

ENVIRONMENTAL MANAGEMENT PLAN



**Subdivision of Erven 118 and 120 into Portion A and B and
Remainders**

**Rezoning of Portions A/118 and B/120 from 'Lifestyle Residential' to
'Light Industrial'**

**Consolidation of Portions A/118 and B/120 with Erf 119 into Portion C
Omaruru Municipality
Erongo Region**

December 2025

APP- 006751



INFORMATION SHEET

Land Use and Development Activities

1. Subdivision of Erven 118 and 120 into Portion A and B and Remainders
2. Rezoning of Portions A/118 and B/120 from 'Lifestyle Residential' to 'Light Industrial'
3. Consolidation of Portions A/118 and B/120 with Erf 119 into Portion C

PROJECT NAME	:	ENVIRONMENTAL MANAGEMENT PLAN
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PROJECT LOCATION	:	Omaruru Municipality
ECC APPLICATION NO.	:	APP-006751
REPORT DATE	:	December 2025
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ABBREVIATIONS

BAT	-	Best Available Technology
BID	-	Background Information Documents
OM	-	Omaruru Municipality
OWE	-	Omaruru Wildlife Estate
OWELA	-	Omaruru Wildlife Estate Landowners Association
ERC	-	Erongo Regional Council
EC	-	Environmental Clearance
ECC	-	Environmental Clearance Certificate
EIA	-	Environmental Impact Assessment
EIAR	-	Environmental Impact Assessment Regulations
EMA	-	Environmental Management Plan
EMP	-	Environmental Management Plan
IAPs	-	Interested and Affected Parties
MEFT	-	Ministry of Environment, Forestry and Tourism
MURD	-	Ministry of Urban and Rural Development
NamRA	-	Namibia Revenue Agency
NHC	-	National Heritage Council
NSA	-	Namibia Statistics Agency
NSI	-	Namibia Standards Institute
PPE	-	Personal Protective Equipment
SHE	-	Safety, Health and Environment
URPB	-	Urban and Regional Planning Board

DEFINITIONS

Assessment	The process of collecting, organising, analysing, interpreting and communicating information relevant for decision making.
Competent Authority	Means a body or person empowered under the local authorities act or Environmental Management Act to enforce the rule of law.
Construction	Means the building, erection or modification of a facility, structure or infrastructure that is necessary for the undertaking of an activity, including the modification, alteration, upgrading or decommissioning of such facility, structure or infrastructure.
Cumulative Impacts	With respect to an activity, means the impact of an activity that in itself may not be significant but may become significant when added to the existing and potential impacts eventuating from similar or diverse activities or undertakings in the area.
Disposal	Means the discharge, depositing, dumping, spilling, leaking, placing of waste on or at any premises or place set aside by the local authority for such purposes, and "dispose" shall, in the context of this report, have a similar meaning.
Environment	As defined in EMA it means - "land, water and air; all organic and inorganic matter and living organisms as well as biological diversity; the interacting natural systems and the human environment insofar as it represents archaeological, aesthetic, cultural, historic, economic, paleontological or social values".
Environmental Clearance Certificate	A certificate and associated conditions issued in terms of EMA, authorizing a listed activity to be undertaken.
Environmental Impact	A description of the potential effect or consequence of an aspect of the development on a specified component of the biophysical, social or economic environment within a defined timeline and space.
Environmental Management Plan	A working document which contains site project-specific plans developed to ensure that environmental management practices to eliminate and control environmental impacts are followed during the developmental phase of that specific project and would normally consist of construction, operational and decommissioning phases.
Erf	An erf (plural: erven) is a legal term for a piece of land, lot, plot, or stand that is formally surveyed and registered in the deed registry as such and includes every defined portion, not intended to be a public place, or a piece of land laid out as a township, whether or not it has been formally recognized, approved or proclaimed.
Erf Zoning	The use of an erf is strictly governed by the local authority town planning scheme and zoning regulations (e.g. residential, business, industrial or specific institutional purposes like church)
Evaluation	Means the process of ascertaining the relative importance or significance of information, the light of people's values, preference and judgements in order to make a decision.
Hazard	Anything that has the potential to cause damage to life, property and/or the environment. The hazard of a particular material or installation is constant; that is, it would present the same hazard wherever it was present.
Interested and Affected Party (IAP)	Any person, group of persons or organisation interested in, or affected by an activity; and any organ of state that may have jurisdiction over any aspect of the activity.
Non-compliance	Issues that are in direct non-compliance with the requirements, commitments and/or management measures as approved in the EMP.
Proponent or Promotor	Any person who has submitted or intends to submit an application for an authorisation, as legislated by the Environmental Management Act no. 7 of 2007, to undertake an activity or activities identified as a listed activity or listed activities; or in any other notice published by the Minister or Ministry of Forestry, Environment & Tourism.
Public	Means citizens who have diverse cultural, educational, political and socio-economic characteristics. The public is not a homogeneous and unified group of people with a set of agreed common interests and aims. There is no single public. There are a number of publics, some of whom may emerge at any time during the process depending on their particular concerns and the issues involved

