

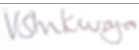


PROJECT STATUS

Title	Environmental Management Plan for the: Subdivision, Consolidation and Street creation on the Remainder of Portion 163 (a portion of Portion 14) of the Farm Nubuamis No. 37.		
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ABBREVIATIONS

AIDS	Acquired Immuno-Deficiency Syndrome
EA	Environmental Assessment
ECC	Environmental Clearance Certificate
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
EMA	Environmental Management Act
EMP	Environmental Management Plan
GG	Government Gazette
GIS	Geographic Information System
GN	Government Notice
GPS	Global Positioning System
HIV	Human Immuno-deficiency Virus
HOA	Homeowners Association
I&APs	Interested and Affected Parties
PR	Proponent's Representative
NHCN	National Heritage Council of Namibia
Reg.	Regulation
S	Section
SPC	Stubenrauch Planning Consultants
TB	Tuberculosis

1 INTRODUCTION

Twinhead CC hereinafter referred to as the proponent intends to undertake the following activities:

- **Subdivision of Portion 163 (a portion of Portion 14) of the Farm Nubuamis No. 37 into 3 (A,B & C) portions and the Remainder;**
- **Consolidation of Portion C/163 (a portion of Portion 14) of the Farm Nubuamis No. 37 with Portion 158 (a portion of Portion 14) of the Farm Nubuamis No. 37, into Consolidated Portion “X”; and**
- **Registration of a 20m Right of Way Servitude over the Remainder of Portion 163 (A Portion of Portion 14) of the Farm Nubuamis No. 37 in favor of Portions A, B and C of the Farm Nubuamis No. 37.**

The above development triggers listed activities in terms of the Environmental Management Act (No. 7 of 2007) and Environmental Impact Assessment Regulations (Government Notice No. 30 of 2012).

An Environmental Management Plan (EMP) is one of the most important outputs of the EIA process as it synthesises all the proposed mitigation and monitoring actions, set to a timeline and with specific assigned responsibilities. This EMP details the mitigation and monitoring actions to be implemented during the following phases of these developments:

- Planning and Design – the period prior to construction during which preliminary legislative and administrative arrangements, necessary for the preparation of erven, are made and engineering designs are carried out. The preparation of construction tender documents forms part of this phase;
- Construction – the period during which the proponent, having dealt with the necessary legislative and administrative arrangements, appoints a contractor for the construction of the proposed development as well as any other construction process(s) within the development areas;
- Operation and Maintenance – the period during which the proposed development will be fully functional and maintained.

The decommissioning of these developments is not envisaged; however, in the event that this should be considered, some recommendations have been outlined in **Table 4-5**.

2 PROPOSED DEVELOPMENT

2.1 Locality

Portion 163 (a portion of Portion 14) of the Farm Nubuamisi No.37 and Portion 158 (a portion of Portion 14) No. 37, which are found in the “Industrial” area of Brakwater are located adjacent to one another along the B1 road towards Okahandja, just outside of the Windhoek town, as depicted in **Figure 1** below.

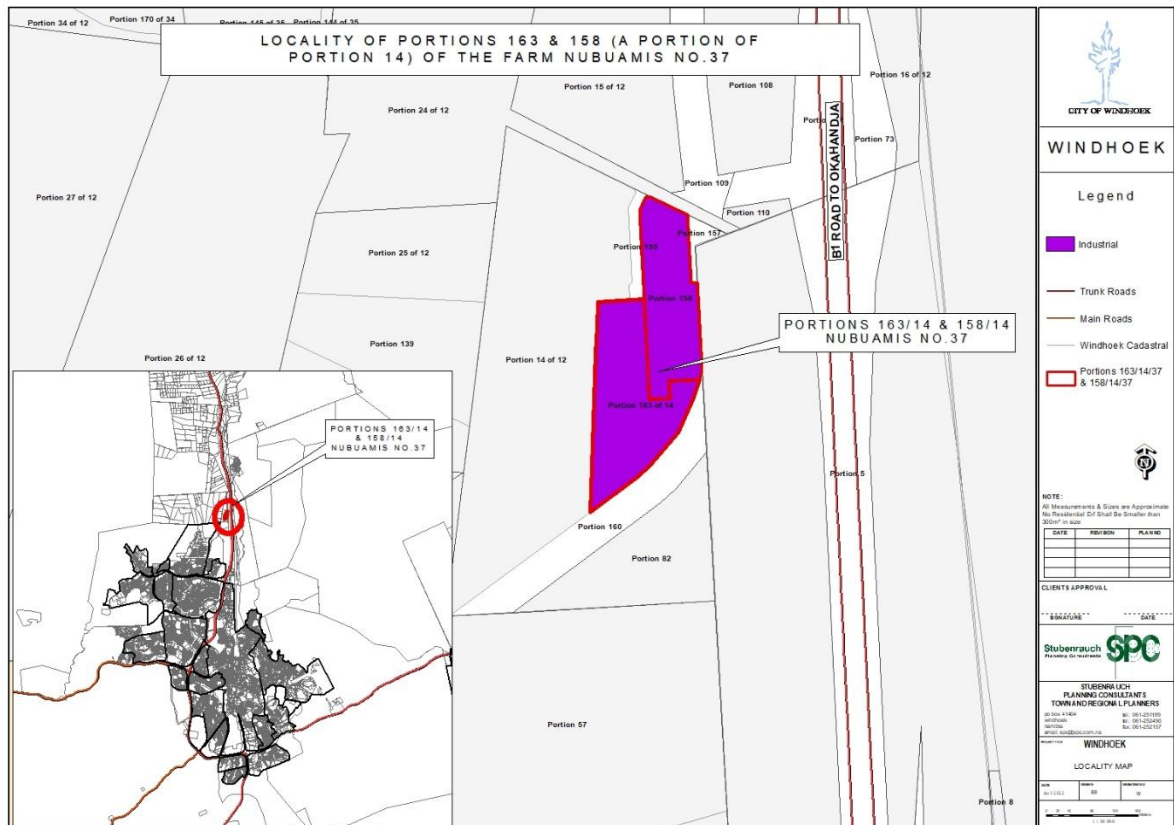


Figure 1: Locality map of Portion 163 and 158 (a Portion of Portion 14) of the Farm Nubuamisi No.37

2.2 Development Description

Industrial land uses are typically located on the outskirts of urban areas to provide sufficient space for operations while minimizing disturbances to residents. With limited industrial land remaining in Windhoek's built-up areas—such as Prosperita, Southern Industrial, Lafrenz, and Northern Industrial—investors are increasingly turning to Brakwater, which offers ample space for activities like construction, assembly, and vehicle repair.

