



SWIB
TRADING CC

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ENVIRONMENTAL MANAGEMENT PLAN

APPLICATION FOR ENVIRONMENTAL CLEARANCE:

REZONING OF ERF RE/5144, ONDANGWA EXTENSION 25 FROM
"SINGLE RESIDENTIAL" WITH A DENSITY OF 1:350M2 TO "BUSINESS"
WITH A BULK OF 1.0;

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1 INTRODUCTION

SWIB Trading CC proposes to rezone Erf RE/5144, located in Ondangwa Extension 25, from its current Single Residential zoning to Business. The rezoning will facilitate a mixed-use development that includes a carwash facility and residential rental apartments. This application is submitted together with an Environmental Screening Report in compliance with the Environmental Management Act (Act No. 7 of 2007) to ensure that all potential environmental and social impacts associated with the proposed development are identified, assessed, and appropriately mitigated.

1.1 PROJECT LOCATION

Erf RE/5144 is situated within Ondangwa Extension 25, in the Oshana Region, -17.923133, 15.976364. The property measures 1,055 square meters and is positioned within an established residential neighbourhood where small-scale commercial activities and home-based businesses are already present along nearby access roads. The erf is accessible via existing municipal roads and is supported by existing water, sewer, and electricity infrastructure.

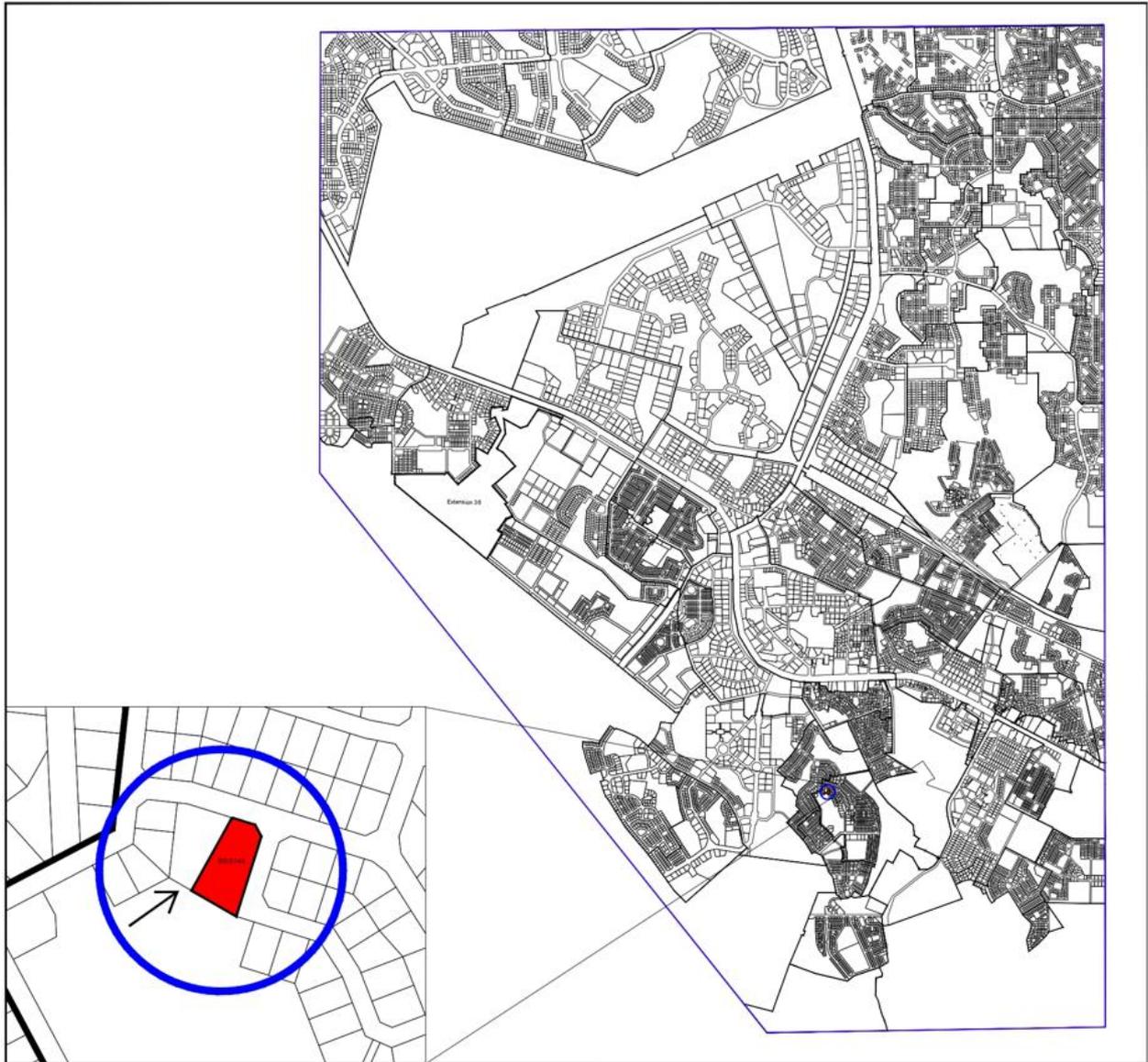
1.2 CURRENT LAND USE

The erf currently hosts one single residential dwelling. The existing structure will be demolished to allow for the construction of the proposed mixed-use development. The site is completely dry, and there are no wetlands or flood-prone areas present. There is a single Camelthorn tree located on the property, which will be **retained** within the proposed layout.

1.3 PROJECT RATIONALE

The rezoning of Erf RE/5144 is intended to align the property's legal zoning with its functional potential in the context of the surrounding neighbourhood. The proposed development will provide rental apartments, contributing to the availability of housing within Extension 25, and will include a carwash facility to meet local demand for vehicle services. The development will introduce proper planning oversight and infrastructure, including water, sanitation, and electricity connections, while ensuring that environmental and social impacts are