

## ENVIRONMENTAL SCOPING REPORT (ESR)



(Source: TEC, 2024)

### FOR THE PROPOSED DRILLING AND WATER INFRASTRUCTURE DEVELOPMENT AT OKOMENJEIUMUE VILLAGE, KUNENE REGION

*Prepared for:*



**JANUARY 2025**



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| <b>ECC Application Reference number</b>  | <b>APP- 00</b>  |                               |
| <b>Listed Activity</b>   | <b>Activity 8: Water Resource Development</b><br>8.1 The abstraction of ground or surface water for industrial or commercial purposes |                               |
| <b>Location</b>  | Okomenjeiumue Village, Ombombo Masitu Conservancy   |                               |
| <b>Proponent</b>   | Ombombo Masitu Conservancy with support from Community Conservation Fund of Namibia (CCFN)<br>P. O. Box 169, Opuwo                    |                               |
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## ABBREVIATIONS

|       |   |
|-------|---|
| DEA   | Department of Environmental Affairs           |
| DSR   | Draft Scoping Report                          |
| CCFN  | Community Conservation Fund of Namibia        |
| EA    | Environmental Assessment                      |
| EAP   | Environmental Assessment Practitioner         |
| ECC   | Environmental Clearance Certificate           |
| ECO   | Environmental Compliance Officer              |
| EIA   | Environmental Impact Assessment               |
| EIF   | Environmental Investment Fund                 |
| EMA   | Environmental Management Act (No. 7 of 2007)  |
| EMP   | Environmental Management Plan                 |
| ESR   | Environmental Scoping Report                  |
| I&APs | Interested and Affected Parties               |
| MEFT  | Ministry of Environment, Forestry and Tourism |
| SM    | Site Manager                                  |
| TEC   | Tortoise Environmental Consultant             |

## 1. INTRODUCTION

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### 1.1 Terms of Reference

The Ministry of Environment, Forestry, and Tourism (MEFT) appointed CCFN as the Project Executing Agency (PEA) for the management of a project titled "Poverty Oriented Support to Communal Conservation in Namibia." The project's primary objective is to promote biodiversity conservation and rural development by establishing sustainable Human-Wildlife-Conflict (HWC) management systems within Namibia's communal conservancies.

Tortoise Environmental Consultants has been contracted to carry out Environmental Scoping Studies and Develop Environmental Management Plans for the drilling of seven (7) boreholes and associated water infrastructure development in six (6) conservancies, in the Kunene region.

### 1.2 Project Rationale

The Kunene region experiences severe drought, with annual rainfall as low as 100 – 300 mm (OPM, 2008), making it one of the most affected areas in the country (DRFN and KULIMA, 2017). This extreme aridity renders the region highly vulnerable to droughts, which severely impact livestock and community livelihoods (Mendelson, 2010).

The request for a borehole was motivated by a need to provide water in predominantly wildlife areas, where they are planning to develop tourism enterprises. The two areas for which the application is made are currently uninhabited by people and no domestic livestock could be observed in the area.

The plan is to supply this much needed tourism development with water as well as wildlife that frequently traverse in the including elephants. Permanent human settlements in this area are about 7 kilometres away from this site and the conservancy has secured this area as per their demarcation for wildlife and tourism development.

In summary, it is hoped that the proposed project will:

1. Provide drinking water to wildlife and avoid potential human-wildlife conflicts in the area
2. Attract wildlife back into the village.
3. Allow for the establishment of various tourism developments such as campsites in the area = income for the conservancy.

### 1.3 EIA Regulation

The EIA is regulated by the Environmental Management Act, 2007 and the EIA Regulations No. 30 of 2012, which is administered by the Ministry of Environment Forestry and Tourism (MEFT), through the Department of Environmental Affairs (DEA), which is headed by the Environmental Commissioner (EC).

### 1.4 Listed Activities

The proposed project triggers a number of Listed Activities as set out in the Environmental Management Act, 2007 (Act No. 7 of 2007) (herein referred to as the EMA) and the Environmental Impact Assessment Regulation, 2007 (No. 30 of 2011) (herein referred to as the EIA Regulations).

Listed Activities may not be undertaken without an Environmental Clearance Certificate (ECC), and hence an Environmental Impact Assessment (EIA) is required. The EIA entails the development of the EIA Scoping Report and Environmental Management Plan (EMP) which should be submitted to the MET as part of the application for the ECC.

**Table 1-1.1: Listed Activities triggered by the proposed project**

| Listed Activity                           | Activity Description   | Relevance to the proposed project                            |
|---|--|--|
| Activity 8<br>Water Resource Developments | 8.1 The abstraction of ground or surface water for industrial or commercial purposes | The proposed project involves underground water abstraction. |

## 1.5 What is an Environmental Impact Assessment?

An Environmental Impact Assessment (EIA) is a tool to manage negative environmental impacts that may arise from the proposed development and guides the project design to be more environmental friendly.

The aim of the EIA is to reduce negative impacts (effects) and maximise positive impacts, through the adoption of best environmental practices and application of the precautionary principle.

