

**ENVIRONMENTAL & SOCIAL IMPACT
ASSESSMENT FOR THE PROPOSED REZONING OF
PORTION 176 KEETMANSHOOP TOWN AND
TOWNLANDS NO.150 FROM UNDETERMINED TO
INDUSTRIAL 1 WITH A BULK OF 0.5, //KHARAS
REGION - NAMIBIA**

ENVIRONMENTAL MANAGEMENT PLAN (EMP)

JUNE 2025

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PLAN AFRICA CONSULTING CC



DOCUMENT INFORMATION

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REPORT TITLE	ENVIRONMENTAL MANAGEMENT PLAN: (EMP)
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ACRONYMS

TERMS	DEFINITION
BID	Background Information Document
DEFRA	The Department for Environment, Food and Rural Affairs
EAP	Environmental Assessment Practitioner
ECC	Environmental Clearance Certificate
EIA	Environmental Impact Assessment
ESA	Environmental Scoping Assessment
ESIA	Environmental and Social Impact Assessment
EMP	Environmental Management Plan
FLTS	Flexible Land Tenure System
I&APs	Interested and Affected Parties
MAWLR	Ministry of Agriculture, Water and Land Reform
MEFT: DEAF	Ministry of Environment, Forestry and Tourism's Department of Environmental Affairs and Forestry
NHC	National Heritage Council
N(EMA)	Namibia Environmental Management Act
PRP	Pit Rehabilitation Plan
ToR	Terms of Reference
UNFCCC	United Nations Framework Convention on Climate Change

1. CHAPTER ONE: BACKGROUND INFORMATION

1.1. INTRODUCTION

The proponent, Keetmanshoop Municipality intends to apply for the Rezoning of Portion 176 Keetmanshoop Town & Townlands No.150 from “Undetermined” to “Industrial”. The proposed zoning will enable the owner to sell the portion as an industrial zoned portion, the proposed industrial zoning is in line with the Keetmanshoop Zoning Scheme.

In respect of the proposed development, the proponent has appointed Plan Africa Consulting CC to undertake an Environmental and Social Impact Assessment (ESIA) and develop an Environmental Management Plan (EMP) for the proposed development and also apply for an Environmental Clearance Certificate (ECC) to the Ministry of Environment, Forestry and Tourism (MEFT): Directorate of Environmental Affairs (DEA).

In terms of the Environmental Management Act of 2007 (Schedule 5.1) and its regulations (GN No. 30 of 2012), the Rezoning of land from “undetermined” to “Industrial use” cannot be undertaken without an Environmental and Social Impact Assessment (ESIA) being conducted and Environmental Clearance Certificate (ECC) is obtained. The ESIA and EMP is focused on the rezoning of Portion 176 Keetmanshoop Town & Townlands No.150 from ‘Undetermined’ to ‘Industrial 1’ with a bulk of 0.5. As such, this document forms part of the application to be made to the DEA’s office for an ECC for the proposed rezoning.

1.2. PROJECTION LOCATION

Portion 176 is located along the B1 Road enroute to South Africa and approximately 3km from the intersection (circle) with the B4 Road, northwest of *Skaap rivier* and south of Keetmanshoop. The intention is to use the portion for industrial purposes. The portion in question is zoned 'undetermined' according to the Keetmanshoop Zoning Scheme and measures approximately 40018m² in extent. The coordinates are (Lat: -26.617265/Long:18.177271).



Figure 1: Locality of Portion 176 Keetmanshoop Town & Townlands No.150

1.3. POLICIES, LEGAL & REGULATORY FRAMEWORKS

Table 1: Policies, Legal and Administrative Regulations

Aspect	Legislation	Relevant Provisions	Relevance to the Project
The Constitution	Namibian Constitution First Amendment Act 34 of 1998	- Article 16(1) guarantees all persons the right to property. It therefore provides everyone a right to acquire, own and dispose of property, alone or in association with others and to bequeath such property. - “The State shall actively promote and maintain the welfare of the people by adopting policies that are aimed at maintaining ecosystems, essential ecological processes and the biological diversity of Namibia. It further promotes the sustainable utilization of living natural resources basis for the benefit of all Namibians, both present and future.” (Article 95(I)).	- The project will enable the full execution of right to practice any profession, or carry on any occupation, trade or business by availing necessary provisions such as practicing any profession, or carry on any occupation, trade or business in the country. - Through implementation of the environmental management plan, the proponent will ensure conformity to the constitution in terms of environmental management and sustainability.
National Development Plans		- Namibia’s overall Development ambitions are articulated in the National Vision 2030. At the operational level, five-yearly national development plans (NDP’s) are prepared in extensive consultations led by the National Planning Commission in the Office of the President. The Government has so far launched a 4th NDP focusing on high and sustained economic growth, increased income equality Employment creation.	- The proposed project will propel NDP4 targets in logistics and commodities market. Adding on, this will create employment which will work towards the NDP and Vision 2030.
Archaeology	National Heritage Act 27 of 2004	- Section 48(1) states that “A person may apply to the Namibian Heritage Council (NHC) for a permit to carry out works or activities in relation to a protected place or protected object”	- Any heritage resources discovered would require a permit from the NHC for relocation.

