



DRAFT ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN

FOR INFRASTRUCTURE CONSTRUCTION ACTIVITIES AT OMAKANGO,
ONDANGWA, OSHANA REGION

February 2026

Prepared for

Development Workshop Namibia (DWN)

Prepared by

Urban Dynamics Africa (UDA)

UDA Project No: 1310

Revision No: 01:



DOCUMENT INFORMATION

Title	ESMP for Infrastructure Construction Activities at Omakango Proper, Ondangwa, within the Oshana Region
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Keywords	Development Workshop, Urban Development, Management Plan
Status	Draft
Report No.	1
Company	Urban Dynamics Africa (Pty) Ltd.
MEFT App Ref	005750
UDA Project No.	Ondangwa 1310
Report Date	February 2026

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ACRONYMS AND ABBREVIATIONS

ACRONYM / ABBREVIATION	DESCRIPTION
BID	Background Information Document
BMZ	Bundesministerium für wirtschaftliche Zusammenarbeit und Entwicklung
DEA	Department Of Environmental Affairs
DWN	Development Workshop Of Namibia
EA	Environmental Assessment
EC	Environmental Commissioner
ECC	Environmental Clearance Certificate
EHS	Environmental, Health And Safety
EIA	Environmental Impact Assessment
EMA	Environmental Management Act
EMP	Environmental Management Plan
ER	Employers Representative
ESF	Environmental And Social Framework
ESHS	Environmental, Social, And Health And Safety
ESIA	Environmental And Social Impact Assessment
ESS	Environmental And Social Standards
FRMP	Flood Risk Management Plan
ha	Hectares
I&APs	Interested And Affected Parties
ILO	International Labour Organization
KfW	Kreditanstalt Für Wiederaufbau
Km	Kilometre
m	Meter
m²	Square Meters
MEFT	Ministry Of Environment, Forestry, And Tourism
mm	Millimetre
N&S	Health, and Safety
NBD	The Namibia Biodiversity Database
NCE	Namibian Chamber Of Environment
NHC	Namibian Health Care
NoRed	Northern Regional Electricity Distributor
PEA	Project Environmental Advisor
PPE	Personal Protective Equipment
SME	Small-And-Medium-Sized Enterprise
TB	Tuberculosis
TRRP	Tree Removal and Replacement Plan
UDA	Urban Dynamics Africa
URPB	Urban And Regional Planning Board
WMP	Waste Management Plan
E&S	Environmental and Social

1 INTRODUCTION

Development Workshop Namibia (DWN), in partnership with the Ondangwa Town Council, is implementing the construction of bulk infrastructure and internal roads for the establishment of the Omakango Proper township, located within Ondangwa in the Oshana Region of Namibia (the "Project"). The Project forms part of the planned urban expansion of Ondangwa and aims to provide serviced erven supported by appropriate infrastructure and services.

The Project is subject to the Environmental Management Act, 2007 (Act No. 7 of 2007) and the Environmental Impact Assessment Regulations, 2012, and requires an Environmental Clearance Certificate (ECC) prior to commencement of construction activities.

An Environmental Scoping Assessment (ESA) was undertaken for the Project, and the findings of the ESA informed the Project design, layout, and identification of environmental and social risks. This Environmental and Social Management Plan (ESMP) has been prepared to implement the mitigation and management measures identified through the ESA and to ensure that construction activities are carried out in compliance with the ECC, applicable legislation, and funder requirements.

1.1 REGULATORY CONTEXT AND PURPOSE OF THIS ESMP

The purpose of this Environmental and Social Management Plan (ESMP) is to provide a practical framework for the management of environmental, social, health, and safety risks associated with the construction phase of the Omakango Proper infrastructure development.

This ESMP translates the commitments and mitigation measures identified in the Environmental Scoping Assessment into clear, site-specific management, monitoring, and reporting requirements to be implemented during construction. The ESMP does not reassess Project impacts, but rather operationalises approved measures to ensure compliance with the Environmental Clearance Certificate and relevant environmental and social standards.

The ESMP has been prepared in accordance with:

- Namibia's Environmental Management Act, 2007 and the Environmental Impact Assessment Regulations, 2012;
- Applicable sectoral legislation and local authority requirements;
- The Sustainability Guideline of Kreditanstalt für Wiederaufbau (KfW) (2021); and
- Relevant World Bank Environmental and Social Standards (ESS), as applicable to the Project.

1.2 ROLES AND GOVERNANCE FRAMEWORK

Development Workshop Namibia (DWN), as the Project Proponent and Employer, retains overall responsibility and accountability for ensuring that the Project is implemented in compliance with the Environmental Clearance Certificate, applicable legislation, and funder requirements.

Knight Piésold Consulting (Pty) Ltd (KP) has been appointed as the Engineer for the Project and is responsible for the approval of designs, drawings, and construction-related submissions, as well as contractual oversight of construction activities.

The appointed Construction Contractor will be responsible for the day-to-day implementation of the ESMP on site and for ensuring that all construction activities comply with the requirements of the ESMP, the ECC, and approved designs.

1.3 SCOPE OF THE ESMP

This ESMP applies specifically to the **construction phase** of the Omakango Proper township development and covers all construction-related activities within the Project area and associated areas of influence, including road reserves, service corridors, and temporary construction areas.

Operational phase environmental and social management will be the responsibility of the Ondangwa Town Council and relevant service authorities and is therefore not addressed in detail in this document.

1.4 STAKEHOLDER ENGAGEMENT

Stakeholder engagement for the Project was undertaken as part of the Environmental Scoping Assessment process in accordance with the Environmental Management Act, 2007 and the Environmental Impact Assessment Regulations, 2012.

During the construction phase, stakeholder engagement will focus on:

- Providing information on construction activities and schedules;
- Managing concerns and complaints through the established Grievance Mechanism; and
- Maintaining communication with affected communities, the local authority, and relevant stakeholders.

The approach to stakeholder engagement and grievance management during construction is described in Section 5 of this ESMP.

1.5 STATUS OF THIS ESMP

This ESMP is a live document and may be updated or amended, where necessary, to reflect changes in construction methods, sequencing, or Project design, provided that such changes remain within the scope of the approved Environmental Clearance Certificate and are approved by Development Workshop Namibia.

2 PROJECT DESCRIPTION

This section provides an overview of the Project to establish the context within which the ESMP will be implemented during the construction phase. It outlines the Project location, land ownership, surrounding land uses, biophysical setting, proposed development, construction activities, and key stakeholders.

2.1 LOCALITY OF THE PROJECT

The Project is located within Ondangwa, in the Oshana Region of Namibia, on Portion 69 of the Remainder of Farm Ondangwa Town and Townlands No. 882, Registration Division A. The site forms part of the planned urban expansion area of Ondangwa and is located north of the C46 Road. The location of the Project site is illustrated in Figure 1.