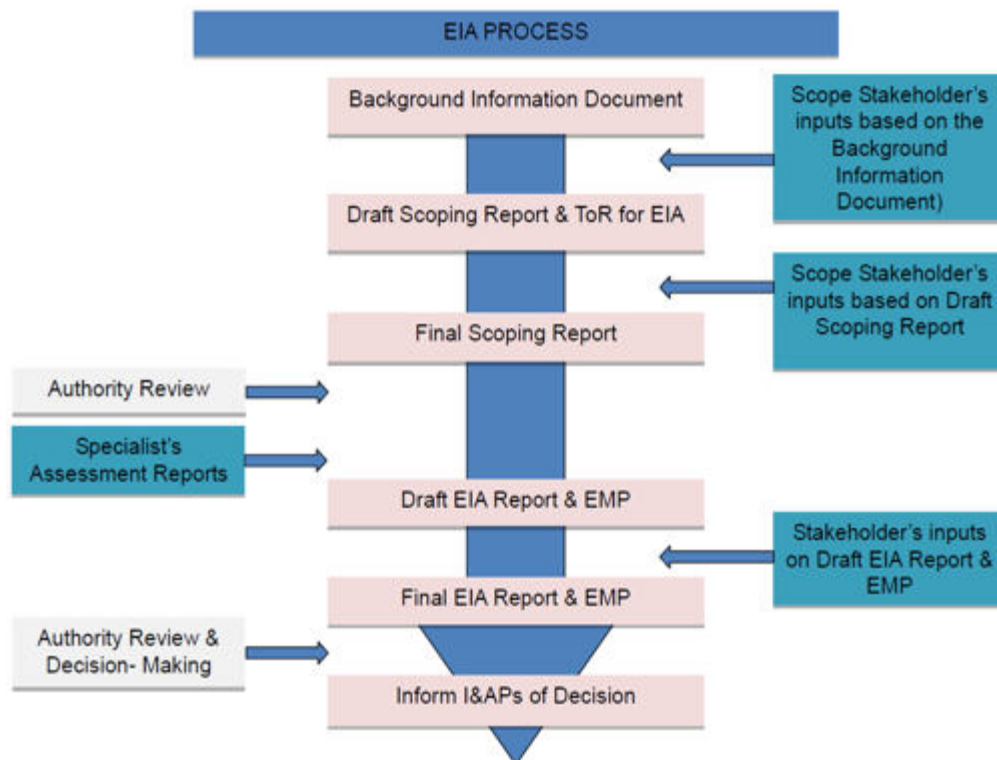
### 1.5.1 EIA and EMP Requirements

According to the Environmental Management Act (EMA), Act. No. 7 of 2007 (and the EIA Regulations (GN. No. 30 of 2012), underground water abstraction is a listed activity and an Environmental Impact Assessment (EIA) is required in order to obtain an Environmental Clearance Certificate (ECC) from the Ministry of Environment, Forestry and Tourism (MET) before the commencement of the proposed drilling and water infrastructure development.

### 1.5.2 EIA Process

An EIA is a systematic process of identifying, predicting, evaluating and mitigating the potential environmental and social effects that may arise from the activities of a proposed project.

For the proposed drilling and water infrastructure development in Okomenjeiumue village, the EIA presents the findings of the assessment for potential impacts that may arise from the construction and operation of the proposed project and recommends remedial measures that should be undertaken to mitigate the effects of the proposed activity on the environment (Figure 1.1).



**Figure 1-1: EIA flow diagram**

### 1.5.3 Identification and Mitigation of Impacts

The backbone of the EIA report entails identification of impacts (whether real or perceived) and recommendations on suitable mitigation measures to ensure compliance with the principles of environmental management and highlight risks and measures to ensure an environmentally friendly development.

### 1.5.4 Purpose of the EIA Scoping Exercise

The purpose of this EIA scoping exercise is to:

- Provide description of the proposed activity;
- Describe the affected environment (proposed area),
- Identify potential environmental impacts / aspects of concern;
- Describe the methodology followed to assess the potential impacts;
- Address concerns raised by stakeholders in the Comments and Response Report – CRR);
- Mitigate negative impacts that may arise from the proposed project

### 1.5.5 Public Participation Process (PPP)

The EIA process is underpinned by public and stakeholder consultations. Comments made during the public participation should be properly captured and addressed in the EIA Scoping report and EMP respectively.

Consultation with the public forms an integral component of the EIA process. The Public Participation Process (PPP) allows Interested and Affected Parties (I&APs) to raise issues and concerns related to the proposed project which they feel should be considered in the EIA process and development of the project. The environmental assessment identifies feasible mitigation measures that can be implemented to address the identified issues of concern.

The following activities and documents are required in accordance with the EMA:

- Two Newspaper articles
- Site notices
- Development and circulation of the Background information document
- Public meeting
- Scoping Report

Interested and Affected Parties (I&APs) that may be consulted upon during the PPP may include, but not limited to communities, national, regional and local authorities, environmental groups and civic associations.

The PPP undertaken for the proposed project is detailed in Chapter 5.

#### **1.5.6 Rehabilitation**

The EIA should not only focus on mitigating the impacts of the activity during the active operations but also should go further and recommend rehabilitation measures at project closure (when activities cease). Rehabilitation measures should not be parked waiting for project closure but should be implemented incrementally throughout the project lifespan.

#### **1.5.7 Environmental Management Plan (EMP)**

In-addition to the EIA Scoping Report, an Environmental Management Plan (EMP) is required under the EMA as part of the ECC application. The EMP is key document and consists of the set of measures to be taken during implementation and operation to eliminate, offset, or reduce adverse environmental impacts to acceptable levels. Also included in the plan are the actions needed to implement them (Ministry of Environment and Tourism, 2008).

The EMP has been developed and is attached to the ESR.

#### **1.5.8 Application for ECC**

Upon completion, the EIA Scoping Report and Environmental Management Plan (EMP), will be submitted to MEFT for review and decision, in accordance with Section 8 of the EIA Regulations.

## **1.6 Scope and Purpose of this Report**

The purpose of this report is to present the findings of the EIA for the proposed drilling and water infrastructure development, as part of the application of the Environmental Clearance Certificate (ECC).

The environmental assessment has been undertaken in accordance with the requirements of the Environmental Management Act, 2007 and the EIA Regulations.

## **1.7 Environmental Assessment Practitioner**

Tortoise Environmental Consultants (TEC) has been appointed to carry out the requisite Environmental Impact Assessment (EIA) and develop an Environmental Management Plan (EMP), as part of the application for an Environmental Clearance (EC) for the envisaged drilling and water infrastructure development.

## **1.8 Alternatives Considered**

As stipulated in the Environmental Management Act (EMA) and EIA regulations, alternatives should be considered during the project design, to determine if an alternative site (different locality) or alternative project (different project) would yield better socio-economic benefits.

**No alternative sites have been identified or considered for this project.**

## 2. PROJECT INFORMATION

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### 2.1 Project Location – Okomenjeiumue Village

The Okomenjeiumue Village is located in Ombombo Masitu Conservancy in Kunene region.

