Environmental and Social Management Plan for the Consulting Services for the Design and Supervision of Urban Infrastructure Lot 2 (Rundu Town) Under the Development Workshop Namibia Programme

Prepared for: Development Workshop Namibia

2 August 2025

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1. Introduction

The Rundu Infrastructure Development Project is a poverty-oriented urban upgrading initiative aimed at enhancing access to basic services in selected informal and underserved areas of Rundu, Kavango East Region. The project is funded by KfW and implemented by Development Workshop Namibia (DWN) in collaboration with Rundu Town Council (RTC). The intervention includes the construction and upgrading of water, sanitation, and electricity infrastructure across five discrete components, each targeted to improve the quality of life and reduce public health and environmental risks in vulnerable low-income areas.

This Environmental and Social Management Plan (ESMP) has been prepared as a standalone document to guide the management of environmental and social risks during the construction and implementation phases. It is based on the findings of the Environmental Scoping Report submitted to the Ministry of Environment, Forestry and Tourism (MEFT) and aligns with the Environmental Management Act (No. 7 of 2007) and its associated regulations. The ESMP also integrates international best practices, particularly the sustainability criteria of KfW and relevant IFC Performance Standards.

The ESMP sets out the specific mitigation and monitoring measures to be implemented by the contractor, under the oversight of the project proponent and supervising engineer, to ensure that construction proceeds in an environmentally responsible and socially acceptable manner. It includes detailed responsibilities, performance indicators, and reporting protocols, and is intended to form part of the legally binding obligations of all contractors and subcontractors working on the project.

2. Project Description

The Rundu Infrastructure Development Project is a site-specific urban upgrading initiative situated within the Ndama area on the western edge of Rundu, in the Kavango East Region. The project is spearheaded by Development Workshop Namibia (DWN), in collaboration with the Rundu Town Council (RTC), and supported through KfW development funding. The primary objective is to enable the delivery of affordable, serviced land in a manner that facilitates future township establishment and formal residential development for low-income households. All construction will occur on municipally owned land that is currently unoccupied.

To achieve this, the project will establish key bulk infrastructure across three sectors: roads, water supply, and electricity. The road component comprises the construction of a 6.915-kilometre gravel road network, which includes a 0.96-kilometre access road linking the area to the broader urban fabric of Rundu, as well as a 5.955-kilometre

perimeter road intended to demarcate the boundary of the planned development. This buffer road will serve multiple purposes, including access facilitation, stormwater management, and the definition of planning control limits for future township growth.

The water supply infrastructure includes the installation of a 500 cubic metre ground-level reservoir, which will function as a balancing tank to ensure reliable storage and supply. In addition, a 250 cubic metre elevated tank will be constructed to provide adequate pressure for downstream water distribution. To support both the immediate project area and adjacent settlements, the water system will include two bulk pipelines —one of approximately 1 kilometre in length supplying the DWN project area, and another of approximately 2.5 kilometres extending to the broader Ndama area. The design of these pipelines is integrated with the existing municipal water supply system and complies with technical standards established by NamWater and local authorities.

Electricity infrastructure under the project will include the installation of a 1-kilometre 11kV underground transmission line, implemented in compliance with NORED's technical specifications for medium-voltage infrastructure. To support current and future energy demands, two mini-substations will be constructed, each with an initial capacity of 315 kVA and provision for future upgrade to 630 kVA. This infrastructure is designed to serve future residential electrification needs and to align with Rundu's broader energy access planning objectives.

Construction is expected to commence in early 2026 and will span approximately 12 months. The infrastructure established through this project will form the foundation for sustainable urban expansion and contribute to addressing the growing backlog of serviced land in Rundu, while simultaneously improving municipal service delivery capacity.

3. Legal and Policy Framework

The Rundu Infrastructure Development Project is subject to a range of national environmental and sectoral laws, regulations, and policies, as well as international best practice guidelines due to the involvement of a foreign development partner. This Environmental and Social Management Plan (ESMP) has been prepared to ensure full legal compliance with Namibian legislation and to align with the environmental and social safeguards required by KfW and other international funding bodies.

3.1 National Environmental Legal Framework

The key piece of legislation governing environmental assessment and management in Namibia is the Environmental Management Act (No. 7 of 2007) and its associated Environmental Impact Assessment Regulations (2012). This Act requires that listed activities, such as the construction of roads, water reservoirs, and bulk

infrastructure, undergo environmental assessment and obtain an Environmental Clearance Certificate (ECC) from the Ministry of Environment, Forestry and Tourism (MEFT). The Act establishes principles of sustainable development, stakeholder participation, and preventative environmental management, all of which are embedded in this ESMP.

Additional applicable national legislation includes:

- Water Resources Management Act (No. 11 of 2013) – Governs the sustainable use and protection of Namibia's water resources. This Act is particularly relevant to the construction of water reservoirs and pipelines, and requires compliance with licensing procedures for water abstraction and discharge, where applicable.
- Public Health Act (No. 36 of 1919) and associated regulations – Provides the legal basis for the protection of public health, particularly in relation to waste management, waterborne disease prevention, and sanitation standards.
- Labour Act (No. 11 of 2007) – Regulates worker rights, occupational health and safety, and conditions of employment. All contractors must adhere to its provisions, including the requirement for a safe working environment and fair labour practices.
- Roads Authority Act (No. 17 of 1999) – Governs the construction and maintenance of road infrastructure in Namibia, and sets technical standards that are relevant to the design and alignment of the 6.915 km road network included in the project.
- Electricity Act (No. 4 of 2007) – Regulates electricity supply and infrastructure, including licensing, safety, and grid compliance. The implementation of the 11kV underground line and mini substations must align with this Act and the standards of the regional distributor, NORED.

3.2 Local Authority Legislation and Planning Instruments

As the project area falls under the jurisdiction of the Rundu Town Council (RTC), compliance with the Local Authorities Act (No. 23 of 1992) is required. This includes alignment with spatial development frameworks, servicing plans, and council by-laws governing water, sanitation, and land use planning. The project must also be consistent with the RTC's strategic infrastructure development objectives, particularly those related to urban expansion and pro-poor service delivery.

3.3 International Safeguards and Development Partner Standards

Given the financial support from KfW, the project is also expected to comply with the institution's Sustainability Guideline (2021), which outlines environmental and social principles, including:

- Avoidance or minimisation of adverse impacts;
- Informed stakeholder participation and transparency;
- Consideration of vulnerable groups;
- Implementation of effective mitigation and monitoring measures.

Where appropriate, the ESMP also reflects the principles of the IFC Performance Standards on Environmental and Social Sustainability (2012), particularly:

- Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts;
- Performance Standard 2: Labour and Working Conditions;
- Performance Standard 3: Resource Efficiency and Pollution Prevention.

3.4 Permitting and Approvals

The project must obtain the following approvals prior to implementation:

- Environmental Clearance Certificate from MEFT;
- Design approval and service connection agreements from NamWater and NORED;
- Construction permits and development consent from Rundu Town Council.

All construction activities must be undertaken in accordance with the approved Environmental Management Plan (EMP) and subject to monitoring and compliance inspections by designated authorities.

4. Environmental and Social Management Objectives

The primary purpose of this Environmental and Social Management Plan (ESMP) is to provide a structured framework for managing the environmental and social risks associated with the construction and implementation of the Rundu Infrastructure Development Project. It aims to ensure that all project activities are carried out in a manner that is compliant with applicable national legislation, municipal by-laws, and international best practices, while simultaneously contributing to sustainable urban development in Rundu.

The ESMP outlines the principles, procedures, and specific mitigation actions required to prevent, minimise, or offset negative impacts that may arise during the planning, construction, and early operational phases of the project. These impacts include, but are not limited to, dust and noise generation, the potential for soil erosion, vegetation loss, water contamination risks, safety hazards to workers and nearby communities, and disturbances to existing land use. The ESMP also seeks to promote positive impacts such

as temporary employment opportunities, skills development, and improved municipal infrastructure.

Among its core objectives, the ESMP aims to safeguard human health and safety by ensuring that occupational health and safety standards are adhered to, and that measures are in place to protect the public from construction-related hazards. It also strives to protect the natural environment by setting clear requirements for waste management, pollution control, and responsible use of natural resources such as water and land. Furthermore, it seeks to promote transparency and accountability by establishing procedures for stakeholder engagement, grievance redress, and performance monitoring.

In addition to providing clear mitigation and monitoring strategies, the ESMP defines the roles and responsibilities of all parties involved in project implementation, including the project proponent (DWN), contractors, supervising engineers, and regulatory authorities such as the Ministry of Environment, Forestry and Tourism (MEFT) and Rundu Town Council. This ensures that environmental and social management is not treated as an afterthought but is integrated into all aspects of project planning and execution.

Ultimately, this ESMP supports the achievement of the broader development goals of the project — namely, the provision of serviced land to low-income residents, improved access to essential municipal services, and the promotion of environmentally and socially responsible urban growth in Rundu.

5. Roles and Responsibilities

Effective implementation of the Environmental and Social Management Plan (ESMP) for the Karibib Bulk Infrastructure Development Project depends on clear delineation of roles and responsibilities among all stakeholders involved in project execution. This includes the project proponent, implementing agents, contractors, supervising engineers, and regulatory authorities. Each party is accountable for ensuring that mitigation measures, monitoring actions, and compliance obligations are executed in a timely and verifiable manner.