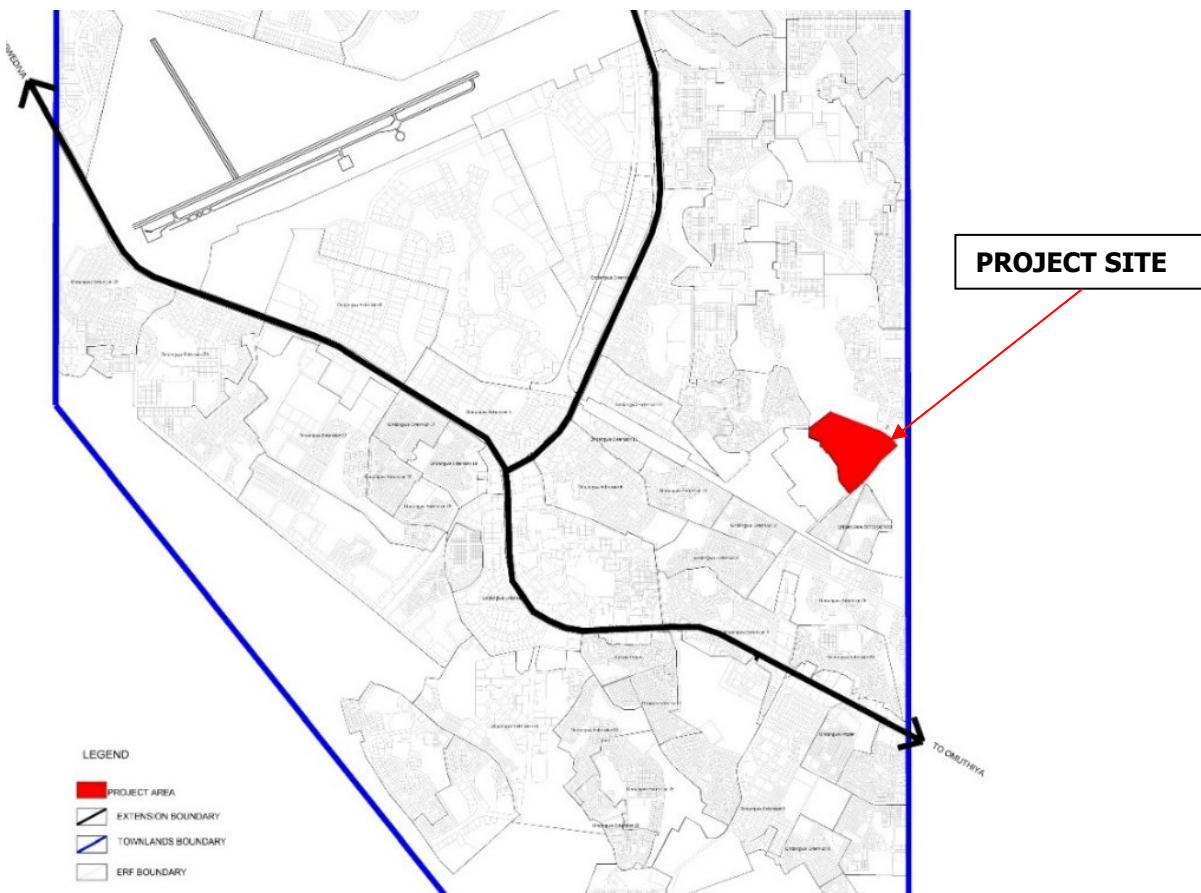


Figure 1: Location of the Project Site

2.2 OWNERSHIP, SIZE, SHAPE, AND CURRENT LAND USE

The Project site is owned by the Ondangwa Town Council and is currently zoned as Undetermined. The site has an approximate extent of 24.8 hectares and is irregular in shape. Table 1 shows the portions sizes.

Table 1: Portion Sizes

PORTION 69		
PORTION	Total Area (Sqm)	Zoning
Portion 69	24,8	Undetermined

The area has previously been used for crop farming and informal residential activities and is therefore considered a brownfield development. Existing features include cleared fields, informal structures, and access tracks. A Nored power line runs along an existing spoor road providing access to the site and to nearby settlements.

2.3 SURROUNDING ACTIVITIES

Surrounding land uses include informal residential settlements and homesteads to the north and east, cleared agricultural land, and existing residential areas associated with Omakango to the south. No formally protected areas occur within or immediately adjacent to the Project site.

Given the proximity of residential and informal settlement areas, construction activities will require careful management to minimise dust, noise, traffic-related risks, and potential community health and safety impacts.

2.4 ACCESS AND UTILITY SERVICES

The Project site is accessed via existing track spoors connected to Ondangwa Extension 39 and the surrounding road network.

- **Water Supply:** Bulk water is supplied to Ondangwa by NamWater, with reticulation managed by the Ondangwa Town Council.
- **Electricity Supply:** Electricity is supplied by the Northern Regional Electricity Distributor (Nored).
- **Sanitation:** Surrounding areas predominantly rely on septic tanks and pit latrines due to the absence of a formal sewer network.
- **Communication:** The area is serviced by mobile communication networks, radio, and print media.

2.5 BIOPHYSICAL ENVIRONMENT AND LOW-LYING AREAS

The Project site is located within a relatively flat landscape typical of the oshana system in the Oshana Region. Parts of the site include low-lying areas associated with natural surface drainage patterns and may be subject to temporary inundation during periods of intense or prolonged rainfall.

Soils in the area are generally sandy and susceptible to erosion when disturbed. Vegetation is sparse to moderately disturbed due to historical agricultural activities and wood harvesting, with scattered trees present, some of which may be protected species in terms of the Forestry Act.

The site is not located within a formally protected area; however, natural drainage paths and low-lying areas represent key environmental sensitivities that must be managed during construction.

2.6 PROJECT OVERVIEW AND PROPOSED DEVELOPMENT

The Project involves the establishment of the Omakango Proper township through the rezoning of land from Undetermined to residential, business, institutional, and public open space land uses.

The development will provide approximately 284 serviced erven, supported by an internal road network and bulk infrastructure services. The Project aims to support orderly urban expansion, improve access to formal services, and contribute to improved living conditions within Ondangwa.

Filling of selected low-lying areas forms part of the approved project design as assessed in the Environmental Scoping Assessment and associated engineering inputs, and will be implemented in accordance with the mitigation measures set out in this ESMP.

2.6.1 Township Layout and Infrastructure Alignment

The proposed township layout for Omakango Proper has been prepared in accordance with the approved structure plan and the planning requirements of the Ondangwa Town Council and the Ministry of Urban and Rural Development (MURD). The layout forms the primary planning framework for the alignment and installation of all bulk and internal infrastructure associated with the Project.

Bulk infrastructure services, including water supply pipelines, electricity reticulation, stormwater infrastructure, and associated service corridors, will largely be aligned within approved road reserves as defined in the township layout. The layout therefore provides the basis for determining the routing, positioning, and sequencing of infrastructure installation during the construction phase.

The layout has been designed to:

- Accommodate approximately 284 serviced erven;

- The approved draft layout of Omakango Proper is presented in Figure 2 and shall guide all construction activities related to bulk infrastructure and road development.

