Application No: 250814006242

ENVIRONMENTAL MANAGEMENT PLAN FOR CLOSURE & REHABILITATION PLAN FOR THE EXISTING WASTE DISPOSAL SITE FOR EENHANA TOWN COUNCIL, AT EENHANA TOWNLAND, OHANGWENA REGION

CONSULTANT:

Mr. Ipeinge Mundjulu (BSC, MSc)

Red-Dune Consulting CC

P O Box 27623 Windhoek

Cell: +264 81 147 7889

PROPONENT

Eenhana Town Council

Private Bag 8007,

Eenhana

DOCUMENT INFORMATION	
DOCUMENT STATUS	**FINAL**
APPLICATION NO.	**250814006242**
PROJECT TITLE	Environmental Management Plan and Closure & Rehabilitation Plan For The Existing Waste Disposal Site For Eenhana Town Council, at Eenhana Townland, Ohangwena Region
CLIENT	Eenhana Town Council
LOCATION	Eenhana Town, Ohangwena Region
AUTHORS	Mr. Ipeinge Mundjulu 
DATE	09 September 2025

Table of Contents

List of Figures

List of Tables

ACRONYMS

DEA	Department of Environmental Affairs
EA	Environmental Assessment
EAP	Environmental Assessment Practitioner
ECC	Environmental Clearance Certificate
ECO	Environmental Compliance Officer
EIA	Environmental Impact Assessment
EMA	Environmental Management Act (No. 7 of 2007)
EMP	Environmental Management Plan
ETC	Eenhana Town Council
MET	Ministry of Environment and Tourism
PPE	Personal Protective Equipment
RD	Red-Dune Consulting CC
SM	Site Manager

Chapter 1. Introduction and Background

1.1. Introduction

Eenhana was proclaimed a settlement in 1992 and a town in 1999. At that time, no law required an environmentally friendly waste-disposal facility; instead, a simple dumping site was used, with no provisions for environmental management. The Office of the Environmental Commissioner in the Ministry of Environment and Tourism inspected the site and recommended its closure because it lacked measures to protect groundwater. Additionally, several community members complained about air pollution, making the site a nuisance to residents living nearby.

1.1.1. Development of Environmental Management Plan

Eenhana Town Council (ETC) initially submitted an Environmental Management Plan and a Closure & Rehabilitation Plan for the existing waste disposal site on 16 July 2019, under application number APP-00270. The Office of the Environmental Commissioner (EC) responded with a letter dated 18 October 2019, declining the continued use of the waste site and directing ETC to identify an alternative site **(Annex 1).** In response, ETC submitted a letter dated 25 November 2019, requesting the EC to consider extending the timeframe for commissioning a new waste site while allowing ETC to continue using the existing site in the interim **(Annex 2).**

Although efforts to establish a new waste site have been ongoing since June 2019, ETC has been unable to commission the new site due to financial constraints. Consequently, ETC has continued using the existing waste disposal site in accordance with the Environmental Management Plan submitted in July 2019. ETC is hereby requesting the Office of the Environmental Commissioner to grant permission to continue using the current waste site while mobilizing resources to establish the new facility.

This EMP is developed to guide to ongoing usage of the waste site and in accordance to the terms of reference from office of the EC, a closure and decommissioning plan, since efforts are ongoing to commission a new solid waste disposal site.

1.2. Statutory Requirement

The protection of the environment is provided for under Article 95l of the Namibia Constitution. The Environmental Management Act (Act No 7 of 2007) (EMA) and its Environmental Impact Assessment Regulation 2012, list handling and disposal of waste as an activities that cannot be undertaken without an Environmental Clearance Certificate (ECC) (Table 1).

Table 1 Listed activities in relation to the operation of the waste disposal site

Activity	Listed Activity under EMA
• **Activity 2.** Operation of Disposal Sites	2.1 The construction of facilities for waste sites, treatment of waste and disposal of waste;

1.3. The need and desirability of the project

The dangers of uncontrolled waste disposal are well documented, ranging from environmental degradation and contamination of soil and surface and groundwater to threats to human and animal health and aesthetic nuisances. Solid waste in landfills undergoes decomposition, producing liquids (leachate) and greenhouse gases such as methane and carbon dioxide. During rainfall, water percolates through the waste and carries a mixture of contaminants into the ground. Because the current site lacks leachate-containment measures, it poses a significant threat of groundwater contamination.

