ENVIRONMENTAL MANAGEMENT PLAN

Subdivision of Farm Divundu Townlands No. 1362 into Portion X and Remainder and Subsequent Rezoning of Portion X from 'Undetermined' to 'Business'

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Divundu Village Council

KAVANGO EAST REGION

APP- 006096

Ekwao Consulting

INFORMATION SHEET		
Project Name	:	SUBDIVISION OF FARM DIVUNDU NO. 1362 INTO PORTION X AND REMAINDER. REZONING OF PORTION X FROM 'UNDETERMINED' TO BUSINESS' WITH A BULK OF 0.1 ,
Type of Report	:	**ENVIRONMENTAL MANAGEMENT PLAN (EMP)**
Project Location	:	DIVUNDU TOWN DIVUNDU KAVANGO EAST REGION
Competent Authority	:	DIVUNDU VILLAGE COUNCIL P O BOX 5266 DIVUNDU TEL:066 259 414 FAX: 066 258 367
ECC Application No.	:	APP-006096
Report Date	:	August 2025
Project Promotor	:	RWARE TRADING ENTERPRISES CC P O BOX 25530 WINDHOEK ATTEN: MR GERVASIUS THIKUSHO Cell: 081 295 4069 Email: rwaretrading@gmail.com
Town Planner	:	DUNAMIS CONSULTING (PTY) LTD BOX 81108 WINDHOEK Cell: 085 551 2173 Email: ndimuhona@dunamisplan.com
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ABBREVIATIONS

BID	-	Background Information Documents
BVC	-	Bukalo Village Council
DVC	-	Divundu Village Council
EC	-	Environmental Clearance
ECC	-	Environmental Clearance Certificate
EIA	-	Environmental Impact Assessment
EIAR	-	Environmental Impact Assessment Regulations
EMA	-	Environmental Management Plan
EMP	-	Environmental Management Plan
IAPs	-	Interested and Affected Parties
MEFT	-	Ministry of Environment, Forestry and Tourism
MURD	-	Ministry of Urban and Rural Development
MWALR	-	Ministry of Water, Agriculture, Fisheries and Land Reform
NamRA	-	Namibia Revenue Agency
NHC	-	National Heritage Council
NSA	-	Namibia Statistics Agency
NSI	-	Namibia Standards Institute
OEC	-	Office of the Environmental Commissioner
PPE	-	Personal Protective Equipment
RA	-	Roads Authority
RTE	-	Rware Trading Enterprises
SHE	-	Safety, Health and Environment
URPB	-	Urban Regional Planning Board

DEFINITIONS

TERM EXPANSION
Assessment The process of collecting, organising, analysing, interpreting and communicating information relevant to decision making
Builder's Waste Means any waste generated during the building, construction, repair, alteration, renovation, excavation or demolition of any road, surface, structure, building or premises, and includes builders rubble, earth, vegetation and rock displaced during such building, construction, repair, alteration, renovation, excavation or demolition.
Business Waste Means any waste generated on any premises used for non-residential purposes, but excluding agricultural properties and small holdings, and does not include general waste, household hazardous waste, garden waste, bulky waste, builder's waste, industrial waste, hazardous waste and health care risk waste.
Council Site Means any waste management, collection, processing, satellite or disposal site operated and/or owned by DVC.
Cumulative Impacts In relation to an activity, means the impact of an activity that in itself may not be significant, but may become significant when added to the existing and potential impacts eventuating from similar or diverse activities or undertakings in the area.
Disposal Means the discharge, depositing, dumping, spilling, leaking, placing of waste on or at any premises or place set aside by the DVC for such purposes, and "dispose" shall have a similar meaning.
Dump Means to dispose of waste in any manner other than a manner permitted by law and includes, without derogating from the generality of the aforegoing, to deposit, discharge, spill or release waste, whether or not the waste is in a container or receptacle, in or at any place whatsoever, whether publicly or privately owned, including but not limited to vacant land, waterways, catchments and sewage and stormwater systems. The act of "littering", which retains its ordinary meaning, is excluded from the definition of "dump".
Environment As defined in the Environmental Assessment Policy and Environmental Management Act - "land, water and air; all organic and inorganic matter and living organisms as well as biological diversity; the interacting natural systems that include components referred to in sub-paragraphs, the human environment insofar as it represents archaeological, aesthetic, cultural, historic, economic, paleontological or social values".
Environmental Clearance Certificate A certificate and associated conditions issued in terms of the Environmental Management Act, authorizing a listed activity to be undertaken.
Environmental Impact A description of the potential effect or consequence of an aspect of the development on a specified component of the biophysical, social or economic environment within a defined time and space.
Environmental Management Plan A working document which contains site project specific plan developed to ensure that environmental management practices to eliminate and control environmental impacts are followed during the developmental phase of that site, project and or facility and would normally consist of construction phase, operational phase and decommissioning phase.
General waste Means any waste generated on or at any premises used – (a) for residential purposes, and includes agricultural properties and small holdings; or (b) as public and/or private facilities and institutions but does not include garden waste (unless specifically determined or authorised by the HNTC subject to any conditions or limitations that maybe imposed), bulky waste, business waste, builder's waste, industrial waste, hazardous waste and health care risk waste;
Hazardous waste

TERM	EXPANSION
	Means - (a) any waste containing, or contaminated by, poison; (b) any corrosive agent; (c) any flammable substance having an open flash-point of less than 90 degrees Celsius; (d) an explosive or radioactive material and substance; (e) any chemical or any other waste that has the potential even in low concentrations to have a significant adverse effect on public health or the environment because of its inherent toxicological, chemical, ignitable, corrosive, carcinogenic, injurious and physical characteristics; (f) any waste consisting of a liquid, sludge or solid substance, resulting from any manufacturing process, industrial treatment or the pre-treatment for disposal purposes of any industrial or mining liquid waste, which in terms of any law, order or directive relating to drainage and plumbing may not be discharged into any drain or sewer; (g) the carcass of a dead animal; and (h) any other waste which may be declared as such by DVC or in terms of any other applicable law
Household hazardous waste	Means any waste, excluding garden or bulky waste, generated as a result of housekeeping, maintenance or repair activities on or at any premises, or accumulated, stored or deposited on such premises, used – (a) for residential purposes, and includes agricultural properties and small holdings; or (b) as public and/or private facilities and institutions. which by reason of its nature, composition, toxicity, type, quality, quantity or volume causes or may cause a nuisance, public health risk or pollution.
Industrial waste	Means any waste generated as a result of business, commerce, trade, wholesale, retail, professional, manufacturing, maintenance, repair, fabricating, processing or dismantling activities, but does not include general waste, garden or bulky waste, builder's waste, business waste, hazardous waste or health care risk waste.
Minerals	Means any substance, whether solid, liquid or gaseous form occurring naturally in, on or under any land and having been formed by or subjected to, a geological process.
Non-compliance	Issues that are in direct non-compliance with the requirements, commitments and/or management measures as approved in the EMP.
Pollution	Means any change in the environment caused by – (a) any waste, substance or matter; or (b) noise, odour, dust or heat, emitted from or caused by any activity, including the storage or treatment of any waste, substance or matter, building and construction, and the provision of any service, whether engaged in by any person or an organ of state if that change has an adverse effect on public health or well-being or on the composition, resilience and productivity of a natural or managed ecosystem (both short term and long term), or on material useful to people, or will have such an adverse effect in the future.
Recovery	Means the process or act of reclaiming or diverting from waste any materials, products or by-products for the purposes of being reused, or collected, processed and used as a raw or other material in the manufacture of a new, recycled or any other product, but excluding the use for purposes of energy generation.
Recyclable waste	Means waste which has been separated from the waste stream, and set aside for purposes of recovery, reuse or recycling.
Recycling	Means the process or act of subjecting used or recovered waste materials, products or by-products to a process or treatment of making them suitable for beneficial use and for other purposes, and includes any process or treatment by which waste materials are transformed into new products or base materials in such a manner that the original waste materials, products or by-products may lose their identity, and which may be used as raw materials for the production of other goods or materials, but excluding the use for purposes of energy generation, and "recycle" shall have a similar meaning.
Recycling Facility	Means a facility which receives any waste, materials, products or by-products for the purposes of recovery, reuse or recycling, and includes a buy-back centre.

