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FINAL ESMP REPORT:

THE PROPOSED BASE TRANSCEIVER STATION (BTS) TOWER AND ASSOCIATED INFRASTRUCTURE FOR PARATUS TELECOMMUNICATIONS (PTY) LTD ON ERF 398, OUTJO EAST, KUNENE REGION, NAMIBIA

PROJECT NUMBER: ECC-45-569-REP-09-D

REPORT VERSION: REV 01

DATE: 21 FEBRUARY 2025





**The proposed base transceiver station (BTS) tower and associated
infrastructure for Paratus Telecommunications (Pty) Ltd on
Erf 398, Outjo East, Kunene Region, Namibia**
Paratus Telecommunications (Pty) Ltd

TITLE AND APPROVAL PAGE

Project Name: The proposed base transceiver station (BTS) tower and
associated infrastructure for Paratus Telecommunications (Pty)
Ltd on Erf 398, Outjo East, Kunene Region, Namibia

Client Company Name: Paratus Telecommunications (Pty) Ltd

Client Representatives: Mr. Edward Esterhuyse

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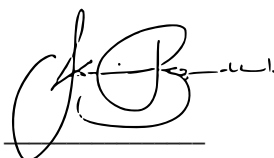
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ABBREVIATIONS

Abbreviation	Description
BTS	base transceiver station
EAP	environmental assessment practitioner
ECC	Environmental Compliance Consultancy (Pty) Ltd
EMA	Environmental Management Act No.7 of 2007
ESIA	environmental and social impact assessment
Ltd.	limited
m ²	square metre
MEFT	Ministry of Environment, Forestry and Tourism
MICT	Ministry of Information, Communication and Technology
Paratus	Paratus Telecommunications (Pty) Ltd
PPE	personal protective equipment
Pty	proprietary
RoD	record of decision



1 INTRODUCTION

1.1 PROJECT BACKGROUND

Environmental Compliance Consultancy (Pty) Ltd (ECC) has been engaged by Paratus Telecommunications (Pty) Ltd (hereto referred to as the Proponent or Paratus) to conduct an environmental and social impact assessment (ESIA) for the proposed construction and operation of a base transceiver station (BTS) tower and associated infrastructure for Paratus Telecommunications (Pty) Ltd on Erf 398, Outjo East, Kunene Region, Namibia.

Paratus is a leading privately owned pan-African network operator. Paratus offers businesses and private residences reliable, scalable and unlimited internet access through advanced technologies such as fiber, microwave, V-SAT and Mobile-LTE. Guided by its corporate mission, Paratus is focused on expanding its services and operational presence throughout Namibia. The proposed Project will enhance network services and economic development in Outjo and surrounding areas within the network reception buffer zone.

The Project site (Erf 398) covers an area of approximately 9 140 m² and is located within a well-established residential and recreational space, characterised by a mix of municipal and regional government offices, residential properties, schools, retail shops, churches and sports ground. The BTS tower will occupy approximately 100 m² of Erf 398. The town of Outjo lies approximately 70 km west of Otjiwarongo and approximately 112 km south of the renowned Etosha National Park. The Project site is shown in Figure 1.

