelihood	occurrence	Severity	Impact Rating	Geographical Extend	Duration	Reversibility (R)	Significance	Confidence Level
	lubricants and	oil, lubricants and hydraulic fluids										
	greases. These	leakages										
	pollutants may	3. All vehicle and machinery must be										
	reach	well service to avoid leakages										
	underground	4. Provide and train on oil spill										
	water through	emergency response										
	seepage. Further	5. Servicing of vehicles and machinery										
	surface water may	must take place at designate places										
	be polluted from											
	surface run off											
	soils that is											
	polluted.											
Waste	General	1. Provide skip bins to collect waste	-ve	2		2	4	fic	ect	R	Low	High
Generation	household	and be disposed of at an approved						Site Specific	Life of project		Γ	Hi
	pollution and	disposal site						ite S	e of			
	littering such as	2. Provide labelled household waste						Ň	Lif			
	used oil cans	drums for household solid waste.										
	drums, metals,	3. Do not burry waste on site										
	and household											

Project-	Description	Mitigation Measures									/el
Environment			e			ting	cal		ty (F	e	Lev
Interaction			Impact type	Likelihood occurrence	ly.	Impact Rating	Geographical Extend	u	Reversibility (R)	Significance	Confidence Level
			npac	kelił curr	Severity	npac	Geogra) Extend	Duration	evers	gnifi	onfid
			In	Li 00	Se	In	U A	Ď	R	Si	Ŭ
	solid and liquid	4. Excavate a small biodegradable									
	waste	waste site that would be dump									
		filled at the end of the project,									
		alternatively, provide mobile									
		toilets that will be disposed at an									
		approved site and ensure separate									
		ablution facilities for men and									
		women.									
		5. Used oil, grease and lubricants									
		cans must be collected in									
		appropriate drums and disposed of									
		at an approved site									
		6. Maintain good housekeeping on									
		site.									
		7. Do not burry waste on site									
Dust	Land clearing,	1. Movement of heavy vehicles must	-ve	2	2	4	ite fic	ate	R	Low	High
Pollution	digging,	strictly be restricted on site.					Local and Site Specific	Immediate		Γ	Hi
	excavation of						sal aı S _j	Imn			
	trenches, drilling,						Loc				

Project-	Description	Mitigation Measures										rel
Environment			e				ting	cal		ty (F	e	Lev
Interaction			t typ	hood	ence	ty	t Rat	aphio d	ion	sibili	icanc	lence
			Impact type	Likelihood	occurrence	Severity	Impact Rating	Geographical Extend	Duration	Reversibility (R)	Significance	Confidence Level
	movement of vehicles and heavy machinery	 Adhere to the minimum speed limit of 30 or 40km/hour when on farm roads. 										
	in site, transportation of material to site, will create fugitive dust which could be a nuisance to the surrounding.	 On site where soil is loosened by vehicle movement, apply dust a suppression method such as water spraying. During drilling, use water to suppress the dust 										
Land degradation and pollution	Uncoordinated movement of heavy vehicles and uncoordinated land clearing could lead to soil erosion. Possible	 Movement of heavy vehicles must be coordinated and restricted to be on access roads Normally, public gravel roads are meant for light vehicles drilling vehicles have the potential to damage the access roads. Hence proper road maintenance must be 	-ve	2		2	4	Site Specific	Life of project	R	Low	High

Project-	Description	Mitigation Measures									rel
Environment Interaction			ype	pc est		tating	hical		ility (R)	nce	ice Lev
Interaction			Impact type	Likelihood occurrence	Severity	Impact Rating	Geographical Extend	Duration	Reversibility	Significance	Confidence Level
			In	Li 00	Se	In	E	D	R	Si	Ŭ
	spill and leakages	implemented to ensure that the									
	of fuel and	roads are left on good state									
	lubricants from	3. Fuelling of heavy vehicles on site									
	vehicle and	must be well coordinated at									
	machinery could	designated places									
	pollute the soil	4. Servicing of vehicles and									
	and eventually the	machinery must take place at									
	ground water	designated sites									
	resource.	5. Stationary vehicles must be									
		provided with drip tray to capture									
		oil, lubricants and hydraulic fluid									
		leakages									
		6. All vehicles and machinery must									
		be well serviced to avoid leakages									
		7. Provide and train on oil spill									
		emergency response.									

12.8 Operational Phase:

The main activity during the operational phase of the borehole is water abstraction. If not properly monitored, this could lead to overabstraction, which may result in the deterioration of water quality and potential negative impacts on vegetation due to a deepening water table. Additionally, the borehole could lead to social conflicts, as surrounding communities might claim ownership of the borehole and prevent other communities from accessing it. Table 8 below outlines the potential impacts during the operational phase and the proposed mitigation measures.