Location: GPS coordinates: Latitude -17.901733 and Longitude 13.871300



Figure 2-1: Okomenjeiumue borehole site

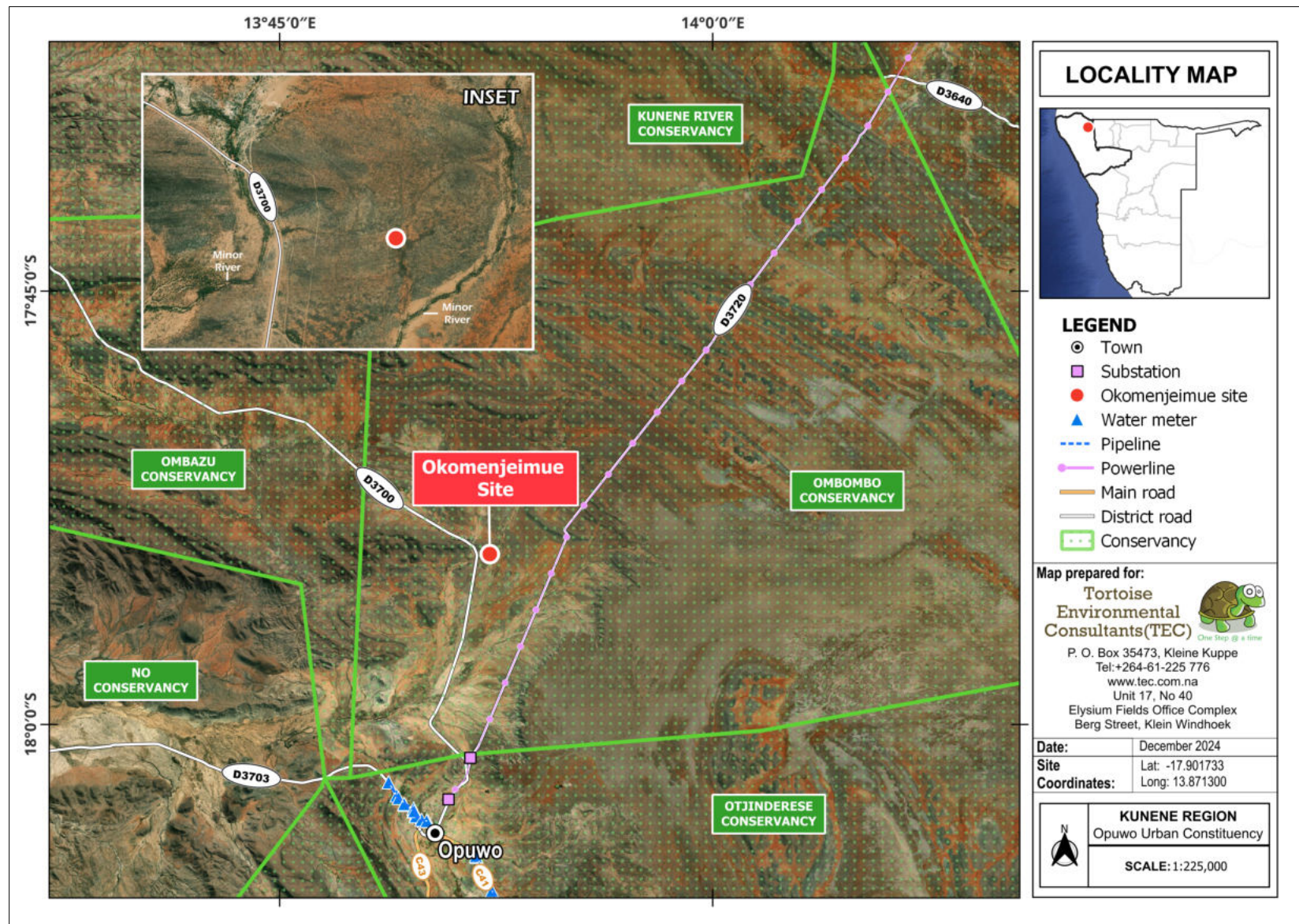


Figure 2-2: Locality map of proposed borehole site in Okomenjeimue Village

## 2.2 Water Demand – Overview

The request for a borehole was motivated by a need to provide water in predominantly wildlife areas, where they are planning to develop tourism enterprises. The two areas for which the application is made are currently uninhabited by people and no domestic livestock could be observed in the area.

This is presented in Table 2.1 below.

**Table 2-1: Water demand in the village**

| Water User                   | Quantity/Units | Water demand per unit (L) | Water demand per day (L) |
|------------------------------|----------------|---------------------------|--------------------------|
| People (Occasionally)        | 20             | 50                        | 1000                     |
| Wildlife (mix)               | 200            | 15(avg)                   | 3000                     |
| Livestock mix (Occasionally) | 200            | 35(avg)                   | 7000                     |
| <b>Total</b>                 |                |                           | <b>11000</b>             |

## 2.3 Existing water source

There is no existing water source in the area.

## 2.4 Proposed development

**Table 2-2: Proposed water infrastructure development at Okomenjeimue**

| Area Description  | Proposed/desired intervention  |
|---|--|
| <ul style="list-style-type: none"> <li>• Wild uninhabited area</li> <li>• No visible domestic livestock grazing the area</li> <li>• Abundant grass cover</li> <li>• Wildlife tracks and signs visible</li> <li>• Very distant location from villages</li> </ul> | <ul style="list-style-type: none"> <li>• Improve access road to the site (bush clearing and removing stumps)</li> <li>• Borehole drilling</li> <li>• Install water storage facilities</li> <li>• Build wildlife troughs</li> </ul> |

### 3. LEGAL FRAMEWORK

This chapter outlines the regulatory framework applicable to the proposed project. Table 3.1 provides an overview of applicable policies, plans and strategies and Table 3.2 provides a list of applicable national legislation.

**Table 3-1.1: Policies, Plans and Strategies**

| Policy / Plan   | Relevancy/Summary  | Applicability to the Proposed Project  |
|---|--|--|
| 5 <sup>th</sup> National Development Plan (NDP) and Vision 2030 | Outlines the country's national development ambitions, in line with the Harambee Prosperity Plan, and Vision 2030. NDP5 incorporates the principles and recommendations contained in the Stockholm Declaration on the Human Environment (1972) and associated Action Plan, as well as Agenda 21 which merged from the Convention on Biological Diversity, Rio De Janeiro (1992). | The proposed project is a development that forms part of the bigger picture of achieving economic progression, social transformation and environmental sustainability. |

**Table 3.2: National Statutes**

| National Statutes   | Relevance/Summary  | Applicability to the Proposed Project  |
|---|--|--|
| Environmental Management Act, 2007 (Act No. 7 of 2007) and associated regulations, including the Environmental Impact Assessment Regulation, 2007 (No. 30 of 2011). | <p>The Act aims to promote sustainable management of the environment and the use of natural resources by establishing principles for decision-making on matters affecting the environment.</p> <p>It sets the principles of environmental management as well as the functions and powers of the Minister. The Act requires certain activities to obtain an environmental clearance certificate before project development.</p> <p>The Act states that an EIA may be undertaken and submitted as part of the environmental clearance certificate application.</p> | <p>This EIA report (and EMP) documents the findings of the EIA process undertaken for the proposed project, which will form part of the environmental clearance application.</p> <p>The EIA process and associated report have been undertaken in line with the requirements under the Act and associated regulations.</p> |



