ANNEXURE K

ENVIRONMENTAL MANAGEMENT PLAN (EMP)

ENVIRONMENTAL IMPACT ASSESSMENT FOR THE PROPOSED DR FRANS AUPA INDONGO PRIVATE COLLEGE AT EKANDA VILLAGE, OMUSATI REGION

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PROJECT NAME	Proposed Construction and Operation of the Dr. Frans Aupa Indongo Private College
STAGE OF REPORT	ENVIRONMENTAL MANAGEMENT PLAN
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Acronyms

	Directorate of Environmental Affairs	DEA
	Doctor Frans Aupa Indongo Private College	DRFAIPC
	Employer's Representative	ER
	Environmental Assessment Practitioner	EAP
	Environmental Clearance Certificate	ECC
	Environmental Control Officer	ECO
	Environmental Impact Assessment	EIA
	Environmental Management Plan	EMP
	Roads Authority	RA
	Ministry of Agriculture, Water and Land Reform	MAWLR
	Ministry of Education Arts and Culture	MOEAC
	Ministry of Environment Forestry and Tourism	MEFT
	Ministry of Mines and Energy	MME
	Ministry of Urban and Rural Development	MURD
	Ministry of Works and Transport	MoWT
	Namibia Power Corporation	NamPower
	Namibia Water Corporation	NamWater
	Namibia Heritage Council	NHC
	Northern Electricity Distributor	NORED

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1. Introduction and Background

1.1. Background

Dr. Frans Aupa Indongo Private College hereinafter referred to as the proponent appointed Envirofficient Consultants cc to conduct an Environmental Impact Assessment for the proposed private school which is to be established on a parcel of land situated in the Ekanda Village, Elim constituency, Omusati Region. Envirofficient consultants cc has been appointed to conduct an Environmental Impact Assessment (EIA) and develop an Environmental Management Plan (EMP) for the proposed private college.

According to the Environmental Management Act (2007) and its Regulations (2012) all development falling within the listed activities needs to be evaluated against the biophysical and socio-economic aspects to determine the environmental sensitivity and extend consultation to potentially Interested and Affected Parties (I&APs), to insure inclusivity and draft mitigation measures in an Environmental Management Plan (EMP) to minimize potentially negative impacts.

1.2. Location of the project

The proponent was allocated a portion of land by the Uukwambi Traditional Authority at Ekanda Village, Elim Constituency in Omusati Region. The land parcel is situated at 15°28'15"E and 17°47'0"S. The proposed development site is about 57.124 hectares in extent.

The proponent have obtained an allocation letter from the traditional Authority, and will be applying for leasehold rights from the Omusati Communal Land Board established through the Communal Land Reform Act 5 of 2002 as soon as the ECC is obtained.

1.3. Description of the proposed site

The proposed site is currently vacant, but was previously used as Mahangu field before it was returned to the traditional authorities by the previous owners. The traditional authority then allocated it to Dr. Frans Aupa Indongo Private College for the purpose of establishing a place of instruction (private College). The topography of the site is flat, and there are no existing servitudes within the proposed site, apart from the informal roads and walking paths across the land parcel.

1.4. Objectives of the Environmental Management Plan

This document describes the Environmental Management Plan (EMP) as learned in the Environmental Impact Assessment (EIA) conducted for the proposed establishment of DRFAIPC. The EMP is a legal tool implementing the environmental

management actions, as described in an EIA for all phases of development of the project.

This includes providing the proposed mitigations measures and actions to remedy the identified environmental impacts;

- To provide strategies for monitoring and management of identified environmental issues;
- Provide context for monitoring of certain environmental aspects for effectiveness of the proposed mitigation measures; and
- To guide the responsible persons in following suitable contingency plans in the case of various possible impacts.

2. Responsibilities

The main responsibility to implement the EMP lies with the proponent (DRFAIPC), who is the initiator of the project, and who will be responsible for appointment of the contractors, sub-contractors and the entire operation of the project. Implementing the EMP needs mutual participation of different stakeholders, each accomplishing different but important roles to ensure a satisfactory environmental management in all the phases of the project namely planning, construction and operation phases.

