

ENVIRONMENTAL ASSESMENT FOR THE FOR THE PROPOSED TELECOMMUNICATION TOWER IN BLOCK D (ECHO AREA) REHOBOTH-HARDAP REGION

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN

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CONSULTANT: D&P ENGINEERING AND ENVIRONMENTAL CONSULTANT

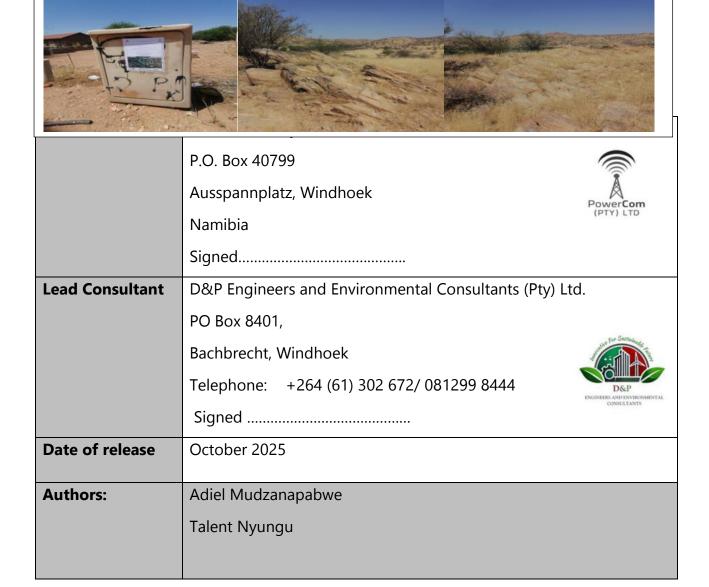


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DEFINITIONS

TERMS	DEFINITION					
BID	Background Information Document					
EAP	Environmental Assessment Practitioners					
ECC	Environmental Clearance Certificate					
ECO	Environmental Control Officer					
EIA (R)	Environmental Impact Assessment (Report)					
ESIA	Environmental and Social Impact Assessment					
EMP	Environmental Management Plan					
EMPr	Environmental Management Plan Report					
GHG	Greenhouse Gasses					
ISO	International Organization for Standardization					
I&Aps	Interested and Affected Parties					
MEFT: DEA	Ministry of Environment, Forestry and Tourism's Directorate of					
	Environmental Affairs					
NHC	National Heritage Council					
NEMA	Namibia Environmental Management Act					
ToR	Terms of Reference					
UNFCCC	United Nations Framework Convention on Climate Change					

1. CHAPTER ONE: BACKGROUND

1.1. Introduction

POWERCOM (PTY) LTD herein referred to as the proponent has identified different areas that need improved communication alternatives in Namibia due to the growth in population and economic activities. To achieve the objective of improved telecommunication connectivity, POWERCOM has been appointed by Telecom Namibia, a sister company to establish telecommunication towers across different locations countrywide and Echo area in Rehoboth Block D is one of the location that has been identified. The development is earmarked to expand connectivity, decongest connectivity and promote ICT.

However, the telecommunication towers cannot be constructed without prior consent from interested and affected parties as well as obtaining an Environmental Clearance Certificate for development. In this respect, D&P Engineers and Environmental Consultants cc has been appointed as an Environmental Assessment consultant to carry out an Environmental and Social Impact Assessment study to obtain an environmental clearance certificate as per the requirements of the Environmental Management Act No. 7 of 2007 and Namibian Environmental Impact Assessment Regulations of 2012 in terms of telecommunication infrastructure.

1.2. Legal or compliance requirements

As per the requirements of the Environmental Management Act No. 7 of 2007 and the Environmental Assessment regulations of 2012, POWERCOM has appointed D&P Engineers and Environmental Consultants (DPEE) to conduct an Environmental Assessment (EA) and develop an Environmental Management Plan (EMP) for the proposed tower establishment. Therefore, this report presents the EMP which has been undertaken in accordance with these requirements. As such, key requirements in accordance with this Act classifies the proposed project as listed and invoke the need for an environmental management plan to sustainably implement this project. However, legal compliance is not only limited to the EMA, but also applies to all applying legal requirements identified in the ESR. When licenses are required, the proponent should ensure that all licenses and permits are obtained and fulfilled as per conditions.