5.1 Project Proponent: Development Workshop Namibia (DWN)

As the project proponent and funding administrator, DWN holds overall responsibility for environmental and social compliance. DWN must:

- Ensure that the ESMP is included in tender and contract documentation.
- Oversee contractor and engineer compliance with all ESMP requirements.
- Liaise with regulatory authorities, including MEFT, for reporting and permit obligations.

- Facilitate stakeholder engagement and ensure effective grievance management.
- Submit monitoring and compliance reports to financiers (e.g. KfW) as required.

5.2 Implementing Consultant: SMEC Namibia

SMEC is responsible for detailed design, supervision of construction, and engineering quality control. Their role includes:

- Integrating mitigation measures into technical specifications and construction drawings.
- Supervising contractor implementation of environmental and social safeguards.
- Providing DWN with environmental performance updates and non-compliance reports.
- Ensuring all site staff are aware of ESMP requirements.

5.3 Environmental Consultant: Enviro Management Consultants Namibia (EMC)

EMC has prepared the Environmental Scoping Report and this ESMP and may be retained for periodic audits or support. EMC responsibilities include:

- Assisting with environmental training for site personnel.
- Conducting scheduled site inspections and environmental audits if contracted.
- Advising DWN and SMEC on corrective actions or adaptive management.
- Supporting reporting to MEFT and international donors, if required.

5.4 Construction Contractor

The principal contractor is responsible for implementing all mitigation measures during site establishment, construction, and decommissioning. Key obligations include:

- Appointing a dedicated Environmental Control Officer (ECO) to manage daily compliance.
- Implementing dust suppression, erosion control, spill prevention, and waste management practices.
- Ensuring all workers receive induction training on environmental and health & safety issues.
- Adhering to legal requirements, including permit conditions, working hours, and safety signage.
- Reporting any environmental incidents or chance archaeological finds immediately.

5.5 Rundu Town Council (RTC)

As the local authority and landowner, KTC plays a supporting role in:

- Monitoring compliance within municipal jurisdiction.
- Facilitating community engagement and grievance resolution.
- Coordinating service delivery and integration with existing infrastructure.
- Ensuring alignment with spatial planning and development priorities.

5.6 Ministry of Environment, Forestry and Tourism (MEFT)

The MEFT, through its Directorate of Environmental Affairs, is the competent authority for environmental regulation. Its responsibilities include:

- Reviewing and approving this ESMP and issuing the Environmental Clearance Certificate.
- Conducting ad hoc inspections or audits, as required.
- Reviewing environmental monitoring reports submitted by the proponent.
- Enforcing corrective actions in cases of non-compliance.

This guidelines of responsibilities ensures that environmental and social risks are managed collaboratively and transparently. It also allows for accountability throughout the project cycle, with built-in lines of communication between field teams, oversight engineers, regulatory bodies, and local stakeholders.

6. Environmental and Social Management Plan

ESMP implementation is a cyclical process that converts mitigation measures into actions and through cyclical monitoring, auditing, review and corrective action, ensures conformance with stated ESMP aims and objectives. Through monitoring and auditing, feedback for continual improvement in environmental performance must be provided and corrective action taken to ensure that the ESMP remains effective.

6.1 ESMP Administration

Copies of the ESMP shall be kept at the site office and will be distributed to all senior contract personnel. All senior personnel shall be required to familiarize themselves with the contents of this document.

6.2 Environmental Awareness Training

Before any work is commenced on the Site, the Contractor shall ensure that adequate environmental awareness training of senior site personnel takes place and that all construction workers receive an induction presentation on the importance and

implications of the ESMP. The Contractor shall liaise with the Engineer during establishment phase to fix a date and venue for the training and to agree on the training content.

The Contractor shall provide a suitable venue and ensure that the specified employees attend the course. The Contractor shall ensure that all attendees sign an attendance register, and shall provide the ER with a copy of the attendance register. The presentation shall be conducted, as far as is possible, in the employees' language of choice.

As a minimum, training should include:

1. Explanation of the importance of complying with the ESMP.
2. Discussion of the potential environmental impacts of construction activities.
3. The benefits of improved personal performance.
4. Employees' roles and responsibilities, including emergency preparedness.
5. Explanation of the mitigation measures that must be implemented when carrying out their activities.
6. Explanation of the specifics of this ESMP and its specification (no-go areas, etc.)
7. Explanation of the management structure of individuals responsible for matters pertaining to the ESMP.
8. The contractor shall keep records of all environmental training sessions, including names, dates and the information presented.

6.3 Public Participation

An on-going process of public participation shall be maintained during construction to ensure the continued involvement of interested and affected parties (I&APs) in a meaningful way. Public meetings to discuss progress and any construction issues that may arise shall be held at least every two months and more regularly if deemed necessary by the ER. These meetings shall be arranged by the ECO but shall be facilitated by the ER. The Contractor shall present a progress report at each public meeting. All I&APs that participated in or were informed during the EIA shall be invited to each of the public meetings.

6.4 Mitigation Measures

This section outlines the proposed mitigation measures aimed at avoiding, minimizing, or offsetting the potential negative environmental and social impacts associated with the DWN infrastructure projects in Karibib. Each measure is linked to a specific identified impact and includes actions to be implemented primarily during the construction and operational phases. The effectiveness of these measures is critical to ensuring that the project remains compliant with national and international environmental and social safeguards, while also enhancing the long-term sustainability and community acceptance of the development.

Key Components and Mitigation Measures

Component	Mitigation Measure	Responsible Party	Monitoring Indicator
Soil compaction and erosion	• Restrict heavy machinery movement to designated access roads and construction corridors. Clearly demarcate no-go zones to protect undisturbed soil. • Stabilize temporary spoil heaps with cover vegetation or biodegradable nets. • Shape slopes to stable gradients and compact gently to prevent rill and gully erosion. • Strip and store topsoil separately in low mounds (<2 m high). Cover stockpiles to prevent wind or rain erosion. Reuse stored topsoil for rehabilitation. • As construction advances, rehabilitate disturbed areas in phases to minimize the area of exposed soil at any given time. • Train construction personnel on best practices to minimize soil disturbance and report visible signs of erosion.	Contractor, Environmental Control Officer (ECO), Site Supervisor.	Inspect erosion control structures after rainfall events. Immediately repair damaged areas and replant vegetation if necessary.
Soil and water contamination (fuel/oil)	• Restrict refueling, servicing, and lubrication of machinery to designated areas equipped with bunded platforms and impermeable surfaces to contain spills. • Store fuels, oils, and other hazardous substances in secure containers within bunded areas. Ensure bunds can hold at least 110% of the volume of the largest container. • Provide fully stocked spill response kits at all fuel handling and storage locations. Train all site personnel in spill response procedures and environmental awareness. • Place drip trays beneath stationary machinery, fuel tanks, and any vehicle showing signs of	Contractor; HSE Officer	Conduct weekly inspections of fuel storage areas, machinery, and drip trays to detect and fix leaks early.

	leakage. • The contractor shall develop and implement an incident response plan detailing steps to be taken in the event of a spill or leak, including immediate containment and reporting procedures. • Collect used oil, filters, and oily rags in sealed containers. Dispose of them via licensed waste handlers in accordance with Namibian hazardous waste regulations.		
Land degradation at borrow pit or spoil sites due to gravel sourcing and material spoil disposal.	• Carefully select borrow pit and spoil sites in consultation with the Environmental Control Officer (ECO), prioritizing disturbed or degraded land and avoiding ecologically sensitive or agriculturally productive areas. • Ensure that all borrow pits are permitted under the Environmental Management Act (No. 7 of 2007) and that separate permits are obtained if required under the Minerals (Prospecting and Mining) Act (No. 33 of 1992). • Strip and stockpile topsoil separately before excavation. Store it in windrowed heaps no higher than 2 meters and protect with vegetation or matting to prevent erosion. • Limit excavation to the demarcated area. Avoid undercutting or creating unstable slopes. Maintain gentle side slopes to reduce erosion and facilitate rehabilitation. • Dispose of excess spoil at designated spoil sites. Compact spoil material and cover with topsoil to blend with surrounding terrain. Where possible, contour to natural topography. • Immediately rehabilitate borrow pits after use. Re-grade the land, replace topsoil, and revegetate using locally appropriate native species to restore ecological function and reduce erosion risks. • Engage local landowners or community representatives when selecting and closing borrow sites, especially if on communal or resettlement land.	Contractor; Environmental Control Officer	Regularly inspect borrow and spoil sites during and after construction. Include these areas in the environmental audit reports. Rectify any non-compliance or erosion issues promptly.
Loss of topsoil and land degradation	• Stockpile and berm topsoil separately and reuse for landscaping. • Minimize stripping areas which are not part of the project scope. • Avoid working during heavy rains.	Contractor	Inspect boundaries and vegetation clearance areas weekly. Check for compliance with approved footprint and presence of protected

			species.
Surface water sedimentation	• Install silt fences and sediment traps where required. • Divert runoff to ensure proper surface water drainage management. • Limit works during rainy season and inspect controls after storms.	Contractor; Environmental Control Officer	Inspect silt fences and sediment traps after rainfall. Monitor water clarity and sediment load.
Altered local drainage patterns from the construction of the road and reservoir.	• Conduct a pre-construction drainage assessment to map natural drainage lines. Incorporate these into the road and reservoir design to maintain natural hydrological connectivity. • Provide adequately sized culverts, drifts, and side drains at all natural water flow paths to ensure uninterrupted flow. Structures should be designed to accommodate peak seasonal runoff. • Install erosion control structures (e.g. rock rip-rap, gabions, check dams) at culvert inlets and outlets, drainage channels, and embankments to stabilize flow and prevent scouring. • Where feasible, schedule earthworks outside of peak rainfall periods to reduce disturbance of wet soils and sediment-laden runoff. • Locate stockpiles and spoil away from drainage lines and stormwater channels. Install berms or silt fences to prevent runoff contamination. • Maintain or re-establish vegetation buffers along natural drainage lines to reduce runoff velocity and trap sediments.	Contractor; Environmental Control Officer	Regularly inspect drainage infrastructure during and after construction for blockages or damage. Clear culverts and drains of debris as needed.
Air pollution (dust, emissions)	• Regularly water exposed surfaces such as access roads, construction zones, and stockpiles, particularly during dry and windy periods. Use recycled or non-potable water where possible. • Enforce strict speed limits (e.g., ≤30 km/h) on unpaved site roads to reduce dust generation. • Ensure all construction vehicles and equipment are regularly serviced to meet emissions standards and avoid excessive smoke or particulate emissions. • Cover trucks transporting sand, gravel, or soil with tarpaulins to prevent material loss and airborne dust during transit. • Locate stockpiles away from residential areas and sensitive receptors. Stabilize using water spraying, vegetation cover, or dust-binding agents as needed.	Contractor, Site Supervisor, Health & Safety Officer, Environmental Control Officer (ECO).	Monitor dust levels near sensitive receptors using handheld meters or visual inspection logs. Check vehicle maintenance logs.