minimized. Potential impacts, such as dust, noise, and partial removal of vegetation, will be addressed through the implementation of an Environmental Management Plan (EMP). The project will also support local economic activity by formalizing commercial operations in the area, providing employment opportunities, and maintaining the human-scale character of the existing neighbourhood.

Figure 1: Locality of Erf Re/5144 Ondangwa Extension 25



1.4 INFRASTRUCTURE

The erf and surrounding neighbourhood are supported by essential municipal services provided by Ondangwa Town Council. Electricity is available on site and is supplied by Nored, ensuring reliable power for both residential and commercial uses. Water is supplied directly by the Town Council, providing adequate potable water for domestic and business purposes. The site is also connected to the municipal sewage system, ensuring proper sanitation and wastewater management.

The proposed rezoning and development will make full use of these existing services, integrating formal connections to water, electricity, and sewage for both the carwash business and rental apartments, thereby meeting local planning standards and public health requirements.



Figure 2: Municipal services on site

An EMP is one of the most important products of an Environmental Assessment (EA) process. An EMP synthesises all recommended mitigation and monitoring measures, laid out according to the various stages of a project life cycle, with clearly defined follow-up actions and responsibility assigned to specific actors. This EMP has been drafted in accordance with the Namibian Environmental Management Act (No. 7 of 2007) and its Environmental Impact Assessment Regulations (2012). This plan describes the mitigation and monitoring measures to be implemented during the following phases of the township establishment:

- Planning and Design;
- Construction and
- Operation

1.5 POLLUTION AND FLOOD RISK

Erf RE/5144 is fully serviced with municipal water and sewage systems provided by Ondangwa Town Council, and electricity connections by Nored. As such, the site is not vulnerable to pollution or contamination of surface or groundwater due to a lack of municipal services. Proper sanitation and waste management infrastructure are already in place, minimizing environmental risks associated with domestic or commercial activities.

