



ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP)



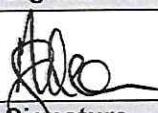
(Old police station structure, 2025)

DEVELOPMENT OF A LODGE, CAMPSITE AND ASSOCIATED ADVENTURE ACTIVITIES IN THE ORANGE RIVER TOURISM CONCESSION OF THE TSAU //KHAEB (SPERRGEBIET) NATIONAL PARK

Prepared for:



August 2025

DOCUMENT INFORMATION		
Title	Environmental and Social Management Plan (ESMP) for the Development of a Lodge, Campsite and Associated Adventure Activities in the Orange River Tourism Concession of The Tsau //Khaeb (Sperrgebiet) National Park	
ECC Application Reference number	APP: 006235	
Listed Activity (EMA, Act No. 7 of 2007 and EIA regulations of 2012)	Activity 2. Waste Management, Treatment, Handling and Disposal 2.1 The construction of facilities for waste sites, treatment of waste and disposal of waste Activity 4. Forestry Activities 4.1 The clearance of forest areas, deforestation, afforestation, timber harvesting or any other related activity that requires authorization in terms of the Forest Act, 2001 (Act No. 12 of 2001) or any other law. Activity 6: Tourism Development 6. Construction of resorts, lodges, hotels or other tourism and hospitality facilities Activity 8. Water Resource Developments 8.1 The abstraction of ground or surface water for industrial or commercial purposes	
Location	The Tsau //Khaeb (Sperrgebiet) National Park, Orange River Concession, //Kharas Region	
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ACRONYMS

DEA	Department of Environmental Affairs
DSR	Draft Scoping Report
EA	Environmental Assessment
EAP	Environmental Assessment Practitioner
ECC	Environmental Clearance Certificate
ECO	Environmental Compliance Officer
EIA	Environmental Impact Assessment
EMA	Environmental Management Act (No. 7 of 2007)
EMP	Environmental Management Plan
ESR	Environmental Scoping Report
I&APs	Interested and Affected Parties
MAFWLR	Ministry of Agriculture, Fisheries, Water and Land Reform
MEFT	Ministry of Environment, Forestry and Tourism
SM	Site Manager
TEC	Tortoise Environmental Consultant

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1. INTRODUCTION

1.1 Overview of the Tsau //Khaeb National Park

The Tsau //Khaeb (Sperrgebiet) National Park (TKNSP) was proclaimed a national park in 2008 ((Tjhukununa , 2022). Formerly known as the “Sperrgebiet” or “Forbidden Area,” it was historically closed to the public for over a century due to diamond mining activities. Today, it forms part of the country’s largest conservation landscapes and is recognised for its ecological, geological, and cultural significance.

The park covers an area of 2.2 million hectares and is home to the Succulent Karoo biome, one of the world’s biodiversity hotspots, supporting unique plant and animal species adapted to the arid climate.

1.2 Project rationale

The Orange River Concession Project is proposed as part of the broader strategy to diversify the economic base of Oranjemund and reduce reliance on diamond mining, which is a finite resource (OMDis Town Transform Agency, 2025). With Namdeb’s closure envisaged and economic transformation identified as a priority in the Vision 2030 for Oranjemund, OMDis was established as a non-profit Special Purpose Vehicle to proactively accelerate the economic diversification of Oranjemund alongside mining and beyond.

Tourism development within the Tsau //Khaeb (Sperrgebiet) National Park (TKNSP) has been identified as a key driver for socio-economic transformation. The concession will leverage the park’s unique ecological, cultural, and adventure tourism potential to:

- Create sustainable employment and skills development opportunities for residents.
- Support the growth of existing small and medium enterprises (SMEs) and encourage entrepreneurship.
- Enhance Oranjemund’s profile as a tourism hub by integrating heritage, adventure, and eco-tourism experiences.
- Promote cross-border tourism synergies with South Africa through the Ai-Ais Richtersveld Transfrontier Park.

1.3 Project Location – Hohenfels Concession

The Orange River Concession is situated in the south-western corner, between approximately 26° and 28.5°S latitude and 13° and 17°E longitude. Stretching roughly 320 km in a north-northeast to south-southwest direction, and covers an area of approximately 22150 hectares (guided tours – sand sea zone of 22000ha and adventure river zone- 2150ha) (OMDis Town Transform Agency, 2025)

The concession is situated on the banks of the Orange River, near Oranjemund, connects to the tourism route connecting Oranjemund to Rosh Pinah, Aus and Lüderitz.