TERM EXPANSION
Reduction Means the process or act of reducing the nature, type, quality, quantity, volume or toxicity of any waste generated, and "reduce" shall have a similar meaning.
Refuse container Means any receptacle or other container, including a skip, stipulated or approved by the DVC from time to time, whether supplied by the Council or not, for the storage, depositing and disposal of waste.
Re-use Means the process or act of sorting and separating, at the point of origin, different materials found in any waste in order to promote and facilitate recovery, reuse and recycling of materials and resources, and "separate" shall have a similar meaning.
Separation Means the process or act of sorting and separating, at the point of origin, different materials found in any waste in order to promote and facilitate recovery, reuse and recycling of materials and resources, and "separate" shall have a similar meaning.
Storage Means the temporary storage or containment of any waste for a period of less than 90 days after its generation and prior to its collection for recovery, reuse, recycling, treatment or disposal.
Waste Means any substance or matter whether solid, liquid or any combination thereof, irrespective of whether it or any constituents thereof may have value or other use, and includes – (a) any undesirable, rejected, abandoned or superfluous matter, material, residue of any process or activity, product, by-product; (b) any matter which is deemed useless and unwanted; (c) any matter which has been discarded, abandoned, accumulated or stored for the purposes of discarding, abandoning, processing, recovery, reuse, recycling or extracting a usable product from such matter; or (d) products that may contain or generate a gaseous component
Waste Disposal Site Means any facility or site which receives waste for treatment or disposal, and which is authorised to accept such waste, or if such a facility is an incinerator, subject to the provisions of regulation 20, and any possible registration or other permission as may be required by any other applicable law.
Waste generator Means any person whose activities produce any waste and, if that person is not known the person who is in possession and/or control of that waste.
Waste Management Plan Means a structured document that sets out to record/eliminate/reduce/reuse/recycle the amounts and the types of all waste that is generated in an area or facility.
Waste minimisation Means any activity, process or act involving the prevention, elimination or reduction of the amount, nature, type, quality, quantity, volume or toxicity of waste that is generated, and in the event where waste is generated, the reduction of the amount, nature, type, quality, quantity, volume or toxicity of waste that is disposed of.

1. THE PROJECT OVERVIEW

1.1 INTRODUCTION

This report constitutes an Environmental Management Plan (EMP) prepared to serve as a standalone document to mitigate potential impacts associated with undertaking a listed activity in terms of the Environmental Management Act and EIA regulations.

The EMP is also intended to support an application for an Environmental Clearance Certificate (ECC) submitted to the Office of the Environmental Commissioner (OEC) to permit the undertaking of certain statutory land rezoning procedures, i.e. installation of bulk services in the form of sewerage reticulation system, potable water network, electricity, street lights, street roads, etc.

In the EMP, mitigation measures have been recommended to help manage those impacts as identified in the scoping assessment report.

1.2 THE PROMOTOR

The promotor whose particulars are provided in **Table 1** has been allocated a vacant piece of land by Divundu Village Council (DVC). The land measures about 40 000 m^2 (4 ha) and forms part of the Divundu townland reserve. It has not been formalized yet, i.e. there services are not installed.

The allocation is subject to the developer attending to the statutory steps required to formalize urban land. In this regard, Ekwao Consulting has been appointed to handle the ECC application while Dunamis Consulting have been appointed to attend to the town planning processes.

Table 1: Details of the Promoters

Company Details	
Registered Name	Rware Trading Enterprises CC
Registration Number	CC/2011/2840
Company Representative	Mr Gervasius Thikusho
Designation	Managing Member
Contact Details	Mobile: 081 295 4069 Email: rwaretrading@gmail.com
Physical Address	Divundu Worman Brock Divundu Kavango East Region
Postal Address	Box 25530 WINDHOEK, Namibia

1.3 TOWN PLANNING PROCESS

The town planning is a statutory process regulated under the Urban and Regional Planning Act. It is a coordinated and legal process of planning aimed at determining 'land use and development' hence promoting and ensuring a safe, healthy and efficient living environment for the people. The statutory steps involved for this development are presented in Table 2.

Table 2: The Town Planning Process

1. Subdivision of Farm Divundu Townlands No. 1362 into Portion X and Remainder.
2. Rezoning of Portion X from 'Undetermined' to 'Business' with a Bulk of 1.0
3. Surveying and installation of services (water, sewerage, electricity, street roads, etc.) on the Rezoned Portion X.

1.4 PARTICULARS OF THE LAND

Details of the land portion for which an ECC is required are as presented in **Table 3**, below:

Table 3: Details of the Land

Property Details	
Jurisdiction	Divundu Village Council
Registration Division	'B'
Magisterial District	Rundu
Regional Authority	Kavango East Region
Approximate Size	±40 000 m^2 (±4.0 ha)
Current Zoning	Undetermined
Proposed Zoning	Business
Current Use	Vacant
Services	None
GPS Coordinates	-18.099134 S & 21.546073 E

1.5 PROJECT LOCATION

The land parcel allocated to the promotor is marked Portion X (in blue) as prepared by the town planer and presented in Figure 1. It lies in the middle of the village of Divundu, abutting the B8 trunk road (also known as the Trans Caprivi Highway). The high voltage overhead power line is to the north. The land is partially cleared of vegetation because it was primarily used for crop cultivation.