	National Monuments Act of Namibia (No. 28 of 1969) as amended until 1979	- “No person shall destroy, damage, excavate, alter, remove from its original site or export from Namibia: - Meteorites, fossils, petroglyphs, ornamental infrastructure graves, caves, rock shelters, middens, shells that came into existence before the year 1900 AD; or any other archaeological or paleontological finds	- The proposed site of development is not within any known monument sites, both movable and immovable as specified in the Act, however in finding any materials specified in the Act, contractors on site will take the required route and notify the relevant commission.
Environmental	Environmental Management Act 7 of 2007	- Requires that projects with significant environmental impacts are subject to an environmental assessment process (Section 27). - Requires for adequate public participation during the environmental assessment process for interested and affected parties to voice their opinions about a project (Section 2(b-c)). - According to Section 5(4) a person may not discard waste as defined in Section 5(1)(b) in any way other than at a disposal site declared by the Minister of Environment and Tourism or in a manner prescribed by the Minister. - Details principles which are to guide all EIAs	- This Act and its regulations should inform and guide this EIA process.
	EIA Regulations GN 57/2007 (GG 3812)	- Details requirements for public consultation within a given environmental assessment process (GN No 30 S21). - Details the requirements for what should be included in a Scoping Report (GN No 30 S8) an EIA report (GN No 30 S15).	- This Act and its regulations should inform and guide this EIA process.
	Pollution and Waste Management Bill (draft)	- This bill defines pollution and the different types of pollution. It also points out how the Government intends to regulate the different types of pollution to maintain a clean and safe environment. - The bill also describes how waste should be managed to reduce environmental pollution. Failure to comply with	- The project should be executed in harmony with the requirements of the act to reduce negative impacts on the surrounding environs from waste during construction or operation. Keetmanshoop waste management

		the requirements considered an offence and is punishable.	by-laws will be abide to during construction and operation.
	Soil Conservation Act 76 of 1969	- This acts makes provision for combating and for the prevention of soil erosion, it promotes the conservation, protection and improvement of the soil, vegetation, sources and resources of the Republic of Namibia.	The Project impact on soil will rather be localized, however the Act should provide for guidelines of operation during construction to prevent soil erosion and contamination during operation.
	National Biodiversity Strategy and Action Plan (NBSAP2)	- The action plan was operationalized in a bid to make aware the critical importance of biodiversity conservation in Namibia, putting together management of matters to do with ecosystems protection, biosafety, and biosystematics protection on both terrestrial and aquatic systems.	- Forming part of the EIA of and EMP for this Project, the proponent will consider all associated impacts, both acute and long term, and will propose methods and ways to sustain the local biodiversity.
Forestry	Forest Act 12 of 2001	- Tree species and any vegetation within 100m from a watercourse may not be removed without a permit (S22(1)) - Provision for the protection of various plant species.	- The clearing of vegetation is prohibited (subject to a permit) 100m either side of a river. Certain tree species occurring in the area are protected under this Act. Permits must be obtained from MAWF in accordance with the Act. However, on site there are no trees that require clearing permit.

Water	Water Act 54 of 1956	- The Water Resources Management Act 24 of 2004 is presently without regulations; therefore, the Water Act No 54 of 1956 is still in force: - A permit application in terms of Sections 21(1) and 21(2) of the Water Act is required for the disposal of industrial or domestic wastewater and effluent. - Prohibits the pollution of underground and surface water bodies (S23(1)). - Liability of clean-up costs after closure/ abandonment of an activity (S23(2)). - Protection from surface and underground water pollution	- The protection of ground and surface water resources should guide development's layout plans.
Health and Safety	Labour Act (No 11 of 2007) in conjunction with Regulation 156, 'Regulations Relating to the Health and Safety of Employees at work'.	- 135 (f): "the steps to be taken by the owners of premises used or intended for use as factories or places where machinery is used, or by occupiers of such premises or by users of machinery about the structure of such buildings of otherwise to prevent or extinguish fires, and to ensure the safety in the event of fire, of persons in such building;" (Ministry of Labour and Social Welfare). - This act emphasizes and regulates basic terms and conditions of employment, it guarantees prospective health, safety and welfare of employees and protects employees from unfair labour practices.	The proponent will employ several people from the local and shall ensure securing a safe environment and preserving the health and welfare of employees at work. This will include applying appropriate hazard management plans and enforcing Occupational Health and Safety (OHS) enforcement by contractors.
	Public Health and Environmental Act, 2015	- Under this act, in section 119: "No person shall cause a nuisance or shall suffer to exist on any land or premises owned or occupied by him or of which he is in charge any nuisance or other condition liable to be injurious or dangerous to health."	The butchery operations will ensure compliance to the terms of the Act.