2.1. The proponent

The Proponent is responsible for the appointment of the Employers Representative (ER), who will manage all the contracts and services that are outsourced during the project planning, construction, maintenance and operation phases. The ER can be an employee of the DRFAIPC with technical knowhow, and all the official communication regarding the work contracts must be communicated through this person.

Responsibilities of a proponent:

- To enforce the final EMP after it has been approved by DEA and ensure compliance of the project with all the conditions of approval.
- To train all contractors, sub-contractors and employees about the EMP.
- To notify MEFT and EAP on projected amendments to the proposed project.
- Appoint the responsible person to take the responsibility monitoring environmental affairs on site and ensure implementation of the EMP by Contractor and sub-contractors.
- To assess the application of the EMP on a regular basis by all parties.
- To ensure compilation and submission of annual Environmental Reports to the relevant authority.

2.2. The Employers Representative (ER)

The ER will therefore need to appoint an Environmental Control Officer, who will represent the developer and the ER on Site, to help monitor all environmental aspects with the contractors and implement the EMP on site. The ER shall assist the ECO where necessary and will have the following responsibilities regarding the implementation of this EMP:

- to ensure that the environmental aspects and necessary permits are obtained before carrying out of activities by the contractors on site with the assistance of the Environmental Control Officer.
- To guide the contractor towards finding solutions related to environmental affairs.
- To ensure that all equipment and machineries on site are environmentally friendly (not leaking/ spilling oil).

- To fine, penalize or dismiss employees on site who may not be complying with the EMP.
- To advice and review work of the ECO to ensure compliance with the EMP, and compile monthly reports to DRFAIPC.

2.3. The Environmental Control Officer (ECO)

The ECO is appointed by the ER to act as the proponent or Developer's eyes on the ground and monitor the site in terms of Environmental Management Plan, and ensure compliance of the activities. In cases whereby there is no ECO appointed, the ER will serve for both ECO and ER tasks. The following are the responsibilities of the ECO:

- To help the ER in making sure that all activities on the ground have authorization and required permits.
- Coordinate communication between the Contractor, the ER, the Developer and any other interested and affected parties with regard to environmental affairs.
- To carry out monthly reviews of the project area and ensure compliance with the EMP, and ensure that all possible impacts are minimized and ensure that all new personnel were offered with appropriate environmental awareness training.
- Take suitable action if the specifications of the EMP are not adhered to;
- To advice the contractor in finding environmentally friendly solutions to problems that may arise.
- To advice on the dismissal of persons, equipment or machineries from the project that are not complying with the specifications of the EMP through the ER.
- To recommend fines for misbehaviors that may occur on site in relation to personnel contravening the EMP; and
- To review the EMP and recommend additions or changes to the document to accommodate changes.

2.4. The Contractor

The Contractor is responsible for the implementation, monitoring and evaluation of the EMP onsite. It is likely to be that different contractors will be appointed to carry out different tasks throughout the existence of the project. Contractors needs to be classified into categories based on the level of construction such as design contractors, the construction contractors, operation/service contractors. This EMP is legally binding and will guide all contactors that will be involved in this project. All contractors needs to ensure that enough environmental awareness and training of employees in languages that they understand is offered, and the

Contractor should keep records of all environmental training sessions, including names, dates and the information presented.

2.5. The Sub-contractors

It is anticipated that sub-contractors will be appointed at different development stages of the project, it is therefore a responsibility of the appointed contractors and sub-contractors to comply with this EMP, and the proponent must at all-time make sure all appointed contractors and sub-contractors adhere to the EMP.

Upon receipt of the copy of the EMP, the subcontractors must execute their activities in compliance with this EMP, and ensure that enough environmental awareness training is offered to all employees joining the project.

2.6. Ministry of Environment, Forestry and Tourism

The authorities responsible for environmental affairs through the responsible departments, needs to control and monitor the project, to ensure compliance to different regulations.

2.7. Other, government ministries

Ministry of Education Arts and Culture, Ministry of Labor, Industrial Relation and Employment Creation, Ministry of Health and Social Services, Omusati Regional Council and many others should also provide necessary assistance in terms of monitoring, supervision, information, or expertise as case may be, which are required for the successful implementation of this EMP.

Furthermore, the Pollution Control and Waste Management Bill has identified various government ministries namely MAWLR, MURD, MWT and MME, to oversee pollution control and waste management in Namibia.

