



ENVIRONMENTAL & SOCIAL MANAGEMENT PLAN:

**FOR THE ALIGNMENT AND CONSTRUCTION OF PUBLIC ROADS AND THE
CONSTRUCTION OF INFRASTRUCTURE AS A RESULT OF TOWNSHIP
ESTABLISHMENT WITHIN EENHANA**

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EXECUTIVE SUMMARY

This Environmental & Social Management Plan (ESMP) has been prepared for the Ekolola Proper township establishment, located on Portion 37 of the Remainder of Farm Eenhana Town and Townlands No. 859, within Eenhana, Ohangwena Region, Namibia. The project is initiated by the Eenhana Town Council, in partnership with Development Workshop Namibia (DWN), and will provide 165 erven zoned residential, business, institutional, and public open space.

The ESMP forms part of the application for an Environmental Clearance Certificate (ECC) in compliance with the Environmental Management Act, 2007 (Act No. 7 of 2007) and its regulations. The project involves the phased construction of bulk infrastructure, including roads, water supply, sewer reticulation and electricity distribution.

The project is expected to contribute positively to the socio-economic development of Eenhana through:

- Addressing housing needs;
- Stimulating local economic development;
- Improving access to sanitation and roads.

Potential environmental and social impacts have been identified, and mitigation measures are outlined in this ESMP, including:

- Dust, noise, and traffic disturbances;
- Temporary pressure on access roads;
- Safety risks for workers and nearby residents;
- Risks of unmanaged construction waste and erosion.

The ESMP outlines mitigation strategies, monitoring procedures, and defines the responsibilities of key role players, including the Contractor, Environmental Control Officer (ECO), and the Employer's Representative (ER). It also incorporates training, public engagement, and reporting procedures to ensure compliance and sustainability during both the construction and operational phases.

This ESMP is a living document and will be reviewed and updated as the project progresses to reflect changes in scope, site conditions, legislation, or stakeholder input. All amendments must be approved by the Eenhana Town Council and, where applicable, the Ministry of Environment, Forestry and Tourism (MEFT) before implementation.

Acronym	Full Term
AoI	Area of Influence
BMZ	German Federal Ministry for Economic Cooperation and Development
DWN	Development Workshop Namibia
ECC	Environmental Clearance Certificate
ECO	Environmental Control Officer
EHS	Environmental, Health and Safety
EHS Guidelines	Environmental, Health and Safety Guidelines (World Bank Group)
EIA	Environmental Impact Assessment
EIA Regulations	Environmental Impact Assessment Regulations (GN 57 of 2007)
ESF	Environmental and Social Framework (World Bank)
ESHS	Environmental, Social, Health and Safety
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standards (World Bank)
ER	Employer's Representative
GN	Government Notice
H&S	Health and Safety
IAP	Interested and Affected Party
ILO	International Labour Organization
KP	Knight Piésold Consulting (Pty) Ltd
KfW	Kreditanstalt für Wiederaufbau (German Development Bank)
MEFT	Ministry of Environment, Forestry and Tourism
MURD	Ministry of Urban and Rural Development
PPE	Personal Protective Equipment
UDA	Urban Dynamics Africa

TABLE OF CONTENTS

1	INTRODUCTION	1
1.1	BACKGROUND TO THE PROJECT	1
1.2	PURPOSE AND OBJECTIVES OF THE ENVIRONMENTAL MANAGEMENT PLAN	1
2	PROJECT DESCRIPTION	2
2.1	Project Overview	2
2.2	Description of the Project Site	2
2.2.1	Location and Extent	2
2.2.2	Land Ownership and Current Land Use	5
2.2.3	Environmental Context	5
2.2.4	Social Context and Previous Land Use	6
2.2.5	Adjacent Land Uses and Area of Influence	6
2.3	Project Activities	7
2.3.1	Client Intent	7
2.3.2	Nature of the Development	7
2.3.3	Planned Construction Activities	8
2.3.4	Project Phasing and Scale	8
2.4	DEVELOPMENT STAKEHOLDERS	9
3	ROLES AND RESPONSIBILITIES	12
3.1	DEVELOPMENT WORKSHOP NAMIBIA (DWN)	12
3.2	CONTRACTORS	12
3.3	OTHER ENTITIES	12
3.4	TRAINING	13
4	PROJECT STANDARDS AND LEGAL FRAMEWORK	13
4.1	NATIONAL AND LOCAL LEGISLATION & PERMIT REQUIREMENTS	13
4.2	INTERNATIONAL LENDER STANDARDS	16
4.2.1	KfW's Sustainability Guideline	16
4.2.2	World Bank Environmental and Social Framework (ESF)	16

4.2.3	Bank Environmental and Social Standards (ESS).....	16
4.2.4	World Bank Environmental and Social Standards (2018)	17
5	STAKEHOLDER ENGAGEMENT AND GRIEVANCE MECHANISM	17
6	REGISTER OF ENVIRONMENTAL AND SOCIAL ASPECTS (E&S ASPECTS).....	18
6.1	PLANNING AND DESIGN PHASE IMPACTS	19
6.2	PROJECT IMPLEMENTATION IMPACTS.....	19
7	ESMP MONITORING.....	20
7.1	A. GENERAL REQUIREMENTS FOR ESHS MANAGEMENT.....	21
7.2	B. PROTECTION OF THE ENVIRONMENT:	23
7.3	C. HEALTH AND SAFETY	28
7.4	D. LABOUR AND RELATIONS WITH LOCAL COMMUNITIES.....	31
8	CONCLUSION:	34

FIGURES

FIGURE 1: PORTION 37, LOCALITY MAP	3
FIGURE 2: EKOLOLA PROPER LAYOUT	4

LIST OF TABLES

TABLE 1: MAIN STAKEHOLDERS' INVOLVEMENT TIMELINE	9
TABLE 2: DEVELOPMENT STAKEHOLDERS	10
TABLE 3: NATIONAL AND ENVIRONMENTAL LEGISLATION	14
TABLE 4: INFRASTRUCTURE AND HAZARDOUS SUBSTANCES	14
TABLE 5: HEALTH, SAFETY, AND SOCIAL LEGISLATION	15
TABLE 6: OTHER RELEVANT FRAMEWORKS	15

ANNEXURES

- Annexure 1: Code of Conduct
- Annexure 2: Grievance Mechanism
- Annexure 3: Health and Safety Plan
- Annexure 4: Incident Reporting
- Annexure 5: Draft Inspection Monitoring Table
- Annexure 6: Locality Plan

1 INTRODUCTION

1.1 BACKGROUND TO THE PROJECT

The Eenhana Town Council, in collaboration with Development Workshop Namibia (DWN), is implementing the Eenhana Portion 37 Township Establishment Project, located on the Remainder of Farm Eenhana Town and Townlands No. 859 within Eenhana, Ohangwena Region. The project forms part of the Council's broader strategy to provide serviced land for residential, business, and institutional development, support structured urban expansion, and improve access to basic town council services within Eenhana.

