2024

ENVIRONMENTAL MANAGEMENT PLAN FOR THE OPERATION AND MAINTENANCE OF AN EXISTING 66kV OTJIKOTO – TSUMEB 1 & 2 TRANSMISSION LINES INCLUDING TSUMEB SUBSTATION AND OTHER ASSOCIATED INFRASTRUCTURES.

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NamPower

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1 LIST OF TERMS, ACRONYMS AND ABBREVIATIONS

APD	Anti-Perching Devices
BFD	Bird Flight Diverters
EAP	Environmental Assessment Practitioner
ECC	Environmental Clearance Certificate
EIA	Environmental Impact Assessment
EMA	Environmental Management Act no 7 of 2007
EMP	Environmental Management Plan
GIS	Geographical Information System
HIV/AIDS	Human immunodeficiency virus/ acquired immunodeficiency syndrome.
MEFT	Ministry of Environment, Forest, and Tourism
NHC	National Heritage Council
REDs	Regional Electricity Distributors
SAPP	Southern African Power Pool
SHE	Safety, Health, and Environment
SHEW	Safety, Health, Environment and Wellness
KV	Kilovolt

2 INTRODUCTION

NamPower's core business is the generation, transmission, and energy trading, which takes place within the Southern African Power Pool (SAPP), the largest multilateral energy platform on the African continent. NamPower supplies bulk electricity to Regional Electricity Distributors (REDs), Mines, Farms and Local Authorities (where REDs are not operational) throughout Namibia. To conduct its mandate of transmission of electricity, NamPower's has a transmission network across all regions countrywide. The continuous operation of the transmission networks allows NamPower to provide uninterrupted supply of electricity to regions to improve the living conditions of Namibian citizens and to enable economic development.

The 66kV Otjikoto – Tsumeb powerline was constructed in 1972 and is 8.3 km in length. This transmission line runs from Otjikoto Substation to Tsumeb Substation in Oshikoto region. The Tsumeb Substation covers a footprint of about 1 749 m². This powerline has towers made of Kamerad Hare Structures. Figure 1 shows the locality map for the 66kV Otjikoto - Tsumeb transmission line.

Figure 1: Locality map showing the 66kV Otjikoto - Tsumeb transmission line.

2.1 General area description

The 66kV Otjikoto - Tsumeb 1 & 2 lines fall within the vegetation type known as the Mountain Savannah and Karstveld (Cunningham, 2022). The route is heavily vegetated with most of the route beneath the line totally covered in bush and dominated by *Dichrostachys cinerea* (sicklebush) shrubs. *Eriospermum lavranosii*, *Decorsea dinteri* and *Ceropegia mafekingensis*, are the most important species potentially viewed along the route (Cunningham, 2022).

The general 66kV Otjikoto - Tsumeb 66kV transmission line route, have certain anthropomorphic influences such as roads and tracks, railway line, transmission line and associated access route and infrastructures and urban developments, whereas the impact of line inspections and general maintenance activities would be site specific and have a relatively small environmental "footprint".

The route passes through 1 "hotspot" area which is viewed as "medium" sensitivity (Cunningham, 2022). The 66kV Otjikoto - Tsumeb 1 & 2 section is 8.3 km in length of which 31% of the route is viewed as "medium" sensitivity with unique habitats and 69% of the route is viewed as "low" sensitivity (Cunningham, 2022). The "high" sensitivity areas include the Karst ridge inside Tsumeb, farmlands, rocky areas, and ephemeral rivers such as the Omuramba Owambo (Cunningham, 2022). Figure 2 – 6 show the sensitive areas and some of the protected plant species found along and in the vicinity of the line servitude.

Figure 2. Dense stands of *Dichrostachys cinerea* (sicklebush) in the Otjikoto Substation area.

Figure 3. Aloe litoralis (Windhoek Aloe, protected) observed in the area.

Figure 4. *Sclerocarya birrea* (marula, protected) are important fruit trees throughout the area and typically associated with the karst section adjacent Tsumeb town.

Figure 5. *Dodonaea angustifolia* (sand olive) – invasive alien – observed on the outskirts of Tsumeb.

Figure 6. The karst ridge inside Tsumeb is the most important habitat.

3 OBJECTIVES AND SCOPE OF THIS ENVIRONMENTAL MANAGEMENT PLAN (EMP)

The operation of the transmission line and station can have a negative impact on the receiving environment. However, the impacts are limited to the station boundaries and line servitude. It is thus important that good management measures are implemented to ensure that environmental damage is minimized. This Environmental Management Plan (EMP) seeks to manage and keep to a minimum the negative impacts associated with the transmission line and station and at the same time, enhance the positive and beneficial impacts.

The scope of this EMP includes all activities associated with the operation of the transmission line and substation. It is necessary to highlight that the EMP is a living document that should be periodically reviewed and updated. It should also be noted that the EMP should be read in conjunction with laws and regulations outlined in section 5, Table 1 and all other applicable laws.

