



ENVIRONMENTAL MANAGEMENT PLAN FOR KOMBAT MINE WATER SUPPLY SCHEME

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LIST OF ABBREVIATIONS

AIDS	Acquired Immune Deficiency Syndrome
Coc	Code of Conduct
DEA	Directorate of Environmental Affairs
EMA	Environmental Management Act
EMP	Environmental Management Plan
HIV	Human Immunodeficiency Virus
I&AP	Interested and Affected Parties
MEFT	Ministry of Environment, Forestry and Tourism
NEM	NamWater Environmental Manager
MSDS	Material Safety Data Sheet
NWQG	Namibian Water Quality Guidelines
NWQS	Namibian Water Quality Standards
STI's	Sexually Transmitted Infections
WTW	Water Treatment Works

1. PURPOSE OF THE EMP

This Environmental Management Plan (EMP) has been compiled for the management of potential environmental impacts during the operation, and decommissioning phases of the proposed KOMBAT MINE Water Supply Scheme. Best practice is proposed for the generic issues of construction management and supervision as well as the on-going management and operation of the pipeline.

In terms of the Environmental Assessment Policy of 1994 and the Environmental Management (Act No 7 of 2007) (EMA), the activities required for the construction of the proposed project requires authorization from the Directorate of Environmental Affairs at the Ministry of Environmental, Forestry and Tourism (MEFT: DEA).

An Environmental Clearance Certificate (ECC) was originally issued in 2022 and this EMP serves as an application for the renewal of the ECC. The ECC was **renewed 2022-12-12** ECC no. 2200031.

2. INTRODUCTION

Kombat is located in the Otavi Mountainland in the Grootfontein district, Otjozondjupa region, Namibia. It is situated approximately 40 kilometres east from Otavi on the B8 tar road and about 48 km west from Grootfontein. Kombat Mine is located 345 km north northeast of Windhoek, the capital of Namibia (**Figure 1**). The Kombat Scheme entails the abstraction of water from the Kombat Mine for transfer into the Eastern National Water Carrier (ENWC) in order to improve the security of water supply to the Central Area of Namibia.

The communal part of the eastern Otjozondjupa Region and Okakarara, referred to as the Waterberg Water Supply Area (WWSA), was previously supplied from 3 sources, namely 2 boreholes near the Berg Aukas Mine, 5 boreholes in the vicinity of Goblenz as well as the water originating from dewatering of the Kombat Mine. At the time, the pumping installation at Berg Aukas Mine was intended to be used only under drought conditions to augment water supply to the 3-Dam System to the Central Area of Namibia (CAN) of which the City of Windhoek is major consumer.

With the current water supply shortage being experience in the CAN, water from the four Kombat boreholes is being transferred through the ENWC for water augmentation to the CAN. It is against this background that NamWater drilled and equipped four boreholes tapping into the water stored in Kombat Mine as a new water source to the CAN.

An Environmental Clearance Certificate (ECC) was originally issued in 2022 and this EMP serves as an application for the renewal of the ECC. The ECC was **renewed 2022-12-11** ECC no. 2200031

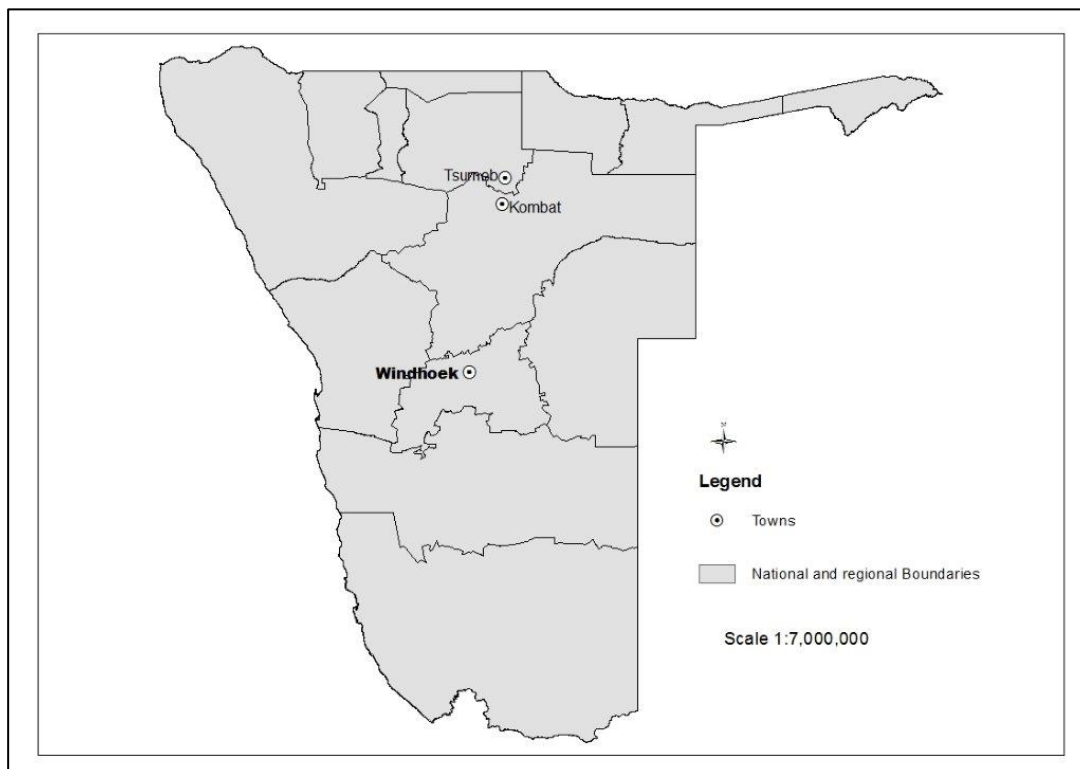


Figure 1: Kombat Location Map

2.1 Background to Kombat Mine

Production at Kombat dates back to the early 1900's when copper ores were first extracted from high-grade underground and near surface deposits. These early discoveries resulted in the modernization of the project in the 1960's with the addition of several shafts, a mill and concentrator. The mine was operated by Tsumeb Corporation Limited from 1962 and since then ownership changed a number of times. In 2008, the mine was flooded, abandoned and has been dormant since. Besides copper, there are sizeable deposits of lead and silver.