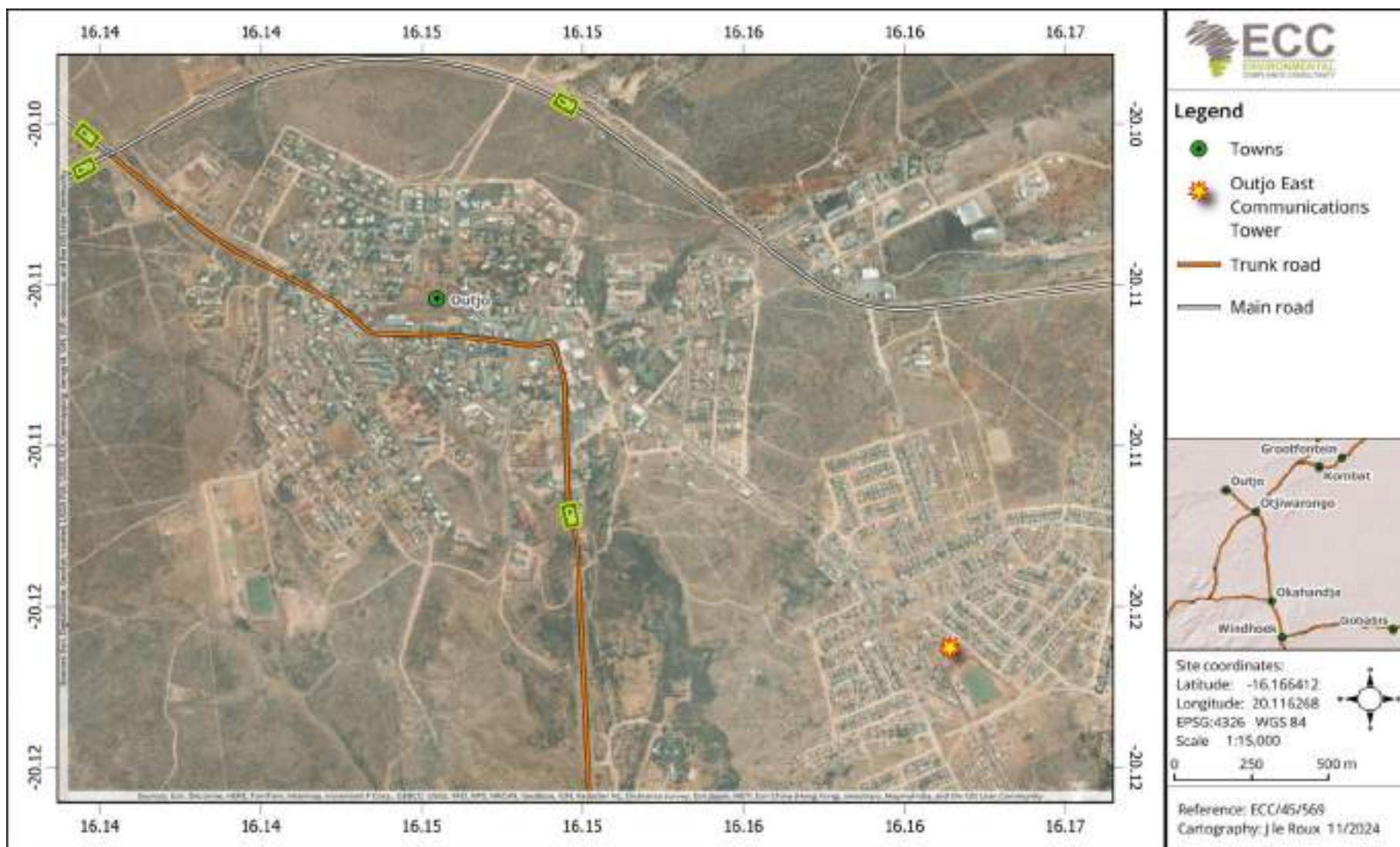


Figure 1 - Location of the proposed Project



1.2 ENVIRONMENTAL REGULATORY REQUIREMENTS

The proposed Project triggers activities listed under the Environmental Management Act, No. 7 of 2007 (EMA) and its 2012 Regulations. An environmental scoping with impact assessment (ESIA) report and the environmental and social management plan (ESMP) must be submitted as part of the application process to support the decision-making process for issuing an environmental clearance certificate for the Project.

This ESMP has been prepared in terms of the requirements of the Environmental Management Act, 2007 and its 2012 Regulations.

1.3 PURPOSE OF THIS REPORT

The environmental and social management plan (ESMP) provides a logical framework, mitigation measures and management strategies for the activities associated with the proposed Project. This ensures that the potential environmental impacts are curbed and minimised as far as practically possible and that statutory and other legal obligations are adhered to and fulfilled. Outlined in the ESMP are the protocols, procedures and roles and responsibilities to ensure the management arrangements are effectively and appropriately implemented.

This ESMP forms an appendix to the environmental scoping, with impact assessment, report and is based on the findings of the assessment. The environmental scoping, with impact assessment, report should be referred to for further information on the proposed Project, assessment methodology, applicable legislation and assessment findings.