2.8. The Environmental Assessment Practitioner (EAP)

The environmental assessment practitioner is responsible for the submission of Environmental Reports to the Ministry of Environments, Forestry and Tourism; and provide additional information regarding the proposed DRFAIPC study, whenever required by interested and affected parties. The EAP should also be available to provide training and environmental education on this EMP on appointment by the proponent. EAP should also be available to make amendments or additions to this EMP in accordance with the recommendations of the EIA study.

3. Environmental Management Requirements

The Accomplishment in implementation of this EMP is subject to different factors that needs to be prepared. Training, awareness, record keeping, enforcements and monthly reporting are some of the vital sectors required.

3.1. Environmental awareness training

Training needs to be offered to all employees, contractors and sub-contractors involved in all sectors of the project about the protection of the environment and methodologies on how to go about mitigating possible impacts on the environment before commencement of any work. The proponent is responsible for briefing before any contracts are awarded onsite and such record of trainings should be kept.

3.2. Record keeping

There is a need for record keeping or filling system for the project regarding the implementation of the EMP, which records all trainings and the dates they were offered. Thereafter audit reports and all public complaints must be recorded. Such record should be kept for a minimum period of not less than two years after completion of the project, and such records must be supplemented by photographs.

3.3. Enforcements: Non-compliance and penalties

Upon approval of this EMP by MEFT, this document shall be considered as legally bidding, and in cases of contraventions and disobedience of this EMP, the offender should be liable to a penalty. Contraventions should be recorded in a dedicated register, and be filed. The Proponent should penalize the offender based on the nature of the environmental damage.

3.4. Environmental Reports

The proponent shall be responsible for the compilation of the project completion report and must indicate the environmental performance and matter of incidental. The EAP will conduct regular monitoring of project activities during all project phases and keep records. These records may be required by the competent authority when deemed necessary.

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4. Legal Requirements

As part of implementation of this EMP, the proponent must comply with the requirements of various national legislations.

Table 1: Applicable National Laws

Theme	Legal Framework	Relevant Provisions
The Constitution	Namibian Constitution	National objectives Promote sustainable environmental welfare Maintain biological diversity promotes sustainable utilization of biological natural resources - Limiting over-exploitation of non-renewable resources,
Communal Land	Communal Land Reform Act 5 of 2002	Provides for the allocation of land rights in communal areas; Establish Communal Land Boards; provide powers to Traditional Authorities and Boards in relation to communal land; registration of lease and use rights in communal areas. **Section (19) allows for the rights of leasehold to be allocated in respect of communal land under this Act** **Section 29 prohibits the obstruction of any watering place on the commonage, or prevent or attempt to prevent any person from drawing water from, or watering stock at, such a watering place, or pollute the water at such watering place or interfere with the operation at such a watering place**
Compensation	Compensation Policy Guidelines for National Compensation Policy (applied	Explains situations that may give rise to compensation e.g. where land is taken for township expansion or other public service sector developments; **Gives direction on how compensation shall be determined; Helps affected land owners to choose and option they consider fair; and Is**

	with effect from April 2008)	**applicable in cases where an occupant of land within communal areas has been occupying the affected land in accordance with customary laws of the area.**
Environmental	Environmental Management Act 7 of 2007	Requires that projects with significant environmental impact are carefully considered subject to an environmental assessment process as per the listed activity. **The proponent cannot deviate from the principal activity of operating school activities and access road, should the proponent want to change the land use, they should inform the competent authority to determine if and EIA is required for the new land use.**
Forestry	National Forest Act 12 of 2001	Tree species and any vegetation within 100m from a watercourse may not be removed without a permit **Ensure compliance to the requirement of this Act to avoid disobedience.**
Labour	Labour Act 11 od 2007	Details requirements regarding minimum wage and working conditions (S39-47). To establish a comprehensive labour law for all employers and employees; to entrench fundamental labour rights and protections. Regulate basic terms and conditions of employment; ensure the health, safety and welfare of employees; to protect employees from unfair labour practices; to regulate the registration of trade unions and employers' organisations; to regulate collective labour relations; to provide or the systematic prevention and resolution of labour disputes; **Any employment to be done on this project (whether by the Proponent, Main Contractor, or Sub-contractors or any other service providers needs to be in accordance of the Labour Act.**