Small holding	Means an agricultural holding that is larger than a typical residential erf but smaller than a full-scale commercial farm.
Storage	Means the temporary storage or containment of any waste for a period of less than 90 days after its generation and prior to its collection for recovery, reuse, recycling, treatment or disposal.
Waste	<p>Means any substance or matter whether solid, liquid or any combination thereof, irrespective of whether it or any constituents thereof may have value or other use, and includes –</p> <ul style="list-style-type: none"> a) any undesirable, rejected, abandoned or superfluous matter, material, residue of any process or activity, product, by-product; b) any matter which is deemed useless and unwanted; c) any matter which has been discarded, abandoned, accumulated or stored for the purposes of discarding, abandoning, processing, recovery, reuse, recycling or extracting a usable product from such matter; or d) products that may contain or generate a gaseous component
Waste Management Plan	Means a structured document that sets out to record /eliminate/ reuse /recycle the amounts and the types of all waste that is generated in an area or facility.

1. THE PROJECT OVERVIEW

1.1 INTRODUCTION

This is an Environmental Management Plan (EMP) prepared to support an application for an Environmental Clearance Certificate (ECC) required to undertake a listed activity. The applicant is Mr Brian Enslin and the proposed listed activity is located within the jurisdiction of Omaruru municipality, Erongo Region.

The EMP has been prepared in terms of the Environmental Management Act (EMA) and Environmental Impact Assessment (EIA) Regulations to serve as a standalone plan to manage any potential impacts that may be associated with the execution of the aforesaid listed activity. It should be read in conjunction with the scoping assessment report prepared for this project referenced **APP006751**.

Whilst there are no physical activities required or associated with undertaking the planned listed activity, which is purely an administrative process, the EMP is nevertheless prepared to mitigate potential adverse impacts associated with the activities that are currently conducted on the premises.

1.2 THE LISTED ACTIVITY

The applicant owns three smallholdings (Table 1) and is planning to undertake a listed activity.

Table 1: Details of the Smallholdings involved in the Project

Erven	Area (ha)	Zoning	Status
Erf 118	13. 8198	Lifestyle Residential	Vacant
Erf 119	13.1734	Light Industrial	Developed and used as a parking yard for heavy earthmoving machinery and equipment.
Erf 120	13.6442	Lifestyle Residential	Vacant

The proposed town planning process involved is as tabulated in Table 2.

Table 2: Proposed Subdivision and Rezoning

Description of the Activities	Footprint in hectares (ha):	
	Portions	Remainder
Subdivision of Erf 118 into Portion A and Remainder	2.9598	10.8650
Subdivision of Erf 120 into Portion B and Remainder	1.2024	12.4400
Total Footprint of Subdivided Portions (A+B)	4.1622	
Rezoning of Portions A/118 and B/120 from Lifestyle Residential to Light Industrial		
Consolidation of Portions: A/118 and B/120 into Portion C – combined footprint ±17.3374 ha		
Zoning for consolidated Portion C remains 'Light Industrial' with a bulk of 0.5		

1.3 TRIGGERED ACTIVITIES

In terms of the EMA and EIA Regulations, the proposed project has triggered listed activities as tabulated below.