This ESMP is a live document and shall be reviewed at predetermined intervals, and or updated during the ESIA process when or if the scope of work alters, or when further data or information is added. All personnel working on the Project will be legally required to comply with the requirements set out in the final ESMP that is approved by the competent authority Ministry of information, Communication and Technology (MICT) and the Ministry of Environment, Forestry and Tourism (MEFT).

1.4 MANAGEMENT OF THIS ESMP

The Proponent will hold the environmental clearance certificate for the proposed Project and will be responsible for the implementation and management of this ESMP. The implementation and management of this ESMP, and thus the monitoring of compliance, will be undertaken through daily duties and activities, as well as monthly inspections. Contractors and their respective subcontractors working on the Project are expected to comply with the requirements stipulated in this ESMP.

1.5 LIMITATIONS, UNCERTAINTIES AND ASSUMPTIONS RELATED TO THIS ESMP

This ESMP does not include comprehensive measures for compliance with statutory occupational health and safety requirements. This will be provided in the safety management plan to be developed by the Proponent.

Where there is any conflict between the provisions of this ESMP and any contractor's obligations under their respective contracts, including statutory requirements (such as licences, Project approval conditions, permits, standards, guidelines, and relevant laws), the contract should be amended, and statutory requirements are to take precedence.

The information presented in this ESMP is based on the Project description as outlined in the ESIA report. When the design or operation method changes, this ESMP will need to be updated, and additional assessment may be required.

1.6 ENVIRONMENTAL ASSESSMENT PRACTITIONER (EAP)

The report has been prepared by Environmental Compliance Consultancy (Pty) Ltd (ECC) (Reg. No. 2022/0593) on behalf of the Proponent. Authored by ECC employees with no material interest in the report's outcome, ECC maintains independence from the Proponent and has no financial interest in the project apart from fair remuneration for professional fees. Payment of fees is not contingent on the report's results or any government decision. ECC members or employees are not, and do not intend to be, employed by the Proponent, nor do they hold any shareholding in the project. Personal views expressed by the writer may not reflect ECC or its client's views. The environmental report's information is based on the best available data and professional judgment at the time of writing. However, please note that environmental conditions can change rapidly, and the accuracy, completeness, or currency of the information cannot be guaranteed.

All compliance and regulatory requirements regarding this report should be forwarded by email or posted to the following address:

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2 ENVIRONMENTAL MANAGEMENT FRAMEWORK

2.1 OBJECTIVES AND TARGETS

The Project site is in a disturbed environment. To mitigate any further negative environmental impacts, environmental objectives and targets have been developed to ensure that Project activities are conducted in a manner that has a minimal impact on the environment.

The overall environmental objectives for the Project are as follows:

- Manage waste efficiently and reduce environmental pollution;
- Minimal vegetation clearing;
- Limit the area of land disturbed by the Project and restore any disturbed areas after construction; and
- Use natural resources effectively and efficiently.

2.2 ORGANISATIONAL STRUCTURE, ROLES AND RESPONSIBILITIES

The Proponent shall be responsible for:

- Ensuring all members of the Project team, including contractors and subcontractors comply with the procedures set out in this ESMP;
- Ensuring that all personnel receive adequate training, supervision, and instruction to effectively fulfil the requirements stipulated in this ESMP;
- Ensuring that any persons allocated specific environmental responsibilities are notified of their appointment and confirm that their responsibilities are clearly understood; and
- Contractors and subcontractors shall be responsible for ensuring and demonstrating that all personnel employed by them are compliant with this ESMP, and meet the responsibilities listed above.

Table 1 lists the roles and responsibilities allocated to different management levels in the company and specific personnel.

