

ENVIRONMENTAL IMPACT ASSESSMENT FOR THE OPERATION OF AN ABATTOIR / SLAUGHTERHOUSE ON THE REMAINDER OF PORTION 87 OF FARM BRAKWATER NO. 48, WINDHOEK, KHOMAS REGION

July 2025

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Project Name:	ENVIRONMENTAL IMPACT ASSESSMENT FOR THE OPERATION OF AN ABATTOIR / SLAUGHTERHOUSE ON THE REMAINDER OF PORTION 87 OF FARM BRAKWATER NO. 48, WINDHOEK, KHOMAS REGION	
The Proponent:	BV Investments Twenty-Six CC PO Box 5663 Windhoek	
Prepared by:	Green Earth ENVIRONMENTAL CONSULTANTS 1st floor Bridgeview Offices & Apartments, No. 4 Dr Kwame Nkrumah Avenue, Klein Windhoek, Namibia PO Box 6871, Ausspannplatz, Windhoek	
Release Date:	July 2025	
Consultant:	C. Du Toit C. Van Der Walt Cell: 081 127 3145 Email: charlie@greenearthnamibia.com	

EXECUTIVE SUMMARY

Green Earth Environmental Consultants were appointed by the Proponent, BV Investments Twenty-Six CC, to conduct an Environmental Impact Assessment to obtain an Environmental Clearance for the Indraai Abattoir which is located on the Remainder of Portion 87 of the Farm Brakwater No. 48, Windhoek, Khomas Region. The land within the immediate vicinity of the project site is predominately characterized by residential, commercial, and business activities.

In terms of the Regulations of the Environmental Management Act (No 7 of 2007) an Environmental Impact Assessment must be done to address the following 'Listed Activities':

WASTE MANAGEMENT, TREATMENT, HANDLING AND DISPOSAL ACTIVITIES

- 2.1 The construction of facilities for waste sites, treatment of waste and disposal of waste
- 2.2 Any activity entailing a scheduled process referred to in the Atmospheric Pollution Prevention Ordinance, 1976.
- 2.3 The import, processing, use and recycling, temporary storage, transit or export of waste.

The key characteristics/environmental impacts of the proposed project are as follows:

Impact on environment	Nature of impact
More efficient and intensive use of land.	Positive for Brakwater, Windhoek and
	Namibia in general.
Creation of employment and transfer of	Positive as employment is created
skills.	during operation.
Provision of additional land portions.	Positive as land is required.
Impact on utilization of municipal and other	Positive due to the better utilization of
infrastructure and facilities.	existing municipal infrastructure.
The creation of dust.	Negative during operation and use as
	some of the roads will be gravel roads.
There will be an impact on traffic.	Negative during operation as the site
	will result in the increase in traffic in the
	town and on the main roads in the
	area.
The creation of noise.	Low and on par with the noise levels
	associated with the residential uses on
	the neighbouring land.
Possible impact on cultural/heritage aspects.	No items of archeologic value or
	graves were observed during the site
	visit which means the impact will be
	low. If any items or graves are found
	during construction, the impact will be
	high and irreversible.
Impact on fauna and flora.	Limited impact on the fauna and flora

	since most infrastructure are already on site. Permits must be obtained to remove protected tree species.	
There might be a possible visual impact.	No new infrastructure will be constructed.	
Impact on groundwater, surface water and soil.	The impact will be negative in case of spilling of hazardous materials.	
Impact on health and safety.	Low if mitigated during operations.	

The negative impacts associated with the project are the impact on the vegetation, the natural drainage systems, noise and dust, the danger of residents and visitors being injured, the transmission of diseases from people or to people and the loss of land. However, mitigation measures will be provided that can control the extent, intensity, and frequency of these named impacts in order not to have substantial negative effects or results.

The type of activities that will be carried out on the site will not negatively affect the amenity of the locality and the activities do not adversely affect the environmental quality of the neighbouring portions or areas. None of the potential impacts identified are regarded as having a significant impact to the extent that the proposed project should not be allowed. However, the operational activities further on need to be controlled and monitored by the assigned subcontractors and the proponent.

The Environmental Impact Assessment which follows upon this paragraph was conducted in accordance with the guidelines and stipulations of the Environmental Management Act (No 7 of 2007) meaning that all possible impacts have been considered and the details are presented in the report.

Based upon the conclusions and recommendations of the Environmental Impact Assessment Report and Environmental Management Plan following this paragraph, the Environmental Commissioner of the Ministry of Environment, Forestry and Tourism is herewith requested to:

- 1. Accept the Environmental Impact Assessment.
- 2. Approve the Environmental Management Plan.
- 3. Issue an Environmental Clearance for the Indraai Abattoir which is located on the Remainder of Portion 87 of the Farm Brakwater No. 48, Windhoek, Khomas Region and for the following "listed activities":

WASTE MANAGEMENT, TREATMENT, HANDLING AND DISPOSAL ACTIVITIES

- 2.1 The construction of facilities for waste sites, treatment of waste and disposal of waste
- 2.2 Any activity entailing a scheduled process referred to in the Atmospheric Pollution Prevention Ordinance, 1976.
- 2.3 The import, processing, use and recycling, temporary storage, transit or export of waste.

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LIST OF ABBREVIATIONS

CAN Central Area of Namibia

COW City of Windhoek

EC Environmental Clearance

ECO Environment Control Officer

EIA Environmental Impact Assessment

EMP Environmental Management Plan

I&APs Interested and Affected Parties

MEFT Ministry of Environment, Forestry and Tourism

SQM Square Meters

1. INTRODUCTION

The Proponent, BV Investments Twenty-Six CC, appointed Green Earth Environmental Consultants to conduct an Environmental Impact Assessment and develop an Environmental Management Plan to obtain an Environmental Clearance for the Indraai Abattoir which is located on the Remainder of Portion 87 of the Farm Brakwater No. 48, Windhoek, Khomas Region. The Environmental Management Act (No. 7 of 2007) and the Environmental Impact Assessment Regulations (GN 30 in GG 4878 of 6 February 2012) stipulates that an Environmental Impact Assessment (EIA) report and management plan are required as the following 'Listed Activities' are involved:

WASTE MANAGEMENT, TREATMENT, HANDLING AND DISPOSAL ACTIVITIES

- 2.1 The construction of facilities for waste sites, treatment of waste and disposal of waste
- 2.2 Any activity entailing a scheduled process referred to in the Atmospheric Pollution Prevention Ordinance, 1976.
- 2.3 The import, processing, use and recycling, temporary storage, transit or export of waste.

The Environmental Impact Assessment below contains information on the proposed project and the surrounding areas, the proposed activities, the applicable legislation to the study conducted, the methodology that was followed, the public consultation that was conducted, and the receiving environment's sensitivity and any potential ecological, environmental, and social impacts.

2. TERMS OF REFERENCE

To be able to implement the proposed project, an Environmental Impact Assessment and Environmental Clearance is required. For this environmental impact exercise, Green Earth Environmental Consultants followed the terms of reference as stipulated under the Environmental Management Act.

The aim of the environmental impact assessment was:

- To ascertain existing environmental conditions on the site to determine its environmental sensitivity.
- To inform I&APs and relevant authorities of the details of the proposed development and to provide them with an opportunity to raise issues and concerns
- To assess the significance of issues and concerns raised.
- To compile a report detailing all identified issues and possible impacts, stipulating the way forward and identify specialist investigations required.
- To outline management guidelines in an Environmental Management Plan (EMP) to minimize and/or mitigate potentially negative impacts.

- To comply with Namibia's Environmental Management Act (2007) and its regulations (2012).

The tasks that were undertaken for the Environmental Impact Assessment included the evaluation of the following: climate, water (hydrology), vegetation, geology, soils, socio economic impact, cultural heritage, groundwater, sedimentation, erosion, biodiversity, sense of place, socio-economic environment, health, safety and traffic.

The EIA and EMP from the assessment will be submitted to the Environmental Commissioner for consideration. The Environmental Clearance will only be obtained (from the DEA) once the EIA and EMP has been examined and approved for the listed activity.

The public consultation process as per the guidelines of the Act has been followed. The methods that were used to assess the environmental issues and alternatives included the collection of data on the project site and surrounding area, info obtained from the proponent and the Ministry of Environment, Forestry and Tourism and identified and affected stakeholders. Consequences of impacts were determined in five categories: nature of impact, expected duration of impact, geographical extent of the event, probability of occurring and the expected intensity.

All other permits, licenses or certificates that are further on required for the operation of the proposed project still needs to be applied for by the proponent.

3. NEED, DESIRABILITY AND MOTIVATION

<u>Need</u>

The abattoir trading under the name of Indraai Abattoir, is in operation for the past 25 years. It is a small abattoir slaughtering approximately 10 sheep and 50 cattle per week and is supported by small butcheries, kapana makers and home shops for providing meat products to the Windhoek public. Small farmers bringing sheep or cattle in small numbers to be shared or sold to family and friends also make use of the abattoir to slaughter animals. Thus the abattoir provides a necessary service for the small farmers and meat traders which cannot make use of large abattoirs like the Meatco facility.

From the above, the need of the proposed facility is confirmed.

Desirability

The Remainder of Portion 87 of Farm Brakwater No. 48 where the abattoir is located, is the ideal site for the operations of the abattoir because of the following reasons:

- The site is located in the rural areas of City of Windhoek but close enough to provide services to small farmers and traders requiring slaughtering services in Windhoek.
- The site has good access as it is located close to Main Road A1 with an approved intersection from where the site can be accessed by District Road

- 1545. Vehicles used for transporting/delivering sheep and cattle and customers collecting meat can safely access the abattoir site via this access road.
- The site is connected to City of Windhoek / NamWater water supply system servicing this area of Brakwater which supplies sufficient water for the purposes of operating the abattoir.
- The Portion is linked to the existing NamPower network from which electricity can be obtained.
- The topography of the site is generally flat with a gradual slope and thus ideal to accommodate the abattoir and supporting infrastructure without the requirement of major landscaping/groundworks.
- The site is not close to any residential areas which are normally sensitive for odours associated with the operation of an abattoir.
- The site is close enough to Windhoek to allow employees to reside in town and commute to work daily.

The site is desirable for the proposed operations, the activities have a limited impact on the bio-physical environment, enough water is available for the operations and has a proper and safe access.

Determining what the impact of the operations would be are broken down into different categories and environmental aspects and dealt with in the Environmental Management Plan (EMP). As per the ISO 14001 definition: an environmental aspect is an element of an organization's activities, products and/or services that can interact with the environment to cause an environmental impact e.g., land degradation or land deterioration among others, that will cause harm to the environment.