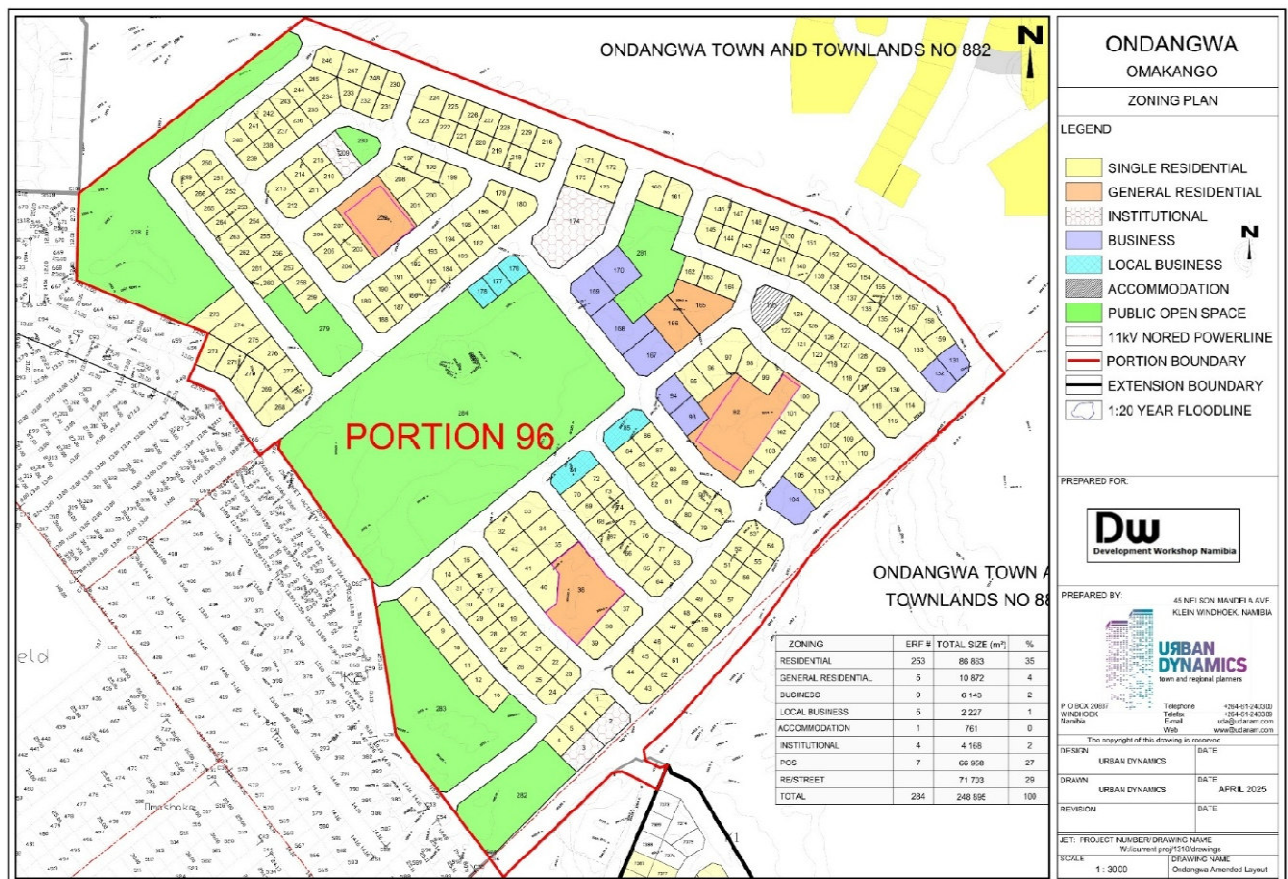


Figure 2: Draft Layout of Omakango Proper

2.6.2 Final Infrastructure Layouts and ESMP Updates

Detailed engineering designs and final surveyed infrastructure layouts, including the alignment of roads and bulk services, will be prepared and approved by the Implementation Consultant, Knight Piésold Consulting (Pty) Ltd, on behalf of DWN.

The final approved infrastructure layouts shall be issued to the appointed Contractor prior to the commencement of construction activities. The Contractor shall implement all works strictly in accordance with the issued drawings and shall not deviate from approved alignments without prior written approval from Development Workshop Namibia and the Implementation Consultant.

Where final infrastructure layouts or design refinements result in material changes to construction methods, sequencing, or environmental and social risks, this ESMP shall be updated or amended accordingly prior to implementation.

2.7 CONSTRUCTION ACTIVITIES

Construction activities will be implemented in phases and will focus on the provision of bulk infrastructure and internal roads to service the township.

2.7.1 Site Preparation and Clearance

Site preparation activities will include:

- Clearing of vegetation and debris within approved development boundaries;
- Excavation and earthworks to achieve required platform levels, particularly in low-lying areas;
- Stockpiling of excavated material for reuse where feasible; and
- Implementation of erosion control and dust suppression measures, especially near residential areas.

2.7.2 Road and Infrastructure Construction

Road construction will include:

- Distributor roads (20 m reserves);
- Collector roads (15 m reserves); and
- Access roads (13 m reserves).

Bulk infrastructure construction will include:

- Installation of bulk and internal water supply pipelines;
- Construction of a 50 m³ ground steel reservoir and a 250 m³ elevated water tank;
- Installation of bulk and internal electricity infrastructure, including underground electricity lines and substations; and
- Construction of berms and controlled filling of selected low-lying areas to improve drainage and manage flood risk.

2.8 DEVELOPMENT STAKEHOLDERS

Figure 3 and Table 2 summarise the main stakeholders involved in the Omakango Township project in Ondangwa, including their roles, engagement activities, and an indicative timeline for involvement.

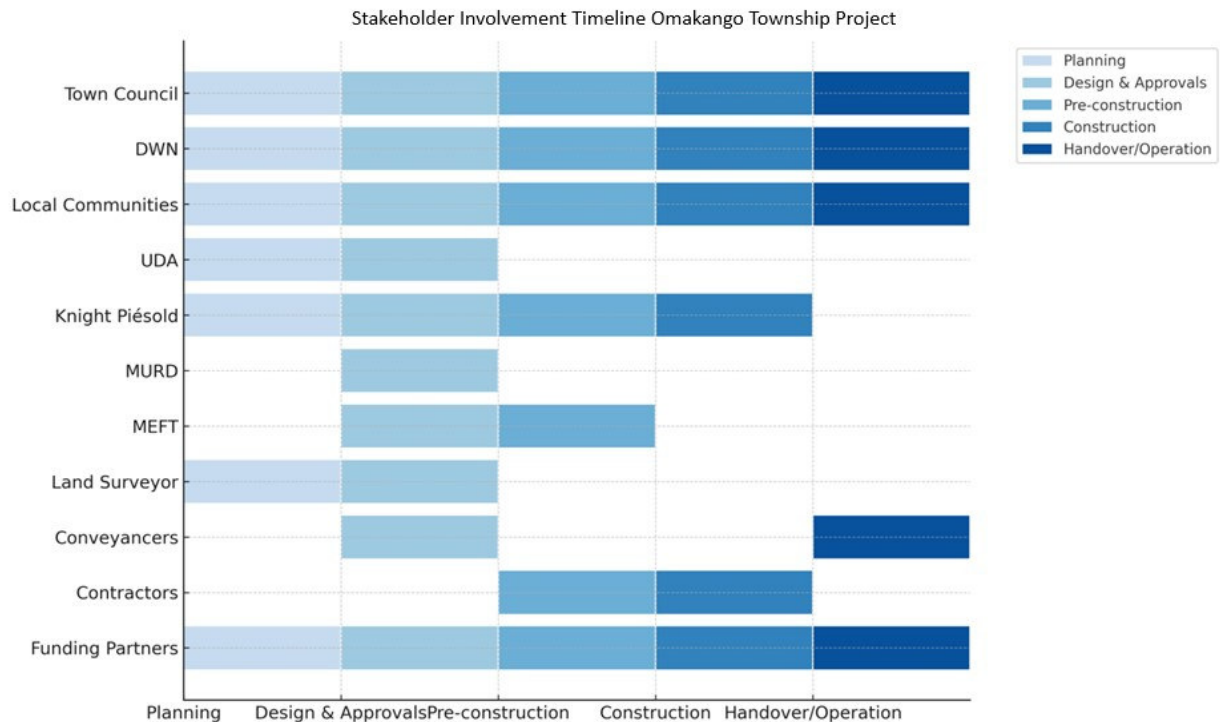


Figure 3: Main Stakeholders' Involvement Timeline

Table 2: Development Stakeholders

STAKEHOLDER	ROLE / RESPONSIBILITY	ENGAGEMENT OR KEY ACTIONS	INDICATIVE TIMELINE
ONDANGWA TOWN COUNCIL	Overall authority for township establishment, planning coordination, and approvals.	Planning and arranging development agreement with DWN; Approvals by CEO and Council resolutions; Technical arrangements with service providers and Engineering Department; Review and consent before MURD approval; Ongoing oversight and community liaison.	Planning to project handover.