Table 1 - Roles and responsibilities

Role	Responsibilities and Duties
Proponent	<ul style="list-style-type: none">- Responsible for the overall management and implementation of the ESMP;- Ensure environmental policies are drafted/updated and communicated to all personnel throughout the company;- Responsible for providing the resources required to effectively run operations and comply with the ESMP;- Ensure provisions outlined in this ESMP are including in all tendering processes; and

Role	Responsibilities and Duties
	<ul style="list-style-type: none"> - Appoint all managers needed to ensure effective running of operations.
Project manager	<ul style="list-style-type: none"> - Responsible for ensuring compliance with this ESMP including overseeing the construction work and routine maintenance work during operations, as well as the decommissioning of the infrastructure; - Ensure all personnel are aware of the commitments made in the ESMP and any other relevant regulatory requirements applicable to the Project; - Responsible for the management, maintenance and revision of the ESMP; - Ensure adequate resources are made available for implementation of this ESMP; - Maintain the community issues and concern register, and keep records of complaints; - Ensure all employees and contractors participate in a site induction process before commencing work on the Project and maintain an up to-date register; - Provisioning of environmental awareness/management training and inductions for all employees, including impacts of the BTS on human health; - Ensure that best environmental practices are undertaken throughout the Project lifecycle; and - Report any non-compliance or accidents to the regulatory authority.
Site manager	<ul style="list-style-type: none"> - Appointed to oversee the performance of construction and operational maintenance activities; - Ensure that all contract workers, sub-contractors are fully aware of the ESMP requirements relevant to their roles and consistently adhere to the outlined provisions; - Report any non-compliance or accidents; - Receive, recording and responding to complaints; - Ensure adequate resources are available for the implementation of the ESMP; and - Ensure safe and environmentally sound operations.

Role	Responsibilities and Duties
Employees (contractor and subcontractors)	<ul style="list-style-type: none"> - Comply to the measures outlined in the ESMP; and - Report any operations or conditions which deviate from the ESMP as well as any non-compliant issues or accidents to the Site Manager.

2.3 CONTRACTORS AND SUBCONTRACTORS

Any contractors hired during the construction work or maintenance activities during the operational phase shall be compliant with this ESMP and shall be responsible for the following:

- Undertake construction activities in accordance with this ESMP as well as relevant policies, procedures, management plans, statutory requirements, and contract requirements;
- Implement appropriate environmental and safety management measures;
- Engage in industry best practices to ensure long-term Project sustainability;
- Report environmental issues, including actual or potential environmental incidents and hazards, to the Site manager or Project manager; and
- Ensure that appropriate corrective or remedial actions are implemented to address all environmental hazards and incidents. Lessons learnt should always be documented for future reference and continuous improvement.

2.4 EMPLOYMENT

The scope of work requires specialised skill sets that may not be available locally. However, should there be any employment opportunities, particularly unskilled and semi-skilled positions, the Proponent and all contractors must comply with the requirements of the Republic of Namibia's regulations for Labour, Health and Safety, and any amendments to these regulations. The following shall be complied with:

- In liaison with local government and community authorities, the Proponent shall ensure that local people have access to information about job opportunities and are considered first for unskilled or semi-skilled construction/maintenance opportunities;
- The number of job opportunities shall be indicated;
- The maximum length of time the job is likely to last for shall be indicated;
- Foreign workers with no Namibian work permits shall not be hired; and
- Every effort shall be made to recruit from the pool of unemployed workers living in Outjo.

3 COMMUNICATION AND AWARENESS

To ensure potential risks and impacts are minimised, it is vital that personnel are appropriately informed and briefed on how to properly implement the ESMP. It is also important that regular communication is maintained with stakeholders (if applicable) and made aware of potential impacts and how to minimise or avoid them. This section outlines the framework for communication related to the implementation of the commitments that are specified in this ESMP.

3.1 COMMUNICATION

During construction, the Project manager and Site manager shall communicate site-wide environmental issues to the Project team through the following means (as and when required):

- Site inductions;
- Audits and site inspections;
- Toolbox talks, including instructions on incident response procedures; and
- Briefing on key Project-specific social and environmental issues.

This ESMP shall be distributed to the construction team including any contractors and subcontractors to ensure that the environmental requirements are adequately communicated. Key activities and environmentally sensitive operations will be highlighted to workers and contractors.

During the construction phase, communications between the construction team shall include discussion on any complaints received and actions to resolve them, any inspections, audits, or non-conformance with this ESMP, and any objectives or target achievements.