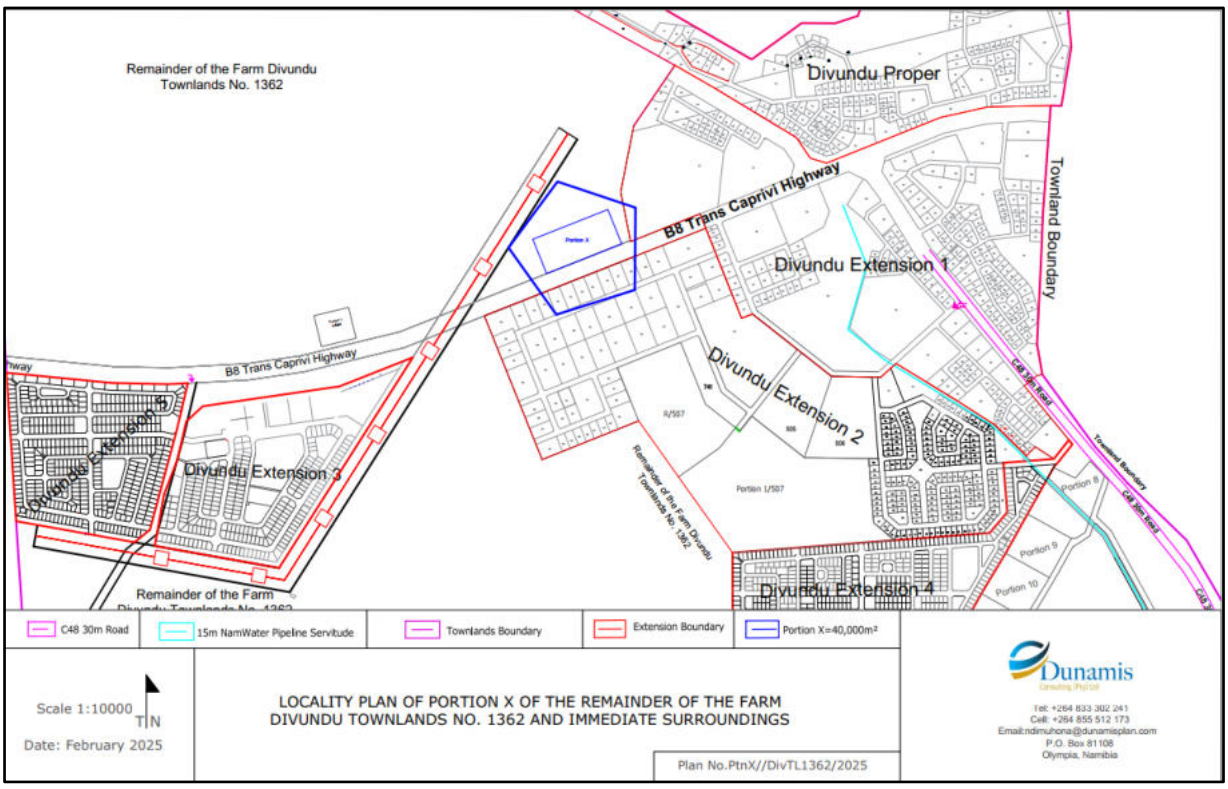

Figure 1: Project Site Location

1.6 TRIGGERED ACTIVITIES

In terms of the EIA Regulations (EIAR), the proposed project has triggered listed activities as tabulated in **Table 4,** below.

Table 4: Triggered Activities

Activity Category	Expansion
Energy Generation, Transmission and Storage Activities	**Paragraph 1(b)** The construction of facilities for the transmission and supply of electricity – in this case the supply of electricity network to the proposed site.
Waste Management, Treatment, Handling and Disposal Activities	**Paragraph 2.3** Temporary storage of waste generated during construction activities for the installation of bulk infrastructure to the proposed development. The operational phase will also require a well-developed waste management to deal with all kinds of waste generated by the operational activities that will be conducted on the formalised land.
Forestry Activities	**Paragraph 4** Clearing of vegetation during the construction activities. Divundu is one of those beautiful towns surrounded by trees and plants that are diverse, ranging from dense riverine woodlands and papyrus swamps at the water's edge to drier acacia and broad-leaved savannah further inland.
Land Use and Development Activities	**Paragraph 5.1(a)** Rezoning of land in this case from **Undetermined** to **Business**
Water Resource Development	**Paragraph 8.6** Construction of any industrial or domestic wastewater pipeline system - in this case, extending water supply and sewerage networks to the proposed development.
Infrastructure	**Paragraph 10.1** The construction of water or other bulk supply pipelines to the proposed development – water, electricity, sewerage, etc..

1.7 OBJECTIVES OF THE EMP

This EMP is compiled to address any possible environmental impacts associated with the installation of bulk services on the land. It should therefore be read in conjunction with the environmental scoping report in which identified potential impacts have been evaluated and assessed.

The EMP is to be used as reference manual during the construction phase. As such copies of the EMP must be provided to any third party who may be hired to implement the construction phase. Furthermore, the EMP is intended to support the application for an ECC that is to be submitted to the OEC. When considering the rezoning application, the URTB (urban and regional township board) is also required to have a copy of the ECC.

It is the purpose of this EMP to provide clearly defined actions that should be implemented during the planning and construction stages of the project. It provides specifications that the proponent and any appointed contractor(s) should adhere to in order to minimise adverse environmental impacts associated with construction work that maybe undertaken.

1.8 LEGAL OBLIGATION

The acceptance of this EMP report by the EC and the subsequent granting of an ECC will confer a legal obligation to the developer/promoter to comply with the recommendations contained in the EMP. Should the ECC holder fail to comply with such requirements, it is deemed a contravention of the EMA and as such is criminally prosecutable.

The legislation framework covering the proposed activity has been presented in the scoping section of the report and is not repeated here.

2. PRESENTATION OF THE ENVIRONMENTAL MANAGEMENT PLAN

2.1 INTRODUCTION

Described in this section is the EMP – a document in which the measures taken in order to minimise the development's negative impacts to the environment are presented in great details. Specific actions for mitigation, monitoring and management during all phases of the proposed project are detailed from planning, designing through to construction and operation so as to ensure environmental protection and compliance with regulations.

2.2 COMPONENTS OF THE EMP

Some of the key components of the EMP are mitigation, monitoring, management & control, contingency planning and compliance.

Component	Expansion
Mitigation	Specifies the actions to avoid, reduce, or eliminate potential negative impacts on the environment and social structures.
Monitoring	Describes how the project's environmental performance will be tracked and measured to ensure mitigation measures are working.
Management actions/control	Includes a framework for managing environmental performance, such as the roles and responsibilities of staff, incident reporting, and the use of personal protective equipment.
Contingency Planning	Addresses potential unforeseen impacts and outlines the response measures needed.
Compliance	The project is required to adhere to all applicable environmental laws, permits, and stakeholder requirement

Typically, an EMP is created during the planning and approval stages of a project to demonstrate to the OEC (the regulator) that the proponent has a plan to manage environmental risks associated with the envisaged development.