The aim of this EMP is to detail the management actions required to implement the mitigation measures identified thereby ensuring that any operational phase activities are carried out in a manner that takes cognizance of environmental protection and is in line with National legislation.

This EMP has the following objectives:

- To outline mitigation measures to be implemented during the operation phase, to manage and minimize the extent of environmental impacts.
- Minimize negative impacts and enhance positive impacts associated with the operations.
- To ensure that the operational activities do not result in undue or reasonably avoidable adverse environmental impacts and ensure that any potential environmental benefits are enhanced.
- To identify key personnel who will be responsible for the implementation of the measures, outline functions and responsibilities.
- To propose mechanisms for monitoring compliance and preventing long term or permanent environmental degradation.
- To ensure that the concerns and complaints of Interested and Affected Parties (I&APs) with regards to the operational activities are addressed effectively and timely.

- Ensure compliance to legislative requirements.

4 POLICY AND LEGISLATIVE FRAMEWORK

The key legislative requirements which are applicable to the operational and maintenance activities include but not limited to the ones listed on table 1 below. The outlined legislations must be read in full for clear understanding in addition to the summary provided in the table.

Table 1: The legislative requirements which are applicable to the operational and maintenance activities.

Legislation:	**Section (s) applicable:**	**Implications:**

Environmental Management Act no 7 of 2007	Section 3
	
	Section 27
	
	Section 33 onwards
	
	And all other applicable sections.
		• All activities performed should be in line with the following principles:
		  ○ Interested and affected parties should have an opportunity to participate in decision making
		  ○ Listed activities should be subject to an EIA
		  ○ Polluter should pay for rehabilitation
		  ○ Pollution should be minimized
		• Environmental assessments should be carried out for listed activities. The proposed activity can be classified under the following range of activities:
		  ○ Generation of electricity
		  ○ Transmission of electricity
		• These sections detail the process to be followed to obtain a clearance certificate.
		• All existing listed activities must obtain a clearance certificate within one year of the

		law coming into effect. Therefore, all existing activities which can be considered a listed activity should apply for clearance.
EMA Regulations GN 28-30 (GG 4878) (February 2012)	• Listed activity: • 5.1 • 6 – 9; 13; 15; 21 -24 • Any other applicable sections	• This activity can be considered as electricity generation and transmission. • These sections detail the process to be followed in terms of producing an Environmental Assessment and this process should be adhered to during the generation of information for this document.
No. 156 Labor Act, 1992: Regulations relating to the health and safety of employees at work.	All applicable regulations	All regulations applicable to different activities must be complied with.
Labor Act no 11 of 2007	• Section 3 • Section 4 • Section 9 • Section 39 – 42 • All other applicable sections	• Children under the age of 16 may not be employed • Forced labor may not be used. • Basic conditions of employment as stipulated by the law must be met. • The employer shall ensure the health and safety of all employees and non-employees on site. Employees must fulfil their duties to ensure their own health and safety and that of other employees and people. Employees may leave the workplace if reasonable measures to protect their health are not taken.
Electricity Act no 4 of 2007	• Section 33	• Installations used for the provision of electricity should be operated with due compliance with the requirements of laws relating to health, safety and environmental standards. Therefore – any company involved within the Electricity

		Supply Industry must adhere to the laws covering the previously stated aspects or stand to lose their licenses to operate.
Public and Environmental Health Act no 1 of 2015	• Section 52 • Section 53 • All other sections applicable to different activities.	• A person generating waste must ensure that the waste generated is kept and stored under conditions that cause no harm to human health or damage to the environment. • Waste must only be disposed of at a waste disposal site, including an incinerator approved by the local authority concerned.
Water Resources Management Act no 24 of 2013	• Section 89 • All other sections applicable to different activities.	• The owner or occupier or other person in control of land where an incident that causes or is likely to cause a water resource to be polluted must take all reasonable measures to contain and minimize the effects of the incident; and to clean up polluted areas and remedy the effects of the incident.
Hazardous Substances Ordinance 14 of 1974	• Section 27 • All other sections applicable to different activities.	• To provide for the control of substances which may cause injury or ill-health to or death of human beings, by reason of their toxic, corrosive, irritant, strongly sensitizing or flammable nature or the generation of pressure thereby in certain circumstances. • To provide for the division of such substances into groups in relation to the degree of danger. • To provide for the prohibition and control of importation, manufacture, sale, use, operation, application, modification, disposal or dumping of such substances; and • To provide for matters connected therewith.
Fertilizers, farm feeds, agricultural remedies and	• Definitions	• Arborocides application is defined as an agricultural remedy under this Act

stock remedies Act no 36 of 1947	• Section 7
	• Section 10
	• All other sections applicable to different activities.
		• Only registered pesticides may be used.
		• May only buy herbicides in a container that complies with the prescribed requirements and is sealed and labelled.
		• Only allowed to use herbicides in the prescribed manner.
		• Landowners must be notified about applications, and the following information must be supplied:
		  ○ Purpose of administration
		  ○ Registered name and number of the product
		• Precautions to be taken before, during and after each administration.