Additionally, the erf is located entirely on dry land and is not subject to flooding. There are no flood-prone areas on the property, and therefore, no flood mitigation measures are required. The proposed development will utilize the existing dry land efficiently, accommodating the carwash business and rental apartments without impacting any natural watercourses or floodplains.

The development will follow standard environmental safeguards during construction to limit dust, noise, and any temporary impacts on the surrounding neighbourhood.

2 RESPONSIBILITIES

This section of the EMP provides management principles with the proposed township.

2.1 KEY ROLE PLAYERS

The implementation of the Environmental Management Plan (EMP) for the proposed rezoning and development of Erf RE/5144 is the responsibility of Mr. Nikodemus Amadhila, the property owner and Developer. Ondangwa Town Council is involved only as the regulatory authority, responsible for reviewing, approving, and monitoring compliance with the EMP during the development approval process.

Developer (Property Owner)

Mr. Nikodemus Amadhila, as the Developer, is responsible for:

- Ensuring the EMP is fully implemented on site.
- Appointing competent contractors and subcontractors to carry out construction works.
- Providing resources for EMP compliance, including environmental awareness training and supervision.
- Coordinating with the Environmental Control Officer (ECO) to monitor environmental performance.

Employer's Representative (ER)

The ER is appointed by the Developer to manage all outsourced contracts during construction. The ER may be a competent employee or a third-party organisation with relevant experience. All official communication regarding construction work must be delivered through the ER.

The ER's responsibilities include:

- Ensuring the Contractor obtains all necessary legal authorisations and permits.
- Assisting the Contractor in finding environmentally responsible solutions to problems, in consultation with the ECO where necessary.
- Warning and ordering the removal of individuals or equipment that do not comply with the EMP.
- Issuing fines and penalties for transgressions of site rules and the EMP.
- Providing input to the ECO's ongoing internal review of the EMP, with reports submitted to the Developer on a monthly basis.

Environmental Control Officer (ECO)

The ECO is appointed by the Developer to serve as the on-site representative responsible for monitoring and auditing compliance with the EMP. If the ECO does not have occupational safety and health training for construction sites, the Developer must ensure they are trained.

The ECO's duties include:

- Assisting the ER in ensuring all legal authorisations have been obtained.
- Maintaining open lines of communication between the Developer, ER, Contractor, and Interested and Affected Parties (I&APs).
- Conducting monthly inspections of all construction areas to verify EMP compliance.
- Monitoring and auditing the implementation of the EMP to minimize environmental impacts.
- Taking corrective action when EMP specifications are not followed.
- Training all construction personnel on EMP mitigation measures and promoting environmental awareness.
- Ensuring that all new workers receive an induction presentation on EMP requirements.
- Advising on the removal of personnel or equipment not complying with the EMP.
- Recommending fines or penalties for violations of the EMP.

- Undertaking a three-month review of the EMP and recommending updates or changes.

Contractor

The Contractor is responsible for the on-site implementation, monitoring, and evaluation of the EMP. Relevant sections of the EMP must be included in all contracts to legally bind all appointed contractors.

The Contractor must maintain records of all environmental training sessions, including participant names, dates, and content, for inspection and reporting to the Developer, ER, and ECO as required.

3 RELEVANT LEGISLATION

Table 1: Permit Requirements and Legislation

THEME	LEGISLATION INSTRUMENT	MANAGEMENT REQUIREMENTS
ENVIRONMENTAL:	Environmental Management Act 7 of 2007 EIA Regulations (EIAR) GN 57/2007 (GG 3812)	The amendment, transfer or renewal of the Environmental Clearance Certificate (EIAR s19 & 20).
FORESTRY:	Forest Act 12 of 2001	Protected tree species and any vegetation within 100m from a watercourse may not be removed without a permit from the Ministry of Agriculture, Water and Forestry.
LABOUR:	Labour Act 11 of 2007 Health and Safety Regulations (HSR) GN 156/1997 (GG 1617).	Adhere to all applicable provisions of the Labour Act and the Health and Safety regulations.