Table 3: Triggered Activities

Activity Category	Expansion
Land Use and Development Activities	Paragraph 5.1 The rezoning of land from 'Lifestyle Residential' to 'Light Industrial'

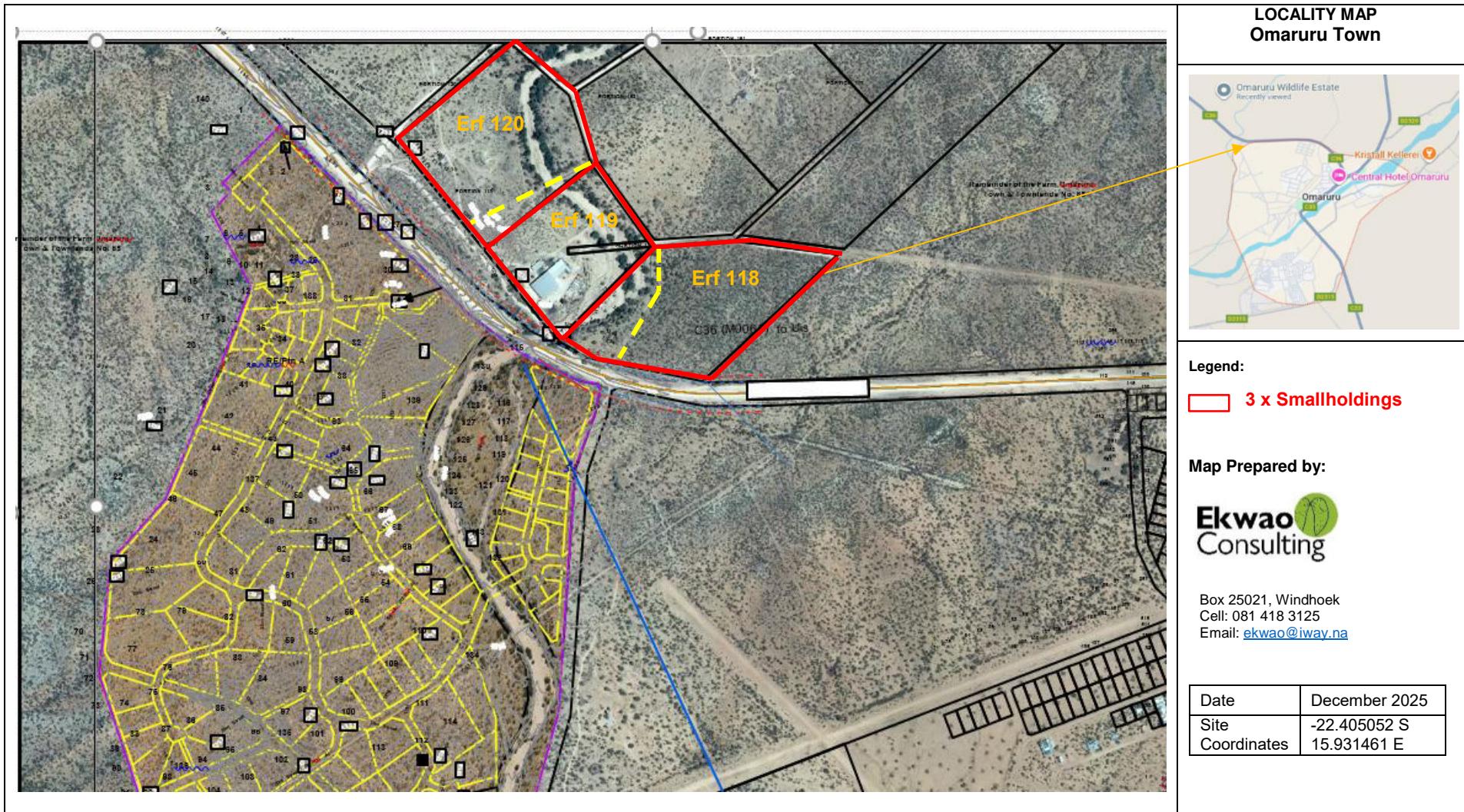


Figure 1: Project Location Map – Google Earth Image

1.4 OBJECTIVES OF THE EMP

The overall objectives of the EMP can be summarised as follows:

- Identify mitigation measures and environmental specifications which are required to be implemented during the phases of the project – planning, operation and or decommissioning.
- Ensure that all the phases of the proposed project do not result in undue or reasonably avoidable adverse environmental impacts, to ensure that any potential environmental benefits are enhanced to benefit the broader community members.
- Identify entities/parties responsible for the implementation of the measures and outlined functions and responsibilities.
- Create management structures that address the concerns and complaint of interested and affected parties (IAPs) with regards to the proposed project.
- Propose mechanism and frequency for monitoring compliance, and preventing long-term or permanent environmental degradation'
- Comply with all applicable laws, regulations, standards and guidelines for the protection of the environment.

