

2025

**THE ENVIRONMENTAL MANAGEMENT PLAN FOR THE
OPERATION AND MAINTENANCE OF AN EXISTING 220KV
WALMUND – KUISEB AND 132 KUISEB – WALVIS BAY 1 &
2 TRANSMISSION LINES INCLUDING KUISEB AND
WALMUND SUBSTATIONS AND OTHER ASSOCIATED
INFRASTRUCTURES IN ERONGO REGION.**



This document is prepared by:

**Namibia Power Corporation (Proprietary)
Limited**

**NamPower Center 15 Luther Street, Windhoek
P.O. Box 2864, Windhoek, Namibia
Tel: +264 (61) 205 4111
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Ndapona, Martha



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1 LIST OF TERMS, ACRONYMS AND ABBREVIATIONS

EAP	Environmental Assessment Practitioner
ECC	Environmental Clearance Certificate
EIA	Environmental Impact Assessment
EMA	Environmental Management Act no 7 of 2007
EMP	Environmental Management Plan]
GIS	Geographical Information System
HIV/AIDS syndrome	Human immunodeficiency virus/ acquired immunodeficiency
MEFT	Ministry of Environment, Forest and Tourism
NHC	National Heritage Council
SHE	Safety, Health and Environment
SHEW	Safety, Health, Environment and Wellness
kV	Kilovolt

fields, gravel plains, rocky outcrops and drainage lines. The barchanoid dune fields and drainage lines crossed by the proposed line as well as a prominent outcrop located near the line; the entire line is located on gravel plains. All these habitats are considered sensitive due to the long time it takes to recover after a disturbance (Enviro Dynamics, 2012).

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

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

3 OBJECTIVES OF THIS ENVIRONMENTAL MANAGEMENT PLAN (EMP)

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

This EMP has the following objectives:

- To outline mitigation measures to be implemented during the operation phase, to manage and minimise the extent of environmental impacts.
- Minimise negative impacts and enhance positive impacts associated with the operations.
- To ensure that the operational activities do not result in undue or reasonably avoidable adverse environmental impacts and ensure that any potential environmental benefits are enhanced.
- To identify key personnel who will be responsible for the implementation of the measures, outline functions and responsibilities.

- To propose mechanisms for monitoring compliance and preventing long term or permanent environmental degradation.
- Create management structures that address the concerns and complaints of Interested and Affected Parties (I&APs) with regards to the operational activities.

4 POLICY AND LEGISLATIVE FRAMEWORK

Table 1 below outline the legislative requirements which are applicable to the operational activities.

Legislation:	Section (s) applicable:	Implications:
Environmental Management Act no 7 of 2007	The whole document applies.	All regulations applicable to different activities must be complied to.
EMA Regulations GN 28-30 (GG 4878) (February 2012)	The whole document applies.	All regulations applicable to different activities must be complied to.
No. 156 Labour Act, 1992: Regulations relating to the health and safety of employees at work.	All applicable Sections	All regulations applicable to different activities must be complied to.
Labour Act no 11 of 2007	All applicable Sections	All regulations applicable to different activities must be complied to.
Electricity Act no 4 of 2007	Section 33	Installations used for the provision of electricity should be operated with due compliance with the requirements of laws relating to health, safety, and environmental standards. Therefore – any company involved within the Electricity Supply Industry must adhere to the laws covering the previously stated aspects or stand to lose their licenses to operate.

Water Act no 54 of 1956	• Section 21 and 66 • Section 23 • All other sections applicable to different activities.	• Conditions in terms of the disposal and management of effluent are to be adhered to. • Any person causing pollution to a water source shall be guilty of an offence.
Public and Environmental Health Act no 1 of 2015	• Section 52 • Section 53 • All other sections applicable to different activities.	• A person generating waste must ensure that the waste generated is kept and stored under conditions that cause no harm to human health or damage to the environment. • Waste must only be disposed of at a waste disposal site, including an incinerator approved by the local authority concerned.
Water Resources Management Act no 24 of 2013	• Section 89 • All other sections applicable to different activities.	• The owner or occupier or other person in control of land where an incident that causes or is likely to cause a water resource to be polluted must take all reasonable measures to contain and minimize the effects of the incident; and to clean up polluted areas and remedy the effects of the incident.
Hazardous Substances Ordinance 14 of 1974	• Section 27 • All other sections applicable to different activities.	• To provide for the control of substances which may cause injury or ill-health to or death of human beings, by reason of their toxic, corrosive, irritant,