The current owner of the mine is Trigon Metals, a Canadian copper exploration and development company. Trigon Metals, through its Namibian subsidiary Manila Investments, holds an 80% interest in five mining licenses in the Otavi Mountainlands, an area of Namibia particularly known for its high-grade copper deposits

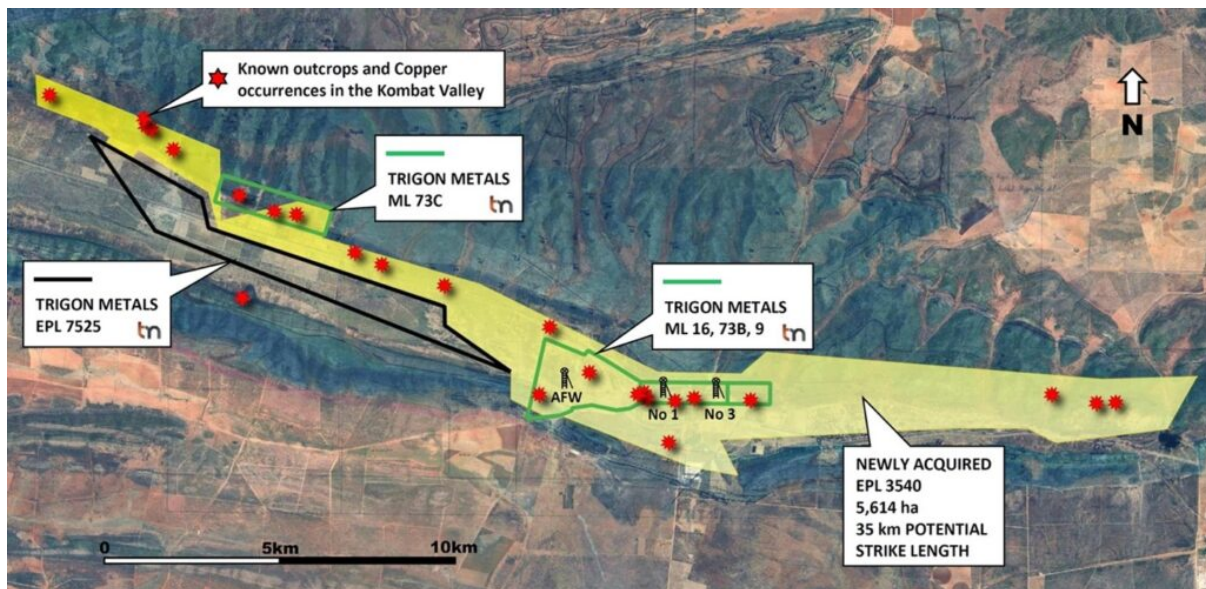


Figure 1: Licences held by Trigon (<https://www.trigonmetals.com/projects-in-africa/kombat-mine-copper-mine-in-namibia/>)

3. EXISTING INFRASTRUCTURE

The existing infrastructure comprises of the following:

- * A 175m³ ground level reservoir;
- * A buried pipeline system of approximately 20.1 km, running from the reservoir to the Eastern National Water Carrier (ENWC) canal. The pipeline is constructed with Asbestos Cement, Class 12(6 bar operating pressure) pipes and consists of three sections of 450mm diameter (7.5km), 500mm diameter (5.2km) and 400mm diameter (7.4km) pipelines;
- * An approximately 2 km long pipeline between the boreholes and the reservoir; and
- * A booster pump station comprising of pump sets, pipework and valves complete with motor control centre (MCC), variable speed drives (VSDs), harmonic filters, air conditioners with other associated electrical accessories, and related instrumentation and communication equipment.

3.1 Maintenance

Remedial maintenance is carried out by the operator and assistants, while the maintenance of the mechanical and electrical equipment, buildings, pipelines and installations is carried out by NamWater Staff from the Otjiwarongo office.

3.3.1 Pumps

All motors bearings should be lubricated with a high-temperature lithium-based grease after 3000 hours.

If a pump/s were out of operation for six months, lubrication is required before service commence on all motor bearings.

3.3.2 Air Valves

Monthly the valves must be opened to be descaled and cleaned to ensure effective operation. The service intervals will depend on the severity of the conditions.

3.3.3 Pressure Gauges and Transducers

Monthly the gauge cocks must be turned to bleed-off air and ensure accurate readings. Turning prevents scale accumulation which prevents the gauge cock from functioning. The operational or service intervals will depend on the severity of the conditions.

3.3.4 Reservoirs

The reservoirs should be checked for leaks and other damages on a monthly basis. If leaks are detected, it should be fixed immediately.

3.3.5 Pipe Breaks/leaks

Monthly monitor of pipes should be done to avoid wastage of water in an event a major pipe break. The pipeline corridor for maintenance work is 10 m by 5 m.

4. BRIEF DESCRIPTION OF THE RECEIVING ENVIRONMENT

The environmental management legislation in Namibia emphasizes on certain aspects of the environment that needs specific attention during project implementation. These aspects, together with the collection of baseline information on the receiving environment, ensure that there is adequate information about the study area to make informed decisions with regard to planning, construction and operation of the proposed reservoir. This in turn warrants that the principles of ecological sustainability, social equity and economic efficiency are employed during the project implementation.

The baseline description provided below focuses on those aspects of the receiving environment that are anticipated to be affected by the project:

4.1 Climate

Average temperatures in the Kombat area are high, with the warmest month in October and the coolest month in July. There is a rainy season from December through March and a dry season from May to September, with December being the wettest month and June the driest (Putich *et al*, 2014).

4.1.1 Rainfall

Kombat is semi-arid to arid, with an average annual rainfall of 524 mm. The rainy season is normally in summer, from December to February. The time between May and July is regarded as winter with no or little rain. Occasional thunderstorms occur during the summer rainfall months, October to March. The average rainfall is 555 mm per annum (Putich *et al.*, 2014).

4.1.2 Temperature

The mean annual temperature for Kombat and surrounds is 25°C and monthly temperature ranges between mean maximum temperature of 26°C and mean minimum temperature of 16°C throughout out the year (Křibek *et al.*, 2005).

4.2 Physical Geography

According to Putich *et al.*, (2014) Kombat lies on the Northern Carbonate Platform of the Damara Orogen. The Platform consists of a thick sequence of Otavi Group carbonates deposited upon Nosib and Basement rocks during the late Proterozoic to early Phanerozoic periods (500-550 Million years ago), classified into Mountain Savanna and Karstveld landscapes (Ministry of Environment and Tourism, 2004). The Karstveld landscape Mendelsohn *et al.*, (2002a) extends as narrow, raised margin that encircles the lower-lying Owambo Basin in the central northern Namibia.

The Karstveld lies on massive deposits of calcrete and dolomite (Mendelsohn *et al.*, 2002b). The rocks are dominated by limestone that dissolves easily in water, forming large underground caverns, lakes (Lake Otjikoto and Lake Guinas) and aquifers of underground water (Mendelsohn *et al.*, 2002a). Lake Otjikoto and Lake Guinas, according to Mendelsohn *et al.*, (2002a), are in fact sinkholes which contain underground water that is now visible because of the collapse of the ceiling of the caverns that used to conceal the water.

4.3 Natural Fauna and Flora

The variety of topography and soils in the landscape surrounding the Kombat area support a diverse assemblage of plants (Mendelsohn *et al.*, 2002a). The area is dominated by woody plants such as *Colophospermum mopane* trees and shrubs, *Acacia* species and *Catophractes alexandri* (Mendelsohn *et al.*, 2002a). The area is characterised by *Kirkia acuminata*, *Gyrocarpus americanus*, *Fockea multiflora*, *Berchemia discolor*, *Pachypodium lealii*, *Croton* spp., and *Moringa ovaliflora*.