The project involves the construction of bulk and internal town council infrastructure, including roads, water supply systems, sewer reticulation, electricity distribution networks, and associated road and service infrastructure. Construction activities fall under DWN's Component 1: Land Delivery, with [insert name of construction company] appointed as the main contractor. Knight Piésold Consulting (Pty) Ltd has been appointed by DWN as the Implementation Consultant, responsible for supervising works and ensuring compliance with approved engineering designs, technical standards, and contractual requirements.

DWN has appointed Urban Dynamics Africa (UDA) as the environmental assessment practitioner to prepare this Environmental and Social Management Plan (ESMP) and support the Environmental Clearance Certificate (ECC) application process. The ESMP has been prepared in accordance with the Environmental Management Act, 2007 (Act No. 7 of 2007), its associated regulations, and recognised international best practice, and provides the framework for managing environmental and social aspects throughout the construction lifecycle.

1.2 PURPOSE AND OBJECTIVES OF THE ENVIRONMENTAL MANAGEMENT PLAN

The Environmental & Social Management Plan (ESMP) sets out the approach for managing and mitigating environmental and social (E&S) impacts associated with the construction phase of the Eenhana Ekolola Proper Township Establishment project. Its primary objectives are to:

- Ensure that potential E&S risks identified during the scoping assessment are effectively mitigated and managed.
- Promote compliance with Namibian legislation, local regulatory frameworks, and relevant international standards.
- Define clear responsibilities among DWN, the Contractor, the Implementation Consultant, and Eenhana Town Council.
- Establish procedures for environmental and social monitoring, reporting, and stakeholder communication throughout the project lifecycle.

The ESMP applies to all land servicing and infrastructure construction activities under the project, recognising that implementation will occur incrementally in line with available funding and demand.

2 PROJECT DESCRIPTION

This section provides an overview of the Ekolola Proper Township Establishment Project, including the project location, site context, and the nature of the proposed development. The information presented in this section is based on the Environmental Scoping Assessment and the DWN Site Assessment undertaken for the project.

The project involves the establishment of a formal township and the phased construction of bulk municipal infrastructure within the town of Eenhana, Ohangwena Region. The section sets the context for the environmental and social management measures described in subsequent sections of this ESMP.

2.1 PROJECT OVERVIEW

The Ekolola Proper Township Establishment Project is located within the town of Eenhana in the Ohangwena Region and forms part of the Eenhana Town Council's programme to provide serviced land and support orderly urban expansion.

The project involves the establishment of a formal township and the phased construction of bulk municipal infrastructure to service approximately 165 erven zoned for residential, business, institutional, and public open space uses. The project is implemented by the Eenhana Town Council in partnership with DWN under DWN's Component 1: Land Delivery Programme.

The project is limited to the provision of bulk services and public infrastructure and does not include the construction of buildings.

2.2 DESCRIPTION OF THE PROJECT SITE

2.2.1 Location and Extent

The project site is located within Eenhana, Ohangwena Region, on Portion 37 of the Remainder of Farm Eenhana Town and Townlands No. 859. The site falls within the administrative jurisdiction of the Eenhana Town Council.

The project area covers approximately 13 hectares and will accommodate the establishment of approximately 165 serviced erven. The approximate central coordinates of the site are 17.4622296° South and 16.3214420° East.

A locality plan indicating the position of the project site within the Enhana townlands is shown in **Error! Reference source not found.**. The township layout, showing the proposed erven, road network, service corridors, and public open spaces, is included as



Figure 1: Portion 37, Locality Map

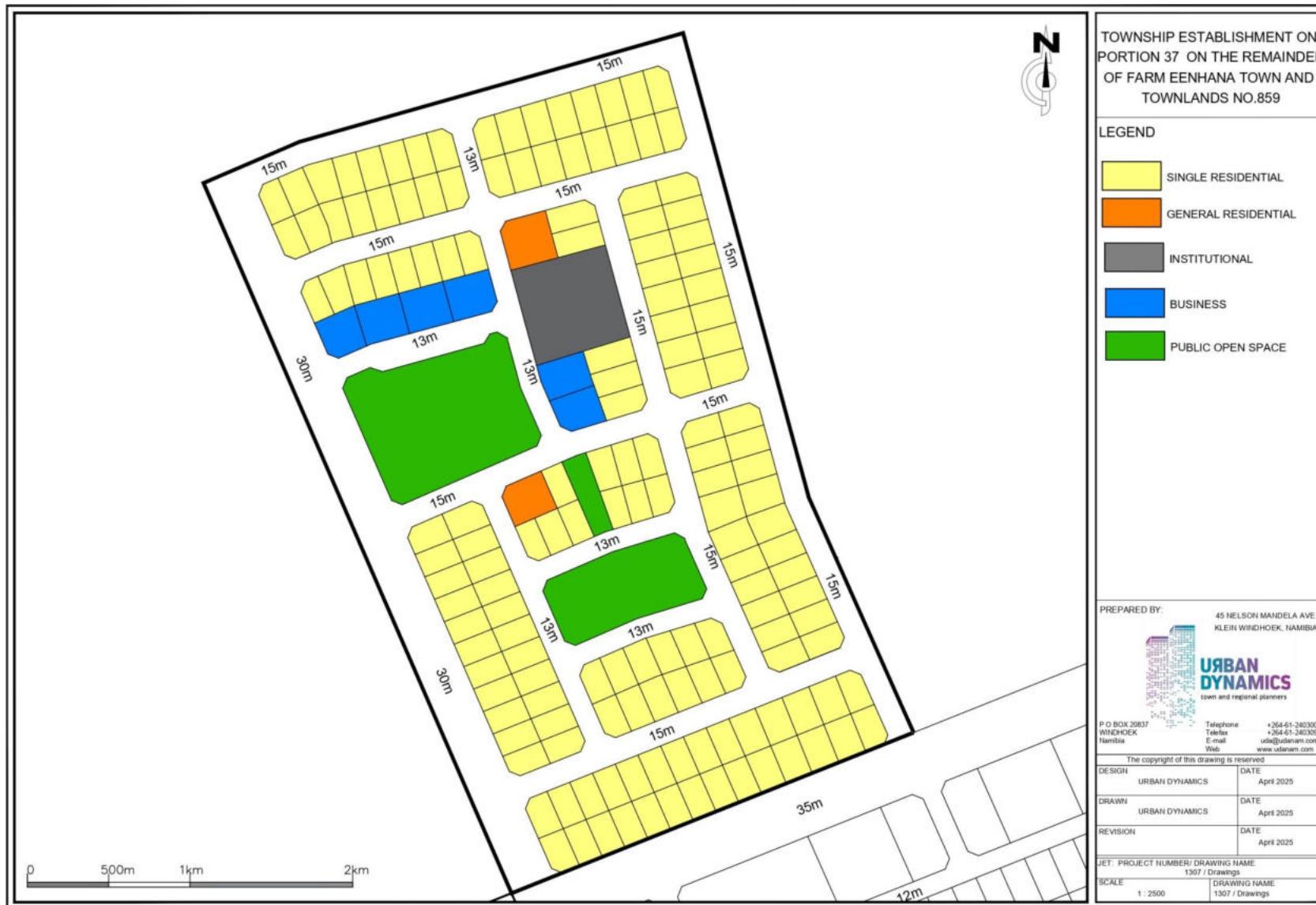


Figure 2: Ekolola Proper Layout

2.2.2 Land Ownership and Current Land Use

Eenhana Town Council is the registered owner of Portion 37 of the Remainder of Farm Eenhana Town and Townlands No. 859.