Services and Infrastructure	Road Ordinance 1972 (Ordinance 17 of 1972)	- Width of proclaimed roads and road reserve boundaries (S3.1) - Control of traffic during construction activities on trunk and main roads (S27.1) - Infringements and obstructions on and interference with proclaimed roads. (S37.1) - Distance from proclaimed roads at which fences are erected (S38)	- Although the project is a major boost for the suburb and the commodities market, the proponent needs to ensure that the development do not affect the major roads within their vicinity during construction and operation phases.
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2. CHAPTER TWO: ENVIRONMENTAL MANAGEMENT PLAN (EMP)

2.1. INTRODUCTION

In line with the Namibian Environmental Management legislation and International best practices the proponent will implement an Environmental Management Plan (EMP) to prevent, minimize and mitigate negative impacts. The EMP is developed by Plan Africa Consulting cc to address all the identified expected impacts. The EMP will be monitored and updated on a continuous basis with the aim for continuous improvement to addressing impacts.

The EMP stipulates the management of environmental programs in a systematic, planned and documented manner. This EMP includes the organizational structure, planning and monitoring for environmental protection at the proposed development site and other areas of its influence. The aim is to ensure that the facility maintains adequately controlled environmental management over the project operations to:

- To prevent negative impacts where possible;
- Reduce or minimize the extent of impact during project life cycle;
- Prevent long term environmental degradation.

2.2. EMP ADMINISTRATION

There is a strong need to clearly outline the roles and responsibilities of all stakeholders to ensure that the EMP is fully implemented. There is also a need for the proponent to appoint an overall responsible person (project manager) to ensure the successful implementation of the EMP as highlighted in Table 2.

Table 2: Roles and Responsibilities in Implementation

ROLE	RESPONSIBILITIES
Proponent	Responsible to enforce EMP implementation to employees and contractors
Environmental Control Officer	• Implement, review and update the EMP. • Ensure all reporting and monitoring required under EMP is undertaken, documented and distributed as needed • Conduct environmental site training (toolbox talks) and inductions with the support of an environmental consultant. • Conducts environmental audit at work site with the support of environmental consultant.

	• Close out all non-conformances. Ensure materials being used on site are environmentally friendly and safe.
The Department of Environmental Affairs	• Review the EMP and any amendments to the EMP. • Review reports of environmental issues and non-conformances as issued. • Review and approve environmental reports submitted as part of EMP implementation
Site Engineers	• Control and monitor actions required by the EMP. • Report all environmental issues to HSE Manager. • Ensure documented procedures are followed and records kept on site. • Ensure any complaints are passed onto the management within 24 hours of receiving the complaint.
Employees	• Follow requirements as directed by site engineers. • Report any potential environmental issues to site engineer/project manager, indicating spilt oil, excess waste, excessive dust generation, dirty water running off the site and other possible non-conformances

2.3. EMP MANAGEMENT ACTIONS

The management actions aim to avoid potential impacts where possible. Where impacts cannot be avoided, management actions are outlined in order to minimize the significant impacts.

The tables below outline the specific management actions which need to be undertaken during the planning, design and operational phase of the development to ensure that the site activities are compliant to environmental regulations.

2.3.1. Measures during planning and design phase

Table 3: Planning & Design Phase Management Actions

Environmental Issue/Impacts	Mitigation Measures	Roles and Responsibilities Implementation
Legal compliance	- Approval should be approved from the URPB for the intended Rezoning. - The Building Plan should be approved by the Keetmanshoop Municipality	Proponent
Public Safety	- Follow the General Health Safety Regulations GN 121 of 14 October 1969 as amended. - General safety regulations provided by the Municipality should be adhered to - Provide and maintain pedestrian crossing across the street	Proponent
Impact of surface drainage	Do not block drainage system and keep sand and waste away	Contractor
Impact on water	Use water sparingly	Contractor
Impact on the soil	Contain all wastewater and avoid any seepage of contaminates into the soil	Contractor
The aesthetic view of the area	- The site must be clear of litter. - All waste must be removed and disposed of to the landfill site. - Plant ornamental vegetation to enhance the aesthetic view. - Provide routine maintenance to the property	Contractor
Traffic impacts	Ensure road signs and markings at the intersection to the existing roads.	Keetmanshoop Municipality
Waste management	- Provide sufficient refuse bins or skips. - All construction waste should be collected and disposed of at Keetmanshoop landfill site	Contractor