Shrubs and small trees of *Combretum apiculatum*, *Dichrostachys cinerea*, as well as species of *Croton* and *Acacia*, according to Giess (1971) cover the flats between mountains and mountain ridges. On sandveld patches *Terminalia sericea*, *Philenoptera nelsii*, and *Acacia* species are common (Giess, 1971). The outcrops of recent surface limestone, has tree stratum which consists mainly of *Ficus cordata*, *F. sycomorus*, *F. petersii*, *Spirostachys Africana*, *Sclerocarya birrea* subsp. *caffra*, *Peltophorum africanum*, and *Combretum imberbe* (Giess, 1971).

The Kombat area and surrounds has a variety of grasses growing in sandy areas such as the coarse and hard grass Blackfoot *Brachiaria* (*Brachiaria nigropedata*), Kalahari Sand Quick (*Schmidtia pappophoroides*) and Wool Grass (*Antheophora pubescens*). According to Geo-Consult (1996) bushes such as Leadwood (*Combretum imberbe*) grow in the mountain regions along with grasses like the Armgras (*Brachiaria eruciformis*).

According to Mendelsohn *et al.*, (2002) a total of 658 species of birds are recorded in Namibia, with 201-230 of these are found in the Kombat area and surrounds. The Kombat surrounds has about over 71 reptile species and 76 mammal species. The area is renowned as a natural

breeding area and habitat of the Eland antelope (*Taurotragus oryx*). Other type of mammalian species found in the Kombat surrounds are: kudu (*Tragelaphus strepsiceros*), duikers (*Sylvicapra grimmia*), springbok (*Antidorcas marsupialis*), steenbok (*Raphicercus campestris*), wild cat (*Felis silvestris*), hyena (*Crocuta crocuta*), and damara dik-dik (*Madoqua kirkii*).

A total of 658 species of birds have been recorded in Namibia and of these, 201-230 bird species are found around Tsumeb (Mendelsohn *et al.*, 2002a). There are over 71 reptile species and 76 mammal species around the Tsumeb area (Mendelsohn *et al.*, 2002a). The following may occur around the Tsumeb area: kudu, steenbok, springbok, damara dik-dik, hyena, wild cat and other small predators (Geo-Consult, 1996).

5. THE LEGAL ENVIRONMENT

A legal review was done, and the key laws of concern include those which protect the ecological integrity of the CNWSA: Kombat Mine ecosystem and its water resource, including the Water Act of 1954 and the Water Resources Management Act of 2004, and applicable international treaties such as the Convention on Biological Diversity. These laws and conventions place Namibia under an obligation to conserve the ecological integrity of the CNWSA: Kombat Mine ecosystem for the sustainable use by Namibians.

5.1 The Constitution of the Republic of Namibia

There are two clauses contained in the Namibian Constitution that are of particular relevance to sound environmental management practice, viz. articles 91(c) and 95(l). In giving effect to articles 91(c) and 95(l) of the Constitution of Namibia, general principles for sound management of the environment and natural resources in an integrated manner have been formulated. The formulation of these general principles resulted in the Namibia's Environmental Assessment Policy of 1994. To give statutory effect to this Policy, the Environmental Management Act was approved in 2007, and gazetted as the Environmental Management Act (Act No. 7 of 2007) (herein referred to as the EMA). As the organ of state responsible for management and protection of its natural resources, MEFT: DEA is committed to pursuing the 13 principles of environmental management that is set out by Part 2 of the Act.

To summarise, Articles 91(c) and 95(l) refer to:

- Guarding against over –utilisation of biological natural resources;
- Limiting over-exploitation of non-renewable resources;
- Ensuring ecosystem functionality
- Protecting Namibia's sense of place and character;
- Maintaining biological diversity and
- Pursuing sustainable natural resource use.

5.2 Environmental Assessment Policy (1995)

Cabinet endorsed Namibia's Environmental Assessment Policy in 1995 as the first formal effort in Namibia to regulate the application of environmental impact assessments and environmental management. Amongst others, the Policy provides a procedure for conducting EIA's which sets out to:

- Better inform decision makers and to promote accountability of decisions taken;
- Strive for a high degree of public participation and involvement of all sectors of the Namibian community during the execution of the EIA;
- Take into account the environmental costs and benefits of projects and programmes;
- Promote sustainable development in Namibia;

- Ensure that anticipated adverse impacts are minimized and that positive impacts are maximized.

5.3 Environmental Management Act (No 7 of 2007) (EMA)

The Environmental Management Act (EMA) was promulgated in 2007 by Parliament and gives effect to the Environmental Assessment Policy. The Act specifies the environmental assessment procedures to be followed as well as the listed activities (activities that require an EIA).

Of relevance to this project are the following listed activities, as provided in Section 27 of this Act, which include:

- Water use and disposal;
- Transportation

5.4 EIA Regulations Government Notice No. 30, promulgated on 6 February 2012

The regulations, promulgated in terms of the EMA, were promulgated on 6 February 2012 and indicated certain activities that require an Environmental Clearance from MEFT: DEA prior to commencing.

5.5 Water Act 54 of 1956 and Water Resources Management Act 11 of 2013

The Water Resources Management Act 11 of 2013 is presently without regulations; therefore the Water Act 54 is still in force. The Act provides for the management and protection of surface and groundwater resources in terms of utilisation and pollution.

6. RESPONSIBLE PARTIES

NamWater's Environmental Manager is primarily responsible for the implementation of the EMP during the operational and maintenance phases.

6.1 NamWater

NamWater, as the implementing agency, is responsible for:

- Ensuring that the objects of the EMP are being obtained;
- Ensuring that all environmental impacts are managed according to the environmental principles of avoiding, minimizing, mitigating and rehabilitation. This will be achieved by successful implementation of the EMP;
- Ensuring that appropriate monitoring and compliance auditing are executed;
- Ensuring that the environment is rehabilitated to its natural state as far as possible.

NamWater shall ensure that all employees attend an Environmental, Awareness Training Course. This course shall be structured to ensure that attendees:

- Become familiar with the environmental controls contained in the EMP;
- Are made aware of the need to conserve water and minimise waste;
- Are made aware of NamWater's Code of Conduct;
- Are aware that a copy of the EMP is readily available at the plant and that all staff are aware of the location and have access to the document;
- Are informed that employee information posters, outlining the environmental "do's" and "don'ts" (as per the environmental awareness training course) will be placed at prominent locations throughout the site.

6.2 Contractor

The Contractor shall conduct his/her activities so as to cause the least possible disturbance to the existing amenities, whether natural or man-made, in accordance with all the current statutory requirements. Special care shall be taken by the Contractor to prevent irreversible damage to the environment. The Contractor shall take adequate steps to educate all members of his workforce as well as his supervisory staff on the relevant environmental laws and protection requirements. The Contractor shall supplement these steps with prominently displayed notices and signs in strategic locations to remind personnel of environmental obligations.