| National Statutes  | Relevance/Summary   | Applicability to the Proposed Project  |
|--|---|--|
| Revised National Policy on Human Wildlife Conflict Management (HWCM) | The National Policy on Human Wildlife Conflict Management was developed in 2009 to manage human-wildlife conflict and advance socio-economic developmental needs for rural communities. The policy was revised in 2018 to enhance the HWC mitigation measures.  | <p>By drilling a new borehole, this project aligns with the policy's goal of minimizing human-wildlife conflicts by providing a separate, reliable water source that benefits both the community and wildlife.</p> <p>Ensuring that wildlife, such as elephants, have access to sufficient water reduces their encroachment into the homesteads, reducing potential damage to infrastructure and preventing harm to both people and animals.</p> |
| Water Act, 1956  | This rather out-dated Act that remains in force, provides for the control, conservation and use of water for domestic, agricultural, urban and industrial purposes; to make provision for the control, in certain respects, of the use of sea water for certain purposes; and for the control of certain activities on or in water in certain areas. The Ministry of Agriculture, Water and Land Reform (MAWLR) Department of Water Affairs is responsible for administration of the Water Act. | <p>Water pollution is an offence as per Section 23 of the Water Act.</p> <p>The Act stipulates obligations in Part 13 of general provisions relating to water pollution and prohibits the discharge of wastewater, effluent or waste without licence and sets forth specific requirements for such licence.</p> <p>The EMP sets out measures to avoid polluting the environment.</p>   |
| Water Resources Management Act 2004 (Act No. 24 of 2004)             | <p>Whilst approved and published in the Government Gazette, it is not legally enforced.</p> <p>Based on the National Water Policy and provided for the management, development, protection, conservation, and use of water resources; and it established the Water Advisory Council, the Water</p>  | <p>Whilst not in operation, it is best practice to adhere to the conditions in this Act.</p> <p>The 2013 Act would repeal this Act, therefore conditions in the 2013 Act have been reviewed.</p>   |



| National Statutes   | Relevance/Summary   | Applicability to the Proposed Project  |
|---|---|--|
|   | Regulatory Board and the Water Tribunal   |  |
| Water Resources Management Act, 2013 (No. 11 of 2013)   | <p>Whilst enacted it has not yet come into operation, and needs approval from the Government.</p> <p>This Act provides a framework for managing water resources based on the principles of integrated water resource management. It provides for the management, protection, development, use and conservation of water resource, and for the regulation and monitoring of water services and for incidental matters</p>  | <p>Whilst not in operation, it is best practice to adhere to the conditions in this Act.</p> <p>The Act sets out obligations in order to avoid water pollution Section 44 stipulates the requirements for a licence to be held for the abstraction and use of water.</p> <p>These have been incorporated into the EMP to minimise water pollution.</p>   |
| Soil Conservation, 1969 (Act 76 of 1969) and the Soil Conservation Amendment Act (Act 38 of 1971) | Makes provision for the prevention and control of soil erosion and the protection, improvement and the conservation, improvement and manner of use of the soil and vegetation.  | Through vegetation removal there may be the risk of affecting soil quality. Measures shall be taken to avoid this which are set out in the EMP.  |
| Forest Act 12 of 2001<br>Forest Act Regulations 2015  | <p>To provide for the protection of the environment and the control and management of forest.</p> <p>The Act and Regulations have the following stipulations that may be relevant to the proposed project:</p> <ul style="list-style-type: none"> <li>- Approval from the Director may be required for the clearance of vegetation on more than 15 hectares (Section 23, subsection 1 (b)).</li> <li>- Tree species and any vegetation within 100m from a watercourse may not be removed without a permit (Section 22, subsection 1 (b))</li> <li>- Provision for the protection of various plant species. This includes the proclamation of protected species of plants and the conditions under which these plants can be disturbed, conserved, or cultivated.</li> </ul> | <p>There may be some vegetation removal as part of the proposed project.</p> <p>There is no vegetation falling within 100m of the river, no permit shall be obtained prior to clearance.</p> <p>The proponent shall undertake all activities in line with the conditions stipulated in the Permit and a valid permit shall be obtained throughout vegetation clearance activities. It is unlikely that a permit shall be required.</p> |



| National Statutes                      | Relevance/Summary  | Applicability to the Proposed Project  |
|--|--|--|
| National Heritage Act, No. 27 of 2004. | The Act provides for the protection and conservation of places and objects with heritage significance. | There is potential for heritage objects to be found on the development site, therefore the stipulations in the Act have been taken into consideration and are incorporated into the EMP. |

## **4. AFFECTED ENVIRONMENT**

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The environmental baseline for the proposed project has been collected through a desktop study as well as a site assessment.

### **4.1 Regional Baseline**

#### **4.1.1 Socio-economic**

The majority of the population within the region live in rural areas. Raising cattle, sheep, and goats is the primary source of income in the Kunene region. Thus, farming is a challenging business, and because farmland is rarely productive, animal concentrations are typically low (Mwinga et al., 2022). Additionally, the landscape is outside the veterinary cordon fence, which regulates animal movement as a preventative precaution against foot and mouth disease. However, the practice of raising livestock is becoming increasingly risky due to the frequent, extended droughts.

During the prolonged drought that has been occurring since 2012—2016 being especially bad—farmers have lost a great deal of cattle. Water is another significant constraint because the landscape is solely dependent on diminishing subterranean water sources that can only be reached by deep boreholes, except for the Epupa Constituency, which has access to the Kunene River.

#### **4.1.2 Climate**

Kunene's rainfall is often low and extremely erratic, resulting in years of heavy rain followed by extreme dry weather. The yearly average rainfall varies from 0mm on the coast to 340mm in the east (Environmental Investment Fund, n.d).

Except for 2022, the Kunene region has had a prolonged drought for the last ten years (Mwinga et al., 2022). Farmers were thus compelled by the circumstances to relocate from their communities to places where there was greater pasture available for their animals. Many goats and animals have died over the years, leaving most people without any source of income.

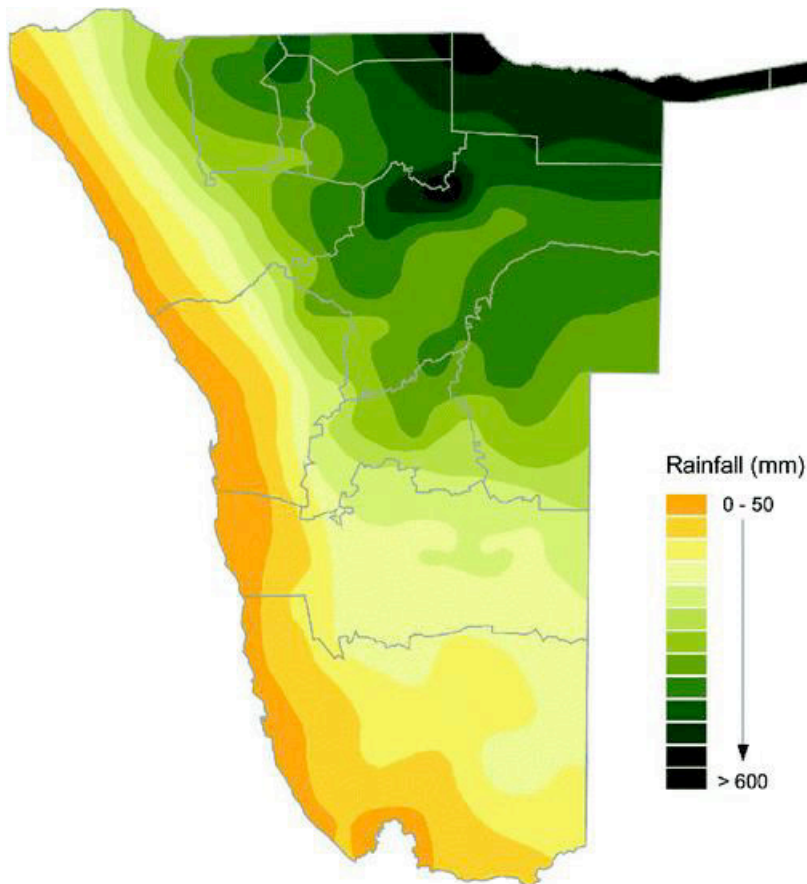


Figure 4-1: Namibia Rainfall Pattern (First Capital Namibia, 2022)