		strongly sensitizing or flammable nature or the generation of pressure thereby in certain circumstances. • To provide for the division of such substances into groups in relation to the degree of danger. • To provide for the prohibition and control of the importation, manufacture, sale, use, operation, application, modification, disposal or dumping of such substances; and • To provide for matters connected therewith.
Fertilizers, farm feeds, agricultural remedies and stock remedies Act no 36 of 1947	• Definitions • Section 7 • Section 10 • All other sections applicable to different activities.	• Arborocide application is defined as an agricultural remedy under this Act. • Only registered pesticide may be used. • May only buy herbicides in a container that complies with the prescribed requirements and is sealed and labelled. • Only allowed to use herbicides in the prescribed manner. • Landowners must be notified about applications, and the following information must be supplied:

		○ Purpose of administration ○ Registered name and number of the product ● Precautions to be taken before, during and after each administration.
The Nature Conservation Ordinance (1975) as amended through the Nature Conservation Amendment Act of 1996.	● Chapter 11: Game Parks, Nature Reserves, Conservancies and Wildlife Councils	● Permits are required to enter the Namib Naukluft and Dorob National Park. Permits are also required for the removal of any protected plant or tree. It also stipulates that no damage may be done to any object of geological, ethnological, archaeological, historical, or other scientific interest without the appropriate permits.
National Heritage Act No 27 of 2004	● Section: 46, 48, 55 ● All other sections applicable to different activities.	● All heritage resources are to be identified and either protected or removed/mitigated with a permit from the National Monuments Council before any development may take place. ● A chance find procedure should be followed in case of discovery of a heritage resource.

5 ROLES AND RESPONSIBILITIES

It is the responsibility of NamPower and/or contractor to ensure that all the environmental management actions are conducted effectively and timeously. It is important to note that the

successful implementation of the EMP is, however, dependent on clearly defined roles and responsibilities by several stakeholders. Below are the key employees that are responsible for the management of environmental and social issues during the operational phase:

Table 2: The roles and responsibilities for operational activities:

Responsible person	Responsibilities
The Area Superintendent	• Is responsible for the enforcement of the EMP • To ensure that environmental requirements are adequately covered in any external service provider contracts. • To ensure that SHE requirements are included in the tender documents sent to the contractors. A copy of this EMP should also form part of the tender documents. • To ensure that corrective actions are implemented for non-compliances. • To ensure that appropriate records and information regarding compliance with environmental requirements are maintained. • To ensure that the stations and lines remain in compliance with the requirements of this EMP, through regular communication and monitoring. • To ensure that all incidents, accidents and complaints are reported to the project manager. The contractor to ensure that incidents and accidents are investigated to prevent re-occurrence.
Project Manager	• Is responsible for the enforcement of the EMP. • To ensure that SHE requirements are included in the tender documents sent to the contractors. • Must ensure that the contractor remains in compliance with the requirements of this EMP.
NamPower SHEW	• To ensure that all requirements with regards to this EMP are

	fulfilled. • To assist the Project Manager in ensuring that the contractor remains in compliance with this EMP. • Communicate NamPower SHEW requirement to the contractors and NamPower employees. • Request NamPower sections and contractors to submit SHEW files prior to any activity taking place for approval. • Provides SHEW inductions to NamPower and contractor employees. • Implement monitoring and conduct audits in consultation with the Project Manager. • Document and communicate monitoring, audit and inspection findings to project manager and area superintendent. • Communicate the final inspection report to the Project manager on contractor compliance to the EMP before the project close-off and final payment is made to the contractor.
Contractor	• Is responsible for the implementation of the EMP • To appoint an Environmental officer responsible for the implementation of this EMP. • To ensure that all tasks undertaken under the scope of work, are in accordance both with NamPower's SHEW policies and procedures as well as to the requirements of this EMP. • Ensure that employees are regularly trained and awareness built relating to environmental and social management. • To ensure that all incidents, accidents and complaints are reported to the project manager. The contractor to ensure that incidents and accidents are investigated to prevent re-occurrence. • Ensuring that all employees receive a SHEW induction before

	the start of the project. Ensuring that the work being done does not create a nuisance to any being working, residing or living on adjacent properties or within the immediate surroundings of the site.
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6 DESCRIPTION OF OPERATIONAL ACTIVITIES TO BE UNDERTAKEN AND ASSOCIATED IMPACTS

The table below outlines the summary of the operational activities and associated socio-economic and environmental impacts.