	• Clear only the areas necessary for construction to minimize disturbed bare soil surfaces. • Where construction occurs near populated areas, monitor dust levels (e.g., PM_{10} or $PM_{2.5}$) using handheld meters or visual inspection logs to ensure compliance with local standards. • Provide dust masks and respiratory protection to workers operating in high-dust areas, particularly during bulk earthworks and dry seasons.		
Noise	• Limit noisy construction activities to standard working hours (typically 07:00–17:30). Avoid night-time or early-morning works unless absolutely necessary and approved by authorities. • Use modern, well-maintained machinery fitted with silencers and mufflers to reduce noise emissions. • Establish physical buffer zones (e.g., noise barriers or earth bunds) between active construction sites and sensitive receptors such as homes, schools, or clinics. • Position stationary noise-generating equipment (e.g., generators, batching plants) as far away as possible from community areas. • Inform local communities in advance about particularly noisy phases of construction providing timelines and contact points. • Provide workers with appropriate hearing protection (e.g., earmuffs or earplugs) and rotate staff to minimize exposure. • Maintain a grievance log and community liaison procedure to record and respond to any complaints about excessive noise. • No working is allowed on Sundays and Public holidays.	Contractor, Site Supervisor, Health & Safety Officer, Environmental Control Officer (ECO).	Periodically monitor ambient noise levels at the site boundary and at sensitive receptors to ensure compliance with WHO and Namibian thresholds.
Vibration	• Conduct a pre-construction baseline survey of structures in proximity to the construction area. Identify any buildings, heritage features, or facilities sensitive to vibration (e.g., clinics, schools). • Avoid or minimize use of vibration-intensive equipment near sensitive receptors. Where compaction or pile driving is necessary, use lower-impact equipment or stage activity over time to limit intensity.	Contractor, Environmental Control Officer (ECO), Site Engineer, Health and Safety Officer.	Visual inspection before commencement.

	• Maintain a safe buffer distance (e.g., 50–100 m) between vibration-generating machinery and nearby occupied structures unless vibration is shown to be within acceptable thresholds.		
Loss of vegetation and habitat	• Restrict vegetation clearance strictly to the approved project footprint. Mark or fence off construction boundaries to prevent accidental encroachment into surrounding natural areas. • Where possible, redesign or slightly realign infrastructure to avoid mature trees, riparian vegetation, and known habitat of protected or rare species. • Conduct a walk-through ecological survey to identify any protected species (as per the Forestry Act No. 12 of 2001 or Nature Conservation Ordinance No. 4 of 1975). Obtain tree harvesting or relocation permits if required. • Strip and store topsoil containing native seedbanks separately for reapplication during rehabilitation to aid natural regeneration. • Educate workers about ecological sensitivity, protected species, and the importance of avoiding unnecessary disturbance of vegetation and wildlife.	Contractor, Environmental Control Officer (ECO), Forestry Directorate (if applicable), Design Engineer.	Inspect boundaries and vegetation clearance areas weekly. Check for compliance with approved footprint and presence of protected species.
Disturbance to fauna	• Rescue trapped fauna and relocate to a safe area. • Prohibit hunting by workers.	Contractor; Environmental Control Officer	Record all fauna rescues and conduct weekly checks for wildlife presence or signs of disturbance.
Invasive species introduction	• Inspect and clean machinery on a regular basis. • Monitor for invasive plants and remove invasives immediately.	Contractor; Environmental Control Officer	Inspect site monthly for invasive plants and verify machinery cleaning logs.
Solid and hazardous waste	• The Contractor shall develop and implement a site-specific Waste Management Plan in line with the Environmental Management Act (No. 7 of 2007) and international good practice. Include procedures for segregation, storage, transportation, and disposal. • Segregate waste at source into recyclables, general waste, and hazardous waste. Label and store each stream in appropriate containers with lids.	Contractor, Environmental Control Officer (ECO), HSE Officer, Waste Disposal Contractor.	Maintain a waste register, including types, volumes, and disposal destinations. Monitor waste volumes monthly and report as part of

	• Collect hazardous waste (e.g., oil filters, chemical containers, old batteries) in sealed, bunded containers. Store separately and dispose of via licensed hazardous waste contractors. • Use materials efficiently to reduce offcuts and surplus. Order bulk materials with minimal packaging and reuse materials where possible. • Dispose of general waste at an approved municipal landfill. Prohibit any burning or illegal dumping of waste onsite or in nearby bushland. • Provide adequate sanitation (e.g., mobile toilets) for workers and ensure that waste is emptied and managed regularly by licensed providers. • Train workers on proper waste handling, the importance of segregation, and the risks of hazardous waste exposure.		environmental compliance.
Traffic disruption and accidents	• Develop a traffic management plan and it need to be approved by the R.E. • Install appropriate road signs where required according to the traffic management plan. • Avoid construction material deliveries during peak hours. • Appoint and train flag-people to ensure effective traffic management at construction activities.	Contractor; Site Supervisor	Review traffic logbooks and incident reports weekly. Confirm signage and flag personnel are in place.
Community safety risks	• Erect fencing at the construction camp. • Provide safe walkways for the local communities to use. • Enforce workers PPE and construction signage. • Workers not wearing required PPE shall not be allowed to work. • Limit public access to the construction site.	Contractor	Inspect fencing, signage, and pedestrian routes weekly. Record PPE compliance and public access control.
Cultural heritage / archaeological disturbance	• Train team in Chance Finds Procedure. • Halt work if artifacts are found and notify National Heritage Council or Police (in the case of graves) • Any heritage find must be properly documented (GPS location, photos, description) and reported to the National Heritage Council for evaluation and decision-making. • Do not remove, alter, or disturb any cultural or archaeological material without a permit issued under the National Heritage Act (No. 27	Contractor, Environmental Control Officer (ECO), National Heritage Council, Traditional Authorities.	Include regular site inspections by the ECO, especially during initial clearing and excavation phases when discoveries are most likely.

	of 2004).		
Occupational health risks	• Provide required PPE to the workers as stipulated in the Labour Law. • Conduct health induction when new workers are recruted. • Monitor compliance with Labour Act. • Maintain on-site first aid kits and make sure there are at least one person from the contractor trained in First-Aid.	Contractor; HSE Officer	Audit PPE distribution logs and first aid kit status monthly. Confirm staff trained in First Aid.
Community health risks	• Implement dust suppression (e.g., watering roads) and enforce noise limits near community areas (see related mitigation measures). • Ensure that construction camps and work areas are equipped with proper sanitation and solid waste disposal facilities to avoid contamination of local water sources. • Collaborate with local health officials and NGOs to deliver health education campaigns on hygiene, STIs, substance abuse, and safety for both workers and community members. • Enforce speed limits near populated areas, provide flagmen and signage at construction crossings, and maintain safe pedestrian access for residents. • Maintain first aid kits on-site and ensure that emergency medical services are accessible. Develop and communicate emergency response procedures. • Locate worker accommodation away from residential zones and enforce a Code of Conduct to reduce negative social interactions and the potential for gender-based violence (GBV) or exploitation. • Establish and publicize a grievance mechanism for community members to report concerns related to health, safety, or contractor behavior.	Contractor; Environmental Control Officer	Monitor availability of sanitation, dust suppression, and emergency services weekly. Maintain a grievance log.
Livelihood disruption (access/trading)	• Consult with affected vendors via the appointed CLO. • Provide temporary relocation where required and re-establish access post-construction.	Proponent; Contractor	Track consultations with vendors and record temporary relocations and re-establishment efforts.
Visual impact	• Keep site organized and clean. • Screen storage areas from adjacent residents or schools.	Contractor	Weekly inspections to assess site

	• Rehabilitate exposed zones post-construction.		cleanliness, screening, and rehabilitation progress.
Cumulative development pressures	• Coordinate schedules with Town Council. • Implement phased works. • Align with urban plans.	Proponent; RTC	Review coordination minutes with Town Council and work schedule alignment logs.
Job creation for local unskilled labour	• Prioritize local hiring. • Advertise positions publicly and use the existing social structures in collaboration with the local political structures / offices. • Offer short-term contracts with fair wages in line with the Labour Law.	Contractor; Proponent	Maintain employment register disaggregated by origin and contract type.
Skills development and training	• Provide on-site training and issue certificates of competence. • Promote skilled workers into team leader roles.	Contractor	Track number of training sessions, attendance, and certificates issued.
Increased demand for local goods/services	• Procure food, water, and materials locally. • Support small vendors through early payments and open tenders/agreements.	Contractor	Maintain procurement records showing local supplier engagement and spend.
Improved access to sanitation infrastructure	• Ensure proper commissioning. • Connect households efficiently while maintaining community engagement.	RTC; Contractor	Inspection reports of commissioned facilities and household connection records.
Improved public health outcomes	• Monitor sewer system effectiveness. • Educate community on safe sanitation practices.	RTC; Health Dept.	Health outreach records and feedback from local clinics on sanitation-linked issues.
Increased property values in serviced areas	• Ensure reliable infrastructure performance; integrate with town planning to attract investment.	RTC; Town Planners	None
Enhanced municipal service delivery capacity	• Train municipal staff; maintain infrastructure records; establish monitoring protocols for performance.	RTC	Track training sessions for municipal staff

			and updates to infrastructure records.