#### 4.1.3 Topography, Landscape and Soils

The natural mountainous scenery, rocks, minerals, soil, underground water, springs, and rivers are the region's most significant resources (Mwinga, et al., 2022). Rock formations offer some mining opportunities, which may benefit the region economically (Mwinga, et al., 2022). Furthermore, the soil, underground aquifers, springs, and perennial rivers all have a significant impact on food production and tourism in the region Kunene Region is a natural wonderland stretching back 250 million years, with fascinating and vividly visible rock formations (Mwinga, et al., 2022). The region has a diverse range of rock formations, commonly found in valleys, escarpments, mountains, and plains.

#### 4.1.4 Surface and groundwater

The Kunene region is located within the hydrogeological regions of Kaokoveld and Northern Namib (Figure 4.2) (Salom, 2023). The region has generally low groundwater potential and the area with aquifer potential exhibits rainfall characteristics diminishing westwards (Lohe et. al., 2021). The region is well-known for the many springs that the Sesfontein push created, but due to the low number of drilled boreholes and the paucity of groundwater research conducted in the area, little is known about the properties of the aquifer in this region (Lohe et al., 2021).

Although groundwater potential is largely determined by recharge from rainfall, groundwater potential is also influenced by the degree of metamorphism (Lohe et al., 2021).

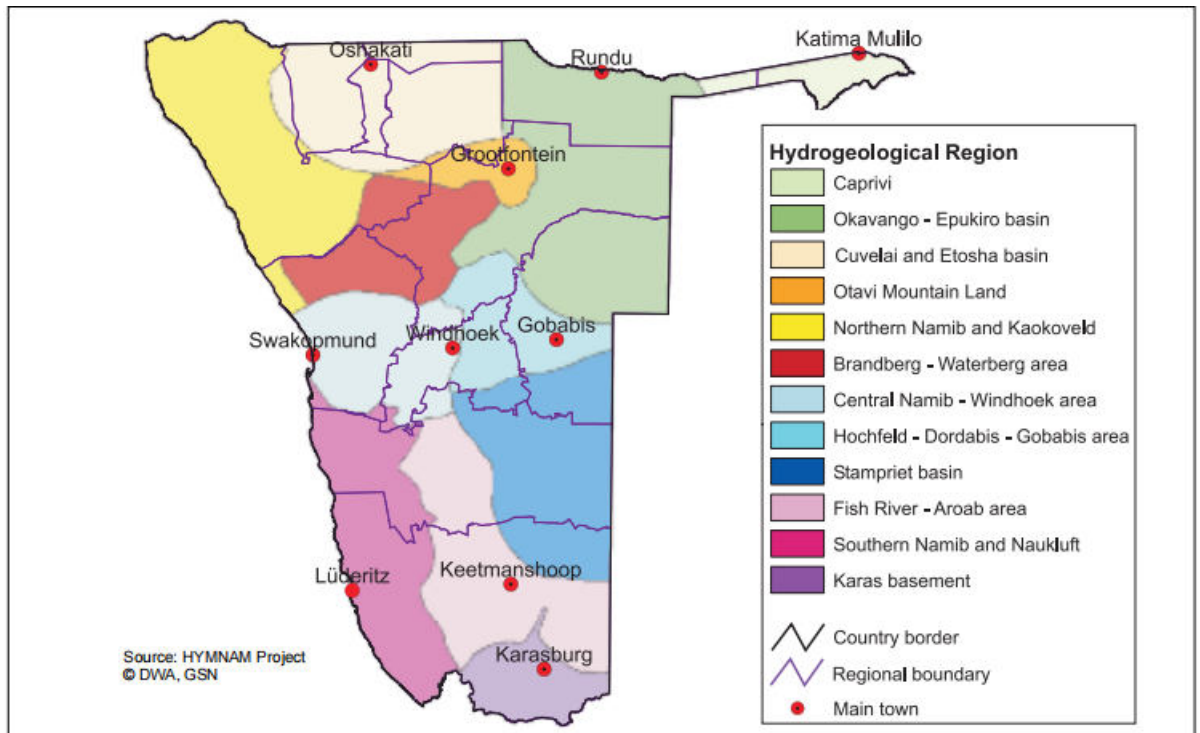


Figure 4-2: Hydrogeology of the Study area (Christellis et al, 2001)

#### 4.1.5 Vegetation

The Kunene region is primarily covered in mixed woodlands with various species of *Acacia*, *Cammiphora*, *Terminalia*, and *Mopane savanna* (*colophospermum mopane*). This landscape area also has grass species like *Stipagrostis* spp. and Bushman grass (EIF, n.d).

#### 4.1.6 Wildlife

From an evolutionary perspective, the biodiversity of this area has been significantly impacted by the long history of aridity experienced by this region (CCFN, 2020). It has continued to be a reasonably stable center for the development of species found in dry savanna and the desert, leading to the emergence of distinct assemblages with high endemism and a variety of sophisticated adaptations to arid environments (Lovegrove 1993).

The area's megafauna includes black rhinos, giraffes, and elephants that have adapted to live in the desert (CCFN, 2020). These animals live in riverbeds and use trees like *Faidherbia albida* (Joubert and Mostert 1975). There is no other unfenced black rhino population in the world except the one in this region. The area is home to several other species, including black-faced impala, kudu, springbok, gemsbok, and Hartmann's mountain zebra (CCFN, 2020). Among the predators are lions, cheetahs, and brown spotted hyena.

## 5. PUBLIC PARTICIPATION PROCESS

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Public consultation is a requirement by law (EMA No 7 of 2007) to be incorporated into an EIA process, hence it is a fundamental part of the EIA. Public consultation ensures robust decision-making by involving Interested and Affected Parties (I&APs).