All concerns and potential impacts raised during the public participation process and consultative meetings were evaluated. Predictions were made with respect to their magnitude and an assessment of their significance was made according to the following criteria:

The Nature of the activity: The possible impacts that may occur are that water will be used in the construction and operational phases, wastewater will be produced that will be handled, land will be used for the proposed activities, a sewage system will be constructed, and general construction activities will take place, namely the building of infrastructure.

The Probability of the impacts to occur: The probability of the above-named impacts to occur and have a negative or harmful impact on the environment and the community is small since the Environmental Management Plan will also guide these activities. Water will still be used, and wastewater produced, however guidelines will be set that will ensure the impact is minimum.

The Extent of area that the project will affect: The specific project will most likely only have a small impact on the proposed project site itself and not on the surrounding or neighbouring land except for noise, traffic, roads, electricity and dust and there may be a visual impact because of the size of the proposed development. Therefore, the extent that the project will have a negative impact on is not extensive.

The Duration of the project: The duration of the project is uncertain. Water will still be used, and waste produced on a continuous basis and the structures that were constructed will remain and may be visually unpleasing to surroundings.

The Intensity of the project: The intensity of the project is mostly limited to the site however for the above-named items/processes where the intensity of the project will be felt outside the borders of the project site.

According to the information that was present while conducting the Environmental Impact Assessment for the construction and operation of the project, no high-risk impacts were identified and therefore it is believed that the operations will be feasible in the short and long run. Most of the impacts identified were characterized as being of a low impact on the receiving and surrounding environment and with mitigation measures followed, the impacts will be of minimum significance or avoided.

4. BACKGROUND INFORMATION ON PROJECT

The Indraai Abattoir has been in operation for more than 25 years. An average of 10 sheep and 50 cattle are slaughtered per week.

4.1.LOCATION, SIZE AND ZONING

The abattoir is located on the Remainder of Portion 87 of Farm Brakwater No. 48. The Portion (a portion of Portion H) of the Farm Brakwater No. 48 is located east of the B1 Windhoek to Okahandja dual-carriage road and west of the Klein Windhoek River. It is directly adjacent the well-known Gallina Motocross track and Waldschmidt Eggs on the Remainder of Portion H of the Farm Brakwater No. 48. The Windhoek - Okahandja Railway Line is located to the east of Portion 87/H/48. See below the plans showing the locality of the Project Site:

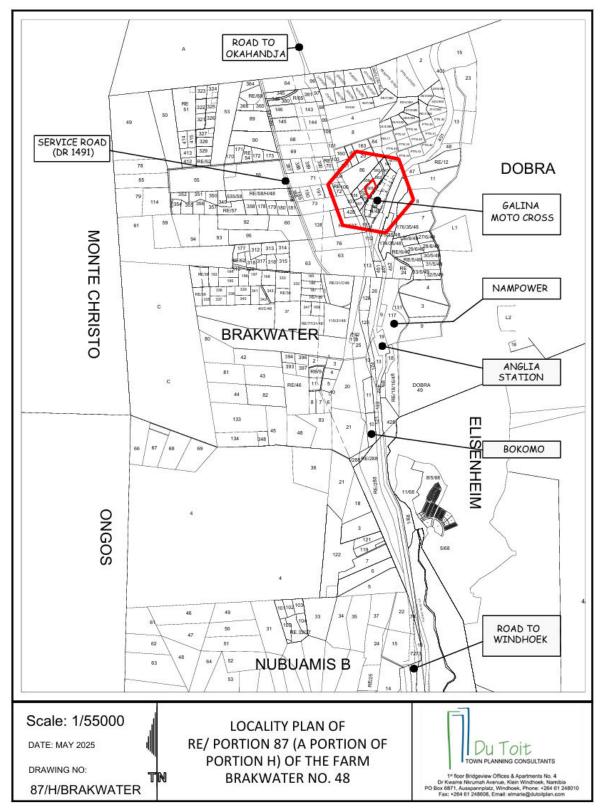


Figure 1: Locality Plan of Portion 87, Farm Brakwater

The Remainder of Portion 87 is 3,4728ha in extent and zoned 'industrial' with a bulk of 0.1.

See below the plans showing the zoning of the project site as well as photos showing the surrounding uses and facilities on site:

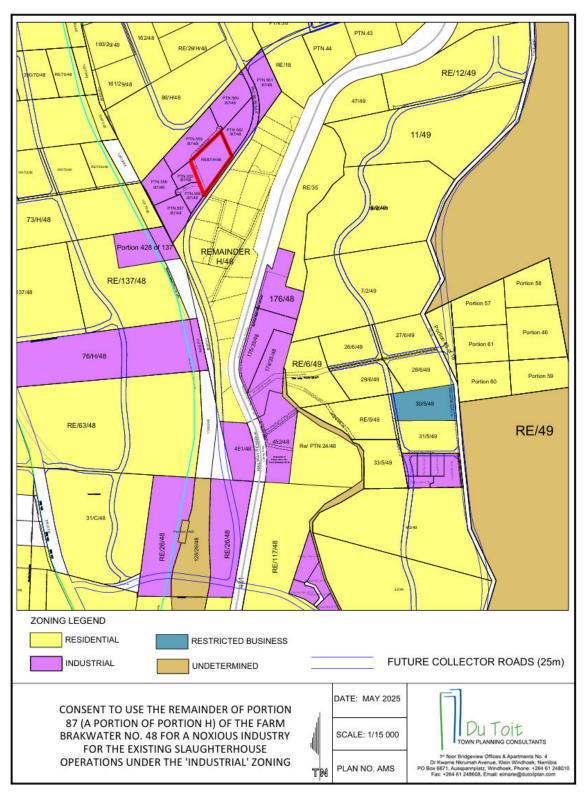


Figure 2: Zoning Map of the area indicating Portion 87 as "industrial"

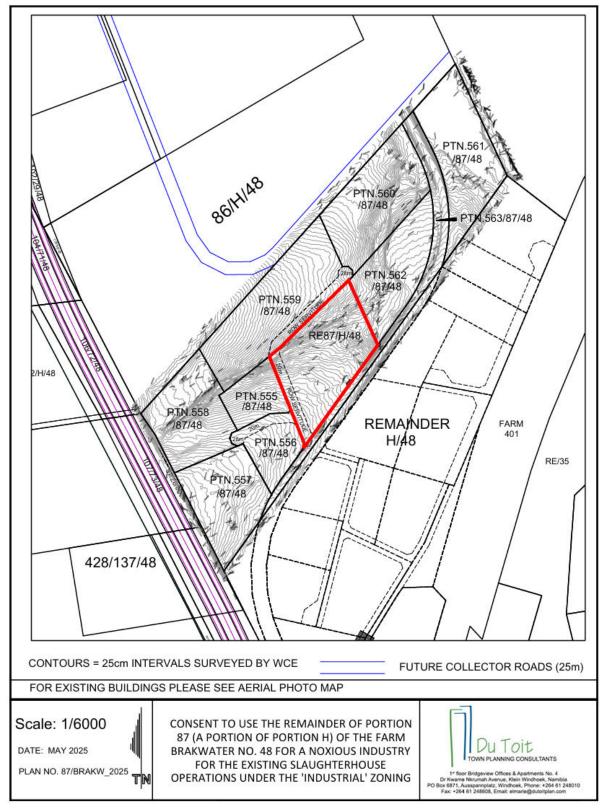
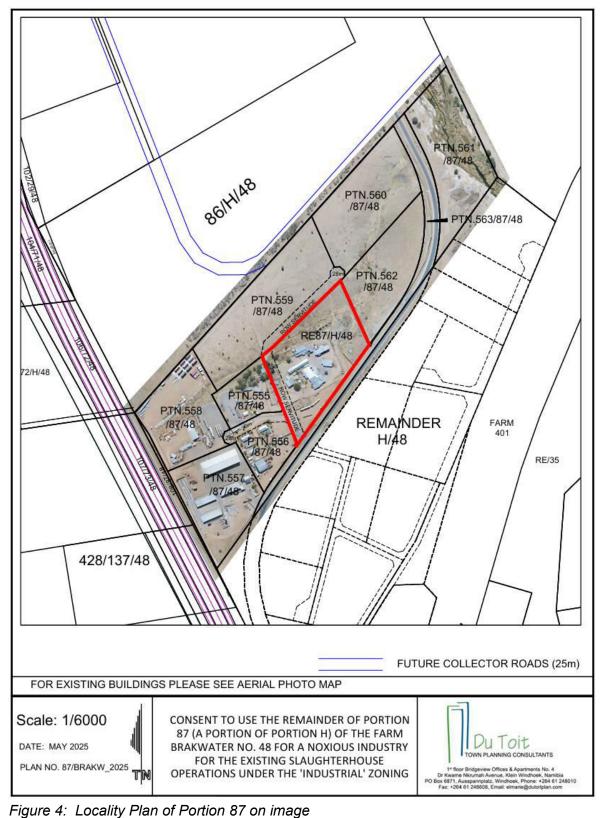


Figure 3: Subdivision Plan with contours



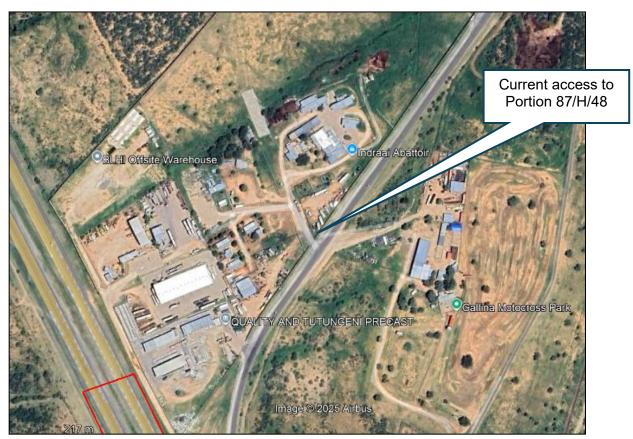


Figure 5: Google Image of Portion 87/H/48



Figure 6: Abattoir operational area



Figure 7: Abattoir facilities (1)



Figure 8: Abattoir facilities



Figure 9: Parking area for staff vehicles

There are also some residential dwellings for staff of the slaughterhouse and other activities on the Project Site.