In accordance with the two acts stipulated above, the application for the Environmental Clearance Certificate (ECC) will be obtained from the Ministry of Environment, Forestry, and Tourism (MET): Directorate of Environmental Affairs (DEA) before the project can proceed. In this respect, this document forms part of the application to be made to the DEA's office for an Environmental Clearance certificate for the proposed telecommunication tower at Block D of Rehoboth, in accordance with the guidelines and statutes of the Environmental Management Act No.7 of 2007 and the environmental impacts regulations (GN 30 in GG 4878 of 6 February 2012).

1.3. Other Legislation And Conventions

In addition to the Environmental Assessment Policy and the Environmental Management Act, the following additional pieces of existing or pending legislation and conventions may have some bearing on the proposed project:

The socio-economic environment

- Atomic Energy and Radiation Protection Act (2005)
- Communal Land Act (2002)
- Decentralisation Policy (1998)
- Hazardous Substances Ordinance (1956)

- International Atomic Energy Agency Non-proliferation Treaty (1970)
- Labour Act (1992)
- National Employment Policy (1997)
- National Heritage Act (2004)
- Pending Minerals Safety Bill
- Public Health Act (1919)
- Regional Councils Act (1992) as amended
- Road Traffic and Transport Act (1999)
- Traditional Authorities Act (1995)
- War Graves and National Monuments Amendment Act (1986)

The biophysical environment

- Air Quality Act (2004)
- Atmospheric Pollution Prevention Act (1965)
- Atmospheric Pollution Prevention Ordinance (1976)
- Convention on Biological Diversity (2000)
- Convention to Combat Desertification (1997)
- Forestry Act (2001)
- Minerals Policy of Namibia (2003)
- Namibian Water Corporation Act (1997)
- Nature Conservation Ordinance (1975) and Nature Conservation Amendment Act (1996)
- Pollution and Waste Management Bill (draft)
- Ramsar Convention (1975)
- Soil Conservation Act (1969)
- United Nations Framework Convention on Climate Change (1992)
- Water Resources Management Act (2004)

2. CHAPTER TWO: PROJECT DESCRIPTION AND LOCATION

2.1. Project Location

The proposed tower is to be erected at Block D- Rehoboth town in Hardap Region at coordinates, (23°19'50.96"S 17°04'10.29"E) The site is located in the newly established Block D residential area near Acho in Rehoboth. Block D is on the Western side of Rehoboth town. Figure 1 below shos the Locality map.

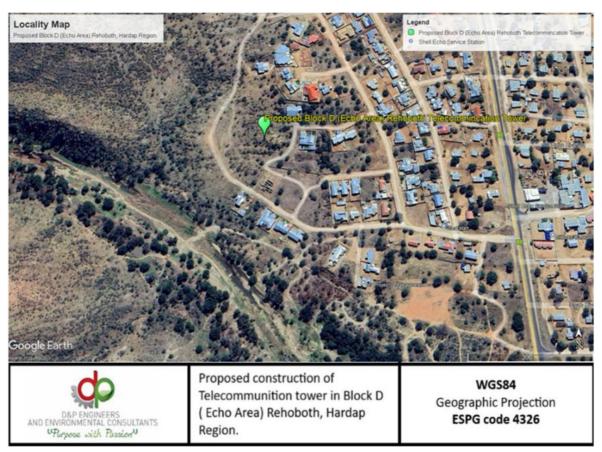


Figure 1: Site Locality, arial photography, Proposed 30-meters lattice Telecommunication Tower.

