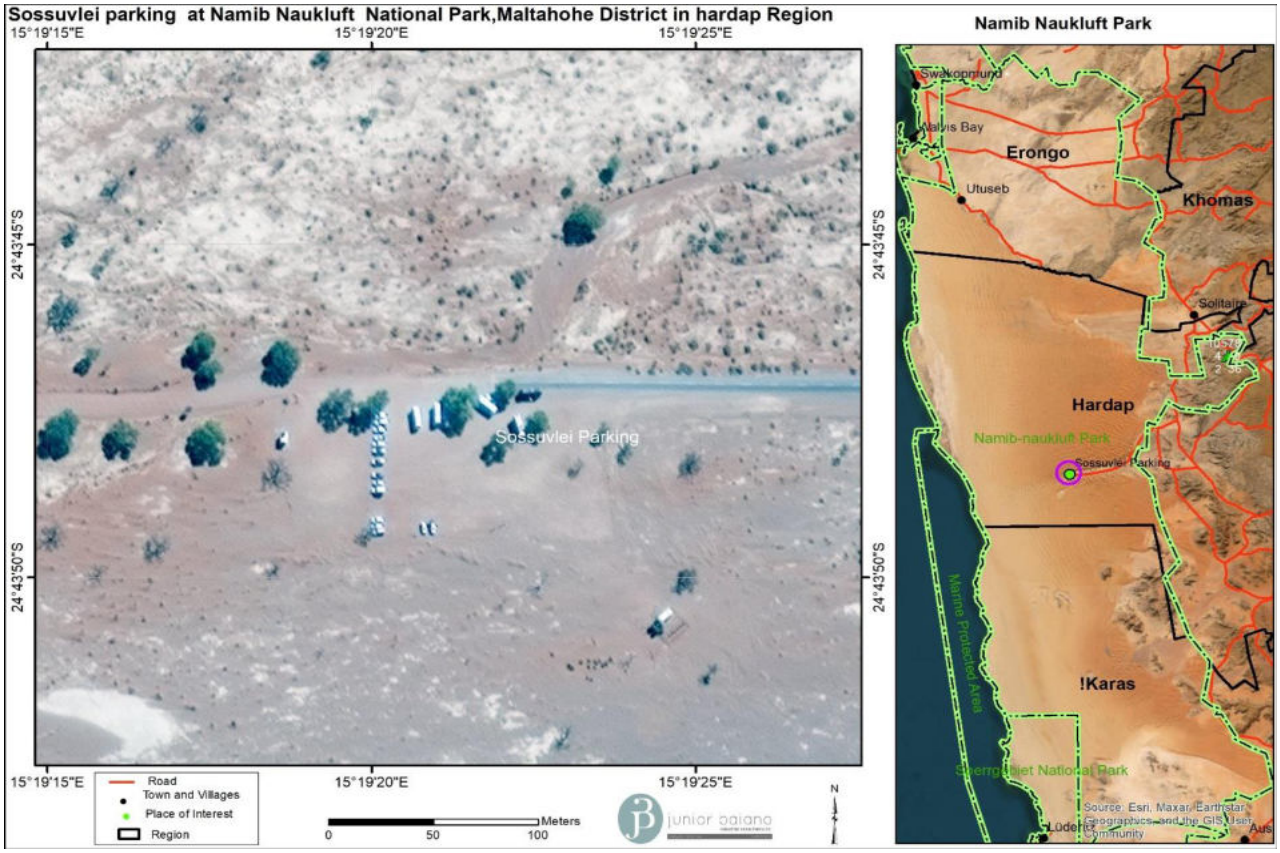
ENVIRONMENTAL MANAGEMENT PLAN

FOR

THE PROPOSED DEVELOPMENT AND OPERATION OF A SOSSUSVLEI SHUTTLE SERVICE WITHIN THE NAMIB NAUKLUFT NATIONAL PARK THE HARDAP REGION: NAMIBIA



Prepared by: Junior Baiano Industrial Consultants cc
Postal Address: PO Box 23537, Windhoek
Contact Person: Fredrich Nghiyolwa
Contact number: +264 (61) 219 773
Cell: +264 (0) 81 1472029
Email: JuniorB200581@gmail.com

Prepared for: ABOUT ADELT SOSSUSVLEI CONCESSION MANAGEMENT (PTY) LTD
Postal Address: Po Box 173, Swakopmund
Contact Person: Heiko Dorgeloh
Contact number: +264 811273366Email: laz@sag.com.na

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1.1 INTRODUCTION

Junior Baiano Industrial Consultants (JBIC) cc has been appointed by **ABOUT ADELT SOSSUSVLEI CONCESSION MANAGEMENT (PTY) LTD** to act on their behalf and apply for an Environmental Clearance Certificate (ECC) for the proposed development and operation of a Sossusvlei shuttle service (parking lots , picnic setup place and a kiosky) within the Namib Desert in Namib Naukluft National Park.