4.2.TOPOGRAPHY

The terrain can be considered flat, as most of it has been levelled. There is a natural shallow watercourse flowing in an easterly direction towards the Klein Windhoek River (largely part of Portion 7) over proposed Portions 558, 559, 561, 562 & Re/87/H/48. See *Map* below the watercourse:

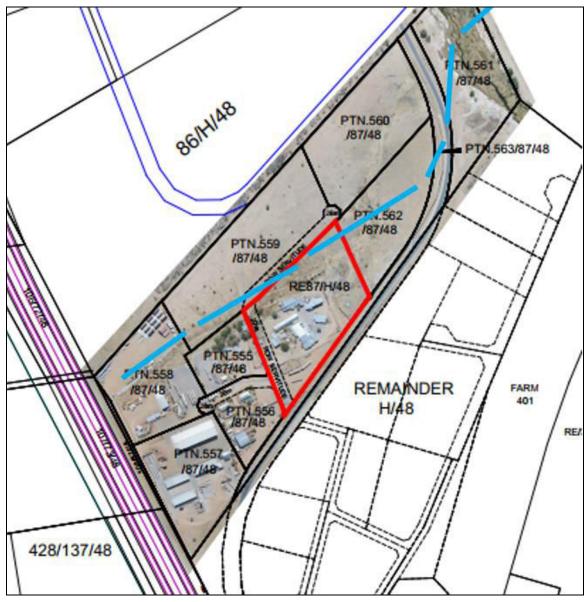


Figure 10: Watercourse over Portion 87/H/48

4.3. SURROUNDING USES & CHARACTERISTICS

Indraai Abattoir has been in existence for at least 25 years and there are no changes to the current abattoir. The surrounding uses are all of an industrial nature. It ranges from warehousing for general storage to transportation and logistical companies that need space for all their heavy vehicles. Some other businesses were also established on the other portions to the west of Indraai Abattoir.

5. CURRENT ABATTOIR OPERATIONS

Under the current operations, ±10 sheep and 50 cattle are slaughtered per week. The sheep and cattle are sourced from farmers or delivered to the abattoir by clients selling meat products in Windhoek.

The daily activities are as follows:

Sheep and cattle are receival by road transport, offloading, identify by ID (electronic tag), record, and live weighing.

- Ante-mortem veterinary inspection, lairing (overnight), pens with covering, and driving to stun.
- Stun, ritual slit and bleed, age determination, and hide dressing. Dedicated blood collection, (not into wash water) conveying to road storage tank for surface at waste treatment site.
- Evisceration, synchronized inspection (head, hooves, offal with carcass), halving into sides, classification/grading, weigh, and identify by label.
- Sides chill down to 6°C "deep bone" and 2% moisture loss.
- Sides/quarters weigh out (capture in production control system), fresh load-out and dispatch.
- Process control system capturing and recording and transmitting by LSU for full traceability.
- Red offal separation into red offal products, wrapped, packed into cartons, weigh, label and strap.
- Rough offal separation and cleaning into edible white offal products, wrapped, packed into cartons, weighed, labelled and strapped.
- Paunch and intestines content (manure) to be captured separately and conveyed to waste containment and treatment thereby minimizing organic solids load of abattoir effluent.
- Offal carton freeze down to -18°C.
- Offal frozen holding, and offal dispatch.
- Storage for packaging material / consumables under dust free conditions and pest controlled.
- Storage for chemicals / pesticides / hazardous materials.

Value addition activities such as de-boning and others to the specification of markets:

- Weigh in sides and capture into production control system.
- Cut-up sides/guarters for bone-in products, wrap/pack, weigh, label.
- Remove primal cuts (from sides or quarters, preferred on rail method), trim, bag, vacuum pack, weigh, label, deep chill, pack into cartons, weigh, label, strap, and scan cartons.
- Wrap, pack factory beef into cartons, weigh, label, and strap.
- Chill or freeze packaged (bone-in/boneless) beef.
- Chilled and Frozen Holding.
- Load out and dispatch.
- The chain of full control and traceability must be unbroken at all times.

How meat is produced and sold:

• Prime cuts are packed and distributed to clients and shops.

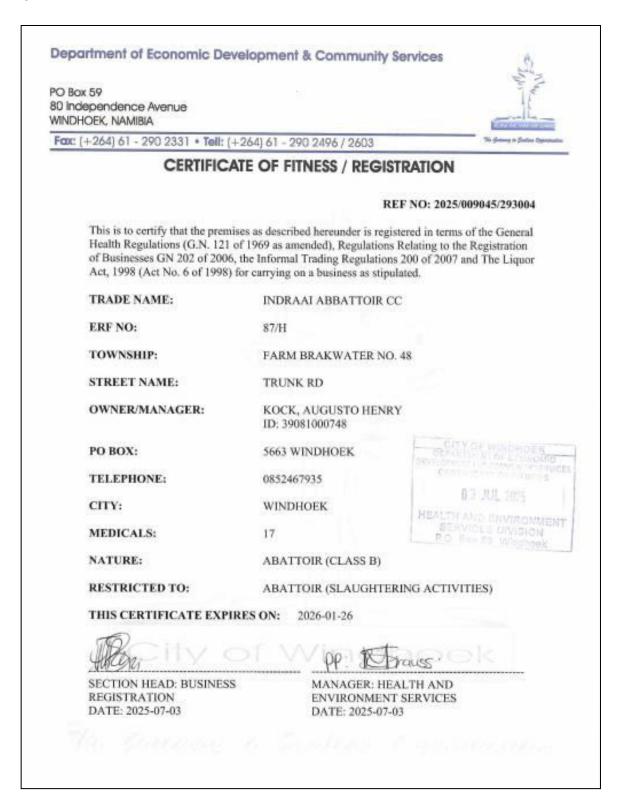
• Various value-added products are sold to the public nationwide via supermarkets and other retailers.

Current employment:

15 - 20 people are employed on the site pending the number of animals slaughtered. The infrastructure of the abattoir consists of the sheep and cattle abattoir with supporting infrastructure like temporary sheep and cattle holding pens, administrative offices, water storage facilities and cold storage facilities on site.

6. APPROVAL OBTAINED

City of Windhoek issued a Certificate of Fitness / Registration for the abattoir (Indraai Abattoir) to carry on with the business of an abattoir. See below a copy of the valid Certificate of Fitness:



An Environmental Clearance is required to continue with the operations of the abattoir.

7. BULK SERVICES AND INFRASTRUCTURE

The necessary infrastructure is available on Portion 87/H/48 due to it being partially developed for many years already. The site is supported by the following services:

7.1.ACCESS

The current access to the Remainder of Portion 87 and the other portions are from the Döbra Interchange on the A1 National Road, whereafter it follows District Road 1545. Part of District Road 1545 between Portion 87/H/48 and the Remainder of Portion H of the Farm Brakwater No. 48 is newly built.

With the subdivision of Portion 87/H/48, the collector road over the Remainder of Portion H of the Farm Brakwater No. 48 needed to change to accommodate access to Portion 87/H/48.

The sections of District Road D1545 which form part of Portion 87/H/48 was subdivided – now Portion 563 (± 1,5708ha) and will be registered to the City of Windhoek per Title Deed T4032/2024, once the donation agreement with City of Windhoek is done.

The 20m right of way servitude along the western boundary of the Remainder of Portion 87 is registered on the Title Deed of the Remainder against the other portions to secure access to them.

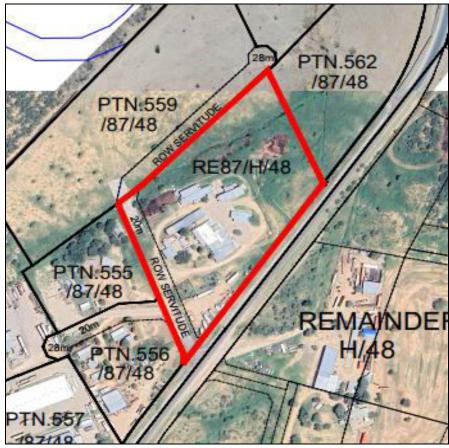


Figure 11: RoW servitude on western boundary of Re/87/H/48

7.2. WATER SUPPLY

The current slaughterhouse operation on the Remainder of Portion Re/87/H/48 is supplied with water by the City of Windhoek through the existing Brakwater/Döbra network which is connected to the main supply line of NamWater. No borehole exists on the portion. Water is mainly required for the daily cleaning of the slaughterhouse activities in order to maintain the required health standards, for providing drinking water to the animals waiting to be slaughtered and to the residential units for human consumption.

7.3.ELECTRICITY

NamPower is currently supplying power to the entire Portion 87/H/48, it is sufficient for the existing activities and more specifically the slaughterhouse since it has been in existence for many years.

7.4. TREATMENT OF ABATTOIR WASTE

There is currently no municipal sewer network in the Brakwater and Döbra area. Process effluent is dumped in conservancy tanks which is collected by COW on a regular basis and is disposed of at their approved landfill site. Household sewer is collected in a Frensh drain and soakaway system.

Three waste streams are applicable to the abattoir: Process effluent and domestic effluent and solid waste.

7.4.1.PROCESS EFFLUENT

The Process Effluent includes the following:

- Blood
- Lairages and wash bay effluent
- Paunch and stomach contents
- Condemns and special risk materials
- · Fats, oils and grease

Blood Handling: Blood from the bleeding area in the abattoir slaughter process is directed to a dedicated blood sump and be kept separate from the effluent stream. It is then collected in a skip container for collection by COW and transported off-site for proper disposal, adhering to biosecurity and environmental standards at an approved landfill site.

Lairages and wash bay effluent: Solid waste in Lairages is cleaned manually by means of dry-scraping and cleaning before washing; minimising the solids entering the effluent conveyance system. The lairages and wash bay areas are then cleaned by hosing down the concrete areas. The effluent is screened to remove remaining coarse solids by means of a grid over collection channels and inlet manhole. A sand trap has been constructed for wastewater from both the lairages and the wash bay areas in addition to a grease/oil trap to remove oil and grease from the wastewater generated on the wash bay. The wastewater from both the lairages and the wash bay are directed to a set of four (4) conservancy tanks for collection and removal by COW.

The collection and effluent drainage system are designed as such that a connection to the required grit/oil/grease trap and the municipal sewer is possible as soon as these areas are covered and this becomes necessary due to larger volumes of wastewater being generated.

Paunch and stomach contents: The paunch content from the offal area is removed in the form of solid organic waste and disposed of into a skip container. The wastewater from the washing of the stomach and other intestines is screened as part of the process effluent. Strict operational control is applied to ensure that all edible offal is removed, and minimal fat enters the system. The skip container is collected and removed by COW for disposal at an approved landfill site.

Fats, oil and grease removal: Fats, oils and grease removal are done after screening has been done of the process effluent stream. This is done by means of an interceptor. The screenings collected from all the different screening processes together with the sludge generated by the fat and grit traps is disposed of in the skip container which is collected and removed by COW for disposal at an approved landfill site.