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

Activity	Description	Associated potential impacts
General functioning of the station and transmission line.	Physical presence and functional characteristics of the station and associated line.	- Animal (including birds) mortalities through collisions and electrocution. Especially wetland birds such as the Great White Pelicans, Greater and Lesser Flamingos found in the area of Walvis Bay Sewerage Ponds. - Visual impact. - Community impacts in a form fatalities or injuries caused by electrocution. - Reduction in the conservation value of the national parks. - Meeting electricity demand (positive impact).
Maintenance of the station and line	- The maintenance of the station and line entails: - General equipment	- Soil and water contamination - Waste generation

	repairs. • Replacement and servicing of batteries. • Maintenance of electrical equipment such as transformers, relays and capacitors. • Maintenance of electrical equipment such as transformers, relays and capacitors. • Replacement, cleaning and maintenance of station and line components. • Construction or repairing of access roads.	• Loss of biodiversity • Social issues related to the introduction of new workers in the area, e.g. HIV/AIDS spreading • Damage to biological crust on gravel plains
Construction	• Construction includes not limited to the following activities: • Construction or refurbishment of buildings (digging and setting of foundations, digging of cable trenches and other activities) . • Installation or extension of boundary fences • Upgrade of electrical equipment (either in size, capacity or technology).	• Noise emissions • Dust emissions • Introduction of new people in the area leading to the spread of diseases such as HIV/AIDS • Soil and water contamination • Waste generation • Employment of casual workers • Loss of biodiversity reduces habitat availability and food sources for many animals. • Loss of biological soil crusts

	• Personnel conduct in surrounding communities.	• Loss of sensitive plants and habitats.
Periodic inspections and monitoring	• Conducting inspections and monitoring.	• Soil and ground water contamination as a result of oil spills • Soil contamination as a result of improper waste handling and disposal. • Loss of biodiversity if existing access roads are not put to use.
Hazardous Substances	• Storage of hazardous material.	• Possible oil spills and soil contamination from electrical units such as transformers.
Installation of Optic Fibre networks	• Design, Supply, Delivery, Installation and Commissioning of Optic Fiber networks for communication purposes.	• Loss of biodiversity • Soil contamination because of improper waste handling and disposal. • Loss of biological soil crusts • Loss of sensitive plants and habitats.

7 MANAGEMENT AND MITIGATION MEASURES

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

Table 4: Proposed mitigation measures for the general operational activities

ASPECT	MANAGEMENT AND MITIGATION MEASURES/COMMITMENTS	RESPONSIBLE PERSON
Safety Health and Environmental (SHE) Awareness	• All employees should undergo SHE induction before work commences onsite. • All employees are to be made aware of their individual roles and responsibilities in achieving compliance with the EMP. • SHE toolbox talks to be conducted by the contractors and records to kept onsite. • Warning signs must be placed on and around the site.	• Area superintendent • Project manager • Contractor
Safety Management	• Develop and implement an occupational health and safety system that comprises key elements such as risk assessment and safe working procedure. • All work activities to be done under the supervision of a competent person. • Anti-climbing devices should be installed on transmission towers and be maintained. • Appropriate warning signs must be placed on the facilities.	• Area superintendent • Project manager • Contractor
Fire Management	• Eliminating the presence of potential sources of ignition and providing appropriate equipment to minimize fire risk.	• Area superintendent • Project manager