Portion 163 (a portion of Portion 14) of Farm Nubuamis No. 37 in Brakwater, zoned for industrial use, is currently leased by several occupants who wish to purchase the areas they occupy. To accommodate this, the property owner proposes subdividing the land into smaller industrial portions, allowing tenants to secure ownership, continue their operations, and invest in site improvements.

The application also seeks to rectify an existing encroachment onto Portion 158 by creating and rezoning Portion C/163 to "Industrial," which will then be consolidated with Portion 158. Additionally, a 20m Right of Way Servitude will be registered to formalize the existing access road used by occupants.

This proposal promotes orderly land use, tenure security, and sustainable industrial development in Brakwater while resolving boundary issues and improving site accessibility. Therefore, it is the proponent's intention to undertake the following activities:

Subdivision of Portion 163 (a portion of Portion 14) of the Farm Nubuamis No. 37 into 3 (A,B & C) portions and the Remainder;

Consolidation of Portion C/163 (a portion of Portion 14) of the Farm Nubuamis No. 37 with Portion 158 (a portion of Portion 14) of the Farm Nubuamis No. 37, into Consolidated Portion "X"; and

Registration of a 20m Right of Way Servitude over the Remainder of Portion 163 (A Portion of Portion 14) of the Farm Nubuamis No. 37 in favor of Portions A, B and C of the Farm Nubuamis No. 37.

2.2.1 Subdivision of Portion 163 (a portion of Portion 14) of the Farm Nubuamis No. 37 into 3 (A,B & C) portions and the Remainder;

Portion 163 (a portion of Portion 14) of the Farm Nubuamis No. 37 is to be subdivided into 4 Portions and the Remainder as depicted in **Table 2-1** below.

Proposed Portion C/163 (a portion of Portion 14) of the Farm Nubuamis has been created for consolidation with Portion 158 (a portion of Portion 14) of the Farm Nubuamis No. 37 in order to rectify the encroachment as seen in **Figure 2 & 3**.

Table 2-1: Subdivision of Portion 163 (a portion of Portion 14) of the Farm Nubuamisi No. 37

Portion No.	Current Zoning	Proposed Zoning	Size (\pm ha)
A/163	Industrial with a bulk of 0.4	Industrial with a bulk of 0.4	0.3044
B/163	Industrial with a bulk of 0.4	Industrial with a bulk of 0.4	0.3036
C/163	Industrial with a bulk of 0.4	Industrial with a bulk of 0.4	0.1814
RE/163	Industrial with a bulk of 0.4	Industrial with a bulk of 0.4	2.9639

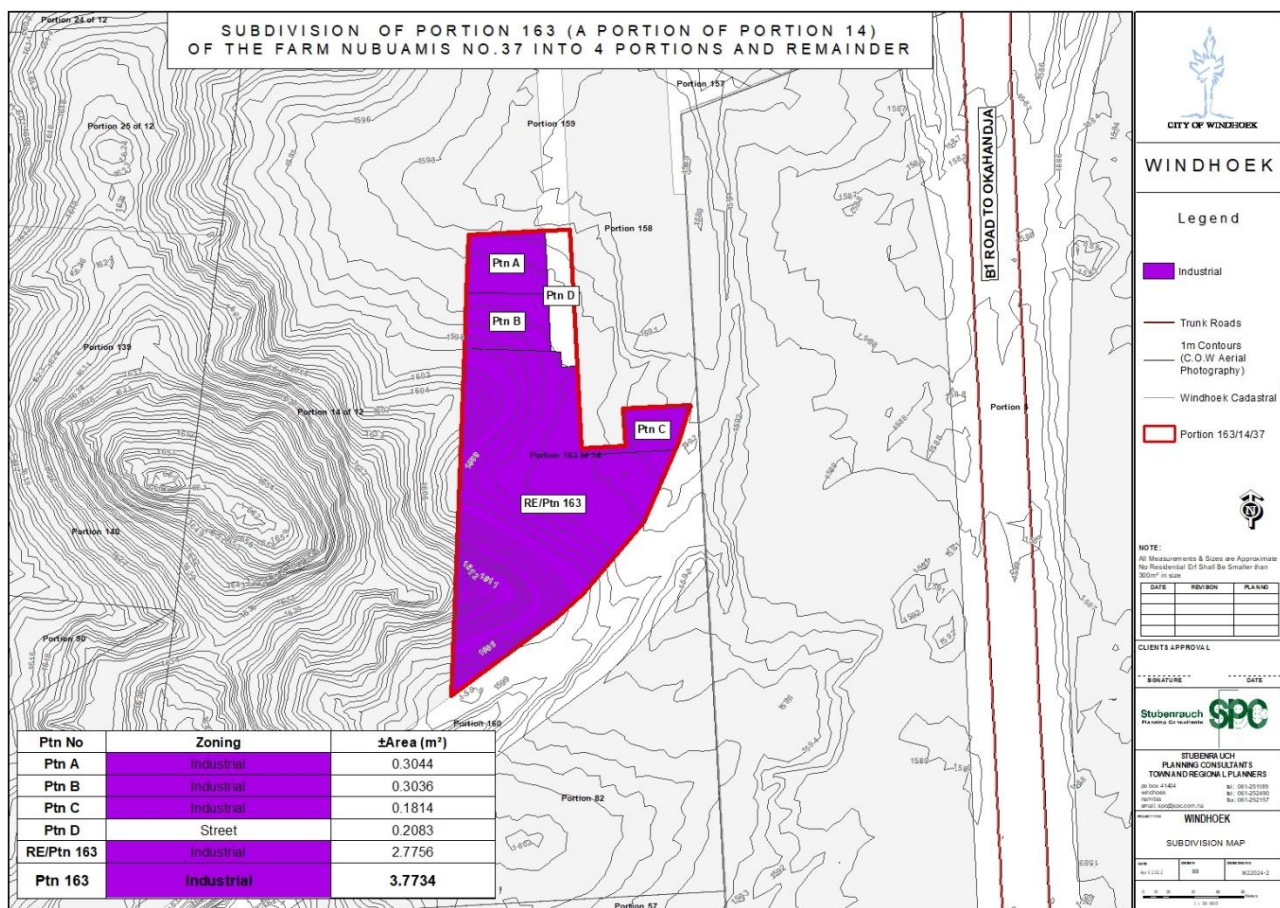


Figure 2: Subdivision of Portion 163 (a portion of Portion 14) of the Farm Nubuamisi No. 37 into 3 (A, B & C) portions and the Remainder