STAKEHOLDER	ROLE / RESPONSIBILITY	ENGAGEMENT OR KEY ACTIONS	INDICATIVE TIMELINE
DEVELOPMENT WORKSHOP NAMIBIA (DWN)	Implementation consultant, technical coordinator, and project facilitator.	Project conceptual planning support and strategy; Technical coordination with UDA, Knight Piésold, and surveyors; Stakeholder engagement and community consultation facilitation; Preparation and implementation of EMP and ESHS measures; On-site supervision and construction monitoring; Capacity building and training for contractors and local stakeholders.	Entire project lifecycle.
FUNDING & DEVELOPMENT PARTNERS	Provide financial and technical support.	Support for planning, design, and implementation.	All phases.
LOCAL COMMUNITIES AND RESIDENTS	Primary beneficiaries and directly affected stakeholders.	Public consultations, feedback meetings, grievance mechanism participation.	Throughout the project lifecycle.
URBAN DYNAMICS AFRICA (UDA)	Township layout design, statutory planning application, and consultation.	Prepare and submit layout to Town Council for initial approval; Submit final layout to MURD for statutory approval; Prepare Screening Report and ECC application to MEFT; Facilitate community engagement during planning and approval stages.	Planning phase.
KNIGHT PIÉSOLD (KP) CONSULTING	Engineering design, flood risk study, monitoring and sign-off on construction activities.	Technical design, construction monitoring, and quality assurance.	Planning to construction phase.

STAKEHOLDER	ROLE / RESPONSIBILITY	ENGAGEMENT OR KEY ACTIONS	INDICATIVE TIMELINE
MINISTRY OF URBAN AND RURAL DEVELOPMENT (MURD)	Approves township establishment application.	Review and statutory final approval.	During layout application stage.
MINISTRY OF ENVIRONMENT, FORESTRY AND TOURSIM (MEFT)	Approves ECC and ensures environmental compliance.	ECC application review and decision-making.	Pre-construction phase.
STRYDOM & ASSOCIATES (LAND SURVEYOR)	Aerial photography, cadastral surveys, and final layout confirmation.	Provide aerial mapping for planning and design; Conduct cadastral surveys and confirm layout boundaries.	Planning stage.
CONVEYANCERS	Legal registration of townships and erven.	Registration of legal documents and follow-ups.	Post-approval phase.
CONTRACTORS (TBC)	Construction and infrastructure implementation.	EMP compliance, on-site environmental and social management.	Construction phase.

3 ROLES AND RESPONSIBILITIES

This section outlines the roles and responsibilities of the key stakeholders involved in the implementation and management of the ESMP during the construction phase of the Omakango Proper infrastructure development project. Effective implementation of this ESMP requires clear allocation of responsibilities and coordination between DWN, the Engineer, the Construction Contractor, and relevant authorities.

3.1 DEVELOPMENT WORKSHOP NAMIBIA (DWN)

DWN, as the Project Proponent and Employer, retains overall responsibility and accountability for ensuring that the Project is implemented in compliance with the ECC, applicable environmental legislation, and funder requirements.

DWN's responsibilities include:

- Ensuring compliance with the conditions of the ECC and relevant legal and funder requirements;
- Monitoring environmental and social compliance at an oversight and programme level, including review of monitoring reports, audits, and compliance documentation;
- Ensuring that appropriate corrective actions are taken where non-compliance with the ECC or ESMP is identified, in coordination with the Engineer;
- Maintaining communication with regulatory authorities on matters related to environmental compliance;
- Supporting strategic stakeholder engagement and responding to escalated grievances; and
- Ensuring that adequate resources are available for effective environmental and social management.

The DWN Programme Manager holds overall accountability for ESMP compliance, supported by DWN Environmental, Social, and Health and Safety (ESHS) personnel.

3.2 ENGINEER (KNIGHT PIÉSOLD CONSULTING (PTY) LTD)

Knight Piésold Consulting (Pty) Ltd (KP) has been appointed as the Engineer for the Project and is responsible for the technical and contractual oversight of construction activities.

KP's responsibilities include:

- Reviewing and approving engineering designs, construction drawings, and construction-related submissions;
- Reviewing and approving method statements and work plans, including those with environmental and social implications;

- Ensuring that environmental and social requirements are integrated into construction approvals and instructions;
- Identifying non-compliance with approved designs, specifications, and ESMP requirements during construction; and
- Issuing instructions to the Contractor to address non-compliances, where required, on behalf of DWN.

KP's role focuses on approval, instruction, and contractual enforcement, rather than programme-level environmental oversight.

3.3 CONSTRUCTION CONTRACTOR

The appointed Construction Contractor (to be confirmed) is responsible for the day-to-day implementation of the ESMP on site and for ensuring that all construction activities comply with the requirements of this ESMP, the ECC, and approved designs.

The Contractor's responsibilities include:

- Implementing all mitigation, management, and monitoring measures contained in this ESMP;
- Ensuring that construction activities comply with applicable environmental, social, health and safety requirements;
- Preparing and implementing site-specific method statements and management plans consistent with this ESMP;
- Maintaining records of environmental and social performance;
- Reporting environmental and social incidents, non-compliances, and grievances to the Engineer and DWN without delay;
- Ensuring that all subcontractors comply with the requirements of this ESMP; and
- Cooperating with DWN and the Engineer during inspections, audits, and monitoring activities.

The Contractor remains fully responsible for environmental and social performance during construction.

3.4 OTHER AUTHORITIES AND STAKEHOLDERS

The Ondangwa Town Council and other relevant authorities will be informed of the ESMP and may be involved in Project oversight in accordance with their statutory mandates. Their roles relate primarily to regulatory compliance, service provision, and coordination rather than direct implementation of the ESMP.

3.5 TRAINING AND AWARENESS

Environmental, social, health and safety induction training shall be provided to all Contractor personnel prior to commencement of construction activities and to new workers joining the site thereafter.

The Contractor shall be responsible for delivering induction and refresher training. DWN will monitor compliance with training requirements through review of training records and audits, and the Engineer will verify compliance during construction oversight activities.

Training shall cover, at a minimum:

- The requirements and mitigation measures contained in this ESMP;
- Environmental sensitivities of the Project area, including low-lying and flood-prone areas;
- Occupational health and safety rules and procedures;
- Worker rights and the Grievance Mechanism;
- Community interaction protocols and Codes of Conduct; and
- Procedures for reporting incidents and responding to emergency situations.

Records of all training sessions shall be maintained and made available upon request.