Table 1-1: GPS Coordinates

Point	Longitude	Latitude
NW	16.604175	-28.505969
NE	16.617374	-28.505969
SE	16.611327	-28.521859
SW	16.604175	-28.521859

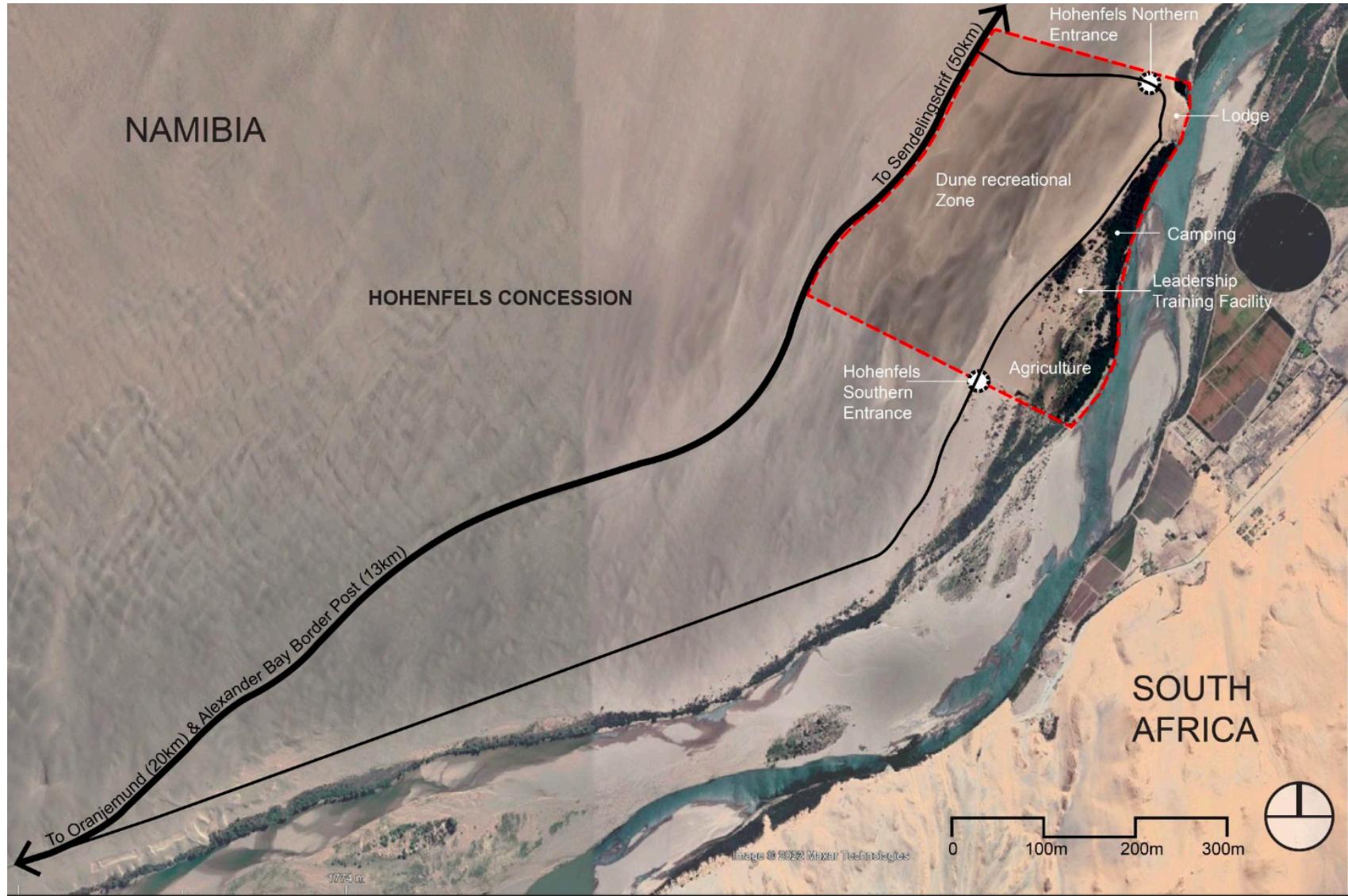


Figure 1-1: Hohenfels Tourism Concession

2. ENVIRONMENTAL MANAGEMENT PLAN CONTEXT

This document constitutes the Environmental Management Plan (EMP), for the proposed construction and operation of the lodge and campsites.

2.1 EMP Requirements

The Environmental Management Act (also referred to as the EMA), stipulates that for each developmental project, which is listed under the EIA regulations, an Environmental Impact Assessment (EIA) should be conducted.

The EMP should conform to the provisions of the Environmental Management Act (EMA), Act No. 7 of 2007 and EIA regulations of 2012 (Government Notice: 30).

The EIA Regulations defines a '*Management Plan*' as:

“...a plan that describes how activities that may have significant impacts on the environment are to be mitigated controlled and monitored.”

Table 2-1: EMP Requirements as outlined in Section 8 of the EIA Regulations

Requirement
<p>(j) a draft management plan, which includes –</p> <p>(aa) information on any proposed management, mitigation, protection or remedial measures to be undertaken to address the effects on the environment that have been identified including objectives in respect of the rehabilitation of the environment and closure;</p> <p>(bb) as far as is reasonably practicable, measures to rehabilitate the environment affected by the undertaking of the activity or specified activity to its natural or predetermined state or to a land use which conforms to the generally accepted principle of sustainable development; and</p> <p>(cc) a description of the manner in which the applicant intends to modify, remedy, control or stop any action, activity or process which causes pollution or environmental degradation remedy the cause of pollution or degradation and migration of pollutants.</p>

2.2 What is an EMP?

The Environmental Management Plan (EMP) is a tool used to mitigate potential environmental risks associated with the proposed project/activity and provides a risk management strategy and logical framework for the implementation of the activities associated with the proposed activity.