7.4.2. DOMESTIC EFFLUENT

The domestic wastewater stream is disposed of in an onsite French drain and soak away.

Odour treatment: Due to the remote location of the site and the regular removal of waist odour, treatment is not required. All processes aim to minimise the impact of odour as efficiently as possible by means of ventilation pipes and positioning in relation to the facility buildings.

Vector attraction: The screening and collection area surrounding the screens will be covered to avoid vector attraction in the form of rodents, house flies, mosquitoes, etc. and associated breeding.

Solids dewatering: No provision is currently made for the dewatering of solids.

7.5. SOLID WASTE

The solid waste produced from the abattoir and supporting activities are separated into household waste which includes spend packing materials and the process solid waste (punch content, condemned materials and special risk materials). The household solid waste is temporarily stored in an enclosed area from where it is collected by COW. The abattoir waste is stored in a skip which is regularly removed and emptied by COW.

The management of the waste related to the Indraai Abattoir is already closely monitored by the City of Windhoek's Health Department.

7.6.STORM WATER AND DRAINAGE

The natural flow of storm water and drainage will be minimally disturbed and the natural flow accommodated where possible. Smaller bridges and storm water structures will be constructed where necessary to allow the natural flow of storm water.

7.7. FIRE PROTECTION

The capacity and pressure of the Municipal water supply network does not allow for utilising the Municipal water network for onsite fire protection. The Proponent must therefore design and construct onsite water storage facilities to provide water for fire protection equipment with an emergency plan in case of a fire on site.

8. APPROACH TO THE STUDY

The assessment included the following activities:

a) Desktop sensitivity assessment

Literature, legislation and guidance documents related to the natural environment and land use activities available on the portion and area in general were reviewed to determine potential environmental issues and concerns.

b) Site assessment (site visit)

The proposed project site and the immediate neighbourhood and surrounding area were assessed through several site visits to investigate the environmental parameters on site to enable further understanding of the potential impacts on site.

c) public participation

The public was invited to give input, comments, and opinions regarding the proposed project. Notices were placed in the Namibian and New Era (see Appendix) on two consecutive weeks (13 and 20 June 2025) inviting public participation and comments on the proposed project. The closing date for any questions, comments, inputs or information was 4 July 2025. A notice was placed on the Notice Board of the City of Windhoek. A Background Information Document (BID) was sent to the neighbours. The closing date for comments / inputs on the BID was 25 July 2025.

d) Scoping

Based on the desk top study, site visit and public participation, the environmental impacts were determined in five categories: nature of project, expected duration of impact, geographical extent of the event, probability of occurring and the expected intensity. The findings of the scoping have been incorporated in the environmental impact assessment report below.

e) Environmental Management Plan (EMP)

To minimize the impact on the environment, mitigation measures have been identified to be implemented during planning, construction, and implementation. These measures have been included in the Environmental Management Plan to guide the planning, construction and operation of the development which can also be used by the relevant authorities to ensure that the project is planned, developed, and operated with the minimum impact on the environment.

9. ASSUMPTIONS AND LIMITATIONS

It is assumed that the information provided by the proponent is accurate. No alternative erven/portions/farms for the proposed project were examined. The site was visited several times and any happenings after this are not mentioned in this report. (The

assessment was based on the prevailing environmental conditions and not on future happenings on the site.) However, it is assumed that there will be no significant changes to the proposed project, and the environment will not adversely be affected between the compilation of the assessment and the implementation of the proposed activities.

10. ADMINISTRATIVE, LEGAL AND POLICY REQUIREMENTS

To protect the environment and achieve sustainable development, all projects, plans, programs and policies deemed to have adverse impacts on the environment require an EIA according to Namibian legislation. The administrative, legal and policy requirements to be considered during the Environmental Assessment for the proposed project are the following:

- The Namibian Constitution
- The Environmental Management Act (No. 7 of 2007)
- The Water Resources Management Act (No. 11 of 2013)
- The Windhoek Town Planning Scheme
- Other Laws, Acts, Regulations and Policies

THE NAMIBIAN CONSTITUTION

Article 95 of Namibia's constitution provides that:

"The State shall actively promote and maintain the welfare of the people by adopting, inter alia, policies aimed at the following:

Management of ecosystems, essential ecological processes and biological diversity of Namibia and utilization of living natural resources on a sustainable basis for the benefit of all Namibians, both present and future; in particular, the Government shall provide measures against the dumping or recycling of foreign nuclear and toxic waste on Namibian territory." This article recommends that a relatively high level of environmental protection is called for in respect of pollution control and waste management.

Article 144 of the Namibian Constitution deals with environmental law and it states:

"Unless otherwise provided by this Constitution or Act of Parliament, the general rules of public international agreements binding upon Namibia under this Constitution shall form part of the law of Namibia". This article incorporates international law, if it conforms to the Constitution, automatically as "law of the land". These include international agreements, conventions, protocols, covenants, charters, statutes, acts, declarations, concords, exchanges of notes, agreed minutes, memoranda of understanding, and agreements (Ruppel & Ruppel-Schlichting, 2013). It is therefore important that the international agreements and conventions are considered (see section 4.9).

In considering these environmental rights, BV Investments Twenty-Six CC (the Proponent) should consider the following in devising an action plan in response to these articles:

- Implement a "zero-harm" policy at that would guide decisions.
- Ensure that no management practice or decision result in the degradation of future natural resources.
- Take a decision on how this part of the Constitution will be implemented as part of the Proponent's Environmental Control System (ECS).

ENVIRONMENTAL MANAGEMENT ACT (NO. 7 OF 2007)

The Environmental Impact Assessment Regulations (GN 30 in GG 4878 of 6 February 2012) of the Environmental Management Act (No. 7 of 2007) that came into effect in 2012 requires/recommends that an Environmental Impact Assessment and an Environmental Management Plan (EMP) be conducted for the following listed activities to obtain an Environmental Clearance Certificate:

WASTE MANAGEMENT, TREATMENT, HANDLING AND DISPOSAL ACTIVITIES

- 2.1 The construction of facilities for waste sites, treatment of waste and disposal of waste
- 2.2 Any activity entailing a scheduled process referred to in the Atmospheric Pollution Prevention Ordinance, 1976.
- 2.3 The import, processing, use and recycling, temporary storage, transit or export of waste.

Cumulative impacts associated with the development must be included as well as public consultation. The Act further requires all major industries and mines to prepare waste management plans and present these to the local authorities for approval.

The Act, Regulations, Procedures and Guidelines have integrated the following sustainability principles. These need to be given due consideration, particularly to achieve proper waste management and pollution control:

Cradle to Grave Responsibility

This principle provides that those who handle or manufacture potentially harmful products must be liable for their safe production, use and disposal and that those who initiate potentially polluting activities must be liable for their commissioning, operation and decommissioning.

Precautionary Principle

It provides that if there is any doubt about the effects of a potentially polluting activity, a cautious approach must be adopted.

The Polluter Pays Principle

A person who generates waste or causes pollution must, in theory, pay the full costs of its treatment or of the harm, which it causes to the environment.

Public Participation and Access to Information

In the context of environmental management, citizens must have access to information and the right to participate in decisions making.

CONCLUSION AND IMPACT

The activity fits in with the surrounding activities and do not have a negative impact on the prevailing environment. The waste generated by the facility is handled in accordance with the City of Windhoek's solid waste and process effluent regulations and is removed by the City on a regular basis.

THE WATER RESOURCES MANAGEMENT ACT

The Water Resources Management Act No. 11 of 2013 which provides for the management, protection, development, use and conservation of water resources; to provide for the regulation and monitoring of water services and to provide for incidental matters, stipulates as follows:

Obligation to provide and operate systems for discharge of effluent, wastewater and waste

- 69. (1) A local authority and other water services providers or any other authority, body or person that controls or supplies water, is responsible to provide, manage and operate systems for the conveyance, treatment and disposal of wastewater produced in its area of operation, including, subject to section 70(2), industrial wastewater.
- (2) A local authority and other water services provider or an authority, body or person referred to in subsection (1) must perform the functions contemplated in that subsection:
- (a) under a licence to discharge effluent, a licence to construct or operate a wastewater treatment facility or a waste disposal site issued by the Minister; and
- (b) in accordance with the conditions to which the licence is subject.
- (3) A local authority or any other authority or person that has authority over any area in which any domestic or industrial activity that may cause pollution, takes place, is ultimately responsible for the prevention of any pollution in that area.

CONCLUSION AND IMPACT

The waste and process effluent created from the abattoir's activities is stored on site in a skip with a lid and conservancy tanks respectively and is removed by City of Windhoek for disposal at the Kupferberg Landfill site. These facilities are inspected on a regular basis by the COW's Health Department to ensure compliance.

THE WINDHOEK TOWN PLANNING SCHEME

The Windhoek Town Planning Scheme (as amended in Windhoek Amendment Scheme No. 96 – promulgated 30 January 2018) applies to the area as indicated on the scheme maps and corresponds with the Townlands Diagram for Windhoek Town and Townlands.

The general purpose of this Scheme is the coordinated and harmonious development of the area of Windhoek (including, where necessary, the reconstruction and redevelopment of any part which has already been subdivided whether there are buildings on it or not) in such a way as will most effectively tend to promote health, safety, order, amenity, convenience and general welfare as well as efficiency and economy in the process of development and improvement of communications, and where it is expedient in order to promote proper planning or development, may provide for the suspending the operation of any provision of law or any bylaw or regulation made under such law, in so far as such provision is similar to or inconsistent with any of the provisions so the Scheme.

The Remainder of Portion 87 is zoned 'industrial' with a bulk of 0.1. The operation of an abattoir is allowed under the zoning 'industrial' with the consent of Windhoek City Council. City of Windhoek issued a Certificate of Fitness / Registration for the abattoir (Indraai Abattoir) to carry on with the business of an abattoir.

CONCLUSION AND IMPACT

The proposed project has been considered under the stipulations of the Windhoek Town Planning Scheme and the Local Authorities Act. The project is in line with City of Windhoek's Town Planning Scheme and will not have a negative impact on the surrounding environment. The abattoir operates under a valid Certificate of Fitness issued by City of Windhoek.

OTHER LAWS, ACTS, REGULATIONS AND POLICIES

The laws, acts, regulations, and policies listed below have also been considered during the Environmental Assessment.