1.5 LEGAL OBLIGATION

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

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

2. PRESENTATION OF THE EMP

2.1 INTRODUCTION

Presented in this section is the EMP – a document in which the measures proposed to avoid or to reduce the listed activity's adverse impacts (if any) on to the environment are presented. Specific actions for mitigation, monitoring and management during all phases are detailed from planning through to construction and operation where applicable.

2.2 COMPONENTS OF THE EMP

The key components of the EMP are presented in Table 5 below:

Table 4: Components of the EMP

Component	Expansion
Environmental Aspect	Lists the project's activities or products or services that interacts or can interact with the environment, i.e. a coal-fired plant (Van Eck Power Plant) emitting smoke from its chimney when generating electricity.
Potential Impacts	Outlines the impacts whether good or bad to the natural environment (air, water, land, plants and animals) caused by human activities or products or services causing pollution, contamination, resource depletion, etc.
Monitoring	Describes how the project's environmental performance will be tracked and measured to ensure mitigation measures are working.
Management actions/control	Specifies the actions to be taken so as to avoid, reduce, or eliminate potential negative impacts on the environment including the roles and responsibilities of staff, incident reporting, and the use of personal protective equipment.

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

It serves as a practical, guidance document to be followed by the project team and contractor. It is a "living document" that should be updated as and when the project progresses or if new information becomes available.

2.3 FUNCTIONS AND RESPONSIBILITIES

Formal responsibilities are necessary to ensure that key management measures/procedures are executed. The promotor will be responsible for the overall execution of the project. The following are the roles and functions of the various parties:

2.3.1 OMARURU MUNICIPALITY

The project site falls under the Omaruru Municipality. In this regard the municipality has various roles and functions to play with respect to the development. Some of these are:

- To ensure municipality bylaws are complied with (where applicable).
- To supply adequate clean potable water.
- To remove waste from the business premises.
- To conduct site inspections/visits at their discretion.
- To review and approve all building plans submitted for any future development on the smallholdings.
- To enforce legal mechanism for any contraventions of municipality bylaws.

2.3.2 THE APPLICANT OF THE ECC

The applicant has to ensure that:

- An ECC and any other applicable permits are obtained timeously and kept on file.
- A waste management plan to deal with solid and hazardous waste for the smallholdings must be developed and implemented.
- Maintain ongoing compliance with all applicable legislations, regulations and policies pertaining to the development.

2.4 MANAGEMENT ACTIONS/MITIGATION MEASURES

The EMP has been presented in one table covering aspects associated with these phases:

- Planning Phase – this is the only phase that is applicable for this project.
- Construction Phase – there are no construction activities required for this specific project.
- Operational Phase – this is merely intended to safeguard the activity currently conducted on the premises.
- Decommissioning – this aspect does not apply to the specific project

2.4.1 EMP FOR THE PLANNING PHASE

During the 'Planning Phase' the applicant is expected to have drawn up a detailed blueprint for the project which includes defining project objectives, scope, timelines and allocating resources. It is during this stage that specific steps are taken to ensure that the project is executed successfully.

The aspects proposed from an environmental perspective under this phase, are related to compliance and appointments of service providers (town planner to prepare the necessary layout and to handle the rezoning application through the statutory process, land surveyor to survey the affected land and prepare the necessary diagrams for submission to the Surveyor General, Deed Registry, etc. and EIA consultants to obtain an ECC from the OEC. The promotor is the party responsible for all aspects related to this phase. There are no environmental impacts associated with this phase for this project.

2.4.2 EMP FOR CONSTRUCTION PHASE

There are no construction activities required for execution of this listed activity. The existing perimeter fence to the south and north becomes the registered cadastral surveyed line once approval is granted. There is no fence installed following the existing and registered cadastral line to the south and north of smallholding 119. Therefore, this line is cancelled so that the existing perimeter fence to the south and north becomes the formal registered borders. All existing services and infrastructure are adequate and will remain intact.