The PPP has therefore been structured to provide I&APs an opportunity to gain more information on the proposed project and for them to provide inputs through the review of documents/reports, and to flag any issue of concern during the PPP process.

### 5.1 Authority Consultation

Consultations were done with the Ombombo Masitu Conservancy during the EIA field assessment exercise, through which due information and documentation were provided to the Environmental Assessment Practitioner (EAP).

### 5.2 Newspaper Adverts

Section 21 (c), stipulates that ECC applications should be advertised once a week for two consecutive weeks in two newspapers that are widely circulated in Namibia.

However, due to the remoteness of the village, the community was informed through the conservancy office.

### 5.3 Public Meetings – Free Prior Consent

Free Prior Informed Consent public meetings were held at Okomenjeiumue village on the 26th November 2024. These consultations emphasised transparency, mutual respect and cultural sensitivity, ensuring that the proposed project aligns with the community's needs and values.

According to the Legal Assistance Centre (n.d), FPIC consists of the following elements which were all considered for this project:

- **Free:** Under Namibian law, consent is not considered valid if obtained through manipulation or coercion. It is therefore crucial to ensure that consent for development projects is given voluntarily. This requires that the responsibility for obtaining consent does not solely rest with the project developer or the State. Indigenous communities are required to actively participate in the process and have sufficient access to judicial remedies to safeguard their rights against potential harm.
- **Prior:** Consent must be obtained before the State issues final authorization for any project that could impact the rights, lands, territories or resources of indigenous people. The affected communities should be given adequate time to fully understand the information provided.



- **Informed:** The FPIC process requires meaningful consultation and participation by affected communities, facilitated by the comprehensive and accurate disclosure of information. According to the Convention on Biological Diversity's Working Group, this information should include the nature of the proposed project, size, scope, purpose, duration and the affected areas. Communities are also to receive preliminary assessments of the impacts of and details about those involved in its development. Full disclosure of potential risks, such as negative environmental impacts, disruptions to significant sites, must also be provided, along with a realistic outline of the project's foreseeable implications.
- **Consent:** Consent entails meaningful consultation and participation in all phases of the project, from initial planning to monitoring and eventual closure. Indigenous people must have the right to participate through representatives of their choice and identify any special measures necessary for effective inclusion. Additionally, they are allowed to seek advice or legal representation from experts of their choices.

## 6. IMPACT ASSESSMENT METHODOLOGY

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### 6.1 EIA Methodology

The EIA methodology applied to this EIA has been developed using the Namibian Draft Procedures and Guidance for EIA and EMP (Republic of Namibia, 2008); international and national best practice; and over 20 years of combined EIA experience. The method of each step in the EIA process is described in the next sections.

#### 6.1.1 Screening

As per the Draft Procedures and Guideline for Environmental Impact Assessment (EIA) and Environmental Management Plan (EMP) (Ministry of Environment and Tourism, 2008), the determination of a proposal and if it triggers a Listed Activity in the EMA is the first stage of the EIA process. The proposed project triggers several Listed Activities as per Section 1.4 and therefore an ECC is required.

#### 6.1.2 Scope of Assessment

The Scoping Process is a fundamental stage in the EIA process. Through a high-level assessment, the likely effects and severity of effects as a result of the development and operations of a proposed project can be identified. Any likely significant effects are taken forward for further assessment (detailed EIA). This stage is important in the EIA process to enable the assessment to be concise and focus on key issues that are central to efficient decision making.

If no likely significant effects are anticipated, a detailed EIA is not undertaken and a Scoping Report detailing the high-level assessment is submitted as part of the ECC application.

As there was uncertainty around the potential effects and their severity, a scoping process was undertaken for the proposed development. The Draft Procedures and Guideline for Environmental Impact Assessment (EIA) and Environmental Management Plan (EMP) (Ministry of Environment and Tourism, 2008) were followed to undertake the scoping stage.

The baseline environment that could be affected by the project was reviewed and potential effects on receptors identified. Receptors under the following aspects were considered (Ministry of Environment and Tourism, 2008):

- |   |                           |
|---|---------------------------|
| • Geology and soils                       | • Air quality             |
| • Topography                              | • Sound levels            |
| • Groundwater and surface water resources | • Socio-economics         |
| • Environmentally sensitive areas         | • Infrastructure services |
|   | • Cultural resources      |
|   | • Project Economics       |

Embedded mitigation and industry best practice measures were considered in the review and conclusion drawn identifying those effects that needed to be assessed further due to the potential severity and significance.

### 6.1.3 Detailed Impact Assessment

Through scoping, potential significant effects were identified. These potential effects are then considered further to determine the level of significance and identify additional mitigation required to avoid, reduce, or compensate for the effect.

### 6.1.4 Impact Significance

The level of significance is identified through the assessment process in order to understand the potential severity of the effect and identify appropriate mitigation. The significance of effect after mitigation is also considered during the decision-making.

The significance of an impact is determined by considering and measuring the temporal and spatial scales and magnitude of the project and the specific activities associated with the project.

### 6.1.5 Impact Assessment Criteria

For each impact, the **EXTENT** (spatial scale), **MAGNITUDE** and **DURATION** will be described. These criteria are used to ascertain the **SIGNIFICANCE** of the impact, firstly in the case of no mitigation and then with the most effective mitigation measure/s in place. The mitigation described in the Scoping Report and EMP would represent the full range of plausible and pragmatic measures.

**Table 6-1: Assessment criteria for the evaluation of impacts**

| CRITERIA   | CATEGORY        | DESCRIPTION  |
|--|-----------------|--|
| <b>Sensitivity or importance/value of receptor</b> | <b>High</b>     | Of value, importance or rarity on a national scale, and with very limited potential for substitution; and/or Very sensitive to change, or has little capacity to accommodate a change. |
|  | <b>Medium</b>   | Of value, importance or rarity on a regional scale, and with limited potential for substitution; and/or Moderate sensitivity to change, or moderate capacity to accommodate a change   |
|  | <b>Low</b>      | Of value, importance or rarity on a local scale; and/or Not particularly sensitive to change, or has considerable capacity to accommodate a change.                                    |
| <b>Extent or spatial influence of impact</b>       | <b>National</b> | Beyond a 20km radius of the site   |
|  | <b>Regional</b> | Within a 20 km radius of the site  |
|  | <b>Local</b>    | Within a 2 km radius of the centre of the site   |