Table 1: Laws. Acts, Regulations and Policies

Laws, Acts, Regulations & Policies consulted:		
Electricity Act	In accordance with the Electricity	The Proponent must abide to
(No. 4 of 2007)	Act (No. 4 of 2007) which provides	the Electricity Act.
	for the establishment of the	
	Electricity Control Board and	
	provide for its powers and	
	functions; to provide for the	
	requirements and conditions for	
	obtaining licenses for the provision	
	of electricity; to provide for the	
	powers and obligations of licenses;	

	and to provide for incidental	
	matters: the necessary permits and	
	licenses will be obtained.	
Local	The purpose of the Local	COW considered and
Authorities	Authorities Act is to provide for the	approved the subdivision of
Act (No. 23 of	determination, for purposes of local	the portion as per the
1992)	government, of local authority	stipulations of the Local
	councils; the establishment of such	Authorities Act.
	local authority councils; and to	
	define the powers, duties and	
	functions of local authority councils;	
	and to provide for incidental matters.	
Pollution	The Pollution Control and Waste	The Proponent must adhere to
Control and	Management Bill is currently in	the Pollution Control and
Waste	preparation and is therefore	Waste Management Bill.
Management	included as a guideline only. Of	
Bill (guideline	reference to the mining, Parts 2, 7	
only)	and 8 apply. Part 2 provides that	
J,)	no person shall discharge or cause	
	to be discharged, any pollutant to	
	the air from a process except	
	under and in accordance with the	
	provisions of an air pollution	
	license issued under section 23.	
	Part 2 also further provides for	
	•	
	•	
	license application, fees to be paid	
	and required terms of conditions	
	for air pollution licenses. Part 7	
	states that any person who sells,	
	stores, transports or uses any	
	hazardous substances or products	
	containing hazardous substances	
	shall notify the competent	
	authority, in accordance with sub-	
	section (2), of the presence and	
	quantity of those substances. The	
	competent authority for the	
	purposes of section 74 shall	
	maintain a register of substances	
	notified in accordance with that	
	section and the register shall be	
	maintained in accordance with the	
	provisions. Part 8 provides for	
	emergency preparedness by the	
	person handling hazardous	
	substances, through emergency	
	response plans.	

Water Resources Management Act	The Water Resources Management Act (No. 11 of 2013) stipulates conditions that ensure effluent that is produced to be of a certain standard. There should also be controls on the disposal of sewage, the purification of effluent, measures should be taken to ensure the prevention of surface and groundwater pollution and water resources should be used in a sustainable manner.	The Act must be consulted. Fresh water abstraction and waste-water discharge permits should be obtained when required.
Solid and Hazardous Waste Management Regulations: Local Authorities 1992	Provides for management and handling of industrial, business and domestic waste.	The Proponent must abide to the solid waste management provisions.
Hazardous Substances Ordinance (No. 14 of 1974)	The Ordinance applies to the manufacture, sale, use, disposal and dumping of hazardous substances, as well as their import and export and is administered by the Minister of Health and Social Welfare. Its primary purpose is to prevent hazardous substances from causing injury, ill-health or the death of human beings.	The Proponent must abide to the Ordinance's provisions.
Atmospheric Pollution Prevention Ordinance of Namibia (No. 11 of 1976)	Part 2 of the Ordinance governs the control of noxious or offensive gases. The Ordinance prohibits anyone from carrying on a scheduled process without a registration certificate in a controlled area. The registration certificate must be issued if it can be demonstrated that the best practical means are being adopted for preventing or reducing the escape into the atmosphere of noxious or offensive gases produced by the scheduled process.	The proponent should adhere to the stipulations of the Atmospheric Pollution Prevention Ordinance.
Nature Conservation Ordinance	The Nature Conservation Ordinance (No. 4 of 1975) covers game parks and nature reserves,	The proposed project implementation is not located in a demarcated conservation

	the hunting and protection of wild	area, national park or unique
	animals, problem animals, fish and	environments.
	indigenous plant species. The	
	Ministry of Environment, Forestry	
	and Tourism (MEFT) administer it and provides for the establishment	
	of the Nature Conservation Board.	
Forestry Act	The Forestry Act (No. 12 of 2001)	No removal of protected tree
,	specifies that there be a general	species or removal of mature
	protection of the receiving and	trees should happen. The
	surrounding environment. The	Ministry of Environment,
	protection of natural vegetation is	Forestry and Tourism should
	of great importance, the Forestry	be consulted when required.
	Act especially stipulates that no living tree, bush, shrub or	
	indigenous plants within 100m from	
	any river, stream or watercourse,	
	may be removed without the	
	necessary license.	
EU Timber	Forest Stewardship Council (FSC)	The Proponent is advised to
Regulation:	came into effect in March 2013,	adhere to the regulation.
FSC (2013)	with the aim of preventing sales of illegal timber and timber products	
	in the EU market. Now, any actor	
	who places timber or timber	
	products on the market for the first	
	time must ensure that the timber	
	used has been legally harvested	
	and, where applicable, exported legally from the country of harvest.	
Labour Act	The Labour Act (No. 11 of 2007)	The proponent and contractor
Labour Aot	contains regulations relating to the	
	Health, Safety and Welfare of	
	employees at work. These	
	regulations are prescribed for	
	among others safety relating to	
	hazardous substances, exposure limits and physical hazards.	
	Regulations relating to the Health	
	and Safety of Employees at Work	
	are promulgated in terms of the	
	Labour Act 6 of 1992 (GN156,	
	GG1617 of 1 August 1997).	
Communal	Communal land is land that belongs to the State and is held in	Consent should be obtained from Traditional Authorities,
Land Rights	trust for the benefit of the	Communal Boards, Chiefs,
	traditional communities living in	Kings, Queens etc. if required.
	those areas. Communal land	

	cannot be bought or sold, but one	
	can be given a customary land	
	right or right of leasehold to a part	
	of communal land in accordance	
	with the provisions of the	
	Communal Land Reform Act	
	(No. 5 of 2002) and Communal	
	Land Reform Amendment Act	
	(No. 13 of 2013). The Communal	
	Land Reform Act provide for the	
	allocation of rights in respect of	
	communal land to establish	
	Communal Land Boards to provide	
	for the powers of Chiefs and	
	Traditional Authorities and boards	
	in relation to communal land and to	
	make provision for incidental	
	matters. Consent and access to	
	land for the proposed project	
	should be requested from the	
	relevant traditional authority	
	through the Regional Council and	
	Regional Communal Land Boards.	
Traditional	The Traditional Authorities Act	Traditional Authorities should
Authorities	(No. 17 of 1995) provide for the	be consulted when required.
Act (No. 17 of	establishment of traditional	
1995)	authorities, the designation and	
	recognition of traditional leaders; to	
	define their functions, duties and	
	powers; and to provide for matters incidental thereto.	
Public and	The Public and Environmental	The proponent and contractor
Environmental	Health Act (No. 1 of 2015) provides	should adhere to the Public
Health Act	with respect to matters of public	and Environmental Health Act.
710010117100	health in Namibia. The objects of	
	this Act are to: (a) promote public	
	health and wellbeing; (b) prevent	
	injuries, diseases and disabilities;	
	(c) protect individuals and	
	communities from public health	
	risks; (d) encourage community	
	participation in order to create a	
	healthy environment; and (e)	
	provide for early detection of	
	diseases and public health risks.	
National	All protected heritage resources	The National Heritage Council
Heritage Act	discovered need to be reported	should be consulted when
(No. 27 of	immediately to the National	required.

2004)	Heritage Council (NHC) and	
2004)	require a permit from the NHC	
	before it may be relocated. This	
	should be applied from the NHC.	
National	No person shall destroy, damage,	The proposed site for
Monuments	excavate, alter, remove from its	development is not within any
Act of	original site or export from	known monument site both
Namibia (No. 28 of 1969) as	Namibia: (a) any meteorite or fossil; or	movable or immovable as specified in the Act, however
amended until	(b) any drawing or painting on	in such an instance that any
1979	stone or a petroglyph known or	material or sites or archeologic
	commonly believed to have been	importance are identified, it
	executed by any people who	will be the responsibility of the
	inhabited or visited Namibia before	developer to take the required
	the year 1900 AD; or	route and notify the relevant
	(c) any implement, ornament or	commission.
	structure known or commonly believed to have been used as a	
	mace, used or erected by people	
	referred to in paragraph; or	
	(d) the anthropological or	
	archaeological contents of graves,	
	caves, rock shelters, middens,	
	shell mounds or other sites used	
	by such people; or	
	(e) any other archaeological or	
	palaeontological finds, material or	
	object; except under the authority of and in accordance with a permit	
	issued under this section.	
Public Health	Under this act, in section 119: "No	The proponent will ensure that
Act (No. 36 of	person shall cause a nuisance or	all legal requirements of the
1919)	shall suffer to exist on any land or	project in relation to protection
	premises owned or occupied by	of the health of their
	him or of which he is in charge any	employees and surrounding
	nuisance or other condition liable	residents is protected and will
	to be injurious or dangerous to health."	be included in the EMP.
	nealui.	Relevant protective equipment shall be provided for
		employees in construction.
		The development shall follow
		requirements and
		specifications in relation to
		water supply and sewerage
		handling and solid waste
		management so as not to
		threaten public health of future residents on this piece of land.
		residents on this piece of land.

Soil	The objectives of this Act are to:	Only the area required for the			
Conservation	Make provisions for the combating	operations should be cleared			
Act (No. 76 of	and prevention of soil erosion;				
1969)	Promote the conservation,	minimum impact on the soil			
,	protection and improvement of the	through clearance for			
	soil, vegetation, sources and	construction.			
	resources of the Republic;				
Air Quality Act	The Air Quality Act (No. 39 of	The proponent and contractor			
(N0. 39 of	2004) intends to provide for	should adhere to the Air			
2004)	national norms and standards	Quality Act.			
2007)	regulating air quality monitoring,	Quality Act.			
	management and control by all				
	•				
	spheres of government; for specific				
	air quality measures; and for				
	matters incidental thereto.				
Vision 2030	Namibia's overall development				
and National	ambitions are articulated in the	important element in			
Development	Nation's Vision 2030. At the	employment creation.			
Plans	operational level, five-yearly				
	national development plans				
	(NDP's) are prepared in extensive				
	consultations led by the National				
	Planning Commission in the Office				
	of the President. Currently the				
	Government has so far launched a				
	4th NDP which pursues three				
	overarching goals for the Namibian				
	nation: high and sustained				
	economic growth; increased				
	income equality; and employment				
	creation.				

CONCLUSION AND IMPACT

It is believed the above administrative, legal and policy requirements which specifically guide and governs development will be followed and complied with in the planning, implementation and operations of the activity.