It serves as a practical, guidance document for the project team and contractors to follow. As such the EMP can be a legally binding document that requires compliance. It is a "living document" that should be updated as and when the project progresses or if new information arises

2.3 FUNCTIONS AND RESPONSIBILITIES

Formal responsibilities are necessary to ensure that key management measures/procedures are executed. The promotor will be responsible for the overall control of the project site. In **Table 5** are some of the functions and responsibilities related to the proposed development.

Table 5: Roles and Responsibilities

The Party	Functions and Responsibilities
The Environmental Commissioner (EC)	The OEC is responsible for ensuring and enforcing compliance with the relevant environmental legislations and regulations of EMA. Amongst the roles and functions of the EC are to : - grant the ECC and renewals thereof; - ensure overall compliance with the provisions of the EMP; - review this document and any revisions thereof; - undertake site audits at their discretion; - review any environmental audit reports submitted to MEFT; - review any major environmental related incidents/accidents, and - enforce the legal mechanisms for contraventions of the EMP.
Divundu Village Council (DVC)	The project site is within the jurisdiction of DVC. In this regard DVC has various roles and functions to play with respect to the development. Some of these are to: - ensure village council bylaws are complied with; - issue fitness certificates to businesses where applicable; - supply adequate clean potable water; - remove waste from the business premises; - conduct site inspections/visits at their discretion; - review and approve all building plans submitted for the development; - review and approve the layout proposed for the land allocated for development; - keep the streets well lit at night, street roads clean and tidy; - ensure that high standards of safety and health are upheld and maintained throughout the lifespan of the development, and - enforce legal mechanism for any contraventions of municipality bylaws.
Rware Trading Enterprises (RTE)	The promotor (RTE) has to ensure that: - an ECC and any other applicable permits are obtained and kept on file; - the layout and designs are prepared by experienced and qualified professionals and that approvals from DVC is obtained; - a reputable and experienced construction company is appointed to carry out the required civil construction work; - adequate training on the EMP is provided to all prospective employees as well as to any third parties who may be hired for any civil engineering work including maintenance and or renovation; - ongoing compliance is maintained with all applicable legislations, regulations and policies pertaining to the development; - a competent and experienced Environmental Control Officer (ECO) is appointed to take charge of all safety, health and environmental aspects of the development especially during the construction phase; - A waste management plan to deal with both hazardous and non-hazardous waste is developed and implemented, and - An emergency response plan for the project is developed and implemented.
Environmental Control Officer (ECO)	Amongst the roles and functions of the ECO are to: - manage and facilitate communication between the parties, i.e. the promotor, the appointed civil contraction company and IAPs with regard to matters related to construction activities; - ensure overall compliance of the provisions of this EMP - undertake site inspections of the construction site including installation of all infrastructure; - assist the appointed civil construction company in finding solutions pertaining to matters arising during construction activities of the project; - advise the civil contraction company on the removal of any person and /or equipment not complying with the provisions of the EMP; - make recommendations to the promotor with respect to issuing of fine(s) for any infringement of the updated EMP;

The Party	Functions and Responsibilities
	▪ assess, review and approve any training materials (in written content, manuals, workbooks, visual and in digital formats) to be offered to all personnel working on the project; and ▪ undertake an annual review of the EMP and recommend any additions or amendments as dedicated by the situation/circumstances on the construction site.
Site Manager (SM) /Contractor	A Site Manager has to be appointed during the construction phase with these minimum obligations: ▪ Responsible for the implementation of the EMP during the construction phase; ▪ Ensure that all tasks undertaken under the scope of the work, are performed in a safe and hazardous free and secure environment; ▪ Ensure that all employees hired to work on the project: o are hired in compliance with the Labour Act, o are given an induction on the EMP; o are provided with suitable PPEs; o are working in a safe and accident-free environment, and o are provided with regular training, and made aware of their environmental obligations, etc. ▪ Manage all the day-to-day management activities including the resource allocated to the project; ▪ Hold daily meetings (tool box talks) with the various teams to discuss the current operational activities associated with such activities, and ▪ Receive visitors to the construction site including government and local authority officials.

2.4 ENVIRONMENTAL AWARENESS PLAN

Legislation requires of the promotor to develop an environmental awareness plan that describes the manner in which the employees are informed of any environmental risks that may arise during the implementation of the development in this case. This also includes the manner in which risks are mitigated to avoid pollution or the degradation of the environment. In recognition of the need to protect our environment, environmental management should not only be seen as a legal obligation but also as a moral obligation.

It is important to ensure that all relevant personnel have the appropriate level of environmental awareness and competence to ensure continued environmental due diligence and ongoing minimisation of environmental degradation and harm.

To achieve effective environmental management, it is important that employees are made aware of their responsibilities in terms of the relevant environmental legislation, the contents of this EMP as well as to conditions attached to the ECC once granted.

2.5 ENVIRONMENTAL AND SOCIAL TALK TOPICS

It is recommended to have regular meetings or toolbox talks at the beginning of each shift where environmental and social issues are placed on the agenda for discussion. As a minimum, the following topics are proposed for discussion:

- Water quality; water use & consumption;
- Soil and groundwater contamination;
- Namibia's total fossil emissions (CO_2)
- Namibia's per capita emissions (this was 1.48 tons per person in 2022 which is considered low when compared to man countries in the world).
- Power consumption, energy efficiency and alternative energy sources;
- Types of waste, their storage, handling and disposal;

- Noise pollution;
- Parking arrangements at the construction site;
- Speed limit,
- Greenhouse gas emission reduction targets of Namibia – 91% by 2030.

2.5.1 Duty of Care

All personnel involved with the construction activities should be responsible for implementing measures to prevent pollution or degradation of the environment from occurring, continuing or recurring. Failure to comply with the above conditions is a breach of the duty of care. If such harm is unavoidable, steps must be taken to minimise and to rectify such pollution or degradation of the environment.

2.5.2 Documentation and Reporting

Industry developed standards should be used to complete incidents records related to:

- Complaints received from IAPs including date and action taken;
- Emergencies and or accidents including date and or action taken;
- Environmental incidents involving employees and /or members of the public, date and action taken to prevent re-occurrence;
- Environmental complaints and correspondences received from IAPs, and
- Incidents that cause harm or may cause harm to the environment.

2.6 Management Actions/Mitigation Measures

The EMP has been presented in four tables arranged under these headings:

- EMP for the Planning and Design Phase (**Table 6**)
- EMP for Construction Phase (**Table 7**)
- EMP for Rehabilitation / Decommissioning Phase (**Table 8**)
- EMP for the Operational Phase (**Table 9**)

2.6.1 EMP for the Planning and Design Phase

With respect to the 'Planning and Design Phase" management actions have been provided for aspects related to compliance, decarbonisation initiatives, appointments, communication and reporting. The promotor is the party responsible for all aspects related to this phase.

2.6.2 EMP for Construction Phase

At the time of preparing this updated EMP, the project was still in the planning and design stage with no activities having taken place on the site. Management actions have therefore been provided to cover the construction stages of the project. The table has been divided into five columns with these headings:

- Environmental Aspects
- Potential Impacts
- Recommended Management Actions
- Timing when the intervention should be made, and
- The Party Responsible for ensuring compliance.

