



ENVIRONMENTAL IMPACT ASSESSMENT TO OBTAIN AN ENVIRONMENTAL CLEARANCE CERTIFICATE FOR THE SUBDIVISION OF THE REMAINDER OF ERF 439 KLEIN WINDHOEK INTO PORTION A AND THE REMAINDER IN ORDER TO USE PORTION A TO EXTEND SCHULTZ STREET, KHOMAS REGION, NAMIBIA”.

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Project Name:	Environmental Impact Assessment to obtain an Environmental Clearance Certificate for the Subdividing of the Remainder of Erf 439 Klein Windhoek into Portion A and the Remainder in order to use Portion A to extend Schultz Street
Project Proponent:	Sakhiwo Health Solutions
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Table 1: The key characteristics/environmental impacts of the proposed project are as follows:

Impact on Environment	Nature of Impact
More efficient and intensive use of land.	Positive for the City of Windhoek.
Creation of employment and transfer of skills.	Positive as employment will be created during and after operation
Impact on utilization of municipal and other infrastructure and facilities.	Positive due to the better utilization of existing municipal infrastructure.
There will be an impact on traffic.	Negative during operational as it will result in the increase in traffic in the city and on the roads in the area
The creation of noise.	On par with the noise levels associated with the neighbouring uses
Possible impact on cultural/heritage aspects.	The proposed site of development is not within any known monument sites, both movable and immovable therefore there will be no impact.
Impact on fauna and flora.	Low, since the land is mostly degraded, bare and covered with a few shrubs and there are no animals on the site.
Impact on groundwater, surface water and soil.	The impact will be negative in case of spilling of hazardous materials during operation.
Impact on health and safety.	Low if mitigated during operations

None of the potential impacts identified are regarded as having a significant impact to the extent that the proposed project should not be allowed. However, the operational activities further on need to be controlled and monitored by the assigned subcontractors and the proponent.

TABLE OF CONTENTS

Contents

TABLE OF CONTENTS	3
List of Figures	4
List of Tables.....	4
List of Abbreviations.....	5
1. INTRODUCTION.....	6
2. LOCATION OF THE PROPOSED PROJECT.....	7
3. THE DESCRIPTION OF THE PROJECT.....	8
4. THE SCALE OF OPERATION OF THE PROJECT	8
5. POLLUTION POTENTIAL OF THE PROPOSED PROJECT	8
6. MITIGATION MEASURES	9
7. PUBLIC PARTICIPATION PROCESS.....	9
8. RESPONSIBILITIES OF PARTIES	12
8.1 Employer’s representative	13
8.2 Environmental control officer	14
8.3 Contractor.....	15
9. PLANNING AND DESIGN MANAGEMENT PLAN.....	15
9.1 LEGISLATIVE FRAMEWORK	15
9.2 CONSTRUCTION PHASE AND MITIGATION MEASURES	23
SECTION A: WASTE MANAGEMENT	24
SECTION B: BORROW PITS	26
SECTION C: HEALTH AND SAFETY	26
SECTION D: DUST AND NOISE	29
SECTION E: ENVIRONMENTAL TRAINING AND AWARENESS	29
SECTION F: ENVIRONMENTAL CONSERVATION.....	30
SECTION G: EMPLOYMENT/RECRUITMENT.....	31

SECTION H: STAKEHOLDER COMMUNICATION 31
SECTION I: SOCIO-ECONOMIC AND MISCELLANEOUS 32
SECTION J: OPERATION AND MAINTANANCE PHASE 33

APPENDIX A: PRESS NOTICES

APPENDIX B: NEIGHBOURS NOTICES.....

APPENDIX C: LAYOUT PLAN OF THE PROPOSED PROJECT

List of Figures

Figure 1: Location of R/439 Sam Nujoma, Klein Windhoek

Figure 2 & 3: The locality Klein Windhoek within the Windhoek Map

Figure 4: Customer Care Notice of the Remainder of Erf 439 Sam Nujoma Drive, KW

Figure 5: Site Notice of the Remainder of Erf 439 Sam Nujoma Drive, KW

List of Tables

Table 1: The key characteristics/environmental impacts of the proposed project

Table 2: Generic and site-specific environmental management actions for the construction phase

Table 3: Operation and Maintenance Phase

List of Abbreviations

- EIA - Environmental Impact Assessment
- EMP - Environmental Management Plan
- I&APs - Interested and Affected Parties
- MEFT - Ministry of Environment, Forestry and Tourism
- DEA - Department of Environmental Affairs
- BID - Background Information Document
- ER - Employers Representative
- ECO - Environmental Control Officer
- WMP - Waste Management Plan
- TIA - Traffic Impact Assessment

1.INTRODUCTION

Sakhiwo Health Solutions, owners of Remainder of Erf 439 Sam Nujoma Drive, Klein Windhoek intend to subdivide Remainder of Erf 439 Sam Nujoma Drive, Klein Windhoek into Portion A and the Remainder. Portion A will be transferred to the ownership of the Municipality of Windhoek in lieu of the betterment fee payment and will be used to extend an already existing street called Schultz Street.

According to the Environmental Management Act, 2007 (Act No. 7 of 2007) under section 27 which stipulates that no one can undertake development activities without obtaining an environmental clearance certificate, Sakhiwo Health Solutions is therefore required to do an environmental impact assessment in order to evaluate and address the potential environmental impacts associated with the proposed subdivision of Remainder Erf 439 Klein Windhoek into Portion A ($\pm 141\text{m}^2$) and the Remainder.