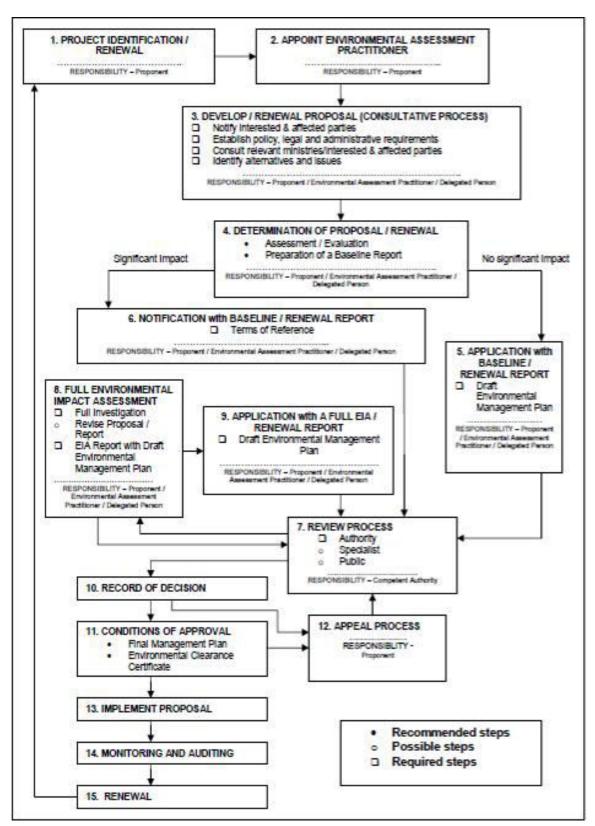


Figure 12: Flowchart of the Impact Process

11. AFFECTED RECEIVING ENVIRONMENT

11.1. BIODIVERSITY AND VEGETATION

Portion 87 (a portion of Portion H) of the Farm Brakwater No. 48 forms part of the Tree and Shrub Savannah Biome (specifically the Highland Savannah). The project site is showing evidence of some human interference namely informal tracks are present and vegetation was cleared on some areas of the site and a few gravel roads are present on the site.

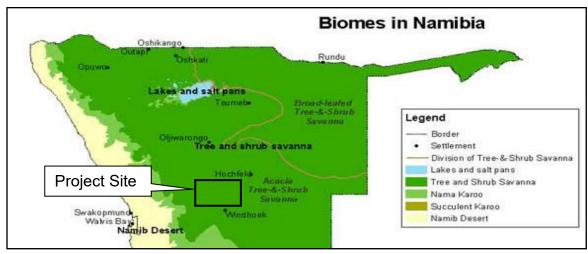


Figure 13: Biomes in Namibia (Atlas of Namibia, 2002)

Only the necessary plants/vegetation will be removed for the construction phase. The natural characteristics of the project site namely the vegetation clearance and the destruction of habitats is expected to further on have a low impact on the environment before the mitigation measures are taken and after the mitigation measures are taken, the impact will be very low.

11.2. GEOLOGY AND SOILS

Portion 87 (a portion of Portion H) of the Farm Brakwater No. 48 is located in the Khomas Trough on a geological area classified as Damara Supergroup and Gariep Complex. The surface geology of the area also consists of formations of Damara granite intrusions. See *Map* below:

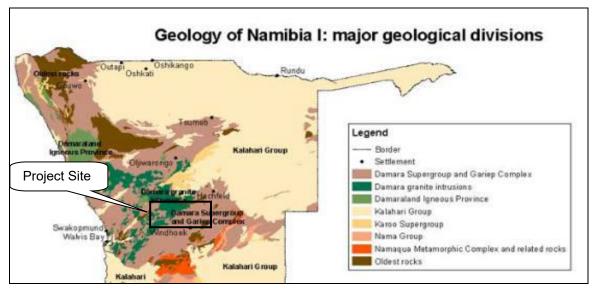


Figure 14: Geology of Namibia (Atlas of Namibia Project, 2002)

The Khomas Trough was formed during sedimentation of the Late Proterozoic Damara Sequence. The basin that was filled by a thick sequence, now preserved as metagreywackes and pelites of the Kuiseb Formation, which were subsequently multiply deformed and thrusted during the Damaran Orogeny. Minor lithologies included are graphite schists, calc-silicates and scapolite schists (*Grunert*, 2003).

The project site is generally even with some higher areas at places. Natural slopes are seen near natural drainage courses on the project site. The soil is suitable for development however the soil is also erodible and should not be cleared unnecessarily from vegetation if not required for the placement of buildings or roads. Unnecessary clearing of soil will lead to erosion (*Grunert, 2003*).

11.3. SOCIO ECONOMIC ENVIRONMENT

The Project Site is mainly surrounded by business buildings, industrial activities and some residential uses. The proposed/current utilisation will have a positive impact on the socio-economic environment because of additional employment and the supply of portions of land. The operations will be conducted with little disturbance to the environment and towards the individuals that are residing or working in the area.

11.4. CLIMATE

No specific climate data is available for the project site. Windhoek and surroundings in general are characterized with a semi-arid highland savannah climate typified as very hot in summer and moderate dry in winter. The highest temperatures are measured in December with an average daily temperature of maximum 31°C and a minimum of 18°C. The coldest temperatures, conversely, are measured in July with an average daily maximum of 20°C and minimum 3°C (*Weather - the Climate in Namibia*, 1998 – 2012). The area therefore has low frost potential.

Rainfall in the form of thunderstorms is experienced in the area during the summer months between October and April. The annual average rainfall for the area is 350mm to 400mm however the average evaporation rate is 3 400mm a year (*Weather - the Climate in Namibia*, 1998 – 2012). Over 70% of the rainfall occurs in the summer months' period between November and March. Rainfall in the area is typically sporadic and unpredictable however the average highest rainfall months are January to March.

Wind is expected to prevent the spread of any nuisance namely noise and smell. The predominant wind in the region is easterly with westerly winds from September to December (*Weather - the Climate in Namibia*, 1998 – 2012). Extreme winds are experienced in the months of August and September and thus significant wind erosion on disturbed areas is visible.

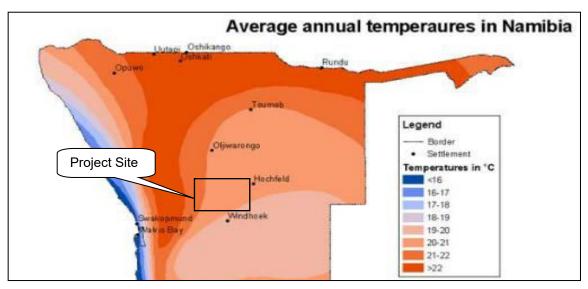


Figure 15: Average temperatures (Atlas of Namibia Project, 2002)

11.5. CULTURAL HERITAGE

The proposed project site is not known to have any historical significance prior to or after Independence in 1990. The specific area does not have any National Monuments and the specific site has no record of any cultural or historical importance or on-site resemblance of any nature. No graveyard or related article was found on the site.

12. IMPACT ASSESSMENT AND EVALUATION

The Environmental Impact Assessment sets out potential positive and negative environmental impacts associated with the proposed project site. The following assessment methodology will be used to examine each impact identified:

Table 1: Impact Evaluation Criterion (DEAT 2006)

Criteria	Rating (Severity)			
Impact Type	+	Positive		
	0	No Impact		
	-	Negative		
Significance of impact being either	L	Low (Little or no impact)		
·	М	Medium (Manageable impacts)		
	н	High (Adverse impact)		

Probability:	Duration:
5 – Definite/don't know	5 - Permanent
4 – Highly probable	4 – Long-term (impact ceases)
3 – Medium probability	3 – Medium term (5 – 15 years)
2 – Low probability	2 – Short-term (0 – 5 years)
1 – Improbable	1 - Immediate
0 - None	
Scale:	Magnitude:
5 – International	10 – Very high/don't know
4 – National	8 - High
3 – Regional	6 - Moderate
2 – Local	4 - Low
1 – Site only	2 - Minor
	0 - None

The impacts on the receiving environment are discussed in the paragraphs below:

12.1. IMPACTS DURING THE OPERATIONAL PHASE

12.1.1. ECOLOGICAL IMPACTS

Staff and visitors should only make use of walkways and existing roads to minimise the impact on vegetation. No firewood may be collected on the site. Minimise the area of

disturbance by restricting movement to the designated working areas during maintenance and drives.

Impact Evaluation

Aspect	Impact Type	Scale	Duration	Magnitude	Probability	Significa	ance
	,,,,					Unmitigated	Mitigated
Ecology Impacts	-	1	2	4	2	L	L

12.1.2. DUST POLLUTION AND AIR QUALITY

Vehicles transporting goods and staff will contribute to the release of hydrocarbon vapours, carbon monoxide and sulphur oxides into the air. Possible release of sewer odour, due to sewer system failure of maintenance might also occur. All maintenance of bulk services and infrastructure at the project site has to be designed to enable environmental protection.

Impact Evaluation

Aspect	Impact Type	Scale	Duration	Magnitude	Probability	Significance	
	, , , , , , , , , , , , , , , , , , ,					Unmitigated	Mitigated
Dust & Air Quality	-	2	2	4	4	М	L

12.1.3. CONTAMINATION OF GROUNDWATER

Spillages might also occur during maintenance of the sewer system. This could have impacts on groundwater especially in cases of large sewer spills. Proper containment should be used in cases of sewerage system maintenance to avoid any possible leakages. Oil and chemical spillages may have a heath impact on groundwater users. Potential impact on the natural environment from possible polluted groundwater also exits.

Impact Evaluation

Aspect	Impact Type	Scale	Duration	Magnitude	Probability	Significance	
						Unmitigated	Mitigated
Groundwater contamination	-	2	2	4	2	L	L

12.1.4. GENERATION OF WASTE

Household waste from the activities at the site and from the staff working at the site will be generated. This waste will be collected, sorted to be recycled and stored in on site for transportation and disposal at an approved landfill site.

Impact Evaluation

Aspect	Impact Type	Scale	Duration	Magnitude	Probability	Significa	ance
	,,					Unmitigated	Mitigated
Waste Generation	-	1	2	2	2	М	L

12.1.5. FAILURE IN RETICULATION PIPELINES

There may be a potential release of sewage, stormwater or water into the environment due to pipeline/system failure. As a result, the spillage could be released into the environment and could potentially be health hazard to surface and groundwater. Proper reticulation pipelines and drainage systems should be installed. Regular bulk services infrastructure and system inspection should be conducted.

Impact Evaluation

Aspect	Impact Type	Scale	Duration	Magnitude	Probability	Signific	ance
						Unmitigated	Mitigated
Failure of Reticulation Pipeline	-	1	1	4	2	М	L

12.1.6. FIRES AND EXPLOSIONS

Food will be prepared on gas fired stoves. There should be sufficient water available for firefighting purposes. Ensure that all fire-fighting devices are in good working order and are serviced. All personnel have to be trained about responsible fire protection measures and good housekeeping such as the removal of flammable materials on site. Regular inspections should be carried out to inspect and test firefighting equipment by the contractor.