A suitably qualified independent ECO shall be appointed by NamWater/Contractor to undertake the following tasks:

- Liaison with Contractor, Interested and Affected Parties (I&APs) and Engineer regarding environmental matters.
- Monitoring of all of the Contractor's activities for compliance with the various environmental requirements at regular intervals.
- Routine environmental auditing and reporting of the Contractor's performance against the EMP.
- Reporting of environmental incidents and routine reporting of environmental issues associated with construction activities to NamWater, the Contractor and any relevant environmental authority.

- Identifying environmental non-conformances and initiating measures to remedy such issues, including the institution of fines against the Contractor.

The Contractor shall ensure that all employees attend an Environmental Awareness Training Course. This course shall be structured to ensure that attendees:

- Become familiar with the environmental controls contained in the EMP.
- Are made aware of the need to conserve water and minimise waste.
- Are made aware of NamWater's Code of Conduct.
- Are aware that a copy of the EMP is readily available at the plant and that all staff are aware of the location and have access to the document.
- Are informed that employee information posters, outlining the environmental "do's" and "don'ts" (as per the environmental awareness training course) will be placed at prominent locations throughout the site.

The Contractor shall construct and/ or implement all the necessary environmental protection measures in each area before any construction work may proceed. The Engineer/ ECO may suspend the Works at any time should the Contractor, in the Engineer/ Eco's opinion, fail to implement, operate or maintain any of the environmental protection measures adequately. The costs of such suspension shall be to the Contractor's account.

7. ENVIRONMENTAL MANAGEMENT PLAN

An Environmental Management Plans (EMP) is an important tool focusing on the management actions that are required to ensure environmental compliance of a particular project.

EMP implementation is a cyclical process that converts mitigation measures into actions and through cyclical monitoring, auditing, review and corrective action, ensures conformance with stated EMP aims and objectives. Monitoring and auditing, feedback for continual improvement ensures that environmental performance has been provided and corrective action is taken for an effective EMP.

The main aim of this EMP is to ensure that the project complies with the goals of the Namibian Environmental Management Act (No. 7 of 2007); and, more specifically, to provide a framework for implementing the management actions as described in the EMP for the operational and maintenance phases of the scheme. Best practice is proposed for the operation of the scheme.

There are some environmental impacts that cannot be avoided. These environmental impacts require mitigation, and in order to mitigate against these impacts an EMP is required. The EMP aims to ensure best practises are implemented and environmental degradation is avoided through appropriate environmental protection, adherence to legal requirements and maintaining good community relationships.

MEFT indicated that EMP's for existing operations are sufficient.

The project activities are grouped according to the different operational processes and stages. Most of the impacts can be reduced through good housekeeping.

8. MANAGEMENT ACTIONS

8.1 Operation and Maintenance phase of the Kombat Mine Water Supply Scheme

8.1.1 Introduction

The Operational Phase Section relates to the management and mitigation measures required to ensure that the continuation of the bulk water supply network and the maintenance of the infrastructure is operated in a manner that demonstrates responsible, precautionary environmental management.

The EMP will address specific areas of concern in terms of the long-term environmental management of the affected environment and is intended to serve as a guide to the on-going management of the water supply scheme site as well as the affected environment. The EMP will therefore aim to provide NamWater with the necessary tools to ensure that the potential impacts on the natural environment of the site during the operation of the water supply scheme are minimised. Moreover, it will aim to ensure that the infrastructure is operated and maintained according to Best Practice, in an environmentally sensitive and sustainable manner, and that the operation of the infrastructure does not result in reasonably avoidable environmental impacts.

8.1.2 Maintenance Procedures

The optimal operation and effective maintenance of all the scheme components is important in protecting the environment and ensuring that resources are not wasted and environmental incidents arising out of equipment or infrastructure failures, are avoided. Operation and Maintenance Manuals are available for the Kombat Mine Scheme. The manuals provide a detailed guidance on the operation of all machinery and associated systems as well as related maintenance procedures, including maintenance schedules. Implementation of this manuals by NamWater will facilitate the proactive management of potential risks and thus result in impacts on the receiving environment being averted.

The maintenance procedures set out in the manuals, provides specific guidance in terms of the monitoring and maintenance of the scheme components. These procedures will specify the equipment item and specific component of each piece of equipment requiring checking, the scope and nature of the check that is to be carried out including detailed instructions related to the specific check, and the programme for conducting each check.

Table 1: Operation and Maintenance Phase Management Table

Objectives	Potential Impact	Management Action	
a. Minimize the loss of rare/endangered fauna and flora species.	Loss of rare / endangered fauna or flora species.	<ul style="list-style-type: none"> Avoid small mammal / reptile and bird nesting where possible. Do not hurt, kill or unnecessarily disturb birds or animals. 	<p>Ensure scheme operations and maintenance is limited to the area next to the pipeline and reservoir corridors.</p> <p>Visual checks to ensure that no disturbance occur outside the pipeline corridor.</p> <p>Frequency: Monthly.</p> <p>Responsible Person: Scheme Supervisor.</p>
b. Prevent unnecessary removal of trees/plants of importance.	Unnecessary removal of trees/plants of importance.	<ul style="list-style-type: none"> Do not remove any vegetation unless it is absolutely necessary. Make sure that operation and maintenance team is well informed. Do not disturb, deface, destroy or remove plants or natural features, whether fenced or not. 	<p>Visual inspection/checks to prevent, as well as to ensure the unnecessary removal of trees/plants.</p> <p>Frequency: Monthly.</p> <p>Responsible Person: Scheme Supervisor.</p>
c. Minimize the loss of rare/endangered fauna and flora species.	Loss of rare / endangered fauna or flora species.	<ul style="list-style-type: none"> Avoid small mammal / reptile and bird nesting where possible. Do not hurt, kill or unnecessarily disturb birds or animals. 	<p>Ensure scheme operations and maintenance is limited to the area next to the pipeline and reservoir corridors.</p> <p>Visual checks to ensure that no unnecessary disturbance occur outside the pipeline and reservoir corridors.</p>

Objectives	Potential Impact	Management Action	
			Frequency: Monthly. Responsible Person: Scheme Supervisor.
d. Prevent the poaching of flora and fauna.	Poaching of fauna and flora.	<ul style="list-style-type: none"> Employees who poach fauna and/or flora will be handed to the authorities for prosecution. Regular checks of the surrounding environment must be undertaken to ensure no traps or snares have been set. Any snares or traps found on or adjacent to the site must be disposed of. 	Visual inspection. Frequency: Weekly visual checks. Responsible Person: Scheme Supervisor
e. Minimise the creation and use of tracks outside existing roads.	Creation of tracks outside existing roads.	<ul style="list-style-type: none"> Use existing roads. Traffic shall be controlled to ensure minimal disruption to other road users. Do not construct new roads when the quality of existing roads deteriorates. Where possible, repair or upgrade existing roads. Ensure that adequate vehicle turning areas are allowed for. Enforce speed limits at all times. Unless otherwise specified, the speed limit on access roads is 50km/h. Runoff from roads must be managed to avoid erosion and pollution problems. Roads not required for further use shall be rehabilitated immediately. 	Visual checks to ensure that no off-road driving exists. Frequency: Weekly. Responsible Person: Scheme Supervisor.