The Nature Conservation Ordinance (1975) as amended through the Nature Conservation Amendment Act of 1996.	• Chapter 11: Game Parks, Nature Reserves, Conservancies and Wildlife Councils	• Permits are required to enter the National Park. Permits are also required for the removal of any protected plant or tree. It also stipulates that no damage may be done to any object of geological, ethnological, archaeological, historical or other scientific interest without the appropriate permits**.**
National Heritage Act No 27 of 2004	• Section: 46, 48, 55 • All other sections applicable to different activities.	• All heritage resources are to be identified and either protected or removed/mitigated with a permit from the National Monuments Council, before any development may take place • A chance find procedure should be followed in case of discovery of a heritage resource.
Soil Conservation Act no 76 of 1969	• Section 4 • Section 13	• The relevant Minister may order institutions to construct soil conservation works when and where necessary.

	• Section 21 • And other applicable sections	• Fire protection schemes may be implemented to regulate the prohibition of veld burning as well as the prevention, control and extinguishing of veld and forest fires. • It is illegal to damage, destroy / fail to maintain any soil conservation works; fire belts; works constructed in terms of a fire protection scheme.
Forest Act no 12 of 2001	• Section 66 • Section 41 • And other applicable sections	• Vegetation may not be removed within 100 m of a river, stream or water course • A person shall be liable for damage caused by any fire which arises as a result of activities carried out on site without having taken reasonable measures to prevent a fire.

5 ROLES AND RESPONSIBILITIES

It is the responsibility of NamPower and/or contractor to ensure that all the environmental management actions are carried out effectively and timeously. It is important to note that the successful implementation of the EMP is, however, dependent on clearly defined roles and responsibilities by several stakeholders. Below are the key employees that are responsible for the management of environmental and social issues during the operational phase:

Table 2: The roles and responsibilities for operational and maintenance activities:

Responsible person	Responsibilities
The Area Superintendent	• Is responsible for the enforcement of the EMP • To ensure that environmental requirements are adequately covered in any external service provider contracts. • To ensure that SHE requirements are included in the tender documents sent to the contractors. A copy of this EMP should also form part of the tender documents. • To ensure that corrective actions are implemented for non-compliances.

	• To ensure that appropriate records and information regarding compliance with environmental requirements are maintained. • To ensure that the line and substation remain in compliance with the requirements of this EMP, through regular communication and monitoring. • To ensure that all incidents, accidents and complaints are reported. To also ensure that incidents, accidents and incidents are investigated to prevent re-occurrence.
Project Manager	• Is responsible for the enforcement of the EMP. • To ensure that SHE requirements are included in the tender documents sent to the contractors. • Must ensure that the contractor remains in compliance with the requirements of this EMP. • To ensure that all incidents, accidents and complaints are reported. To also ensure that incidents, accidents and incidents are investigated to prevent re-occurrence.
NamPower SHEW	• To ensure that all requirements with regards to this EMP are fulfilled. • Communicate NamPower SHEW requirement to the contractors and NamPower employees. • Provides SHEW inductions to NamPower and contractor employees. • Implement monitoring, conduct inspections and audits in consultation with the Project Manager/Area Superintendent. • Document and communicate monitoring, audit and inspection findings to project manager and area superintendent. • Communicate the final inspection report to the Project

	manager on contractor compliance to the EMP before the project close-off and final payment is made to the contractor.
Contractor	• Is responsible for the implementation of the EMP • To appoint Environmental officer responsible for the implementation of this EMP. • To ensure that all tasks undertaken under the scope of work, are in accordance both with NamPower's SHEW requirements, NamPower Contractor Management Procedure, this EMP, as well as the legal requirements. • Ensure that employees are trained and awareness built relating to environmental and social management. • To ensure that all incidents, accidents and complaints are reported to the project manager. The contractor to ensure that incidents, accidents and complaints are investigated to prevent re-occurrence. • Ensuring that all employees receive a SHEW induction before the start of the project. • Ensuring that the work being done does not create a nuisance to any anyone working, residing or living on adjacent properties or within the immediate surroundings of the site.

6 DESCRIPTION OF OPERATIONAL ACTIVITIES TO BE UNDERTAKEN AND ASSOCIATED IMPACTS

The operational activities for the line include but not limited to the ones listed in Table 3. Their associated socio-economic and environmental impacts as also listed.

Table 3: Description of the activities related to the operational activities.