| CRITERIA  | CATEGORY             | DESCRIPTION  |
|---|----------------------|--|
|   | <b>Site specific</b> | On site or within the boundaries of the property   |
|   | <b>Zero</b>          |  |
| <b>Magnitude of impact (at the indicated spatial scale)</b> | <b>High</b>          | Natural and/ or social functions and/ or processes are <i>severely</i> altered   |
|   | <b>Medium</b>        | Natural and/ or social functions and/ or processes are <i>notably</i> altered  |
|   | <b>Low</b>           | Natural and/ or social functions and/ or processes are <i>slightly</i> altered   |
|   | <b>Very Low</b>      | Natural and/ or social functions and/ or processes are <i>negligibly</i> altered   |
|   | <b>Zero</b>          | Natural and/ or social functions and/ or processes remain <i>unaltered</i>   |
| <b>Duration of impact</b>                                   | <b>Zero</b>          | Zero time  |
|   | <b>Short Term</b>    | Up to 18 months  |
|   | <b>Medium Term</b>   | 0-5 years (after operation)  |
|   | <b>Long Term</b>     | 5- 10 years (after operation)  |
|   | <b>Permanent</b>     | More than 10 years (after operation)   |
| <b>Probability</b>  | <b>Definite</b>      | Estimated greater than 95 % chance of the impact occurring.  |
|   | <b>Very likely</b>   | Estimated 50 to 95% chance of the impact occurring   |
|   | <b>Fairly likely</b> | Estimated 5 to 50 % chance of the impact occurring.  |
|   | <b>Unlikely</b>      | Estimated less than 5 % chance of the impact occurring.  |
|   | <b>Zero</b>          | Definitely no chance of occurrence   |
| <b>Confidence</b>   | <b>Certain</b>       | Wealth of information on and sound understanding of the environmental factors potentially influencing the impact.                              |
|   | <b>Sure</b>          | Reasonable amount of useful information on and relatively sound understanding of the environmental factors potentially influencing the impact. |
|   | <b>Unsure</b>        | Limited useful information on and understanding of the environmental factors potentially influencing this impact.                              |
| <b>Reversibility</b>  | <b>Irreversible</b>  | The activity will lead to an impact that is permanent.   |
|   | <b>Reversible</b>    | The impact is reversible, within a period of 10 years.   |

Significance is not defined in the EIA Regulations, however the Draft Procedure and Guidance for EIA and EMP states the significance of a predicted impact depends upon its context and intensity. Accordingly, the following have been applied in the environmental assessment, which is based on professional judgement:

- **High:** effects are considered to be key factors in the decision-making process. These are generally (but not exclusively) associated with sites and features of national importance and resources/features that are unique and which, if lost, cannot be replaced or relocated.
- **Medium:** effects are considered to be important factors but which are unlikely to be key decision-making factors.
- **Low:** effects are considered to be local factors that are unlikely to be critical to decision-making.

The significance of effect has been derived by applying the identified thresholds for receptor sensitivity and magnitude of change, as well as the definition for significance.

If effects of high significance are identified, the effects are considered to be significant. A further detailed EIA would be deemed appropriate for these effects, to further understand the consequences (through modelling or other assessment techniques) and required mitigation measures to reduce the effect.

## 6.2 Assessment of Cumulative Impacts

The Environmental Assessment Policy in Namibia requires cumulative environmental impacts to be considered in all environmental assessment processes.

Cumulative impacts can arise when a single resource or receptor is affected by more than one impact or activity of the proposed project. For example, the view of a local resident's property could be altered through the construction phase of the proposed development and noise levels could increase due to excavation activities. In isolation, the impacts may be insignificant, however when combined, the impacts on the local resident may result in a significant impact.

Cumulative impacts may also arise as a result of the combination of two or more projects on the same receptor. The receptor could be affected by the same activities of these projects resulting in the same impact or by completely different activities resulting in different impacts. An example of this is as follows; dust generated during the construction stage of the proposed project may not cause a significant effect in isolation; however, a sensitive receptor (e.g. local resident) may be significantly impacted when dust from the proposed project is combined with noise generated from other projects.

A high-level cumulative impact assessment has been undertaken for the proposed project as part of the scoping phase as the anticipated effects are expected to be local and of minor significance. If effects were determined to be significant, a detailed EIA would be required.

## 6.3 Mitigation Measures

For each impact assessed during the scoping phase and detailed assessment, mitigation measures are identified to reduce and/ or avoid negative impacts. These mitigation

measures are also incorporated in the EMP to ensure that they are implemented throughout the lifespan of the proposed project. The EMP forms part of the Scoping Report, and upon project approval, the implementation thereof, would become a binding requirement.

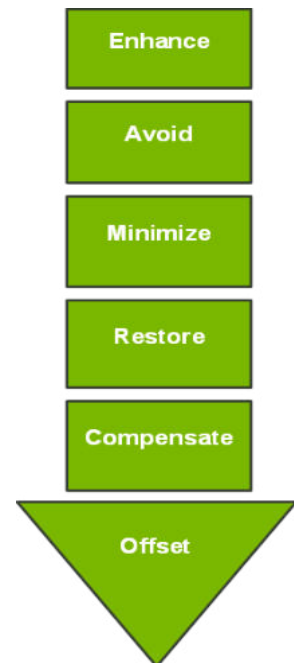
### 6.3.1 Mitigation Hierarchy

Actions to mitigate a potential impact can be done in as systematic manner as guided by what is referred to as Mitigation Hierarchy (Figure 4.1).

From the onset, the positive impacts of the proposed project should be **enhanced**, however, where an impact in is inevitable, the following sequence should be followed.

**Impact avoidance:** This step is most effective when applied at an early stage of project conceptualization and planning. It can be achieved by:

- Not undertaking certain projects or elements that could result in adverse impacts;
- Avoiding areas that are environmentally sensitive; and
- Putting in place preventative measures to stop adverse impacts from occurring.



**Figure 6-1 - Mitigation Hierarchy**

**Impact minimisation:** This step is usually taken during impact identification and prediction to limit or reduce the degree, extent, magnitude, or duration of adverse impacts. It can be achieved by:

- Scaling down or relocating the proposal;
- Redesigning elements of the project; and
- Taking supplementary measures to manage the impacts.

**Impact compensation:** This step is usually applied to remedy unavoidable residual adverse impacts. It can be achieved by:

- Rehabilitation of the affected site or environment, for example, by habitat enhancement;
- Restoration of the affected site or environment to its previous state or better; and
- Replacement of the same resource values at another location (off-set), for example, by wetland engineering to provide an equivalent area to that lost to drainage or infill.

## 7. ENVIRONMENT AND SOCIAL RISKS AND IMPACTS

### 7.1 Scoping Stage

This section presents the potential impacts that may arise from the proposed drilling activities. The full mitigation measures are presented in the EMP. The assessment includes potential risks to the environment, local ecosystems, and affected communities, to guide the development of mitigation strategies to minimize harm and maximize benefits.