The EMP recommends mitigation measures in order to ensure that the proposed activities are conducted in an environmentally friendly manner and in accordance with the provisions of the Environmental Management Act and EIA regulations.

Furthermore, the EMP outlines specific roles and responsibilities for role-players against which they can be evaluated, and non-compliance is punishable.

2.3 EMP Objective

The objective of the EMP is to prevent/minimize (where possible), unacceptable and adverse environmental, social or economic impacts that may arise from the proposed development. Overall, the EMP aims to minimise negative impact/s (real, potential or perceived) that may result from the proposed tourism development.

The objective of the EMP is to prevent / minimize, unacceptable and adverse environmental, social or economic impacts identified during the EIA process. Overall, the EMP aims to minimise negative impact/s (real, potential or perceived) that may result from the proposed activities, throughout the project lifespan.

The aim of the EMP is to ensure that the proposed activities are conducted in accordance with the following:

- i. Environmental Management Act (No. 7 of 2007),
- ii. EIA regulations of 2012 (GN: 30), and
- iii. International standards, and
- iv. Best environmental practices (benchmarks)

2.4 EMP Scope

The EMP does not only focus, and it is not limited to the proposed construction and operation of the feedlot. It includes the bigger picture and serves as the guiding tool to protecting the natural, bio-physical and socio-economic environment on both the specific site and the surrounding area. The bigger picture is important because some impacts may not be confined to the project site.

2.5 Possible adjustments to the EMP

The EMP is an open-ended document and may be considered inconclusive. In other words, the EMP should allow room for adjustments if new information becomes available at a later stage, in which new/additional mitigation measures may become necessary.

The necessity of possible adjustments to the EMP at a later stage may be attributed to:

- a) Lack of information at the time of drafting the initial EMP,
- b) Evolution or addition of new activities, or
- c) Unintended omission of potential impacts during the initial EIA scoping exercise and development of the initial EMP.
- d) Development of industry best practices.

This implies that, in addition to the information contained herein, any other relevant information that may surface during the renovation, construction and operations, through internal monitoring or auditing by the Environmental Compliance Officers (ECOs), can be added to the EMP (evolution of activities), and such changes or inclusions will be

binding to the proponent and all contractors / sub-contractors.

2.6 Implementation Framework and Accountability to the EMP

For effective implementation of the EMP, the Institutional roles are presented below. However, the institutional framework, as well as the specific roles and responsibilities are defined and broken down in Sections 4 and 5 respectively.

Table 2-2: Role players, Institutional Framework

Role-player	Company / Institution	Role
Proponent	OMDis	Compliance to the EMP
Environmental Consultant	Tortoise Environmental Consultants (TEC)	Development of the EMP
Environmental Compliance Officer/s (ECO)	Ministry of Environment, Forestry and Tourism – Department of Environmental Affairs (DEA)	Monitoring Compliance with EMP: ➤ Un-announced spot checks, ➤ Corrective measures, warnings, penalties/fines, license suspension, etc
Public	Interested and affected parties (I&APs)	Report to the ECO, any activity of environmental concern (e.g. Pollution, safety risks, etc.)

3. ROLES AND RESPONSIBILITIES

This section outlines the roles and responsibilities of the key personnel responsible for the day-to-day management of activities to ensure effective implementation of the EMP.

3.1 Roles and Responsibilities

To ensure accountability, it is necessary to assign responsibilities. The key role-players for project implementation are;

- a) The **Environmental Compliance Officer (ECO)** representing the Ministry of Environment, Forestry and Tourism (MEFT), or an appointed independent environmental officer, who is responsible for monitoring and auditing.
- b) **The Proponent**: Owner / Project Manager.
- c) **The Site Manager** the person responsible for the day-to-day management of the project.

3.1.1 The Environmental Compliance Officer (ECO):

The ECO refers to the party responsible for the environmental monitoring and auditing to ensure that the provisions of the EMP are complied with.

The ECO shall have adequate environmental knowledge to understand and interpret the EMP and pertaining environmental aspects associated with the project. The specific tasks of the ECO are as follows:

- To undertake all monitoring and auditing activities in-order to ensure compliance with the EMP.
- Conduct site inspection prior to the commencement of activities; and at reasonable intervals (e.g. every month, quarterly or annually), throughout the duration of the project. Depending on the risks, some projects may be inspected more frequently (e.g. every month).
- Conduct regular inspections (unannounced spot checks) and shall submit compliance or non-compliance reports to the respective authorities (MEFT or any other relevant authority).
- Compile Progress Reports immediately after site inspections, Compliance Reports, pertaining to any non-compliance incident/s, and a Rehabilitation Report following the conclusion a specific activity.
- The ECO shall liaise closely with all key stakeholders i.e. the Site Manager and the Environmental Commissioner.
- Shall provide guidance on any environmental management issues, incidents or emergencies that may arise throughout the project lifespan.
- Shall assist in providing recommendations for remedial action in the event of non-compliance.
- Auditing or monitoring activities may involve investigation, as well as structured observation, measurement, and evaluation of environmental data over a period of time.