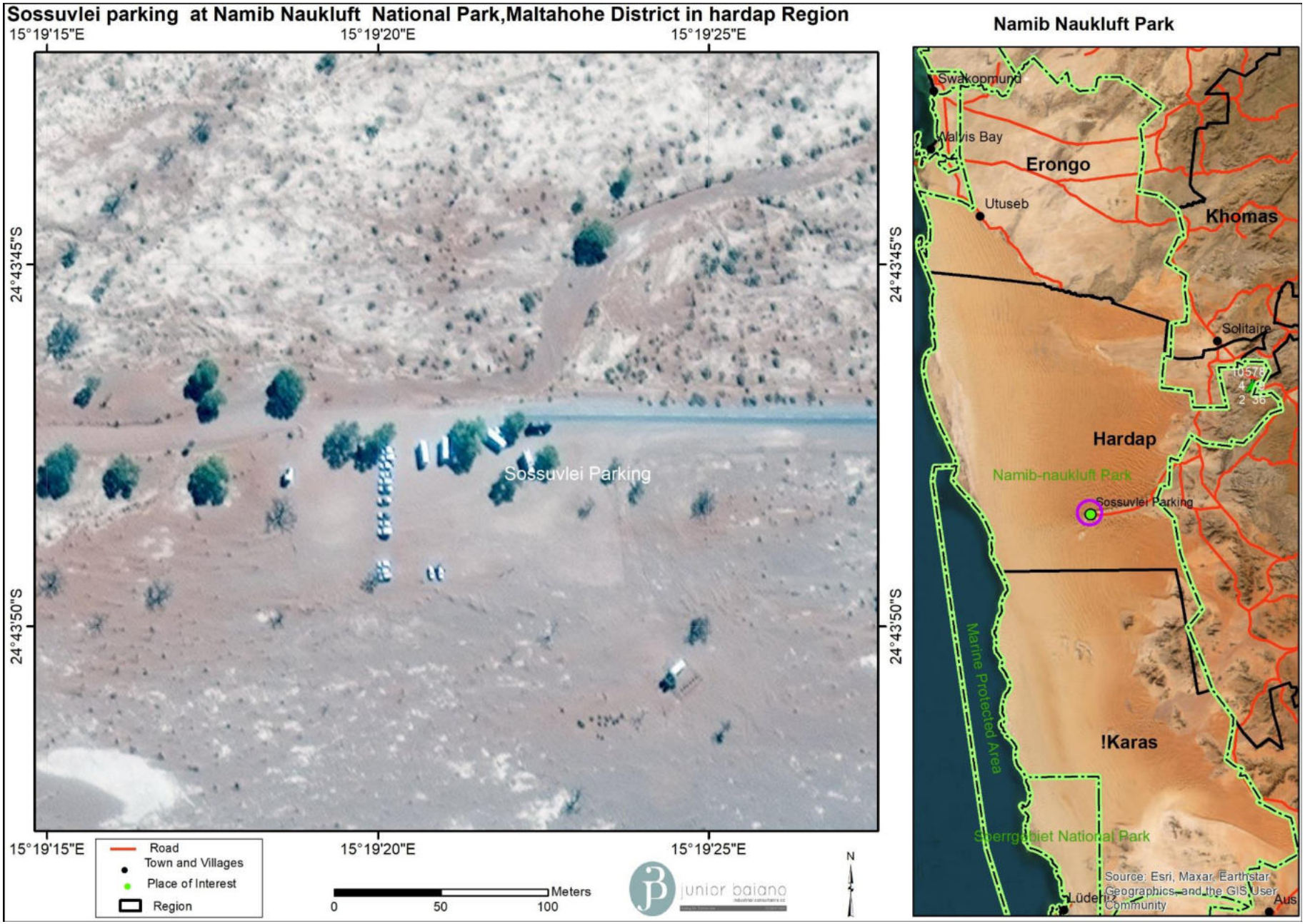
The establishment of proposed project is however one of the listed activities in the 2012 EIA Regulations of the Environmental Management Act No. 7 of 2007 that may not be undertaken without an Environmental Clearance Certificate (ECC). The relevant listed activities as per EIA regulations are:

6. The construction of resorts, lodges, hotels or other tourism and hospitality facilities.

OTHER ACTIVITIES:

11.2 Construction of cemeteries, camping, leisure and recreation sites.

It is for this reason that **Junior Baiano Industrial Consultants** has been appointed by the Proponent to undertake the EA and apply for the ECC.