The site is largely undeveloped and is characterised by open land with informal access tracks, limited grazing activities, and minor wood collection. No permanent formal structures were recorded within the project footprint at the time of the site assessment.

The land is currently zoned as "Undetermined" and is earmarked for township establishment in accordance with the approved township layout and applicable statutory planning processes. The project does not require physical displacement or resettlement of households.

2.2.3 Environmental Context

- Topography and Site Conditions**

The project area is generally flat to gently sloping, with no prominent landforms or defined drainage features. Rainfall typically infiltrates into the sandy soils or evaporates naturally. There is no evidence of a near-surface aquifer or shallow water table, and the area is not prone to flooding. No watercourses, wetlands, oshanas, or floodplains occur within or adjacent to the project site.

- Soils**

Soils within the project area are predominantly sandy, typical of the Ohangwena Region. These soils are susceptible to dust generation when disturbed during construction activities. Appropriate dust suppression, soil protection, and site management measures are therefore required during construction and are addressed in this ESMP.

- Vegetation**

Vegetation within the project area consists mainly of scattered shrubs and trees typical of north-central Namibia. While the vegetation is generally not of conservation concern, some individual tree species occurring within the project area may be listed or protected under applicable forestry legislation.

The presence of such trees represents an environmental sensitivity at the project site. Where protected trees occur, permitting requirements may apply prior to any removal or disturbance. A site-specific Tree Management Plan will therefore be prepared and implemented for the project, with mitigation measures addressed in Section 7 of this ESMP.

2.2.4 Social Context and Previous Land Use

The project site forms part of the northern urban fringe of Eenhana and is located within an area characterised by expanding residential development and informal settlements. Surrounding social infrastructure within the broader area includes schools, places of worship, small commercial activities, and municipal services typical of a growing town.

Previous land use within the project site consisted primarily of open land with low-intensity activities such as grazing and wood collection. No permanent residential structures, graves, or heritage resources were identified within the project footprint during the site assessment and scoping processes.

The presence of nearby residential areas and social facilities, including schools, represents a sensitive social context that has been considered during the planning and assessment of the project. The proposed development is expected to contribute positively to the local social environment through the provision of formal erven, improved access to services, and temporary employment opportunities during the construction phase.

2.2.5 Adjacent Land Uses and Area of Influence

Adjacent land uses include:

- Informal residential areas and homesteads;
- Open land used for grazing and subsistence activities;
- Existing municipal roads and service infrastructure;
- Undeveloped land earmarked for future urban expansion.

The Area of Influence (AoI) includes the project site and surrounding areas that may be affected by construction-related impacts such as dust, noise, increased traffic, and temporary access restrictions. The AoI also includes service corridors associated with water supply, sewer reticulation, electricity distribution, and road infrastructure.

2.3 PROJECT ACTIVITIES

The Ekolola Proper Township Establishment Project is a bulk infrastructure development initiative intended to support formal township expansion within Eenhana, Ohangwena Region. The project is implemented by the Eenhana Town Council in partnership with Development Workshop Namibia (DWN) under DWN's Component 1: Land Delivery Programme.

2.3.1 Client Intent

The client intends to:

- Establish a formally planned township on Portion 37 of the Remainder of Farm Eenhana Town and Townlands No. 859;
- Provide serviced erven to address the demand for residential, institutional, and business land within Eenhana;
- Install essential bulk municipal infrastructure, including roads, water supply, sewer reticulation, and electricity distribution, to enable orderly urban expansion;
- Implement the project in a phased manner in accordance with available funding and approved engineering designs;
- Retain ownership of bulk infrastructure, roads, and public open spaces, while erven will be conveyed under freehold tenure through individual title deeds.

The project does not include the construction of buildings and is limited to the provision of bulk services and public infrastructure within the approved township layout (Figure 2).

2.3.2 Nature of the Development

This is a bulk infrastructure and township servicing project intended to unlock serviced land. The infrastructure components include:

- Public road infrastructure (gravel standard, with provision for future upgrading);
- Bulk and internal water supply reticulation connected to the Eenhana Town Council network;
- Sewer reticulation;
- Electricity distribution infrastructure, including underground cables and street lighting.

2.3.3 Planned Construction Activities

Planned construction activities include:

- Site clearance and preparation within approved construction footprints shown on the township layout (Figure 2), including controlled vegetation removal;
- Earthworks such as excavation, levelling, compaction, and backfilling;

Construction of:

- Gravel roads constructed to town service standards;
- Bulk water supply pipelines and associated infrastructure;
- Sewer reticulation networks;
- Electricity distribution infrastructure, including underground cables and street lighting;
- Connection of new roads and services to existing Enhana Town Council infrastructure;
- Installation of construction safety signage, temporary fencing, and traffic management measures where required.

Construction activities will involve the use of heavy machinery such as excavators, graders, tipper trucks, compactors, water trucks, and trenching equipment.

2.3.4 Project Phasing and Scale

Construction will be implemented in phases, depending on funding availability and technical priorities. Initial phases will focus on:

- Primary road networks;
- Bulk water, sewer, and electricity infrastructure across the project site.

Subsequent phases will focus on:

- Completion of access, connector, and internal roads;
- Completion of service reticulation to all planned erven.

The approved township layout prepared by Urban Dynamics Africa (Pty) Ltd (UDA) (Figure 2) forms the basis for zoning, road alignments, service corridors, and public open spaces. Engineering designs prepared by the appointed consulting engineers will guide the implementation of all bulk infrastructure

2.4 DEVELOPMENT STAKEHOLDERS

The Table 1 and Table 2 summarise the main stakeholders involved in the development project in Eenhana, including their roles, engagement activities, and an indicative timeline for involvement.