3.1.2 The Proponent:

The specific responsibilities of the Proponent are as follows:

- Appoint a Project Manager (PM) to oversee the daily onsite activities.
- Liaise closely with the PM and ECO on any environmental management issues, incidents or emergencies.
- Ensure that all activities on and around the site are conducted in accordance with the requirements of the EMP at all times.
- Ensure that all sub-contractors and visitors to the site are conversant with the requirement of the EMP, relevant to their roles on site.
- Shall develop a **communication strategy** between The Proponent, Site Manager, workers, the ECO and any other relevant stakeholder.
- Shall develop an **organisational structure** to ensure that:
 - There are clear channels of communication;
 - There is an organisational hierarchy for effective implementation of the EMP; and
 - Conflicting or contradictory instructions are eliminated;
 - Ensure that all instructions and official communications regarding environmental matters shall follow the organisational structure as determined
 - Ensure that that EMP requirements are assigned to specific people / positions with the capacity and experience required for implementation.

3.1.3 The Site Manager:

The **Site Manager (SM)** should:

- Ensure that each team recruited to work at the sites, adheres to the EMP;
- Ensure that a copy of the EMP is kept on site at all times and as it may be requested by authorities conducting spot checks at any time.
- Ensure that all staff attend an induction session before the commencement of any work on site and that they are adequately informed of the requirements of the EMP;
- Shall take special care to prevent irreversible damage to the environment;
- Ensure that activities are within the boundaries of the proposed zones as specified in the Site Map and boundary markings (visible pegs, tape etc).
- Accident/ Incident reporting to Proponent within 24 hours of occurrence
- Ensure that staff is controlled through the implementation of appropriate security measures,

3.2 Instructions

All instructions and official communications shall follow the organizational structure as determined by the proponent. Based on the adopted structure, it is essential that the responsibilities outlined be assigned to specific parties with adequate capacity and experience required to implement the EMP.

3.3 Disciplinary Actions

The EMP is a legally binding document. Non-compliance with the EMP may result in disciplinary action being taken against the Proponent. Such actions may take the form of;

- Financial penalties, legal action, fines, and/ or Suspension of work.

The disciplinary actions shall be determined according to the nature and extend of the non-compliance, and exact penalties are to be weighed against the severity of the incident.

4. POTENTIAL IMPACTS AND MITIGATION MEASURES

4.1 Impact Themes and Recommended Mitigation Measures

The EMP has been categorised into different themes, which serve as a quick guide to the recommended EMP remedial actions during the construction and Operation stages (Table 4.1 to 4.8).

EMP Themes	Specific Aspects
A – Socio-economic Impacts	Employment
	Local economy
B – Staff induction	EMP availability
	Staff induction
	Recruitment
C – Health and Safety	General safety at workplace
	Alcohol abuse and Drug use
	Fire Risk / Hazard
D – Pollution and Waste Management	Wastewater
	Ablution facilities
	Solid Waste Disposal
	Oil Spills
E – Surface and Ground water	Water sources and abstraction
F – Community Health and Safety	Exposure of young children to alcohol and drug use
	Teenage pregnancies
	HIV / AIDS
G – Cultural Heritage	Heritage resources / artefacts
H – Rehabilitation	Clean-up and maintain natural / original appeal

SECTION A: SOCIO – ECONOMIC

Table 4-1: Identified socio-economic impacts

Potential Impacts:				
<ul style="list-style-type: none"> ✓ New employment opportunities (both during construction and operation of the project) ✓ Rural development 				
Aspect	Objective	Measures to enhance positive impacts	Indicators for Monitoring and Compliance	Responsible Party
Employment	Create employment opportunities	<ul style="list-style-type: none"> • Ensure recruitment of locals during Construction 	<ul style="list-style-type: none"> • Employment records – contracts 	Proponent / Contractor
Economic diversification	Reduce reliance on mining (diamond mining)	<ul style="list-style-type: none"> • Establishment of new campsite, luxury chalets, and a lodge as well as other businesses to support the growing industry. 	<ul style="list-style-type: none"> • Established campsites and lodge in the Orange River Concession • Diversified local economy • Income levels and livelihood improvements 	Proponent
Local economy and supply chains	Encourage procurement of materials and services from local supply chains.	<ul style="list-style-type: none"> • Procurement of materials and services from local suppliers. 	<ul style="list-style-type: none"> • Procurement records 	Proponent
Community investments	Improve livelihoods through various community investment initiatives.	<ul style="list-style-type: none"> • Provide support to the community through various community investment initiatives. 	<ul style="list-style-type: none"> • Number of community initiatives and programmes supported by the project. 	Proponent