**Table 7-1: Scoping Assessment Findings**

| Aspect  | Risk / No-Action  | Potential Effect   | Mitigation   |
|---|---|--|--|
| <b>Groundwater and surface water resources</b>  |   |  |  |
| Groundwater   | Abstraction of water during the operational phase of the project. | Over-abstraction   | Mitigation and management measures in the ESMP are deemed suitable to avoid and reduce impacts.  |
|   | Water ponding   | <ul style="list-style-type: none"> <li>• Ponded water can infiltrate the soil and potentially pollute groundwater.</li> <li>• Breeding ground for mosquitoes.</li> <li>• Can harbor harmful bacteria and pathogens, posing health risks to the surrounding community.</li> </ul> | <ul style="list-style-type: none"> <li>• Construct raised platforms around the water point to prevent ponding during rainfall or overflows.</li> </ul> |
| <b>Cumulative Effects</b>   |   |  |  |
| Cumulative effects refer to the combined impacts of the project when considered alongside existing, planned, or foreseeable developments in the area. For a water infrastructure upgrading project, such as improving hand-dug wells or installing solar-powered boreholes, these effects can be environmental, social, and economic. |   |  |  |

| Aspect   | Risk / No-Action | Potential Effect | Mitigation |
|--|------------------|------------------|------------|
| <p>The Environmental Assessment Policy in Namibia requires that cumulative impacts should be considered in all environmental assessment processes. However, EIAs have traditionally failed to account for cumulative impacts, largely as a result of the following considerations:</p> <ul style="list-style-type: none"> <li>- Cumulative effects may be local, regional or global in scale and dealing with such impacts requires coordinated institutional arrangements.</li> <li>- Environmental assessments are typically carried out on specific developments, whereas cumulative impacts result from broader biophysical, social and economic considerations, which may not always be practical to address at the project level.</li> </ul> |                  |                  |            |

## 8. CONCLUSION

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The environmental assessment undertaken by TEC followed specific EIA Methodology to identify if there is potential for significant effects to occur as a result of developing and operating the proposed project.

Through the scoping process, all social and environmental receptors were scoped out as it was unlikely that there would be significant effects.

Through further analysis and identification of mitigation and management methods, the assessment concluded that the likely effects on the terrestrial communities is expected to be of low significance.

Various best practice and mitigation measures have been identified to avoid and reduce effects as far as reasonably practicable across the proposed project, as well as ensure the environment is protected and unforeseen effects are avoided.

On this basis, it is of the opinion of TEC that an ECC could be issued, on conditions that the management and mitigation measures specified in the EMP are implemented and adhered to.

## REFERENCES

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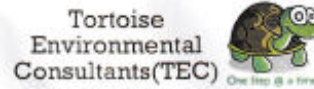
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## APPENDICES

### APPENDIX (1): Free Prior Informed Consent



26 November 2024

To Whom it May Concern:

Dear Sir / Madam

**SUBJECT: FREE PRIOR INFORMED CONSENT FOR THE PROPOSED DRILLING OF**

**A BOREHOLE AT Okomenyeimue VILLAGE IN**  
**Ombombo-masitu CONSERVANCY Arunduchakomuhomure**  
**EM.**

The above subject bears reference,

We, the undersigned, as the community representatives of Okomenyeimue Village in Ombombo-masitu Conservancy hereby certify that we fully understand the above-mentioned project and its benefit to our community. The proposed activity does not interfere with our traditional norms or culture. We wholeheartedly welcome the intent to drill a borehole for our community and encourage adequate consultation during the implementation of the proposed project activities.

This letter serves as the **Free Prior Informed Consent (FPIC)** for the proposed project and intention to drill a borehole.

For the Traditional Authority (TA)

For the Conservancy

Signature: [Signature]

Signature: [Signature]

Name: Womipi Mathews Rahozi

Name: Erwin-Muharukwa

Title: Council

Title: chair man

Date: 26/11/2024

Date: 26/11/2024

Stamp

Stamp

APPENDIX (2):

Attendance Register – Public Consultation Meeting

ATTENDANCE REGISTER

FREE PRIOR INFORMED CONSENT FOR THE PROPOSED (FPIC)

DATE: 05/12/2024 VILLAGE: Ovinyange CONSERVANCY: Ambombo masibu

| Full Name               | Organization / Representation | Gender<br>M/F | Telephone Number | Signature   |
|-------------------------|-------------------------------|---------------|------------------|-------------|
| 1. Ualpahema Mubanku    | N/A                           | M             | 0816612861       | [Signature] |
| 2. Ngazivene Rukwa      |                               | M             | 0815650207       | [Signature] |
| 3. Mbenumba Mubanku     |                               | M             | 0814407284       | [Signature] |
| 4. Mulandangesa Mbazulu |                               | M             | N/A              | [Signature] |
| 5. Jimbule Mbimbo       |                               | M             | 0813590931       | [Signature] |
| 6. Randandeli Rukwa     |                               | M             | 0817113010       | [Signature] |
| 7. Kasamari Jovora      |                               | M             | 0813085759       | [Signature] |
| 8. Uaganka Rutindo      |                               | M             | 08131587094      | [Signature] |
| 9. Jumba Jigema         |                               | M             | —                | Jumba       |

| Full Name               | Organization / Representation | Gender<br>M/F | Telephone Number | Signature   |
|-------------------------|-------------------------------|---------------|------------------|-------------|
| 10. Rentambo Musava     | N/A                           | m             | 0818213666       | [Signature] |
| 11. Uongore Musava      |                               | m             | 0813114663       | [Signature] |
| 12. Fide Teresi Jimanja |                               | F             | 0818642272       | Jimanja     |
| 13. Teacher U Herunga   |                               | m             | N/A              | [Signature] |
| 14. Rutumbwa Jisero     |                               | m             | N/A              | [Signature] |
| 15. Muryanda Hepite     |                               | m             | N/A              | Hepite      |
| 16. Tomas Muegika       |                               | m             | N/A              | Muegika     |
| 17. Muegika Jisunga     |                               | m             | 0817286335       | Jisunga     |
| 18. M. Hwana            |                               | m             | 081254656        | [Signature] |
| 19. Linda Neumbo        |                               | m             | —                | [Signature] |
| 20. Kauri Korongongo    |                               | m             | 0813500603       | Korongongo  |
| 21.                     |                               |               |                  |             |

|     | Full Name          | Organization / Representation | Gender<br>M/F | Telephone Number | Signature   |
|-----|--------------------|-------------------------------|---------------|------------------|-------------|
| 22. | Mbarikwaji Ruvindu | N/A                           | M             | 0812799298       | [Signature] |
| 23. | Satopa Kanyale     | N/A                           | m             | 0816979353       | [Signature] |
| 24. | Mbunguwa Kevanaga  | N/A                           |               | 0818644126       | [Signature] |
| 25. |                    |                               |               |                  |             |

**APPENDIX (1):**

Environmental Management Plan