Activity	Description	Associated potential impacts
General	• Physical presence and	• Animal (including birds) mortalities

functioning of the station and transmission line.	functional characteristics of the station and associated line.	through collisions and electrocution. • Mortality of avifauna, especially protected spp. • Visual impact. • Community impacts in a form fatalities or injuries caused by electrocution. • Meeting electricity demand (positive impact).
Maintenance of the station and line	• The maintenance of the station and line entails: • General equipment repairs. • Replacement and servicing station/line components (and oil) • Maintenance of electrical equipment such as transformers, relays and capacitors. • Maintenance of electrical equipment such as transformers, relays and capacitors. • Construction or repairing of access roads.	• Soil and water contamination • Waste generation leading to filling up of landfill space • Destruction of vegetation; vertebrate fauna; avifauna especially protected spp. and sensitive habitats. • Social issues related to the introduction of new workers in the area, e.g. HIV/AIDS spreading. • Loss of human life (through electrocution). .
Construction	Construction include but not limited to the following activities: • Construction or refurbishment of	• Noise emissions • Air emissions • Introduction of new people in the area leading to the spread of diseases such

	buildings (digging and setting of foundations, digging of cable trenches and other activities). • Installation or extension of boundary fences • Upgrade of electrical equipment (either in size, capacity or technology). • Construction of excess roads	as HIV/AIDS • Soil and water contamination • Waste generation leading to filling up of landfill space • Employment of casual workers • Loss of biodiversity reduces habitat availability and food sources for many animals. • Loss of sensitive plants and habitats. • Loss or damage of heritage resources.
Periodic inspections and monitoring	• Replacement, cleaning and maintenance of station and line components.	• Soil and ground water contamination as a result of oil spills • Soil contamination as a result of improper waste handling and disposal. • Loss of biodiversity if existing access roads are not used.
Use and storage of Hazardous Substances	• Storage of hazardous material.	• Possible oil spills and soil contamination from electrical units such as transformers.
Installation of Optic Fiber networks	• Design, Supply, Delivery, Installation and Commissioning of Optic Fibre networks for communication purposes.	• Loss of biodiversity • Soil contamination as a result of improper waste handling and disposal. • Loss of sensitive plants and habitats.
Vegetation Management	• Removal of trees and bushes to maintain access to the line servitude. Removing	• Destruction of vegetation; vertebrate fauna; avifauna especially protected spp. and sensitive habitats.

	weed from the substation yard.	• Conflict with landowners • Loss of topsoil • Soil and water contamination • Loss or damage of heritage resources. • Soil erosion • Destruction of sensitive habitats

7 MANAGEMENT AND MITIGATION MEASURES

To ensure that the potential impacts are eliminated and/or minimised, it is necessary to ensure that the various activities related to the operation and maintenance of the power lines and station are adequately managed and monitored. Table 4 below outline mitigation measures as well as objectives to be achieved. A responsible person (s) have been assigned to each mitigation measure (s).

Table 4: Proposed mitigation measures

ASPECT	MANAGEMENT AND MITIGATION MEASURES/COMMITMENTS	RESPONSIBLE PERSON
Safety Health and Environmental (SHE) Awareness	• All employees should undergo SHE induction before work commences onsite. • All employees are to be made aware of their individual roles and responsibilities in achieving compliance with the EMP. • All employees must receive environmental awareness training. • SHE toolbox talks to be conducted and records to kept onsite.	• Area superintendent • Project manager • SHEW • Contractor • All employees
Safety Management	• A SHE file must be submitted and reviewed by the SHEW section in case of projects in accordance with NamPower SHE requirements. • NamPower Procedures, policies and legal requirements pertaining to safety must be complied with. • Measures must be identified and implemented to safeguard community safety.	• Area superintendent • Project manager • Contractor
Fire Management	• Eliminate the presence of potential sources of ignition. • Fire extinguishers to be readily available onsite. • Regular servicing of fire extinguishers.	• Area superintendent • Project manager • Contractor

ASPECT	MANAGEMENT AND MITIGATION MEASURES/COMMITMENTS	RESPONSIBLE PERSON
	• Firefighting training to be provided to employees. • Maintain fire breaks.	
Air Quality	• Dust generation from all activities must be minimised. • Excavation, handling and transportation of erodible materials shall be avoided under high wind conditions or when a visible dust plume is present. • Speed limit to be enforced to control dust emissions. • Dust suppression measures shall be implemented when necessary. • Vehicle, machinery and equipment shall be maintained in good working order to minimise exhaust fume emissions. • Vehicle, machinery and equipment must be serviced by competent personnel and records must be kept onsite	• Area superintendent • Project manager • Contractor
Resources Efficiency	• Minimise water wastage and record water usage. • Avoid wasteful use of materials. • Source goods and services locally were possible	• Area superintendent • Project manager • Contractor