Appendix A at the end of this document has an Action Table and"To-Do" and "Not – To – Do" list which form part of this ESMP and the measures should be implemented as such.

6.5 Non-Compliance

A) Procedures

The Contractor shall comply with the environmental and social specifications and requirements on an on-going basis and any failure on his part to do so will entitle the ER to impose a penalty. In the event of non-compliance the following recommended process shall be followed:

1. The ER shall issue a notice of non-compliance to the Contractor through the ECO, stating the nature and magnitude of the contravention.

2. The Contractor shall act to correct the non-conformance within 24 hours of receipt of the notice, or within a period that may be specified within the notice.

3. The Contractor, through the ECO, shall provide the ER with a written statement describing the actions to be taken to discontinue the non-conformance, the actions taken to mitigate its effects and the expected results of the actions.

4. In the case of the Contractor failing to remedy the situation within the predetermined time frame, the Engineer shall impose a monetary penalty based on the conditions of contract.

5. In the case of non-compliance giving rise to physical environmental damage or destruction, the Engineer shall be entitled to undertake or to cause to be undertaken such remedial works as may be required to make good such damage and to recover from the Contractor the full costs incurred in doing so.

6. In the event of a dispute, difference of opinion, etc. between any parties with regard to or arising out of interpretation of the conditions of the ESMP, disagreement regarding the implementation or method of implementation of conditions of the ESMP, etc. any party shall be entitled to require that the issue be referred to specialists for determination.

7. The Engineer shall at all times have the right to stop work and/or certain activities on site in the case of non-compliance or failure to implement remedial measures.

B) Offenses and Penalties

Where the Contractor inflicts non-repairable damage upon the environment or fails to comply with any of the environmental specifications, he shall be liable to pay a penalty fine over and above any other contractual consequence.

The Contractor is deemed NOT to have complied with this Specification if:

a. within the boundaries of the site, site extensions and haul/access roads there is evidence of contravention of the Specification;

b. environmental or human damage due to negligence;

c. the Contractor fails to comply with corrective or other instructions issued by the ER within a specific time;

d. the Contractor fails to respond adequately to complaints from the public.

Penalties for the activities detailed below, will be imposed by the ER on the Contractor and/or his Subcontractors:

a.	Actions leading to erosion	A penalty equivalent in value to the cost of rehabilitation plus 20%
b.	Oil spills	A penalty equivalent in value to the cost of clean-up operation plus a N$ 3000 fine per occurance.
c.	Damage to indigenous vegetation	A penalty equivalent in value to the cost of restoration plus N$ 15 000
d.	Damage to sensitive environments	A penalty equivalent in value to the cost of restoration plus N$ 15 000
e.	Damage to cultural sites	A penalty to a maximum of N$100 000 shall be paid for any damage to any cultural/ historical sites
f.	Damage to trees	A penalty to a maximum of N$15 000 shall be paid for each tree removed without prior permission, or a maximum of N$5 000 for damage to any tree, which is to be retained on site.
g.	Damage to natural fauna	A penalty to a maximum of N$15 000 for damages to any natural occurring

		animals.
h.	Any persons, vehicles, plant, or thing related to the Contractors operations within the designated boundaries of a "no-go" area	N$5,000
j.	Litter on site	N$5,000
k.	Deliberate lighting of illegal fires on site	N$ 5,000
l.	Any person, vehicle, item of plant, or anything related to the Contractors operations causing a public nuisance	N$5,000

m. Sewage leaks from any toilet or sewage drain /tank - N$10,000

- Penalties may be issued per incident at the discretion of the Engineer. The Engineer will inform the Contractor of the contravention and the amount of the fine, and will deduct the amount from monies due under the Contract.
- For each subsequent similar offense the fine may, at the discretion of the ER, be doubled in value to a maximum value of N$10, 000.
- Payment of any fines in terms of the contract shall not absolve the offender from being liable from prosecution in terms of any law.
- In the case of a dispute in terms of this section, the Engineer shall determine as to what constitutes a transgression in terms of this document.

6.6 Grievance Mechanisms and Processes

A grievance is a concern or complaint raised by an individual or a group within communities affected by activities related to the operations of an organization. Such impacts could be from activities on implementation of a particular project by public or private entity. A grievance is raised because of the uncomfortable and unacceptable state perceived will occur or actual by an Individual or group or a community, result of an introduced event to a particular area.

A grievance mechanism is described as a project instrument that aims to give stakeholders or interested and affected parties (I&APs) the right to report all project-

related inadequacies, the right to denounce any kind of human rights violation or detrimental event of the project and to request redress or cessation of the detrimental event.

The instrument when implemented allows resolving grievances of affected individuals or communities at earliest localized level or within project's immediate domain, preventing escalation to unmanageable levels. This will resultantly benefit the aggrieved parties and the proposed project implementors.

The Contractor shall draft such a document indicating the process towards seeking redressal of grievances at different scales of operation. The following is a framework for such a document:

Table 1: Grievance Regress Nethodology

Step	Action	Responsibility
1	**Grievance Submission** – Complaints can be submitted verbally, in writing, or anonymously.	Community member / IAP
2	**Grievance Logging** – All grievances are entered into a formal grievance register.	Environmental Control Officer
3	**Acknowledgement** – Grievance receipt is acknowledged within 5 working days.	Environmental Control Officer
4	**Assessment & Investigation** – Complaint is reviewed, investigated, and solution proposed.	Project Management / ECO
5	**Resolution & Response** – Response is communicated to the complainant within 15 working days.	Project Manager / DWN
6	**Closure & Documentation** – If resolved, grievance is closed with written confirmation.	ECO / Grievance Committee
7	**Escalation** – If not resolved, grievance is referred to the Karibib Town Council or MEFT.	Grievance Committee

- Grievances can be submitted at on-site complaint boxes, municipal offices, DWN offices or via email/telephone;
- The process will accommodate illiterate, elderly, and marginalized persons through oral submissions;
- All information related to the GRS will be made available in local languages (e.g. Afrikaans, Damara/Nama).

6.7 Environmental Auditing

Environmental audits should be conducted at least once every three months during construction. Benefits derived from the audit process might include:

- identification of environmental risk;
- development or improvement of the environmental management system;
- avoidance of financial loss;
- avoidance of legal sanctions;
- increase in staff awareness;
- identify potential cost savings;
- improve dealings with employees, environmental groups, the community, regulators, media, shareholders, or insurance & finance institutions; and
- establish a history of environmentally responsible operations, e.g. through environmental incident reports, environmental monitoring & recording, & reporting to committees or Authorities.

Commonly, the environmental audit of a site will cover all management procedures, operational activities & systems, and environmental issues. The environmental audit will be compiled objectively and be conducted by an independent, competent entity.

7. Conclusion

This Environmental and Social Management Plan (ESMP) provides a comprehensive framework for identifying, mitigating, and monitoring the environmental and social risks associated with the implementation of the Rundu Infrastructure Development Project. The plan is grounded in the findings of the Environmental Scoping Report and aligns with applicable Namibian environmental legislation and municipal regulations, while also reflecting best practices in sustainable infrastructure development.

The ESMP outlines practical, site-specific measures to minimise negative impacts such as vegetation loss, soil erosion, water contamination, waste generation, and health and safety risks. It also promotes enhancement of positive outcomes, particularly through local employment, capacity building, and improved service delivery for underserved areas in Rundu, such as Ndama.

Successful implementation of this plan depends on the commitment of all stakeholders — including Development Workshop Namibia (DWN), the appointed contractor, the Rundu Town Council, and oversight bodies such as the Ministry of Environment, Forestry and Tourism. Clear roles and responsibilities, regular monitoring, and adaptive management will be essential to ensure compliance, maintain transparency, and promote accountability throughout the construction phase.

Ultimately, this ESMP supports the project's broader development objective: to provide serviced land and essential infrastructure to low-income households in a socially inclusive and environmentally responsible manner. With diligent application of the mitigation measures outlined herein, the project can achieve its goals while safeguarding both people and the environment.

APPENDIX A

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN CHECKLIST

This document outlines the key elements of an Environmental and Social Management Plan (ESMP) Action Table, capturing the mitigation measures that need to be implemented in the context of the Project activities. The ESMP includes measures derived from the KfW standard bidding documents

Development Workshop Namibia (DWN) together with the contractor - shall use this template as guidance and amend it to the Project specifications, characteristics and risks as identified through the Site Assessment Tool. The ESMP Actions Table The ESMP Actions Table is structured as follows:

A – General requirements for ESHS Management,
B – Protection of Environment
C – Workers Health & Safety
D – Labour and Relations with Local Communities

This ESMP Action Table shall complement the **ESMP Report** prepared for the Project. The “Do and Don’t Table” (Appendix 1) provides guidance on general best practices to be used during (construction) works. These recommendations are to be used regardless of the content of the ESMP.