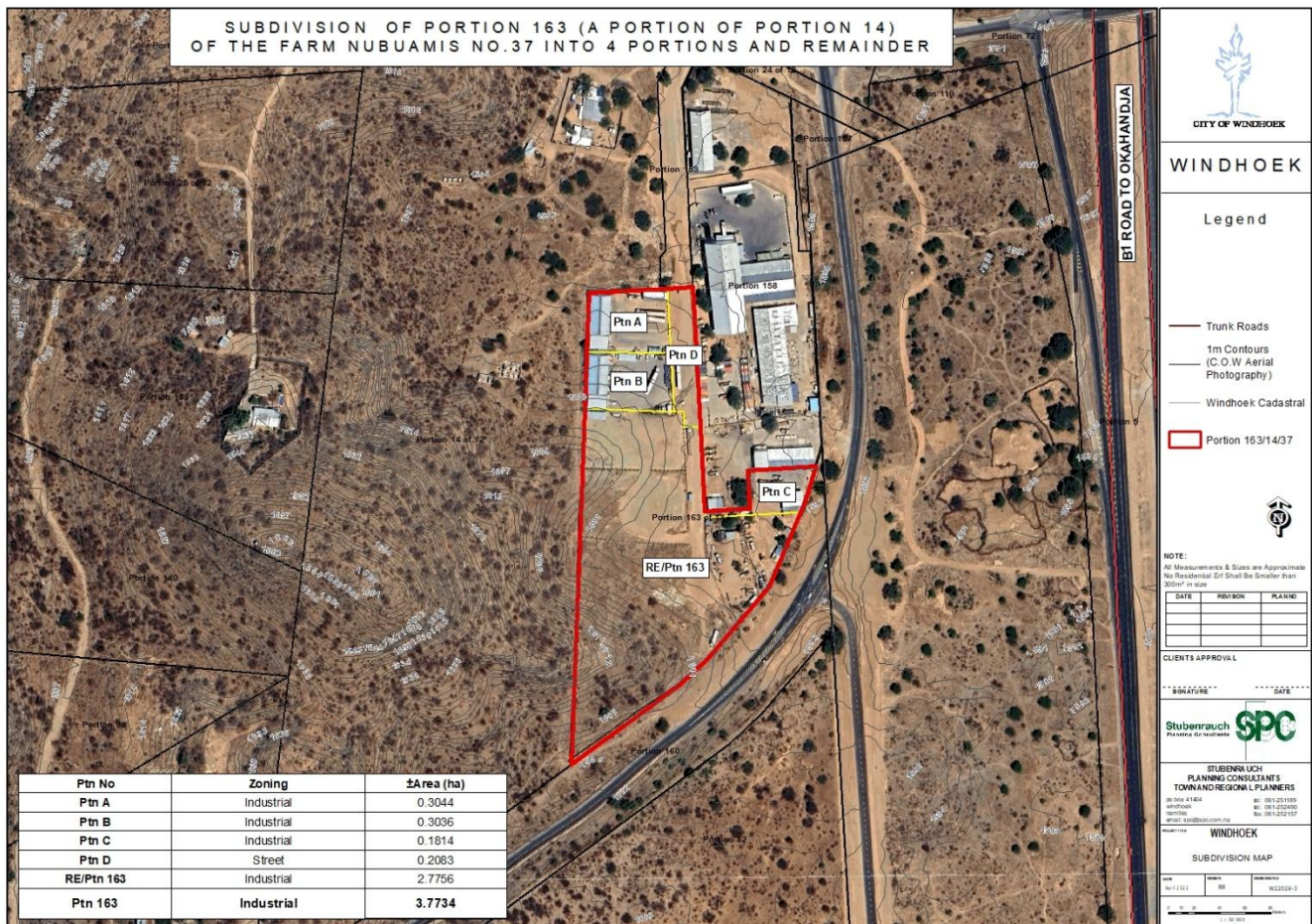


Figure 3: Aerial photo of the Subdivision of Portion 163 (a portion of Portion 14) of the Farm Nubuamis No. 37 into 3 (A, B & C) portions and the Remainder

2.2.2 Consolidation of Portion C/163 (a portion of Portion 14) of Portion 163 (a portion of Portion 14) of the Farm Nubuamis No. 37 with Portion 158 (a portion of Portion 14) of the Farm Nubuamis No. 37 into "Consolidated Portion X"

In order to rectify the above-mentioned encroachment, proposed Portion C/163 (a portion of Portion 14) of Portion 163 (a portion of portion 14) of the Farm Nubuamis No. 37 must be consolidated on with Portion 158 (a portion of Portion 14) of the Farm Nubuamis No. 37 as seen on **Figure 4** and **Table 2** below.

Table 2: Consolidation Table

Erf No.	Current Zoning	Proposed Zoning	Size (±ha)
C/163	Industrial with a bulk of 0.4	Industrial with a bulk of 0.4	0.1814
Portion 158	Industrial with a bulk of 0.4	Industrial with a bulk of 0.4	2. 832
Consolidated Portion "X"		Industrial with a bulk of 0.4	3.0134