4 PROJECT STANDARDS

This section outlines the environmental, social, health and safety standards, legal requirements, and best practice guidelines that apply to the construction phase of the Omakango Proper infrastructure development Project. Compliance with these standards is mandatory for all parties involved in the implementation of the Project, including the Construction Contractor and subcontractors.

4.1 REGULATORY FRAMEWORK

The regulatory framework for the Omakango Project is based on various national laws, policies, and regulations. Below are the key themes and their related legislation, including the provisions and project implications:

Table 3: Regulatory Framework

THEME	LEGISLATION	PROVISION	PROJECT IMPLICATIONS
NATIONAL ENVIRONMENTAL	The Constitution of the Republic of Namibia First Amendment Act, 34 of 1998	Article 16(1) guarantees property rights; Article 95(i) mandates sustainable ecosystem management.	Supports freehold title ownership and mandates sustainable environmental management.
	Environmental Management Act, 7 of 2007	Section 27 requires environmental assessments for significant projects; Section 2(b-c) mandates public participation.	Requires obtaining an Environmental Clearance Certificate (ECC) and conducting public consultations.
	EIA Regulations GN 57/2007 (GG 3812)	Section 10(1) lists activities requiring environmental clearance, including public roads, pipelines, and water abstraction.	Must follow ECC procedures and conduct public consultations as per regulations.
	Environmental Management Act, 7 of 2007	Regulates noise pollution, dust control, and land rehabilitation.	Construction activities must minimize noise, control dust, and restore disturbed land to prevent hazards to nearby communities.

THEME	LEGISLATION	PROVISION	PROJECT IMPLICATIONS
INFRASTRUCTURE	EIA Regulations GN 57/2007 (GG 3812)	Section 10.1(a) covers pipeline construction; Section 10.1(b) covers public roads.	ECC must be obtained for infrastructure development, including pipelines and roads.
	EIA Regulations GN 57/2007 (GG 3812)	Section 9.1 regulates hazardous substances; Section 9.2 covers pollution, effluent, and waste permits.	Requires safe handling, storage, and disposal of hazardous substances per legal requirements.
HAZARDOUS SUBSTANCES			
	EIA Regulations GN 57/2007 (GG 3812)	Section 8.2 prohibits groundwater abstraction beyond legal thresholds.	Water abstraction permits may be required for project activities.
ROAD & INFRASTRUCTURE	EIA Regulations GN 57/2007 (GG 3812)	Section 10.2 regulates road construction.	ECC is required for road development and related infrastructure.
	Forestry Act, 12 of 2001	Section 22(1) prohibits removal of trees without a permit.	Permits are required for removal of protected species; environmental safeguards must be in place.
FORESTRY	Forest Regulations GN 170/2015 (GG 5801)	Section 13.2 prohibits removal of protected species without special permission.	Must secure permits before removing protected plant species.

THEME	LEGISLATION	PROVISION	PROJECT IMPLICATIONS
HEALTH & SAFETY	Labour Act, 11 of 2007	Regulates employee rights, conditions of employment, and prohibits child/forced labour.	Requires compliance with labour laws and promotion of local employment.
	Public and Environmental Health Act of 2015 (GG 5740)	Regulates health standards, waste management, and water quality.	Contractors must ensure compliance with health and safety regulations.
	Health and Safety Regulations of 2011 (GN 156/2011)	Covers workplace safety, protective equipment, and accident prevention.	Occupational health and safety measures must be in place.
	Atmospheric Pollution Prevention Ordinance No. 45 of 1965	Regulates emissions, including noxious gases, smoke, and dust.	Air emissions permits may be required.
ATMOSPHERIC POLLUTION	National Heritage Act, 27 of 2004	Section 48(1) requires permits for activities impacting heritage sites.	Any archaeological findings must be reported to the National Heritage Council.
	Burial Place Ordinance 27 of 1966	Prohibits disturbance of graves.	If graves are encountered, proper exhumation procedures must be followed.
ARCHAEOLOGY			

THEME	LEGISLATION	PROVISION	PROJECT IMPLICATIONS
SOIL CONSERVATION	Soil Conservation Act, 76 of 1969	Regulates soil erosion prevention and conservation.	Measures must be implemented to prevent soil erosion and degradation.
	Urban and Regional Planning Act, 7 of 2018	Regulates township establishment, amendments, and rezoning.	Requires approvals from the Ministry of Urban and Rural Development.
WASTE MANAGEMENT	Ondangwa Amendment Town Planning Scheme	Defines permitted land uses in Ondangwa.	Project must comply with the Ondangwa Town Planning Scheme.
	Waste Management and Pollution Control Act	Regulates solid and hazardous waste disposal.	Requires compliance with waste management and effluent discharge standards.
	Hazardous Substances Ordinance, 14 of 1974	Regulates hazardous material handling and disposal.	Safe handling and disposal of hazardous materials must be ensured.
	Labour Act, 11 of 2007	Ensures fair working conditions and prohibits discrimination.	Requires fair wages, skills development, and non-discriminatory employment practices.
	Gender Policy	Promotes women's empowerment in employment.	Equal employment opportunities for women must be ensured.

THEME	LEGISLATION	PROVISION	PROJECT IMPLICATIONS
CHILD LABOUR	Labour Act, 11 of 2007	Section 1.4(b) prohibits child labour and underage employment in hazardous occupations.	Strictly prohibits child labour; compliance with employment age requirements is mandatory.
	ILO Convention 138 (1973)	Sets minimum employment age at 13 for non-hazardous work and 18 for hazardous work.	Aligns with international standards to prevent child labour.
	Child Care and Protection Act, 3 of 2015	Section 8(1) bans child labour in all sectors.	No child labour allowed; legal protections must be upheld.
WORKER RIGHTS	ILO Convention 29 (1930)	Prohibits forced labour.	Must ensure no forced labour practices.
	ILO Convention 87 (1948)	Guarantees workers' right to join trade unions.	Workers must have the right to union membership and organisation.
	ILO Convention 98 (1949)	Protects the right to collective bargaining.	Workers' rights to collective bargaining must be upheld.
	ILO Convention 100 (1951)	Requires equal pay for equal work.	Must ensure gender pay equality.
	ILO Convention 111 (1958)	Prohibits employment discrimination.	Hiring and working conditions must be non-discriminatory.

4.2 INTERNATIONAL LENDER STANDARDS

The development is funded by official development assistance from the Government of the Federal Republic of Germany. Consequently, the program must adhere to the regulations set forth by the Federal Ministry for Economic Cooperation and Development and the Kreditanstalt für Wiederaufbau (KfW) Development Bank. KfW aligns with the principles outlined in the Environmental and Social Standards (ESS) of the World Bank Group. The following sections detail the pertinent international criteria and standards that must be followed throughout the Program.

4.2.1 KfW's Sustainability Guideline

All the Financial Cooperation measures financed by KfW must be subject to assessment and implementation in terms of KfW's Sustainability Guideline 2021, or its successor. The guideline describes the principles and procedures to assess the environmental, social and climate impacts during the preparation and implementation of FC measure financed by KfW.

The KfW Sustainability Guideline (2021) sets out that the relevant national law and legal requirements as well as the ESS of the World Bank Group are compulsory during the identification and assessment of environmental, social and climate risks and impacts. Additionally, the World Bank's General and sector-specific Environmental, Health and Safety (EHS) Guidelines and the core labour standards of the International Labour Organization (ILO) must be applied. During the assessment, the requirements of the Human Rights Guidelines of the BMZ must be taken into account.