	Employment Service Act, 8 of 2011	To provide for the establishment of the National Employment Service; to impose reporting and other obligations on certain employers and institutions; to provide for the licensure and regulation of private employment agencies; and to deal with matters incidental thereto. **Any employment provided whether by the proponent or by contractor at this site must be in accordance with the Labour Act.**
Health and Safety	Health and Safety Regulations GN 156/1997 (GG 1617)	Details various requirements regarding health and safety of labourers. Section 119 of this Act prohibits the existence of a nuisance on any land owned or occupied by the proponent. **The site must be fenced off and employees handling equipments must be furnished with PPE at all times to ensure safety throughout the existence of the project**
	Public Health and Environmental Act, 2015	The objectives of the PHE Act are to; • Promote public health and wellbeing • Prevent injuries, diseases and disabilities • Protect individuals and communities from public health risks • Encourage community participation in order to create a healthy environment • Provide for early detection of diseases and public health risks **Section 2 of the act requires that a). "Every local authority must take necessary reasonably and applicably measures to maintain its local authority area at all times in a hygienic and clean condition"** **b). Prevent occurrence of a health nuisance, unhygienic condition, an offensive condition or any condition which could be harmful or dangerous to the health of a person within its**

		local authority or the local authority area of another local authority"
Waste and Pollution	Pollution Control and waste management Bill	The Bill serves to regulate and prevent the discharge of pollutants to Air and Water, and provide General waste management. The bill further regulate the discharge of pollutants into the air, water and general waste management. **The bill provide outline for a mass management on pollution control and waste management in the country. Each authority identified by the bill should play waste management roles. Shall play its respective roles.**
	Atmospheric Pollution Prevention Ordinance 11 of 1976	This Ordinance generally provides for the prevention of the pollution of the atmosphere and for matters incidental thereto. Part IV of this ordinance deals with dust control. Dust in the air forms part of air pollution as it affects occupational health and safety. **According to the Ordinance, the Local Authority shall control and prevent atmospheric air pollution or emission of noxious or offensive gases by smoke.**
	Hazardous Substance Ordinance of 1974	This Ordinance provides for the control of toxic substance and thus also relevant for pollution control. It covers for the manufacturing, sale, use, disposal, dumping, importing and exporting of hazardous waste. **Any use of hazardous substance must be in compliance with this ordinance** **All hazardous substances must be disposed off at designated disposal sites.**
Services and Infrastructure	Road Ordinance 1972 (Ordinance 17 0f 1972)	Width of proclaimed roads and road reserve boundaries (S3.1) Control of traffic on trunk and main roads (S27.1)

		Rails, tracks, bridges, wires, cables, subways or culverts across or under proclaimed roads (S36.1) Infringements and obstructions on and interference with proclaimed roads. (S37.1) Distance from proclaimed roads at which fences are erected(S38) **The roads restrictions must be met, where not possible consent from the relavant authority must be obtained**
	Advertising on Roads and Ribbon Development Ordinance 30 of 1960	
Water	Water Resources Management Act 2004 and the Water Act No 54 of 1956	Sections 21(1) and 21(2) of the Water Act are required for the disposal of industrial or domestic waste water and effluent. Prohibits the pollution of underground and surface water bodies (S23(1)). Liability of cleanup costs after closure/ abandonment of an activity (S23(2)). Protection from surface and underground water pollution. **The effluent of human waste under this frameworks are the main focus; the use of mobile toilets during construction phase should be properly positioned while placement of permanent ablution facilities for the school should be far from watercourse to avoid any seepage into existing water course, infiltration into soil and etc.**

5. Implementation of the Environmental Management Plan

The proponent should play an important role in employing this EMP. This section provide a manner in which the EMP is to be implemented and also highlight responsibilities of all parties involved to perform their respective roles in accordance with this EMP.