Impact Evaluation

Aspect	Impact Type	Scale	Duration	Magnitude	Probability	Signific	ance
						Unmitigated	Mitigated
Fires and Explosions	-	2	1	4	2	М	L

12.1.7. HEALTH, SAFETY AND SECURITY

The safety, security and health of the labour force, employees and neighbours are of great importance, workers should be orientated with the maintenance of safety and health procedures and they should be provided with PPE (Personal Protective Equipment). Workers should be warned not to approach or chase any wild animals occurring on the site. No open flames, smoking or any potential sources of ignition should be allowed at the project location. Signs such as 'NO SMOKING' must be prominently displayed in parts where inflammable materials are stored on the premises.

Impact Evaluation

Aspect	Impact Type	Scale	Duration	Magnitude	Probability	Signific	ance
	,,					Unmitigated	Mitigated
Safety & Security	-	1	2	4	2	М	L

12.2. CUMULATIVE IMPACTS

These are impacts on the environment, which results from the incremental impacts of the construction and operation of the proposed project when added to other past, present, and reasonably foreseeable future actions regardless of what person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. In relation to an activity, it means the impact of an activity that in it may not become significant when added to the existing and potential impacts resulting from similar of diverse activities or undertakings in the area.

Possible cumulative impacts associated with the proposed project include sewer damages/maintenance, vegetation and animal disturbance, uncontrolled traffic and destruction of the natural environment. These impacts could become significant especially if it is not properly supervised and controlled. This could collectively impact on the environmental conditions in the area. Cumulative impacts could occur in both the operational and the construction phase.

Impact Evaluation

Aspect	Impact Type	Scale	Duration	Magnitude	Probability	Significance	
	, , , , , , , , , , , , , , , , , , ,					Unmitigated	Mitigated
Cumulative Impacts	-	1	3	4	3	L	L

13. ENVIRONMENTAL MANAGEMENT PLAN

The Environmental Management Plan (EMP) provides management options to ensure impacts of the proposed construction are minimised. An EMP is an environmental management tool used to ensure that undue or reasonably avoidable adverse impacts of the operations are prevented, and the positive benefits of the projects are enhanced.

The objectives of the EMP are:

- ✓ to include all components of the proposed project.
- ✓ to prescribe the best practicable control methods to lessen the environmental impacts associated with the project.
- ✓ to monitor and audit the performance of the project personnel in applying such controls
- ✓ to ensure that appropriate environmental training is provided to responsible project personnel.

The EMP acts as a document that can be used during the various phases of the proposed project. The contractor as well as the management and staff should be made aware of the contents of the EMP. See Appendix for EMP.

14. CONCLUSION

The EIA has been completed in line with the requirements of the Environmental Management Act, 2007 and Regulations and it is concluded and recommended that the site identified namely Portion 87 of the Farm Brakwater No. 48, has the full potential to be used for the proposed activities. The identified environmental and social impacts can be minimized and managed through implementing preventative measures and sound management systems. It is recommended that the environmental performance be monitored regularly to ensure compliance and that corrective measures be taken if necessary.

In general, the operation of the proposed project would pose limited environmental risks, provided that the EMP for the activity is used properly. The EMP should be used as an onsite tool during the operation of the project. Parties responsible for non-conformances of the EMP should be held responsible for any rehabilitation that has to be undertaken. After assessing all information available on this project, Green Earth Environmental Consultants are of the opinion that the proposed project site is suitable for the proposed activities. The accompanying EMP will focus on mitigation measures that will remediate or eradicate the negative or adverse impacts.

15. RECOMMENDATION

It is therefore recommended that the Ministry of Environment, Forestry and Tourism through the Environmental Commissioner support and approve the Environmental Clearance for the Indraai Abattoir which is located on the Remainder of Portion 87 of the

Farm Brakwater No. 48, Windhoek, Khomas Region and to issue an Environmental Clearance for the following 'Listed Activities':

WASTE MANAGEMENT, TREATMENT, HANDLING AND DISPOSAL ACTIVITIES

- 2.1 The construction of facilities for waste sites, treatment of waste and disposal of waste
- 2.2 Any activity entailing a scheduled process referred to in the Atmospheric Pollution Prevention Ordinance, 1976.
- 2.3 The import, processing, use and recycling, temporary storage, transit or export of waste.

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APPENDIX A: NEWSPAPER NOTICES







CLASSIFIEDS

(061) 208 0800/44

(061) 220 584

classifieds@nepc.com.na



ck. COMMENTS

Management Act (No. 7 of 2007)
Ichael Sort Street, Windhoek, John Sort Street, Windhoe

Give your business the best boost you can! Advertise in our weekly motoring supplement WOEMA!

Be it any accessories or gadgets for your vehicle.

Call us on 061 2080800 or fax us on 220584 Put the WOEMA back into your business!

Notice

Notice

Subdivision of Portion 23 of the Farm Finkensetian No. 25 of Chapestan No. 25 of Farm Finkensetian No. 25



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REGULATION 93, 42 84, 331

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COMMENTS ENVIRONMENTAL IMPACT ASSESSMENT AND ENVI-RONMENTAL MANAGEMENT PLAN TO OBTAIN AN ENVIRONMENTAL CLEARANCE FOR THE OPERATION
OF AN ABATTOIR / SLAUGHTERHOUSE ON THE REMAINDER OF
PORTION 87 OF FARM BRAKWA-TER NO. 48, WINDHOEK, KHOMAS REGION Green Earth Environme Consultants have been appointed to attend to and complete an Environ-mental Impact Assessment and Environmental Management Plan (EMP) to obtain an Environmental Clearance Certificate as per the requirements of the Environmental Management Act (No. 7 of 2007) and the Environmental Impact Assessment Regulations (GN 30 in GG 4878 of 6 February 2012) for the Indraal Abattoir which is located on the Remainder of Portion 87 of the Farm Brakwater No. 48, Windhoek

Name of proponent: BV Investments

Project location and description Indraai Abattoir is located on the Re-mainder of Portion 87 of Farm Brakwater No. 48. The Remainder of Portion 87 is in 3,4728ha extent and zoned 'industrial' with a bulk of 0.1. The Abattoir has been in operation for more than 25 years. An average of 10 sheep and 50 cattle are slaughtered per week. The abattoir's solid waste, blood and process effluent is temporarily stored on the site in conservancy tanks and a skip. This, waste, blood and effluent, are collected on a reqular basis by the City of Windhoek for disposal at their approved landfill site. To obtain compliance to allow the con-tinued operation of the abattoir, City of Windhoek's consent, as per the stip ulations of the Windhoek Town Plan ning Scheme, to operate a 'noxious industry' on the Remainder of Portion 87 of Farm Brakwater No. 48 must be obtained. The consent for a noxious industry is subject to obtaining an environmental clearance for the abattoir. Interested and affected parties are hereby invited to register in terms of the assessment process to give input, comments, and opinions regarding the proposed project. A public meeting will be held if enough public intertest is shown. Registered I & APs will be notified of the date and venue of the public meeting.
The last date for comments and/or reg-

stration is 4 July 2025.

Contact details for registration and further information: Green Earth Environmental Consultants Contact Persons Charlie Du Toit/Carien van der Walt Tel: 0811273145

E-mail: carien@greenearthnamibia.com CLAO250001579



CALL FOR PUBLIC PARTICIPATION/COMMENTS

ENVIRONMENTAL IMPACT
A S S E S S M E N T A N D
ENVIRONMENTAL MANAGEMENT
PLAN TO OBTAIN AN OBTAIN
PLAN TO OBTAIN AN OBTAIN
ENVIRONMENTAL CLEAN AN OBTAIN
FOR THE OPERATION OF NA
BARTORI S LAUGHTERHOUSE
ON THE REMAINDER OF PORTION
S TO FF FARM BRAKWATER NO. 48,
WINDHOEK, KHOMAS REGION

Green Earth Environmental Green Earth Environmental Consultants have been appointed to attend to and complete an Environmental Impact Assessment and Environmental Management Plan (EMP) to obtain an Environmental Clearance Certificate as per the requirements of the Environmental Impact and Environmental Impact and Environmental Impact (SASSESSMENT Regulations (GM 30 in GG 4878 of 6 February 2012) for the indraal Abation which is located on the Remainder of Portion 87 of the Earm Brakwater No. 48, Windhoek, Khomas Region.

Name of proponent: BY Investments Twenty-Six CC

BV Investments Twenty-Six CC

Project location and description:
Indralal Abattoir is located on the
Remainder of Forthon 87 of Farm
Brakwater No. 48. The Remainder
of Portion 87 is in 34-728ha extent
and zoned 'industrial' with a bulk
of 0.1. The Abattoir has been in
operation for more than 25 years.
An average of 10 sheep and 50
cattle are slaughtered per week.
The abattoir's solid waste, blood and
process effluent is temporarily stored
on the site in conservancy tanks
and a skip. This, waste, blood and
effluent, are collected on a regular
basis by the City of Windhoek for
disposal at their approved landfill
site. To obtain compliance to allow the
continued operation of the abattoir,
City of Windhoek's consent, as per
the stipulations of the Windhoek
Town Planning Scheme, to operate a
'noxious industry on the Remainder
of Portion 87 of Farm Brakwater No.
48 must be obtained. The consent
for a noxious industry is subject
to obtaining an environmental
clearance for the abattoir.

regarding the proposed project.
A public meeting will be held if enough public intertest is shown. Registered I & APs will be notified of the date and venue of the public meeting.

The last date for comments and/or registration is 4 July 2025.
Contact details for registration and further information: further information: Green Earth Environmental Consultants Contact Persons: Charlie Du Toit/Carien van der Walt

arlie Du 1017-03 0811273145 nail: carien@greenearthnamibia.

Green Earth

CALLFORPUBLIC PARTICIPATION/

ENVIRONMENTAL IMPACT A S S E S S M E N T A N D ENVIRONMENTAL MANAGEMENT PLAN TO OBTAIN AN ENVIRONMENTAL CLEARANCE FOR THE OPERATION OF AN ABATTOR ? SLAUGHTEHOUSE ON THE REMAINDER OF PORTION OF 7 OF FARM BRAKWATER NO. 48, WINDHOEK, KHOMAS REGION

Green Earth Environmental Consultants have been appointed to attend to and compilete an Environmental Impact Assessment and Environmental Impact Assessment and Environmental Impact Assessment and Environmental Clearance Certificate as per the requirements of the Environmental Clearance Certificate as per the requirements of the Environmental Impact and the Environmental Impact Assessment Regulations (QN 30 in GG 4878 of 6 February 2012) for the indiraal Abartior which is located on the Remainder of Portion 87 of the Farm Brakwafer No. 48, Windhoek, Khomas Region.