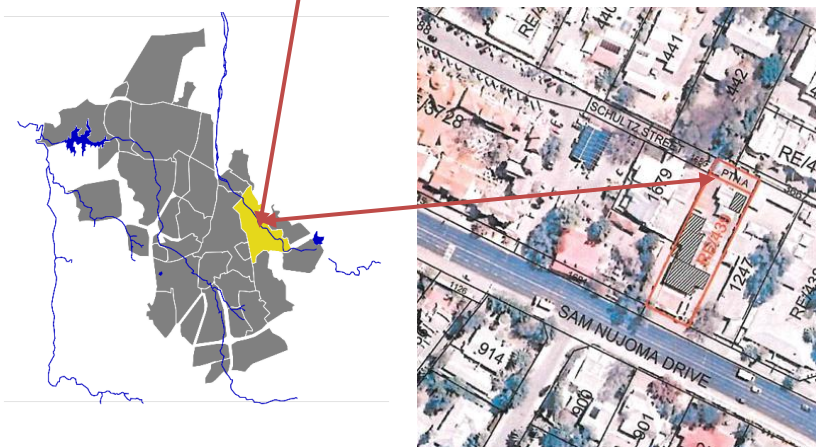
2.LOCATION OF THE PROPOSED PROJECT

The Remainder of Erf 439 is prominently positioned along Sam Nujoma Drive in Klein Windhoek, one of the city’s busiest and most diverse suburbs. Klein Windhoek is characterized by a dynamic mix of land uses, ranging from residential and general residential developments to thriving businesses and professional offices. This blend of activity, especially along such a vital arterial route as Sam Nujoma Drive, underscores the strategic importance of the property’s location.

At present, the erf is utilized as office space, with a rezoning process underway to formalize its designation as office zoning. In alignment with municipal planning objectives, Portion A of the erf measuring approximately 141m² will be transferred to the City of Windhoek. This transfer will enable the extension of Schultz Street, which borders the northern boundary of the property, thereby improving accessibility and strengthening the connectivity of Klein Windhoek’s urban fabric.



Figure 1: The Namibian map showing Windhoek



Figures 2 & 3: The locality Klein Windhoek within the Windhoek Map

3. THE DESCRIPTION OF THE PROJECT

The owners of Erf R/439 Klein Windhoek rezoned the property from "Residential" with a density of 1:900m² to "Office" with a bulk factor of 0.4. However, in addition to the rezoning approval, a proposal to subdivide Erf R/439 into Portion A and the Remainder was requested by the Municipality of Windhoek. Following the recommendation for rezoning, and in accordance with Article 34(1) of the Town Planning Ordinance, 1954, a betterment fee calculated as a percentage of the increase in land value is payable to the City of Windhoek by the owner. To satisfy this obligation, it was resolved that Portion A (a portion of Erf R/439 Sam Nujoma Drive, Klein Windhoek) be transferred to the City of Windhoek in lieu of a pro rata betterment contribution.

4. THE SCALE OF OPERATION OF THE PROJECT

This is a small-scale project, covering 141m² that is Portion A, the area is already built up and so the Municipality of Windhoek together with Sakhiwo Health solutions will be responsible for extending the existing street. This project will not generate a lot of pollution and mitigation measures will be undertaken to minimize any pollution impacts.

5. POLLUTION POTENTIAL OF THE PROPOSED PROJECT

The proposed subdivision of the Remainder of Erf 439 Klein Windhoek into Portion A and the Remainder, including the extension of Schultz Street, is considered a small-scale urban infrastructure project with relatively low pollution potential due to the limited extent of construction activities and the already developed nature of the surrounding environment. However, some temporary pollution impacts may arise during the construction and operational phases of the project.

Potential pollution sources include dust emissions from excavation and movement of construction vehicles, noise generated by construction machinery and equipment, improper disposal of construction waste, accidental oil or fuel spills from machinery, and sewage waste generated by construction workers. Minor soil contamination and surface runoff pollution may also occur if hazardous materials are not properly handled. During operation, increased traffic movement along the extended street may contribute slightly to noise, dust, and vehicle emissions within the area.

6. MITIGATION MEASURES

To minimise and control pollution impacts associated with the proposed project, the following mitigation measures should be implemented:

- Construction waste must be collected daily and disposed of at approved municipal disposal sites.
- Separate waste containers should be provided for general and hazardous waste.
- No waste shall be buried, burned, or disposed of in watercourses or open areas.
- Dust suppression measures, such as regular watering of exposed surfaces and gravel roads, should be undertaken during dry and windy conditions.
- Construction activities generating excessive noise should be limited to normal working hours (08h00–17h00).
- All construction vehicles and machinery must be regularly maintained to prevent oil and fuel leaks.
- Drip trays should be placed beneath stationary machinery and vehicles to prevent soil contamination.
- Hazardous substances such as fuel, oil, and cement must be stored in designated impermeable areas.
- Spill kits must be available onsite at all times to manage accidental spills.
- Portable ablution facilities should be provided for workers, and sewage waste must be disposed of at approved municipal treatment facilities.
- Construction workers should receive environmental awareness training to ensure compliance with environmental management measures.
- Disturbance outside the designated construction area should be avoided to protect surrounding vegetation and the urban environment.
- Regular environmental monitoring and inspections should be undertaken by the Environmental Control Officer (ECO) to ensure compliance with the Environmental Management Plan (EMP).

7. PUBLIC PARTICIPATION PROCESS

Public participation is a cornerstone of Namibia's Environmental Impact Assessment (EIA) process and is mandated under the Environmental Management Act (EMA) No. 7 of 2007 and its Regulations (2012). The objective is to ensure that Interested and Affected Parties (I&APs) are informed about the project, given an opportunity to raise concerns, and allowed to contribute to the planning and assessment process. For this project, the public participation process was designed to be transparent, inclusive, and accessible, allowing engagement from residents,

businesses, institutions, and the broader Klein Windhoek suburb.

The public participation was carried out as stipulated by the Urban and Regional Planning Act (No.5 of 2018) as well as the guidance of the Environmental Management Act No. 7 of 2007. It was intended to be fully inclusive of all the affected neighbours and the Klein Windhoek society at large.