This checklist is a working document and should be reviewed / updated as required.

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
A: General Requirements for ESHS Management				
A1[1]. Responsibilities and Liabilities[2]	Ensure that all workers, suppliers and possible subcontractors are familiar and comply with the ESHS requirements and specifications of this ESMP.	Induction training performed and recorded for new and temporary employees. Contracts with subcontractors and suppliers	Contractor DWN	Review of induction / training records Review of Contracts to ensure that Project requirements are included
A4. Resources allocated to ESHS Management	Assign ESHS responsible staff[3] and define the requirements and responsibilities. Define person(s) responsible for contact with stakeholders (Relations officer or Community Liaison officer)	Document assigned responsibilities. Inform the relevant authorities/stakeholders about the ESHS responsible staff.	Contractor/ DWN	Review assignment of ESHS responsibilities. Records of notification to stakeholders
A6. Reporting	Reporting of progress and incidents, accidents, observations, near misses. These reports be submitted monthly to DW and included non-compliance summaries.	Final Project-specific ESMP (note monitoring and reporting requirements) Records of ESHS and incident reporting	Contractor/ DWN	Review E&S Monitoring Checklist E&S audits
A7. Code of Conduct	Establish a Code of Conduct taking into consideration legislation, safety rules, substance abuse, environmental sensitivity, communicable diseases, gender issues (sexual harassment), respect for local beliefs and customs, community interactions etc.	Code of Conduct in place and rules shared with personnel. COC activities shall form part of the "Toolbox Talks" topics and recorded in the Environmental File.	Contractor/ DWN	Review of Code of Conduct induction records Review of reported punishable or misconduct behaviour Review of grievance records

1 Numbering is not continuous because it refers to the items of KfW standard bidding documents

2 Reminder: Bold and underlined ESMP items are always to be considered, regardless of the results of the Site Assessment.

3 Note: in many legislations an ESHS manager is required on sites employing 50 workers or more

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
A: General Requirements for ESHS Management				
A8. ESHS Training	Provide induction and training and awareness to the workforce regarding ESHS risks and mitigation measures (including indirect workers) tailored to Project scope. Refer to Section 12.3 of the Environmental Assessment Report. **ESHS Training**: Include **refreshers every 6 months** and note that training must be documented with attendance registers.	Training performed and recorded Attendance registers	Contractor/ DWN	Review of ESHS induction and training records

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
B. Protection of the Environment				
B10. Protection of adjacent areas	Ensure to keep the buffer distances from permanent water course and outside of floodable areas; sensitive urban services and buildings (health centre, school, water supply for populations); any housing;	Marking the borders of works site boundaries in line with given limits and usage of warning signs	Contractor/ DWN	Site inspection prior to commencement of activities.
	Ensure that work site boundaries and limits are in accordance with plans agreed upon in advance. All construction activities should be carried out within boundaries.	Marking the borders of works site boundaries and usage of warning signs	Contractor/ DWN	Site inspection prior to commencement of activities.

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
B. Protection of the Environment				
	Protect the soils by implementing the following: Restrict heavy machinery movement to designated access roads and construction corridors. Clearly demarcate no-go zones to protect undisturbed soil. Stabilize temporary spoil heaps with cover vegetation or biodegradable nets. Shape slopes to stable gradients and compact gently to prevent rill and gully erosion. Strip and store topsoil separately in low mounds (<2 m high). Cover stockpiles to prevent wind or rain erosion. Reuse stored topsoil for rehabilitation. As construction advances, rehabilitate disturbed areas in phases to minimize the area of exposed soil at any given time. Train construction personnel on best practices to minimize soil disturbance and report visible signs of erosion.	No impacts identified in the adjacent environment	Contractor/ DWN	Site assessment prior to site selection. Site inspection prior to commencement of activities. Regular monitoring of natural resources.
	Protect excavation works with cut off ditches to prevent water from entering excavations.	No water entering excavations	Contractor/ DWN	Site inspection
	Restrict excavation activities during periods of intense rainfall. Use temporary bunding to reduce the risk of sediment, oil or chemical spills to the receiving waters.	No excavation during intense rainfall	Contractor/ DWN	Check weather forecast and inspect the site conditions prior to excavation.
	Minimise visual impacts by good house-keeping and erecting screens if required	Visual inspection and comparison with adjacent undisturbed areas.	Contractor/ DWN	Site inspection

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
B. Protection of the Environment				
	After construction, form reshaped land so that it is inherently stable, adequately drained and suitable for the desired long-term land use and allows natural regeneration of vegetation	Visual inspection and comparison with adjacent undisturbed areas.	Contractor/ DWN	Site inspection at completion
B11. Selection of borrow areas, backfill material stockpile sites and access road	Carefully select borrow pit and spoil sites in consultation with the Environmental Control Officer (ECO), prioritizing disturbed or degraded land and avoiding ecologically sensitive or agriculturally productive areas. Ensure that all borrow pits are permitted under the Environmental Management Act (No. 7 of 2007) and that separate permits are obtained if required under the Minerals (Prospecting and Mining) Act (No. 33 of 1992). Strip and stockpile topsoil separately before excavation. Store it in windrowed heaps no higher than 2 meters and protect with vegetation or matting to prevent erosion. Limit excavation to the demarcated area. Avoid undercutting or creating unstable slopes. Maintain gentle side slopes to reduce erosion and facilitate rehabilitation. Dispose of excess spoil at designated spoil sites. Compact spoil material and cover with topsoil to blend with surrounding terrain. Where possible, contour to natural topography. Engage local landowners or community representatives when selecting and closing borrow sites or stockpile areas.	Designated areas selected	Contractor/ DWN	Once during site selection

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
B. Protection of the Environment				
	Locate stockpile areas in areas where trees can act as buffers to prevent dust pollution	Designated areas selected	Contractor/ DWN	Once during site selection
	Deposit any excess material in areas approved by local authorities	Designated areas selected	Contractor/ DWN	Once during site selection
	Locate disposal site on low value land.	Designated areas selected	Contractor/ DWN	Once during site selection

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
B. Protection of the Environment				
B12. Pollution prevention	Ensure all works carried out minimise pollution risk (e.g. liquid effluents, air emissions, noise and vibration management, vehicle and equipment maintenance and selection, fuel, oil and chemical storage and handling) including the whole duration of the Project. The following detailed measures are required: Restrict refueling, servicing, and lubrication of machinery to designated areas equipped with bunded platforms and impermeable surfaces to contain spills. Store fuels, oils, and other hazardous substances in secure containers within bunded areas. Ensure bunds can hold at least 110% of the volume of the largest container. Provide fully stocked spill response kits at all fuel handling and storage locations. Train all site personnel in spill response procedures and environmental awareness. Place drip trays beneath stationary machinery, fuel tanks, and any vehicle showing signs of leakage. The contractor shall develop and implement an incident response plan detailing steps to be taken in the event of a spill or leak, including immediate containment and reporting procedures. Collect used oil, filters, and oily rags in sealed containers. Dispose of them via licensed waste handlers in accordance with Namibian hazardous waste regulations.	Ensure that potential pollutants are not stored and handled within 50 m of sensitive receptors (particularly watercourses). Visual inspections is required to identify leaks or any other pollution risks	Contractor/ DWN	Regular site inspection Review of grievance records

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
B. Protection of the Environment				
	Refueling areas shall be bunded with an impermeable floor Spill kits, drip trays, and training on spill response will be enforced by the contractor.	Response records Fuel/oil storage inventory and labeling Training logs on spill response	Contractor/ DWN	Weekly inspection logs of bunded areas, drip trays, and spill kits.
B13. Effluents	Ensure appropriate containment and storage of construction wastewater, including sanitary water. No untreated effluent is discharged. Maintain functional sewerage systems, promote hygiene awareness, monitor health indicators. Aligns with IFC PS4 public health goals.	No untreated wastewater discharge Documentation and control measures of disposed sewage	Contractor/ DWN Contractor/ DWN	Regular site inspection Review of grievance records Review disposal records
B14. Emissions and dust	Use to the extent possible, vehicles in appropriate technical conditions. Provide emissions control equipment where applicable (e.g. filters).	Technical Specification Sheet	Contractor/ DWN	Prior to commencement of works and each time new equipment/vehicle is used at the site. Review of grievance records Visual inspection on regular basis
	Use low sulphur content fuels, in line with legal provisions in force as well as local availability.	Technical Specification Sheet	Contractor/ DWN	Regular documentation inspection
	Ensure vehicles are switched off when not in use.	Engines switched off	Contractor/ DWN	Driver training Regular site inspection
	Best practice to ensure minimisation of dust emissions (e.g. proper stockpiling, watering etc.) during dry and windy conditions and transportation.	Watering conducted, no dust emissions are observed, no workers' grievances	Contractor/ DWN	Regular site inspection Review of grievance records

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
B. Protection of the Environment				
	Ensure speed limits (30km/h) on site and when passing local receptor areas. Sensitise drivers. Minimise drop heights for materials.	Speed signs installed Training performed and recorded Accident/incident reports	Contractor/ DWN	Random site inspection Review of grievance records Review of accident/incident records Review of training records
B15.a: Noise	Avoid operations and vehicle movements at night.	Limit noisy activities to between 07:00–18:00.	Contractor/ DWN	Random site inspection Review of grievance records Review of accident/incident records Review of training records