SECTION B: STAFF INDUCTION

Table 4-2: Mitigation measures pertaining to staff Recruitment and Induction

Potential Sources of Impacts:				
Aspect	Objective	Mitigation Measures	Indicators for Monitoring and Compliance	Responsible Party
EMP availability	Availability of the EMP on site for ease of reference	<ul style="list-style-type: none"> Ensure that a copy of the EMP is kept on site and accessible to team leaders 	<ul style="list-style-type: none"> Availability of EMP on site and accessibility to team leaders 	Site Manager
Staff Induction	To ensure that all staff / employees are conversant with the requirements of the EMP	<ul style="list-style-type: none"> Induction for all staff / employees on the provisions of the EMP before work commencement. Staff members appointed at a later stage should also undergo induction 	<ul style="list-style-type: none"> Induction Minutes and Attendance Register, Signed by each staff member Quarterly minutes 	Site Manager
	Punitive measures for staff, to ensure compliance	<ul style="list-style-type: none"> Adopt a disciplinary system to discipline staff for non-compliance, for offences such as littering, speeding, safety risk (both to themselves and to others), not using ablution facilities, etc. 	<ul style="list-style-type: none"> Number of fines issued daily / per month 	Site Manager
	Orientation of workers about security for both equipment and themselves	<ul style="list-style-type: none"> Orientate workers about security for equipment and themselves & provide contact numbers for Police and other emergency services e.g. Ambulance 	<ul style="list-style-type: none"> Proof of security orientation and emergency contact numbers 	Site Manager

Recruitment	<ul style="list-style-type: none"> • To ensure that all workers have employment contracts (Labour Act No. 11 of 2007) • To ensure adherence to Labour Act No. 11 of 2007 during all phases of the project 	<ul style="list-style-type: none"> • Formalize recruitment of all staff with Contracts, stating nature of employment, duration and remuneration to protect both parties and to avoid labour disputes later. 	<ul style="list-style-type: none"> • Copy of staff contracts 	Proponent / Site Manager
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SECTION C: OCCUPATIONAL HEALTH AND SAFETY

Table 4-3: Mitigation measures pertaining to Health and Safety

Potential Sources of Impacts:				
Aspect	Objective	Mitigation Measures	Indicators for Monitoring and Compliance	Responsible Party
General Occupational Health and Safety of the employees (injuries)	To ensure safe working conditions per Health and Safety Regulations, Government Notice 156/1997 (GG 1617)	<ul style="list-style-type: none"> Provide adequate and appropriate personal protective equipment for all workers Training on relevant aspects of occupational health and safety. 	<ul style="list-style-type: none"> Adequate protective gear for all staff (issue register) Training schedule, attendance register, report, pictures, etc 	Site Manager
Alcohol abuse and Drug use	Prevent alcohol and drug use at the project site	<ul style="list-style-type: none"> Warn employees against alcohol abuse and use of prohibited substances e.g drugs. 	<ul style="list-style-type: none"> Drunk / Misbehaving employees Monitor presence of prohibited substances. 	Site Manager
Fire Risk / Hazard	To mitigate fire risk	<ul style="list-style-type: none"> Avail sufficient fire extinguishers and train staff on how to use them Demonstrate the use of fire extinguishers and fire hydrants, 	<ul style="list-style-type: none"> Availability of fire extinguishers and service record. Training report, attendance register, pictures, etc 	Site Manager

SECTION D: POLLUTION AND WASTE MANAGEMENT

Table 4-4: Mitigation measures pertaining to Waste Management

Potential Sources of Impacts:				
Aspect	Objective	Mitigation Measures	Indicators for Monitoring and Compliance	Responsible Party
Waste Water	<ul style="list-style-type: none"> • To avoid effluent discharge into the environment 	<ul style="list-style-type: none"> • Refer to regulations on effluent disposal and recommended septic tank and drainage design • Be on the look-out and repair any leaking or broken sewer pipes (regardless of how small it may be perceived) 	<ul style="list-style-type: none"> • No leakage of sewer pipes 	Site Manager or dedicated Plumber
Ablution facilities	<ul style="list-style-type: none"> • To avoid open defecation, environmental pollution and washing of faecal waste into water streams 	<ul style="list-style-type: none"> • Recommend Flushing toilets with provision of a containerized septic tank, honey suckled for disposal at approved oxidation ponds, or • Adequate pit latrines: Ventilated (closed air-vent), slab (removable), toilet pot (closed). 	<ul style="list-style-type: none"> • Ablution facilities (Flushing toilets) • Containerised septic tank 	Site Manager
Solid Waste	<ul style="list-style-type: none"> • To prevent pollution and maintain a clean environment 	<ul style="list-style-type: none"> • Adequate solid waste management (contain – drums / bins, sort, burn combustible materials and recycle non-combustible materials). 	<ul style="list-style-type: none"> • Scattered waste, Littering and any other unsightly waste at the site (eyesore) 	Site Manager / dedicated Waste Disposal Officer

		<ul style="list-style-type: none"> • Ensure appropriate waste collection and removal from the site and dispose at appropriate municipal waste disposal sites. 		
Oil Spills	<ul style="list-style-type: none"> • Ensure waste oil is managed appropriately and pollution is prevented at all costs 	<ul style="list-style-type: none"> • Build a concrete bunding around fuel tanks that is at least 20% larger than the tanks to allow safe working space and prevent spills from spreading. • Use of sheeting to prevent soil contamination (e.g. during vehicle servicing). • Waste oil should not be stored onsite indefinitely and should be recycled (transfer to oil recycling companies). • If an oil spill occurs, collect the contaminated soil, store in drums and dispose at appropriate waste disposal site (e.g. Municipal disposal site). 	<ul style="list-style-type: none"> • Concrete bunding at all fuel storage and handling sites • Drums or containers for oil recycling and proof of oil transfer to recycling companies 	Site Manager