4.2.2 World Bank Environmental and Social Framework

The World Bank's Environmental and Social Framework (ESF) is aimed at enabling the World Bank and Borrowers to manage environmental and social risks of projects and to improve development outcomes. The ESF offers broad and systematic coverage of environmental and social risks. The ESF sets out the World Bank Group's commitment to sustainable development, through a Vision for Sustainable Development, a Policy for Investment Project Financing, and a set of ESS.

KfW's Sustainability Guideline (2021) requires the application of the World Bank's ESS to their projects, but not the overall ESF.

4.2.3 World Bank Environmental and Social Standards (2018)

The World Bank's ESS consists of ten standards as summarised below. Application of the standards intends to: (a) support Borrowers in achieving good international practice relating to environmental and social sustainability; (b) assist Borrowers in fulfilling their national and international environmental and social obligations; (c) enhance non-discrimination, transparency,

participation, accountability, and governance; and (d) enhance the sustainable development outcomes of projects through ongoing stakeholder engagement.

KfW's Sustainability Guideline (2021) requires the application of the relevant ESS. The likely applicability of each standard to the DWN Programme is indicated. A review must be undertaken for each intervention to confirm (based on scope, locality, and site specifics) the applicability of the ESS.

5 STAKEHOLDER ENGAGEMENT AND GRIEVANCE MECHANISM

Stakeholder engagement for the Project was undertaken as part of the Environmental Scoping Assessment (ESA) process in accordance with the Environmental Management Act, 2007 and the Environmental Impact Assessment Regulations, 2012.

The purpose of stakeholder engagement during the **construction phase** is to ensure effective communication with affected communities, manage concerns that may arise during construction activities, and provide a transparent mechanism for addressing grievances. This ESMP does not reassess impacts identified during the ESA.

5.1 STAKEHOLDER ENGAGEMENT DURING CONSTRUCTION

During the construction phase, stakeholder engagement will focus on:

- Informing affected communities and stakeholders about construction activities, schedules, and potential temporary disturbances;
- Maintaining communication with the Ondangwa Town Council and relevant authorities;
- Responding to concerns related to construction activities; and
- Supporting community health, safety, and wellbeing during Project implementation.

Engagement methods during construction will be proportionate to the scale of activities and may include direct communication, site notices, and liaison through appropriate representatives, as required.

5.2 GRIEVANCE MECHANISM

A Grievance Mechanism shall be implemented for the Project to allow community members, workers, and other stakeholders to raise concerns or complaints related to construction activities.

The Grievance Mechanism shall be accessible, transparent, and free of charge. Grievances may be submitted verbally or in writing using the grievance form provided in **Annexure 2**.

Grievances may relate to, but are not limited to:

- Noise, dust, or traffic disturbances;
- Health and safety concerns;
- Damage to property;
- Labour and working conditions; or
- Any other environmental or social issues associated with construction activities.

5.3 GRIEVANCE MANAGEMENT PROCESS

The grievance management process shall include the following steps:

1) **Receipt and Registration**

All grievances shall be recorded in a grievance register by the Construction Contractor.

2) **Acknowledgement**

Receipt of grievances shall be acknowledged within a reasonable timeframe.

3) **Investigation and Response**

Grievances shall be investigated, and appropriate corrective actions shall be implemented where required.

4) **Resolution and Close-Out**

Complainants shall be informed of the outcome. Where feasible, grievances should be resolved within **20 working days** of receipt.

Unresolved or escalated grievances shall be referred to Development Workshop Namibia (DWN) for review and further action.

5.4 ROLES AND RESPONSIBILITIES

- The **Construction Contractor** is responsible for day-to-day stakeholder engagement related to construction activities and for managing the grievance register.
- **Development Workshop Namibia (DWN)** shall provide oversight of stakeholder engagement and grievance management to ensure compliance with the Environmental Clearance Certificate and this ESMP.
- The **Engineer** shall be informed of grievances that may affect construction activities or contractual compliance.

5.5 RECORDS AND REPORTING

Records of stakeholder engagement activities and grievances shall be maintained by the Construction Contractor and made available to DWN and the Engineer upon request. A summary of grievances and their resolution shall be included in regular environmental and social reporting during construction.

6 REGISTER OF ENVIRONMENTAL AND SOCIAL ASPECTS

This section presents the Register of Environmental and Social (E&S) Aspects associated with the construction phase of the Omakango Proper infrastructure development Project.

The register is informed by the findings of the ESA and relevant engineering inputs. It does not reassess impacts, but identifies the key environmental and social aspects that require management during construction and provides a reference to the applicable mitigation and management measures contained in this ESMP.

The register serves as a practical tool to support implementation, monitoring, and compliance with the ECC, applicable legislation, and funder requirements.

6.1 PURPOSE OF THE REGISTER

The purpose of the Register of Environmental and Social Aspects is to:

- Identify key environmental and social aspects associated with construction activities;
- Highlight potential risks that may arise during the construction phase;
- Provide a structured link between identified aspects and the mitigation and management measures contained in this ESMP;
- Support effective implementation, monitoring, and reporting; and
- Ensure compliance with the Environmental Clearance Certificate and relevant standards.

6.2 REGISTER OF ENVIRONMENTAL AND SOCIAL ASPECTS

The table below summarises the key environmental and social aspects associated with construction activities and provides a reference to the relevant management measures contained in this ESMP.

Table 4: Register of Environmental and Social Aspects (Construction Phase)

Construction Activity	Environmental / Social Aspect	Potential Impact / Risk	Relevant Reference	ESMP
Site clearance and vegetation removal	Vegetation disturbance	Loss of vegetation; disturbance of protected trees	Section 7 – ESMP Action Table	
Earthworks and excavation	Soil disturbance	Soil erosion; sedimentation; dust generation	Section 7 – ESMP Action Table	
Filling of low-lying areas	Alteration of surface levels	Changes in drainage patterns; flood risk if unmanaged	Section 7 – ESMP Action Table	
Road construction	Increased traffic and access	Traffic safety risks; community disturbance	Section 7 – ESMP Action Table	
Construction activities	Dust and noise	Nuisance to nearby residents	Section 7 – ESMP Action Table	
Waste generation	Solid and hazardous waste	Pollution; health and safety risks	Section 7 – ESMP Action Table	
Use of machinery and equipment	Fuel and oil handling	Soil and water contamination	Section 7 – ESMP Action Table	
Workforce presence	Occupational health and safety	Injury or accidents	Section 7 – ESMP Action Table	
Workforce interaction with community	Community health and safety	Conflict; safety risks	Section 7 – ESMP Action Table	
Employment of workers	Labour and working conditions	Labour rights non-compliance	Section 7 – ESMP Action Table	
Construction-related impacts	Stakeholder concerns	Complaints or grievances	Section 5 – Stakeholder Engagement	

6.3 LINK TO ESMP IMPLEMENTATION MEASURES

The environmental and social aspects identified in the register are addressed through the mitigation, management, and monitoring measures set out in:

- Section 7: Project Implementation – ESMP; and
- The associated ESMP Action Tables, which define responsibilities, monitoring requirements, and performance indicators.

6.4 UPDATING OF THE REGISTER

The Register of Environmental and Social Aspects is a living component of the ESMP and may be updated, where necessary, to reflect changes in construction methods, sequencing, or site conditions, provided that such changes remain within the scope of the approved Environmental Clearance Certificate.