7.1 Objectives of Public Participation

The goals of the stakeholder engagement process were to:

- a) Inform stakeholders about the nature and scope of the proposed project.
- b) Provide opportunities for I&APs to express concerns, insights, or support.
- c) Identify potential environmental and social issues early in the EIA process.
- d) Ensure that local knowledge and values contribute to decision-making.
- f)
- e) Build trust between the Proponent, community, and authorities.
Promote environmental accountability and transparency.

7.2 Identification of Interested and Affected Parties (I&Aps)

I & Aps for this project included:

Government and Authorities such as

- a) Municipality of Windhoek
- b) Ministry of Environment, Forestry and Tourism
- c) Ministry of Urban and Rural Development
- d) The direct neighbours of the Remainder Erf 439 Klein Windhoek

Directly affected Stakeholders

The directly affected stakeholders are the Municipality of Windhoek, the owners of Remainder Erf 439 Klein Windhoek, the properties within a 50m radius to R/439, Ministry of Urban and Rural Development.

7.3 Notification Methods

To ensure effective communication, multiple legally compliant notification methods were used:

- a) **Newspaper Notices:** Published in the *New Era* and the *Republikein* (published for two

consecutive weeks as per the requirements)

- b) Municipal Notice: A site notice was placed on the City of Windhoek Customer Care notice board

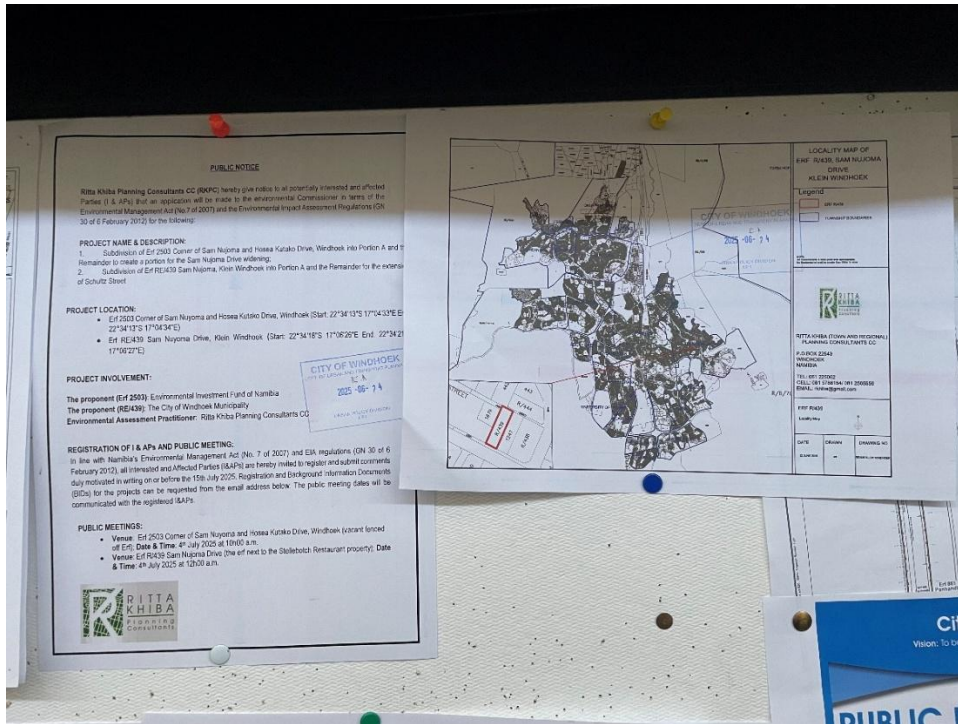


Figure 4: Customer Care Notice of the Remainder of Erf 439 Sam Nujoma Drive, KW

- c) Site Notices: An A2 notice was placed on site, informing the neighbouring properties and passerby members of society of the EIA to attain and ECC for the subdivision of the Remainder of Erf 439 Sam Nujoma Drive, Klein Windhoek