3.2 ENVIRONMENTAL EMERGENCY AND RESPONSE

An emergency is any abnormal event, which demands immediate attention. It is any unplanned event, which results in the temporary loss of management control at site, but where functional resources can manage the response. An emergency response plan document will be put in place that manages the response in relation to emergencies including environmental emergencies. Table 2 provides a list of numbers to be contacted in case of an emergency.

Table 2 - Emergency contact details

Town	Ambulance	Police	Fire Brigade
Outjo	+264 (0) 67 313 005	+264 (0) 67 313 005	+264 (81) 255 0060

3.3 COMPLAINTS HANDLING AND RECORDING

Any complaints received verbally by any personnel on the Project site shall be recorded by the receiver including:

- The name of the complainant;

- The contact details of the complainant;
- Date and time the complaint was received; and
- The nature of the complaint.

The information shall be provided to the Project manager who holds overall responsible for managing complaints. The Project manager shall do the following:

- Inform the Site manager of issues, concerns, or complaints;
- Maintain the complaint register;
- Provide a written response to the complainant of the results of the investigation and action to be taken to rectify or address the matter(s). Where no action is taken, the reasons why are to be recorded in the register.

The workforce (contractor employees) shall be informed about the complaints register, its location and the person responsible, to refer residents or the public who wish to lodge a complaint. The complaints register shall be kept for the duration of the Project and must be available for government or public review upon request.

3.4 WORKFORCE COMPETENCY

All personnel working on the Project shall be competent to perform tasks that have the potential to cause an environmental impact. Competence is defined in terms of appropriate education, specialised skill sets and work experience.

3.5 SITE INSPECTION AND TOOLBOX TALKS

All personnel involved in the Project shall be inducted to the site regarding specific environmental, social awareness, health and safety issues. The workforce must be briefed on the observations recorded during the site inspections during toolbox talks. The workforce must demonstrate an understanding of the principles outlined in this ESMP, and the potential environmental and social impacts associated with their activities. All personnel must also demonstrate clear understanding of the procedures required to control these impacts and the consequences of departure from these procedures.

All personnel roles and responsibilities concerning the implementation of the ESMP:

- Understand the site's environmental rules;
- Understand the necessary steps to address any environmental issues and identify the appropriate contacts for resolving such problems;
- The potential consequence of non-compliance with this ESMP and relevant statutory requirements; and
- The roles of responsible people working on the Project.

4 REPORTING, COMPLIANCE AND ENFORCEMENT

4.1 ENVIRONMENTAL PERFORMANCE MANAGEMENT

Table 3 and Table 4 provides the overall management plan of potential impacts of the Project. This plan provides mitigation and monitoring commitments, as well as the roles responsible for execution. The Project manager and Site manager will use this register to undertake monthly inspections to ensure the Project is compliant with this ESMP.

4.2 CONSTRUCTION: ENVIRONMENTAL INSPECTIONS AND COMPLIANCE MONITORING

4.2.1 DAILY COMPLIANCE MONITORING

A copy of this ESMP will be on-site throughout the construction phase and will be available upon request. Contractors and subcontractors must be issued with a copy of this ESMP. It is the responsibility of the Project manager and Site manager to ensure this ESMP is complied with through their daily roles. Daily inspections will be undertaken by the Site manager (or nominated site supervisor). Any environmental problems or impacts identified will be reported to the Project manager and actioned as soon as is reasonably practicable.

4.2.2 MONTHLY COMPLIANCE MONITORING

Monthly inspections will be undertaken by the Site manager to assess whether the standards and procedures set out in this ESMP are being complied with and environmental control measures are in place and working correctly. Any non-conformance will be recorded, including the following details: a brief description of non-conformance; the reason for the non-conformance; the responsible party; the result (consequence); and the corrective action taken and any necessary follow up measures required.

4.3 OPERATIONS: ENVIRONMENTAL INSPECTIONS AND COMPLIANCE MONITORING

Annual inspections will be conducted by the Project manager. All infrastructure will be inspected to ensure that the telecommunication tower is operating as per specification and that no damages have been caused. Any non-conformance will be recorded, including the following details: a brief description of non-conformance; the reason for the non-conformance; the responsible party; the result (consequence); and the corrective action taken and any necessary follow up measures required.