Table 1: Main Stakeholders' Involvement Timeline

Stakeholder	Pre-Planning Phase	Design & Approval / Pre-Construction Phase	Construction Phase	Handover / Operational Phase
Eenhana Town Council				
Development Workshop Namibia (DWN)				
Funding Partners				
Affected and Interested Parties (Local Communities)				
Urban Dynamics Africa (UDA)	—			—
Knight Piésold (Engineer)	—			
MURD	—			—
MEFT	—			—
Herman Strydom (Land Surveyor)	—			
Conveyancers	—	—	—	
Contractor (to be appointed)	—	—		

Table 2: Development Stakeholders Role

STAKEHOLDER	ROLE / RESPONSIBILITY	ENGAGEMENT OR KEY ACTIONS	INDICATIVE TIMELINE
EENHANA TOWN COUNCIL	Overall authority for township establishment, planning coordination, and approvals.	Planning and arranging development agreement with DWN; Approvals by CEO and Council resolutions; Technical arrangements with service providers and Engineering Department; Review and consent before MURD approval; Ongoing oversight and community liaison.	Planning to project handover.
DEVELOPMENT WORKSHOP NAMIBIA (DWN)	Implementation consultant, technical coordinator, and project facilitator.	Project conceptual planning support and strategy; Technical coordination with UDA, Knight Piésold, and surveyors; Stakeholder engagement and community consultation facilitation; Preparation and implementation of ESMP and ESHS measures; On-site supervision and construction monitoring; Capacity building and training for contractors and local stakeholders.	Entire project lifecycle.
FUNDING & DEVELOPMENT PARTNERS	Provide financial and technical support.	Support for planning, design, and implementation.	All phases.
LOCAL COMMUNITIES AND RESIDENTS	Primary beneficiaries and directly affected stakeholders.	Public consultations, feedback meetings, grievance mechanism participation.	Throughout the project lifecycle.

STAKEHOLDER	ROLE / RESPONSIBILITY	ENGAGEMENT OR KEY ACTIONS	INDICATIVE TIMELINE
URBAN DYNAMICS AFRICA (UDA)	Township layout design, statutory planning application, and consultation.	Prepare and submit layout to Town Council for initial approval; Submit final layout to MURD for statutory approval; Prepare Screening Report and ECC application to MEFT; Facilitate community engagement during planning and approval stages.	Planning phase.
KNIGHT PIÉSOLD (KP) CONSULTING (KP)	Engineering design, monitoring and sign-off on construction activities.	Technical design, construction monitoring, and quality assurance.	Planning to construction phase.
MINISTRY OF URBAN AND RURAL DEVELOPMENT (MURD)	Approves township establishment application.	Review and statutory final approval.	During layout application stage.
MINISTRY OF ENVIRONMENT, FORESTRY AND TOURISM (MEFT)	Approves ECC and ensures environmental compliance.	ECC application review and decision-making.	Pre-construction phase.
STRYDOM & ASSOCIATES (LAND SURVEYOR)	Aerial photography, cadastral surveys, and final layout confirmation.	Provide aerial mapping for planning and design; Conduct cadastral surveys and confirm layout boundaries.	Planning stage.
CONVEYANCERS	Legal registration of townships and erven.	Registration of legal documents and follow-ups.	Post-approval phase.
CONTRACTORS (TBC)	Construction infrastructure implementation.	ESMP compliance, on-site environmental and social management.	Construction phase.

3 ROLES AND RESPONSIBILITIES

This section outlines the roles and responsibilities of key stakeholders involved in implementing and managing the ESMP during the construction phase of the Ekolola Proper Township Establishment project. The ESMP ensures compliance with environmental legislation and best practices while managing project-related environmental impacts. Successful implementation requires coordination between DWN, contractors and other entities.

3.1 DEVELOPMENT WORKSHOP NAMIBIA (DWN)

DWN, as Implementation Consultant, is responsible for overall environmental management during construction, including:

- Ensuring compliance with national environmental legislation and ESMP mitigation measures.
- Ensuring design and planning comply with national and international best practices.
- Monitoring contractor and subcontractor performance.
- Serving as the primary contact for stakeholder consultation and feedback.
- Providing training to construction workers on environmental management and ESMP implementation.

The Programme Manager holds ultimate responsibility for ESMP implementation, while the Health and Safety (E&S) Manager supports contractors and guides ESMP adherence.

3.2 CONTRACTORS

The Contractor must fulfil ESMP commitments and ensure subcontractors do the same. Responsibilities include:

- Conducting monitoring and site audits to verify ESMP implementation, reporting findings to the Project Environmental Advisor (PEA).
- Promptly reporting environmental issues or incidents to DWN.
- Supporting DWN in training construction personnel on environmental management.

3.3 OTHER ENTITIES

Knight Piésold Consulting (Pty) Ltd (KP) will also undertake periodic site inspections during construction to monitor compliance with approved engineering designs and environmental standards. In addition, KP will provide sign-off on critical construction milestones to ensure that works are implemented according to technical and safety requirements.

The Eenhana Town Council will be informed about the ESMP and involved as appropriate. Additional roles for relevant authorities will be defined, as necessary.

3.4 TRAINING

DWN will provide Induction Training for all employees and contractors before construction begins, and for new personnel joining later. Training covers:

- ESMP mitigation measures and on-site responsibilities.
- Environmental sensitivities of the project area.
- Occupational Health and Safety (H&S) rules (e.g., PPE, conduct, first aid).
- The Grievance Mechanism and workers' rights.
- Handling public enquiries and grievances.
- Code of Conduct for interactions with nearby residents and managing unauthorised visitors.
- Procedures for unforeseen incidents or emergencies.
- Roles and responsibilities regarding environmental management.

DWN will keep training records and repeat sessions as needed. DWN and the contractor will prepare a detailed training plan including refresher courses.

4 PROJECT STANDARDS AND LEGAL FRAMEWORK

The development has undergone a scoping assessment to identify potential environmental and social (E&S) risks associated with the construction phase. To ensure responsible and sustainable project delivery, it will comply with a comprehensive set of national, local, and international standards, guidelines, and regulatory requirements, which apply throughout both the construction and operational phases.

Adherence to this framework ensures the project meets Namibia's legal obligations, aligns with recognised international good practice, supports sustainable development objectives and minimises adverse impacts on the environment and local communities.

4.1 NATIONAL AND LOCAL LEGISLATION & PERMIT REQUIREMENTS

The development will comply with all relevant Namibian national legislation and local planning instruments, notably the Eenhana Town Planning Scheme. These frameworks govern a wide range of aspects, including environmental protection, infrastructure development, occupational health and safety, social safeguards, land use planning, and the conservation of heritage resources. **Error! Reference**

source not found. to **Error! Reference source not found.** summarise the key legislative provisions and their implications for the project.