Chapter 2. Project Description

2.1. Location

Eenhana town council operates a waste disposal site on west side outskirts of town (-17.486115°"S, 16.311923°"E) (Figure 1).

Figure 1 Existing waste disposal site at Eenhana Town Council

2.2. Operation

The waste site primarily receives household waste, including beverage containers, cans, bottles, and plastics. Hazardous waste, such as medical waste, is not disposed of at this location. The site is fenced for security purposes; however, some sections of the fencing have been stolen. A security guard is employed to monitor and safeguard the premises. Waste management at the site involves backfilling and compaction, achieved using a bulldozer to ensure efficient utilization of space. Previously, burning was the main method used to reduce waste volumes. However, this practice has been discontinued due to concerns over smoke emissions and the site's proximity to the public. The site also collaborates with recyclers, primarily involved in the collection of plastic containers (see Figure 2).

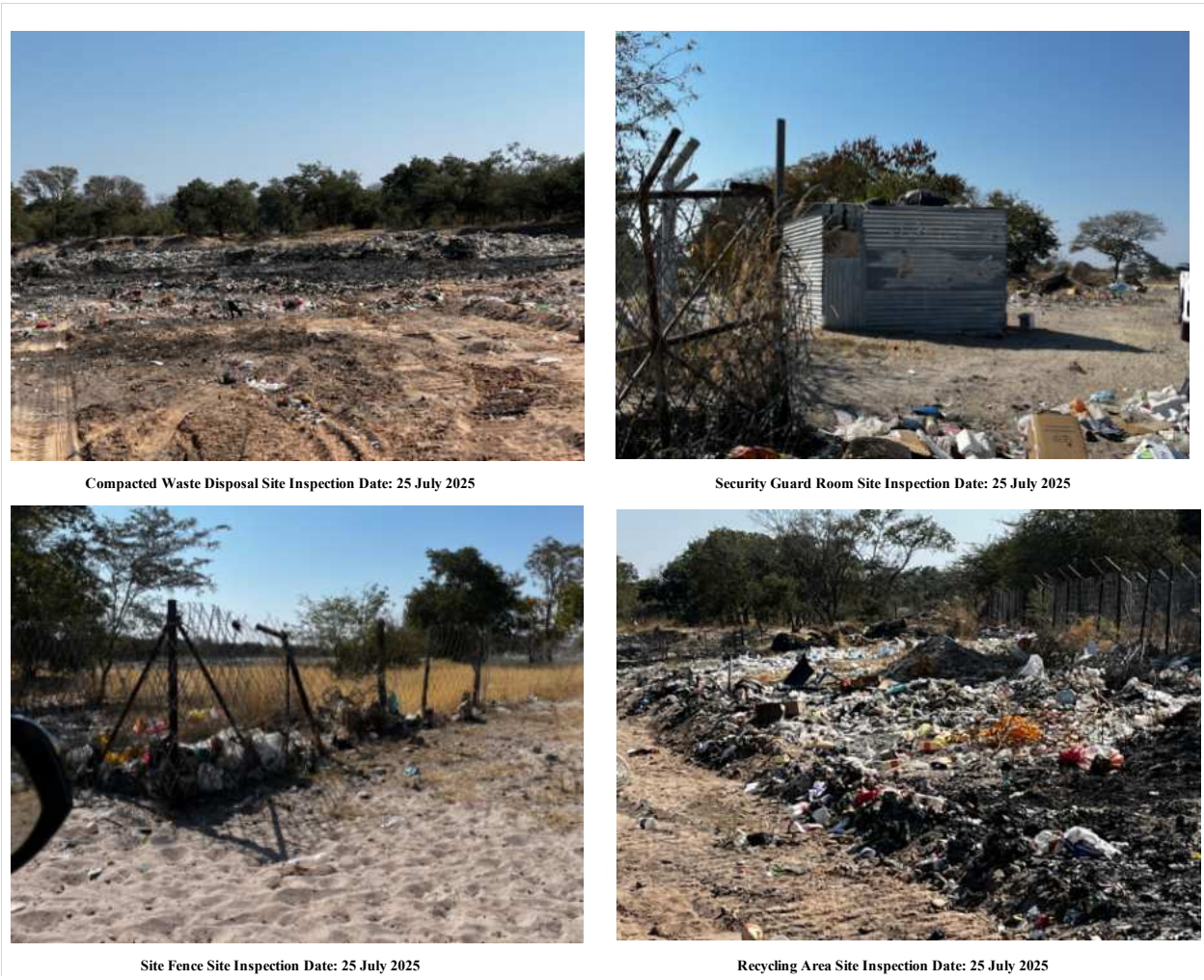

Figure 2. Eenhana existing waste disposal site

Chapter 3. Environmental Audit

On 25 July 2025, Red-Dune Consulting conducted an environmental audit of the existing waste disposal site. The audit aimed to assess the current operational practices, identify environmental concerns, and provide guidance for improved waste management. The following key observations were made:

- **Site Management and Operational Practices:** The site is generally well-managed, with commendable implementation of backfilling and compaction techniques. These practices have proven effective in optimizing the available space, maintaining environmental hygiene, and minimizing potential nuisances such as odour and wind-blown litter.

- **Security and Animal Intrusion:** A significant portion of the perimeter fencing has been reported stolen, resulting in compromised site security. This breach has led to the intrusion of livestock, particularly goats, which were observed grazing within the disposal area. The presence of animals poses several risks, including potential physical harm, ingestion of hazardous materials, and interference with ongoing waste management operations. It is critical that the fencing be repaired or replaced to restore full site security and prevent future intrusions.
- **Topography and Visual Impact:** The waste site is situated within a gully-type formation, which has resulted in uneven terrain and an undesirable visual impact on the surrounding environment. Substantial filling is required to level the site and improve its appearance, contributing to better aesthetic integration with the town. Moving forward, careful waste disposal and management practices specifically, additional backfilling and compaction will be essential in levelling the gully while establishment a new site, thereby enhancing the site's stability and visual appeal.