4.4 REPORTING

It is required that any incident or non-compliance, including any environmental issue, failure of equipment or accident, is reported to the Project manager throughout the Project's lifecycle. The MEFT must be notified of these incidents and provided with bi-annual reports that assess the Project compliance to the commitments stipulated in this ESMP.

4.5 NON-COMPLIANCE

Where it has been identified that works are not compliant with this ESMP, the Project manager will implement corrective action(s) to the extent that the works return to being compliant as soon as possible. In instances where the requirements of the ESMP are not upheld, a non-conformance and corrective action notice will be produced. The notice will be generated during the inspections and the Project manager will be responsible for ensuring a corrective action plan is established and implemented to address the identified shortcoming.

A non-compliance event / situation is considered if:

- There is evidence of contravention of this ESMP and associated indicators or objectives;
- The contractor or subcontractor has failed to comply with corrective actions or other instructions issued by the Project manager, Site manager or qualified authority; or
- The contractor or subcontractor, through the appropriate reporting channels fail to respond to complaints from the public.

Works will be stopped in the event of a non-compliance, until corrective action(s) has been completed. A compliance report will be produced each month, as discussed previously.

4.5.1 DISCIPLINARY ACTIONS

This ESMP is a legally binding document and non-compliance with it shall result in disciplinary action(s) being taken against the perpetrator/s. Such action may take the form of (but is not limited to):

- Fines or penalties;
- Legal action;
- Monetary penalties imposed to the contractors or subcontractors;
- Withdrawal of the licence; or
- Suspension of work.

5 ENVIRONMENT AND SOCIAL MANAGEMENT

5.1 OBJECTIVES AND TARGETS

This section details the commitments and best practices for implementation to ensure that potential impacts during both the construction and operational phase are minimised, mitigated and remain manageable.

The environmental and social objectives for the construction and operational phase are as follows:

- Zero noise and dust complaints from the community;
- Engage in appropriate, safe disposal practices of cleared materials and construction waste;
- Effective management and storage of materials and equipment during the construction phase; and
- Zero grievances or complaints from the community regarding exposure to radiation emitted by the telecommunication tower.

5.2 ENVIRONMENTAL AND SOCIAL ASPECT AND IMPACT MANAGEMENT PLAN

Table 3 and Table 4 outline the environmental aspects and impacts (as derived from the ESIA) associated with both the construction and operational phase of the Project. The tables summaries corresponding mitigation measures, monitoring protocols, and the personnel responsible for ensuring compliance. The summary tables will be regularly reviewed by the Project manager or Site manager and updated as needed. The registers will be used to conduct monthly inspections (as detailed in the next section) to ensure the Project remains compliant with the ESMP.

Table 3 – Environmental and social aspects, impacts, mitigation and monitoring measures for the construction phase

Aspect	Potential impacts	Management /mitigation measures	Monitoring requirements	Responsibility
Construction phase				
Noise	Community severance and disruption of social interactions.	<ul style="list-style-type: none"> – Early notice / warning regarding the commencement of construction work. Erect a notice board on-site to inform residents about the Project. All contractors working on the Project must be displayed; – Engage the Etoshapoort Junior Secondary School prior to scheduling or commencing with Project noisy activities; – Conduct pre-start checks on equipment; – Conduct construction activities between dawn and dusk (day shifts only); – Avoid unnecessary idling of equipment and machineries; – Ensure the best available technology with low sound power is used; and – A complaint register must be kept. Complaints received should be addressed as per complaint handling procedures. 	<ul style="list-style-type: none"> - Daily - Weekly - Monthly 	Project manager Site manager Contractor employees
Visual	Disruption of the visual landscape and diminished sense of place.	<ul style="list-style-type: none"> – Good housekeeping; and – Cranes and all other tall construction equipment should only be retained on-site for the duration of construction activities. 	- Weekly	Site manager Contractor employees
	Potential risk for local aircrafts to collide into the	<ul style="list-style-type: none"> – The tower must be equipped with alternating white and red or white and orange visibility markers. The selected colours 	Weekly	Project manager Site manager