Table 3: National and Environmental Legislation

THEME	LEGISLATION	PROVISION	PROJECT IMPLICATIONS
NATIONAL	Constitution of the Republic of Namibia (Amendment Act 34/1998)	Guarantees property rights (Art. 16(1)) and mandates sustainable ecosystem management (Art. 95(i))	Supports land ownership and mandates environmental sustainability.
ENVIRONMENTAL	Environmental Management Act, 7 of 2007	Requires Environmental Impact Assessments (Sec 27); mandates public participation (Sec 2(b-c))	Obtain Environmental Clearance Certificate (ECC) and hold consultations.
	Environmental Impact Assessment Regulations GN 57/2007	Lists activities requiring environmental clearance including roads and pipelines (Sec 10(1))	ECC and consultation processes are compulsory.
	Environmental Management Act, 7 of 2007	Regulates noise, dust control, and land rehabilitation.	Construction must mitigate noise, dust, and restore land.
	Environmental Impact Assessment Regulations GN 57/2007	Requires ECC for activities including construction affecting watercourses, canals, and wetlands (Sec. 10(1)(a)(b))	Must assess and mitigate impacts on watercourses; obtain ECC before commencement of such activities.
	Water Act, 54 of 1956	Regulates abstraction, diversion, and use of water resources.	Obtain water use permits for abstraction, diversion, or discharge; comply with water protection measures.

Table 4: Infrastructure and Hazardous Substances

THEME	LEGISLATION	PROVISION	PROJECT IMPLICATIONS
INFRASTRUCTURE	EIA Regulations GN 57/2007	Covers pipelines and roads (Sec 10.1(a), 10.1(b))	ECC required for pipeline and road works.
HAZARDOUS SUBSTANCES	EIA Regulations GN 57/2007	Regulates hazardous materials handling and waste permits (Sec 9.1, 9.2)	Ensure safe storage, handling, and disposal of hazardous substances.

Table 5: Health, Safety, and Social Legislation

THEME	LEGISLATION	PROVISION	PROJECT IMPLICATIONS
HEALTH & SAFETY	Labour Act, 11 of 2007	Regulates worker rights and prohibits child/forced labour.	Comply with labour laws; promote fair employment.
	Public and Environmental Health Act, 2015	Covers health standards, waste management, and water quality.	Maintain health and safety compliance.
	Health and Safety Regulations, 2011	Requires workplace safety measures, PPE, and accident prevention.	Implement occupational health and safety measures.

Table 6: Other Relevant Frameworks

THEME	LEGISLATION	PROVISION	PROJECT IMPLICATIONS
FORESTRY	Forestry Act, 12 of 2001; Forest Regulations GN 170/2015	Protects trees; requires permits for removal.	Obtain permits before tree removal; implement safeguards.
SOIL CONSERVATION	Soil Conservation Act, 76 of 1969	Regulates erosion prevention and soil protection.	Apply erosion control measures.
WASTE MANAGEMENT	Waste Management and Pollution Control Act	Regulates disposal of solid and hazardous waste.	Comply with waste disposal and effluent discharge standards.
CHILD LABOUR	Labour Act, 11 of 2007; Child Care and Protection Act, 2015	Prohibits child labour; sets employment age limits.	Enforce zero tolerance on child labour.
WORKER RIGHTS	ILO Conventions (29, 87, 98, 100, 111)	Prohibits forced labour; guarantees union rights and equal pay.	Ensure fair and non-discriminatory working conditions.
ARCHAEOLOGY	National Heritage Act, 27 of 2004; Burial Place Ordinance	Protects heritage sites and graves.	Report findings; follow legal procedures for heritage sites.

4.2 INTERNATIONAL LENDER STANDARDS

The programme is funded by official development assistance from the Government of the Federal Republic of Germany through the Kreditanstalt für Wiederaufbau (KfW) Development Bank. As such, it must comply with international environmental and social standards required by KfW, which align with the World Bank's Environmental and Social Standards (ESS).

4.2.1 KfW's Sustainability Guideline

All financial cooperation measures financed by KfW are subject to assessment and implementation under the KfW Sustainability Guideline (2021), which sets out principles and procedures for evaluating environmental, social, and climate impacts. This guideline requires compliance with:

- Relevant national legislation and legal requirements;
- The ESS of the World Bank Group;
- World Bank's general and sector-specific Environmental, Health and Safety (EHS) Guidelines;
- ILO core labour standards;
- Human Rights Guidelines of the BMZ.

4.2.2 World Bank Environmental and Social Framework (ESF)

The ESF provides a comprehensive framework for managing environmental and social risks, enhancing transparency, accountability, and sustainable development outcomes through stakeholder engagement. While KfW requires only the ESS to be directly applied, the ESF underpins the broader approach to sustainable project delivery.

4.2.3 Bank Environmental and Social Standards (ESS)

The ESS consists of ten standards designed to:

- Support Borrowers in achieving good international practice for environmental and social sustainability;
- Help meet national and international environmental and social obligations;
- Enhance non-discrimination, transparency, participation, and accountability;
- Improve project sustainability through continuous stakeholder engagement.

A review will be conducted for each project intervention to confirm the relevance and applicability of each ESS based on specific site conditions, scope, and locality.

4.2.4 World Bank Environmental and Social Standards (2018)

The World Bank's ESS consists of ten standards as summarised below. Application of the standards intends to: (a) support Borrowers in achieving good international practice relating to environmental and social sustainability; (b) assist Borrowers in fulfilling their national and international environmental and social obligations; (c) enhance non-discrimination, transparency, participation, accountability, and governance; and (d) enhance the sustainable development outcomes of project through ongoing stakeholder engagement.

KfW's Sustainability Guideline (2021) requires the application of the relevant ESS. The likely applicability of each standard to the DWN Programme is indicated. A review must be undertaken for each intervention to confirm (based on scope, locality, and site specifics) the applicability of the ESS.

5 STAKEHOLDER ENGAGEMENT AND GRIEVANCE MECHANISM

DWN, together with UDA and Enhana Town Council, led a comprehensive stakeholder engagement process as part of the Ekolola Proper Township Establishment project.

Engagement activities included:

- Initial scoping discussions with Enhana Town Council departments (Planning, Engineering, CEO's Office) to define development priorities and technical requirements.
- Detailed design consultations with Knight Piésold Consulting (Pty) Ltd on engineering aspects, service infrastructure planning.
- Public consultation meetings facilitated by UDA and DWN before township layout approval and ECC application.
- Ongoing updates to the Ministry of Urban and Rural Development (MURD) on township layout submission and approval process.
- Submission and review processes with the MEFT for ECC approval.
- Regular technical consultations with Strydom & Associates Land Surveyors on cadastral surveys and layout confirmations.
- Coordination with conveyancers for legal registration of erven and township establishment.

A formal Grievance Mechanism has been established to ensure that community members, workers, and other interested parties can raise concerns or submit feedback throughout the project lifecycle. This mechanism includes:

- A designated contact person at DWN for receiving and logging grievances.
- Availability of grievance submission forms at the town council offices and the DWN project office.
- Clear communication to the public on how to submit complaints or suggestions.
- A standard response time of 20 working days to address grievances, with follow-up actions documented and shared with affected parties.
- Regular updates on resolved grievances to maintain transparency and build trust.

Stakeholder engagement and grievance resolution processes will continue throughout construction and into the operational phase, ensuring ongoing community participation and support.