Name of proponent: BV Investments Twenty-Six CC

Project location and description: Indraal Abattori is located on the Remainder of Portion 87 of Farm Brakwater No. 48. The Remainder of Portion 87 of Farm Brakwater No. 48. The Remainder of Portion 87 is in 3-4725th extent and zoned industrial with a buik of 0.1. The Abattori has been in operation for more than 25 years. An average of 10 sheep and 50 cattle are slaughtered per week. The abattori's solid waste, blood and processeffluent is temporarily stored on the site in conservancy tanks and a skip. This, waste, blood and processeffluent is temporarily stored on the site in conservancy tanks and a skip. This, waste, blood and processeffluent is temporarily stored the following that is the store of the site of the store of the store of the store of the store of the shattor. City of Windhoek's consent, as per the stipulations of the Windhoek consent of the abattor. Project location and description:

Interested and affected parties are hereby invited to register in terms of the assessment process to give input, comments, and opinions regarding the proposed project. A public meeting will be held if enough public intertest is shown Registered if & APs will be notified of the date and venue of the public meeting.

The last date for comments and/or registration is 4 July 2025. Contact details for registration and Green Earth Environmental Consultants. Charlie Du Tolt/Carien van der Walt Tel: 0811273145 E mail: carien®greenearthnamibla.com

CALL FOR PUBLIC PARTICIPATION/ COMMENTS ENVIRONMENTAL IMPACT ASSESSMENT AND ENVI-RONMENTAL MANAGEMENT PLAN TO OBTAIN AN ENVIRONMENTAL CLEARANCE FOR THE OPERATION OF AN ABATTOIR / SLAUGHTER-HOUSE ON THE REMAINDER OF PORTION 87 OF FARM BRAKWA-TER NO. 48, WINDHOEK, KHOMAS REGION Green Earth Environmenta Consultants have been appointed to attend to and complete an Environmental Impact Assessment and En-vironmental Management Plan (EMP) to obtain an Environmental Clearance Certificate as per the requirements of the Environmental Management Act (No. 7 of 2007) and the Environmental Impact Assessment Regulations (GN 30 in GG 4878 of 6 February 2012) for the Indraai Abattoir which is located on the Remainder of Portion 87 of the Farm Brakwater No. 48, Windhoek, Khomas Region.

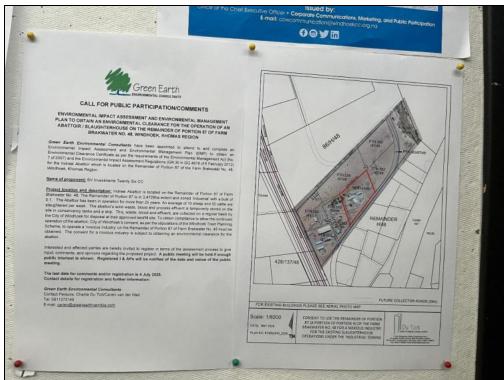
Name of proponent: BV Investments wenty Six CC

Project location and description: Indraai Abattoir is located on the Re-mainder of Portion 87 of Farm Brakwater No. 48. The Remainder of Portion 87 is in 3,4728ha extent and zoned 'industrial' with a bulk of 0.1. The Abattoir has been in operation for more than 25 years. An average of 10 sheep and 50 cattle are slaughtered per week. The abattoir's solid waste, blood and process effluent is temporarily stored on the site in conservancy tanks and a skip. This, waste, blood and effluent, are collected on a regular basis by the City of Windhoek for disposal at their approved landfill site. To obtain compliance to allow the continued operation of the abattoir, City of Windhoek's consent, as per the stipulations of the Windhoek Town Planning Scheme, to operate a 'noxious industry' on the Remainder of Portion 87 of Farm Brakwater No. 48 must be obtained. The consent for a noxious industry is subject to obtaining an environmental clearance for the abattoir. Interested and affected parties are hereby invited to register in terms of the assessment process to give input, comments, and opinions regarding the proposed project. A public meeting will be held if enough public intertest is shown. Registered I & APs will be notified of the date and venue of the public meeting. The last date for comments and/or registration is 4 July 2025. Contact details for registration and further information: Green Earth Environmental Consultants Contact Persons: Charlie Du Toit/Carien van der Walt Tel: 0811273145

E-mail: carien@greenearthnamibia.com CLAO250001579

APPENDIX B: NOTICE ON CITY OF WINDHOEK NOTICE BOARD





APPENDIX C: LIST OF INTERESTED AND AFFECTED PARTIES

Interested and Affected Parties									
'indraa@iway.na' Elna Steyn Neighbour									
'eggs@waldschmidteggs.com'	'eggs@waldschmidteggs.com' Eckard Waldschmidt Neighbour								
'julia@urbangreenafrica.net'	Julia L. Bashir	Interested Party							

APPENDIX D: COMMENTS RECEIVED FROM I&APS

COMMENTS

From: Julia Bashir <julia@urbangreenafrica.net>

Sent: Monday, 23 June 2025 12:27 pm To: carien@greenearthnamibia.com

Subject: EIA & EMP for Abattoir/slaughterhouse on Rem. Ptn 87, Farm

Brakwater No. 48

Dear sir/madam,

The above-mentioned subject refers.

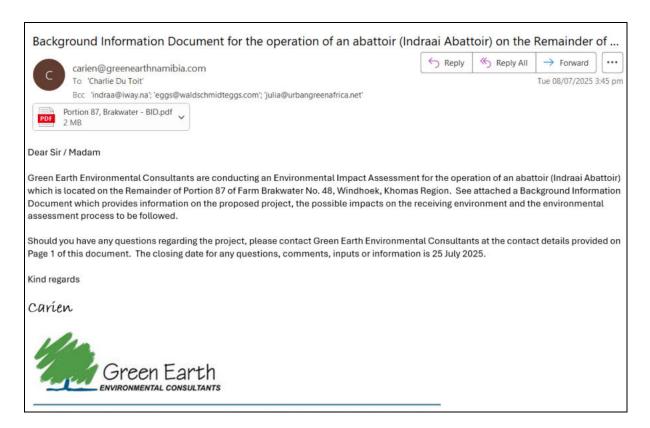
As per your notice placed in the printed media of Friday 20/06/2025, and on behalf of Brakwater & Emmarentia (Mix location) community, I hereby request to be registered as an I&AP.

Kindly send me the BID. Thank you.

Kind regards

Julia L. Bashir

APPENDIX E: BID SENT TO I&APS AND NEIGHBOURS



APPENDIX F: CURRICULUM VITAE OF CHARLIE DU TOIT

1. Position: Environmental Practitioner

Name/Surname: Charl du Toit
 Date of Birth: 29 October 1960

4. Nationality: Namibian

5. Education: Name of Institution University of Stellenbosch, South Africa

Degree/Qualification Hons B (B + A) in Business

Administration and Management

Reading

Writing

Date Obtained 1985-1987

Name of Institution University of Stellenbosch, South Africa

Degree/Qualification BSc Agric Hons (Chemistry, Agronomy

and Soil Science)

Date Obtained 1979-1982

Name of Institution Boland Agricultural High School, Paarl,

South Africa

Degree/Qualification Grade 12
Date Obtained 1974-1978

6. Membership of

Professional

Association:

7. Languages:

EAPAN Member (Membership Number: 112)

Speaking

English	G	ood	Good	Good	
Afrikaans	G	ood	Good	Good	
From	To	Employer		Position(s) held	
2009	Present Green Earth		th	Environmental	
		Environmental		Practitioner	
		Consultants			
2005	2008 Elmarie Du Toit		u Toit	Manager	
	Town Planni		ning		
		Consultant	ts		
2003	2005	Pupkewitz		General Manager	
		Megabuild			
1995	2003	Agra Coop	erative	Manager Trade	
		Limited			
	<u>From</u> 2009 2005 2003	Afrikaans G From To 2009 Present 2005 2008	Afrikaans Good From To Employer 2009 Present Green Ear Environme Consultant 2005 2008 Elmarie Do Town Plan Consultant 2003 2005 Pupkewitz Megabuild 1995 2003 Agra Coop	Afrikaans Good Good From To Employer 2009 Present Green Earth Environmental Consultants 2005 2008 Elmarie Du Toit Town Planning Consultants 2003 2005 Pupkewitz Megabuild 1995 2003 Agra Cooperative	

		Namibia	Chief Agricultural
1989	1995	Development	Consultant
		Corporation	
		Ministry of	Agricultural
1985	1988	Agriculture	Researcher

Certification:

I, the undersigned, certify that to the best of my knowledge and belief, this CV correctly describes myself, my qualifications, and my experience. I understand that any wilful misstatement described herein may lead to my disqualification or dismissal, if engaged.

Charl du Toit

APPENDIX G: CURRICULUM VITAE OF CARIEN VAN DER WALT

1. Position: Environmental Consultant

2. Name/Surname: Carien van der Walt

3. Date of Birth: 6 August 1990

4. Nationality: Namibian

5. Education:

Institution	Degree/Diploma	Years
University of Stellenbosch	B.A. (Degree) Environment and	2009 to 2011
	Development	
University of South Africa	B.A. (Honours) Environmental	2012 to 2013
	Management	

6. Membership of Professional Associations:

EAPAN Member (Membership Number: 113)

7. Languages:

Language	Speaking	Reading	Writing
English	Good	Good	Good
Afrikaans	Good	Good	Good

8. Employment Record:

From	То	Employer	Positions Held
07/2013	Present	Green Earth Environmental Consultants	Environmental
			Consultant
06/2012	03/2013	Enviro Management Consultants Namibia	Environmental
			Consultant
12/2011	05/2012	Green Earth Environmental Consultants	Environmental
			Consultant

9. Detailed Tasks Assigned:

Conducting the Environmental Impact Assessment, Environmental Management Plan, Public Participation, Environmental Compliance and Environmental Control Officer

Certification:

I, the ur	nders	signed, certify the	nat to the	best of my k	nowl	edge and be	lief, th	nis C\	√ corre	ectly describe
myself,	my	qualifications,	and my	experience.	. 1	understand	that	any	wilful	misstatemer
describ	ed he	erein may lead	to my disc	qualification o	or dis	missal, if en	gage.			

Carien van der Walt	

APPENDIX H: ENVIRONMENTAL MANAGEMENT PLAN