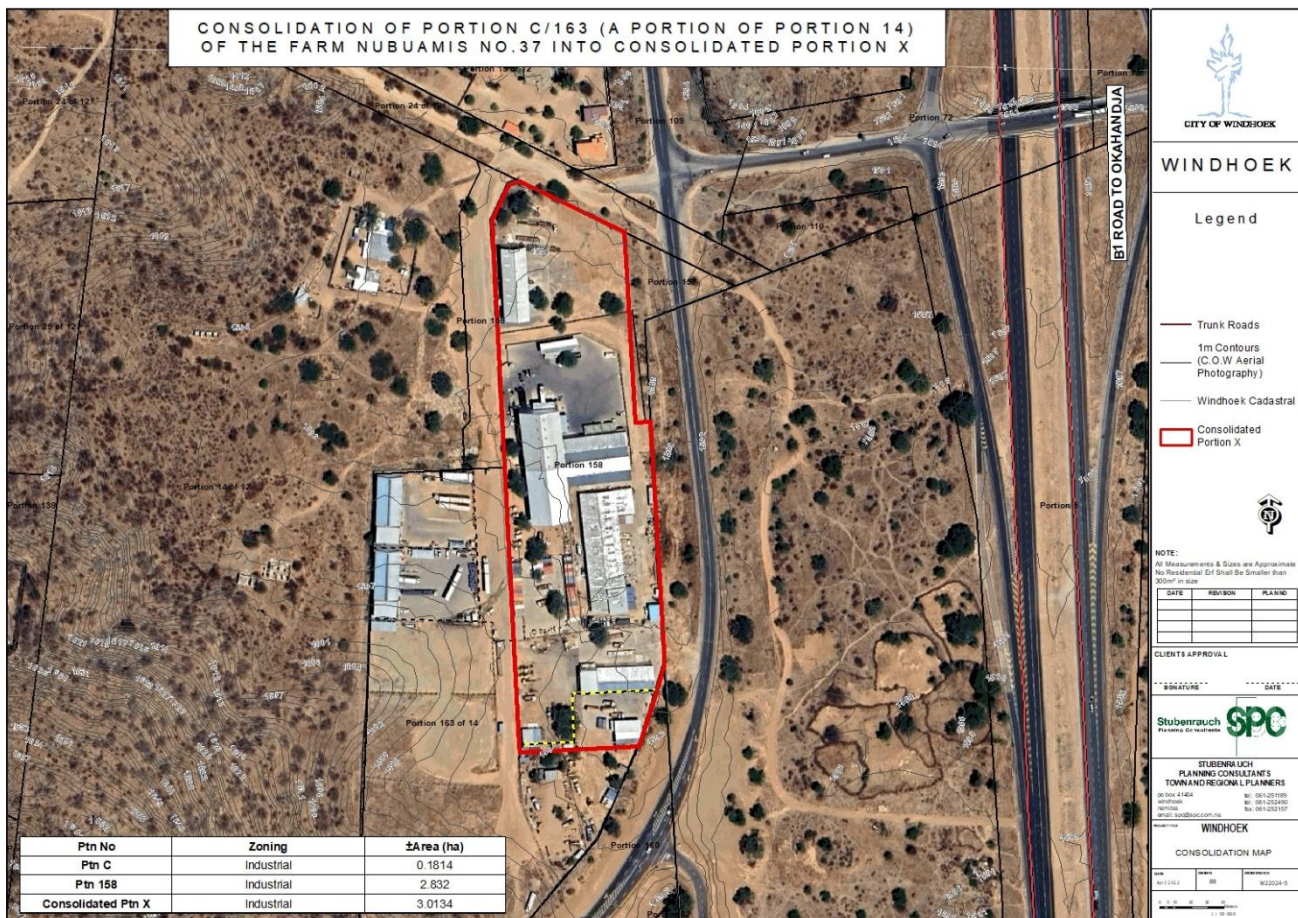


Figure 4: Consolidation of Portion C/163 (a Portion of Portion 14) of the Farm Nubuamisi No.37 into consolidated Portion X

2.2.3 Registration of a 20m Right of Way Servitude over the Remainder of Portion 163 (A Portion of Portion 14) of the Farm Nubuamisi No. 37 in favor of Portions A, B and C of the Farm Nubuamisi No. 37

The proposed 20m Right of Way servitude will formalize the existing informal road, providing access to the newly created portions resulting from the subdivision of Portion 163 (a portion of Portion 14) of the Farm Nubuamisi No. 37.

2.2.4 Engineering Services

2.2.4.1 Water, Electricity, Stormwater and Sewer

Portion 163 (a portion of Portion 14) of the Farm Nubuamisi No. 37 and Portion 158 (a portion of Portion 14) of the Farm Nubuamisi No. 37 are fully connected to the municipal service network of the Municipal Council of Windhoek.

The newly created erven will retain these connections, and any additional connection are to be done in accordance with the engineering standards and requirements of Municipal Council of Windhoek.

2.2.4.2 Access Provision

Access to Portion 163 (a portion of Portion 14) of Farm Nubuamis No. 37 and Portion 158 (a portion of Portion 14) of the Farm Nubuamis No. 37 is obtained from the internal road network of Windhoek.

Access to the newly created portions will be obtained from the proposed 20m Right of Way Servitude.

3 ROLES AND RESPONSIBILITIES

The proponent (Twinhead CC) is ultimately responsible for the implementation of the EMP, from the planning and design phase to the decommissioning phase (if these developments are in future decommissioned) of these developments. The proponent will delegate this responsibility as the project progresses through its life cycle. The delegated responsibility for the effective implementation of this EMP will rest on the following key individuals:

- Proponent's Representative;
- Environmental Control Officer; and
- Contractor (Construction and Operations and Maintenance).

3.1 PROPONENTS' REPRESENTATIVE

The Proponent should assign the responsibility of managing all aspects of these developments for all development phases (including all contracts for work outsourced) to a designated member of staff, referred to in this EMP as the Proponent's Representative (PR). The PR's responsibilities are as follows:

Table 3-1 Responsibilities of PR

Responsibility	Project Phase
Making sure that the necessary approvals and permissions laid out in Table 4-1 are obtained/adhered to.	<ul style="list-style-type: none"> • Throughout the lifecycle of these developments
Making sure that the relevant provisions detailed in Table 4-2 are addressed during planning and design phase.	<ul style="list-style-type: none"> • Planning and design phase

Responsibility	Project Phase
Monitoring the implementation of the EMP monthly.	<ul style="list-style-type: none"> • Construction • Operation and maintenance
Suspending/evicting individuals and/or equipment not complying with the EMP	<ul style="list-style-type: none"> • Construction • Operation and maintenance
Issuing fines for contravening EMP provisions	<ul style="list-style-type: none"> • Construction • Operation and maintenance

3.2 ENVIRONMENTAL CONTROL OFFICER

The PR should assign the responsibility of overseeing the implementation of the whole EMP on the ground during the construction and operation and maintenance phases to an independent external consultant, referred to in this EMP as the Environmental Control Officer (ECO). The PR/Proponent may decide to assign this role to one person for both phases and may assign a different ECO for each phase. The ECO will have the following responsibilities during the construction and operation and maintenance phases of these developments:

- Management and facilitation of communication between the PR, the contractors, and Interested and Affected Parties (I&APs) with regard to this EMP;
- Conducting site inspections (recommended minimum frequency is weekly) of all construction and/or infrastructure maintenance areas with respect to the implementation of this EMP;
- Assisting the Contractor in finding solutions with respect to matters pertaining to the implementation of this EMP;
- Advising the PR on sanctions of person(s) and/or withdrawal of equipment not complying with the provisions of this EMP;
- Making recommendations to the PR with respect to the issuing of fines for contraventions of the EMP;
- Maintaining a detailed written record of site inspections, findings, recommended remedial actions, environmental incidents etc, and
- Undertaking a quarterly review of the EMP and recommending additions and/or changes to this document.