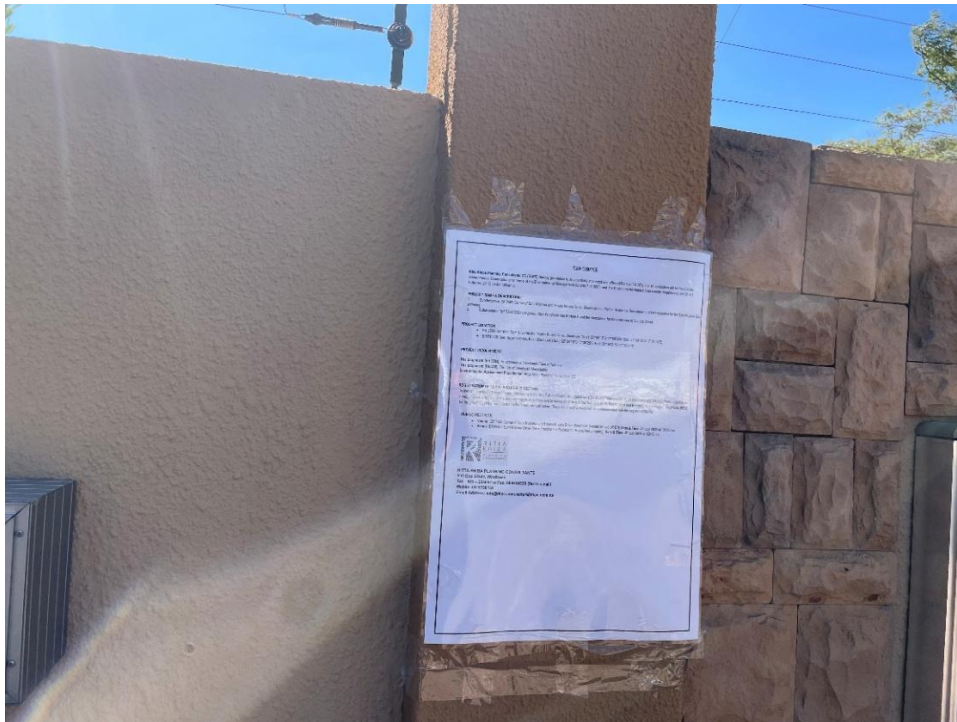


Figure 5: Site Notice of the Remainder of Erf 439 Sam Nujoma Drive, KW

7.4 Public Meeting

A consultation event was scheduled to take place on 4 July 2025 at 12h00 on Erf R/439 Sam Nujoma Drive. The consultants arrived at the site at 11h30 and waited for a period exceeding two hours; however, no attendees presented themselves for the meeting. Consequently, the consultants proceeded to conduct face-to-face consultations with surrounding stakeholders regarding the proposed subdivision of Erf R/439 Sam Nujoma Drive, Klein Windhoek. *The signed form is attached to this document as an annexure.*

One neighbour registered as an Interested and Affected Party (I&AP) and raised several concerns, while another neighbour also submitted a comment form outlining their concerns. Both forms were subsequently forwarded to the consultant via email. *Both their letters are attached as annexure.*

8. RESPONSIBILITIES OF PARTIES

The responsibility for the implementation of the EMP lies with the Sakhwiwo Health Solutions in conjunction with the Municipality of Windhoek who is also responsible for the eventual operation of the project. The implementation of this EMP requires the involvement of several stakeholders,

each fulfilling a different but vital role to ensure sound environmental management during each phase of the project. Sakhiwon Health Solutions will appoint an Employer's Representative (ER) to oversee all aspects of the project (including all contracts for work outsourced) – one for the construction phase and one for the operational phases. The ER will in turn appoint an Environmental Control Officer (ECO) to oversee the implementation of the entire EMP. The various responsibilities of each party are discussed below:

8.1 Employer's representative

The ER is appointed by Sakhiwo Health Solutions manage all contracts for work/services that are outsourced during the construction, operations and maintenance and decommissioning

phases. This role may be filled by any competent employee or someone outside the organisation with the necessary background. This individual or organisation is the conduit for all official correspondence pertaining to work agreements. Employer's Representative (ER) will have the following responsibilities with respect to the EMP implementation:

- Act as the site project manager and implementing agent;
- Ensure that the proponent's responsibilities are executed in compliance with the relevant legislation;
- Ensuring that all the required licences and authorizations from the law have been obtained;
- Should the ER be of the opinion that a serious threat to, or impact on the environment may be caused by the construction/operation activities, he/she may stop work; the proponent must be informed of the reasons for the stoppage as soon as possible;
- The ER has the authority to issue fines for transgressions of basic conduct rules and/or contravention of the EMP;
- Should the Contractor or his/her employees fail to show adequate consideration for the environmental aspects related to the EMP, the ER can have person(s) and/or equipment removed from the site or work suspended until the matter is remedied;
- Attend regular site meetings and inspections as may be required for the ongoing project

8.2 Environmental control officer

The ECO should be a competent individual appointed by the ER. If the ECO lacks occupational safety and health training on the construction site, they should be sent for training. The ER's onsite representative, the ECO, oversees environmental management and the contractor's implementation of the EMP. In the absence of a designated ECO, the ER assumes their responsibilities. The ECO will have the following responsibilities with respect to the EMP implementation:

- To monitor and review the on-site environmental management and implementation of the EMP by the Contractor.
- Assisting the ER in obtaining the appropriate legal authorisations

Maintaining open communication with the ER, Developer, Contractor, and Interested and Affected Parties (I&APs) regarding the EMP and related concerns.

- Conduct monthly site inspections to ensure compliance with the EMP
- Monitor and audit implementation to minimize environmental impacts
- Take appropriate action if specifications are not met
- Assist contractor in finding environmentally responsible solutions
- Provide training to all construction personnel.
- To undertake a continual review of the EMP and recommending additions and/or changes to the document when deemed necessary.

8.3 Contractor

The contractor is in charge of implementing, monitoring, and evaluating the EMP. To achieve effective environmental management, include pertinent sections of the EMP in all outsourced contracts, legally binding all contractors. The contractor will have the following responsibilities with respect to the EMP implementation:

- Adherence, compliance, and implementation of the EMP, onsite monitoring and evaluation of the EMP.
- To ensure that adequate environmental awareness training of senior site personnel takes place and that all construction workers and newcomers receive an induction presentation on the importance and implications of the EMP.
- Maintaining records of all environmental training sessions, including names, dates, and information for ER and ECO inspections and reporting.

9. PLANNING AND DESIGN MANAGEMENT PLAN

9.1 LEGISLATIVE FRAMEWORK

This chapter provides an overview of the legislation and policy framework for the EIA being undertaken. The EIA will be undertaken in compliance with the relevant Namibian environmental legislation as well as taking into account international best practice for impact assessments.