Sossuvlei parking at Namib Naukluft National Park,Maltahohe District in hardap Region
15°19'15"E
15°19'20"E
15°19'25"E
24°43'45"S
24°43'50"S
Sossuvlei Parking
Road
Town and Villages
Place of Interest
Region
0
50
100
Meters
junior baiano
N
Namib Naukluft Park
Swakopmund
Walvis Bay
Erongo
Utuseb
Khomas
Solitaire
Hardap
Namib-naukluft Park
Sossuvlei Parking
Marine Protected Area
!Karas
Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community
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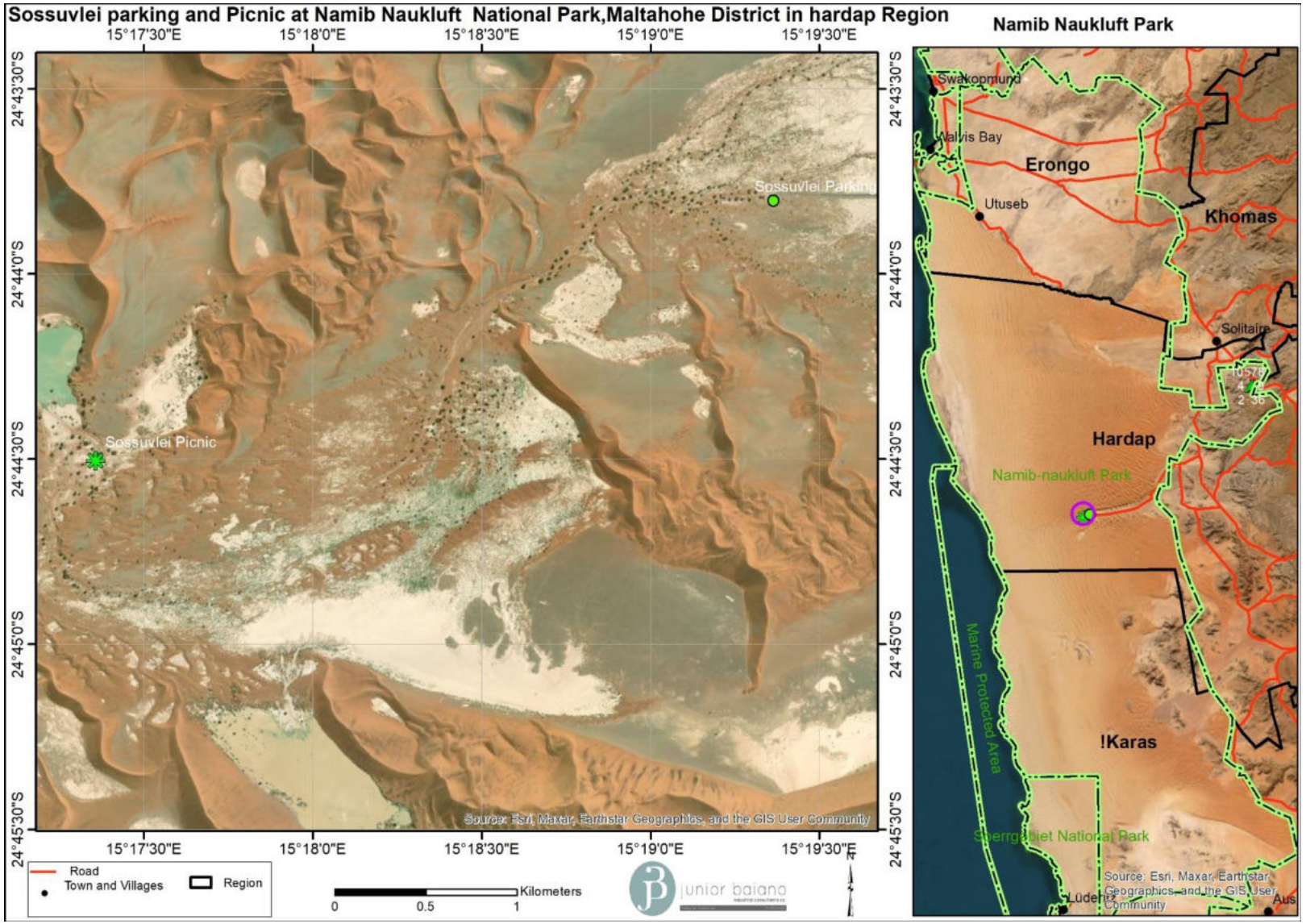