Considering these findings, it is recommended that the Town Council prioritize the restoration of site fencing, implement stricter access controls, and continue with strategic waste compaction and backfilling to ensure environmental compliance, improve site safety, and support a smoother transition toward the closure and rehabilitation phase, while preparing for the establishment of a new, modern waste disposal facility.

Chapter 4. The Environmental Management Plan

4.1. Purpose of the EMP

The key objective of this EMP is to ensure that all activities associated with existing ETC solid waste disposal site are carried out in an environmentally sustainable and legally compliant manner. It serves as a comprehensive risk management strategy designed to address and mitigate potential environmental impacts associated with the project. It provides a clear logical framework that outlines what needs to be done, how it will be monitored, and the steps to reduce potential negative effects on the environment. It ensures that environmental protection is integrated into every phase, including ongoing operation, closure and decommissioning in alignment with relevant legal and regulatory requirements.

Furthermore, the EMP clearly defines the roles and responsibilities of all stakeholders involved in the project, including the ETC, contractors, and regulatory authorities, to ensure accountability, effective implementation of mitigation measures, and continuous environmental performance improvement.

4.2. Key Legal Framework

The implementation of this Environmental Management Plan (EMP) is guided by the national legal and regulatory framework governing environmental protection and sustainable development in Namibia. Compliance with these laws is essential to ensure that the project is conducted in an environmentally responsible manner and in alignment with both national priorities and international best practices. A list of KEY legislation and policies includes:

1. **Namibian Constitution:** Requires the State to actively promote and maintain the welfare of the people and to protect ecosystems, ecological processes, and biodiversity for present and future generations.
    - *Applicability: Underpins all environmental protection and biodiversity conservation* requirements.
2. **Environmental Management Act No. 7 of 2007:** Promotes sustainable environmental management and resource use; establishes environmental assessment and control processes.