4 PLANNING AND DESIGN PHASE

Table 2: Management Requirements for the Planning and Design Phase

ASPECT	MANAGEMENT REQUIREMENTS
Natural Building Material	All building material (sand and gravel) must be sourced from a local registered borrow pit only. Road building material, (G4, G5, etc. material) must be sourced in collaboration with the Ondangwa Town Council from approved borrow pits within the Ondangwa townlands. If suitable material can only be sourced from untouched land to create a new borrow pit, then that is legally subject to an EIA as well by the Ondangwa Town Council.
EMP Implementation	Relevant sections of this EMP should be included in the tender documents for all development so that tenderers can make provision for implementation of the EMP.
Financial Provisions	<ul style="list-style-type: none"> • Financial provision for the facilitation of an induction programme for senior, temporary construction personnel as well as subcontractors and associated personnel should be included as a cost item within tenders concerning the construction and/or operation and maintenance of the proposed development. • Financial provision for the compilation of a Tree Management Plan should be included as a cost item within construction tender documents. • Financial provision for the compensation of current occupants on the site as per the <i>Compensation Policy Guidelines for Communal land as recently amended</i>.
Recruitment	<ul style="list-style-type: none"> • Provisions designed to maximise the use of local labour should be included within tenders concerning the construction of bulk services. • A provision stating that all unskilled labour should be sourced locally should be included in tenders concerning the construction of all bulk services in the township. • Specific recruitment procedures ensuring local firms enjoy preference during tender adjudication should be

	<p>included in tenders concerning the construction of the township's bulk services.</p> <ul style="list-style-type: none"> • Provisions promoting gender equality pertaining to recruitment should be included in tenders concerning the construction of the township services. • Women should be given preference for certain jobs (e.g. those jobs that require relatively less physical strength).
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5 OPERATIONAL MITIGATION DETAILS

Table 3 provides a scaled overview of all the major environmental management themes pertaining to both generic and site-specific operational mitigation details. This table serves a quick reference, for the detailed mitigation details that follow subsequently for each theme. This is done to simplify the implementation of the operational component of this EMP.

Table 3: Generic and site-specific Environmental Management Actions

THEME	OBJECTIVE	MITIGATION DETAIL	
		GENERIC	SITE-SPECIFIC
WASTE MANAGEMENT	Minimise and avoid all pollution associated with construction.	PLAN COMPONENT 1	YES
HEALTH AND SAFETY	Focusing on the wellbeing of the labourers on and the community near the construction.	PLAN COMPONENT 2	YES
NOISE AND DUST	Minimise and avoid all noise and dust associated with construction.	PLAN COMPONENT 3	YES
ENVIRONMENTAL TRAINING AND AWARENESS	Awareness creation regarding the provisions of the EMP as well as the importance of safeguarding environmental resources.	PLAN COMPONENT 4	YES

ENVIRONMENTAL CONSERVATION	Minimise the effect of the construction and protect the natural environment in which it is happening.	PLAN COMPONENT 5	YES
EMPLOYMENT/ RECRUITMENT	Minimise negative conflict through legal and fair recruitment practices.	PLAN COMPONENT 6	YES
STAKEHOLDER COMMUNICATION	Provide a platform for stakeholders to raise grievances and receive feedback and hence minimize negative conflict.	PLAN COMPONENT 7	YES
SOCIO-ECONOMIC AND MISCELLANEOUS	Protecting cultural and general wellbeing of the affected.	PLAN COMPONENT 8	N.A

5.1 PLANNING COMPONENT 1: WASTE MANAGEMENT

At the construction site, high importance shall be placed on waste management, and need to be performed on a daily basis. Solid waste is the expected major source of waste at the construction site and therefore a *Waste Management Plan* must be compiled. The Waste Management plan must address measures for the uses and the disposal of general waste and hazardous waste at the site, as indicated below:

5.1.1 General Waste

- The construction site should be kept tidy at all times. All general construction waste produced should be cleaned and contained daily.
- No waste may be buried or burned.
- No waste may be dumped in any watercourse in and around the project area.
- A sufficient number of separate waste containers (bins) for hazardous and domestic/general waste must be provided on site. These should be clearly marked as such.
- Construction labourers should be sensitised to dispose of waste in a responsible manner and not to litter.