2.2. Description Of The Environment

Rehoboth's vegetation primarily consists of savanna, with a transition from highland shrubland to dwarf shrub savanna and Southern Kalahari grasslands with scattered trees. The semi-arid region receives about \((250\)) mm of annual rainfall, and dominant species include various Acacia species, such as Acacia erioloba and Acacia hebeclada.

The proposed tower is to be erected to the Western direction of Block D on a hilly, rocky top. Project site is about 250 meters away from the nearest house. The site supports little to no shurubs and tufted grass as shown in figure 2 overleaf.



Figure 2: Project site view

2.3. Description and Design of the project

TELECOM Namibia's information and technology infrastructure development subsidiary, POWERCOM (Pty) Ltd is on a drive of construction network towers across the country. POWERCOM targets that, other than improving internet and voice connectivity in the regions, there is also a need to increase the company's footprint and asset base to best service ICT stakeholders and offer better connectivity in all regions of the country. POWERCOM aims at providing different telecommunication service providers in Namibia with ready-to-use infrastructure as well as expanding network coverage into the different areas where there is weak or no network connectivity at all. Behind this backdrop, POWERCOM identified areas that need improved network connectivity that is currently not serviced with telecom network. The applicant, POWERCOM Pty Ltd intends to develop a telecommunication tower in Rehoboth Block D. . The tower development will include the following:

- The project entails the construction of a 30m Lattice tower with a footprint size of a 14m x 14m;
- Boundary fence to protect the tower from vandalisms and livestock and to limit public access to it;
- The site is to accommodate TN Mobile service and other service providers.
- A locked gate, to control access to the area and the antenna support structure.



Figure 3: Typical 30-meter lattice telecommunication tower structure and form (visual purposes only)

3. CHAPTER THREE: ENVIRONMENTALAND SOCIAL MANAGEMENT PLAN (ESMP)

3.1. Purpose of The Environmental and Social Management Plan (ESMP)

This EMP has been developed for the proposed establishment of a telecommunication tower at block D of Rehoboth. It forms the operational framework within which the proposed project is to operate within. All anticipated environmental and social impacts identified in the environmental scoping report are addressed, with a mitigation action, monitoring requirements, key indicators, and responsibilities. The purpose of this document is therefore to guide environmental management throughout the following lifecycle stages of the proposed development, namely planning and design, construction, operation, and maintenance. All this life-cycle has been addressed in this ESMP This ESMP is continuous, and it requires compliance monitoring, updating, and or amendment if the scope of operations changes. All personnel working on the project will be legally required to comply with the standards set out in this ESMP.

Furthermore, this section describes the Environmental and Social Management Plan (ESMP) for impacts associated with the proposed development. The ESMP stipulates the management of environmental programs in a systematic, planned, and documented manner. It includes the organizational structure, planning, and monitoring for environmental protection at the proposed farm area development and other areas of its influence. The aim is to ensure that the proponent maintains adequate control over the project operations to

- To prevent negative impacts where possible;
- Reduce or minimize the extent of impact during the project life cycle;
- Prevent long-term environmental degradation;
- Ensure public safety and health are protected

3.2. ESMP Administration

There is a strong need to clearly outline the roles and responsibilities of all stakeholders to ensure that the ESMP is fully implemented. To ensure that the ESMP is effectively implemented, the consultant also recommends that MET: DEA also conduct regular inspection visits on-site to enforce conducting of quarterly and biannual reports. Furthermore, there is also a need for the proponent to appoint an overall responsible person (project manager) to ensure the successful implementation of this document.