2.6.3 EMP FOR OPERATIONAL PHASE

At this stage the scoping assessment has been targeted at the land formalisation process and related environmental impacts associated with the installation of bulk services and infrastructure to the land to be rezoned from 'undetermined' to ;business'. With respect to the operational phase, the nature and scope of activities that will be performed are unknown at this stage. In the event that the activity that will be performed on the premises is a listed activity, an EIA will have to be conducted to assess potential impacts that such an activity will bring to bear on the receiving environment.

2.6.4 EMP FOR CLOSURE AND DECOMMISSIONING /REHABILITATION

In the context of this project, closure and decommissioning is intended to deal with those environmental impacts related to the decommissioning or demobilisation of the constructor's construction camp from the project site on completion of construction activities. The end results for the project is delivery of a fully serviced business stand. At the stage of conducting the EIA, the promotor was uncertain on type of business activities to be conducted on the premises once all services have been installed.

It is therefore not expected that the business serviced stand will be decommissioned, i.e. closed down and rehabilitated. In this EMP mitigation measures are provided with respect to the removal of contractor's construction camp, plant and machinery.

There is an inherent environmental risk associated with decommissioning of construction sites and it important that the rehabilitation operation is well planned and executed in manner that is both expeditious and well-coordinated.

3. RECOMMENDATION

While every attempt has been made to address all possible potential mitigation measures in this document, the EMP should be considered as a day-to-day management tool, which sets out the minimum environmental and social standards that are required, in order to minimise the negative impacts and maximize the positive benefits associated with the proposed development.

The EMP should be reviewed on an on-going basis and any changes or amendments made communicated to the OEC. Based on the observations made during the site inspections it is incumbent upon the proponent, before the contractor moves on site, to make a careful assessment of whether any modifications to the mitigation measures, contained in this EMP may be required, in order to improve the overall efficiency and applicability of the EMP to the prevailing circumstances.

Ekwao Consulting is confident that the management measures outlined in the EMP to mitigate the environmental impacts are adequate, and if implemented will result in minimal impacts to the receiving environment.

It is recommended that the application for an ECC submitted by Rware Trading Enterprises CC be approved subject to any conditions which the OEC may wish to impose.

Table 6: EMP for the Planning and Design Phase

<table>
<tr><th>Aspects</th><th>Potential Impacts</th><th>Environmental Objective(s)</th><th>Management Actions/Mitigation Measures</th><th>Monitoring Frequency</th><th>Party Responsible</th></tr>
<tr><td>Compliance</td><td>Minimal – phase does not involve physical activities</td><td>Compliance with applicable regulations, policies and local authority bylaws is vital.</td><td>All drawings should comply with local standards and specifications where those exists (i.e. NSI, etc.) or SABS where local standards and specifications are not developed.
Any permits or licenses that may be required, i.e. ECC should be in place and valid prior to starting with any physical activities on the ground.
All consumables that may be required for the development, i.e. water and electricity must be procured in a lawful manner with connections made by qualified service providers.
Comply with reporting requirements for all permits/licenses including the ECC.</td><td>At the beginning,
Ongoing throughout the implementation phase</td><td>Promotor /RTE</td></tr>
<tr><td>Appointments</td><td>None – no physical activities involved</td><td>Offer work opportunities/ employment on merit without any prejudices</td><td>Ensure that all applicable service infrastructure is designed by qualified and experienced professionals preferably with knowledge of the local conditions.
Appoint a civil construction company who is reputable, experienced and with a track record and preferably with the local knowledge.
Appoint an ECO (Environmental Control Officer) who is qualified and experienced to oversee the construction phase of the project.
Appointments for construction companies and or staff personnel should be made on merit and in a manner that is both fair and transparent. (Justification for hiring non-locals should be provided to the line ministry).</td><td>Prior to starting with construction
Ongoing throughout the construction phase</td><td>Promotor
/
RTE
/
Contractor</td></tr>
<tr><td>Decarbonisation</td><td>None, but positive impacts are derived in the long term if implemented.</td><td>Strive to minimise the carbon footprint of the development.</td><td>Embrace decarbonisation initiatives in the design phase, i.e. position and orientate building structures to facilitate easier installation of solar panels with maximum exposure to sunshine.
Adopt green technology when selecting equipment for the development with emphasis given on the use of hybrid systems; i.e. systems that can be powered by a combination of wind, solar and grid power.
Allow the design for the development to facilitate easier water recycling including procurement of solar geysers instead of conversional electricity powered geysers.
Design the development in a manner that provides adequate day natural light and makes use of energy saving bulbs.</td><td>Design phase, prior to starting with construction</td><td>Promotor /Designers</td></tr>
<tr><td>Communication</td><td>None</td><td>Provide regular communication to stakeholders & IAPs</td><td>Contact numbers of these service providers must be clearly displayed on a notice board:<table><tr><td>Divundu Police</td><td>066 259 432</td><td>Fire Brigade (Rundu)</td><td>081 239 9847</td></tr><tr><td>Ambulance</td><td>081 9696 0819682 (MVA)</td><td>National Emergency Nos.</td><td>10 111, 999 or 112</td></tr></table></td><td>Throughout all project phases</td><td>RTE
/ Site Manager</td></tr>
<tr><td>Complaints</td><td>None</td><td>Develop a fair and transparent complainant procedure</td><td>Any complaint lodged regarding any aspect of the development must be recorded, promptly investigated and corrective action taken.
Allow any opportunity for IAPs to continue raising concerns (complainants) about any aspect of the project that may be affecting them.</td><td>Ongoing throughout the project phases</td><td>RTE
/
Site Manager</td></tr>
</table>

Table 7: EMP for the Construction Phase

Environmental Aspects	Potential Impacts	Management Actions / Measures	Monitoring Frequency	Responsible Party
Socio-economic Aspects	Economic opportunities	▪ Source and procure goods required for the project (building & construction materials) from local suppliers. ▪ Make use of local small-scale contractors for activities such as site clearing, site security policing and cleaning.	When procuring Duration of construction phase	RTE / Contractor / Site Manager
	Employment opportunities	▪ Ensure that employment is offered in compliance with applicable labour laws and regulations. ▪ Hire and recruit without discrimination on the basis of gender, race, language, background, religion or political affiliations. ▪ Conditions of employment must be in writing with a copy kept on file and one copy given to the employee. The contract must state job specifications, working hours, remuneration, etc. ▪ Keep proper records on the number of employees, fulltime/part-time, contractors hired, payments made to contractors, salaries/wages, etc.	Whenever hiring Or recruiting personnel for the construction activities	Site Manager RTE
	Training, skills and technology transfer	▪ Give all employees an induction on the EMP, housekeeping rules including safety, grievances procedures and company policies and rules. ▪ Provide on-the-job training opportunities to help employees improve their skills level which ultimately leads to high productivity, reduced wastage, motivation, high morale and efficiencies. ▪ Train and raise awareness to sensitize employees about contentious issues like working in urban spaces and control of pollutants (noise, dust, gaseous emissions. etc). ▪ ECO to review and upgrade training materials /training manuals.	Beginning of employment Review quarterly	Site Manager ECO
	Social ills	▪ Ensure that jobseekers do not flock to the construction site in search of jobs and camping or erecting shacks /structures in the vicinity. ▪ Develop a policy on social ills to deal with aspects related to drug and alcohol abuse, etc. ▪ Provide educational topics to employees on issues related to social behaviour HIV/AIDS and general upliftment of employees' social status.	Ongoing throughout the construction phase	Site Manager RTE
	Safety & Security	▪ Access to the project site must be controlled and security manned on the basis 24/7. ▪ Provide a safe and hazardous-free working environment and ensure appropriate supervision of all activities is provided. ▪ Record and report all accidents and incidents to the relevant stakeholders, DVC or line ministry.	Daily throughout the construction period	Site Manager or as otherwise delegated