Any updates to the register shall be reviewed and approved by Development Workshop Namibia in coordination with the Engineer prior to implementation.

7 PROJECT IMPLEMENTATION – ESMP

Implementation of the ESMP during the construction phase will be guided by the framework outlined in Table 7-1 below. The table defines how ESMP requirements are implemented, enforced, and integrated into construction activities.

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
7.1 A. GENERAL REQUIREMENTS FOR ESHS MANAGEMENT				
<u>A1. Responsibilities and Liabilities</u>	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. Contracts with subcontractors and suppliers	Contractor/DWN	Review of training records Review of Contracts to ensure that Project requirements are included
	Adjust this ESMP template to be project specific, define the frequency of the monitoring procedure and share it with DWN and KfW. Identify if further Management Plans are required and prepare these.	Final Project-specific ESMP Requisite Management Plans	Contractor/DWN	Review final ESMP and Management Plans prior to commencement of work 'No objection' from KfW for final ESMP

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
7.1 A. GENERAL REQUIREMENTS FOR ESHS MANAGEMENT				
<u>A2. Resources allocated to ESHS Management</u>	Assign ESHS responsible staff ¹ 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
A3. Reporting	Reporting of progress and incidents, accidents, observations, near misses.	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
A4. 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 (see Annex A)	Contractor/DWN	Review of Code of Conduct induction records Review of reported punishable or misconduct behaviour Review of grievance records

¹ 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
7.1 A. GENERAL REQUIREMENTS FOR ESHS MANAGEMENT				
A5. ESHS Training	Provide induction, training, and awareness to the workforce regarding ESHS risks and mitigation measures (including indirect workers) tailored to Project scope.	Training performed and recorded	Contractor/ DWN	Review of ESHS induction and training records

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
7.2 B. PROTECTION OF THE ENVIRONMENT:				
B1. Protection of adjacent areas	Ensure to keep the buffer distances from sensitive urban services and buildings (school, water supply for populations (borehole)); 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.
	Ensure that means of protection are in place to avoid or minimise adverse effects on vegetation, soils, groundwater and surface water, biodiversity, natural drainage and the water quality in areas within the works area. Construction methods to minimise impacts to the extent possible.	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 adjacent 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 Review of grievance records
	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

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
7.2 B. PROTECTION OF THE ENVIRONMENT:				
B11. Selection of borrow areas, backfill material stockpile sites and access road	Select areas to be excavated, backfill material stockpile locations and access roads if applicable to the project.	Designated areas selected	Contractor /DWN	Once during site selection
	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
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.	Ensure that potential pollutants are not stored and handled within 50 m of sensitive receptors (particularly boreholes).	Contractor /DWN	Regular site inspection Review of grievance records
B13. Effluents	Ensure appropriate containment and storage of construction wastewater, including sanitary water. No untreated effluent is discharged.	No untreated wastewater discharge	Contractor/DWN	Regular site inspection Review of grievance records
B14. Emissions and dust	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
	Ensure speed limits on site and when passing local receptor areas. Sensitise drivers.	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

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
7.2 B. PROTECTION OF THE ENVIRONMENT:				
B15. Noise	Avoid operations and vehicle movements at night.	No work conducted between 17:00 pm and 7:00 am	Contractor/ DWN	Random site inspection Review of grievance records Review of accident/incident records Review of training records
	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).	Distances between equipment and receptors are kept	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
	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
	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

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
7.2 B. PROTECTION OF THE ENVIRONMENT:				
B17. Vegetation clearing	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
	Appropriate and safe storage of fuels, construction materials, wastes and any materials that can cause spills (e.g. batteries from energy generators).	Safe storage of materials Spill response procedure Spill response and remediation equipment in place.	Contractor/ DWN	Regular site inspection
	Limit vegetation clearing to areas within the site boundary where it is strictly necessary.	Vegetation clearing minimal Marking the borders of works site boundaries	Contractor/ DWN	Site inspection prior to commencement of activities.
	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

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
7.2 B. PROTECTION OF THE ENVIRONMENT:				
	A tree survey should be conducted to identify protected tree species on the site. Avoid clearing mature trees and endangered species. Where removal of protected or red-listed tree species is unavoidable, the Construction Contractor shall obtain the necessary permits from the competent authority prior to removal, in accordance with the Forestry Act, 2001	No mature trees cleared Permits to remove protected trees	Contractor/ DWN	Site inspection prior to commencement of activities. Site inspection during site clearance
B18. Low-lying areas and surface water management	Ensure construction in low-lying and flood-prone areas follows approved designs and drainage layouts. Prevent obstruction of natural drainage paths. Manage filling activities to avoid ponding and increase flood risk.	Approved drawings; site inspections; no standing water observed after rainfall	Construction Contractor	Regular site inspections, especially after rainfall; DWN oversight
B19. Site rehabilitation	Ensure revegetation and restoration of cleared areas where possible after construction using native species.	Revegetation completed	Contractor/ DWN	Site inspection at completion
	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

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
7.3 C. HEALTH AND SAFETY				
C1. 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.	H&S Plan in place	Contractor/ DWN	Review of H&S Plan
C2. Accident reporting	Ensure all H&S related incidents (e.g. observations, accidents) on site are recorded and followed up properly. (See Annex D – Incident Reporting)	Incident recording process in place	Contractor/ DWN	Check incident/accident records
C3. Personal protective equipment	Ensure the provision of Personal Protective Equipment (PPE) for workers (hardhats, masks, safety glasses, safety boots etc).	PPE used by everyone on-site Training performed and recorded	Contractor/Site Manager	Random site inspection Review training records
C4. 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
	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

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
7.3 C. HEALTH AND SAFETY				
	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
C5. 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
C6. Access to health care	Ensure the workforce has access to primary healthcare on site, providing prescriptions and vaccinations.	Healthcare available on site Medical surveillance records	Contractor/ DWN	Random site inspection Review of grievance records Review of medical records (in case not confidential)
	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
C7. 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
7.3 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
7.4 D. LABOUR AND RELATIONS WITH LOCAL COMMUNITIES				
D1. 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. (See Annex B – Grievance Mechanism)	Grievance Mechanism in place and grievances recorded Training performed and recorded	Contractor/ DWN	Review of grievance register Review of training records
	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
D2. Local recruitment	Ensure local communities are preferred for the supply of goods and services to the Project and Project personnel, where appropriate.	Local Procurement and Employment Records	Contractor/ DWN	Review procurement and employment rules and records Review of grievance register

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
7.4 D. LABOUR AND RELATIONS WITH LOCAL COMMUNITIES				
D3. Community interaction	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	Contractor/ DWN	Review of grievance register Minutes of consultation meetings
	Initiate an efficient Grievance Mechanism to allow potentially affected individuals to raise their concerns	Grievance Mechanism in place (See Annex B). Grievances recorded	Contractor/ DWN	Review of grievance register
D4. 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, dangers of sexually transmissible diseases and HIV/AIDS, gender equality and sexual harassment, respect for the beliefs and customs of the populations and community relations in general).	Code of Conduct (See Annex A). Grievance Mechanism records	Contractor/ DWN	Worker interviews, Review of grievance register

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
7.4 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
D5.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 (See Annex E)	Contractor/ DWN	Once during site selection Review of grievance log Follow up of land acquisition/compensation process
D6. 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
	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 lay down areas.	Warning signs Minutes of Meetings	Contractor/ DWN	Inspection if traffic routes, Review of grievance register

Item	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure
7.4 D. LABOUR AND RELATIONS WITH LOCAL COMMUNITIES				
D7 Fossils/ Archaeological Chance Finds	Establish specific procedures to manage the protection of archaeological and historical sites, chance finds, and fossils. Ensure all finds of cultural heritage (e.g. graves, old ceramic, old building fragments) are reported immediately to the relevant authority and avoid excavation in the ultimate neighbourhood of a chance find, fence the chance find and await instructions from the competent authority.	Chance Finds Procedure Notification records to relevant authority Training records, Records about chance finds	Contractor/ DWN	Site inspection Review records of chance finds

Practical site 'Do's and Don'ts' for environmental, social and health and safety management are provided in **Annexure 5** and shall form part of contractor induction and site awareness.