Aspect	Potential impacts	Management /mitigation measures	Monitoring requirements	Responsibility
Construction phase				
	telecommunication tower or construction equipment.	<p>must provide adequate contrast against the background to ensure visibility; and</p> <ul style="list-style-type: none"> – Cranes and all other tall construction equipment should only be retained on site for the duration of construction activities. 		Contractor employees
Occupational health and safety	Potential for injuries or fatalities to be sustained on-site during the construction phase.	<ul style="list-style-type: none"> – Contractors and subcontractors should comply to all safety requirements outlined in the contracts signed with the Proponent; – Only contractor employees with specialised skills should be assigned tasks associated with injury risks; – Construction activities should be conducted between dawn and dusk (day shifts only); – All employees must be equipped with appropriate personal protective equipment (PPE) (e.g. hard hat, safety harness, ear plugs, fall arresters, safety boots); – A first aid kit must always be kept on-site and readily accessible; – Ensure that semi-skilled workers (if employed) receive comprehensive training and clear instructions on safe handling of tools and equipment; – Conduct regular site inspections to monitor compliance with safety standards (e.g. ensuring that tools are securely stored and in a manner that prevent them from free falling); and – All incidents should be recorded in the incident register. 	Daily	Contractor employees

Aspect	Potential impacts	Management /mitigation measures	Monitoring requirements	Responsibility
Construction phase				
Community health and safety	Potential community interaction with Project equipment.	<ul style="list-style-type: none"> - The construction site must be securely barricaded with tape and signage to ensure safety; - Ensure a perimeter security fence is erected around the telecommunication tower to prevent un-authorised access and ensure the safety and security of the site; and - Ensure warning signboards, translated into local languages such as English, Afrikaans, Otjiherero, and Oshiwambo, are erected at the boundary fence to inform and alert the public about the site's restrictions and safety precautions. 	Daily	Contractor employees
Air quality	Dust generation and dispersion into the broader community.	<ul style="list-style-type: none"> - Limit land clearing activities and any other construction activities to the actual Project footprint; - Use dust suppressant measures to prevent nuisance to residents; - Inform residents when land clearing activities will commence; - Construction workers should always be equipped with appropriate PPE (e.g. dust masks); - All vehicles and machinery / equipment to be shut down or throttled back between periods of use; - Project vehicles should be confined to designated and established roadways; - Dust generating activities should be avoided during strong wind events; and 	-Daily observations	Site manager Contractor employees

Aspect	Potential impacts	Management /mitigation measures	Monitoring requirements	Responsibility
Construction phase				
		<ul style="list-style-type: none"> - Maintain a complaint register. Complaints recorded should be addressed as per the complaint management procedures. 		
Biodiversity	There is a potential for birds to roost and nest on the telecommunication tower.	<ul style="list-style-type: none"> - Ensure the telecommunication tower is equipped with bird deterrents to prevent birds from perching or nesting on the telecommunication equipment. 	On-going as construction activities progresses	Site manager Contractor employees
Best environmental practices				
Construction waste management	Litter and visual nuisance.	<ul style="list-style-type: none"> - Good housekeeping; - Litter generated during construction activities, such as cement bags, must be collected in plastic bags and/or stored directly in the waste receptors; - Bins and skips must be fitted with lids that seal properly to prevent windblown debris; - No waste may be burnt or buried on site; - No fires will be allowed on-site; and - Empty containers, oil filters (if used) should be removed from the site and disposed of at a suitable registered hazardous waste facility. 	<ul style="list-style-type: none"> - Daily - Weekly 	Contractor employees