		▪ Put preventative measures in place when servicing and conducting maintenance works including repairs to construction vehicles, i.e. oil drip trays, non-porous surfaces, funnels, non-damaged containers. ▪ Refueling to be performed in areas with adequate preventative measures in place. ▪ Provide adequate and good quality break areas where employees can take their lunch breaks, etc. ▪ Provide suitable PPEs. ▪ All visitors must report to the security and sign a visitor's registry and be given a brief induction on the EMP.		
Impacts on Existing Services and Infrastructure	▪ Damage ▪ Theft ▪ Vandalism	▪ All existing infrastructure in the vicinity of the project site (overhead powerlines, roads, water pipelines, etc.) should be identified and where any servitudes exist, such should be clearly demarcated prior to starting with land serving. ▪ Consultation should be held and written permission obtained from relevant utility providers / owners of infrastructure (e.g. DVC, Roads Authority, Namwater, Nampower/ Cenored, etc.) where work has to be performed near such infrastructure or where such infrastructure need to be relocated. ▪ All construction activities must be well planned with all areas to be excavated clearly demarcated and preferably marked on the drawings. ▪ The appointed contractor must be provided with a map/diagram showing all existing infrastructure/services on site.	Daily Weekly Throughout the construction phase	Site Manager ECO
Traffic Impacts	▪ Accidents ▪ Incidents ▪ Injuries ▪ Loss of assets (even life)	▪ No direct traffic access is allowed from project premises/site to the adjacent B8 trunk road unless special permit is obtained in writing from RA. ▪ A minimum speed limit of 30 km per hour to be imposed on all internal routes within the 40 000 square meter project footprint. ▪ Clear and appropriate vehicle movement signage on intersections leading to the construction site are to be set up in conjunction with the DVC and or RA. ▪ Where feasible construction vehicles may not be operated on the B8 trunk road after sunset, i.e. between the hours of 18h00 and 05h00. ▪ No construction vehicle should be allowed to park off site, except in dedicated parking spaces as may be agreed between the proponent and DVC technical staff.	Daily Weekly Monthly	Site Manager ECO

Impacts on Fauna and Flora	Loss or change of faunal habitats	▪ Limit habitat destruction by confining excavation /trenching activities to clearly demarcated sections of the project footprint. ▪ All sites that are to be cleared must be preceded by careful planning including demarcations of such sites. The site that leads to the least destruction of habitats must be selected. ▪ The line or route of activity should be determined beforehand and activities restricted to such demarcated areas. ▪ The project site should be kept tidy, clean and free of rubbish and food items that could potentially attract animals and pests (flies, insects, bugs, etc.). ▪ Where feasible site construction activities away from any known sensitive areas (breeding areas, etc.). ▪ Poaching or catching of livestock (goats, sheep and cattle) that often roam around on the property is strictly forbidden. ▪ Waste food items must be kept in bins with lockable lids to prevent scavenging by wildlife. ▪ Trees with trunk diameter larger than 0.5m mm must not be cut down and any birds nestling in such trees may not be disturbed. ▪ Lighting at the construction site must be directed downwards and not upwards to avoid blinding nocturnal birds around the facility.	Daily Weekly Report quarterly	Site Manager ECO
	Loss or change floral diversity	▪ Sites that are to be cleared of vegetation must be preceded by careful planning including demarcations of such sites. The site that results in the least removal of vegetation and least destruction must be selected. ▪ Felling down of trees for purposes of firewood harvesting is not allowed. Employees staying on site should be provided with gas powered devices to prepare meals. ▪ Efforts should be made not to destroy any flora species with a protection status that may be encountered during construction activities. Such species must be protected and preserved. ▪ All construction activities required for the installation of services must be well planned and carefully executed to ensure minimal removal of vegetation, plants and trees. ▪ Where possible mature trees with trunk diameter larger than 0.5 m must be preserved. ▪ An overall commitment to the environment should be demonstrated by adopting a minimalistic damage approach throughout the development. ▪ Areas disturbed by construction activities to install services and infrastructure that are not required for the development should be promptly rehabilitated and not left exposed and unrehabilitated for longer periods. ▪ Introduction of potentially invasive alien ornamental plant species should be avoided at all costs. ▪ For landscaping, it is recommended to plant local indigenous species of flora.	Daily Monthly Report quarterly	Site Manager ECO

Site Security, Safety and Public Health	Potential injuries/accidents to personnel,	▪ Maintain strict security that prevents unauthorized entry to the construction site. ▪ Develop an Emergency Response Plan (ERP) as well as an Accident Response Plan (ARP) for the site to deal with i.e. fire outbreak, accidents, etc. ▪ Provide adequate sanitation facilities that must be well maintained and kept tidy and clean at all times. ▪ Provide employees with suitable PPEs. ▪ No alcohol, drugs, firearms, dangerous knives, etc. must be brought to work or kept on the construction site. ▪ Waste, both non-hazardous and hazardous on the premises must be handled in the line with the EMP.	Access to be manned 24/7 Daily Duration of construction phase	RTE Site Manager ECO
Impact on Surface and Groundwater Sources	▪ Potential Contamination ▪ Potential Pollution	▪ Ensure that the design and layout of the development infrastructure is prepared by qualified and experienced professionals preferably with knowledge of the local environment and geographical terrain of the site. ▪ The designed and infrastructure layout should provide for an engineering solution catering for storm water management system as well as to mitigate against potential contamination and pollution of surface water and groundwater sources. ▪ Appoint a civil construction company who is reputable and with a good track record and knowledge of the local environment. ▪ A preventative maintenance plan for the construction machinery and equipment service infrastructure must be developed and implemented. ▪ A waste management plan (both for hazardous and non-hazardous) must be developed and implemented. No waste products of any kind may be dumped in close proximity of any water sources. ▪ No wastewater of any sort may be discharged directly into the natural environment. ▪ Hazardous products are to be stored in secured and bunded areas to prevent such waste escaping into the natural environment. ▪ Under no circumstances should hazardous waste from the construction activities be discharged on the construction premises. Hazardous waste products are to be temporarily stored in leak-proof containers and disposed of at an approved offsite hazardous waste facility. Keep records of all hazardous waste disposed on file. ▪ Any surface water accumulation from the construction site should be channeled and captured through a proper storm water channel and not discharged into the natural environment. ▪ Any fuel spill /leak in excess of 200 liters is reportable incident.	Prior to starting with construction, Daily, ongoing throughout the construction period	Site Manager ECO