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
B. Protection of the Environment				
	Locate stationary equipment (such as power generators) as far as possible from nearby receptors (e.g. worker resting areas, populated areas and environmentally sensitive areas). Make sure that noise levels don't exceed 80db in case of equipment or vehicle use. Maintain and service construction machinery regularly. Provide advance notice to communities before high-noise activities. Provide workers with appropriate hearing protection (e.g., earmuffs or earplugs) and rotate staff to minimize exposure. Maintain a grievance log and community liaison procedure to record and respond to any complaints about excessive noise. No working is allowed on Sundays and Public holidays.	Distances between equipment and receptors are kept Maintenance records	Contractor/ DWN	Review of grievance records Monitor noise levels in case of complaints

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
B. Protection of the Environment				
B15.b|: Vibration	Conduct a pre-construction baseline survey of structures in proximity to the construction area. Identify any buildings, heritage features, or facilities sensitive to vibration (e.g., clinics, schools). Avoid or minimize use of vibration-intensive equipment near sensitive receptors. Where compaction or pile driving is necessary, use lower-impact equipment or stage activity over time to limit intensity. Maintain a safe buffer distance (e.g., 50–100 m) between vibration-generating machinery and nearby occupied structures unless vibration is shown to be within acceptable thresholds.	Distances between equipment and receptors are kept Maintenance records	Contractor/ DWN	Review of grievance records Monitor noise levels in case of complaints
B16. Waste Management	Identify waste management facilities and waste management contractors. Ensure disposal through waste contractors licensed for treatment/removal/recycling of each of the waste types.	Waste management through licensed contractors, if feasible Waste management contracts Waste transfer notes	Contractor/ DWN	Inspect waste management facilities Proof of contractors' certifications Review of waste transfer records
	The Contractor shall develop a Waste Management Plan (WMP) in line with local and international best practices. Conduct monthly waste audits and include KPIs such as % of waste recycled or reused.	WMP approval and monitoring.	DWN	Review of WMP every 6 months.
	Ensure that all wastes produced are properly collected, segregated, stored, transported and treated	Waste collection areas existent, waste inventories Waste transfer notes	Contractor/ DWN	Regular site inspection Review of waste inventories Review of waste transfer records

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
B. Protection of the Environment				
	Minimise the waste production to the extent possible.	Records of waste production are kept Waste Management Plan Training performed and recorded	Contractor/ DWN	Monitor (e.g. monthly) the amount of waste produced Review of training records
	Document all waste related operations (type of wastes, quantities produced etc.).	Storage, transport and treatment of waste is documented Waste transfer notes Waste inventories	Contractor/ DWN	Review of waste transfer records Review of waste inventories
	Prohibit open burning and illegal dumping.	Visual inspection for fire remains	DWN	Regular site inspection
	Prevent littering by worker awareness.	Visual inspection	Contractor/ DWN	Regular site inspection Toolbox Talks records on littering awareness
	Water pollution prevention in line with the Water Resources Management Act, IFC PS3	Permitting and licensing Pollution Control Obligations Monitoring and enforcement	Contractor/ DWN	Review of permits Site inspection

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
B. Protection of the Environment				
	Appropriate and safe storage of fuels, construction materials, wastes and any materials that can cause spills. Store hazardous materials on bunded surfaces with impermeable floors; Provide drip trays for stationary equipment Train workers in spill response and proper waste handling, the importance of segregation, and the risks of hazardous waste exposure. Provide adequate sanitation (e.g., mobile toilets) for workers and ensure that waste is emptied and managed regularly by licensed providers.	Safe storage of materials Spill response procedure Spill response and remediation equipment in place.	Contractor/ DWN	Regular site inspection
B17. Vegetation clearing	Restrict vegetation clearance strictly to the approved project footprint. Mark or fence off construction boundaries to prevent accidental encroachment into surrounding natural areas. Bio-diversity walk through survey is required before work commencement. Where possible, redesign or slightly realign infrastructure to avoid mature trees, riparian vegetation, and known habitat of protected or rare species. Conduct a walk-through ecological survey to identify any protected species (as per the Forestry Act No. 12 of 2001 or Nature Conservation Ordinance No. 4 of 1975). Obtain tree harvesting or relocation permits if required.	Vegetation clearing minimal Marking the borders of works site boundaries	Contractor/ DWN	Site inspection prior to commencement of activities.

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
B. Protection of the Environment				
	Ensure that no chemicals/pesticides are used, burning of vegetation is restricted etc. Do not clear vegetation more than two months in advance of operations	No use of fires or chemicals on site Marking the borders of works site boundaries Usage of warning signs	Contractor/ DWN	Site inspection prior to commencement of activities. Site inspection during site clearance
	Implement progressive clearing and immediate backfilling where applicable.	Visual inspection	Contractor/ DWN	Site inspection
	Avoid clearing mature trees and endangered species. Educate workers about ecological sensitivity, protected species, and the importance of avoiding unnecessary disturbance of vegetation	No mature trees cleared	Contractor/ DWN	Site inspection prior to commencement of activities.
B18. Biodiversity	Avoid to the extent possible areas of ecological value.	Areas of ecological value avoided	Contractor/ DWN	Site assessment prior to site selection.
	Avoid natural habitat disturbance outside construction area. Rescue trapped fauna and relocate to a safe area. Prohibit hunting by workers.	No habitats disturbed outside construction area	Contractor/ DWN	Regular site inspection
B19. Erosion control measures	If construction takes place on inclined surfaces/slopes, ensure preventive erosion control measures are applied (e.g. plan to retain trees and other vegetation, use of natural contours for roads and drainage networks, excavated drainage channels).	Preventive temporary and permanent erosion control measures in place Landscape and bio-restoration plan in place	Contractor/ DWN	Random site inspection to check if measures where applied

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
B. Protection of the Environment				
	Ensure that topsoil is stripped and stored properly. Topsoil should not be mixed with subsoil. Topsoil stockpile to be protected from erosion.	Topsoil salvaged and stored. Stockpile height limited	Contractor/ DWN	Monitor if topsoil is properly stripped and stored
	Conduct phased rehabilitation on areas that have been constructed.	Check if areas are rehabilitated after completed construction activitie.	Contractor/ DWN	Regular site inspection
	Schedule construction to avoid rainy season.	Mayor earthworks need to be concluded during the dry season	Contractor	Regular site inspection
	Backfill trenches within the quickest possible time.	Avoid long periods storage of excavated material	Contractor/ DWN	Regular site inspection
	After construction, topsoil to be used for restoration of the area.	Topsoil re-used for restoration	Contractor/ DWN	Site inspection at completion
B20. Site rehabilitation	Ensure that rehabilitated areas don't pose health and safety risks (such as holes, ponds).	Reinstatement completed	Contractor/ DWN	Site inspection at completion Inspection after heavy rainfalls
	Reinstatement of construction working area to the best possible after construction activities are completed.	Reinstatement completed	Contractor/ DWN	Site inspection at completion Inspection after heavy rainfalls
	Rehabilitate borrow areas, backfill material stockpile sites and access roads, where applicable.	Rehabilitation completed	Contractor/ DWN	Site inspection at completion
	Photo documentation (before and after) as part of verification.	Rehabilitation / Decommissioning	Contractor/ DWN	Monitoring process

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
C. Health and Safety				
C22. Health and Safety Plan	Develop a Health and Safety Plan to provide for a safe and healthy work environment, taking into account the ESHS impacts and risks level of the works. Fence off hazardous areas, use traffic signage, provide community awareness and emergency response plan. Align with IFC PS4, KfW community safety protocols.	H&S Plan in place Hazardous identification	Contractor/ DWN Contractor	Review of H&S Plan Site inspection and reporting Review of grievance records
C24. Accident reporting	Ensure all H&S related incidents (e.g. observations, accidents) on site are recorded and followed up properly.	Incident recording process in place	Contractor/ DWN	Check incident/accident records
C28. Personal protective equipment	Ensure the provision of Personal Protective Equipment (PPE) for workers • **Eye and Face Protection** Safety glasses or face shields are worn any time work operations can cause foreign objects to get in the eye. For example, during welding, cutting, grinding, nailing (or when working with concrete and/or harmful chemicals or when exposed to flying particles). Wear when exposed to any electrical hazards, including working on energized electrical systems. Eye and face protectors – select based on anticipated hazards. • **Foot Protection** Construction workers should wear work shoes or boots with slip-resistant and puncture-resistant soles. Safety-toed footwear is worn to prevent crushed toes	PPE used by everyone on-site Training performed and recorded	Contractor/Site Manager	Random site inspection Review training records

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
C. Health and Safety				
	when working around heavy equipment or falling objects. • **Hand Protection** Gloves should fit snugly. Workers should wear the right gloves for the job (examples: heavy-duty rubber gloves for concrete work; welding gloves for welding; insulated gloves and sleeves when exposed to electrical hazards). • **Head Protection** Wear hard hats where there is a potential for objects falling from above, bumps to the head from fixed objects, or of accidental head contact with electrical hazards. Hard hats – routinely inspect them for dents, cracks or deterioration; replace after a heavy blow or electrical shock; maintain in good condition. • **Hearing Protection** Use earplugs/earmuffs in high noise work areas where chainsaws or heavy equipment are used; clean or replace earplugs regularly.			
C31. Emergency scenarios prevention	Ensure immediate cleaning of any spills and remediation of contaminated areas after construction.	Workers trained. Emergency Response Team (ERT) is in place	Contractor/ DWN	Random site inspection after spill events One-time inspection after construction Review of training records Review of ERT