<p>THE CONSTITUTION OF THE REPUBLIC OF NAMIBIA (1990)</p>	<p>There are two clauses contained in the Namibian Constitution that are of particular relevance to sound environmental management practice, articles 91(c) and 95(l). In summary, these refer to:</p> <ul style="list-style-type: none"> • Guarding against over-utilization of biological natural resources; • Limiting over-exploitation of non-renewable resources; • Ensuring ecosystem functionality; • Protecting Namibia’s sense of place and character; • Maintaining biological diversity; and • Pursuing sustainable natural resource use. <p>The above therefore commits the State to actively promote and sustain environmental welfare of the nation by formulating and institutionalizing policies to accomplish the abovementioned sustainable development objectives.</p>
<p>NAMIBIA’S ENVIRONMENTAL MANAGEMENT ACT (EMA)</p>	<p>In giving effect to articles 91(c) and 95(l) of the Constitution of Namibia, general principles for sound management of the environment and natural resources in an integrated manner have been formulated. This resulted in Namibia’s Environmental Assessment Policy of 1994. To give statutory effect to this Policy, the Environmental Management Act was approved in 2007, and gazette on 27 December 2007 as the Environmental Management Act (Act No. 7 of 2007) (EMA), Government Gazette No. 3966. Part 1 of the Environmental Management Act describes the various rights and obligations that pertain to citizens and the Government alike, including an environment that does not pose threats to human health, proper protection of the environment, broadened locus standi on the part of individuals and communities, and reasonable access to information regarding the state of the environment. Part 2 of the Act sets out 13 principles of environmental management, as follows:</p> <ul style="list-style-type: none"> • Renewable resources shall be utilized on a sustainable basis for the benefit of current and future generations of Namibians.

	<ul style="list-style-type: none">• Community involvement in natural resource management and sharing in the resulting benefits shall be promoted and facilitated.• Public participation in decisions affecting the environment shall be promoted.• Fair and equitable access to natural resources shall be promoted.• Equitable access to sufficient water of acceptable quality and adequate sanitation shall be promoted and the water needs of ecological systems shall be fulfilled to ensure the sustainability of such systems.• The precautionary principle and the strategy of preventative action shall be applied.• There shall be prior environmental assessment of projects and proposals which may significantly affect the environment or use of natural resources.• Sustainable development shall be promoted in land-use planning.• Namibia’s movable and immovable cultural and natural heritage, including its biodiversity, shall be protected and respected for the benefit of current and future generations.• Generators of waste and polluting substances shall adopt the best practicable environmental option to reduce such generation at source.• The polluter pays principle shall be applied.• Reduction, reuse and recycling of waste shall be promoted.• There shall be no importation of waste into Namibia.• Promotion of the coordinated and integrated management of the environment;• The Minister of Environment and Tourism was enabled to give effect to Namibia’s obligations under international environmental conventions;• Certain institutions were established to provide for a Sustainable Development Commission and Environmental Commissioner”.
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	<p>As the organ of state responsible for management and protection of its natural resources, the MEFT: DEA is committed to pursuing these principles of environmental management.</p>
<p>ENVIRONMENTAL GUIDELINES</p>	<p>The EMA, under section 5, states that if a proposal is likely to affect people, the following guidelines should be considered in Scoping / EA:</p> <ul style="list-style-type: none"> • The location of the development in relation to interested and affected parties (I&APS), communities or individuals; • The number of people likely to be involved; • The reliance of such people on the resources likely to be affected, the resources, time and expertise available for scoping / EA; • The level of education and literacy of parties to be consulted; • The socio-economic status of affected communities; • The level of organization of affected communities; • The degree of homogeneity of the public involved; • History of any previous conflict or lack of consultation; • Social, cultural or traditional norms within the community; and • The preferred language used within the community. <p>The MEFT also released a Draft Procedures and Guidelines for conducting EIAs and compiling EMPs in April 2008. These guidelines outline the procedures and principles that are to be followed. It will be consulted throughout the EIA process to ensure an effective process and an EMP that addresses all identified impacts.</p>
<p>NAMIBIA VISION 2030</p>	<p>The principles that underpin Vision 2030, a policy framework for Namibia’s long-term national development, comprise the following:</p> <ul style="list-style-type: none"> • Good governance; • Partnership; • Capacity enhancement;

	<ul style="list-style-type: none"> • Comparative advantage; • Sustainable development; • Economic growth; • National sovereignty and human integrity; • Environment; and • Peace and security. <p>Vision 2030 states that natural environments are disappearing quickly. Consequently, 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.</p> <p>Vision 2030 emphasizes the importance of promoting Healthy Living which includes that the majority of Namibians are provided with basic services. The importance of developing Wealth, Livelihood and the Economy is also emphasized by Vision 2030.</p>
<p>BIODIVERSITY LEGISLATION AND POLICIES</p>	<p>The following policies, aimed at biodiversity, may also be relevant for the proposed project:</p> <ul style="list-style-type: none"> • Convention on Biological Diversity (2000) • Namibian Water Corporation Act (1997) • Pollution and Waste Management Bill • Soil Conservation Act (1969) • United Nations Framework Convention on Climate Change (1992) • Water Resources Management Act (2004) • Climate Change Policy (Draft with Attorney General’s office) <p>The applicability of the aforementioned policies and legislation has been explored in further detail during this EIA phase, based on the findings of the impact assessment and specialist investigations.</p>
<p>WATER ACT NO.54 OF 1956</p>	<p>This Act provides for Constitutional demands including pollution prevention, ecological and resource conservation and sustainable utilization. In terms of this Act, all water resources are the</p>

	<p>property of the State and the EIA process is used as a fundamental management tool.</p> <p>A water resource includes a watercourse, surface water, estuary or aquifer, and, where relevant, its bed and banks. A watercourse means a river or spring; a natural channel in which water flows regularly or intermittently; a wetland lake or dam, into which or from which water flows; and any collection of water that the Minister may declare to be a watercourse. Permits are required in terms of the Act for undertaking the following activity relevant to the proposed project:</p> <ul style="list-style-type: none"> • Disposal of wastewater in a manner that may detrimentally impact on a water resource in terms of Section 21 (g).
<p>WATER RESOURCES MANAGEMENT ACT OF NAMIBIA (2004)</p>	<p>This act repealed the existing South African Water Act No.54 of 1956 which was used by Namibia. This Act ensures that Namibia’s water resources are managed, developed, protected, conserved and used in ways which are consistent with fundamental principles depicted in section 3 of this Act. Part IX regulates the control and protection of groundwater resources. Part XI, titled Water Pollution Control, regulates discharge of effluent by permit. Thus, developers are required to efficiently plan for sewage disposal.</p>
<p>POLLUTION CONTROL AND WASTE MANAGEMENT BILL (IN PREPARATION)</p>	<p>This Bill serves to regulate and prevent the discharge of pollutants to air and water as well as providing for general waste management. The Bill will repeal the Atmospheric Pollution Prevention Ordinance (11 of 1976) (below) when it comes into force.</p> <p>Only Parts 2 and 7 of the Bill applies to the project in question for the rezoning of Remainder of Erf 439 Klein Windhoek.</p> <p>Part 2 stipulates that no person shall discharge or cause to be discharged any pollutant to the air from a process except under and in accordance with the provisions of an air pollution license issued</p>