5.1.2 Hazardous Waste

- All heavy construction vehicles and large fuel-powered equipment on the site should be provided with a drip tray.
 - If the vehicle used is suspected of having an oil leakage, drip trays are to be transported with vehicles wherever they go on site.
 - Drip trays should be cleaned daily and spillage handled, stored, and disposed of as hazardous waste.
- Spilt concrete (wet) should be treated as waste and disposed of by the end of each day in the appropriate waste containers.
- Unbound cement (dry) in its raw state and cement infused water from mixers are classified as hazardous waste, due to its high alkalinity content. Treatment would be the same as for hazardous waste and disposal of such should take place in the appropriate labelled hazardous waste containers.
- A hazardous waste spill clean-up kit should be kept onsite and its stock replenished as needed. The kit will consist of the following items (with the numbers of each item is up to the discretion of the ER):
 - Medium sized shovels, strong plastic bags, drip trays, dust masks, heavy-duty gloves, and a biodegradable hand wash (decreasing) agent.
- A storage location must be provided for the use of all hazardous substances (e.g. fuel etc.) or chemicals. The storage area must be of an impermeable surface; this is bonded awaiting use and disposal afterwards.

During the operation stage, the Ondangwa Town Council will monitor and maintain the sewerage and storm water pipelines. Thereby a monthly waste management compliance report should be handed to the ER, who shall evaluate and act upon any non-compliances.

5.2 PLANNING COMPONENT 2: HEALTH AND SAFETY

The health and safety aspect of workspaces is something that cannot be understated; considering that a serious unexpected event can occur at any given moment. The construction industry is fraught with hazards; therefore, careful planning and prevention measures are necessary to reduce the risk of serious injuries while on duty.

5.2.1 HIV/AIDS and TB training

- The contractor should approach the Ministry of Health and Social Services to appoint

a health officer to facilitate HIV/AIDS and TB education programmes periodically on site during the construction phase.

5.2.2 Road Safety

- Vehicles contents/consignments should be properly secured to avoid items falling off the vehicle.
- All trucks carrying sand or fine material loads should be covered with a shade net cover to prevent these materials from being blown off onto approaching vehicles from both directions.
- No construction vehicle may be used to transport personnel to and from the construction site. This is an offence and punishable by law due to the extreme safety risk involved.

5.2.3 Safety around Excavated and Work Areas

- A meeting with the neighbouring community will be held and the safety precautions of the construction area explained.
- Excavations should be left open for an absolute minimum time only.
- Excavate short lengths of trenches and box areas for services or foundations in such a way that the trench will not be left unattended for more than 24 hours.
- Demarcate the following areas with danger tape or orange demarcation netting:
 - All excavation works;
 - Soil and other building material stockpiles; and
 - Temporary waste stockpiles.
- Provide additional warning signage in areas of movement and in "no personnel allowed" areas where workers are not active.
- Work areas must be set out and isolated with danger tape on a daily basis.
- All building materials and equipment are to be stored only within set out and demarcated work areas.
- Only construction personnel will be allowed within these demarcated work areas.
- Two dry chemical powder fire extinguishers should be available at fuel storage areas and the workshop area, as well as the site office.

5.2.4 Ablutions

- Separate ablutions (toilet) 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:
 - 1 toilet for every 25 females.
 - 1 toilet for every 50 males.
- Sewage waste needs to be removed on a regular basis to an approved (municipal) sewage disposal site. Alternatively, pump it into sealable containers and store it until it can be removed.
- Workers responsible for cleaning the toilets should be provided with latex gloves and masks.