- *Applicability: Requires environmental clearance for listed activities to prevent environmental damage.*

3. **Draft Pollution Control and Waste Management Bill:** Regulates and prevents discharge of pollutants to air and water and provides for general waste management.
   - *Applicability: Aims to prevent contamination from hydrocarbons, oils, and other pollutants from vehicles and machinery.*
4. **Environmental Policy Framework (1995):** Subjects developments and projects to environmental assessment and provides guidance for conducting assessments.
   - *Applicability: Ensures potential impacts are considered and addressed during project planning and development.*
5. **National Solid Waste Strategy:** Sets out the national approach to controlling and managing solid waste.
   - *Applicability: Directly applies to solid waste disposed at the site and guides waste management practice.*
6. **Regulations Relating to the Health and Safety of Employees at Work (Reg. No. 156)**: Promotes the safety and health of employees in the workplace.
   - *Applicability: Protects workers exposed to noise, dust, and other occupational hazards at the site.*
7. **Public Health Act No. 1 of 2015:** Protects the public from nuisances and conditions dangerous or injurious to health.
   - *Applicability: Requires mitigation to prevent aesthetic nuisances and water pollution affecting public health.*
8. **Labour Act No. 11 of 2007:** Outlines labour laws, including worker protection and safety.
   - *Applicability: Governs labour requirements during site operations and decommissioning.*
9. **Regional Councils Act, 1992 (Act No. 22 of 1992):** Establishes regional councils responsible for regional planning, coordination, and development oversight.
   - *Applicability: Requires compliance with regional planning and by-laws relevant to the site.*

4.3. Roles and Responsibilities

To promote accountability, effective implementation of mitigation measures, and continuous environmental performance improvement, it is essential to assign clear delegation of roles and responsibilities across all levels of the project. The following outlines the key roles and their associated responsibilities to ensure the successful implementation of the EMP.

Table 2. Roles and Responsibility

Role	Responsibility
Proponent: ETC	1) Overall responsibility for ensuring that the project complies with all environmental legislation and regulations. 2) Allocate resources and budget for the implementation of the EMP. 3) Appoint an Environmental Control Officer (ECO) to oversee day-to-day environmental management on site. 4) Ensure that the EMP is regularly reviewed and updated to reflect any changes in project scope, legislation, or environmental conditions. 5) Liaise with regulatory authorities and stakeholders to report on environmental performance and address any concerns.
Environmental Compliance Officer (ECO)	1) Monitor and ensure compliance with the EMP, environmental regulations, and site-specific requirements. 2) Conduct regular site inspections to verify the implementation of mitigation measures. 3) Coordinate with project personnel to ensure proper waste management, pollution control, and safety protocols are followed. 4) Prepare regular environmental performance reports, including monitoring results and corrective actions, and submit these reports to the project proponent and relevant authorities. 5) Lead training sessions for project staff on environmental best practices and legal obligations. 6) Act as the primary point of contact for environmental matters and regulatory agencies.

	7) Modifying or improving mitigation measures for purposes of corrective action
Site Manager	1) Ensure the project's overall operations are conducted in accordance with the EMP and approved environmental permits. 2) Supervise all exploration activities to ensure they align with environmental guidelines. 3) Work closely with the ECO to implement corrective actions when environmental non-compliance is identified. 4) Ensure that all personnel are appropriately trained in environmental procedures and that they adhere to the safety protocols established in the EMP.
Contractors and Subcontractors	1) Ensure that all contracted activities comply with the EMP and all applicable environmental regulations. 2) Provide their workers with adequate environmental and safety training. 3) Monitor and report on the environmental performance of their activities. 4) Implement mitigation measures specific to their scope of work as outlined in the EMP and ensure that they are properly maintained.
Ministry of Environment, Forestry and Tourism (MEFT)	1) Review and approve the EMP. 2) Conduct inspections and audits to ensure compliance with environmental laws and regulations. 3) Provide oversight and guidance on environmental compliance.

4.4. Mitigation Measures Tables

The mitigation measure tables are systematically structured to address specific social and biophysical environmental issues that may arise during ongoing operation and at closure and decommissioning phase.

4.5. Operational Phase

Environmental / Social Impact	Objectives	Proposed Mitigation Measures	Monitoring Indicator	Party Responsible
Employment	To improve the socio-economics of locals	1. Employment opportunities should be given to locals for all general work 2. Provide working contract to employees 3. Gender mainstreaming must be considered during recruitment process	Record of industrial actions	Site Manager
Induction	To ensure that all stakeholders are familiar with the requirements of the EMP	1. All stakeholders must go through an induction course for the provision of the EMP. 2. Staff operating specialised equipment and heavy vehicle must be properly trained 3. Provide awareness to the employees on danger of alcohol, (HIV/AIDS) and drug abuse 4. Provide Condoms at friendly site on site, such as toilets	Induction Minutes, report and Attendance Register	Site Manager
Ecological impact	To ensure protection of animals	**Fauna** 1. Ensure that there is security to guard the perimeter who must lock the gate every time 2. No animal including pets must be allowed in the landfill site.	Visual inspection	Site Manager