Table 2: Management Plan: Planning and Design Phase

Environmental Impacts	**Mitigation Measures**	**Roles and Responsibilities**	
		implementation	**monitoring**
Materials for construction	Ablution facilities, science labs, storerooms should be located far away from the watercourse The materials to be used for construction must be non-hazardous and such must be specified in the building plan.	Design Contractor	Proponent
Design of infrastructures	The architecture must design visually attractive designs that feature with the local environment. Consider traffic accommodation in the designs, this includes parking, pick-up and drop-off zones	Design Contractor	Proponent
Accommodation of physically challenged students in infrastructure designs	The architecture must accommodate physically challenged students i.e. by adding ramps to all the buildings to be constructed Toilets for disable students must also be accommodated in the drawings.	Design Contractor	Proponent
Safety of students and learners	Accommodation of a security personnel, by adding a security control room at the entrances and add a fence or boundary wall around the school facility	Design Contractor	Proponent MoEAC

Accommodation of natural disasters in the building designs	The architect must design buildings with ease exists in terms of natural disasters like earthquake, and raise the DPC level of structures, as a measure to plan against the flood	Design Contractor	Proponent
Provision of Sanitation facilities	Provide 1 toilet facility for every 40 students, as in accordance with Ministry of Education requirements	Design Contractor	Proponent, MAEC, MOHSS
Public health and Safety	Include a sickbay in the school design for medical	Design Contractor	Proponent, MoEAC

Table 3: Proposed Mitigation Measures: Construction Phase

Environmental Impacts	**Mitigation Measures**	**Roles and Responsibilities**	
		implementation	**monitoring**
Clearing of vegetation for school and access road leads to habitant destruction	Only clear on areas where infrastructures will be built, vegetation on open areas must be left alone. No animals should be killed	Building contractor	Proponent, MEFT
Impact on soil (compaction, excavation, contamination and erosion)	To only keep the heavy equipment that are need at that point in time on site. To only compact on areas that needs compaction. Make sure the heavy machines to be used or kept on site during construction have no leakages and are properly fixed from leaking to contaminate the ground.	Building contractor	Proponent, MEFT
Waste Generation, Pollution of groundwater and Surface Water (Tshongwa water	All waste to be contained not to penetrate to either surface or groundwater and be collected and only dispose-off at designated areas. Leaking vehicles and machineries to be fixed and	Building contractor	Proponent, MAWLR, MEFT

point and Oshanas)	kept out of site. Routine inspection for possible leaking to be done on machineries on site and, No littering of solid waste is allowed.		
Sanitation facilities for employees	There is a need to set up sanitation and ablution facilities on site to ensure hygiene, during construction phase (1 toilet with shower, 1 washing basin, 1 urinal) per 25 workers).	Building contractor	Proponent, MOHSS
Traffic congestion due to construction vehicles	Construction vehicles should be marked with danger tape and reflectors to ensure visibility from the distance. Clear sign boards should also displaced on both sides of the roads to warn all the road users about the construction site and vehicles. Peak traffic hours may be avoided (06h00-08h00 and 16:30-18:30) to minimize traffic congestion on public roads.	Building contractor	Proponent, RA, MOWT
Increased noise due to construction	Work to be restricted to normal working hours and weekdays, and reserve the rest of the hours to allow neighbors to rest from the noise.	Building Contractor	MOHSS
Visual intrusion due to waste generated during construction	Building designs needs to be aesthetic and greener environment must be promoted, more trees must be planted to restore a natural environmental look. All building rubles and waste should be collected and disposed of at designated waste disposals to avoid pollution and nuisance	Building Contractor	MEFT, MOHSS, Proponent

	around the site. No solid waste should be left to pile up on site.		
Increase in dust and air pollution as a result of construction vehicles	The site area to be watered to avoid emission of dust in the air, and construction vehicles to be properly covered to avoid building rubbles from falling and dirtying the roads. Furthermore, the access road to be used must be cleaned up from time to time.	Building Contractor	MEFT, MOHSS
Increased risk for employees to contract diseases such as HIV/AIDS Covid 19	The Covid 19 disease should be taken very serious; therefore hand washing and sanitisers must be placed at entrances of the site, mandatory wearing of masks as prevention measure to avoid transmission between workers and site visitors as much as possible. Sex education , Covid 19 and HIV/AIDS methods of contraction should be amongst the topic that should be covered in the induction meetings for all employees working on the project	Building Contractor	MOHSS
Health and safety measures for the employees	The project area should properly be fenced off and Marked with visible signage as construction site and workers must wear full protection gears (PPE) with dust masks to minimize the health risks of employees at all times. Training must be offered both in relation to the job and to offer first aid, subsequently	Building Contractor	MOHSS, Proponent

	ensure first aid kits availability onsite. Appoint a health and safety officer on site in accordance of the labour act.		
Increased water consumption	Recycle water for construction activities	Building Contractor	NamWater
Creation of employment for the local residents	The local community to be given priority when recruiting to promote the local economy and empowerment of the local community.	Proponent	MOLEC
Archaeological resources	If there are any suspected archaeological findings during construction, they need be reported to the NHC in accordance with National Heritage Act.	Building Contractor	Proponent, NHC