Table 8. Operational Phase Impact Assessment

Project- Environment Interaction	Description	Mitigation Measures	Impact type	Likelihood occurrence	Severity	Impact Rating	Geographical Extend	Duration	Reversibility (R)	Significance	Confidence Level
Reduced	The borehole operation	n will ensure wildlife animals stay at wildlif	è sanctuai	y							
Human Wild-	The borehole will mak	e water readily available for wildlife even d	luring dro	ught sease	on						
Life Conflict											
Over	High and	1. Adhere to Permitted Water	-ve	2	2	4	cal	ect	R	Low	High
abstraction of	unsustainable water	Abstraction Limits: Ensure that					Local	of project		Γ	Ηi
underground	abstraction which	water abstraction does not exceed									
water	could affect ground	the volume specified in the permit.						Life			
	water quality	This helps prevent over-extraction,									
		which can lead to the depletion of									

Project-	Description	Mi	tigation Measures									2		/el
Environment				e				ting	cal			Reversibility (R)	e	Confidence Level
Interaction				t typ	poor	ence	Ŷ	t Rat	ihqa	_	uo	ibili	canc	ence
				Impact type	Likelihood	occurrence	Severity	Impact Rating	Geographical	Extend	Duration	vers	Significance	nfid
				Im	Lil	00	Se	Im	Ge	Ex	Du	Re	Sig	Co
			groundwater resources and the											
			deterioration of water quality.											
		2.	Install Automatic Monitoring											
			Systems: Where feasible, install											
			automated measuring gauges to											
			continuously monitor water											
			abstraction levels, helping to ensure											
			that it stays within permitted limits											
			and enabling prompt corrective											
			action if necessary.											
		3.	Periodic Water Level Monitoring:											
			Regularly monitor the water table											
			levels in the borehole to detect any											
			significant drops that might indicate											
			over-abstraction or other negative											
			impacts. This monitoring should be											
			carried out at consistent intervals to											
			track trends and allow for early											

Project-	Description	Mitigation Measures									rel
Environment			ట			ing	cal		Reversibility (R)	a	Confidence Level
Interaction			typ	ood	A	Rat	phic	u u	bilid	anc	ence
			Impact type	Likelihood	Severity	Impact Rating	Geographical Extend	Duration	/ersi	Significance	ıfide
			Im	Lik	Sev	Im	Gee	Dui	Rev	Sig	COI
		intervention if water levels begin to									
		decline.									
		4. Conduct Periodic Pumping Yield									
		Tests: Carry out regular pumping									
		yield tests to assess the sustainability									
		of the aquifer. These tests measure									
		how much water the aquifer can									
		supply over time without causing									
		long-term depletion. Based on the									
		results, adjustments to water									
		abstraction rates may be necessary to									
		ensure the aquifer's health is									
		maintained.									
		5. Systematic Water Quality									
		Assessments: Regularly perform									
		comprehensive water quality									
		assessments to detect any changes in									
		the chemical composition or									
		contamination of the water. These									

Project-	Description	Mitigation Measures							2		/el
Environment			e			ting	cal		ty (F	e	Lev
Interaction			t typ	nood	ý	t Rat	aphio	uo	ilidi	canc	ence
			Impact type	Likelihood occurrence	Severity	Impact Rating	Geographical Extend	Duration	Reversibility (R)	Significance	Confidence Level
			Im	Li 00	Se	In	Ē	Dı	Re	Si	Ŭ
		assessments should include tests for									
		common pollutants, such as heavy									
		metals, salts, and bacteria, to ensure									
		that the water remains safe for use									
		and that the quality does not degrade									
		over time due to over-extraction or									
		other factors.									
Risk of water	Elephant are	1. Construct an elephant proof fence	-ve	2	2	4	cal	ect	R	Low	High
infrastructure	notorious known for	around the borehole and its					Local	Life of project		Γ	Hi
destruction buy	damaging water	supporting infrastructures						e of]			
elephants	points in search for	2. Build high and thick enough walls						Life			
	drinking water	that will prevent elephants access to									
	-	the water tank and solar									
		infrastructures.									
Conflict of	Claim of ownership	1. Raise awareness of the indented	-ve	2	2	4	cal	ect	R	Low	High
water use buy	of water point /	purpose of the borehole					Local	Life of project		Lc	Hi
villagers	borehole by some	2. Ensure no one is made to be						e of]			
	community members	entitled to owning or have						Lifé			

Project- Environment Interaction	Description	Mitigation Measures	Impact type	Likelihood occurrence	Severity	Impact Rating	Geographical Extend	Duration	Reversibility (R)	Significance	Confidence Level
		controlling power on who should									
		use the borehole									
Theft of	There are reported	1. Construct theft proof fence to	-ve	2	2	4	ocal	ect	R	Low	High
borehole	cases where	protect solar panels					Lo	project		Γ	Η
infrastructures	boreholes							of			
	infrastructure such as							Life			
	solar panel are stolen										

13 GRIEVANCE PROCEDURE

The Grievance Procedures will be a process to facilitate for an easy and smooth process in which stakeholders are able to submit their complaints about the project activities or its consequences i) free of charge ii) without fear of retribution iii) anonymously and iv) user friendly channels.