ASPECT	MANAGEMENT AND MITIGATION MEASURES/COMMITMENTS	RESPONSIBLE PERSON
Waste Management	• Minimise the generation of waste by applying the waste hierarchy. • Station and line servitude to be kept free of waste. • No burning, burying or dumping of any waste materials shall be permitted onsite. All waste must be disposed at an approved and licensed disposal site. • Labelled waste bins with lids must be provided at substations/campsites (in case of a project) for all waste streams and ensure that waste is disposed at nearest approved waste disposal site. • Ensure that waste segregation is done at source. • Hazardous waste shall be disposed of at a registered hazardous waste disposal site. • Safe disposal certificates for hazardous waste must be kept in the SHE file. • Concrete waste or any other waste must not be dumped on site.	• Area superintendent • Project manager • Contractor
Wastewater management	• Water containing environmental pollutants shall be collected and removed from site. • No wastewater runoff or uncontrolled discharges from the site/working areas shall be permitted.	• Project manager • Contractor • Area superintendent

ASPECT	MANAGEMENT AND MITIGATION MEASURES/COMMITMENTS	RESPONSIBLE PERSON
	• Mobile toilets or septic tanks should be used in remote areas.	
Hazardous Substances	• The use, handling, storage and disposal of the hazardous chemical must be in accordance with the MSDS. • Containers must be clearly marked to indicate contents and quantities. • Hazardous substances storage areas must be bunded. A bund should be able to contain 110% of the volume of the largest container stored within it. • All transformers to be contained in bunded areas. • Diesel and other liquid fuel, oil and hydraulic fluid must be stored in appropriate storage tanks or in bowsers with secondary containment. • Inspect and maintain hazardous storage areas and bund walls to avoid overflows. • Ensure that drip trays are available, to be use in case of leaking equipment/vehicle. • Spill kit and absorbents must be available for spill clean-up. • Hazardous substance storage areas must display safety symbolic signs. • All spills must be reported, cleaned and remediated to in compliance with	• Area superintendent • Project manager • Contractor

ASPECT	MANAGEMENT AND MITIGATION MEASURES/COMMITMENTS	RESPONSIBLE PERSON
	SHEW requirements.	
Social Impact	• NamPower/ Contractor must sign land permission form and agreement with landowners 14 days prior to commencement of work onsite. • Employees should limit their contact with permanent residents of the area. • Employees should be properly educated about the impact of HIV / AIDS. • The use of intoxicating liquor or drugs of any kind by the employees is strictly prohibited. • Ensure that all queries and complaints are documented, investigated and dealt with. • A register shall be kept of all complaints from stakeholders, this should also include the actions taken to rectify the complaints.	• Area Superintendent • Project Manager • All NamPower employees • Contractor
Archaeology	• Should a heritage site or archaeological site be uncovered or discovered during the operation phase, a “change find” procedure in appendix 8 should be applied. • Any chance finds must be reported to NamPower environmental section. • In an event of discovery of human remains or other artefacts the work shall cease. A professional archaeologist is to be consulted and carry out	• Area superintendent • Project Manager • SHEW • Contractor

ASPECT	MANAGEMENT AND MITIGATION MEASURES/COMMITMENTS	RESPONSIBLE PERSON
	investigation. • Any damage which may occur shall be reported immediately and the relevant experts contacted to provide remediation advice	
Fauna and Flora	• Ensure that the site is kept clean and free of rubbish that could potentially attract animals and pests • No harvesting or damaging of plants is allowed. • Poaching or capturing of any animal (wild or domestic) is prohibited. • Bird nests may not be disturbed unless interfering with the normal operation of the line/station. • No domestic animals may be kept onsite as they can introduce diseases or interbreed with the animals occurring naturally in the area. • Vehicles driving along the lines should engage four-wheel drive to prevent spinning and consequent impacts on soil surface. • Do not destroy, damage, collect any protected flora species that may be encountered unless interfering with the normal operation of the line/station. • Minimize disturbances to the sensitive areas.	• Area superintendent • Project Manager • Contractor

ASPECT	MANAGEMENT AND MITIGATION MEASURES/COMMITMENTS	RESPONSIBLE PERSON
	• Only remove/prune flora directly affecting the transmission line. • Identify potential bird collision prone areas (i.e. habitats). • Bird flight diverters (BFD's) must be installed in collision prone areas. • Monitor all bird mortalities encountered under the transmission line. • All wildlife and electrical infrastructure interactions such as (animal/bird deaths) must be reported to the SHEW section.	
Water Resources	• Care must be taken to ensure that pollution of water does not occur. • Naturally occurring water resources may not be used for any personal hygiene. • Water may only be taken from a private or government property based on an agreement between the NamPower, contractor and custodian of the water source.	• Area superintendent • Project Manager • Contractor
Erosion	• Implement and maintain erosion control measures where required along the access route. • Rehabilitate eroded areas	• Area superintendent • Project Manager • Contractor