2.4.3 EMP FOR OPERATIONAL PHASE

The rezoning for this project is purely for administrative purpose only, and does not result in any environmental impacts. The management actions provided in this section are intended to cater for the current activities that are currently conducted on the premises – storage yard for heavy duty construction machinery (mobile crushing plants, excavators, frontend loaders, graders, JCBs, containers for spare parts, etc. Aggregate and building sand are also kept on the premises and sold to third parties but the scale and scope is relatively very small.

2.4.4 EMP FOR DECOMMISSIONING

As regards project decommissioning, once an even has been rezoned for a specific land use, the process can only be reversed by another 'rezoning process' – therefore decommissioning does not apply for this project.

Table 5: EMP for the Planning Phase

Aspects	Potential Impacts	Management Actions/Mitigation Measures	Monitoring Frequency
Planning Phase (No impacts are associated with this phase)			
Operational Phase (for the activity currently conducted on the premises)			
Compliance	Comply with applicable regulations, policies and local authority bylaws.	<ul style="list-style-type: none"> ➡ An ECC is mandatory and must be obtained and presented to URTB for rezoning approval. ➡ Any other permits that may be required must be obtained. ➡ Comply with reporting requirements where applicable. 	Prior to lodging the rezoning application to URPB.
Operational Phase (for the activity currently conducted on the premises)			
Noise Pollution	Nuisance impacts	<ul style="list-style-type: none"> ➡ Confine any servicing and repairing of machinery, plant and equipment to sunrise and sunset. ➡ Manage activities that generate excessive noise pollution. ➡ Provide suitable PPEs to personnel working in noisy areas. ➡ Avoid long idling, engine revving and or hooting especially before sunrise and sunset. ➡ No loud music is allowed to be played on site and no noise amplification equipment may be kept. ➡ Whenever a complaint is received regarding noise pollution, investigate and take correction action. ➡ Continuous monitoring of noise levels should be conducted to make sure the noise levels on the premises does not exceed acceptable limits. 	Check weekly Whenever a complaint has been reported
Air Quality	Nuisance and health impacts	<ul style="list-style-type: none"> ➡ Manage activities that generate excessive gaseous emissions during the servicing and repairing work on machinery & plants. ➡ Service and repair construction vehicles, machinery and equipment regularly. ➡ Avoid conducting activities that are prone to wind erosion during those conditions of heavy wind blowing. ➡ Site stockpiles of sand and aggregates away from predominant wind directions. ➡ Tipper trucks delivering sands to end-users should be covered to prevent windblown dust. ➡ Dust protection masks should be provided to personnel if they complain about dust. 	Check weekly/monthly Throughout the lifespan of the facility
Impacts on Fauna and Flora	Loss of biodiversity	<ul style="list-style-type: none"> ➡ Protected trees are not to be removed without a valid permit from the Department of Forestry. ➡ No alien species may be planted on or brought on the premises. 	Weekly Whenever a complaint has been received