3.3 CONTRACTOR

Contractors appointed by the Proponent are automatically responsible for implementing all provisions contained within the relevant chapters of this EMP. Contractors will be responsible for the implementation of this EMP applicable to any work outsourced to subcontractors. **Table 4-3** applies to contractors appointed during the construction phase and **Table 4-4** to those appointed during the operation and maintenance phase. In order to ensure effective environmental management, the aforementioned chapters should be included in the applicable contracts for outsourced construction, operation and maintenance work.

The tables in the following chapter (**Chapter 4**) detail the management measures associated with the roles and responsibilities that have been laid out in this chapter.

4 MANAGEMENT ACTIONS

The aim of the management actions in this chapter of the EMP is, firstly, to avoid potential impacts, then, where impacts cannot be avoided, to minimize impacts.

The following tables provide the management actions recommended to manage significant impacts rated in the scoping-level EA conducted. These management actions have been organised according to project phase:

- Applicable legislation (**Table 4-1**);
- Planning and design phase management actions (**Table 4-2**);
- Construction phase management actions (**Table 4-3**);
- Operation and maintenance phase management actions (**Table 4-4**); and
- Decommissioning phase management actions (**Table 4-5**).
- The Proponent should assess these commitments in detail and should acknowledge her commitment to the specific management actions detailed in the tables below.

4.1 ASSUMPTIONS AND LIMITATIONS

This EMP has been drafted with the acknowledgment of the following assumptions and limitations:

- This EMP has been drafted based on the scoping-level environmental assessment conducted for the proposed development. SPC will not be held responsible for the potential consequences that may result from any alterations to the above-mentioned project description.
- It is assumed that construction labourers will be sourced mostly from the Windhoek townlands area and that migrant labourers (if applicable) will be housed in established accommodation facilities within Windhoek.

4.2 APPLICABLE LEGISLATION

Legal provisions that have relevance to various aspects of these developments are listed in **Table 4-1** below.

Table 4-1: Legislation applicable to proposed development

LEGISLATION/POLICIES	RELEVANT PROVISIONS	RELEVANCE TO PROJECT
The Constitution of the Republic of Namibia as Amended	Article 91 (c) provides for duty to guard against “the degradation and destruction of ecosystems and failure to protect the beauty and character of Namibia.” Article 95(l) deals with the “maintenance of ecosystems, essential ecological processes and biological diversity” and sustainable use of the country’s natural resources.	Sustainable development should be at the forefront of this development.
Environmental Management Act No. 7 of 2007 (EMA)	Section 2 outlines the objective of the Act and the means to achieve that. Section 3 details the principle of Environmental Management	The development should be informed by the EMA.
EIA Regulations GN 28, 29, and 30 of EMA (2012)	GN 29 Identifies and lists certain activities that cannot be undertaken without an environmental clearance certificate. GN 30 provides the regulations governing the environmental assessment (EA) process.	The following listed activities are triggered by the proposed development: Activity 10.1 (b) Infrastructure Activity 10.2(a) Infrastructure
Convention on Biological Diversity (1992)	Article 1 lists the conservation of biological diversity amongst the objectives of the convention.	The project should consider the impact it will have on the biodiversity of the area.
Draft Procedures and Guidelines for conducting EIAs and compiling EMPs (2008)	Part 1, Stage 8 of the guidelines states that if a proposal is likely to affect people, certain guidelines should be considered by the proponent in the scoping process.	The EA process should incorporate the aspects outlined in the guidelines.

LEGISLATION/POLICIES	RELEVANT PROVISIONS	RELEVANCE TO PROJECT
Namibia Vision 2030	Vision 2030 states that the solitude, silence and natural beauty that many areas in Namibia provide are becoming sought after commodities and must be regarded as valuable natural assets.	Care should be taken that the development does not lead to the degradation of the natural beauty of the area.
Water Act No. 54 of 1956	Section 23(1) deals with the prohibition of pollution of underground and surface water bodies.	The pollution of water resources should be avoided during construction and operation of the development.
The Ministry of Environment, Forestry and Tourism (MEFT) Policy on HIV & AIDS	MEFT has recently developed a policy on HIV and AIDS. In addition, it has also initiated a programme aimed at mainstreaming HIV and gender issues into environmental impact assessments.	The proponent and its contractor must adhere to the guidelines provided to manage the aspects of HIV/AIDS. Experience with construction projects has shown that a significant risk is created when migrant construction workers interact with local communities.
Urban and Regional Planning Act No 5 of 2018	To consolidate the laws relating to urban and regional planning; to provide for a legal framework for spatial planning in Namibia; to provide for principles and standards of spatial planning; to establish the urban and regional planning board; to decentralise certain matters relating to spatial planning; to provide for the preparation, approval and review of the national spatial development framework, regional structure plans and urban structure plans; to provide for the preparation, approval, review and amendment of zoning schemes; to provide for the establishment of townships; to provide for the alteration of boundaries of approved townships; to provide for the disestablishment of approved townships; to provide for the change of name of approved townships; to provide for the subdivision and consolidation of land; to provide	The proposed development must adhere to the provisions regarding the subdivision and rezoning of land.

LEGISLATION/POLICIES	RELEVANT PROVISIONS	RELEVANCE TO PROJECT
	for the alteration, suspension and deletion of conditions relating to land; and to provide for incidental matters.	
Local Authorities Act No. 23 of 1992	The Local Authorities Act prescribes the manner in which a town or municipality should be managed by the Town or Municipal Council.	The development must comply with provisions of the Local Authorities Act.
Labour Act no. 11 of 2007	Chapter 2 details the fundamental rights and protections. Chapter 3 deals with the basic conditions of employment.	Given the employment opportunities presented by the development, compliance with the labour law is essential.
National Heritage Act No. 27 of 2004	The Act is aimed at protecting, conserving and registering places and objects of heritage significance.	Any protected heritage resources (e.g. human remains etc.) discovered need to be reported immediately to the National Heritage Council (NHC). A permit from the NHC will then be needed before they may be relocated.
Roads Ordinance 17 of 1972	<ul style="list-style-type: none"> Section 3.1 deals with width of proclaimed roads and road reserve boundaries Section 27.1 is concerned with the control of traffic on urban trunk and main roads Section 36.1 regulates rails, tracks, bridges, wires, cables, subways or culverts across or under proclaimed roads Section 37.1 deals with Infringements and obstructions on and interference with proclaimed roads. 	Adhere to all applicable provisions of the Roads Ordinance.
Public and Environmental Health Act of 2015	This Act (GG 5740) provides a framework for a structured uniform public and environmental health system in Namibia. It covers notification, prevention and control of diseases and sexually	Contractors and users of the proposed development are to comply with these legal requirements.