SECTION E: SURFACE AND GROUND WATER

Table 4-5: Mitigation measures pertaining to water abstraction

<u>Sources of impacts:</u>				
Aspect	Objective	Mitigation Measures	Indicators for Monitoring and Compliance	Responsible Party
Water sources and abstraction	Avoid excessive abstraction of water from the river	<ul style="list-style-type: none"> • Obtain a water abstraction permit from MAWLR • Abstraction volumes to be within licensed and sustainable limits. • Determine optimum water abstraction rates. 	<ul style="list-style-type: none"> • Water abstraction volumes 	Site Manager / Proponent / Authority

SECTION F: COMMUNITY HEALTH AND SAFETY

Table 4-6: Mitigation measures pertaining to Socio Economic impacts

<p>Sources of impacts:</p> <ul style="list-style-type: none"> ✓ Lack of awareness on HIV-AIDS ✓ Teenage pregnancies ✓ Exposure to alcohol and drug use 				
Aspect	Objective	Mitigation Measures	Indicators for Monitoring and Compliance	Responsible Party
Exposure to alcohol and Drug use	Prevent negative influence of workers on children regarding alcohol abuse and drug use.	<ul style="list-style-type: none"> • Educate workers on appropriate behaviour in local communities. • Prohibit workers from supplying or influencing minors with substances. 	<ul style="list-style-type: none"> • Reports or complaints from community or schools 	Site Manager
Teenage pregnancies	To prevent sexual exposure of young girls to workers	<ul style="list-style-type: none"> • Conduct sexual health awareness (workers and the community) • Discourage pursuing young girls by workers 	<ul style="list-style-type: none"> • Awareness report, attendance register, pictures, etc 	Site Manager
HIV / AIDS	Provide HIV / AIDS awareness to employees	<ul style="list-style-type: none"> • Provide HIV / AIDS awareness at induction • Avail Condoms (e.g in toilets) 	<ul style="list-style-type: none"> • Availability of condoms at and construction site 	Site Manager

SECTION G: CULTURAL HERITAGE

Table 4-7: Mitigation measures pertaining to Cultural Heritage impacts

<u>Sources of impacts:</u>				
✓ Disregard of Cultural Heritage and artefacts				
Aspect	Objective	Mitigation Measures	Indicators for Monitoring and Compliance	Responsible Party
Heritage Resources / artefacts	Reduce the impacts of and construction and associated earthworks on heritage resources / artefacts	<ul style="list-style-type: none"> Heritage remains or artefacts discovered on site must be reported to the National Museum (+264 61 276800) or the National Forensic Laboratory (+264 61 240461) No artefacts must be removed or be interfered with prior to authorisation from the Namibian National Heritage Council (NHC) Recovery of heritage remains or artefacts discovered and removal thereof should be directed by the National Museum 	Sighting report/s of heritage resources / artefacts	Site Manager

5. REHABILITATION

5.1 Importance of Rehabilitation

Socio-economic development is very important for our livelihood and provides services, income and employment opportunities, and hence activities such as construction of a feedlot are vital and necessary for development.

However, such developmental activities should be conducted in a thoughtful and forward-looking manner. Therefore, to ensure that the land remains valuable for other land uses in the future, rehabilitation should be part and parcel of such developmental activity right from the beginning and throughout the project lifespan.

5.2 What is Rehabilitation?

Rehabilitation is the process of repairing and taking all the necessary actions to limit, minimize and mitigate the damage caused by the developmental activity, in-order to make the land suitable for other uses or to simply beautify the affected area (so that it does not become an eyesore).

Rehabilitation can also be referred to as the measures taken to repair damaged environments (example refilling of excavated pits with the overburden, re-vegetating, removal of unwanted infrastructure, cleaning up pollution etc.).

5.3 Designing a Rehabilitation Plan

A rehabilitation plan refers to a set of steps or measures to be taken in-order to ensure that negative impacts associated with the development at hand are mitigated. This however requires prior planning and integration of rehabilitation activities throughout the project lifespan. Meaning, rehabilitation measures should be taken right from the beginning of the project.

The environmental characteristics of an area where a project is located plays a vital role in designing a rehabilitation plan.

5.4 Conclusion

Construction activities should be undertaken in a responsible and environmentally friendly manner. Although balancing the demands of development and nature is not always clear cut, the importance of minimal disturbance to the natural environment is of utmost importance to safeguard the environment

SECTION H: REHABILITATION

Table 5-1: Potential impacts and Mitigation measures pertaining to Rehabilitation, animal exposure and closure

Sources of impacts:				
Impact Description	Objective	Mitigation Measures/	Indicators for Monitoring and Compliance	Responsible Party
Habitat alteration and permanent environmental scars of the and construction operations	To minimize habitat alteration and environmental scars	Limit environmental damages e.g. the overburden may be collected and piled and used for re-filling of pits Plant indigenous trees to fill the gaps for trees removed during construction	Re-filling of and construction pits with the overburden Indigenous Trees planted	Site Manager
	Landscaping	Landscaping – refers to re-shaping man-made landforms to blend in with the environment and in order to limit the damage to the natural landscape	Landscaping efforts and modification towards natural state	Site Manager
Waste discarded all over the place	Clean-up	Remove any foreign objects (including infrastructure), that is not needed at site upon project completion	Clean-up after project closure	Site Manager

6. ENVIRONMENTAL PERFORMANCE MONITORING

6.1 Environmental Performance Monitoring Plan - Overview

The purpose of this Environmental Performance Monitoring Plan is to ensure that the operational activities of the feedlot are conducted in compliance with the Environmental Management Plan (EMP), relevant environmental legislation, and best environmental practices.