ASPECT	MANAGEMENT AND MITIGATION MEASURES/COMMITMENTS	RESPONSIBLE PERSON
	• Fire extinguishers to be readily available onsite, especially when hot works are conducted. • Regular servicing of fire extinguishers.	• Contractor
Air Quality	• Dust generation from all activities must be minimised wherever possible. • Excavation, handling and transportation of erodible materials shall be avoided under high wind conditions or when a visible dust plume is present. • Speed limit to be enforced to control dust emissions. • Dust suppression measures shall be implemented when necessary. • Vehicle, machinery and equipment shall be maintained in good working order to minimise exhaust fume emissions.	• Area superintendent • Project manager • Contractor
Resources Efficiency	• Minimise water wastage and record water usage. • Avoid wasteful use of materials. • Source goods and services locally where possible	• Area superintendent • Project manager • Contractor
Waste Management	• Minimise the generation of waste by applying the waste hierarchy.	• Area superintendent

ASPECT	MANAGEMENT AND MITIGATION MEASURES/COMMITMENTS	RESPONSIBLE PERSON
	• Station and line servitude to be kept free of waste. • No burning, burying or dumping of any waste materials shall be permitted onsite. • Labelled waste bins with lids must be provided at substations/campsites for all waste streams and ensure that waste is disposed at nearest approved waste disposal site. • Ensure that waste segregation is done at source. • Hazardous waste shall be disposed of at a registered hazardous waste disposal site. • Safe disposal certificates for hazardous waste must be kept in the SHE files. • Concrete waste must not be dumped on site.	• Project manager • Contractor
Wastewater management	• Water containing environmental pollutants shall be collected and removed from site. • No wastewater runoff or uncontrolled discharges from the site/working areas shall be permitted. • Mobile toilets or septic tanks should be used in remote areas especially at	• Project manager • Contractor • Area superintendent

ASPECT	MANAGEMENT AND MITIGATION MEASURES/COMMITMENTS	RESPONSIBLE PERSON
	Walmund and Kuiseb Substations.	
Hazardous Substances	• The use, handling, storage and disposal of the hazardous chemical must be in accordance with the MSDS. • Containers must be clearly marked to indicate contents and quantities. • Hazardous substances storage areas must be bunded. A bund should be able to contain 110% of the volume of the largest container stored within it. • All transformers to be contained in bunded areas. • Diesel and other liquid fuel, oil and hydraulic fluid must be stored in appropriate storage tanks or in bowzers with secondary containment. • Inspect and maintain hazardous storage areas and bund walls to avoid overflows. • Report any accidental spills that occur onsite. • Spill kit and absorbents must be available onsite at substations. • Hazardous substance storage areas must display safety symbolic signs. • All spills must be reported, cleaned and remediated to in compliance with	• Area superintendent • Project manager • Contractor

ASPECT	MANAGEMENT AND MITIGATION MEASURES/COMMITMENTS	RESPONSIBLE PERSON
	SHEW requirements.	
Social Impact	• Employees should limit their contact with permanent residents of the area. • Employees should be properly educated about the impact of HIV / AIDS and pregnancies. • The use of intoxicating liquor or drugs of any kind by the employees is strictly prohibited. • Ensure that all queries and complaints are documented and dealt with. • A register shall be kept of all complaints from landowners. • All claims shall be handled immediately to ensure timely rectification.	• Area Superintendent • Project Manager • All NamPower employees • Contractor
Archaeology	• Should a heritage site or archaeological site be uncovered or discovered during the operation phase, a “change find” procedure in appendix 1 should be applied. • Any chance finds must be reported to NamPower environmental section. • In an event of discovery of human remains or other artefacts the work shall cease. A professional archaeologist is to be consulted and carry out	• Area superintendent • Project Manager • SHEW • Contractor

ASPECT	MANAGEMENT AND MITIGATION MEASURES/COMMITMENTS	RESPONSIBLE PERSON
	investigation.	
Fauna and Flora	• Ensure that the site is kept clean and free of rubbish that could potentially attract animals and pests • No harvesting of plants is allowed. • Poaching or capturing of any animal (wild or domestic) shall be prohibited. • Obtain the national park entry permit and ensure compliance to permit conditions at all times. • Bird nests may not be disturbed unless interfering with the normal operation of the lines/stations. • No domestic animals may be kept onsite site as they can introduce diseases or interbreed with the animals occurring naturally in the area. • Monitor bird collisions develop and implement additional mitigation measures where required. • All wildlife and electrical infrastructure interactions must be reported to the SHEW section. • Vehicles driving along the lines should engage four-wheel drive to prevent	• Area superintendent • Project Manager • SHEW • Contractor