8 ESMP MONITORING

DWN will provide oversight monitoring to ensure that the ESMP is implemented by the Construction Contractor and all subcontractors in accordance with the ECC and this ESMP.

Monitoring of ESMP commitments shall be undertaken using an ESMP Monitoring Table, which may be amended as required but shall include, as a minimum:

- ESMP commitments;
- Date of inspection;
- Findings and observations (including colour coding: red / amber / green);
- Defined corrective actions, where applicable.

The Construction Contractor shall undertake internal monitoring of ESMP implementation on a regular basis. The person responsible for ESMP implementation at the Contractor shall conduct site inspections using the ESMP commitments as a reference and record compliance status and any corrective actions in the ESMP Monitoring Table.

The frequency of monitoring shall be proportionate to the environmental and social risks of the Project, but shall be at least once per month. The Contractor shall report on environmental, social, health and safety (ESHS) performance and progress to DWN on a monthly basis.

Any environmental or occupational health and safety incidents observed or reported by construction workers shall be reported to DWN immediately, in accordance with the Incident Reporting Procedure outlined in Section 9 and the Incident Reporting Template provided in Annex 4.

Table 5: EMP Monitoring Table

Topic/ Potential Impact	Mitigation, Management and Enhancement Measures	Means Verification	Responsibility	Monitoring Procedure	Date of Inspection/ Review/ EMP Monitoring	
					DD/MM/JJ	
Occupational Health and Safety					Findings/ Observations	Corrective Action
...						
...						
Ambient Air					Findings/ Observations	Corrective Action
...						

Colour Code for Findings/ Observations
Red Flag. Major Non-compliance with EMP requirements. Urgent Action needed to protect ecological and human environment and avoid risks to the Project schedule.
Minor Non-compliance. Action needed but no immediate threat for ecological and human environment or Project schedule.
In compliance with EMP commitment.

9 INCIDENT REPORTING

This section outlines the procedures for reporting environmental, social, health and safety (ESHS) incidents that may occur during the construction phase of the Omakango Proper infrastructure development Project.

The objective of incident reporting is to ensure that incidents are promptly identified, reported, investigated, and addressed, and that appropriate corrective and preventive measures are implemented to prevent recurrence.

9.1 DEFINITION OF A SERIOUS INCIDENT

For the purposes of this ESMP, a serious incident is defined as:

"Any unplanned or uncontrolled event arising from Project-related activities that has resulted in, or could reasonably result in, significant adverse impacts on workers, community members, property, or the environment, or that may pose legal, compliance, or reputational risks to the Project."

9.2 TYPES OF SERIOUS INCIDENTS

Serious incidents may include, but are not limited to:

- Fatalities or serious injuries to workers;
- Fatalities or serious injuries affecting members of the public or local communities;
- Occupational accidents requiring medical treatment or hospitalisation;
- Major environmental incidents, including significant spills or contamination of soil or water;
- Fires, explosions, or major equipment failures;
- Traffic accidents involving Project vehicles resulting in injury, fatality, or significant damage;
- Incidents involving sexual exploitation, abuse, or harassment;
- Serious community conflict associated with Project activities; and
- Any incident that may result in regulatory enforcement, legal proceedings, or significant reputational risk.

9.3 INCIDENT REPORTING PROCEDURE

All incidents, including near misses, shall be recorded by the Construction Contractor in accordance with site-specific procedures.

In the event of a serious incident:

- The Construction Contractor shall notify Development Workshop Namibia (DWN) immediately upon becoming aware of the incident.
- DWN shall report the serious incident to the KfW Development Bank within 48 hours of receiving information about the occurrence.
- Where full details are not immediately available, an initial notification shall be submitted, followed by a comprehensive incident report once further information becomes available.

Incident reports shall include, as a minimum:

- A description of the incident and location;
- Date and time of occurrence;
- Persons affected;
- Immediate response actions taken;
- Preliminary assessment of causes; and
- Proposed corrective and preventive measures.

9.4 INVESTIGATION AND CORRECTIVE ACTIONS

All serious incidents shall be investigated to identify root causes and contributing factors.

Corrective and preventive measures shall be implemented by the Construction Contractor under the oversight of DWN. Where applicable, findings from formal investigations, regulatory inquiries, or legal proceedings shall be documented and made available to DWN and the relevant authorities.

9.5 RECORD KEEPING AND LINK TO MONITORING

Records of all incidents, investigations, and corrective actions shall be maintained on site by the Construction Contractor and made available to DWN upon request.

Incident records shall inform ongoing ESMP monitoring and review activities as described in **Section 8**, and trends identified through incident reporting shall be used to improve environmental, social, and health and safety performance.

10 EMERGENCY PREPAREDNESS AND RESPONSE

Emergency preparedness and response measures will be implemented during the construction phase of the Omakango Proper infrastructure development Project to ensure the safety of workers, surrounding communities, and the environment.

The Construction Contractor shall establish and maintain basic emergency response procedures appropriate to the nature and scale of the construction activities. These shall include measures to respond to:

- Medical emergencies and serious injuries;
- Fires associated with construction activities or fuel handling;
- Spills of fuels, oils, or hazardous substances; and
- Flooding or severe weather events, particularly in low-lying areas.

In the event of a medical emergency, immediate first aid shall be provided on site, and injured or ill personnel shall be transported to the nearest appropriate medical facility, which is located in Ondangwa. Emergency contact details shall be displayed on site and communicated to all workers during induction training.

Basic emergency response equipment, including first-aid kits, fire-fighting equipment, and spill response materials, shall be available on site and maintained in good working condition.

All workers shall receive induction training on emergency procedures, and emergencies resulting in or having the potential to result in serious incidents shall be reported in accordance with **Section 9: Incident Reporting**.

11 CONCLUSION

This Environmental and Social Management Plan (ESMP) has been prepared to guide the management of environmental, social, health and safety risks associated with the construction phase of the Omakango Proper township infrastructure development Project.

The ESMP translates the findings of the approved Environmental Scoping Assessment and the requirements of the Environmental Clearance Certificate into practical mitigation, monitoring, and reporting measures to be implemented during construction. Roles and responsibilities for ESMP implementation, oversight, and monitoring are clearly defined.

Through the application of the measures set out in this ESMP, the Project aims to minimise adverse environmental and social impacts, protect worker and community safety, and ensure compliance with applicable Namibian legislation and relevant funder requirements.

Effective implementation of this ESMP will support responsible and sustainable delivery of the Project in line with national and international best practice.