	<p>under section 23. It further provides for procedures to be followed in license application, fees to be paid and required terms of conditions for air pollution licenses.</p> <p>Part 7 states that any person who sells, stores, transports or uses any hazardous substances or products containing hazardous substances shall notify the competent authority, in accordance with sub-section (2), of the presence and quantity of those substances.</p> <p>In terms of water pollution, it will be illegal to discharge of, or dispose of, pollutants into any watercourse without a Water Pollution License (apart from certain accepted discharges).</p> <p>Similarly, an Air Quality License will be required for any pollution discharged to air above a certain threshold.</p> <p>The Bill also provides for noise, dust or odor control that may be considered a nuisance. The Bill advocates for duty of care with respect to waste management affecting humans and the environment and calls for a waste management license for any activity relating to waste or hazardous waste management.</p> <p>This bill aims to promote sustainable development and to prevent and regulate the discharge of pollutants into the environment.</p> <p>Once this bill is enacted it will make provision for the establishment of an appropriate framework for integrated pollution prevention and control.</p> <p>The proposed rezoning exercise would not entail the discharge to air and or water.</p>
<p>PUBLIC HEALTH ACT 36 OF 1919 AND SUBSEQUENT AMENDMENTS</p>	<p>The Act, with emphasis to Section 119 prohibits the presence of nuisance on any land occupied. The term nuisance for the purpose of this EIA is specifically relevant specified, where relevant in Section 122 as follows:</p> <ul style="list-style-type: none"> • Any area of land kept or permitted to remain in such a state as to be offensive, or liable to cause any infectious, communicable or preventable disease or injury or danger to health; or

	<ul style="list-style-type: none"> • Any other condition whatever which is offensive, injurious or dangerous to health. Potential impacts associated with the proposed subdivision of Remainder of Erf 439 Klein Windhoek into Portion A and the Remainder, are expected to include nuisance impacts.
<p>URBAN AND REGIONAL PLANNING ACT 5 OF 2018</p>	<p>The Urban and Regional Planning Act aims to consolidate the laws concerning urban and regional planning and also make provision for the principles and standards of spatial planning. The Act further makes provision for the preparation, approval, review and amendment of zoning schemes, the establishment of townships as well as the subdivision and consolidation of land. Furthermore, a section of the Act institutes the establishment of the Urban and Regional Planning Board which administers the implementation and objectives of the Act.</p>
<p>MUNICIPALITY OF WINDHOEK TOWN PLANNING SCHEME 1997</p>	<p>The purpose of the Town Planning Scheme is to ensure the coordinated and harmonious development of the area of Windhoek in such a way as it will most effectively tend to promote health, safety, order, amenity, convenience and general welfare as well as efficiency and economy and conservation of the existing character of the town.</p> <p>The Municipality of Windhoek’s Town Planning Scheme provides a guideline as to what developments will be acceptable within the boundaries of the town and as it relates to the restrictions placed on the specific property to be developed based on the zoning status of the land in question.</p> <p>In terms of the Town Planning Scheme a change in land use must be advertised, a notice must be placed on site and on the notice board of the Municipality and letters are to be written to adjacent neighbors for their comments. If there are no comments or objections the application is submitted to the Municipality of Windhoek for approval where after the amendment is included in a Town Planning Amendment Scheme. In terms of the Town</p>

	<p>Planning Scheme, there are certain regulations pertaining to zoned erf in terms of land uses that may be permitted as well as building lines and height restrictions that must be adhered to. Any land uses not permitted under the table 3 of the Town Planning Scheme at the specific zone will require a new rezoning application.</p>
<p>LOCAL AUTHORITIES ACT 23 OF 1992</p>	<p>The Local Authorities Act prescribes the manner in which a town or municipality should be operated by the Town or Municipal Council. In this case the Local Authorities Act section 50 prescribes certain regulations pertaining to the closure of public open spaces and streets where such a closure must be advertised for comments/ objections.</p> <p>As per the local Authorities Act, the closure of public open spaces must be advertised, a notice must be placed on site and neighbors need to provide consent.</p>

9.2 CONSTRUCTION PHASE AND MITIGATION MEASURES

The following table provides an overview of the generic and site-specific themes and mitigating measures to be implemented as part of the construction component of the EMP to be undertaken within

Table 2: Generic and site-specific environmental management actions for the construction phase

THEME	MITIGATING MEASURES
Waste management	Reduce and steer clear of any waste pollution linked to construction.
Borrow pits	Ensure topsoil protection and post-construction rehabilitation.
Health and safety	Prioritising the health and safety of workers and the surrounding community during construction.
Dust and noise	Minimise noise and dust from the construction process.

Environmental training and awareness	Raising awareness about the EMP and the need to protect environmental resources.
Environmental conservation	Minimise the activity's impact and safeguard the social setting in which it is taking place.
Employment/ Recruitment (Staff management)	Ensure the protection of workers' rights and safety in Namibia and minimise negative conflict through legal and fair recruitment practices
Stakeholder communication	Provide a platform for stakeholders to raise grievances and receive feedback and hence minimise negative conflict
Socio-economic and Miscellaneous	Ensure consideration is given to matters regarding the cultural and general wellbeing of the affected community and matters incidental.