LEGISLATION/POLICIES	RELEVANT PROVISIONS	RELEVANCE TO PROJECT
	transmitted infections; maternal, ante-natal and neo-natal care; water and food supplies; infant nutrition; waste management; health nuisances; public and environmental health planning and reporting. It repeals the Public Health Act 36 of 1919 (SA GG 979).	
Nature Conservation Ordinance no. 4 of 1975	Chapter 6 provides for legislation regarding the protection of indigenous plants	Indigenous and protected plants must be managed within the legal confines.
Water Quality Guidelines for Drinking Water and Wastewater Treatment	Details specific quantities in terms of water quality determinants, which wastewater should be treated to before being discharged into the environment	These guidelines are to be applied when dealing with water and waste treatment
Environmental Assessment Policy of Namibia (1995)	The Policy seeks to ensure that the environmental consequences of development projects and policies are considered, understood and incorporated into the planning process, and that the term ENVIRONMENT is broadly interpreted to include biophysical, social, economic, cultural, historical and political components.	This EIA considers this term of Environment.
Water Resources Management Act No. 11 of 2013	Part 12 deals with the control and protection of groundwater Part 13 deals with water pollution control	The pollution of water resources should be avoided during construction and operation of the development. Should water need to be abstracted, a water abstraction permit will be required from the Ministry of Water, Agriculture and Forestry.
Forest Act 12 of 2001 and Forest Regulations of 2015	To provide for the establishment of a Forestry Council and the appointment of certain officials; to consolidate the laws relating to the management and use of	Protected tree and plant species as per the Forest Act No 12 of 2001 and Forest Regulations of 2015 may not be removed without

LEGISLATION/POLICIES	RELEVANT PROVISIONS	RELEVANCE TO PROJECT
	forests and forest produce; to provide for the protection of the environment and the control and management of forest fires; to repeal the Preservation of Bees and Honey Proclamation, 1923 (Proclamation No. 1 of 1923), Preservation of Trees and Forests Ordinance, 1952 (Ordinance No. 37 of 1952) and the Forest Act, 1968 (Act No. 72 of 1968); and to deal with incidental matters.	a permit from the Department of Forestry.
Atmospheric Pollution Prevention Ordinance No 45 of 1965	Part II - control of noxious or offensive gases, Part III - atmospheric pollution by smoke, Part IV - dust control, and Part V - air pollution by fumes emitted by vehicles.	The development should consider the provisions outlined in the act.
Hazardous Substance Ordinance 14 of 1974	To provide for the control of substances which may cause injury or ill-health to or death of human beings by reason of their toxic, corrosive, irritant, strongly sensitizing or flammable nature or the generation of pressure thereby in certain circumstances; to provide for the division of such substances into groups in relation to the degree of danger; to provide for the prohibition and control of the importation, manufacture, sale, use, operation, application, modification, disposal or dumping of such substances; and to provide for matters connected therewith.	The handling, usage and storage of hazardous substances on site should be carefully controlled according to this Ordinance.

LEGISLATION/POLICIES	RELEVANT PROVISIONS	RELEVANCE TO PROJECT
Soil Conservation Act No 76 of 1969	Act to consolidate and amend the law relating to the combating and prevention of soil erosion, the conservation, improvement and manner of use of the soil and vegetation and the protection of the water sources	The proposed activity should ensure that soil erosion and soil pollution is avoided during construction and operation.

4.3 PLANNING AND DESIGN PHASE

The PR should ensure that the management actions detailed below should be adhered to during the period before the construction of the development starts.

Table 4-2: Planning and design management actions

Aspect	Management Actions
Existing Service Infrastructure Impacts	<ul style="list-style-type: none"> Water saving mechanisms should be considered for incorporation in the developments to reduce water demands. Re-use of treated wastewater should be considered wherever possible to reduce the consumption of potable water.

4.4 CONSTRUCTION PHASE

The management actions listed in **Table 4-3** apply during the construction phase..

Table 4-3: Construction phase management actions

Environmental Feature	Impact	Management Actions	Responsible Person
EMP training	Lack of EMP awareness and the implications thereof.	<p>All construction workers are to undergo EMP training that should include as a minimum the following:</p> <ul style="list-style-type: none"> • Explanation of the importance of complying with the EMP. • Discussion of the potential environmental impacts of construction activities. • Employees' roles and responsibilities, including emergency preparedness. • Explanation of the mitigation measures that must be implemented when particular work groups carry out their respective activities. 	Contractor, PR
Conservation of vegetation	Loss of biodiversity	<ul style="list-style-type: none"> • The layout and development design should incorporate existing trees¹. • Protected trees are not to be removed without a valid permit from the local Department of Forestry • The plants that are to be kept should be clearly marked with "danger tape" to prevent accidental removal or damage. Regular inspection of the marking tool should be carried out. • Only a limited width +/- 5 m on the side of roads may be partially cleared of vegetation. • Workers are prohibited from collecting wood or other plant products on or near work sites. 	Contractor

¹a "tree" is defined as an indigenous woody perennial plant with a trunk diameter ≥ 150 mm.

Environmental Feature	Impact	Management Actions	Responsible Person
		<ul style="list-style-type: none"> No alien species may be planted on or near work areas. 	
Lay-down areas and camp	Loss of biodiversity	<p>Suitable locations for the contractors lay-down areas and camp should be identified with the assistance of the PR and the following should be considered in selecting these sites:</p> <ul style="list-style-type: none"> Areas designated for services infrastructure should be used as far possible. Degraded land. Avoid sensitive areas (e.g. rivers/drainage lines). 	Contractor and PR
Hazardous waste	Contamination of surface and groundwater sources.	<ul style="list-style-type: none"> All heavy construction vehicles and equipment on site should be provided with drip trays for oil changes, repairs and maintenance. All heavy construction vehicles should be maintained regularly to prevent oil leakages. Maintenance and washing of construction vehicles should take place only at a designated workshop area and should not take place on open soil Re-fuelling is to be conducted only over impervious surfaces Dirty oils and greases etc are to be collected, stored in drums and sent to a certified used oil recycler. 	Contractor
Water, Sewage and grey water	Contamination of surface and groundwater sources and water wasting	<ul style="list-style-type: none"> No dumping of waste products of any kind in or in close proximity to water bodies. Heavy construction vehicles should be restricted where possible to existing roads and tracks. 	Contractor