It is important to emphasise that the Grievance Procedure will not address HWC incidents per se, because those are not caused by the Project. Grievances that are eligible are, for instance, cases where a party is disadvantaged as a result of a Project activity, or as a result of negligence on the part of the Project to follow its procedures thoroughly or fairly. Complainants may be by actual or potential beneficiaries of the Project, or any members of the public.

In generally, the grievances process will follow six (6) Grievance Redress Mechanism (GRM) value chain, namely; i) Receive and log grievance, ii) Acknowledge grievance, iii) Assess and Investigate iv) Grievance Resolution, iiv) Sign-off on grievance and iiiv) Monitor and continuously evaluate the effectiveness of the GRM.

Grievances will be addressed through the channels in the institutional structure presented in Figure 13 below, in an efficient, effective and consistent manner.

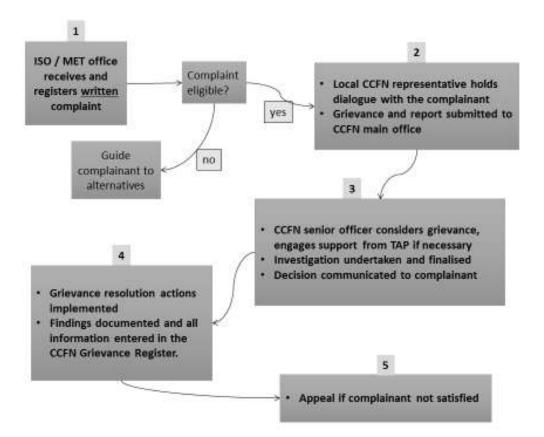


Figure 13. GRM flow chart (Source: ESMF_ Poverty Oriented Support to Community Conservation in Namibia)

The eligibility of the grievance will be assessed at the level where it is first received, at a local MEFT / ISO office (Step 1) and the following actions / steps will be undertaken. The grievance will be discussed with the complainant, with the objective of understanding the problem and giving the complainant a fair hearing (Step 2). The local CCFN representative will submit the grievance, and any notes of their own, to the CCFN head office for higher-level input to the issue (Step 2). The CCFN senior officer will investigate the substance of the grievance (Step 3). If necessary, assistance may be sought from the TAP. Further dialogue with the complainant and others affected by the grievance might also be necessary. The CCFN senior officer will compile a written report on the grievance and communicate the outcome to the complainant. Any actions necessary to resolve the grievance will be implemented by the relevant parties, under the direction of the CCFN (Step 4). Resolution of the grievance will be documented and entered into the Grievance Register. Under normal conditions, a grievance will be resolved, and redress actions commenced within 30 days of receiving a complaint. A complainant is permitted to appeal against the decision by the CCFN, to the CCFN CEO (Step 5). In such a

case the CEO must present the grievance and the CCFN decision to the Board, for reconsideration.

14 DECOMMISSIONING AND REHABILITATION PLAN

Decommissioning is normally the reverse of construction where all installed equipment / structure must be removed. Supply of water to the community is aimed to be a life-long intervention unless of a pressing issue that would necessitate decommissioning. Aging equipment that requires replacement should be done by qualified Namibians to ensure smooth operation and constant water supply.

15 CONCLUSION AND RECOMMENDATIONS

15.1 Conclusion

With the available information, the following conclusions were made:

- 1. The area is known to have high yield aquifer.
- 2. Over-abstraction of water has been not been reported in the area.
- 3. The area receives the highest rainfall in the country which increases potential of recharge.
- 4. HWC is critical in the area, and water is the main contributing factor.

15.2 Recommendations

- 1. **Issuance of the Environmental Clearance Certificate (ECC):** It is recommended that the approving authority proceed with the issuance of the Environmental Clearance Certificate (ECC), subject to the implementation of the proposed mitigation measures to ensure sustainable water management and environmental protection.
- 2. Continued Support for Wuparo Conservancy: The CCFN or the responsible government agency / ministry should support for Wuparo Conservancy to ensure regular testing of water quality, obtaining the necessary fitness-for-use approvals, and monitoring the performance of the borehole. These actions will help maintain the

sustainability and safety of the water supply, while also ensuring that the community can rely on consistent, safe access to water in the long term.