6 REGISTER OF ENVIRONMENTAL AND SOCIAL ASPECTS (E&S ASPECTS)

This section presents the environmental and social aspects identified for the Ekolola Proper Township Establishment, based on the findings of the Environmental Scoping Assessment undertaken for the project.

The aspects identified for the planning, construction, and operational phases correspond with those assessed during the scoping process. The mitigation measures included in this ESMP are intended to manage and reduce potential negative impacts to acceptable levels through the application of appropriate management measures, monitoring, and good construction practice.

The environmental and social aspects and mitigation measures presented in this section have been informed by the findings of the Environmental Scoping Report for the Eenhana Township Establishment Project (UDA, 2026), which provides the baseline information and impact assessment that guided the preparation of this ESMP.

The mitigation measures set out in Sections 7.1 to 7.4 of this ESMP directly address the impacts identified in Section 8 and Table 6 of the Environmental Scoping Report (UDA, 2026).

6.1 PLANNING AND DESIGN PHASE IMPACTS

During the planning and design phase, the following key environmental and social aspects were identified and addressed to avoid or minimise potential impacts:

- **Cadastral and aerial surveys**, conducted by Strydom & Associates Land Surveyors, to optimise the township layout and avoid sensitive natural and community areas.
- **Legal compliance**, ensuring full alignment with national legislation and international lender standards, including the Environmental Management Act of Namibia, KfW Sustainability Guideline, and World Bank Environmental and Social Standards (ESS).
- **Stakeholder feedback integration**, incorporating input from the Eenhana Town Council, local communities, and technical authorities into final designs and service layouts.
- **Consideration of public open spaces and service corridors**, supporting long-term accessibility, service provision, and community development.

6.2 PROJECT IMPLEMENTATION IMPACTS

During the construction and operational phases, the following key environmental and social risks and impacts have been identified. Specific mitigation and management measures have been established to address each aspect effectively and to ensure ongoing compliance with applicable standards:

- **Dust generation**, mitigated through surface wetting, speed control and covering of stockpiles.
- **Noise and vibration**, managed by maintaining equipment, limiting working hours and using appropriate personal protective equipment (PPE).
- **Solid and hazardous waste management**, addressed through proper collection, on-site storage and disposal at approved facilities.
- **Water contamination risks**, reduced by establishing designated refuelling and maintenance areas and implementing strict spill prevention measures.
- **Biodiversity disturbance**, controlled by restricting vegetation clearing to approved areas, enforcing no-go zones and implementing re-vegetation where required.
- **Occupational health and safety**, safeguarded through comprehensive training, strict PPE enforcement and availability of on-site first aid facilities.
- **Community health and safety**, ensured through clear signage, controlled site access, and proactive communication with local stakeholders.

These aspects and their corresponding mitigation measures are detailed further in the Mitigation and Management Tables included in section 7.

Detailed Code of Conduct, Grievance Mechanism, Health and Safety Plan, and Incident Reporting forms are provided in Annexes 2 to 3.

7 ESMP MONITORING

Monitoring is essential to ensure compliance with mitigation measures and continuous improvement. Contractors and DWN will conduct ongoing monitoring and report to the Eenhana Town Council and funding partners

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
7.1 A. GENERAL REQUIREMENTS FOR ESHS MANAGEMENT				
<u>A1. Responsibilities and Liabilities</u>	Ensure that all workers, suppliers and possible subcontractors are familiar and comply with the ESHS requirements and specifications of this ESMP.	Induction training performed and recorded. Contracts with subcontractors and suppliers	Contractor/DWN	Review of training records Review of Contracts to ensure that Project requirements are included
	Adjust this ESMP template to be project specific, define the frequency of the monitoring procedure and share it with DWN and KfW. Identify if further Management Plans are required and prepare these.	Final Project-specific ESMP Requisite Management Plans	Contractor/DWN	Review final ESMP and Management Plans prior to commencement of work 'No objection' from KfW for final ESMP
<u>A2. Resources allocated to ESHS Management</u>	Assign ESHS responsible staff ¹ and define the requirements and responsibilities. Define person(s) responsible for contact with stakeholders (Relations officer or Community Liaison officer)	Document assigned responsibilities. Inform the relevant authorities/stakeholders about the ESHS responsible staff.	Contractor/DWN	Review assignment of ESHS responsibilities. Records of notification to stakeholders

¹ Note: in many legislations an ESHS manager is required on sites employing 50 workers or more

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
7.1 A. GENERAL REQUIREMENTS FOR ESHS MANAGEMENT				
A3. Reporting	Reporting of progress and incidents, accidents, observations, near misses.	Final Project-specific ESMP (note monitoring and reporting requirements) Records of ESHS and incident reporting	Contractor/DWN	Review E&S Monitoring Checklist E&S audits
A4. Code of Conduct	Establish a Code of Conduct taking into consideration legislation, safety rules, substance abuse, environmental sensitivity, communicable diseases, gender issues (sexual harassment), respect for local beliefs and customs, community interactions etc.	Code of Conduct in place and rules shared with personnel (see Annex A)	Contractor/DWN	Review of Code of Conduct induction records Review of reported punishable or misconduct behaviour Review of grievance records
A5. ESHS Training	Provide induction, training, and awareness to the workforce regarding ESHS risks and mitigation measures (including indirect workers) tailored to Project scope.	Training performed and recorded	Contractor/ DWN	Review of ESHS induction and training records

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
7.2 B. PROTECTION OF THE ENVIRONMENT:				
B1. Protection of adjacent areas	Ensure to keep the buffer distances from sensitive urban services and buildings (school, water supply for populations (borehole)); any housing.	Marking the borders of works site boundaries in line with given limits and usage of warning signs	Contractor/DWN	Site inspection prior to commencement of activities.
	Ensure that work site boundaries and limits are in accordance with plans agreed upon in advance. All construction activities should be carried out within boundaries.	Marking the borders of works site boundaries and usage of warning signs	Contractor/DWN	Site inspection prior to commencement of activities.
	Ensure that means of protection are in place to avoid or minimise adverse effects on vegetation, soils, groundwater and surface water, biodiversity, natural drainage and the water quality in areas within the works area. Construction methods to minimise impacts to the extent possible.	No impacts identified in the adjacent environment	Contractor/DWN	Site assessment prior to site selection. Site inspection prior to commencement of activities. Regular monitoring of adjacent natural resources.
	Protect excavation works with cut off ditches to prevent water from entering excavations.	No water entering excavations	Contractor/DWN	Site inspection
	Minimise visual impacts by good house-keeping and erecting screens if required.	Visual inspection and comparison with adjacent undisturbed areas.	Contractor /DWN	Site inspection Review of grievance records
	After construction, form reshaped land so that it is inherently stable, adequately drained and suitable for the desired long-term land use and allows natural regeneration of vegetation.	Visual inspection and comparison with adjacent undisturbed areas.	Contractor /DWN	Site inspection at completion