Objectives	Potential Impact	Management Action	
		<ul style="list-style-type: none"> • Use 3-point turns and not U-turns. Confine turning to the road. • Prevent shortcuts between roads. 	
f. Minimise the damage and destruction of important palaeontological and archaeological sites.	Disturbance to sites of palaeontological and archaeological importance.	<ul style="list-style-type: none"> • Do not disrupt any archaeological or palaeontological sites. Inform NEM (J Kamburona at cell no 081 144 1528) who will take the necessary action. • All workers will be educated about the importance of preserving archaeological sites. • Educate specific workers about tell-tale signs of archaeological sites and the action to be taken if one is identified 	<p>Monitoring can and should involve field induction of key scheme personnel so that they will be able to recognize the important palaeontological and archaeological sites themselves.</p> <p>Frequency: Monthly.</p> <p>Person Responsible: Scheme Supervisor.</p>
g. Minimise the number of heavy vehicles on the road.	Increased number of heavy vehicles on the road.	<ul style="list-style-type: none"> • Heavy vehicles should be limited to numbers necessary. 	<p>Checks to ensure that there is minimal heavy vehicle on the road.</p> <p>Frequency: Weekly.</p> <p>Responsible Person: Scheme Supervisor.</p>
h. Minimise and if possible prevent the activities that accelerate erosion during operation or maintenance.	Erosion.	<ul style="list-style-type: none"> • Runoff on steep inclines should be diverted to prevent the formation of erosion gullies. • Vegetative cover is the most efficient and economical means of controlling soil erosion. 	Visual inspection to ensure that activities that accelerate soil erosion are minimised and if possible prevented at all cost.

Objectives	Potential Impact	Management Action	
		<ul style="list-style-type: none"> Berms should be constructed at selected intervals on long sloping areas to prevent erosion. Diversion berms should be reshaped as necessary to divert runoff. Berms should be constructed with compacted soil, have a minimum top width of 60 cm and a minimum height of 30 cm, and should allow for 10% settlement. It should have side slopes with a gradient of at least 2:1. Runoff should be guided to a point where it will not cause damage. Scour by the discharge of runoff should be prevented. 	<p>Frequency: Weekly.</p> <p>Responsible Person: Scheme Supervisor.</p>
i. Minimise and if possible prevent the collection and removal of firewood during operation and maintenance.	Collection of firewood.	<ul style="list-style-type: none"> No vegetative matter may be removed for firewood. The collection and removal of firewood is not allowed. 	<p>Checks to ensure that there's no removal and collection of firewood by the employees.</p> <p>Frequency: Weekly.</p> <p>Responsible Person: Scheme Supervisor.</p>
j. Noise	Generation of noise	<ul style="list-style-type: none"> Install and maintain silencers on trucks and machinery. Repair faulty brakes. Operators should not use hooters for the purposes of general communication. 	<p>Visual inspection to ensure that activities that generate noise are minimised and if possible prevented.</p> <p>Frequency: Daily.</p> <p>Responsible Person: Scheme Supervisor.</p>
k. Driving	Increased risk for accidents	<ul style="list-style-type: none"> No operator will operate any equipment when he is under the influence of alcohol. 	Visual inspection to ensure that activities that generate

Objectives	Potential Impact	Management Action	
		<ul style="list-style-type: none"> Adhere to safety rules. Always keep your headlights on. Drivers must have the correct licence for the vehicle they are driving. 	<p>noise are minimised and if possible prevented.</p> <p>Frequency: Weekly.</p> <p>Responsible Person: Scheme Supervisor.</p>
l. To avoid potential chemical /hazardous substance pollution	Pollution	<ul style="list-style-type: none"> Designated areas for the storage of potentially hazardous material will be lined with concrete and secured. The bunded area will be of adequate capacity to contain 1.5 times the volume of the hazardous material to be stored in the bunded area. 	<p>Visual checks to ensure chemical/hazardous substances are stored appropriately.</p> <p>Frequency: Monthly.</p> <p>Responsible Person: Scheme Supervisor.</p>
m. To ensure correct procedures are in place to avoid environmental impacts associated with maintenance activities as well as proactive intervention to avoid, and if required, to respond to emergencies	Environmental Degradation	<ul style="list-style-type: none"> Establish regular reporting procedures on maintenance Undertake regular inspection and maintenance of all infrastructure to ensure in working order and to assess damaged / deficient equipment, as per the Operations and Maintenance Manual. Review, and if necessary, revise maintenance manual. Establish emergency procedures guidelines for the blockage/failure, flooding, contaminant removal and disinfection, power failure and fire of the scheme. Implement the response procedures when emergency incident occurs. 	<p>A review of the Operations and Maintenance Manual.</p> <p>Frequency: Bi-annual</p> <p>Responsible Person: NamWater Maintenance Team</p>

Objectives	Potential Impact	Management Action	
		<ul style="list-style-type: none"> • Complete the incident report checklist in the case of emergency and keep with monitoring records for submission. • Undertake annual education course for all operational staff. • Review, and if necessary revise emergency manual. 	

Table 2: Waste Management Table

Objectives	Potential Impact	Management Action	
a. To prevent the improper disposal of waste	Pollution	<ul style="list-style-type: none"> • Enforce a waste management programme. • All waste will be removed to an appropriate waste dump. • No waste should be buried. • General Waste: Includes wastepaper, plastic, cardboard, harmless organic (e.g. vegetables) and domestic waste. • Hazardous Substances include sewerage, fuels, lubrication oils, hydraulic and brake fluid, solvents, paints, anticorrosive, insecticides and pesticides, chemicals, acids etc. It should be disposed of at designated hazardous disposal sites. • Contaminated soil should be stored in drums and taken to the nearest appropriate waste dumpsite. • Do not change oil on uncovered ground. Drip trays will be used to catch oil when vehicles are repaired in the field. • Used oil and hydraulic fluids will not be discarded on the soil or buried. It will be removed from site and taken back to an appropriate dump. • In the event of a hazardous spill: • Immediately implement actions to stop or reduce the spill. • Contain the spill. 	<p>Visual check to ensure wastes is managed according to the waste management plan</p> <p>Frequency: Weekly.</p> <p>Person Responsible: Scheme Supervisor.</p>

Objectives	Potential Impact	Management Action	
		<ul style="list-style-type: none"> • Arrange implementation of the necessary clean-up procedures. • Collect contaminated soil, water and other materials and dispose it at an appropriate waste dumpsite. • Used solvents and grease should be stored in drums or other suitable containers. It should be sealed and recycled or disposed at an appropriate disposal site. • Hazardous waste should not be burnt. • Bunding, concrete slabs and/or other protective measures should be installed where hazardous materials are handled. • Ensure that the staff are informed and have information pertaining to the management of spills or ingestion. 	
b. Prevent diesel and oil spills during operation and maintenance and ensure adequate clean up.	Concrete, diesel and oil spills and inadequate clean up.	<ul style="list-style-type: none"> • Clean up concrete, fuel and oil spills immediately. • Clean small oil or fuel spills with an approved/appropriate absorbent material. • Contain oil or fuel spills in water using an approved oil absorbent fibre. • In cases where oil spills cannot be cleaned up immediately, monitor seepage into deeper soils and groundwater. • Do not bury polluted soil, but rather dispose it at an appropriate dump site. • Provide bunding at fuel storage and transfer sites. The bunding should be big enough to contain 110% of the 	<p>Checks to prevent and minimise oil and diesel spills and to ensure adequate clean up should spills occur.</p> <p>Frequency: Daily throughout the operation period.</p> <p>Responsible Person: Scheme Supervisor.</p>