5.2.5 Emergency Contact Numbers in Ondangwa

- Police: 065 242 650
- Fire Services: 97000
- Electrical Services: 083 282 2100
- Water Services: 065 240 101
- Hospital: 065 283 100
- Ambulance: 065 280 400

During the monitoring process, the ER should compile a checklist of all health and safety aspects contained in this section and once a month a compliance assessment should be done. The findings should be discussed at monthly management meetings, and all recommendations for improvements proposed to be implemented with immediate effect.

5.3 PLAN COMPONENT 3: NOISE AND DUST

The construction site is on the outside edge of the existing Ondangwa Town. However, high priority will be placed on mitigation measures at the construction site to manage dust and noise. The following measures are provided below to minimise noise and dust:

5.3.1 Noise

- Work hours should be restricted to between 07h00 and 18h00 where construction involving the use of heavy equipment and the movement of heavy vehicles is less than 500m from residential areas.
- In the event that work is necessary outside the designated working hours, all receptors (residents or businesses within 500 m from the work areas) will need to be notified at least 2 days in advance.

5.3.2 Dust

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 and applicable seasons.

- Stockpiles of building material and earth material need to be kept moist or the surfaces need to be kept stabilised. A nylon mesh cover which reduces dust lift with $\pm 50\%$ can be an alternative option.
- Limit the size of stockpiles of large quantities of soil, topsoil and other fine material.
- Dust protection masks should be issued to all workers exposed to dust on the site.
- Improve awareness of ambient air quality and consideration regarding wind speed and direction when undertaking dust generating activities

During the construction phase, emphasis should be placed on preventing the removal of vegetation or the removal of soil on the site, if not absolutely necessary. However, when complaints are received regarding dust nuisance, abatement in the form of water spraying should be implemented on the site

5.4 PLANNING COMPONENT 4: ENVIRONMENTAL TRAINING AND AWARENESS

All construction workers at the development site are to undergo environmental training and awareness programs. The following aspects should be included:

- 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 workgroups carry out their respective activities.
- Explanation of the specific mitigation measures within this EMP especially unfamiliar provisions.

During the training sessions, an attendance register should be completed, including the names, positions designations and signatures of everyone who attended the training and kept on file for auditing purposes. Thereby, all the training sessions prior to it being conducted must be approved by the ECO.

5.5 PLAN COMPONENT 5: ENVIRONMENTAL CONSERVATION

As a general principle, the developer wishes to keep all large trees as far as possible. Larger trees next to water basins are protected through reserving the areas next to the basins as public open spaces. However, in connection with the environmental conservation aspect on the site, the following conservation measures should be included:

5.5.1 Conservation of Vegetation

Any post-construction layout and building design submitted for constructing a building on any Erf within the township should incorporate existing large indigenous trees. Refer to the planning and design phase specifications in this EMP for more details. Thereby the contractor should compile a *Tree Management Plan*, which should include the following as content at the minimum level:

- As an initiative, trees with a trunk size of 250 mm and bigger should be surveyed, marked with paint and taken into consideration in the design of the servitudes and roads;
- Trees with a trunk size of 250 mm and bigger, which are impossible to conserve, need to be identified and their location recorded on a map.
- Special attention should be given to the conservation of the trees within the oshanas.
- All trees, which are to be retained, are to be clearly indicated on a site plan and demarcated.
- Each tree that is removed needs to be replaced after construction in an appropriate position.
- Trees can be obtained at the Ondangwa forestry office or at a commercial nursery. The forestry officers can also direct to nearby nurseries where additional trees may be bought.

5.5.2 Materials Camp and Lay-Down Areas

A suitable location for the **materials camp and lay-down** areas should be identified with the assistance of the ER and the following should be considered in selecting these sites:

- The areas designated for the proposed services infrastructure should be used as far as possible.
- The second choice should be degraded land.
- Sensitive areas should be avoided (e.g. watercourses).