3.3. Roles and Responsibilities

Table 1: EMP IMplementation-Roles and Responsibilities

ROLE	ENVIRONMENTAL RESPONSIBILITIES
Powercom Pty Ltd (Site Acquisition	Responsible to enforce EMP implementation during construction and operation phases.
Manager)	
Environmental Control Officer (ECO)	Implement, review and update the EMP.
	• Ensure all reporting and monitoring required under EMP is undertaken, documented, and distributed as needed
	Conduct environmental site training (toolbox talks) and inductions with the support of an environmental consultant.
	Conducts environmental audit at the work site with the support of an environmental consultant.
	Close out all non-conformances.
	Ensure materials being used on site are environmentally friendly and safe.
The Directorate of Environmental Affairs	Approve the EMP and any amendments to the EMP.
	Approve reports of environmental issues and non-conformances as issued.
	Review and approve environmental reports submitted as part of EMP implementation
	Ensure that the client is compliant with the EMP through biannual reporting on environmental performance.
Project Manager (Site Engineer)	Control and monitor actions required by the EMP.
	Report all environmental issues to HSE Manager.
	Ensure documented procedures are followed and records are kept on site.
	Ensure any complaints are passed on to the management within 24 hours of receiving the complaint.
Contractor	Follow requirements as directed by the EMP when conducting work.
I	• Report any potential environmental issues to the site engineer/project manager, indicating spilled oil, excess waste,
I	excessive dust generation, dirty water running off the site, and other possible non-conformances

3.4. Planning and design

Table 2: Planning and Design Management Actions

Aspect	Management Requirement	Responsibility	Timeframes
Tower Design	 The design standards to be applied for the Tower should comply with the internationally accepted public exposure guidelines. The tower design should comply with the aesthetic guidelines for similar structures 	Proponent	Pre-construction phase
Labour Recruitment	It is anticipated that POWERCOM will utilize its own workforce. However, should there be the need to employ an extra person(s), especially for unskilled labour, it is highly recommended to recruit local people from Block D.	Proponent	Ongoing
Surrounding property owners	Consent letters are to be obtained from the property owner before construction.	Proponent	Pre-construction phase
Construction schedule	A convenient construction work/schedule should be prepared and shared with the surrounding property owners. This will ensure that the surrounding property owners are aware of when to expect the construction team at the site.	Proponent	Pre-construction
Compensation of land	There needs to be a clear agreement between POWERCOM and the land owners if they will be compensated for the piece of land used before construction starts.	Proponent	Pre-construction

3.5. Construction and Operation

Table 3: Construction and Operation EMP (C&O EMP)

Impact	Description	Effects	Class	Time frame	Responsibility	Action	Phase	
Noise pollution	Noise will be generated through:	The health of working personnel could be disturbed.	Environmental	1-2 months	Environmental Control Officer	A construction interval will be established, used, and adhered to.	Construction & Operation	
	Construction activitiesMoving vehicles.	Block D residents could be disturbed by the noise.			Site Manager	Workers will be issued earplugs to protect them from excessive noise.		
		General annoyance Driving away local animals species				The public will be notified through a printed timetable stating planned operational activities.		
		near the project site				Construction activities will be conducted during the daytime.		
						Site notices will be erected on, around the site- notifying visitors, and nearby residents of different hazards on site.		
						Areas marked as sensitive environments, especially for birds, need to be avoided during construction and operation.		
Dust Generation	Dust will accumulate because of the land preparation, onsite	This can lead to respiratory illnesses, especially among those working in the area.	Environmental	1-2 months	Environmental Control Officer	Dust suppression will be done by watering dust source surfaces.	Construction & Operation	
	movements of vehicles and machines, wind blowing on loose material	General air pollution.			Site Manager	Watering down dusty surfaces, Ensure that protective equipment such as		
	during construction, and tipping.	Nuisance to nearby residents The process can also drive away wild				respirators are distributed to employees, and ensure their use.		
		animals within the project area's surroundings				Site notices are to be erected on and around the site to inform visitors and surrounding residents to minimize their speed around the site area.		