SECTION A: WASTE MANAGEMENT

Waste management plan	The Contractor should compile a Waste Management Plan. The WMP must address measures for the use and disposal of general waste and hazardous waste at the site
General waste	<p>The building site should be kept clean at all times. General construction waste should be cleaned and contained daily.</p> <p>To ensure safety, waste cannot be buried, burned, or deposited in watercourses.</p> <p>Separate waste containers for hazardous and domestic/general waste must be supplied on-site.</p> <p>To prevent littering, construction workers should be educated on proper garbage disposal and clearly designated areas.</p>

	<p>After the project is finished, no waste may stay on the property.</p>
<p>Hazardous waste</p>	<p>A drip tray ought to be installed on all major fuel-powered equipment and heavy construction trucks on the property.</p> <p>Drip trays must be brought with vehicles wherever they go on the construction site in case it is believed that the vehicle being utilised has an oil leak.</p> <p>Every day cleaning of drip trays and handling, storing, and disposing of spills as hazardous waste are recommended.</p> <p>Wet concrete spills should be handled like garbage and disposed of in the proper trash containers before the end of each day.</p> <p>Because of its high alkalinity concentration, raw unbound cement (dry) and cement-infused mixer water are categorised as hazardous waste. The same procedures as for hazardous waste would apply, and it should be disposed of in the proper containers marked with that name.</p> <p>Onsite storage of a hazardous waste spill clean-up kit and periodic restocking of its supplies are recommended. The following supplies will be included in the kit (the ER will determine how many of each item to include):</p> <ul style="list-style-type: none"> - Dust masks, heavy-duty gloves, sturdy plastic bags, medium-sized shovels, and a biodegradable hand wash (degreasing) product - It is necessary to designate a storage space for any hazardous materials or chemicals (such gasoline, etc.). The storage space needs to have an impermeable surface that is sealed, ready for usage and eventual disposal.
<p>Sewage Waste</p>	<p>Avoid letting sewage (black water) spill straight onto the ground.</p> <p>Every type of sewage needs to be routinely collected and disposed of at an approved municipal sewage treatment plant.</p>

SECTION B: BORROW PITS

ASPECTS	MITIGATION MEASURE
Topsoil	The Contractor should adhere to stipulated measures arising from the borrow-pit research and the design for excavations and the disposal of spoil material
Rehabilitation	<p>Borrow pits may only be backfilled with clean or inert material. No hazardous material (such as sand collected from an oil spill) may be used as backfill.</p> <p>Borrow pits that have been rehabilitated have to match to the existing landscape contours.</p> <p>Topsoil is to be evenly distributed over borrow pit regions.</p> <p>Rehabilitated borrow pits must remain fenced off once the project is decommissioned.</p>

SECTION C: HEALTH AND SAFETY

ASPECTS	MITIGATION MEASURE
HIV/AIDS and TB training	The Contractor should approach the Ministry of Health and Social Services to co-opt a health officer to facilitate HIV/AIDS and TB education programmes periodically on site during the construction phase.
Road Safety	<p>All vehicles that transport materials to and from the site must be road worthy.</p> <p>Drivers that transport materials should have a valid driver’s license and should adhere to all traffic rules.</p>

	<p>Loads on vehicles should be properly secured to avoid items falling off the vehicle.</p>
<p>Safety Around Excavated and Work Areas</p>	<p>Excavations should be left open for an absolute minimum time.</p> <p>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.</p> <p>Borrow pits are to be fenced off with steel wire fencing.</p> <p>Work areas must be set out and isolated with danger tape daily.</p> <p>All building materials and equipment are to be stored only within set out and demarcated work areas.</p> <p>Only construction personnel will be allowed within these work areas.</p>
<p>Ablution Facilities</p>	<p>Separate temporary ablutions (toilet and shower) should be available for men and women and should clearly be indicated as such.</p> <p>Portable toilets (i.e., easily transportable) should be available</p> <p>Sewage waste must be taken to an authorised (municipal) sewage disposal site on a regular basis. Pump it into sealable containers and store it until it's time to remove it. Workers responsible for cleaning the toilets should be provided with latex gloves and masks</p>

Others	<p>If employees complain about dust, they should be given dust protection masks.</p> <p>Employees should have access to potable water.</p> <p>Smoking should not be permitted near fuel storage facilities or portable restrooms (if the restrooms use chemical toilets, as the chemicals might catch fire).</p>
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	It should not be permitted for employees to consume alcohol while on the job.
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SECTION D: DUST AND NOISE

ASPECTS	MITIGATION MEASURE
Dust	When there is the most vehicle traffic on gravel roads—especially in dry, windy conditions, a watering truck should be utilised.
Noise	When heavy equipment is being used in construction, the hours of operation should be limited to 0800–1700.

SECTION E: ENVIRONMENTAL TRAINING AND AWARENESS

ASPECTS	MITIGATION MEASURE
Environmental Induction (Training)	<p>All construction personnel are required to undertake environmental induction (training), which should include at least the following:</p> <ul style="list-style-type: none"> Explaining the significance of EMP compliance. Discussion of the probable environmental effects of construction activity. Employee duties and obligations, including emergency preparedness. Explanation of the mitigation measures that must be undertaken as work groups carry out their various tasks. Explanation of the precise mitigating methods within this EMP, particularly the unfamiliar provisions.