Figure 2: Site locality for the picknick set ups within the national park

1.2 EMP ADMINISTRATION

There is a strong need to clearly outline the roles and responsibilities of all stakeholders to ensure that the EMP is fully implemented. There is also a need for the proponent to appoint an overall responsible person (project manager) to ensure the successful implementation of the EMP as highlighted below.

Table 1: Roles and Responsibilities in EMP Implementation

ROLE	ENVIRONMENTAL RESPONSIBILITIES
ABOUT ADELT SOSSUSVLEI CONCESSION MANAGEMENT (PTY) LTD (The proponent)	Responsible to enforce EMP implementation to contractors
Environmental Control Officer	• Implement, review and update the EMP. • Ensure all reporting and monitoring required under EMP is undertaken, documented and distributed as needed • Conduct environmental site training (tool box talks) and inductions with the support of an environmental consultant. • Conducts environmental audit at work site with the support of environmental consultant. • Close out all non-conformances. • Ensure materials being used on site are environmentally friendly and safe.
The Department of Environmental Affairs	• Approve the EMP and any amendments to the EMP. • Approve reports of environmental issues and non-conformances as issued. • Review and approve environmental reports submitted as part of EMP implementation
Environmental Consultant	• Conduct and monitor actions required by the EMP if required • Conduct environmental site training (tool box talks) and inductions if assistance is required • Conducts environmental audit at work site • Ensure materials being used on site are environmentally friendly and safe.
Site Technical Team	• Control and monitor actions required by the EMP. • Report all environmental issues to Environmental Control Officer. • Ensure documented procedures are followed and records kept on site.

ROLE	ENVIRONMENTAL RESPONSIBILITIES
	• Ensure any complaints are passed onto the management within 24 hours of receiving the complaint.
Workers	• Follow requirements as directed by site technical. • Report any potential environmental issues to site engineer/project manager, indicating spilt oil, excess waste, excessive dust generation, dirty water running off the site and other possible non-conformances

1.3 EMP Management Actions

The management actions aim to avoid potential impacts where possible. Where impacts cannot be avoided, management actions are outlined in order to minimize the significant impacts.

The tables below outline the specific management actions which need to be undertaken during the construction and operational phase of the development to ensure that the site activities are compliant.

1.4 CONSTRUCTION / SETTING UP AND OPERATIONAL PHASE MANAGEMENT ACTIONS

The table below outlines the management actions to be undertaken during the construction and operation phase of the project to ensure compliance with the EMP.

Table 2: Construction / setting up of the of the shuttle service, parking lot and pickinic set up and Operations

Impact	Description	Effects	Class	Time frame	Responsibility	Action	Phase
Noise pollution	Noise will be generated through: • Setting up the shuttle services, picknic and parking lots • Moving vehicles.	• The health of working personnel could be disturbed e.g., noise hearing loss. • Community residents could be disturbed by the noise. • General annoyance • Driving away of local animal species near the project site	Environmental	Construction phase and operational phase	• Environmental Control Officer • Site Manger	• A construction interval will be established, used and adhered to. • Public will be notified through printed timetable stating planned operational activities. • Site notices will be erected on, around the site-notifying visitors, and nearby residents of different hazards on site e. g noise . • No go areas marked as sensitive	**Construction & Operation**

Impact	Description	Effects	Class	Time frame	Responsibility	Action	Phase
						environments, especially for birds needs to be avoided during construction and operation.	
Dust Generation	Dust will accumulate because of the land preparation, onsite movements of vehicles and machines, wind blowing on loose material during construction and tipping.	• Can lead to respiratory illnesses especially to those working in the area. • General air pollution. • Nuisance to nearby residents • The process can also drive away wild animals within the project area surroundings	Environmental	Construction phase and operational phase	• Environmental Control Officer • Project Manger	• Dust suppression will be done through watering dust sources surfaces. • Watering down dusty surfaces, • Ensure that protective equipment such as respirators are distributed to employees and ensure their use. • Site notices to be erected on and around the site to	**Construction & Operation**