Impact	Description	Effects	Class	Time	Responsibility	Action	Phase
				frame			
Soil	Excavation and land	Disturbance to the soil leaving the soil	Environment	Constru	ECO	Effort should be made to to return the topsoil that	
disturbance	clearing to enable	exposed and vulnerable to erosion		ction		was stripped from certain site areas	
	erection of project					All and the transfer of the second of the se	
	structures and installation of services					All possible trenches excavated for construction on site should be rehabilitated and	
	OI SEIVICES					returned to their pre-excavation state as far as	
						possible.	
						Soils that are not within the intended footprints	
						of the site areas should be left	
						undisturbed and soil conservation implemented	
						as far as possible.	
						In an event that any of the substances	
						mentioned above, spill on the soil, the	
						contaminated soil should be cleaned up	
						immediately and dispose of in a designated	
						hazardous waste bin and transported to the	
						nearest approved landfill site. The	
Loss of	Vegetative plants on site	The clearing of vegetation will result in	Environmental	Constru	Environmental	Limit vegetation clearing strictly to the project	Construction
Biodiversity	will be removed	the breaking of the ecosystem		ction	Control Officer	footprint and avoid unnecessary clearing in	
		processes in the area.		phase	-Site Manager	surrounding areas.	
	Habitat destruction for					Clearly demarcate areas that must not be	
	both ground-dwelling					disturbed, such as wetlands, riparian zones, or	
	species and tree-dwelling species.	proposed project area.				areas with high biodiversity.	
	-Soil disturbance on and	The few small animals still habiting the				Where possible, use already disturbed or	
	around the site.	place such as small rodents and birds				cleared land for construction vehicle access	
		will be forced away.				routes	
						The ground disturbance will only be limited to the	
						boundary area to avoid affecting a large area.	

Impact	Description	Effects	Class	Time	Responsibility	Action	Phase
	·			frame	, ,		
						Upon completion of construction activities more	
						regreening of the construction footprint affected	
						area is recommended.	
						A local landscaper can be engaged.	
GhG	Green House Gasses	Global climate change	Environmental	Constru	Environmental	Adopt the use of ethanol-blended fuels wherever	Construction &
emissions	(GHGs) emissions will be			ction	Control Officer	necessary.	Operation
	produced from the	Air pollution		phase			
	following activities:				Site Manager	Design an operating system that cuts on fuel	
	Fuels combustion					consumption.	
	for (construction				Department of		
	vehicles and				Environmental	Use of solar energy systems during construction	
	equipment)				Affairs.	for lighting and other minor energy needs.	
	Ground						
	excavation						
	releases						
	phosphorus found						
	underground and						
	releases						
	particulate matter						
	into the						
10/2-4-	atmosphere.	Dellation from all anilla acculting from	Facility	0	Faciana	Francisco de la companya de la compa	
Waste	Construction and	Pollution from oil spills resulting from	Environmental	Constru	Environmental	Ensure that all waste from construction activities	
Generation	operation are associated with a lot of raw materials	the handling of various machinery		ction	Control Officer	is stored and contained in designated containers	
		used during the construction phase		phase	Cita Managar	and transported to an approved waste disposal	
	and activities that result in	Construction rubble ampty packaging			Site Manager	site.	
	pollution	Construction rubble, empty packaging containers/bags, and materials				Cogregate wests on site	
	The construction and	containers/bags, and materials remnants.				Segregate waste on site	
	The construction and maintenance activities	reminants.				Workers should be sensitized to dispose of	
	may generate e-waste	Pollution from sewage				waste in a responsible manner and not to litter	
	and this needs to be	1 onution from sewage				waste in a responsible manner and not to litter	
	disposed of sustainably.					The burriying and burning of waste should be	
	aloposed of sustainably.					discouraged anywhere on site or close to the	
						site, apart from authorized and approved waste	
						management site	
						management site	