ASPECT	MANAGEMENT AND MITIGATION MEASURES/COMMITMENTS	RESPONSIBLE PERSON
Campsite Establishment	• Adequate ablution facilities must be provided onsite in relation to the number of employees. • Septic tanks/ or similar polluted water containment methods must be used in remote area. • Ablution facilities must not be located within 100m of any river, stream channel, pan, dam or borehole. • Non-employees are not allowed to reside at the campsite. • Fire extinguishers, first aid kits, assembly point, and emergency numbers must be available onsite. • Waste must be managed in accordance with waste management requirements outlined in this EMP.	• Area superintendent • Project Manager • Contractor
Manual and Mechanical Vegetation Removal	• Obtain a permit from the Ministry of Environment, Forestry and Tourism to remove protected trees as per the Forest Act No. 12 of 2001. • Measures must be put in place to avoid erosion especially at rivers, stream channel crossing, and at places where existing erosion scars and dongas are encountered to avoid any further erosion. • Avoid mechanical bush clearing in sensitive areas. • Measures must be put in place to preserve the topsoil structure	• Area superintendent • Project Manager • SHEW • Contractor

ASPECT	MANAGEMENT AND MITIGATION MEASURES/COMMITMENTS	RESPONSIBLE PERSON
	• The disturbed soil must be levelled. • Do not remove wood cut on site as this would affect the recycling of nutrients locally as well as lead to a potential industry in firewood targeting the better-quality tree species. • Where clearing is done near a river, the contractor/NamPower must ensure that no felled bushes/branches/shrubs are left behind in the riverbed. • No burning of bush cleared materials is allowed onsite. • Manual and mechanical vegetation removal should be done in accordance with NamPower Procedures. • Avoid the cutting down of protected tree species [Forestry Ordinance No. 37 of 1952) not directly affecting the power lines during the line clearing operation.	
Herbicide Use	• Prevent the application of selected herbicide(s) in sensitive areas – e.g. “high and medium” sensitivity areas. Sensitive areas are known/expected to have higher biodiversity (See annexure 1). Sensitive areas are known/expected to have higher biodiversity. • Avoid the spraying of protected tree [Forestry Ordinance No. 37 of 1952) not directly affecting the power lines during the line clearing operation.	• Area superintendent • Project Manager • SHEW • Contractor

ASPECT	MANAGEMENT AND MITIGATION MEASURES/COMMITMENTS	RESPONSIBLE PERSON
	• Eradicate all invasive alien species potentially associated with the line/station. This would indicate overall environmental commitment. • Avoid spraying herbicide during windy days/periods. See the general product requirements for herbicide used. This could affect non-target areas and species. • Only recommended herbicides should be used. • Ensure that the Herbicide application should be done in accordance with manufacturer's instructions. • Implement strict control over the storage, protective measures & application of the selected herbicide(s) throughout. • Always consult and adhere to the MSDS requirements for the herbicide • Herbicide must be handled in accordance with the requirements outlined in the NamPower Procedures.	
Emergency Response	• All possible emergencies must be identified. • Emergency preparedness and response plans for the identified emergencies must be prepared and communicated to all relevant stakeholders. • District personnel or any other person conducting work on the lines must have emergency numbers such as for fire brigades, ambulance services, hospitals, police, snake, and bee catchers. The contact details must be posted at the	• Area superintendent • Project Manager • SHEW • Contractor

ASPECT	MANAGEMENT AND MITIGATION MEASURES/COMMITMENTS	RESPONSIBLE PERSON
	substation.	
Site Rehabilitation (progressive and post rehabilitation)	• Progressive rehabilitation when project work is in progress. Post project rehabilitation must also be done. All materials, equipment and waste must be removed from site upon the completion of the project. • An audit prior to the contractor leaving site must be conducted. • SHEW to sign site close off or take over certificate once remedial corrective actions have been implemented.	• Area superintendent • Project Manager • SHEW • Contractor

8 REPORTING, MONONITORING AND AUDITING

The environmental monitoring, inspections and audits must be conducted in line with supporting procedures and requirements of this plan. Monitoring and inspection\audit reports detailing the monitoring and audit results shall be prepared by the SHEW section and communicated to the Area Manager, Superintendent and Project Manager. Records of monitoring and inspection\auditing report shall be kept and will be made available during inspections and audits.