Impact	Description	Effects	Class	Time frame	Responsibility	Action	Phase
						inform visitors and surrounding residents.	
Loss of Biodiversity	• Vegetative plants on site will be removed • Habitat destruction for both ground dwelling species and tree dwelling species. • Soil disturbance on and around the site.	• The clearing of vegetation will result in the breaking of the ecosystem processes in the area. • Loss of aesthetic value of the proposed project area. • The few small animals still habiting the place such as small rodents and birds will be forced away. • The ecosystem food chain on and	Environmental	Construction phase and operational phase phase	• Environmental Control Officer • Site Manager	• All the major trees will be preserved, and the layout plan will fit into the environment without affecting the trees. • Ground disturbance will only be limited to the boundary area to avoid affecting a large area. • Upon completion of construction activities more vegetation will be planted on and around the site to restore the site into	**Construction and operational phase**

Impact	Description	Effects	Class	Time frame	Responsibility	Action	Phase
		around the area will be broken.				a status that is environmentally friendly. • When necessary, a permit must be obtained from the Directorate of Forestry before removing a major tree species (In this respect, a permit is not necessary to be obtained for land clearance for MAWF) • Any identified protected species must not be removed, and they must be clearly	

Impact	Description	Effects	Class	Time frame	Responsibility	Action	Phase
						marked, and such areas fenced off. • Utilise existing tracks and roads where possible. • During vegetation clearing avoid killing and/or hunting of animals. • The proponent must also adhere to the recommendation measures recommended in the Biodiversity specialist report.	
Greenhouse gas emissions	Green House Gasses (GHGs) emissions will be produced from	• Global climate change • Air pollution	Environmental	Project lifetime	• Environmental Control Officer • Project Manager	• Adopt the use of ethanol blended fuels wherever necessary.	**Construction & Operation**

Impact	Description	Effects	Class	Time frame	Responsibility	Action	Phase
	the following activities: • Fuels combustion for transport (construction vehicles and equipment) • Ground excavation releases phosphorus found underground and releases particulate matter into the atmosphere.				• Department of Environmental Affairs.	• Design an operation system that cuts on fuel consumption. • Use of solar energy system during construction for lighting and other minor energy needs.	
Waste Generation	Construction and operations are associated with a	• Chemical pollution from oil spills resulting from the	Environmental	Project lifetime	• Environmental Control Officer • Project Manger	• Ensure that all waste from construction	**Construction & Operation**

Impact	Description	Effects	Class	Time frame	Responsibility	Action	Phase
	lot of raw material and activities that results in pollution	handling of various machineries used during the construction phase • Construction rubble, empty packaging containers/bags and materials remnants. • Construction workers can also pollute the surrounding environs if they are not provided with adequate toilet facilities and a waste management system for domestic waste.				activities is disposed in an appropriate manner. • Bulky waste such as building rubbles must be collected and disposed of for landfilling. • Hazardous waste storage bin will be on site and an independent hazardous waste transporting company will be contracted to collected hazardous waste storage bin whenever it is full. • Visual inspections monitoring	

Impact	Description	Effects	Class	Time frame	Responsibility	Action	Phase
						• All waste will be managed by proponent and the developer will ensure that domestic waste handling facilities such as labelled dustbins will be available. • Waste separation will be provided for to allow for recycling of recyclable materials i.e. glass, hazardous waste, paper, bio-degradable waste.	
Hydrocarbons release into the	There will be no storage of oils and fuel on site,	• Washing away of contaminated soils	Environmental	Project lifetime	• Environmental Control Officer	• Implement a maintenance programme to	**Construction & Operation**

Impact	Description	Effects	Class	Time frame	Responsibility	Action	Phase
environment (oil spill)	however there is risk of spillage of hydrocarbons from vehicles and machinery operations, maintenance through leakages and spillages which may result in environmental contamination	by rains into nearby rivers • Pollution of soil and affecting small living organisms habituating the soil • Result in possible groundwater pollution. • Possible fire risk on and around the site			• Project Manager • Department of Environmental Affairs.	ensure all vehicles, machinery and equipment are and remain in proper working order • Vehicle maintenance should be conducted in designated areas only, preferably off-site. • If maintenance is to be conducted on site, these areas should be designed to contain spillages i.e. maintenance site must be bunded and paved and the use of chemicals must be controlled.	