Impact	Description	Effects	Class	Time	Responsibility	Action	Phase
				frame			
						Sewage waste should be managed as per the portable chemical toilets' manufacturer's instructions and regularly disposed of at the nearest treatment facility. Bulky waste such as building rubbles must be collected and disposed of for landfilling. Visual inspections and monitoring is advised	
Safety and Health risks	Construction related Safety and Health hazards	Injuries to workers such as Occupational dermatitis, slips and falls of humans and objects, musculoskeletal disorders, etc.	Health and Safety	Constru ction phase	ECO	Equip workers with Personal Protective Equipment (PPE), and provide training and induction on how to effectively use the PPE. Consumtion of alcohol should not be allowed by employees prior to or during working hours Secure vehicles, fuel storage area, equipment to prevent any harm or injuiry to workers and surrounding residents Provide platforms for briefings and meetings about possible safety and health hazards in the workplace Provide site signs warning and informing about different hazards on site.	Construction and operation
	Vehicular traffic use	Injuries to workers from movement of heavy trucks during construction	Health and Safety	Constru ction phase	ECO	Limit the transportation of construction materials, equipment and machinery Heavy truck loads should comply to with the maximum allowed limit while transporting materials and equipment/machinery	

Impact	Description	Effects	Class	Time	Responsibility	Action	Phase
iiipact	Description	Lifects	Class	frame	Responsibility	Action	Filase
				Hallie		Drivers of project and construction vehicles	
						1	
						should have a valid licence	
						Access roads should be equipped with	
						temporary road signs	
						Vehicles hould not be driven by drivers under the	
						influence	
						Safe loading/offloading areas should be	
						designated.	
	Electrical hazards	Fatalities and fires	Health and	Constru	ECO	Employees should be trained on electrical safety	Construction and
			Safety	ction		before working on-site.	Operation
			,	and		, and the second	
				operatio		Safety representatives with training on electrical	
				n		hazards and emergency management should be	
						stationed on-site always during construction	
						Common on one annayo aannig contentionen	
						Safety signs during construction and operation	
						should be put on site. No-go areas should be	
						labeled, and PPE specifications should be clear	
						to provide guidance to personnel.	
	Radiation (Non-Ionizing)	Carcinogenic consequences	Health	Perman	Environmental	Radiation is the emission of energy as	Operation
	radiation (Non-tonizing)	Carollogethe consequences	Ticaltii	ent	Control Officer	electromagnetic waves or as moving subatomic	Operation
			Social	Cit	Control Officer	particles and it is part of our everyday	
			Jocial		Site Manager	environment (Clegg et al, 2019).	
					Site Mariager	environment (Glegg et al,.2019).	
						Non-ionizing radiation encompasses both	
						natural and human-made sources of	
						electromagnetic fields, for example, electrical	
						power supplies and appliances are the most	
						common sources of low-frequency electric and	
						magnetic fields in our living environment (ITU-T,	
						2014).	

Impact	Description	Effects	Class	Time	Responsibility	Action	Phase
				frame	,		
						The contractors to be installing the transmission	
						are required to put on appropriate PPE to protect	
						them from possible radiation.	
						'	
						Provisions of the Atomic Energy and Radiation	
						Protection Act, 2005 (Act No. 5 of 2005) should	
						be effectively implemented, and 20 days before	
						installation of the transmitters, communication	
						should be made to the Radiation Protection	
						Authority for authorization and supervision.	
	Avifauna	Bird fatalities	Environmental	Perman	Environmental	Towers will be built below 40m in height which	Operation
				ent	Control Officer	will avoid bird fatalities.	'
					Site Manager	Construct towers, away from areas of high	
					ŭ	migratory bird traffic, wetlands, and other known	
						bird areas.	
						Minimize the tower 'footprint' on newly	
						constructed towers.	
						If the tower is decommissioned, it should be	
						removed as soon as possible.	
						·	
						Use visual daytime markers in areas of high	
						diurnal birds.	
						Security lighting for on-ground facilities should	
						be minimized, point downwards, or be down-	
						shielded.	
						Conduct on-site bird fatalities monitoring on the	
						tower at least every month.	
						·	
						The use of white strobes results in less circling	
						behavior by nocturnal migrants and thus less	
						mortality than red pulsating lights.	