Aspect	Potential impacts	Management /mitigation measures	Monitoring requirements	Responsibility
Construction phase				
Domestic effluent management	Odours and health risks	<ul style="list-style-type: none"> – Only ablution facilities to be used; – No employee or contractor on-site may relieve himself or herself in the surrounding environment or work area; and – Temporary ablution facilities, if provided on-site during the construction phase, must be cleaned regularly to maintain hygiene and prevent health risks. 	Daily Weekly Monthly	Project manager Site manager Contractor employees
Handling of fuel, oil and other hydrocarbons	Soil contamination	<ul style="list-style-type: none"> – Any fuel tank or container should be on a flat area, away from any water resource; – Fuel bowzers must be equipped with drip trays during each refuelling event to prevent spills and ensure proper containment; – The containers shall be stored on an impervious base, be bunded and capable of containing at least 110% of the total capacity of the storage container; – Ensure proper fuel use and clean-up procedures are in place and followed; – Smoking in the vicinity of flammable substances is prohibited; – No chemicals, used oil or other hydrocarbons shall be disposed on-site; – Equipment must be maintained regularly to prevent fuel, oil or hydraulic leaks; 	Daily Weekly	Contractor employees

Aspect	Potential impacts	Management /mitigation measures	Monitoring requirements	Responsibility
Construction phase				
		<ul style="list-style-type: none"> - All personnel handling fuel, oil or chemicals shall be equipped with appropriate PPE; - All mobile equipment and machinery must be refuelled on impermeable surfaces and situated away from drains; and - A spill kit must be readily available on-site to ensure prompt cleanup of any spills; and - All spill incidences should be recorded. 		
Camping on-site/ overnight stay	Littering, security concerns	<ul style="list-style-type: none"> - Personnel are not allowed to set up overnight camps on-site during the construction phase; - If a security guard is required, he/she must be sourced from a formal registered security company; - The basic amenities (e.g. ablution facility and hand washing soap) must be provided for the security guard tasked with guarding the Project's properties and equipment. 		

Table 4 – Environmental and social aspects, impacts, mitigation and monitoring measures for the operational phase

Aspect	Potential impact	Management/mitigation measures	Monitoring requirements	Responsibility
Operational phase				
Biodiversity	Visual nuisance associated with bird droppings.	<ul style="list-style-type: none"> - Conduct cleanup of bird droppings on an ad hoc basis (e.g. cleanups during inspections or before conducting any maintenance work). 	Ad hoc basis (during scheduled maintenance work)	Maintenance team
Occupational health and safety	Potential for on-site injuries and accidents during maintenance work.	<ul style="list-style-type: none"> - Only contractor employees with specialised skills should be assigned tasks associated with injury risks; - The maintenance team must be equipped with appropriate PPE required for them to safely perform maintenance work (e.g. hard hat, safety harness, ear plugs, fall arresters, safety boots); - maintenance activities should be conducted between dawn and dusk (day shifts only); - A first aid kit must always be kept on-site and readily accessible; and - All incidents should be recorded in the incident register. 	Ad hoc basis (during scheduled maintenance work)	Maintenance team
	Potential for employees to be exposed to non-ionising radiation during	<ul style="list-style-type: none"> - The maintenance team must be equipped with appropriate PPE during maintenance work. 	During scheduled maintenance work	Maintenance team

Aspect	Potential impact	Management/mitigation measures	Monitoring requirements	Responsibility
Operational phase				
	maintenance work.			
Community health and safety	Potential public exposure to non-ionising radiation	<ul style="list-style-type: none"> - Ensure that the warning signboards erected on the perimeter fence remain in place; and - Maintain a complaint register throughout the operational phase. 	At all times	Project manager
Best environmental practices				
Waste management	Litter and visual nuisance	<ul style="list-style-type: none"> - Good housekeeping; - Litter generated during maintenance activities must be collected in plastic bags and/or stored directly in the waste receptors or removed from site at the end of a shift; - Bins and skips must be fitted with lids that seal properly to prevent windblown debris; - No waste may be burnt or buried on site; and - No fires will be allowed on-site. 	During scheduled maintenance work	Maintenance team



6 IMPLEMENTATION OF THE ESMP

This ESMP:

- A. Has been prepared pursuant to the contract with the Proponent;
- B. Has been prepared on the basis of information provided to ECC up to February 2025;
- C. Is for the sole use by the Proponent, contractors and subcontractors during the construction and operational phase;
- D. Must not be used by any person other than (1) the Proponent (2) Contractors and subcontractors; and
- E. Must not be copied without the prior written permission of ECC.