Environmental / Social Impact	Objectives	Proposed Mitigation Measures	Monitoring Indicator	Party Responsible
Visual Impact	To prevent litter / waste scattered all over and preserve aesthetic value	1. All recyclable material should be recycled, explore memorandum of understanding with recycling companies; 2. Only appropriated vehicles with mesh that prevent waste from being blown away can be used to transport waste 3. Implement daily filling and compaction to prevent waste from being blown away; 4. Leave a buffer zone of undisturbed vegetation to act as wind breakers and protect the site from wind 5. In the absence of compaction, burn the waste in an appropriate manner that does not risk fire outbreaks and nuisance to the public.	Scattered Litter, Visual inspection	Site Manager
Air Pollution	To minimise dust pollution and bad smell.	1. Implement daily waste compaction to prevent bad odours 2. Spray the access road using grey water to suppress dust; 3. Install speed humps to limit speed 4. Keep a complaint register for dust and other impacts	Bad odours and complaints from workers	Site Manager

Environmental / Social Impact	Objectives	Proposed Mitigation Measures	Monitoring Indicator	Party Responsible
Traffic	To ensure coordinate movement of waste removal vehicle	1. Trucks must be installed with a rotating headlight beam lights 2. Truck must maintain a low speed to prevent excessive dust 3. The road must be maintained by scrapping and compacting 4. Install warming signs where necessary	Records of public complain Visible warning signs	Site Manager
Water Pollution	To prevent surface and ground water	1. To prevent surface water pollution, construct storm water system to prevent run of water from entering the site. 2. Ensure frequent filling and compaction to prevent infiltration.	Water quality baseline and monitoring	Site Manager
Health and Safety	To ensure good health and safety for the employees and public	**Health** 1. Employees must NOT be exposed to noise levels above the required -85dB (A) limit over a period of 8 hours. 2. Adhere to the Labour act, non-toxic human dust exposure levels may not exceed 5mg/m3 for respiratory dust and 15mg/m3 for total dust. 3. Supply clean drinking water to the site, such as portable water tank; 4. There must be two suitable, clean and user-friendly ablution facilities, with separate Male and female toilets.	Induction Minutes Valid driver licenses for heavy vehicles Complain of health issues by employees Minimal vermin and bad odour PPE for all employees	Site Manager

Environmental / Social Impact	Objectives	Proposed Mitigation Measures	Monitoring Indicator	Party Responsible
		5. Ensure daily compaction of waste to prevent decomposition that may attract odour, flies, rodents, which causes vermin and diseases 6. Provide employees with adequate PPE 7. Avoid waste compaction during extreme windy condition **Safety** 8. Ensure that every employee went through an induction course about safety; 9. Employees must be equipped with all necessary Personal Protective Equipment (PPE). These includes, Helmet, Overall, Safety Shoes, Safety Glasses, Gloves, Earmuff etc; 10. During operation, minor accidents are eminent, hence there must be a first aid kit; 11. Only qualified and licenced personnel must be allowed to operate machinery and vehicles; 12. No employee must be allowed to be onsite without PPE; 13. Adequate safety signs must be displayed on site;		

Environmental / Social Impact	Objectives	Proposed Mitigation Measures	Monitoring Indicator	Party Responsible
		14. To avoid field fires, smoking is only permitted at designated sites with low risk to fire; 15. Do not allow illegal recyclers on site;		
Oil Leakages	Manage fuels, oils and lubricants leakages from Vehicles and Machinery to prevent pollution	1. Ensure all vehicle are well service and leak inspection are done; 2. Provide drip trays to stationary vehicle; 3. Servicing of vehicle must be done at an approve site; 4. Re-fuelling, oil replacement must be done on approved sites;	Physical verification and routine monitoring	Management or Site Manager
Hazardous waste	To prevent disposal of hazardous waste on site	1. Hazardous waste must NOT be disposed at the site. 2. Inform public on procedures on hazardous waste disposal	Visual inspection	Site Manager
Heritage Resources / artefacts	Preserve Heritage	1. Heritage, human remains or artefacts find must immediately be cordoned off and reported to the National Museum (+264 61 276800) or the National Forensic Laboratory (+264 61 240461). 2. No artefacts must be removed or be interfered with prior to authorisation from the Namibian National Heritage Council (NHC)	Sighting report/s of heritage resources / artefacts	Management or Site Manager