<p>Environmental Monitoring and auditing</p>	<p>The contractor must confirm that all necessary programmes, legislation, rules, and policies are adhered to and abide by, and that specifications are implemented in an effective and proper manner in accordance with the developed environmental monitoring programmes.</p>
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SECTION F: ENVIRONMENTAL CONSERVATION

<p>ASPECTS</p>	<p>MITIGATION MEASURE</p>
<p>Conservation of vegetation</p>	<p>Disturbance of areas outside the designated working zone is not allowed.</p> <p>It is the responsibility of the ECO to ensure that no animal (if there's any) is to be killed, trapped, removed, or interfered by the Contractor together with his workers (employees).</p> <p>The Contractor must ensure that no domesticated animals are brought along on sight.</p> <p>All invasive plants must be removed from the site and burned in a controlled environment.</p> <p>No vegetation outside of the demarcated areas may be removed.</p> <p>No major impacts are expected from the proposed development during the operational phase.</p>

SECTION G: EMPLOYMENT/RECRUITMENT

ASPECTS	MITIGATION MEASURE
Legislation	Adhere to the legal provisions in the Labour Act see Table 2.

SECTION H: STAKEHOLDER COMMUNICATION

ASPECTS	MITIGATION MEASURE
Communication plan	<p>The contractor should create a communication strategy that includes at least the following:</p> <p>How stakeholders that require continuing contact during the construction phase will be identified and documented, as well as who will monitor and update this data.</p> <p>How will these stakeholders be regularly consulted?</p> <p>Make provisions for grievance processes, such as how complaints can/will be filed/recorded and feedback provided, as well as subsequent stages of arbitration if input is judged unsatisfactory.</p>
General communication matters	<p>The ER must appoint an ECO to facilitate communication between the Contractor, stakeholders, and consultants. The chosen Contractor shall appoint a member of the construction team to be responsible for the implementation of all provisions of this EMP.</p> <p>At each site meeting, the Contractor should report on the progress of the execution of all EMP requirements.</p> <p>The Contractor should carry out the environmental awareness training outlined in Section E.</p>

	<p>The Contractor must include the project's stakeholders and their contact information with whom continuing communication will be necessary during the length of the contract. Before construction starts, the list and the Communication Plan need to be approved and delivered to the ER.</p> <p>All correspondence with the interested parties has to go via the ECO.</p> <p>Every stakeholder should be able to obtain a copy of the EMP at the site office.</p> <p>It is necessary to invite key individuals from the aforementioned list to monthly site meetings so they may voice any worries or reservations about the status of the project.</p>

SECTION I: SOCIO-ECONOMIC AND MISCELLANEOUS

ASPECTS	MITIGATION MEASURE
<p>Archaeology</p>	<p>If an archaeological or heritage site is unearthed or found during the project's building phase, the following procedures for "chance find" should be followed:</p> <p>If using equipment or machinery, cease working.</p> <p>Use hazard tape to mark the area.</p> <p>Find your GPS position and report results to the foreman.</p> <p>Report the site's location, results, and actions to the superintendent.</p> <p>Put an end to any construction going on nearby.</p> <p>Check the location to see if work can continue without causing harm to the findings.</p>

	<p>Establish the exclusion limit and mark it.</p> <p>The project's Geographic Information System (GIS) will be updated with the site's location and specifics so that an archaeologist can validate it in the field. Inspect site and confirm addition to project GIS.</p> <p>Notify the National Heritage Council (NHC) and ask for authorization in writing to remove the discoveries from the work area.</p> <p>Findings are recovered, packaged, and labelled in preparation for transport to the National Museum.</p> <p>In the event that human remains are discovered, the following steps must be taken:</p> <p>Use the chance find process in the manner previously mentioned.</p> <p>To verify that the remains are human, arrange for an archaeologist to conduct a field investigation.</p> <p>Communicate and liaise with the Police and NHC; and</p> <p>The National Forensic Laboratory or the National Museum will receive the found remains.</p>
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SECTION J: OPERATION AND MAINTANANCE PHASE

Table 3: Operation and maintenance phase

ASPECTS	MITIGATION MEASURE
EMP implementation	Sakhiwo Health Solutions, Remainder of Erf 439 Klein Windhoek
Sewage pipelines	To identify and stop water pollution, sewage pipes and leaks should be regularly maintained and monitored.

Post-construction usage	The topsoil and restoration procedures specified in the construction mitigation methods of this EMP above should be followed by borrow pits that are to be used after construction.
Post-construction environmental training and awareness	It is the responsibility of all contractors hired to do maintenance on the corresponding services infrastructure to guarantee that all employees are informed on the health, safety, and environmental factors that are relevant to their specific tasks.

10. DECOMMISSIONING PHASE

It is unlikely that the road will be dismantled in the near future because of its future use. Should the Municipality of Windhoek decide in not utilizing the Portion A which will be used to extend Schultz Street, it shall not be demolished. It will be made accessible to, or so to the nearby property owners. It is more likely that the removal of the infrastructure would negatively impact the environment than abandonment.

11. CONCLUSION

In conclusion, this document is submitted for the subdivision of the Remainder of Erf 439 Klein Windhoek into Portion A and the Remainder. Portion A will be transferred to the Municipality of Windhoek in order to extend an existing street (Schultz Street). There will be minimal construction to take place and therefore minimal environmental impacts.

Lastly, it should be highlighted that this EMP should be seen as a living document, with updates made as needed to reflect project progress while maintaining the basic concepts and goals on which the document is founded. This EMP was compiled with effects and mitigation methods in mind, as well as best practice standards for environmental management. Furthermore, as long as the operational implications of this project are reduced in accordance with the EMP, the project should have no negative environmental impact. It is the proponent's obligation to make this EMP a legally binding document for the contractor by putting it in the contract agreement.

The corporate management should get extensively aware with the EMP's requirements and select an

Environmental Control Officer (ECO) to monitor the EMP's day-to-day implementation (if necessary). Parties who violate this EMP should be held liable for any necessary rehabilitation. Parties liable for environmental deterioration due to reckless behaviour/negligence should face consequences.