Impact	Description	Effects	Class	Time frame	Responsibility	Action	Phase
						• Spillages contaminants are to be removed from site by a specialist waste removal contractor such as rent a drum. • All stationary vehicle must be equipped with drip tray, • Waste oil, fuels and other chemicals from drip trays on stationery vehicles and machinery will be disposed of as hazardous waste at a licensed facility by a specialist hazardous waste handler.	

Impact	Description	Effects	Class	Time frame	Responsibility	Action	Phase
						• Oil residue will be treated with oil absorbent material such as Drizit or bioremediation and removed to an approved waste disposal site • Spill kits will be easily accessible and workers will be trained in the use thereof. • Staff and contractors will be trained in the handling and storage of oils, fuels, chemicals and other hazardous substances	

Impact	Description	Effects	Class	Time frame	Responsibility	Action	Phase
						• No bins containing organic solvents such as paint and thinners shall be cleaned on site, unless containers for liquid waste disposal are provided on site.	
Safety and Health risks	Construction related Safety and Health hazards	• Injuries to workers such as Occupational dermatitis, slips and fall of humans and objects, musculoskeletal disorders, etc.	Health and safety	Construction phase and operational phase	HSE Officer	• Equip workers with Personal Protective Equipment (PPE), provide trainings on how to effectively use the PPE. • Provide platforms for briefings and meetings about possible safety and health hazards in the workplace.	**Construction and operation**

Impact	Description	Effects	Class	Time frame	Responsibility	Action	Phase
						• Provide site signs warning and informing about different hazards on site.	
	Electrical hazards	Fatalities and fires	Health and safety	Project lifetime	HSE Officer	• Employees should be trained on electrical safety before working on site. • Safety representative with training on electrical hazards emergency management should be station on site always.	**Construction and Operation**

Impact	Description	Effects	Class	Time frame	Responsibility	Action	Phase
						• Safety signs during construction and operation should be put on-site, no-go areas should be labelled, PPE specifications should be clear to maintenance personnel.	
Population Influx	The project will bring in skilled and unskilled workforce into the area.	• There is potential for cultural systems conflict between locals and new people in the area • Potential for rife prostitution and spread of HIV/AIDS and other STDs	Socio-economic	Project lifetime	• Environmental Control Officer • Project Manger	• Train and brief employees to respect local cultures and leaders, • Engage on massive sexual health training and awareness and providing contraceptives such	**Construction and Operation**

Impact	Description	Effects	Class	Time frame	Responsibility	Action	Phase
						as condoms, as well as provide means counselling for those that are affected by HIV/AIDS and other STDs	
Land use change	The existing environment will drastically change from a dormant piece of land to a recreation facility facility.	• Sudden change in landscape appearances may be unfavourable to the conservatives.	• Social • Terrestrial environment	Project lifetime	• Environmental Control Officer • Project Manger	• The development should blend into the existing area through designing and colour coding. • Green designing will bring life to the site and blend with surrounding areas.	**Construction and operation**
Resources consumption	The construction industry can be resource intensive, i.e. water resources.	The project can result in a strain on available water resources, however also generating clean energy/electricity.	Socio-economic	Project lifetime	• Environmental Control Officer • Project Manger	Water saving should be ensured by the site manager i.e. repairing leakages, opening taps only when water is	**Construction and operation**

Impact	Description	Effects	Class	Time frame	Responsibility	Action	Phase
						required and recycling of water on site.	
Movement of vehicles within the site and along main road	Traffic and road safety	• Road Accidents • Damage to roads	• Safety • Socio-economic	Project lifetime	• Environmental Control Officer • Project Manger	• Traffic signs and symbols should be used at all necessary points along the roads. • Schedule construction work to allow for the movement of material and heavy equipment. • Arrange for parking and storage of material onsite where feasible. • Schedule vehicle movement to minimize disruption to traffic flow along	**Construction and operation**

Impact	Description	Effects	Class	Time frame	Responsibility	Action	Phase
						the main and access roads. • Make provision for handling peak traffic flows. • Identify traffic hazards and mitigate them • All drivers should be competent and with defensive driving certificates. • Make use of road worthy vehicles. • Ensure that all traffic safety measures are put in place. • Raise safety awareness in the communities	