16 ANNEX 1. GROUNDWATER MONITORING PLAN

The purpose of the Groundwater Monitoring Plan is to establish appropriate procedures for monitoring and assessing the response of the aquifer and surrounding environment to the water abstraction process. The plan aims to manage the impacts of groundwater extraction and contaminant loads, while also tracking changes in aquifer response and water quality. Additionally, the monitoring system will serve as an early warning mechanism for detecting potential over-abstraction or other issues that could arise over time.

16.1 Groundwater Quality

Regular monitoring of the groundwater quality is essential to detect any changes that may occur because of abstraction, natural processes, or contamination. This monitoring should be conducted on a consistent basis to provide early warnings of any deterioration in water quality, which could affect both human consumption and ecological health. Periodic water quality testing should include key parameters such as pH levels, salinity, total dissolved solids (TDS), and the presence of pollutants (e.g., heavy metals, nitrates, or microbial contamination). This information will allow for prompt corrective action if the water quality begins to degrade, ensuring the continued safety and reliability of the water supply.

16.2 Groundwater Level Measurements

Monitoring the groundwater levels in the aquifer is a critical component of managing water resources, as it helps track the balance between the water available in the aquifer and the rate of abstraction. This is particularly important in regions with low or irregular rainfall, where natural recharge rates are minimal or non-existent. Regular water level measurements will provide valuable data on the changes in groundwater levels over time, enabling operators to identify any signs of over-extraction or potential depletion.

These measurements will be recorded through the water meter readings provided by the Ministry of Agriculture, Water, and Land Reform (MAWLR) to the borehole operator. It is important that baseline hydrological data such as the initial water level before abstraction begins is recorded to track changes over time. Regular monitoring will help ensure that water

levels remain within sustainable limits and will serve as a key reference point for evaluating the overall impact of abstraction activities. This monitoring system will also provide clear evidence of any discrepancies or errors when the MAWLR conducts periodic inspections of the site.

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18 APPENDICES

18.1 Appendix A. Attendance Register Mubana Village

MEFT MEFT MELLIN DRILLIN	on FOR ENVIE	Refinant Regention IRONMENTAL SCOPING R POINT AT SANGWALI	STUDY AND DEVEI VILLAGE IN WUPA	ELOPMENT OF ENVIR ARO CONSERVANCIE	The W Section	CCFN CCFN PLAN(6) FOR THE
	Place: Sangwali Village Date: 28 September 202 Time: 14:00PM-16:00P	Place: Sangwali Village Date: 28 September 2024 Time: 14:00PM-16:00PM				
Name	Gender	Organization	Position	Cell:	Email	Signature
amphili Lunga	Ц	endinm	New ber	C008F5E180	Nurgregenal.com	willing .
yeyp Benson	Ş	Nuparo	Nember	NA)
Sanga Ludiah	4	wurgino	Member	0813181339	0813181339 (tyunanega sang adamil	Stela
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monunal pitras	¥	www.	member	92921212190		M4
5ANYAMbe Tabert	M	CMC	member	08/3/218622		Sugg TT
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	Wupero	Member	0617258022 5	0617258022 Sanmombolouily Egnal and	an 11/2
Musufela Bruhis M	Mupan	Nember	Nember 0878958142		All alles
Manyuwe Benson M	Muparo	member	0813891240		M.B.
Ennimento suitin F	Mupan	Member	टा bi कडरतउ		od1/17
Sitonal Mahida F	Mupan	Nember			
Sanimondo Nordy F	Nuparo	Nember			Cockel
Mulersa Suglisana M	werparo	mender	0815664858		-Basty
Ricketela Sarimondo M	KUNDORO	Member	0817287319		Hut
SAYAGO SIMULA M			0812946993		5
Kanneyg Lettie R	nonbara	member	member 08/74158		milicitya
Kamaya Phasia F	overed	member			KPW
kulatau mose M			0613087698		MKK
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18.2 Appendix C: Consent letter: Mubana Village

To Whom It May Concern:

28 September 2024

Dear Sir / Madam

SUBJECT: FREE PRIOR INFORMED CONSENT FOR THE DRILLING OF WATER POINT AT \underline{MRBANA} VILLAGE, IN WUPARO CONSERVANCIES OF ZAMBEZI REGION.

The above subject bears reference,

At a community meeting held on Thursday 18th September MABUNA 2024, at Village, the community NSHESHE of _Village were fully informed about the proposed support for drilling a water borehole by the Community Conservation Fund of Namibia (CCFN).

The community and the Traditional Authority fully understood the project and its benefits. The drilling of water borehole does not interfere with our traditional norms and culture, instead it will uplift our community livelihoods and assist with the challenge of Human Wildlife Conflict. We welcome it and encourage adequate consultation during its implementation.

This letter serve as a Free Prior Informed Consent for the project.

Yours Sincerely

SANK Alex WAL! Albuee Village Headman

NSHESHE

Signature

Stamp

Village ANGWALI Shib Kitraditional Authority

Wuparo Conservacny