The following general monitoring indicators and guideline are recommended should herbicides be used to do vegetation management along the line:

Table 5: General monitoring indicators and guideline recommended after herbicide application

Monitor trees adjacent the cleared area after herbicide application	A survey in year 1 (i.e. 6 months after application of herbicide) should be conducted along the affected route to determine the effect of the herbicide on non-target areas – i.e. adjacent vegetation. Focus on protected tree species along the route
Monitor coppicing and regrowth after herbicide application	A survey in year 2 (i.e. 1 year after application of herbicide) should be conducted along the affected route to determine the effect of the herbicide on bush clearing. This would indicate the success of the herbicide used as well as indicate the necessity of follow-up treatment.
Sample any open surface water after herbicide application.	Although it is recommended that herbicides not be used in “high” and “medium” sensitivity areas, monitoring this would be viewed as a good practice. Take water samples from any surface water encountered and have these analysed to determine if herbicide used has entered these sources.

9 ON-COMPLIANCE AND CONFLICT MANAGEMENT PROCEDURES

The Area Superintendent, Project manager and Contractor shall ensure that the employees and external service providers comply with the requirements outlined in this EMP. In the event of non-compliance, the following recommended process shall be followed:

- Non – compliances will be identified during inspections or audits conducted by the SHEW Section and reported to the Area manager, Superintendent or Project Manager for corrective actions.
- Area Superintendent / Project Manager shall notify the responsible stakeholders about the non-compliance.
- Corrective and preventative actions must be implemented on an agreed timeframe.
- Follow – up inspections/audits shall be conducted to assess whether the corrective and preventative actions were implemented effectively.

The contractor shall notify NamPower of the following:

- Conflicts arising with any landowner / representative.
- Any special conditions requested by a landowner / representative.

NamPower has the right to stop all contractor's activities if it is found that a gross violation of the EMP is taking place.

10 RECORD KEEPING

Record keeping is important for the effective functioning and implementation of an EMP. EMP documentation must be kept in both the hard copy and electronic format for safe keeping. These must include but not limited to:

- Copy of the Environmental Clearance Certificate
- A copy of an EMP
- Induction records
- Resource use records i.e. water and fuel consumption
- Audit and Inspection reports

- Other related documents

In case chemical vegetation management is conducted, the following records should be kept:

- Date of application
- Herbicide applied
- Persons responsible for application
- Supervisor
- Type of herbicide used
- Method of application
- Time of application
- Equipment used
- Concentration of herbicide used

11 CONCLUSION

All management measures and legal requirements outlined in this EMP should be implemented to ensure environmental compliance by all parties undertaking the operational activities. This will ensure that potential negative impacts are identified, avoided, or mitigated and positive impacts are enhanced. It is unlikely that the operation and maintenance of the transmission line and station will have significant environmental and social repercussions, and it is therefore recommended that the ECC is issued.

12 REFERENCES

Cunningham, P. (2022) ECOLOGY AND VEGETATION ASSESSMENTS WITHIN VARIOUS NORTHEN NAMPOWER TRANSMISSION LINES – OTJIKOTO – TSUMEB 1 & 2 66kV (Tsumeb area) [Rapid Ecology & Vegetation Assessments]

13 ANNEXURES

Annexure 1: Areas of importance and protected species

Table 1. Areas of importance, with protected species potentially affected, along the Otjikoto – Tsumeb 66kV transmission line.

[Direction: Otjikoto Substation northeast o Tsumeb Substation]

Hotspot areas	Distance (km)	Area	Important species	Common names	Status	Aliens	Other important features	Importance ranking
	0 to 5.6	Otjikoto SS						Low
1	5.6 to 8.2	Tsumeb SS	*Aloe litoralis* *Sclerocarya birrea*	Windhoek Aloe marula	NC, C2, LC F			Medium
	8.2 to 8.4	Tsumeb SS						Low

Distance: Not exact as it was measured using car odometer
Importance ranking: Low; Medium
F: Forest Act No. 12 of 2001
NC: Nature Conservation Ordinance No 4. 1975
C2: CITES Appendix 2 species.
LC: Least Concern (IUCN 2022)

Annexure 2: Herbicide application guideline

Management requirement
Recommended herbicide for the control of woody plants: Access 240 SL or any similar product with picloram or tricoplyr as active ingredients should be used
The recommended herbicide for grass and weed at substations is: A product with active ingredient of Glyphosate.
Recommended Application method: Foliar application – spray or paint-on-stump –is recommended as this is target specific. Access mixed with water and Actipron (wetting agent).
Technique: The herbicide can be applied directly to the plant – stem or leaves – as a spray. Trees and shrubs with a stem diameter <10cm can be sprayed directly, but trees with a stem diameter >10cm should be felled before treatment of the cut surface for best results. Treatment should be done as soon as possible after felling and the entire cut surface and stump should be wetted. Coppice growth can also effectively be controlled.
Use: Active growing season – i.e. September to April (best in early growing season – September to November – before main rains) has best results.
Concentration Foliar application = 350ml/100l water + Actipron Super 500ml/100l spray mix. Cut stump application = 2l/100l water + Actipron Super 2l/100l spray mix.
Application repeatability ▪ Year 1: Apply herbicide (early growing season) ▪ Year 2: Follow-up to target any regrowth and coppicing (early growing season) ▪ Thereafter: As required – i.e. dependent on coppicing potential of various species. This could be determined during routine line inspections.