Aspects	Potential Impacts	Management Actions/Mitigation Measures	Monitoring Frequency
		<ul style="list-style-type: none"> ▫ No collecting of fire wood or other plant products on or near the premises. ▫ Only a limited width of ±5m on the side of roads may be partially cleared of vegetation. ▫ Poaching of wild animals on the property or neighbouring properties (OWL) is prohibited and offenders will be prosecuted. ▫ Birds nesting on trees and buildings must not be disturbed. ▫ Food items must be placed in secured bins to discourage scavenging. ▫ Dogs and cats may be kept on the premises with the concurrence of OWELO. 	
Soil and Land Use	Loss of topsoil and associated opportunity costs	<ul style="list-style-type: none"> ▫ Whenever construction activities take place that involve excavations or trenching, topsoil should be stockpiled in a demarcated area for future rehabilitation. ▫ Movements of construction machinery and vehicles on the premises must be confined to internal routes that are created for such purposes. This will limit compaction and creation of a hard subsurface of the premises inhibiting growing of vegetation and plants. ▫ Construction machinery and equipment must be in a good condition to ensure that accidental oil spills do not occur and contaminate the soil. ▫ In case of any spills or leaks, the entire fuel-soaked soils must be collected and temporarily stored in a leak-proof containers for disposal to an approved offsite landfill area. 	Check weekly throughout the lifespan of the facility
Hazardous Products (Spills & Leaks)	Contamination of surface and groundwater sources.	<ul style="list-style-type: none"> ▫ All heavy construction machinery and equipment on the premises should be provided with drip trays. ▫ All heavy construction machinery and vehicles should be maintained regularly to prevent oil leakages. ▫ Maintenance and washing of construction machinery and vehicles should take place only at designated workshop area and should not take place on open soil. 	Daily, weekly throughout the lifespan of the facility
Water, Sewerage and Greywater	Contamination of surface and groundwater sources and water wasting	<ul style="list-style-type: none"> ▫ The wash water (grey water) collected from the cleaning of equipment on-site should not be left standing for long periods of time as this promotes parasite and bacterial proliferation. ▫ Grey water should be recycled: <ul style="list-style-type: none"> ○ Used for dust suppression; ○ Used to water a vegetable garden, or to support a small nursery; ○ Used (reused) to clean equipment. ▫ Grey water that is not recycled should be removed on a regular basis. ▫ No dumping of waste products of any kind in or in close proximity to water bodies. ▫ Heavy construction vehicles should be kept out of any water bodies and the movement of construction vehicles should be limited where possible to the existing roads and tracks. ▫ Ensure that oil/ fuel spillages from construction vehicles and machinery are minimised and that where these occur, that they are appropriately dealt with. ▫ Drip trays must be placed underneath construction vehicles when not in use to contain all oil that might be leaking from these vehicles. 	Daily, weekly, throughout the lifespan of the facility

Aspects	Potential Impacts	Management Actions/Mitigation Measures	Monitoring Frequency
		<ul style="list-style-type: none"> ➡ Contaminated runoff from the construction sites should be prevented from entering the surface and ground water bodies. ➡ All materials on the construction site should be properly stored. ➡ Disposal of waste from the sites should be properly managed and taken to the designated landfill site in Omaruru. 	
General Waste	Potential soil contamination Visual nuisance	<ul style="list-style-type: none"> ➡ Develop a waste management plan for the storage yard. ➡ The storage yard should be kept tidy at all times. ➡ Domestic and general waste produced on a daily basis should be cleaned and contained daily. ➡ No waste may be buried or burned. ➡ Waste containers (bins) should be emptied regularly and removed from site to a recognised (municipal) waste disposal site. ➡ All recyclable waste needs to be taken to the nearest recycling depot where practical. ➡ A sufficient number of separate bins for hazardous and domestic/general waste must be provided on site. These should be clearly marked as such. 	Daily, throughout the lifespan of the facility
Ablution facilities	Non-compliance with Health and Safety Regulations	<ul style="list-style-type: none"> ➡ Separate toilets should be available for men and women and should clearly be indicated as such. ➡ Portable toilets (i.e. easily transportable) should be available at every construction site. ➡ Sewage needs to be removed on a regular basis to an approved (municipal) sewage disposal site. Alternatively, sewage may be pumped into sealable containers and stored until it can be removed. ➡ Personnel responsible for cleaning the toilets should be provided with environmentally friendly detergents, latex gloves and masks. 	Daily, weekly, throughout the lifespan of the facility
General Health and Safety	Injuries or even loss of life	<ul style="list-style-type: none"> ➡ A fully stocked first aid kit should permanently be available on-site as well as an adequately trained member of staff capable of administering first aid. ➡ All workers should have access to the relevant personal protective equipment (PPE). ➡ Sufficient potable water reserves should be available to personnel at all times. ➡ No person should be allowed to smoke close to fuel storage facilities or portable toilets (if toilets are chemical toilets – the chemicals are flammable). ➡ No personnel should be allowed to drink alcohol during work hours. ➡ No personnel should be allowed on site if under the influence of alcohol. ➡ Building rubble and domestic waste should be stored in skips. ➡ Condoms should be accessible/ available to all construction workers. 	Daily, throughout the lifespan of the facility

3. RECOMMENDATION

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

Rezoning is essentially a once-off administrative process, and if the proposed activity is performed during the validity period of the ECC, there will not be any need to update and review this EMP. For this specific project, there are no construction activities required and as such there are no impacts involved – real or perceived.

It is recommended that the application for an ECC be approved.