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
7.2 B. PROTECTION OF THE ENVIRONMENT:				
B2. Selection of borrow areas, backfill material stockpile sites and access road	Select areas to be excavated, backfill material stockpile locations and access roads if applicable to the project.	Designated areas selected	Contractor /DWN	Once during site selection
	Locate stockpile areas in areas where trees can act as buffers to prevent dust pollution	Designated areas selected	Contractor /DWN	Once during site selection
	Deposit any excess material in areas approved by local authorities	Designated areas selected	Contractor /DWN	Once during site selection
	Locate disposal site on low value land.	Designated areas selected	Contractor /DWN	Once during site selection
B3. Pollution prevention	Ensure all works carried out minimise pollution risk (e.g. liquid effluents, air emissions, noise and vibration management, vehicle and equipment maintenance and selection, fuel, oil and chemical storage and handling) including the whole duration of the Project.	Ensure that potential pollutants are not stored and handled within 50 m of sensitive receptors (particularly boreholes).	Contractor /DWN	Regular site inspection Review of grievance records
B4. Effluents	Ensure appropriate containment and storage of construction wastewater, including sanitary water. No untreated effluent is discharged.	No untreated wastewater discharge	Contractor/DWN	Regular site inspection Review of grievance records
B5. Emissions and dust	Best practice to ensure minimisation of dust emissions (e.g. proper stockpiling, watering etc.) during dry and windy conditions and transportation.	Watering conducted, no dust emissions are observed, no workers' grievances	Contractor /DWN	Regular site inspection Review of grievance records

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
7.2 B. PROTECTION OF THE ENVIRONMENT:				
	Ensure speed limits on site and when passing local receptor areas. Sensitise drivers.	Speed signs installed Training performed and recorded Accident/incident reports	Contractor/DWN	Random site inspection Review of grievance records Review of accident/incident records Review of training records
B6. Noise	Avoid operations and vehicle movements at night.	No work conducted between 17:00 pm and 8:00 am	Contractor/ DWN	Random site inspection Review of grievance records Review of accident/incident records Review of training records
	Locate stationary equipment (such as power generators) as far as possible from nearby receptors (e.g. worker resting areas, populated areas and environmentally sensitive areas).	Distances between equipment and receptors are kept	Contractor/ DWN	Review of grievance records Monitor noise levels in case of complaints
B7. Waste Management	Identify waste management facilities and waste management contractors. Ensure disposal through waste contractors licensed for treatment/removal/recycling of each of the waste types.	Waste management through licensed contractors, if feasible Waste management contracts Waste transfer notes	Contractor/ DWN	Inspect waste management facilities Proof of contractors' certifications Review of waste transfer records
	Ensure that all wastes produced are properly collected, segregated, stored, transported and treated	Waste collection areas existent, waste inventories Waste transfer notes	Contractor/ DWN	Regular site inspection Review of waste inventories Review of waste transfer records

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
7.2 B. PROTECTION OF THE ENVIRONMENT:				
	Minimise the waste production to the extent possible.	Records of waste production are kept Waste Management Plan Training performed and recorded	Contractor/ DWN	Monitor (e.g. monthly) the amount of waste produced Review of training records
	Document all waste related operations (type of wastes, quantities produced etc.).	Storage, transport and treatment of waste is documented Waste transfer notes Waste inventories	Contractor/ DWN	Review of waste transfer records Review of waste inventories
	Appropriate and safe storage of fuels, construction materials, wastes and any materials that can cause spills (e.g. batteries from energy generators).	Safe storage of materials Spill response procedure Spill response and remediation equipment in place.	Contractor/ DWN	Regular site inspection
B8. Vegetation clearing	Limit vegetation clearing to areas within the site boundary where it is strictly necessary.	Vegetation clearing minimal Marking the borders of works site boundaries	Contractor/ DWN	Site inspection prior to commencement of activities.

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
7.2 B. PROTECTION OF THE ENVIRONMENT:				
	<p>Ensure that no chemicals/pesticides are used, burning of vegetation is restricted etc.</p> <p>Do not clear vegetation more than two months in advance of operations</p>	<p>No use of fires or chemicals on site</p> <p>Marking the borders of works site boundaries</p> <p>Usage of warning signs</p>	Contractor/ DWN	<p>Site inspection prior to commencement of activities.</p> <p>Site inspection during site clearance</p>
	<p>A tree survey should be conducted to identify protected tree species on the site.</p> <p>Avoid clearing mature trees and endangered species.</p>	<p>No mature trees cleared</p> <p>Option permits to remove protected trees</p>	Contractor/ DWN	<p>Site inspection prior to commencement of activities.</p> <p>Site inspection during site clearance</p>
B9. Site rehabilitation	<p>Ensure revegetation and restoration of cleared areas where possible after construction using native species.</p>	Revegetation completed	Contractor/ DWN	<p>Site inspection at completion</p>
	<p>Ensure that rehabilitated areas don't pose health and safety risks (such as holes, ponds).</p>	Reinstatement completed	Contractor/ DWN	<p>Site inspection at completion</p> <p>Inspection after heavy rainfalls</p>
	<p>Reinstatement of construction working area to the best possible after construction activities are completed.</p>	Reinstatement completed	Contractor/ DWN	<p>Site inspection at completion</p> <p>Inspection after heavy rainfalls</p>
	<p>Rehabilitate borrow areas, backfill material stockpile sites and access roads, where applicable.</p>	Rehabilitation completed	Contractor/ DWN	<p>Site inspection at completion</p>

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
7.3 C. HEALTH AND SAFETY				
C1. Health and Safety Plan	Develop a Health and Safety Plan to provide for a safe and healthy work environment, taking into account the ESHS impacts and risks level of the works.	H&S Plan in place	Contractor/ DWN	Review of H&S Plan
C2. Accident reporting	Ensure all H&S related incidents (e.g. observations, accidents) on site are recorded and followed up properly. (See Annex 4 – Incident Reporting)	Incident recording process in place	Contractor/ DWN	Check incident/accident records
C3. Personal protective equipment	Ensure the provision of Personal Protective Equipment (PPE) for workers (hardhats, masks, safety glasses, safety boots etc).	PPE used by everyone on-site Training performed and recorded	Contractor/Site Manager	Random site inspection Review training records
C4. Emergency scenarios prevention	Ensure immediate cleaning of any spills and remediation of contaminated areas after construction.	Workers trained Emergency Response Team (ERT) is in place	Contractor/ DWN	Random site inspection after spill events One-time inspection after construction Review of training records Review of ERT
	Provide necessary prevention equipment and teams on site in line with applicable regulations to respond to emergency scenarios e.g. fire, explosion, floods, natural hazards etc.	Prevention equipment and team is in place Training performed and recorded	Contractor/ DWN	Regular site inspection Review list of equipment Review of ERT Review of training records