Chapter 5. Closure / Decommissioning Plan

5.1. Decommissioning procedures

These procedures have been adapted from M. Ryan's guidelines issued in December 2009 for the closure of non-containment municipal solid waste landfill sites. The Eenhana Waste Disposal Site falls into this category, as it is a non-containment facility that has been operated using basic waste management practices such as filling and compaction. The site lacks an engineered base layer and does not include any form of leachate collection or drainage system.

Given these conditions, the closure plan places primary emphasizes on three key components:

- Thorough site clean-up;
- Installation of a final capping system to minimize precipitation infiltration, reduce leachate generation, and control landfill gas emissions; and
- Implementation of a long-term environmental monitoring and site management program.

These measures aim to minimize environmental risks, prevent surface water infiltration, control gas emissions, and ensure the site remains stable and safe over time.

5.1.1. Site Clean-Up

The initial stage in closing the waste disposal site is thorough clean-up. Prior to final filling and compaction, recyclable materials should be removed from the waste stream. To reduce the overall waste volume, it is recommended that combustible waste be burned in a controlled manner, especially during calm weather to prevent smoke dispersion. Although open burning is not a preferred method, a single controlled burn may be acceptable, provided that residents in nearby households are informed in advance.

During the site clean-up process, the following steps must be undertaken:

i. **Provision of Personal Protective Equipment (PPE):** All workers must be equipped with adequate PPE to protect against injuries from sharp objects, broken glass, vermin, and potential disease exposure.
ii. **Removal of Recyclables:** Materials such as scrap metal and other recyclable items should be removed and taken for recycling.

iii. **Fence and Perimeter Cleaning:** All waste adhered to perimeter fencing or found in the surrounding area must be collected and returned to the waste disposal area.

iv. **Hazardous Waste Handling:** If any hazardous materials are identified, they must be removed and properly disposed of at a licensed hazardous waste facility.

v. **Rubble Reuse:** Construction and demolition rubble found outside the disposal site should be collected and repurposed for use during the compaction phase.

5.1.2. Site Grading and Compaction

The waste disposal site includes excavated areas, some of which were never fully utilized for waste placement. During the site assessment, it was observed that certain sections contain scattered waste and have not undergone compaction. To maintain a minimal site footprint and ensure uniform ground levels, the following steps are required:

i) **Waste Relocation**: Scattered waste must be collected and relocated to previously compacted areas.

ii) **Waste Compaction**: Use machinery, such as a bulldozer, to compact the waste thoroughly.

iii) **Site Grading:** The site must be shaped and graded to achieve an even and stable ground surface.

5.1.3. Final Cover

The final cover must be installed to minimize water infiltration and isolate the waste from the environment. The process includes;

i. **Covering with Overburden Soil:** Utilize available overburden soil to cover the waste site. The soil must be compacted to form an impermeable surface, especially effective during rainfall. Clay or gravel/loam soils are recommended.

ii. **Surface Grading:** Ensure the final cover is graded to prevent surface ponding. A gentle slope must be achieved to allow smooth runoff and reduce the risk of water infiltration and leachate formation.

iii. **Topsoil Application:** After compaction, a topsoil layer of at least 60 cm must be applied to support vegetation growth.

iv. **Revegetation:** Introduce grass seed to promote fast vegetative cover, enhance soil stability, and reduce the risk of wind erosion.

5.1.4. Storm water control

Stormwater management is essential to prevent rilly erosion that may unearth compacted waste. The following measures are required:

i. **Diversion Structures:** Construct diversion channels or berms along the up-gradient sides of the site to redirect surface water away from the capped area.
ii. **Compacted Side Slopes:** Ensure the side slopes are compacted and shaped to facilitate efficient stormwater drainage.

5.1.5. Location records

The GPS coordinates of the site are provided in this document and must be retained permanently. In addition, permanent site boundary markers or beacons must be installed to serve as lasting references for future land use planning and monitoring.