Environmental Feature	Impact	Management Actions	Responsible Person
		<ul style="list-style-type: none"> • Ensure that oil/ fuel spillages from construction vehicles and machinery are minimised and that where these occur, that they are appropriately dealt with. • Contaminated runoff from the construction sites should be prevented from entering the surface water bodies. • Grey water, where it can be contained, should be recycled: <ul style="list-style-type: none"> a. Used for dust suppression; b. Used (reused) to clean equipment. • All materials on the construction site should be properly stored. • Collection and disposal of general solid waste from the sites should be properly managed and taken to the designated landfill site in Windhoek. • Construction ablution facilities are to be located at least 30 m away from any surface water resources and should be regularly serviced. • Washing of personnel and equipment should be avoided on site. Where unavoidable, this should be done at area site located 100 m or more from surface water bodies, where there is deep soil to absorb and assimilate trace contaminants. 	

Environmental Feature	Impact	Management Actions	Responsible Person
General waste	Visual impact and soil contamination	<ul style="list-style-type: none"> The construction site should be kept tidy at all times. All domestic and general construction waste produced on a daily basis should be collected and contained daily in bins that are hyena-proof. No waste may be buried or burned. Waste containers (bins) should be emptied regularly and removed from site to a recognised (municipal) waste disposal site. All recyclable waste needs to be taken to the nearest recycling depot where practical. Separate bins for hazardous and domestic/general waste must be provided on site. These should be clearly marked as such. Construction labourers should be sensitized to dispose of waste in a responsible manner and not to litter. No waste may remain on site after the completion of the project. 	Contractor
Topsoil	Loss of topsoil and associated opportunity costs	<ul style="list-style-type: none"> When excavations are carried out, topsoil² should be stockpiled in a demarcated area. Stockpiled topsoil should be used to rehabilitate post-construction degraded areas and/or other nearby degraded areas if such an area is located a reasonable distance from the stockpile. 	Contractor

² Topsoil is defined here as the top 150mm of surface material, which accounts for the seedbank.

Environmental Feature	Impact	Management Actions	Responsible Person
Rehabilitation	Visual impact	<ul style="list-style-type: none"> • Upon completion of the construction phase consultations should be held with the local community/property owner(s) regarding the post-construction use of remaining excavated areas (if applicable). • In the event that no post-construction uses are requested, all excavated/degraded areas need to be rehabilitated as follows: <ul style="list-style-type: none"> ○ Excavated areas may only be backfilled with clean or inert fill. No material of hazardous nature (e.g. sand removed with an oil spill) may be dumped as backfill. ○ Rehabilitated excavated areas need to match the contours of the existing landscape, unless it is to be used for housing. ○ Regular inspection of revegetated areas may be needed to monitor percentage cover and to detect the development of soil erosion. ○ Topsoil is to be spread across excavated areas evenly. ○ Deep ripping of areas to be rehabilitated is required, not just simple scarification, so as to enable rip lines to hold water after heavy rainfall. ○ Ripping should be done along contours, not up and down slopes which could exacerbate erosion. 	Contractor, PR
Road safety	Injury or loss of life	<ul style="list-style-type: none"> • Demarcate roads to be used by construction vehicles clearly. 	Contractor

Environmental Feature	Impact	Management Actions	Responsible Person
		<ul style="list-style-type: none"> • Off-road driving should not be allowed. • All vehicles that transport materials to and from the site must be roadworthy. • Drivers that transport materials should have a valid driver's license and should adhere to all traffic rules. • Loads upon vehicles should be properly secured to avoid items falling off the vehicle. 	
Safety around work sites	Injury or loss of life	<ul style="list-style-type: none"> • Excavations should be left open for the shortest time possible. • Excavate short lengths of trenches and box areas for services or foundations in a manner that will not leave the trench unattended for more than 24 hours. • Demarcate excavated areas and topsoil stockpiles with danger tape. • All building materials and equipment are to be stored only within set out and demarcated work areas. • Only road construction personnel will be allowed within these work areas. • Comply with all waste related management actions stated above in this table. 	Contractor
Ablutions	Non-compliance with Health and Safety Regulations	<ul style="list-style-type: none"> • Separate toilets should be available for men and women and should clearly be indicated as such. • Portable toilets (i.e. easily transportable) should be available at every construction site: <ul style="list-style-type: none"> ○ 1 toilet for every 15 females. 	Contractor

Environmental Feature	Impact	Management Actions	Responsible Person
		<ul style="list-style-type: none"> ○ 1 toilet for every 30 males. ○ Sewage needs to be removed on a regular basis to an approved (municipal) sewage disposal site in Windhoek. ○ Alternatively, sewage may be pumped into sealable containers and stored until it can be removed. ○ Workers responsible for cleaning the toilets should be provided with environmentally friendly detergents, latex gloves and masks. 	
Open fires	Injury or loss of life	<ul style="list-style-type: none"> • No open fires may be made anywhere on site. 	Contractor
General health and safety	Injury or loss of life	<ul style="list-style-type: none"> • A fully stocked first aid kit should permanently be available on-site as well as an adequately trained member of staff capable of administering first aid. • All workers should have access to the relevant personal protective equipment (PPE). • Sufficient potable water reserves should be available to workers at all times. • No person should be allowed to smoke close to fuel storage facilities or portable toilets (if toilets are chemical toilets – the chemicals are flammable). • No workers should be allowed to drink alcohol during work hours. • No workers should be allowed on site if under the influence of alcohol. 	Contractor

Environmental Feature	Impact	Management Actions	Responsible Person
		<ul style="list-style-type: none"> • Building rubble and domestic waste should be stored in skips. • Condoms should be accessible/available to all construction workers. 	
Dust	Nuisance and health impacts	<ul style="list-style-type: none"> • A watering truck should be used on gravel roads with the heaviest vehicle movement especially during dry and windy conditions. However, due consideration should be given to water restrictions during times of drought. • The use of waterless dust suppression means (e.g. lignosulphonate products such as Dustex) should be considered. • Cover any stockpiles with plastic to minimise windblown dust. • Dust protection masks should be provided to workers if they complain about dust. 	Contractor
Noise	Nuisance impacts	Work hours should be restricted to between 08h00 and 17h00 where construction involving the use of heavy equipment, power tools and the movement of heavy vehicles is less than 500 m from residential areas. If an exception to this provision is required, all residents within the 500 m radius should be given 1 week's written notice.	Contractor
Recruitment of labourers	Negative conflict regarding recruitment	The Contractor should adhere to the below provision as a minimum for the recruitment of labour:	Contractor