Annexure 3: Monitoring checklist for bush clearing and herbicide application

Activity: Bush clearing **Site:**	**Compliance**	
	Yes	No
Manual clearing conducted		
Mechanical clearing conducted		
Protected tree species on 12m boundary only trimmed		
Protected tree species not affecting line left *in situ*		
Raptor and vulture nesting sites left undisturbed		
Overall access improved		
Activity: Chemical application		
Active ingredient used = Triclopyr		
Application method used = spray		
Application technique used = spray leaves/cut stumps		
Application season = Sep to April (Sep to Nov = best)		
Application conditions = no wind		
Application procedures = protective equipment used as the MSDS		
Application knowledge = certified users only		
Storage = safe/secure		
Storage = chemical register maintained		
Storage = equipment clean/functional		
Concentration: Foliar application = 350ml/100l water + Actipron Super 500ml/100l spray mix		
Concentration: Cut stump application = 2l/100l water + Actipron Super 2l/100l spray mix		
Repeatability: Year 1		

Repeatability: Year 2		
Repeatability: Year 3		
Sensitive “hotspot” areas avoided		
Water – open surface water encountered		
Water – open surface water samples taken		
Collateral damage observed (i.e. non target areas/species affected)		
Any complaints from landowners		

Annexure 4: Protection of Ecology & Vegetation

Activity: Protection of Ecology & Vegetation	**Compliance**	
	Yes	**No**
Track discipline		
Evidence of new tracks		
Evidence of off-road driving		
Evidence of turnaround violations		
Evidence of oil spills		
Evidence of waste		
Evidence of litter		
Illegal collection/damage of flora		
Evidence of vehicle damage to plants		
Erosion		
Evidence of erosion along route		
Evidence of recovery at rehabilitated sites		
Invasive alien plants		
Evidence of invasive alien plants along route		
Bird mortalities		
Record all dead birds encountered below the line		

Annexure 5: Landowner permission form

Landowner Permission Form

Landowner name:	Contact number:
Representative name:	
Farm/village name:	
Contractor/NP Employee:	
Representative name:	Contact number:

General Notice

This form is to be used prior to a contractor entering a landowner's property to commence any work related to the construction or maintenance of power-line structures and servitudes.

The form must be completed by either the landowner or his / her legal representative onthe property.

Section A: Before activities commence

Activities to be undertaken on the property (completed by the contractor):

Use of water resources		Camping Bush clearing	
Powerline erection Powerline refurbishment Trimming of vegetation Use of other infrastructure(please specify)		Herbicide application	
		Access Road usage	
		Rehabilitation	

Specific conditions to be met on the property (as stipulated by the landowner):

_____

_____

_____

_____

Dates when access is needed:

From: _____ **To:** _____

Signatures (prior to entry)

_____ _____

Landowner/ Representative Contractor/NamPower representative

_____ _____

Date Date

Section B: Upon completion of work and prior to leaving the property

Remarks on compliance or misconduct (upon completion of activities):

Issues still to be resolved upon completion of activities:

Signatures (upon completion)

Landowner/Representative	Contractor/NamPower representative
Date	Date

Annexure 6: pre-application consent form for herbicide application

PRE-APPLICATION CONSENT FORM	
Name of Landowner / Representative:	
Contact Details:	
Name of Farm:	
Name of Contractor/NamPower Employee:	
Name and Details of Contact Person:	
Herbicide to be used:	
Period of Application:	
NamPower District Supervisor:	
Contact Details:	
NamPower site to be Treated:	
Comments from Landowner/Representative:	
Signed:	
Landowner/ Representative:	NamPower Representative:
Date:	Date:

Annexure 7: Post application review form for herbicide/pesticide applications

POST-APPLICATION REVIEW FORM	
Name of Landowner / Representative:	
Contact Details:	
Name of Farm/Village:	
Name of Contractor:	
Name and Details of Contact Person:	
Herbicide to be used:	
Period of Application:	
NamPower District Supervisor:	
Contact Details:	
NamPower site to be treated:	
Outstanding Issues:	
Signed:	
Landowner/ Representative:	NamPower Representative:
Date:	Date:

Annexure 8: Chance find procedure

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

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

Procedure:

Action by person identifying archaeological or heritage material.

a) If operating machinery or equipment stop work

b) Identify the site with flag tape

c) Determine GPS position if possible

d) Report findings to foreman

Action by foreman

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

b) Cease any works in immediate vicinity

Action by superintendent

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

b) Determine and mark exclusion boundary

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

Action by archaeologist

a) Inspect site and confirm addition to project GIS

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

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

In the event of discovering human remains

a) Actions as above

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

c) Advise and consult with NHC and Police

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