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
C. Health and Safety				
	Provide necessary prevention equipment and teams on site in line with applicable regulations to respond to emergency scenarios e.g. fire, explosion, floods, natural hazards etc.	Prevention equipment and team is in place Training performed and recorded	Contractor/ DWN	Regular site inspection Review list of equipment Review of ERT Review of training records
	Maintain high standard in housekeeping on site. Construction materials and equipment should be stored properly.	Visual verification of good housekeeping on-site	Contractor/ DWN	Random site inspection
C33. First-aid	Ensure minimum first aid provisions on site (suitably stocked first-aid kits; a person, respectively an adequate number of first-aid helpers and ensure that staff and workers are informed about first-aid arrangements)	Suitable first aid kits on site Ensure the presence of first aid helpers in all shifts First aid certificates	Contractor/ DWN	Regular monitoring of first aid kits Review of first aider certificates Review of number of first aiders required by local legislation
C37. Access to health care	In case more than 35 workers are present on site, ensure that a hospital, medical clinic or a health centre can be reached within a period of 45 minutes.	Medical centres in the proximity of the site.	Contractor/ DWN	Medical centres in the proximity of the site identified once prior the commencement of works
C40. Hygiene, accommodation and food	Ensure provision of Health and Safety (H&S) and hygienic and sanitary facilities at the site, including shaded welfare areas, bathrooms, changing rooms and potable water. Ensure toilets and changing rooms are separated between male and female employees.	Appropriate H&S and sanitary facilities provided at site	Contractor/ DWN	Campsite inspection prior to accommodation of the workers. Regular inspection Review of grievance records

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
C. Health and Safety				
	Ensure the provision of adequate space, supply of water, adequate sewage and garbage disposal system, appropriate protection against heat, cold, damp, fire and disease-carrying animals, adequate sanitary and washing facilities, adequate lighting, and basic medical services, in accordance with all applicable health and safety regulations and norms.	Appropriate conditions for workers on site	Contractor/ DWN	Campsite inspection prior to accommodation of the workers. Regular inspection Review of grievance records
	Report any occurrence of any communicable diseases amongst the workforce (STD, HIV/AIDS, TB, malaria and Hepatitis B and C). Sensitise workers.	Communicable Diseases Register Training performed and recorded	Contractor/ DWN	Review of diseases register and disease prevention programme if available. Review of training records

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
D. Labour and relations with local communities				
D42. Labour conditions	Ensure minimum legal labour standards as per ILO regulations (child/forced labour, sexual assault, no discrimination, equal opportunities, working hours, minimum wages) are met.	Grievance Mechanism Records, Training performed and recorded	Contractor/ DWN	Review of Inspection reports (also from labour authorities), Review of grievance records Review of training records
	Ensure that all direct and indirect workers have access to and are aware about the Grievance Mechanism were they can raise workplace relevant complaints anonymously.	Grievance Mechanism in place and grievances recorded Training performed and recorded	Contractor/ DWN	Review of grievance register Review of training records

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
D. Labour and relations with local communities				
	Ensure all workers have the same rights and are treated equally.	Non-discrimination policy in place	Contractor/ DWN	Random site inspection Review of grievance register
D43. Local recruitment	Ensure local communities are preferred for the supply of goods and services to the Project and Project personnel, where appropriate. Provide on-site training and issue certificates of competence. Promote skilled workers into team leader roles.	Local Procurement and Employment Records	Contractor/ DWN	Review procurement and employment rules and records Review of grievance register
D44. Transport	Organise carpools/buses for worker transportation where needed. Ensure safe transportation is available for workers.	Carpools/ buses used	Contractor/ DWN	Review of grievance register
D47. Community interaction Section 12.4 of the EA Report	Engage/ communicate/inform communities. Ensure consultations with the local authorities and communities regarding the construction. Obtain local knowledge regarding chance finds and land acquisition matters.	Minutes of Meetings Grievance Mechanism – Section 12.7 of the Environmental Report	Contractor/ DWN	Review of grievance register Minutes of consultation meetings

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
D. Labour and relations with local communities				
	Initiate an efficient Grievance Mechanism to allow potentially affected individuals to raise their concerns. Consult with affected business vendors via the appointed CLO. Provide temporary relocation of vendors where required and re-establish access post-construction. Prioritize local workforce hiring. Advertise positions publicly and use the existing social structures in collaboration with the local political structures / offices. Offer short-term contracts with fair wages in line with the Labour Law.	Grievance Mechanism in place. Grievances recorded Employment register	Contractor/ DWN	Review of grievance register Track consultations with vendors and record temporary relocations and re-establishment efforts. Maintain employment register disaggregated by origin and contract type.

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
D. Labour and relations with local communities				
	Engage with the local community and potential affected households to understand their needs and identify the risk of damage to their livelihood basis through the Project (e.g. take of pasture land, lack of access to water). This is done via the CLO. Erect fencing around the construction camp. Provide safe walkways for the local communities to use. Limit public access to the construction site. Collaborate with local health officials and NGOs to deliver health education campaigns on hygiene, STIs, substance abuse, and safety for both workers and community members. Locate worker accommodation away from residential zones and enforce a Code of Conduct to reduce negative social interactions and the potential for gender-based violence (GBV) or exploitation. Enforce the grievance mechanism for community members to report concerns related to health, safety, or contractor behavior.	Minutes of Meetings Grievance Mechanism records Management Plan for Land Acquisition and Compensation if needed	Contractor/ DWN	Review of grievance register and meeting minutes
D48. Damage to people and property	Ensure all contractors implement Codes of Conduct concerning employment and workforce behaviour (including but not limited to safety rules, zero tolerance for substance abuse, environmental sensitivity of the area, gender equality and sexual harassment, respect for the beliefs and customs of the populations and community relations in general).	Code of Conduct attached Grievance Mechanism records	Contractor/ DWN	Worker interviews, Review of grievance register

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
D. Labour and relations with local communities				
	Ensure that site areas are provided with appropriate security, fencing, signage and lighting. Use hazard notices/signs/barriers to protect children and other vulnerable people from harm and prevent access to non-workers.	H&S planning of construction site done, items installed	Contractor/ DWN	Inspection prior to the activities. Regular site inspection Review of grievance register
D49.Land acquisition and land take	Engage with the local community to understand the land ownership and land use. Avoid to the extent possible land take of both formal and informal land owners/land users. If land take is inevitable, no forced eviction should take place. Owners should be compensated prior to access to land.	Grievance Mechanism Management Plan for Land Acquisition and Compensation if needed	Contractor/ DWN	Once during site selection Review of grievance log Follow up of land acquisition/compensation process
D50. Traffic management	Ensure safe driving by Project personnel (e.g. through training/induction).	Driver Training Records as part of Induction training	Contractor/ DWN	Review of training records Review of grievance register
	Develop a traffic management plan (TMP) and it need to be approved by the R.E. Install appropriate road signs where required according to the traffic management plan. Avoid construction material deliveries during peak hours.	TMP shall be drafted and approved by RE.	Contractor	Submit for approval by RE.
	Establish designated haul routes; avoid school and pedestrian zones.	Driver Training Records as part of Induction training	Contractor/ DWN	Review of training records Review of grievance register

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
D. Labour and relations with local communities				
	Assign flag people at road crossings used by construction vehicles.	Visual inspection	Contractor/ DWN	Review of training records Review of grievance register Visual inspection
	Target signage and outreach activities to improve public awareness of traffic changes and potential hazards for high-risk sections of public roads, including near the site and laydown areas.	Warning signs Minutes of Meetings	Contractor/ DWN	Inspection if traffic routes, Review of grievance register
D51. Fossils/ Archaeological Chance Finds	Establish specific procedures to manage the protection of archaeological and historical sites, chance finds and fossils. Halt work if artifacts are found, engage National Heritage Council. Comply with Heritage Act and IFC PS8. Any heritage find must be properly documented (GPS location, photos, description) and reported to the National Heritage Council for evaluation and decision-making. Do not remove, alter, or disturb any cultural or archaeological material without a permit issued under the National Heritage Act (No. 27 of 2004).	Chance Finds Procedure Notification records to relevant authority Training records, Records about chance finds	Contractor, Environmental Control Officer (ECO), National Heritage Council, Traditional Authorities.	Site inspection Review records of chance finds

This List was supplied by DWN and forms part of the ESMP mitigation measures for this project:

Topic	DO	DON'T
Land Use	• Prefer already disturbed areas for workers' accommodation, storage, workshop and the worksite. • Clearly mark "No-go" areas (cultivated lands or fruit trees, wetlands, grave sites or any sensitive environment or social site/area). • Avoid proximity to schools, health posts and households with vulnerable families. • Clean up the worksite and rehabilitate the site to its original condition. • Rehabilitate all temporary access tracks, haul roads and any other disturbed areas outside of the approved working areas to their original condition.	• Do not enter any worksites and areas without permissions and approvals. • Do not damage any households and associated structures, cultivated lands, fruit trees or any other potential source of income. • Do not undertake any activity and park your vehicles outside of the working area borders.
Noise	• Limit working hours for noisy activities working hours close to schools, hospitals, residents, religious buildings, etc. • Turn off vehicle engines if not required. • Keep the noise level to acceptable limits.	• Do not undertake any noisy activity during night time.
Dust and Air	• Minimize traffic wherever possible and drive slowly. • Spray the unpaved roads with water if you're working close to schools, hospitals, residential areas, etc. • Revegetate the disturbed areas as soon as activity is completed. • Drive slowly not to generate dust.	• Do not store cement, sand, excavated material without cover sheets or shelters. • Do not clear the vegetation cover if it's not required.
Water	• Refuel the vehicles at least 30 m away water courses. • Fence the construction site adjacent to the sensitive areas such as natural water courses, ponds, drains. • Divert the runoff / water the construction sites or disturbed areas, using ditches.	• Do not use any natural water resources to supply water (e.g. springs, streams, lakes without approval of relevant authorities, local leaders. • Do not discharge of hazardous substances, chemicals, construction material and wastes d into water courses, ponds, drainage systems. • Do not block the water flow.