Construction Induced Impacts (site clearing, trenching, etc.)	▪ Potential pollution/emissions to the natural environment, ▪ Dust nuisance to the surroundings,	▪ Land that is to be cleared of vegetation to accommodate excavation activities should be clearly demarcated and work confined to such demarcated areas. ▪ Personnel should be trained and inducted on the requirements of this EMP and sensitized on contentious issues of working in urban environment. ▪ Promote and cultivate a culture of toolbox talks at the beginning of each work session/shift highlighting issues such as safety, littering and protecting of the environment. ▪ Develop and implement work procedures and train personnel on such procedures including enforcing compliance. ▪ Continuous supervision of all activities is to be maintained throughout the construction phase. ▪ Adequate break areas should be provided; ▪ Accidents and incidents are to be reported to the Site Manager and ECO. ▪ The access point to the construction site must be manned by security personnel at all times and no unauthorized personnel is allowed.	Daily, throughout the construction duration	Site Manager ECO
	Gaseous emissions	▪ Manage activities that generate excessive gaseous emissions around the construction site. ▪ All construction vehicles, machinery and equipment in use at the construction site are to be regularly serviced and maintained. ▪ All construction vehicles/equipment and machinery when not in use are to be switched off or throttled back between those periods when not in use. ▪ Enforce a speed limit on all internal routes on the project site.	Daily Weekly	Site Manager ECO
	Noise Pollutions	▪ Limit working hours to daylight hours, i.e. from 06h00 to 17h00. ▪ Manage activities that generate excessive noise pollution. ▪ Provide suitable PPEs to personnel working in noisy areas. ▪ Vehicle horns are only to be used in safety situations and not for any other purpose during working hours. ▪ Machinery should not be overloaded causing engine to work hard generating excessive noise levels. ▪ No loud music is allowed to be played on site and no noise amplification equipment may be kept. ▪ Whenever a complaint has been received regarding noise pollution, investigate and take correction action.	Daily Dispose Weekly	Site Manager ECO
	Dust Pollution	▪ Make use of one access route only with appropriate turning circles and delivery zones. ▪ Provide suitable PPEs to employees working in areas where excessive dust is generated.	Daily	Site Manager ECO

		▪ Make use of dust suppressive measures where feasible as a proactive measure to avoid dust generation. ▪ Ensure that handling of construction materials does not result in fugitive dust escaping into the atmosphere becoming a health nuisance to the workers at the site and the neighbouring communities. ▪ Handling of construction materials including transport of such materials should be suspended or avoided during times of high wind conditions or when a visible dust plume is present. ▪ Locate construction materials in sheltered areas where it is not exposed to erosive effects of the wind. ▪ Enforce a speed limit on all internal routes to reduce dust generation on the project site. ▪ Employ good housekeeping both inside and outside the construction site. ▪ Investigate all complainants received with respect to dust pollution and take corrective action.	Whenever a complainant has been received	
	Lighting (Visual nuisance /annoyance	▪ Lighting requirements should be carefully planned to ensure that its meets the needs of the project in terms of keeping the construction sites secure and safe, without resulting in excessive illumination. ▪ Zones of high and low lighting requirements should be identified with the focus on only illuminating areas to the minimum extent possible to allow safe operations at night and security surveillance. ▪ Up-lighting of structures should be avoided. Light should be directed downwards and focused on the object requiring illumination. ▪ Avoid directing the light towards the areas from where it would become offensive to external receptors including those using the adjacent B8 truck road. ▪ Light spill must be minimised. All security lighting should have 'blinkers' or be specifically designed to ensure light is directed downwards while preventing side spill. ▪ Avoid up-lighting of structures as it has the potential to blind migratory birds that fly at night in the project area particularly between October and April. ▪ Waste around the facility such as windblown papers and plastics should be regularly picked up to avoid visual annoyance	Ongoing throughout the construction phase. Whenever a complaint has been received	Site Manager
	Soil quality loss due to excavations, mixing, trampling, compaction and pollution.	▪ Put preventative measures in place when land/terrain activities take place. ▪ Avoid the possibility of compaction and creation of a hard subsurface in and outside of the construction site. ▪ Do not prepare concrete (mixing of sand, cement, aggregates) on open soil. ▪ Avoid conducting activities that are prone to wind erosion during those conditions of heavy wind blowing.	Throughout the construction phase	Site Manager

		▪ All construction equipment laydown areas should be loosen after the construction period and should not be allowed to remain compacted. ▪ Where possible establish wind erosion barriers to curb possible erosion during high wind periods. ▪ Equipment and vehicles must be in a good condition to ensure that accidental oil spills do not occur and contaminate the soil. ▪ In case of any spills or leaks the entire fuel-soaked soils must be collected and temporarily stored in a leak-proof containers for disposal to an approved offsite landfill area.		
	Fire Risks and Potential for Fire Outbreaks	▪ Develop a Fire Management Plan which includes a fire evacuation plan in collaboration with the DVC local authority. ▪ Train all employees on firefighting methods and how to comply with the fire management plan. ▪ Provide adequate fire extinguishers and keep such devices at strategic locations. Fire extinguishers and all firefighting equipment must be easily accessible, well maintained and kept in functioning states. ▪ All personnel and contractors on the site should comply with the fire management and emergency preparedness and occupational health and safety plans. ▪ Fire toolkit talks should be encouraged and regularly conducted on site and attendance and performance recorded. ▪ Conduct regular fire drills mimicking real life fire situations outbreak. Attendance and performance should be recorded.	Weekly	Site Manager
	Spills and or Leaks of Hazardous Products	▪ If a spill does occur, efforts must be made to contain the spill at the source as soon as possible using suitable equipment. ▪ Make use of a combination of absorbent materials, earthen bunds or other containment methods to contain the spill materials to the smallest area possible. ▪ Recovered spill materials should be temporarily stored in leak-proof containers and disposed of at an approved offsite landfill. ▪ A detailed written report for any major spill that might occur must be prepared and reported to stakeholders. A copy of the report should be kept on file. ▪ It is advisable to keep a spill kit which is adequately stocked on the construction site. ▪ When repairs or maintenance activities are being undertaken, exercise precautions to avoid spills. ▪ Train employees on spill management, spill response and on any refueling activities onsite.	Daily, ongoing throughout the construction phase	Site Manager ECO
	Waste Handling & Disposal	▪ Excavations and removal of overburden and topsoil must be minimised and confined to demarcated areas. ▪ Use topsoil and overburden material removed during the pre-construction for backfilling. ▪ Prevent and minimise business/industrial waste generation as far as possible. ▪ Provide suitable containers and temporary storage areas as close to the point of generation as practically possible.	Daily, ongoing throughout the construction phase	Site Manager ECO