Objectives:

- To ensure compliance with the EMP, Environmental Clearance Certificate (ECC), and applicable regulations.
- To assess the effectiveness of mitigation measures implemented.
- To ensure that environmental impacts are identified and managed proactively.
- To maintain accurate records for reporting and auditing purposes.

6.2 Reporting and Documentation

Bi-annual Reports will be compiled by the ECO or an appointed consultant and submitted to the Ministry of Environment, Forestry and Tourism (MEFT).

The report will include:

- Summary of monitoring results.
- Non-compliance incidents and corrective measures taken.
- Photographic evidence and data logs.
- Recommendations for improvement.

All monitoring data and reports will be stored on-site and made available during audits or inspections.

6.3 Auditing and Review

Internal audits will be conducted annually to assess the EMP implementation. The Environmental Monitoring Plan will be reviewed and updated as needed, based on audit findings, regulatory changes, or operational adjustments.

DATA SHEET

Monitoring / Environmental Audit Report

SECTION A: STAFF INDUCTION

Table 6-1: Monitoring of measures pertaining to staff Recruitment and Induction

Potential Sources of Impacts:				
Aspect	Objective	Mitigation Measures	Indicators for Monitoring and Compliance	Comment + Evidence (Pictures)
EMP availability	Availability of the EMP on site for ease of reference	<ul style="list-style-type: none"> Ensure that a copy of the EMP is kept on site and accessible to team leaders 	<ul style="list-style-type: none"> Availability of EMP on site and accessibility to team leaders 	
Staff Induction	To ensure that all staff / employees are conversant with the requirements of the EMP	<ul style="list-style-type: none"> Induction for all staff / employees on the provisions of the EMP before work commencement. Staff members appointed at a later stage should also undergo induction 	<ul style="list-style-type: none"> Induction Minutes and Attendance Register, Signed by each staff member Quarterly minutes 	
	Punitive measures for staff, to ensure compliance	<ul style="list-style-type: none"> Adopt a disciplinary system to discipline staff for non-compliance, for offences such as littering, speeding, safety risk (both to themselves and to others), not using ablution facilities, etc. 	<ul style="list-style-type: none"> Number of fines issued daily / per month 	
	Orientation of workers about security for both equipment and themselves	<ul style="list-style-type: none"> Orientate workers about security for equipment and themselves & provide 	<ul style="list-style-type: none"> Proof of orientation and 	

		contact numbers for Police and other emergency services e.g. Ambulance	emergency numbers	contact
Recruitment	<ul style="list-style-type: none"> • To ensure that all workers have employment contracts (Labour Act No. 11 of 2007) • To ensure adherence to Labour Act No. 11 of 2007 during all phases of the project 	<ul style="list-style-type: none"> • Formalize recruitment of all staff with Contracts, stating nature of employment, duration and remuneration to protect both parties and to avoid labour disputes later. 	<ul style="list-style-type: none"> • Copy of staff contracts 	

SECTION B: OCCUPATIONAL HEALTH AND SAFETY

Table 6-2: Monitoring of measures pertaining to Health and Safety

Potential Sources of Impacts:				
Aspect	Objective	Mitigation Measures	Indicators for Monitoring and Compliance	Comment + Evidence (Pictures)
General Occupational Health and Safety of the employees (injuries)	To ensure safe working conditions per Health and Safety Regulations, Government Notice 156/1997 (GG 1617)	<ul style="list-style-type: none"> Provide adequate and appropriate personal protective equipment for all workers Training on relevant aspects of occupational health and safety. 	<ul style="list-style-type: none"> Adequate protective gear for all staff (issue register) Training schedule, attendance register, report, pictures, etc 	
Alcohol abuse and Drug use	Prevent alcohol and drug use at the project site	<ul style="list-style-type: none"> Warn employees against alcohol abuse and use of prohibited substances e.g drugs 	<ul style="list-style-type: none"> Drunk / Misbehaving employees Monitor presence of prohibited substances. 	
Fire Risk / Hazard	To mitigate fire risk	<ul style="list-style-type: none"> Avail sufficient fire extinguishers and train staff on how to use them Demonstrate the use of fire extinguishers and fire hydrants, 	<ul style="list-style-type: none"> Availability of fire extinguishers and service record. Training report, attendance register, pictures, etc 	