2.3.2. Measures during Operation phase

Table 4: Mitigation measures during Operation phase

Environmental Issue/Impacts	Mitigation Measures	Roles and Responsibilities Implementation
Legal compliance	- The property use should be in line with the uses under category “Business as specified in the” Keetmanshoop Town Planning Scheme - The proponent should obtain Fitness Certificate from the Keetmanshoop Municipality	Proponent
Public Safety	- Follow the General Health Safety Regulations GN 121 of 14 October 1969 as amended. - General safety regulations provided by the Municipality should be adhered to. - Provide and maintain pedestrian crossing across the street	Proponent
Impact of surface drainage	Provide routine maintenance to drainage channels	Proponent
Impact on water	- Encourage tenants to use water sparingly. - Install 1 water saving showers	Proponent
Impact on the soil	- Provide regular maintenance to sewage lines, prevent overflows and - Avoid any seepage of contaminants into the soil - Provide a stormwater drainage system around the site and avoid soil erosion	Proponent
The aesthetic view of the area	- The site must be clear of litter. - All waste must be removed and disposed of to the landfill site. - Plant ornamental vegetation to enhance the aesthetic view. - Provide routine maintenance to the property	Proponent
Traffic impacts	Ensure road signs and markings at the intersection to the existing roads.	Keetmanshoop Municipality
Waste management	- Provide sufficient refuse bins or skips - Ensure regular picking up of waste by self or Municipality	Proponent

2.4. ENVIRONMENTAL MONITORING PLAN

Monitoring is important for identifying the success of mitigation measures formulated for the significant impacts identified. Monitoring of activities will identify impacts that have not been foreseen and give enough time to analyse the situation and formulate measures to minimise impacts. Survey records and results must be maintained for these monitoring and inspections, highlighting any problems and the measures taken to address it.

- Prior to site preparation and construction activities, the main contractor should present an environmental monitoring plan (including, *inter alia*, location of construction camp and toilet facilities, location of material storage areas, solid waste management plan, dust control measures, activity schedule, etc.) for review and approval by the Environmental Consultant.
- The developer should present a landscape plan and the trees/vegetation earmarked for protection should be flagged and hoarded by the contractor.

The entity selected to carry out environmental monitoring of the construction works should then prepare an environmental monitoring program based on the above, the requirements of the EIA, and conditions of the development permit. The major elements of the environmental impact monitoring program to be implemented during the construction phase of the project are as follows:

- i. Site clearance to ensure that trees marked for protection are left untouched and that large areas of soil are not left exposed and uncovered for extended periods of time.
- ii. Site drainage and surface runoff, especially during and shortly after major rainfall events, to ensure there is no flooding, ponding and runoff of surface water. Compliance of construction works with site management and landscape plans.
- iii. Ensure transportation of earth materials is done by covered trucks and from approved sites.
- iv. The contractor must immediately and completely clean up spills of materials in public areas.
- v. Solid waste disposal practices to ensure appropriate on-site management and final disposal at approved dumpsite.

3. CHAPTER THREE: CONCLUSION AND RECOMMENDATION

The environmental impact assessment process for the proposed rezoning was conducted in accordance to the Environmental Management Act 2007 and EMA Regulation 2012. Further consideration was given to relevant legislation throughout the entire process to ensure a successful assessment process.

Impacts likely to occur during project phases (construction and operation) were assessed depicting a positive outlook despite limited details of the magnitude of the proposed development. Based on the assessment, the overall project is less damaging to the environment demonstrating job creation opportunities, generation of revenue and community development. Impacts with negative effects were also identified and summarized in a form of environmental management plan to ensure sustainable implementation.

Services are already close to the portion at the adjacent portions it requires extension to the site. Additionally, the site has minimal vegetation. It is mostly covered by shrubs. It is important that the proponent observes and maintain accountability to both socio-economic and environmental sensitive activities from the project, such that the project is harmonized with policy, regulations, administrative frameworks and social interface with the public as proposed in the environmental management plan. Failure to observe these measures will significantly affect the local environment and lead to non-compliance. Therefore, implementation environmental protection measures should be executed in consultation with the key stakeholders.

It is therefore recommended that the Environmental Commissioner do consider the findings and recommendations of this Scoping process with mitigation measures as outlined herein and in the Environmental Management Plan and subsequently, consider issuing an Environmental Clearance Certificate to authorize the proposed Rezoning of Portion 176 Keetmanshoop Town & Townlands No.150 from “Undetermined” to “Industrial 1” with a bulk of 0.5

4. LIST OF REFERENCES

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