ASPECT	MANAGEMENT AND MITIGATION MEASURES/COMMITMENTS	RESPONSIBLE PERSON
	spinning and consequent impacts on fragile desert surfaces. - Existing tracks must be utilised. - Using a combination of double loop bird flight diverters (BFDs) and "flight diverter flags" the line should be marked for the section crossing the three drainage lines between Kuiseb Substation to the Walmund Substation. The marking should be carried out for at least five spans each centred on the following co-ordinates: 22 46 49S, 14 43 57E; 22 50 14S, 14 43 39E; and 22 53 59S, 14 43 30E. - Conduct bird surveys to document bird mortalities and to assess the effectiveness of the bird diverters.	
Water Resources	- Care must be taken to ensure that pollution of water does not occur. - Naturally occurring water resources may not be used for any personal hygiene. - Water may only be taken from a private or government property based on an agreement between the NamPower, contractor and custodian of the water source.	- Area superintendent - Project Manager - SHEW - Contractor

ASPECT	MANAGEMENT AND MITIGATION MEASURES/COMMITMENTS	RESPONSIBLE PERSON
Campsite Establishment	- NamPower/ Contractor must sign land permission form and agreement with landowners prior to commencement of work onsite. - Adequate ablution facilities must be provided onsite in relation to the number of employees. - Ablution facilities must not be located within 100m of any river, stream channel, pan, dam or borehole - Non-employees are not allowed to reside at the campsite. - Fire extinguishers, first aid kits, assembly point, and emergency numbers must be available onsite. - Waste must be managed in accordance with waste management requirements outlined in this EMP and/or contractor's SHE plan.	- Area superintendent - Project Manager - SHEW - Contractor
Site Rehabilitation	- Progressive rehabilitation when project work is in progress. Post project rehabilitation must also be done. All materials, equipment and waste must be removed from site. - An audit prior to the contractor leaving site must be conducted. Non – conformance to be rectified before the contractor/project team leave the site.	- Area superintendent - Project Manager - SHEW - Contractor

ASPECT	MANAGEMENT AND MITIGATION MEASURES/COMMITMENTS	RESPONSIBLE PERSON
Emergency response	• All possible emergencies must be identified • Emergency preparedness and response plans for the identified emergencies must be prepared and communicated to all relevant stakeholders. • District personnel or any other person conducting work on the lines must have emergency numbers such as for fire brigades, ambulance services, hospitals, police, snake and bee catchers.	• Area superintendent • All district personnel • Project Manager • Contractor

8 REPORTING, MONITORING AND AUDITING

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

9 NON-COMPLIANCE AND CONFLICT MANAGEMENT PROCEDURES

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

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

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

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

10 RECORD KEEPING

Record keeping is important for the effective functioning and implementation of an EMP. EMP documentation must be kept in both the hard copy and electronic format for safe keeping. These

must include:

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

11 CONCLUSION

All management measures and legal requirements outlined in this EMP should be implemented to ensure environmental compliance by all parties undertaking the operational activities. This will ensure that potential negative impacts are identified, avoided or mitigated and positive impacts are enhanced.

12 ANNEXURES

Annexure 1: Chance find procedure

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

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

Procedure:

Action by person identifying archaeological or heritage material

- a) If operating machinery or equipment stop work
- b) Identify the site with flag tape
- c) Determine GPS position if possible
- d) Report findings to foreman

Action by foreman

- a) Report findings, site location and actions taken to superintendent
- b) Cease any works in immediate vicinity

Action by superintendent

- a) Visit site and determine whether work can proceed without damage to findings
- b) Determine and mark exclusion boundary
- c) Site location and details to be added to project GIS for field confirmation by archaeologist

Action by archaeologist

- a) Inspect site and confirm addition to project GIS
- b) Advise NHC and request written permission to remove findings from work area
- c) Recovery, packaging and labelling of findings for transfer to National Museum

In the event of discovering human remains

- a) Actions as above
- b) Field inspection by archaeologist to confirm that remains are human
- c) Advise and liaise with NHC and Police
- d) Recovery of remains and removal to National Museum or National Forensic Laboratory, as directed