5.6 PLAN COMPONENT 6: EMPLOYMENT/RECRUITMENT

The formal recruitment process should be compiled and shall include the following minimum provisions:

5.6.1 Recruitment

- A recruitment process whereby local residents shall be given preference shall be designed by the ER and the contractor.
- Ensure that all sub-contractors are aware of recommended recruitment procedures and discourage any recruitment of labour outside the agreed-upon process.
- Contractors should give preference in terms of recruitment of sub-contractors and individual labourers to those from the project area and only then look to surrounding towns.
- Clearly explain to all job-seekers the terms and conditions of their respective employment contract (e.g. period of employment, etc.) – make use of interpreters when required.

5.6.2 Legislation

The contractor needs to 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.) in the contract.

5.7 PLAN COMPONENT 7: STAKEHOLDER COMMUNICATION

A public meeting was scheduled and advertised in the newspapers to be held on site at Ondangwa on the 22 February 2026 however there was no attendance by the public, the meeting was aimed to create a stakeholder database, to inform and to get feedback from the residents in the surrounding area.

The main objective of the public meeting was to provide the broader public with feedback on the main findings of the environmental screening report (ESR) and proposed mitigation measures, as well as to provide them with the opportunity to raise any queries and comments regarding the ESR studies and the proposed Townships establishment.

Within the construction phase, the developer should draft a *Communication Plan*. Thereby the ER in collaboration with the developer must appoint an ECO to liaise between the contractor, stakeholders, developer, and consultants. The appointed contractor shall appoint a person from the construction team to take responsibility for the implementation for all provisions of this EMP.

5.7.1 Communication Plan

In addition, the plan shall specify:

- How stakeholders, 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 stakeholders will be consulted on an ongoing basis;
- How grievances shall be handled – i.e. how concerns can/ will be lodged/ recorded and how feedback will be delivered as well as further steps of arbitration in the event that feedback is deemed unsatisfactory.

5.7.2 General Communication

- The Contractor shall at every site meeting report on the status of the implementation of all provisions of the EMP.
- The ECO must list the stakeholders 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 ER before construction commences.
- The Communication Plan, once agreed upon by the developer, shall be binding.
- All communication with the stakeholders must take place through the ECO.
- A copy of the EMP must be available at the site office and should be accessible to all stakeholders.
- 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 stakeholder's list should be informed about the availability of the complaints register in writing by the ER prior to the commencement of construction activities.

5.8 PLAN COMPONENT 8: SOCIO-ECONOMIC AND MISCELLANEOUS

No heritage or archaeological sites were found in the areas. However, the EMP's standard procedures for heritage or archaeological sites are still included in this plan. No formal survey for archaeological remains was conducted during the field studies of the site, therefore the possibility of it containing some or the other form of remnants cannot be ruled out, especially when excavations are done.

Heritage or Archaeological Sites

In the case where a heritage or archaeological site is uncovered or discovered during the construction phase of the development, a 'chance find' procedure should be applied as follows:

- If operating machinery or equipment to stop work immediately;
- Demarcate the site with danger tape;
- Determine GPS position if possible;
- Report findings to foreman;
- Cease any works in the immediate vicinity;
- Visit the site and determine whether the work can proceed without damage to the findings;
- Determine and demarcate the exclusion boundary;
- Inspect site and confirm the exact location.
- Advise the National Heritage Council (NHC) and request written permission to remove findings from the work area; and
- Recovery, packaging and labelling of findings for transfer to National Museum.

Should human remains were found, the following actions will be required:

- Apply the 'chance find' procedure as formerly described;
- Schedule a field inspection with an archaeologist to confirm that the remains are human;
- Advise and liaise with the NHC and Police; and
- Remains will be recovered and removed either to the National Museum or the National Forensic Laboratory.

If it is found that the construction site is on a heritage site or an archaeological site, the developer will need to apply for a permit from the National Heritage Council in order to carry out works in a protected place as indicated in the National Heritage Act 27 of 2004.