Objectives	Potential Impact	Management Action	
		<p>volume of the tank. Where a bund wall encloses a group of tanks, the bund wall must be able to contain 110% of the volume of the largest tank in the group. Tanks must stand on a concrete slab, or otherwise have a sealed, base in order to prevent the leakage of contaminants into the soil.</p>	
c. Waste Management	Littering (Litter such as paper, plastic etc. can be blown away into the surrounding environment).	<ul style="list-style-type: none"> • No littering will be allowed. The operation and maintenance areas will be kept free of waste at all times. All maintenance sites will be cleaned daily before leaving the site. • Provide sufficient waste bins at worksites. Make sure that all waste is removed from the worksites. • Bins should be placed in pairs to ensure that one is always present while the other is being emptied. • Areas likely to generate higher quantities of waste shall be equipped with additional bins. • Refuse bins must be stable, i.e. cannot be tipped by animals, and have scavenger and baboon proof lids. • Make sure that the bins are covered so that plastic bags, paper etc. are not blown away. • Make sure that the bins are regularly emptied and the waste taken to an appropriate waste dumpsite. • The central waste storage vessel shall be emptied weekly or as necessary. 	<p>Checks to ensure that litter is disposed of correctly in bins provided.</p> <p>Frequency: Daily, at the end of the workday.</p> <p>Responsible Person: Scheme Supervisor.</p>

Table 3: Workshops, Vehicle and Equipment Management Table

Objectives	Potential Impact	Management Action	
a. Appropriate storage of machinery, vehicles, and materials.	Inappropriate storage of machinery, vehicles and materials may result in the possible damage/disturbance of nearby undisturbed environments.	<ul style="list-style-type: none"> • Store machinery, vehicles and materials only in demarcated areas. • Do not leave machinery and equipment standing around if not in use. • Do not store machinery, vehicles, or materials in undisturbed or rehabilitating areas 	<p>Regular inspection to ensure that machinery, vehicles, and equipment are stored in designated areas.</p> <p>Frequency: Daily.</p> <p>Responsible Person: Scheme Supervisor.</p>
b. Minimize the leakage of fuels and lubricants from vehicles and equipment.	The use of vehicles and equipment that may leak fuel and lubricants.	<ul style="list-style-type: none"> • Only service machinery and vehicles in designated areas. • Regularly check your vehicle for fuel and oil leaks. • Maintain vehicles and equipment in good conditions through regular and thorough servicing. • Inform the Foreman of leaking vehicles and machinery so that he can schedule repairs. • Only refuel on the bund created for that purpose. • Immediately clean any accidental fuel and oil spills – do not hose spills into the natural environment. • Dispose of contaminated soil as hazardous waste in the correct location on site. • If a mobile fuel bowser is used, then all refuelling shall occur with appropriate measures in place to prevent spillages (drip trays, funnels, non-dripping dispensing nozzles etc.) 	<p>Visual inspection to ensure that vehicles and equipment are in excellent condition and also to ensure that there is no leakage of fuels and lubricants.</p> <p>Frequency: Daily.</p> <p>Responsible Person: Scheme Supervisor.</p>

Objectives	Potential Impact	Management Action	
		<ul style="list-style-type: none"> • All mobile fuel browsers shall carry a spill kit that is adequately sized to contain at least a 200 litre spill. • Train staff in the correct procedure/technique to transfer fuels. • Make sure all vehicles are roadworthy. Repair faulty brakes, exhausts etc. immediately. • Fire extinguishers shall be present whenever undertaking any form of hot work, i.e. welding, gas cutting, angle grinding, etc. 	

Table 4: Health and Safety Management Table

Objectives	Potential Impact	Management Action	
a. Minimise the risk of HIV infection and the increase of STI's.	Risk of HIV infection.	<ul style="list-style-type: none"> Provide an AIDS awareness programme to all the staff. 	<p>Verify that an awareness and education programme on the risks of HIV/AIDS and recommended preventative measures has been conducted.</p> <p>Frequency: Monthly</p> <p>Responsible Person: Scheme Supervisor.</p>
b. Minimise the occurrence of injuries.	Injuries.	<ul style="list-style-type: none"> Make sure that all staff are equipped and know how to use safety and protective gear. This includes hard hats, goggles, hearing protectors, dusk masks, steel-toed shoes etc. Keep a comprehensive first aid kit at the scheme offices and at maintenance sites. Establish an emergency rescue system for evacuation of serious injured people. Emergency procedures for accidents should be communicated to all employees. Dangerous areas must be clearly marked and access to these areas controlled or restricted. Good driving and adherence to safety rules will result in a minimum number of road and workplace accidents. 	<p>Checks to ensure that correct procedures are followed and that protective clothing are worn at all times during scheme operations and maintenance.</p> <p>Frequency: Check weekly.</p> <p>Responsible Person: Scheme Supervisor.</p>

Objectives	Potential Impact	Management Action	
		<ul style="list-style-type: none"> • Fire extinguishers must be available at all refuelling sites. Staff should be trained to handle such equipment. • Nobody is allowed to dispose a burning or smouldering object in an area where it may cause the ignition of a fire. • Hazardous substances must be kept in adequately protected areas to avoid soil, air or water pollution. • Work areas, such as these for the maintenance of equipment, must be on concrete slabs. • Explosives should be stored according to the prescribed regulations. 	

9. SITE CLOSURE AND REHABILITATION

Rehabilitation is the process of returning the land in a given area that has been disturbed by operation and maintenance to its original state, or an otherwise determined state. Many projects, if not all, will result in the land becoming degraded to some extent. However, with proper rehabilitation most impacts associated with the operation and maintenance of the scheme and pipelines, could be mitigated and restored to an acceptable level. Poorly rehabilitated areas provide a difficult legacy issue for governments, communities and companies, and ultimately tarnish the reputation of companies as a whole.

Objectives of proper site closure and rehabilitation include the following:

- Reduction or elimination of the need for a long-term management program to control and minimise the long-term environmental impacts;
- Clean-up, treatment or restoration of contaminated areas (e.g., soils contaminated by oil or fuel spills, concrete spills, etc.). Excavation of contaminated material and disposal thereof in an acceptable manner.