5.1.6. Site Access after closure

To prevent unauthorized dumping after closure, strict access control measures must be implemented. While some community members may attempt to continue dumping out of habit, the following steps are recommended:

i. **Security Measures:** Install security personnel or systems to prevent illegal dumping and unauthorized entry.
ii. **Gate Management:** Ensure the site gates remain securely closed at all times.
iii. **Signage Installation:** Post clear signage at the entrance, including warnings such as “STOP,” “DANGER,” “NO ENTRY,” and “NO DUMPING,” along with details of applicable fines for violations.
iv. **Public Information:** Install an informational placard at the entrance, indicating the location and operational status of the new waste disposal site.

5.1.7. Summary of the site closure

Upon the approval of this closure plan, a summary report outlining all decommissioning and rehabilitation activities must be submitted to the Ministry of Environment and Tourism (MET). Following submission, a joint site inspection must be conducted in collaboration with MET officials to verify closure compliance.

5.1.8. Site Monitoring

Although this is a non-containment site and leachate is not visibly present, ETC must implement a groundwater monitoring program as a precautionary measure. It is recommended that at least one groundwater monitoring well be installed to monitor water quality and groundwater levels on an ongoing basis. The well must be installed on the down slope of the site

5.1.9. Future use of site

ETC plans to repurpose the closed waste disposal site into a recreational green space. The area will be rehabilitated with the planting of carbon dioxide-absorbing tree species, contributing to environmental sustainability and community well-being.

Chapter 6. Conclusion and Recommendations

6.1. Conclusions

The Eenhana Waste Disposal Site has primarily been used for the disposal of household and domestic waste. There is no evidence to suggest that hazardous waste has been deposited at the site. Given its classification as a non-containment landfill, the absence of engineered environmental protection systems underscores the importance of a well-planned and carefully executed closure.

With the full and proper implementation of the EMP and the accompanying rehabilitation guidelines outlined in this document, the site can be successfully decommissioned and rehabilitated without posing a significant risk to the surrounding environment or public health. The proposed clean-up, final capping, stormwater control, and long-term monitoring measures are sufficient to ensure environmental safety and compliance with national waste management standards.

6.2. Recommendations

It is recommended that this EMP and Rehabilitation Plan be approved, subject to though not limited to the following conditions:

i) **Full Implementation of the EMP:** All environmental protection and mitigation measures outlined in the EMP must be strictly adhered to throughout the decommissioning and post-closure phases. This includes site clean-up, compaction, capping, stormwater control, and access restriction measures.

ii) **Establishment of a Groundwater Monitoring System:** A groundwater monitoring program must be implemented around the perimeter of the site. At least one monitoring well should be installed to assess groundwater quality, detect potential contamination, and ensure that no leachate migration occurs.

iii) **Bi-Annual Environmental Audits:** Environmental audits must be conducted at least twice per year. These audits should include, but not be limited to, groundwater quality analysis, inspections of the site's structural integrity, and verification of the effectiveness of the final cover and stormwater management systems.

iv) **Public Communication and Access Control:** Community awareness should be maintained through proper signage and public notices to discourage illegal dumping

after closure. Access to the site must be permanently restricted through physical barriers and security measures.

v) **Post-Closure Land Use Planning:** As per ETC's future vision, the site may be rehabilitated into a recreational or green space. Prior to this transition, a detailed post-closure land use plan should be submitted and approved by the relevant authorities to ensure the area is safe for public use.

Chapter 7. Annexes

7.1. Annex 1. Decline letter from EC office

REPUBLIC OF NAMIBIA

MINISTRY OF ENVIRONMENT AND TOURISM

Tel: (00 26461) 284 2111
Fax: (00 26461) 232 057

Cnr Robert Mugabe &
Dr Kenneth Kaunda Street
Private Bag 13306
Windhoek
Namibia

Ref: APP - 00275

18 October 2019

The Chief Executive Director
Eenhana Town Council
Private Bag 8007
Eenhana
Namibia

Dear Mr. Ndevashiya,

SUBJECT: APPLICATION FOR AN ENVIRONMENTAL CLEARANCE CERTIFICATE FOR THE OPERATION OF THE EXISTING WASTE DISPOSAL SITE FOR EENHANA TOWN COUNCIL, OHANGWENA REGION

The Ministry of Environment and Tourism (MET) acknowledges receipt of your application dated 19 August 2019 for the operation of the aforementioned project.