Table 4: Proposed Mitigation Measures: Operation Phase

Environmental Impacts	**Mitigation Measures**	**Roles and Responsibilities**	
		implementation	**monitoring**
Contamination of groundwater from leaking pipes	Continuous care and maintenance of materials used for construction must be carried out to prevent leakage and contamination of groundwater. The chemistry labs to be built at the school must only dispose-off the chemical at designated dumping sites.	Proponent, Maintenance Contractors	MAWLR
Waste generation	Solid waste to be generated during the operation of the school should only be disposed-off at designated disposal sites	Proponent	Omusati Regional Council, MEFT
Students Interaction and adaptation	Classify students based on their age groups to avoid conflicts between them i.e. bullying both at classes and at the hostel. Involve students in coloring of		MOEAC

	their classrooms, especially the lower primary grades.		
Employment creation	Give preference to the local people		MOLEC
Traffic Congestion	Ensure smooth traffic flow during pick-up and drop-off times especially on home weekends	Proponent	
Increased demand on electricity, water, sanitation)	Harvest rainwater for use in gardening and other activities Provide solar geysers and solar panels to provide energy Enforce energy and water conservation measures	Proponent	NORED, Namwater
Public Health and Safety from intruders	Appoint a health and safety personnel to monitor health protocols Install fence or boundary wall to demarcate off the school have a security officer all the time assigned at the school especially at the entrance to control who enters the school premises	Proponent	MOSS
Indoor Safety Issues	Always provide constant monitoring of student activities	Proponent	MoEAC
Increased risk for learners and instructors to contract diseases such as HIV/AIDS Covid 19	Offer sex education to students Strict measures and supervision to ensure that students do not engage in sexual activities Observe Covid 19 measures as stipulated by WHO and MOHSS	The proponent	MOHSS, MAEC
Injury from Car accidents	Install proper signage wherever possible Provide speed bumps and zebra crossings if possible Build barricades along the C41 (MR111) road between the school fence and the road reserve	The proponent	Roads authority

Injury in workshops and laboratories	Always have constant supervision of student activities in the workshops and laboratories Students should always have protective clothing whilst in the workshops and in the laboratories Always have access to a first aid kit	Proponent	MOEAC

6. Preparation of the bid documents

Work must be awarded as per the National Procurement Act, and the following items needs to be included in the Bid Document to help implement the EMP, at a crucial stage before awarding of tender. The bid document should have a Waste Management Plan, which should specify where waste materials needs to be disposed-off. Any tranches or burrow pits created as a result of this project needs to be rehabilitated, and such cost should be included as a cost item within construction bid documents.

The Public Health Officer from the Ministry of Health and Social Services to facilitate HIV/AIDS and TB education and related programs, who will occasionally be required to visit the site during the construction phase should be included as a cost item within construction bid documents. The communication Plan should be included in the construction phase bidding documents within the bid documents.
The Implementation of this Environmental Management Plan should be included as a cost item within all bid documents to be issued in respect of this project.

7. Conclusion

The proponent plays the most important role to ensure the successful implementation of this EMP. The proponent remains at the center of all the activities, and prepares all documents, supervision, and award of contractors that will be employed for different purposes for the DRFAIPC project.

This EMP will graduate as a legally binding document as soon as it is approved by the relevant authorities, and disobedience of this document will become punishable by law. This document was prepared based on the information that is provided at hand, and any changes or new development will require either change of the EMP or new environmental impact assessment.

This EMP will therefore serve as the bible of the DRFAIPC project, and a copy must be kept by the proponent at all time. This document is only valid until the project is successfully implemented. The proponent is responsible to compile and submit annual reports to the relevant authority, and such authority is mandated to regularly monitor compliance of the project.