Rehabilitation measures to implement:

- a. A site inspection will be held quarterly by the scheme supervisor after every maintenance work during operation of the scheme. Rehabilitation will be done to the satisfaction of the ENV section and MEFT.
- b. Frequent inspections of the scheme and effective follow-up procedures, to prevent minor defects from becoming major repair jobs.
- c. Make sure all soil polluted during maintenance work is properly stored in drums and removed to an appropriate waste dump.
- d. Make sure all windblown litter is removed once maintenance has seized.
- e. Make sure that all potential hazards (i.e., the sewerage pit) are properly closed and left in a safe and neat position.

Rehabilitation will be completed when the above have been achieved.

10. NAMWATER ENVIRONMENTAL CODE OF CONDUCT

What is an Environmental Code of Conduct?

It is a set of rules that everybody has to follow in order to minimise damage to the environment.

What is the ENVIRONMENT?

The ENVIRONMENT means the surroundings within which people live. The ENVIRONMENT is made up of the **soil, water, plants, and animals** and those characteristics of the soil, water, air, and plant and animal life that influence **human health and well-being**. **People and all human activities** are also part of the environment and have to be considered during the operation of the Scheme.

Do these ENVIRONMENTAL RULES apply to me?

YES, The Environmental Rules apply to EVERYBODY. This includes all permanent, contract, or temporary workers as well as any other person who visits the Scheme. Every person will be required to adhere to the Environmental Code of Conduct.

ALL PERSONNEL must study and keep to the Environmental Code of Conduct

The SCHEME SUPERVISOR will issue warnings and will discipline ANY PERSON who breaks any of the Environmental Rules. Repeated and continued breaking of the Rules will result in a disciplinary enquiry and which may result in that person being asked to leave the Scheme permanently.

What if I do not understand the ENVIRONMENTAL RULES?

ASK FOR ADVICE, if any member of the WORKFORCE does not understand, or does not know how to keep any of the Environmental Rules, that person must seek advice from the SCHEME SUPERVISOR. The PERSON that does not understand must keep asking until he/she is able to keep to all the Environmental Rules.

Safety and Security

1. Only enter and exit roadways and construction areas at demarcated entrances.
2. Wear protective clothing and equipment as per signboards at the Scheme and according to instructions from your SCHEME SUPERVISOR.
3. Report to your SCHEME SUPERVISOR if you see a stranger or unauthorised person in the construction area.
4. Never enter any area that is out of bounds or that is demarcated as dangerous without permission of your SCHEME SUPERVISOR.
5. Never climb over any fence or enter private property without permission of the landowner or your SCHEME SUPERVISOR.
6. Do not remove any vehicle, machinery, equipment, or any other object from the maintenance site without the permission of your SCHEME SUPERVISOR.
7. Keep clear of blasting sites. Follow the instructions of your SCHEME SUPERVISOR.
8. Never enter or work in the Scheme while under the influence of alcohol or other intoxicating substances.
9. All staff should know the emergency procedures in case of accidents.

Waste Disposal

10. Learn the difference between different types of waste, namely:

- general waste, and
- hazardous waste.

Containers will be provided for different types of wastes.

General Waste includes wastepaper, plastic, cardboard, harmless organic (e.g., Vegetables) and domestic waste

Hazardous Waste includes objects, liquids or gases that are potentially dangerous or harmful to any person or the environment. Sewage, fuel, tyres, diesel, oils, hydraulic and brake fluid, paints, solvents, acids, soaps and detergents, resins, old batteries, etc. are all potentially hazardous.

11. Learn how to identify the containers for the different types of wastes. Only throw general waste into containers, bins or drums provided for general waste.
12. Recycle drums, pallets and other containers.
13. Never bury or burn any waste on site, all waste is to be disposed in allocated refuse disposal containers, bins or bags.
14. Never overfill any waste container. Inform your SCHEME SUPERVISOR if you notice a container that is nearly full.
15. Do not litter.
16. Do not bury litter or rubbish in the backfill trench.

Plants and Animals

17. **Do not ever pick any plants or catch any animal.** People caught with plants or animals in their possession will be handed to the authorities for prosecution.
18. Never feed, tease, play with, or set devices to trap any animal or livestock. Wild animals are not to be domesticated.
19. Keep off the rock outcrops unless given specific permission by the SCHEME SUPERVISOR to be there.
20. Never cut down any tree or branches for firewood.
21. Never leave rubbish or food scraps or bones where it will attract animals, birds, or insects.
22. Rubbish must be thrown into allocated waste disposal bins/bags.
23. Always close the gates behind you.

Preventing Pollution

24. Only work with hazardous materials in bunded areas.
25. Never discard any hazardous substances such as fuel, oil, paint, solvent, etc. into stream channels or onto the ground. Never allow any hazardous substances to soak into the soil.
26. Clean up spills immediately.
27. Immediately report to your SCHEME SUPERVISOR when you spill, or notice any hazardous substance overflow, leak or drip or spill on site, into the streambeds or along the road.
28. Immediately report to your SCHEME SUPERVISOR when you notice any container, which holds hazardous substances overflow, leak or drip. Spillage must be prevented.

- 29. Only wash vehicles, equipment and machinery, containers and other surfaces at work site areas designated by your SCHEME SUPERVISOR.
- 30. Do not change oil on uncovered surfaces.
- 31. If you are not sure how to transport, store, use, or get rid of any hazardous substances ask your SCHEME SUPERVISOR for advice.

Health

- 32. Drink lots of clean water every day.
- 33. Use toilets that have been provided.
- 34. Take the necessary precautions to avoid contracting HIV / AIDS. Condoms are available at most Clinics.
- 35. Inform your SCHEME SUPERVISOR when you are sick.
- 36. Do not work with any machinery when you are sick.
- 37. If you are working in malaria areas, you must take the necessary precautions.

Dust Control

- 38. Do not make any new roads or clear any vegetation unless instructed to do so by your SCHEME SUPERVISOR.
- 39. Keep to established tracks and pathways.
- 40. Keep within demarcated work areas.

Saving Water

- 41. Always use as little water as possible. Reduce, re-use and recycle water.
- 42. Never leave taps or hose pipes running. Close all taps after use.
- 43. Report any dripping or leaking taps and pipes to your SCHEME SUPERVISOR.

Working Hours

- 44. You may only work on weekends and after hours with the consent of the SCHEME SUPERVISOR.

Archaeological and Cultural Objects

- 45. If you find any archaeological, cultural, historical or pre-historical object on the maintenance site you must immediately notify your SCHEME SUPERVISOR.
- 46. Never remove, destroy, or disturb any cultural, historical, or pre- historical object on site.

Cultural and Historical Objects include old buildings, graves or burial sites, milestones, old coins, beads, pottery and military objects.

Pre-Historical objects include fossils and old bones, old human skeletal remains, pieces of pottery and old tools and implements.

Sensible Driving

- 47. Tracks and roads should be kept to a minimum. Where possible follow existing roads.
- 48. No off-road driving is allowed.
- 49. Never drive any vehicle without a valid licence for that vehicle class and do not drive any vehicle that is not road-worthy.

- 50. Never drive any vehicle when under the influence of alcohol.
- 51. **Always** keep your headlights on when driving on dusty roads.
- 52. Keep to the roads as specified by your SCHEME SUPERVISOR. Vehicles may only be driven on demarcated construction roads. Drivers should always use three points turns; “u-turns” are not allowed. Do not cut corners.
- 53. Do not drive on rocky outcrops.