Topic	DO	DON'T
Waste	• Keep the working site clean and tidy. • Store hazardous waste using secondary containment and restrict access to hazardous waste storage area to prevent harm to construction staff, environment and public. • Perform on site sorting to separate liquid, organic, demolition, hazardous, recyclables waste streams and identity the disposal pathway for each of them. • Use waste containers without any damages and leakages. • Reuse the excavated soil as much as possible for backfilling, landscaping and for other project areas where excavation material is required. • Collaborate with local authorities to transport and dispose waste in accordance with legal requirements.	• Do not burn any type of waste. • Do not dump waste at any unpermitted area and especially near watercourses. • Do not leave any sharp or dangerous objects (knives, box cutters, scissors, broken glass, etc.) that may attract children's attention living close to the construction site.
Employment and Labour Rights	• Implement a fair and transparent employment process. • Provide workers with clear and understandable information regarding rights via contract documents in local language.	• Do not discriminate any workers or job applicants on the basis of their gender, marital status, nationality, ethnicity, age, religion or sexual orientation. • Do not recruit children (under 18 years old) or use forced labour.
Code of Conduct	• Establish a Code of Conduct for worker-community interaction and on-site behavior. Oblige workers to adhere to code of conduct.	
Grievances	• Establish and maintain grievance mechanism accessible for workers.	• Do not ignore community complaints

Topic	DO	DON'T
Community Safety	• Establish and maintain grievance mechanism for local communities adjacent to construction sites. • Secure worksites (temporary bridges, traffic controls, barricades, signs and warning lights). • Demarcate open trenches with high visible temporary fencing, undertake monitoring after rainfall, and prevent flooding of trenches. • Inform relevant authorities immediately in case of damages on utilities such as underground and aboveground electricity lines, water lines, gas lines, oil pipelines, etc. • Establish appropriate site boundary and access controls near settlements to prevent unauthorized entry to construction or activity sites especially by children (e.g. fencing of construction section in the vicinity of settlements or communities).	• Do not leave any holes and openings without secure fencing provided with fixed, clearly marked covers. • Do not exceed the speed limits.
Traffic Management	• Implement speed limits for all Project vehicles. • Equip vehicles with reverse signals. Ensure that truck drivers are accompanied by a flagman or watchman while reversing, unloading and loading. • Train all drivers on safety provisions. • Avoid routes with blind curves, blind intersections and very narrow roads alongside steep slopes. • Avoid routes that are frequently used by locals. • Use local traffic signage and collaborate with the responsible local authorities and communities. • Keep access roads in good condition and free from deposits, waste, construction material. • Use flagmen where appropriate and install clear and visible signage. • Avoid vehicle traffic during hours that children are travelling to and from school.	• Do not drive without a valid driver's license. • Do not use cell phones while driving.

Topic	DO	DON'T
Occupational Health and Safety	• Provide health and safety training to all Project employees and familiarize workers with the risks related with their activities. • Conduct risk assessment and define mitigation measures for each activity. • Record and report any workplace hazards or any incidents or injuries. • Provide the right PPE and make sure that all employees use them. • Keep PPEs in good condition and change them in case they are damaged. • Prohibit usage of alcohol or illegal drugs. • Use the right tool for the activity. • Use undamaged ladders if you need to climb up. • Implement good housekeeping to prevent trips, slips and falls. • Conduct daily tool-box talks / conversations on health and safety issues before starting works. • Conduct medical examination for all personnel before the activities start. • Provide sufficient drinking water for workforce. • Provide and maintain toilet facilities for workforce separately for female and male workers. • Provide one trained first aiders per 25 employees and adequate amount of first aid kits on site.	• Do not try to repair any broken equipment and machinery if you are not authorized. • Do not use of metal ladders close to overhead power lines? • Do not work without PPE. • Do not work alone or isolated.
Housekeeping	• Keep working areas clean and tidy. • Secure loose materials that have the potential to fall. • Keep aisles, stairways, passageways, ladders, etc. free of obstructions, materials, cables, chords, hoses, etc. • Keep materials away from the edge of excavations, trenches, roofs, etc. • Cover and secure open trenches, holes and other openings Avoid pools of stagnant water in working areas. • Undertake daily clean-up of activity area.	

Topic	DO	DON'T
Hazardous Material Management	• Store fuels, oils, chemicals and other hazardous materials on a suitably sized impervious and bunded base. • Label the containers clearly with content, handling, storage, expiration, and health and safety information. • Use drip trays during fueling and maintenance (e.g. changing oil) of equipment. • Install proper warning signs at hazardous material storage yards, lock gates and restrict access to authorized personnel. • Store hazardous waste using secondary containment and restrict access to hazardous waste storage area to prevent harm to construction staff, environment and public.	• Do not smoke close to hazardous materials. • Do not dispose of Hazardous Material inappropriately
Fire Prevention and Control	• Take all reasonable and precautionary steps to ensure that fires are not started as a consequence of Project activities on site. • Provide basic fire-fighting equipment available on site (including but not limited to, rubber beaters when working in grass/bush areas, at least one fire extinguisher of the appropriate type when welding or other 'hot' activities are undertaken). • Store flammable materials under conditions that will limit the potential for ignition and the spread of fires. • Train all employees on the fire risks and how to deal with any fires in case one occurs.	• Do not light fire for any reason, incl. waste burning. • Do not throw your cigarette butts on the ground.

Code of Conduct: Worker–Community Interactions on Site

This Code of Conduct outlines the expected behaviour of all personnel involved in the Rundu infrastructure project. It applies to employees, subcontractors, suppliers, and all other individuals working on or visiting the construction site. The goal is to promote respectful, lawful, and culturally appropriate interactions with local communities and to uphold the principles of good environmental and social governance in line with Namibian law, IFC Performance Standards, and KfW's sustainability requirements.

Respect for Community Members

All personnel are expected to treat community members with courtesy, dignity, and respect. This includes recognising cultural and social norms, showing sensitivity to local customs, and refraining from any behaviour that could be seen as disrespectful or intrusive. Discrimination on the basis of gender, ethnicity, age, religion, or disability is strictly prohibited. Workers must ensure that their conduct promotes peaceful coexistence and positive relations with surrounding communities.

Prohibited Conduct

The following behaviours are explicitly prohibited: harassment (verbal or physical), sexual advances or exploitation, gender-based violence, substance abuse on or near the site, fighting or intimidation, theft, vandalism, and participation in illegal activities such as hunting or harvesting protected natural resources. Workers are not permitted to engage in intimate relationships with community members where a power imbalance exists or where it may compromise the integrity of the project. Any form of violence or disrespect toward community residents is grounds for removal from the project.

Respect for Property and Boundaries

Workers must respect private and communal property and may not enter homes, farms, institutions (e.g. schools or clinics), or community gathering places without prior permission. Construction activities must remain within the approved project boundaries. Materials and equipment must not block or damage roads, footpaths, or access points used by residents. Community facilities must not be used for storing materials, dumping waste, or for any work-related activities without written consent from local authorities.

Cultural and Environmental Sensitivity

All personnel are required to respect sites of cultural, historical, or environmental significance. This includes avoiding disturbance of sacred grounds, archaeological features, or protected flora and fauna. The use of fire, herbicides, or other chemicals in community areas is strictly prohibited. Workers must not interfere with traditional land uses or community livelihood activities (e.g., grazing, water collection) without prior consultation and agreement.

Worker Training and Awareness

All workers will undergo mandatory induction training on appropriate behaviour, community relations, cultural awareness, and the content of this Code of Conduct. Regular Toolbox Talks will reinforce these principles. Attendance records and signed acknowledgments will be maintained by the Contractor and made available for audit. Workers must participate in refresher training sessions as required and demonstrate understanding of the behavioural expectations.

Community Grievance Mechanism

The project maintains a formal grievance mechanism that allows community members to raise concerns in a confidential and respectful manner. Workers must not interfere with or attempt to discourage the use of this mechanism. Any reports made by community members must be treated seriously, and retaliation against complainants is strictly forbidden. The grievance mechanism will be promoted in the community, and responses to complaints must be documented and resolved transparently.

Disciplinary Measures

Failure to comply with this Code of Conduct will lead to disciplinary action. Depending on the severity of the offence, measures may include verbal warnings, written reprimands, suspension, dismissal from employment or contract termination, and referral to relevant authorities where criminal conduct is suspected. The contractor is responsible for enforcing this Code and must report any violations immediately to the project management team and Environmental and Social Control Officer (ESCO).

Acknowledgement and Enforcement

All personnel must sign an acknowledgment confirming they have read, understood, and agreed to comply with this Code. A copy of the signed form will be retained in the site records. Supervisors, the Community Liaison Officer (CLO), and the ESCO will monitor compliance, and periodic reviews will be conducted to assess the effectiveness of community engagement protocols.