Impact	Description	Effects	Class	Time frame	Responsibility	Action	Phase
						• Carry periodic road maintenance work.	
Infrastructure (e.g. Power lines, highway) that run close to the project site	Disruption of socio-economic activities of the surrounding local land users	• Failure in service provision e.g. electrical power supply failure;	Socio-economic	Project lifetime	• Environmental Control Officer • Project Manger	• Consultation with relevant authorities and departments for best possible actions to take. • Do not extend operations to areas close to the infrastructure until everyone affected is involved. • Mapping of all infrastructure and establishment of appropriate servitudes • Do a risk assessment for the	**Construction and operation**

Impact	Description	Effects	Class	Time frame	Responsibility	Action	Phase
						site and manage the risks	
Water resources use	Over abstraction (water demand and availability)	• Water supply agreements Proof/ recording/ quantification of water saving efforts. Water supplier - Water permits - inspection of water storage tanks on site	Social	Project lifetime	• Site Engineer • ECO	-Drinking water abstracted from boreholes or supplied by carting should be used efficiently, and recycling and re-using of water on certain site activities should be encouraged, where necessary and possible. -A Borehole Drilling and Groundwater Abstraction permits should be applied for the Department of Water Affairs at MAWLR, should the Proponent consider	**Construction & Operational**

Impact	Description	Effects	Class	Time frame	Responsibility	Action	Phase
						drilling new water supply boreholes. - The Proponent should consider carting water for drilling from elsewhere outside the site area such as Maltahohe to relieve pressure of the available resources. Agreements of water supply should be made between the willing water supplier and the Proponent. - Water reuse/recycling methods should be implemented as far as practicable such that the water used for the cleaning of project	

Impact	Description	Effects	Class	Time frame	Responsibility	Action	Phase
						equipment, if possible. -Water storage tanks should be inspected daily to ensure that there is no leakage, resulting in wasted water on site. Water conservation awareness and saving measures training should be provided to all the project workers in both phases so that they understand the importance of conserving water and become accountable.	
Archaeology and Heritage	The chances of discovering archaeological significant	• Presence or unearthing of archaeological or	Social	Through out the project	• ECO • Archeologist	Incase any archeological significant structure or object is discovered,	Throughout the operational phase

Impact	Description	Effects	Class	Time frame	Responsibility	Action	Phase
	structure / objects are there	cultural heritage resources				the proponent must cease all activities on site and wait for NHC to inspect site and give further instructions / actions. As stated in the appendix A attached in this document.	
Positive Impacts							
Employment creation	The development provides an opportunity of outsourcing work	Improves disposable income to those employed and their immediate families.	Socio-economic	Project lifetime	Project Manger	Work with local leadership (councillor) on acquiring non-skilled labour from the residents.	**Construction and operation**
Business linkages	Raw materials acquiring and contracting companies provide an	• Local suppliers will be presented with an opportunity to empower their businesses.	Socio-economic	Project lifetime	Project Manger	The proponent will outsource most of its materials and services from the surrounding local community	**Construction and operation**

Impact	Description	Effects	Class	Time frame	Responsibility	Action	Phase
	opportunity for businesses.	• Construction workers can be provided with accommodation, food and services from the local community increasing business activities.					
Infrastructure development	The development presents a unique opportunity for infrastructure development	• Existing roads will be upgraded which will benefit the local community. • Development of the facilities will also pave way for future developers to grow interests in the area and result in ripple effects and quick growing of the area.	Socio-economic	Project lifetime	Project manager	Development such as road upgrading will not only be limited up until the project site, but it will be extended to service other the connecting roads when there is need.	**Construction and operation**

Impact	Description	Effects	Class	Time frame	Responsibility	Action	Phase
Climate smart energy	The project is towards clean energy production and is highly beneficial to the country and the continent at large.	Alternative clean energy generation	• Socio-economic • Environmental	Operation phase	Project manager	It is recommended that the project once it takes off, a second phase development be implemented in order to expand operations.	**Operation**

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1.5 ENVIRONMENTAL MONITORING PLAN

Monitoring is very important for identifying the success of mitigation measures formulated for the significant impacts identified. Monitoring of activities will identify impacts that have not been foreseen and give enough time to analyse the situation and formulate measures to minimise impacts. Survey records and results must be maintained for these monitoring and inspections, highlighting any problems and the measures taken to address it.

Prior to site preparation and construction activities, the main contractor should present an environmental monitoring plan (including, *inter alia*, location of construction camp and toilet facilities, location of material storage areas, solid waste management plan, dust control measures, activity schedule, etc.) for review and approval by the DEA, the environmental control officer and the project manager. The developer should present a landscape plan and the trees/vegetation earmarked for protection should be flagged and hoarded by the contractor.