		▪ Re-use waste during construction where possible. ▪ Dispose waste at an approved landfill facility and keep records.		
	Cultural and Heritage Resource	▪ Any items of historical or archeological value unearthed during the construction period should be reported to NHC. ▪ Work should be stopped immediately where any archeological items has been unearthed and should only be continued on the instruction of the officials from NHC. ▪ Any items of archaeological value unearthed during the construction may not be disturbed or moved unless permission has been granted by the NHC. These guidelines are provided: **'Chance Find Procedure'** • If operating a machine, stop work immediately. • Operator must immediately inform the Supervisor. • The site must be demarcated with plastic warning tape. • All work in the immediate vicinity must cease. • Determine GPS position of the place if possible; • No item(s) must be removed from the site. • Supervisor must inform the office of National heritage Council (NHC) and request written permission to remove findings from work area. • Recover, pack and label findings for transfer to the National Museum as guided by NHC. **Human Remains:** Should human remains be found, these guidelines should be followed: • Apply the chance find procedure as described above; • Notify the nearest Namibia Police Charge Office • Schedule a field inspection with an archaeologist or qualified person to confirm that remains are human; • Advise and liaise with the NHC and the Namibian Police. • Remains to be retrieved and transported by NamPol. • Work must only resume on the same site, once the remains have been successfully retrieved by NamPol.	Discuss during toolbox talks Whenever an a 'find' has been discovered	Site Manager RTE

Table 8: EMP for Rehabilitation Post Construction

Activities/ Aspects	Potential Impacts	Management Actions	Timing	Responsible Party
Rehabilitation of the Contractor's Construction Camp	▪ Dust ▪ Noise ▪ Injuries ▪ Accidents, etc.	▪ Clear and completely remove from the site all construction plant, equipment and any storage containers, etc. ▪ Dismantle and remove all erected structures, fencing, barriers, temporarily services and fixtures; ▪ Check areas for any spills of substances, i.e. oil, paint and fuel which should be cleaned up. ▪ All hardened surfaces within the construction site should be ripped, all imported materials removed and the area top-soiled and levelled.	Daily during the rehabilitation phase	Site Manager /ECO
Land Rehabilitation	▪ Waste pollution ▪ Soil contamination ▪ Soil erosion, etc.	▪ All surfaces hardened due to construction activities are to be ripped up and imported materials thereon removed. ▪ Any access roads utilised during the construction phase that are not required for the operational phase of the industrial estate are to be rehabilitated to pre-construction conditions and revegetated; ▪ Landscape the site as directed by the ECO or Site Manager.	Daily during the rehabilitation period	Site Manager / ECO
Removal of Construction Materials	▪ Dust ▪ Noise	▪ All erected structures at the construction site are to be removed. The construction campsite area must be checked for any spills of substances such as oil, paint and fuel which should be cleaned up. ▪ Waste material of any description, including receptacles, scrap, rubble and tires, must be removed and disposed of, at a recognized landfill facility. ▪ No waste must be buried or burned on the site. ▪ Any barriers and demarcations associated with the construction phase are to be removed from the site unless agreed otherwise with the developer. ▪ All residual stockpiles are to be removed from the site and transported for disposal to an approved landfill site. ▪ All leftover building materials (sand, aggregate, bricks, paving, steel, corrugated iron sheet, cement, etc.) must be removed from the site. ▪ All surfaces hardened due to construction activities are to be ripped up and imported materials thereon removed. The area must be top-soiled and paved using heavy duty interlocks. ▪ All building rubble is to be removed from the site and transported for disposal to an approved landfill site. ▪ Burying of any rubble on site or anywhere outside the premises is prohibited.	Daily throughout the rehabilitation	Site Manager /ECO

Table 9: EMP for the Operational Phase

Activities/ Aspects	Potential Impacts	Management Actions	Timing	Responsible Party
Creation of business erven /stands	▪ Social economic benefits at the locals, regional and national levels ▪ Boost to the local, regional and national economy	▪ Opportunities for employment and benefits to the locals – hence an improvement in standard of living ▪ Promote trade and extend business opportunities to the locals. ▪ Try to source raw materials that may be required as input on the created business erven from the local producers/suppliers. ▪ Enhance the use of local labour and local skills as far as practically possible. ▪ Ensure that goods and services are sourced from the local and regional suppliers.	During the operational phase	Promotor (RTE)
Waste Handling and Management	▪ Odour ▪ Nuisance ▪ Eyesore	▪ Each business on the estate that may be created will be expected to develop a Waste Management Plan for activities conducted at their respective business stands. ▪ Ideally, solid waste should be managed in line with the principles of waste hierarchy: waste prevention, waste re-use, waste recycle, waste recovery and waste disposal. ▪ Suitable waste skips have to be provided in line with the DVC guidelines and policies. ▪ Waste removal from each business stand so created is expected to be removed by DVC. ▪ Under no circumstances may waste be buried on site.	Daily Dispose Weekly	Promotor (RTE)
Air Pollution	▪ Nuisance ▪ Potential for health issues	▪ An increase in gaseous emissions resulting from high volume of traffic driving in and out of the business estate may be experienced. ▪ Internal routes within the business estate must be paved to prevent dust being kicked up by traffic delivering or collecting goods from business premises. ▪ A speed limit of 30 km per hour must be set and implemented for all vehicles operated on internal routes in the industrial estate. ▪ Vehicles (trucks and passengers) should be switch off when not in use so as to avoid long idling which leads to increased gaseous emissions. ▪ Open areas on the business estate must be landscaped and re-surfaced to prevent dust generation.	Check quarterly After a complainant has been reported	Promotor (RTE)
Visitors	Fire outbreaks	▪ Develop a fire rescue and management procedure in collaboration with DVC technical staff for the business estate including monitoring. ▪ Install and display adequate safety signage on all levels of the business or buildings that will be developed on the premises.	Daily After an incident Or a complainant has been reported	Promotor (RTE)

		➢ All firefighting system are to be tested and maintained regularly as well as firefighting equipment. ➢ All emergency escape routes to be kept uncluttered and unblocked to allow easy exit from the business premises should the need arise.		
Safety & Health	➢ Injuries ➢ Accidents/incidents	➢ A Health and Safety Management Plan must be developed and implemented for the business estate in consultation with DVC technical staff. ➢ All entrances and exits in and out of the business estate should be structurally sound and safe at all times. ➢ Ensure that security personnel are adequately trained and visible throughout the public spaces within and outside the business estate. ➢ Ensure that an effective complainant recording is put in place and implemented.	Weekly Each time after an incident/accident After any complain	RTE