Noise

- 54. Keep noise levels as low as possible.
- 55. Do not operate noisy equipment outside normal working hours.

Fire Control

- 56. Do not make open fires, use a drum or tin and do not collect any vegetation to burn.
- 57. Do not smoke or make fires near refuelling depots or any other area where fuel, oil, solvents, or paints are used or stored. Fireplaces should be at a safe distance from fuel and explosive storage sites as well as vehicle parking sites.
- 58. Cigarette butts should always be thrown in allocated refuse bins. Make sure that the cigarette butt is out before throwing it into the bin.
- 59. Immediately notify your SCHEME SUPERVISOR if you see an unsupervised fire at the campsite or maintenance site.

Dealing with Environmental Complaints

- 60. If you have any complaint about dangerous working conditions or potential pollution to the environment, talk to your SCHEME SUPERVISOR.
- 61. If any person complains to you about noise, lights, littering, pollution, or any harmful or dangerous condition, immediately report this to your SCHEME SUPERVISOR.

Jolanda Kamburona

Tell: 061-71 2105

Cell: 081 144 1528

or

Fillemon Aupokolo

Tell: 061-71 2095

Cell: 081 325 3301

11. REFERENCES

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ENVIRONMENTAL CLEARANCE CERTIFICATE

ECC – 2200031

22Msqe131



REPUBLIC OF NAMIBIA
MINISTRY OF ENVIRONMENT, FORESTRY AND TOURISM
OFFICE OF THE ENVIRONMENTAL COMMISSIONER

ENVIRONMENTAL CLEARANCE CERTIFICATE

ISSUED

In accordance with Section 37(2) of the Environmental
Management Act (Act No. 7 of 2007)

TO

Namibia Water Corporation
Private 13389, 176 Iscor Street, Northern Industry

TO UNDERTAKE THE FOLLOWING LISTED ACTIVITY

The proposed continuation of the Kombat Mine Water Supply Scheme and
Maintenance to Infrastructure, Otjozondjupa

Issued on the date: 2022-12-12
Expires on this date: 2025-12-11

(See conditions printed over leaf)

This certificate is printed without erasures or alterations



GRIEVANCE PROCEDURE

All grievances should be submitted through the completion of the grievance registration form as presented below and submitted to the Scheme Supervisor during the construction phase and to the Scheme Superintendent during the operation and maintenance phase.

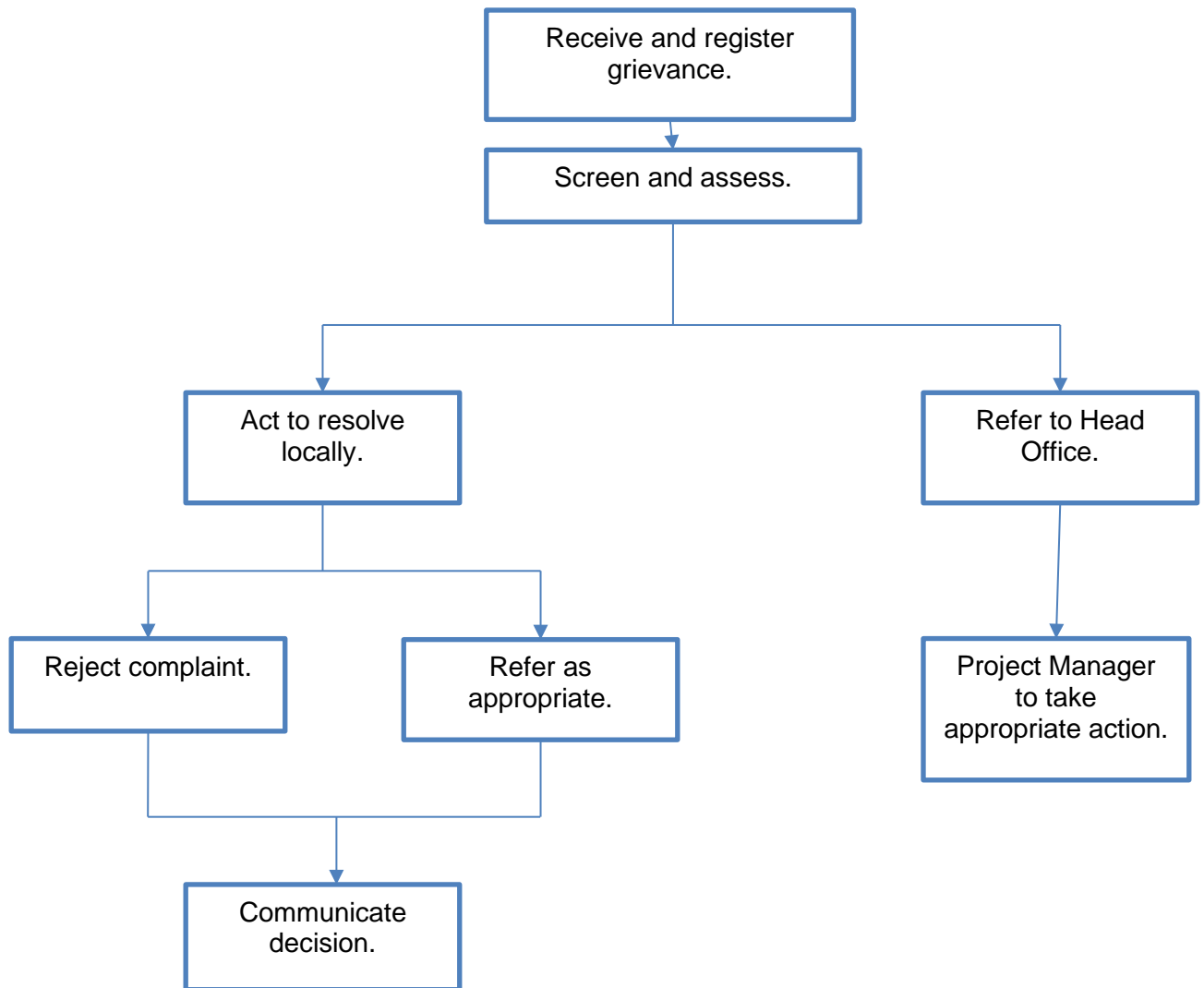


Figure 4: Grievance response procedure

Upon receipt of the registered grievance forms, the Scheme Supervisor shall screen and assess to either act to solve the grievance locally or refer it to head office. If the grievance is referred to the head office, the line manager should decide. If the grievance is to be solved locally, it should either be rejected or handled appropriately of which the decision should be communicated to the aggrieved person.

GRIEVANCE REGISTRATION

Grievance Registration	
Case No:	Date:
Name of complainant:	Cell no:
	Email address:
Details of grievance: (Date, location, persons involved, frequency of occurrence, effects of ensuing situation, etc)	
Name of person recording grievance:	Cell number:
Proposed date of response:	
Signature of recording person:	Signature of complainant:
Date of redress:	