Due to significant environmental impacts that emanate from waste, the Environmental Management Act (EMA) no. 7 of 2012 listed, amongst others, waste management as one of the activities that should not be undertaken without an Environmental Clearance Certificate.

In light of the above, you are hereby notified that your application has been declined due to the current location of the existing waste disposal site, which is near the residential area as well as the airstrip. This could have a negative impact to the residents in close proximity to the site as well as compromise safe operation of the airstrip.

You are therefore advised to commence the rehabilitation process at this site and identify an appropriate new disposal site before the 30th of April 2020. Additionally, the new site should be approved by this Ministry before its operation.

MET will conduct random monitoring and inspection to ensure compliance to this effect.

Yours sincerely,

Fredrick Mupoti Sikabongo
DEPUTY ENVIRONMENTAL COMMISSIONER

MINISTRY OF ENVIRONMENT AND TOURISM P/Bag 13306 Windhoek, Namibia Office of the Deputy Environmental Commissioner

"Stop the poaching of our rhinos"

All official correspondence must be addressed to the Permanent Secretary

7.2. Annex 2: Response to EC office

Eenhana Town Council

OFFICE OF THE CHIEF EXECUTIVE OFFICER

Enquiries: MK Asser

25 November 2019

Dr. Fredrick Mupoti Sikabongo
DEPUTY ENVIRONMENTAL COMMISSIONER
Ministry of Environment and Tourism
Private Bag 13306
WINDHOEK

Dear Dr. Sikabongo,

RE: APPLICATION FOR AN ENVIRONMENTAL CLEARANCE CERTIFICATE FOR THE OPERATION OF THE EXISTING WASTE DISPOSAL SITE FOR EENHANA TOWN COUNCIL, OHANGWENA REGION

Reference is made to your letter dated 18 October 2019.

In your letter, you have stated and instructed Eenhana Town Council (ETC) to rehabilitate the existing waste disposal site and find a new site before or on 30 April 2019. I would like to bring to your attention that, a new site has been identified, surveyed and an Environmental Impact Assessment was done and submitted to your good office on 16 July 2019, application number, APP-00270. Our office is still waiting for the decision of your review.

Furthermore, ETC will not be able to meet your proposed timeline in commissioning the new landfill site . This is one of our capital projects that have financial implications and currently we do not have budget provision for the construction of the new site.

Eenhana Town Council would like to humbly request your good office to;

1. Consider and revise the timeline given and be given at least 36 months to construct the new landfill site looking at the budgetary provisions.
2. Allow the current waste disposal site continues to operate in accordance to the submitted EMP until a new wasted disposal site is commissioned,
3. Fast track the application for the proposed new waste disposal waste.

Chapter 8. References:

1. Department of Water Affairs and Forestry Rep of South Africa., (2015). Minimum Requirements for the Handling, Classification and Disposal of Hazardous Waste
2. Gesan G., (2009). Environmental Impact Assessment For A General Landfill Site And A Hazardous Waste Storage Facility In Lephalale, Limpopo Province
3. Hani A, Q., (2015) Environmental Impact Assessment of Municipal Solid Waste Landfills: A Case Study From Jordan.
4. Mendelsohn J, Jarvis A, Roberts C & T Robertson., (2002) Atlas of Namibia. A portrait of the land and its people. David Philip Publishers
5. Mendelsohn, J., Jarvis, A., Roberts, C. & Robertson, T., 2009. Atlas of Namibia. 3rd ed. Cape Town: Sunbird Publishers.
6. Ryan M., (2009). Guideline for the closure of No-Containment Municipal Solid Waste Landfill Site.
7. Silke Bertram and Carl Magnus Broman., (1999) Assessment of Soils and Geomorphology in central Namibia, Uppsala, March 1999-07-02 ISSN 1402-3237
8. Tholoana Sustainable Development and Environmental Consultants 2014., Final Environmental Impact Assessment Report For The Proposed Maluti-A-Phofung Landfill Site.
9. Tim W., (2016)., How to Decommission or Close an Open Dumpsite in an Environmental Sound Manner.
10. Zenas Engineering PLC., (2010). Dilla City Administration Landfill Site Environmental Impact Assessment Report.