The entity selected to carry out environmental monitoring of the construction works should then prepare an environmental monitoring programme based on the above, the requirements of the EIA, and conditions of the development permit. The major elements of the environmental impact monitoring programme to be implemented during the construction phase of the project are as follows:

- Site clearance to ensure that trees marked for protection are left untouched and that large areas of soil are not left exposed and uncovered for extended periods of time.
- Site drainage and surface runoff, especially during and shortly after major rainfall events, to ensure there is no flooding, ponding and runoff of surface water Compliance of construction works with site management and landscape plans.
- Ensure transportation of earth materials is done by covered trucks and from approved sites.
- The contractor must immediately and completely clean up spills of materials in public areas.
- Solid waste disposal practices to ensure appropriate on-site management and final disposal at approved dump.

2 CONCLUSION AND RECOMMENDATIONS

The Environmental Impact Assessment process for the proposed development and operation of Sossusvlei shuttle service within the Namib Naukluft National Park , Hardap Region - Namibia was conducted in accordance to the Environmental Management Act 2007 and EMA Regulation 2012. Further consideration was given to relevant legislation throughout the entire process to ensure a successful assessment process.

Impacts likely to occur during project phases (construction and operation) were assessed depicting a positive outlook despite limited details of the magnitude of the proposed development. Based on the assessment, the overall project is less damaging to the environment demonstrating improved health provision, food security, high job creation opportunities and community development. Impacts with negative effects were also identified and summarized in a form of environmental management plan to ensure sustainable implementation.

The site has access to services such as electricity and roads for accessibility. Adding on the site has minimal vegetation such that no trees will be removed during the construction phase. It is important that the proponent observe and maintain accountability to both socio-economic and environmental sensitive activities from the project, such that the project is harmonized with policy, regulations, administrative frameworks and social interface with the public as proposed in the environmental management plan. Failure to observe these measures will significantly affect the local environment and lead to non-compliance. Therefore, implementation environmental protection measures should be executed in consultation with the key stakeholders.

JBIC cc hereby recommends that MET: DEA grant the environmental clearance certificate for the proposed development and operational of Sossusvlei shuttle service within the Namib Naukluft National park in the Hardap Region - Namibia, under the condition of full implementation of the project's EMP.

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APPENDIX 1: CHANCE FINDS PROCEDURE (AFTER KINAHAN, 2020)

Areas of proposed development activity are subject to heritage survey and assessment at the planning stage. These surveys are based on surface indications alone, and it is therefore possible that sites or items of heritage significance will be found during development work. The procedure set out here covers the reporting and management of such finds.

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

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

- National Heritage Council of Namibia (061 244 375 / Technical Office +264 61 301 903)
- National Museum (061 276800),
- National Forensic Laboratory (061 240461).

Archaeological material must NOT be touched. Tempering with the materials is an offence under the heritage act and punishable upon conviction by the law.

Responsibility:

Operator:	To exercise due caution if archaeological remains are found
Foreman:	To secure site and advise management timeously
Superintendent:	To determine safe working boundary and request inspection
Archaeologist:	To inspect, identify, advice management, and recover remains

Procedure:

<u>Action by person identifying archaeological or heritage material:</u>

a) If operating machinery or equipment stop work

b) Identify the site with flag tape

c) Determine GPS position if possible

d) Report findings to foreman

Action by foreman

a) Report findings, site location and actions taken to superintendent

b) Cease any works in immediate vicinity

Action by superintendent

a) Visit site and determine whether work can proceed without damage to findings

b) Determine and mark exclusion boundary

c) Site location and details to be added to project GIS for field confirmation by archaeologist

Action by Archaeologist

a) Inspect site and confirm addition to project GIS

b) Advise NHC and request written permission to remove findings from work area

c) Recovery, packaging and labelling of findings for transfer to National Museum

In the event of discovering human remains

a) Actions as above

b) Field inspection by archaeologist to confirm that remains are human

c) Advise and liaise with NHC and Police

d) Recovery of remains and removal to National Museum or National Forensic Laboratory, as direct

APPENDICES

Appendix A: Public Consultation Documents

1. Background Information Document
2. Newspaper Adverts
3. Site Notice
4. Meeting Attendance Register
5. Meeting Presentation
6. Questionnaires

Appendix B: Site Information

1. Approvals/licenses
2. Land Ownership
3. Locality Map

Appendix C: Consultancy Team resumes