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
7.3 C. HEALTH AND SAFETY				
	Maintain high standard in housekeeping on site. Construction materials and equipment should be stored properly.	Visual verification of good housekeeping on-site	Contractor/ DWN	Random site inspection
C5. First-aid	Ensure minimum first aid provisions on site (suitably stocked first-aid kits; a person, respectively an adequate number of first-aid helpers and ensure that staff and workers are informed about first-aid arrangements)	Suitable first aid kits on site Ensure the presence of first aid helpers in all shifts First aid certificates	Contractor/ DWN	Regular monitoring of first aid kits Review of first aider certificates Review of number of first aiders required by local legislation
C6. Access to health care	Ensure the workforce has access to primary healthcare on site, providing prescriptions.	Healthcare available on site Medical surveillance records	Contractor/ DWN	Random site inspection Review of grievance records Review of medical records (in case not confidential)
	In case more than 35 workers are present on site, ensure that a hospital, medical clinic or a health centre can be reached within a period of 45 minutes.	Medical centres in the proximity of the site.	Contractor/ DWN	Medical centres in the proximity of the site identified once prior the commencement of works
C7. Hygiene, accommodation and food	Ensure provision of Health and Safety (H&S) and hygienic and sanitary facilities at the site, including shaded welfare areas, bathrooms, changing rooms and potable water. Ensure toilets and changing rooms are separated between male and female employees.	Appropriate H&S and sanitary facilities provided at site	Contractor/ DWN	Campsite inspection prior to accommodation of the workers. Regular inspection Review of grievance records

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
7.3 C. HEALTH AND SAFETY				
	Ensure the provision of adequate space, supply of water, adequate sewage and garbage disposal system, appropriate protection against heat, cold, damp, fire and disease-carrying animals, adequate sanitary and washing facilities, adequate lighting, and basic medical services, in accordance with all applicable health and safety regulations and norms.	Appropriate conditions for workers on site	Contractor/ DWN	Campsite inspection prior to accommodation of the workers. Regular inspection Review of grievance records
	Report any occurrence of any communicable diseases amongst the workforce (STD, HIV/AIDS, TB, malaria and Hepatitis B and C). Sensitise workers.	Communicable Diseases Register Training performed and recorded	Contractor/ DWN	Review of diseases register and disease prevention programme if available. Review of training records

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
7.4 D. LABOUR AND RELATIONS WITH LOCAL COMMUNITIES				
D1. Labour conditions	Ensure minimum legal labour standards as per ILO regulations (child/forced labour, sexual assault, no discrimination, equal opportunities, working hours, minimum wages) are met.	Grievance Mechanism Records, Training performed and recorded	Contractor/ DWN	Review of Inspection reports, Review of grievance records Review of training records
	Ensure that all direct and indirect workers have access to and are aware about the Grievance Mechanism where they can raise workplace relevant complaints anonymously. (See Annex 2 – Grievance Mechanism)	Grievance Mechanism in place and grievances recorded Training performed and recorded	Contractor/ DWN	Review of grievance register Review of training records
	Ensure all workers have the same rights and are treated equally.	Non-discrimination policy in place	Contractor/ DWN	Random site inspection Review of grievance register
D2. Local recruitment	Ensure local communities are preferred for the supply of goods and services to the Project and Project personnel, where appropriate.	Local Procurement and Employment Records	Contractor/ DWN	Review procurement and employment rules and records Review of grievance register

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
7.4 D. LABOUR AND RELATIONS WITH LOCAL COMMUNITIES				
D3. Community interaction	<p>Engage/ communicate/inform communities.</p> <p>Ensure consultations with the local authorities and communities regarding the construction.</p> <p>Obtain local knowledge regarding chance finds and land acquisition matters.</p>	<p>Minutes of Meetings</p> <p>Grievance Mechanism</p>	Contractor/ DWN	<p>Review of grievance register</p> <p>Minutes of consultation meetings</p>
	<p>Initiate an efficient Grievance Mechanism to allow potentially affected individuals to raise their concerns</p>	<p>Grievance Mechanism in place (See Annex 2).</p> <p>Grievances recorded</p>	Contractor/ DWN	Review of grievance register
D4. Damage to people and property	<p>Ensure all contractors implement Codes of Conduct concerning employment and workforce behaviour (including but not limited to safety rules, zero tolerance for substance abuse, environmental sensitivity of the area, dangers of sexually transmissible diseases and HIV/AIDS, gender equality and sexual harassment, respect for the beliefs and customs of the populations and community relations in general).</p>	<p>Code of Conduct (See Annex 1).</p> <p>Grievance Mechanism records</p>	Contractor/ DWN	<p>Worker interviews,</p> <p>Review of grievance register</p>

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
7.4 D. LABOUR AND RELATIONS WITH LOCAL COMMUNITIES				
	Ensure that site areas are provided with appropriate security, fencing, signage and lighting. Use hazard notices/signs/barriers to protect children and other vulnerable people from harm and prevent access to non-workers.	H&S planning of construction site done, items installed	Contractor/ DWN	Inspection prior to the activities. Regular site inspection Review of grievance register
D5. Traffic management	Ensure safe driving by Project personnel (e.g. through training or induction).	Driver Training Records as part of Induction training	Contractor/ DWN	Review of training records Review of grievance register
	Target signage and outreach activities to improve public awareness of traffic changes and potential hazards for high-risk sections of public roads, including near the site and lay down areas.	Warning signs Minutes of Meetings	Contractor/ DWN	Inspection if traffic routes, Review of grievance register
D6 Fossils/ Archaeological Chance Finds	Establish specific procedures to manage the protection of archaeological and historical sites, chance finds, and fossils. Ensure all finds of cultural heritage (e.g. graves, old ceramic, old building fragments) are reported immediately to the relevant authority and avoid excavation in the ultimate neighbourhood of a chance find, fence the chance find and await instructions from the competent authority.	Chance Finds Procedure Notification records to relevant authority Training records, Records about chance finds	Contractor/ DWN	Site inspection Review records of chance finds

8 CONCLUSION:

The ESMP for Ekolola Proper Township Establishment project in Enhana serves as a comprehensive framework to ensure that environmental and social risks are effectively managed throughout the project lifecycle.

Through careful planning and design, guided by cadastral surveys and extensive stakeholder input, the project has proactively integrated sustainability considerations from the outset.

During the construction and operational phases, the ESMP provides clear and practical mitigation measures addressing key risks such as dust, noise, waste, biodiversity disturbance and health and safety concerns. These measures are designed to comply with national legislation and international best practice, including the Namibian Environmental Management Act, KfW Sustainability Guideline, and World Bank Environmental and Social Standards (ESS).

Continuous monitoring and transparent stakeholder engagement, supported by an established grievance mechanism, further strengthen the project's commitment to responsible development and community wellbeing.

Overall, the ESMP aims to facilitate the successful implementation of the township project while safeguarding environmental resources and enhancing socio-economic benefits for the Enhana community.