Environmental Feature	Impact	Management Actions	Responsible Person
		<ul style="list-style-type: none"> • Adhere to the legal provisions in the Labour Act for the recruitment of labour (target percentages for gender balance, optimal use of local labour and SME's, etc.). • Recruitment should not take place at construction sites. • Ensure that all sub-contractors are aware of recommended recruitment procedures and discourage any recruitment of labour outside these agreed upon procedures. • Contractors should give preference in terms of recruitment of sub-contractors and individual labourers to those who are qualified and from the Windhoek project area and only then look to surrounding towns. • Clearly explain to all jobseekers the terms and conditions of their respective employment contracts (e.g. period of employment etc.) – make use of interpreters where necessary. 	
Communication plan	Negative conflict with I&APs	<p>The Contractor or proponent should draft a Communication Plan, which should outline as a minimum the following:</p> <ul style="list-style-type: none"> • How Interested and Affected Parties (I&APs), who require ongoing communication for the duration of the construction period, will be identified and recorded and who will manage and update these records. • How these I&APs will be consulted on an ongoing basis. 	Contractor

Environmental Feature	Impact	Management Actions	Responsible Person
		<ul style="list-style-type: none"> • Make provision for grievance mechanisms – i.e. how concerns can be lodged/ recorded and how feedback will be delivered as well as further steps of arbitration in the event that feedback is deemed unsatisfactory. 	
General communication	Negative conflict with I&APs	<ul style="list-style-type: none"> • The PR must appoint an ECO to liaise between the Contractor, I&APs, Developer. • The Contractor shall at every monthly site meeting report on the status of the implementation of all provisions of the EMP. • The Contractor should implement the EMP awareness training as stipulated above in this table. • The Contractor must list the I&APs of the project and their contact details with whom ongoing communication would be required for the duration of the contract. This list, together with the Communication Plan must be agreed upon and given to the PR before construction commences. • The Communication Plan, once agreed upon by the Developer, shall be legally binding. • All communication with the I&APs must take place through the ECO. • A copy of the EMP must be available at the site office and should be accessible to all I&APs. 	Contractor, ECO, PR

Environmental Feature	Impact	Management Actions	Responsible Person
		<ul style="list-style-type: none"> • Key representatives from the above-mentioned list need to be invited to attend monthly site meetings to raise any concerns and issues regarding project progress. • The Contractor should liaise with the Developer regarding all issues related to community consultation and negotiation before construction commences. • A procedure should be put in place to ensure that concerns raised have been followed-up and addressed. • All people on the I&APs list should be informed about the availability of the complaints register and associated grievance mechanisms in writing by the PR prior to the commencement of construction activities. 	
Archaeology	Loss of heritage resources	<ul style="list-style-type: none"> • Should a heritage site or archaeological site be uncovered or discovered during the construction phase of the project, a “chance find” procedure should be applied in the order they appear below: <ul style="list-style-type: none"> ○ If operating machinery or equipment, stop work; ○ Demarcate the site with danger tape; ○ Determine GPS position if possible; ○ Report findings to the construction foreman; ○ Report findings, site location and actions taken to superintendent; 	Contractor

Environmental Feature	Impact	Management Actions	Responsible Person
		<ul style="list-style-type: none"> ○ Cease any works in immediate vicinity; ○ Visit site and determine whether work can proceed without damage to findings; ○ Determine and demarcate exclusion boundary; ○ Site location and details to be added to the project's Geographic Information System (GIS) for field confirmation by archaeologist; ○ Inspect site and confirm addition to project GIS; ○ Advise the National Heritage Council of Namibia (NHCN) and request written permission to remove findings from work area; and ○ Recovery, packaging and labelling of findings for transfer to National Museum. ● Should human remains be found, the following actions will be required: <ul style="list-style-type: none"> ○ Apply the chance find procedure as described above; ○ Schedule a field inspection with an archaeologist to confirm that remains are human; ○ Advise and liaise with the NHCN and Police; and ○ Remains will be recovered and removed either to the National Museum or the National Forensic Laboratory. 	

4.5 OPERATION AND MAINTENANCE PHASE

The management actions included in **Table 4-4** below apply during the operation and maintenance phase of these developments.

Table 4-4: Operation and maintenance management actions

Environmental Feature	Impact	Management Actions	Person Responsible
EMP training	Lack of EMP awareness and the implications thereof	All contractors appointed for maintenance work on the respective streets must ensure that all personnel are aware of necessary health, safety and environmental considerations applicable to their respective work.	Contractor
Water	Surface and groundwater contamination	Ensure that surface run-off water accumulating on-site are channeled and captured through a proper storm water management system to be treated in an appropriate manner before disposal into the environment.	Proponent, Contractor,
Socio- Economic	Social Impacts	The local community be consulted in terms of possible job creation opportunities and must be given first priority if unspecialised job vacancies are available.	Proponent

Environmental Feature	Impact	Management Actions	Person Responsible
Noise	Nuisance impacts	<p>No activity having a potential noise impact should be allowed after 18:00 hours if possible.</p> <ul style="list-style-type: none"> Do not allow commercial activities that generate excessive noise levels. Continuous monitoring of noise levels should be conducted to make sure the noise levels does not exceed acceptable limits. 	Proponent
Traffic	Traffic congestion	<ul style="list-style-type: none"> Limit and control the number of access points to the site. Ensure that road junctions have good sightlines <p>Ample parking to be provided at the facility</p>	Proponent

4.6 DECOMMISSIONING PHASE

The decommissioning of these developments is not foreseen as the intended development is envisaged to be permanent. In the event that this infrastructure development is decommissioned the following management actions should apply.

Table 4-5: Decommissioning phase management actions

Environmental Feature	Management Actions
Deconstruction activity	Many of the mitigation measures prescribed for construction activity for these developments (Table 4-3 above) would be applicable to some of the decommissioning activities. These should be adhered to where applicable.

5 CONCLUSION

The management actions included in this report aim to assist in the avoidance, management and/or mitigation of potential impacts on the environment that may result from the proposed activities.

Should the measures recommended in this EMP be implemented and monitored, SPC is confident that the risks identified in the FESR can be reduced to acceptable levels.