Impact	Description	PLAN (EMP)): THE PROPOSED 30 METI Effects	Class	Time	Responsibility	Action	Phase
				frame			
						Use insulated conductors and cover energized parts to reduce electrocution risks.	
						Repair Damage Quickly: Ensure that markers, lighting, and insulation are maintained and promptly repaired if damaged.	
						Educate Stakeholders: Inform contractors, workers, and communities about the importance of bird safety and how they can contribute to preventing fatalities.	
						Comply with Regulations: Ensure adherence to national and international environmental laws and regulations aimed at protecting avian species	
	Aviation Impacts	Bird fatalities Air transports impacts	Socio-economic Environmental	Perman ent	Environmental Control Officer	The towers should comply with aviation guidelines so that they do not impact air transport systems.	Construction and operation
					Site Manager	Air traffic visibility systems such as lighting at the tip of the tower.	
						The towers should be designed so that they are visible to birds.	
Land use	There will be a change in	Sudden changes in landscape	Social	Perman	Environmental	The development should blend into the existing	Construction and
change	land use and visual	appearances may be unfavorable for		ent	Control Officer	area through designing and color coding.	operation
	aesthetics	Block D residents.	Terrestrial				
			environment		Site Manager		
Archaelogy &	Impact on historical	Inadvertent damage or destruction to	Social	Constru	Environmental	Awaress to contractors on materials / items	Construction
Heritage	resources	historical resources		ction phase	Control Officer	protected under the National Heritage Act, 2004	phase
					Site Manager	Items protected under the definition of heritage found during unearthing for construction works	

Impact	Description	Effects	Class	Time	Responsibility	Action	Phase
				frame			
						should be reported to the National Heritage	
						Council.	
Positive Impacts							
Employment	The development	Improves disposable income for those	Socio-economic	Project	Site Manager	Work with local leadership (councilor) on	Construction and
creation	provides an opportunity of	employed and their immediate		lifetime		acquiring non-skilled labor from the residents.	operation
	outsourcing work	families.					
Business	Raw materials acquiring	Local suppliers will be presented with	Socio-economic	Constru	Site Manager	The proponent will outsource most of its	Construction and
linkages	and contracting	an opportunity to empower their		ction		materials and services	operation
	companies provide an	businesses.		phase			
	opportunity for						
	businesses.	Construction workers can be provided					
		with accommodation, food, and					
		services from the local community					
		increasing business activities.					
Infrastructure	The development	Improvement in connectivity.	Socio-economic	Constru	Site Manager	The new tower should cover a larger area, and	Construction and
development	presents a unique			ction		they should also consider the provision of	operation
	opportunity for	Boost in Local economy		phase		infrastructure platforms to other networks	
	infrastructure						

4. CHAPTER FOUR: CONCLUSION AND RECOMMENDATIONS

4.1. Recommendation from Environmental Assessment Practitioner

Based on the information provided it is the opinion of D & P Engineers and Environmental Consultants cc that no fatal flaws have been identified for the proposed development and that the information contained in this report is sufficient enough to allow DEA to make an informed decision.

The Environmental Consultant, therefore, recommends that Environmental Clearance be granted for the proposed development based on the following recommendations:

- The proposed activity is not anticipated to have significant environmental impacts.
- There is however a visual impact.

The following recommendations should be implemented to ensure that potential impacts associated with the establishment and operations of the site are minimised:

- Any areas disturbed during construction and operation must be rehabilitated.
- For possible decommissioning purposes, the structure is to be removed when its function ceases and the site should be rehabilitated.
- Construction is to take place during working hours.
- Trampling and disturbance associated with construction should be limited to within 5m (five meters) of the footprint of the site.
- Provisions of the Atomic Energy and Radiation Protection Act, 2005 (Act No. 5 of 2005) should be strictly abided to.
- On completion of the project, all litter and construction debris shall be immediately removed from the site.
- Mitigation measures to reduce the potential visual impact should be implemented as far as possible.