SECTION C: POLLUTION AND WASTE MANAGEMENT

Table 6-3: Monitoring of measures pertaining to Waste Management

Potential Sources of Impacts:				
Aspect	Objective	Mitigation Measures	Indicators for Monitoring and Compliance	Comment + Evidence (Pictures)
Waste Water	<ul style="list-style-type: none"> To avoid effluent discharge into the environment 	<ul style="list-style-type: none"> Refer to regulations on effluent disposal and recommended septic tank and drainage design Be on the look-out and repair any leaking or broken sewer pipes (regardless of how small it may be perceived) 	<ul style="list-style-type: none"> No leakage of sewer pipes 	
Ablution facilities	<ul style="list-style-type: none"> To avoid open defecation, environmental pollution and washing of faecal waste into water streams 	<ul style="list-style-type: none"> Recommend Flushing toilets with provision of a containerized septic tank, honey suckled for disposal at approved oxidation ponds, or Adequate pit latrines: Ventilated (closed air-vent), slab (removable), toilet pot (closed) 	<ul style="list-style-type: none"> Ablution facilities (Flushing toilets) Containerised septic tank 	
Solid Waste	<ul style="list-style-type: none"> To prevent pollution and maintain a clean environment 	<ul style="list-style-type: none"> Adequate solid waste management (contain – drums / bins, sort, burn combustible materials and recycle non-combustible materials). Ensure appropriate waste collection and removal from the site and dispose at appropriate municipal waste disposal sites 	<ul style="list-style-type: none"> Scattered waste, Littering and any other unsightly waste at the site (eyesore) 	

Oil Spills	<ul style="list-style-type: none"> • Ensure waste oil is managed appropriately, and pollution is prevented at all costs 	<ul style="list-style-type: none"> • Build a concrete bunding around fuel tanks that is at least 20% larger than the tanks to allow safe working space and prevent spills from spreading. • Use of sheeting to prevent soil contamination (e.g. during vehicle servicing). • Waste oil should not be stored onsite indefinitely and should be recycled (transfer to oil recycling companies). • If an oil spill occurs, collect the contaminated soil, store in drums and dispose at appropriate waste disposal site (e.g. Municipal disposal site). 	<ul style="list-style-type: none"> • Concrete bunding at all fuel storage and handling sites • Drums or containers for oil recycling and proof of oil transfer to recycling companies 	
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SECTION D: SURFACE AND GROUND WATER

Table 6-4: Monitoring of measures pertaining to water abstraction

<u>Sources of impacts:</u> <input checked="" type="checkbox"/> Over-abstraction				
Aspect	Objective	Mitigation Measures	Indicators for Monitoring and Compliance	Comment + Evidence (Pictures)
Water abstraction	Determine water sources (boreholes, oshanas, pipeline) and avoid over-abstraction	<ul style="list-style-type: none"> Abstraction volumes to be within licensed and sustainable limits. Conduct borehole testing to determine borehole yield and optimum water abstraction rates. Allow borehole resting for recharge 	<ul style="list-style-type: none"> Water abstraction volumes 	

SECTION E: COMMUNITY SAFETY

Table 6-5: Monitoring of measures pertaining to community safety

Sources of impacts: <ul style="list-style-type: none"> ✓ Lack of awareness on HIV-AIDS ✓ Teenage pregnancies ✓ Exposure to alcohol and drug use 				
Aspect	Objective	Mitigation Measures / Management Actions	Indicators for Monitoring and Compliance	Comment + Evidence (Pictures)
Exposure to alcohol and Drug use	Prevent negative influence of workers on children regarding alcohol abuse and drug use.	<ul style="list-style-type: none"> • Educate workers on appropriate behaviour in local communities. • Prohibit workers from supplying or influencing minors with substances. 	<ul style="list-style-type: none"> • Reports or complaints from community or schools 	
Teenage pregnancies	To prevent sexual exposure of young girls to workers	<ul style="list-style-type: none"> • Conduct sexual health awareness (workers and the community) • Discourage pursuing young girls by workers 	<ul style="list-style-type: none"> • Awareness report, attendance register, pictures, etc 	
HIV / AIDS	Provide HIV / AIDS awareness to employees	<ul style="list-style-type: none"> • Provide HIV / AIDS awareness at induction • Avail Condoms (e.g in toilets) 	<ul style="list-style-type: none"> • Availability of condoms at and construction site 	

7. CONCLUSION

7.1 EMP requirements and Procedures

The aim of the EMP is to ensure legal compliance to prevent environmental fatal flaws. Various best practice and mitigation measures have been identified to avoid and reduce effects as far as reasonably practicable across the proposed project, as well as ensure the environment is protected and unforeseen effects are avoided.

On condition that mitigation measures specified in this EMP are fully implemented, an Environmental Clearance Certificate (ECC) is recommended.

However, Non-compliance is punishable.

The key role-players are defined under section 4 should:

- **Read** the ESMP (particularly the Project Manager) and ensure that they are fully conversant with provisions of the EMP,
- If need be, **Ask for clarity** from the Environmental Assessment Practitioner (EAP), Environmental Compliance Officer (ECO) or relevant authority,
- Ensure implementation of the recommended mitigation measures, and
- Communicate defaults / challenges to the ECO as soon as possible.

The ECO should monitor (conduct periodic and unannounced EMP audits) in-order to ensure compliance against the recommended mitigation measures.

7.2 Compliance to the EMP

Once approved by the Environmental Commissioner, EMP become binding to the proponent, and all contractors / sub-contractors. This implies that each and every entity that may have any kind of engagement or involved in / with the proposed project activities ought to familiarise themselves with the mitigations measures as outlined in the ESMP, as these as part of the license conditions.

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