

CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN (CEMP) FOR THE PROPOSED TELECOMMUNICATION TOWER

PROJECT LOCATION

Masida Village, Linyati Constituency, Zambezi Region.



PREPARED FOR



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DOCUMENT INFORMATION

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LIST OF ACRONYMS

BID:	Background Information Document
CDC:	Community Development Committee
CEMP:	Construction Environmental Management Plan
CLB:	Communal Land Board
DEA:	Directorate of Environmental Affairs
DoF:	Directorate of Forestry
EAP:	Environmental Assessment Practitioner
ECC:	Environmental Clearance Certificate
ECO:	Environmental Control Officer
EIA:	Environmental Impact Assessments
EMA:	Environmental Management Act
GN:	Government Notice
HIV/AIDS:	Human Immunodeficiency Virus / Acquired immunodeficiency syndrome
I&APs:	Interested and Affected Parties
ICT	Informal Communication Technology
MAWFLR:	Ministry of Agriculture, Water, Fisheries and Land Reform
MEFT:	Ministry of Environment, Forestry, and Tourism
MoHSS:	Ministry of Health and Social Services
MTA:	Mafwe Traditional Authority
NHC:	National Heritage Council
NORED:	Northern Regional Electricity Distributor
NSA:	Namibia Statistic Agency
PPE:	Personal Protective Equipment
SABS:	Southern Africa Bureau of Standards

1. INTRODUCTION AND BACKGROUND

1.1 Introduction

PowerCom (Pty) Ltd, hereinafter referred to as the proponent, intends to construct a new telecommunications tower in Masida Village, located within the Linyati Constituency of the Zambezi Region. The proposed project is part of the company's comprehensive mandate and strategic plan to increase its footprint and asset base in underserved areas with weak or no network coverage. The tower will be a ready-to-use infrastructure for telecommunication service providers, targeting service providers and operators to enhance network coverage and deliver informal communication technology (ICT) services to their clients.

The construction of the proposed telecommunication tower will trigger certain activities, listed under No. 10 (10.1) of Schedule 1 of the EIA Regulations (GN No. 30 of February 2012); therefore, it cannot be carried out without an EIA being undertaken. Green Gain Consultants cc has been appointed as an independent Environmental Assessment Practitioner (EAP) by PowerCom to conduct an Environmental Impact Assessment (EIA) for the proposed construction of the telecommunication tower.

The EIA focused primarily on the construction phase of the project, resulting in the preparation of the Construction Environmental Management Plan (CEMP). The CEMP was prepared in line with Section 8 (j) of the EIA Regulations (GN 30 of February 2012), and the proponent's terms of reference. The CEMP contains aspects of the proposed management and mitigation measures to be taken to address the negative environmental impacts and enhancement measures for the positive environmental impacts identified in the environmental scoping report. It also addresses the need for compliance monitoring of identified significant environmental impacts.

The CEMP is not a standalone document; thus, it must be read in conjunction with the Scoping report. The CEMP is a legally binding document between the proponent and Ministry of Environment, Forestry and Tourism (MEFT) and implementation of the recommended management actions is mandatory.

1.2 Scope of Construction works

It is expected that the construction of the proposed telecommunication tower will likely include the following scope of work.

1.2.1 Site preparation

Clearing of vegetation (bushes and trees) along the site access road as well as clearance of vegetation from the construction site and laydown area.

1.2.2 Civil works

This includes excavations and construction of foundations and supporting infrastructure

1.2.3 Mechanical and structural

The tower infrastructure will be prefabricated as modular sections and transported to site flat-packed using flatbed trucks or heavy-duty trucks. The mechanical work onsite will include; assembling, bolting and erecting the modular components of the tower.

1.2.4 Installations

The tower will be connected to the grid from the existing powerline. The tower will be suitable to install multiple antennas by independent operators.

1.3 Objectives of the CEMP

This CEMP has been compiled for the management of potential environmental impacts during the construction of the proposed tower infrastructure. The CEMP also includes best practices for the generic issues of construction management and supervision.

The specific objectives of this CEMP are:

- Present measures to avoid, lessen and mitigate adverse impacts on various environmental components, and enhance the value of environmental components where possible.
- Define the roles and responsibilities for different role players
- Explain the need for compliance with regulatory provisions and guidelines.
- Explain procedures for compliance monitoring
- Present procedures for the possible decommissioning and required environmental rehabilitations.

2. ROLES AND RESPONSIBILITIES

2.1 Project involvement

The implementation of the CEMP requires various role players, each with specific responsibilities to ensure that the proposed infrastructure is planned and designed, constructed, operated, and maintained in an environmentally sound manner.

Table 1: Project team

NO.	SPECIFIC PROJECT ROLE	ADDRESS AND CONTACTS
1.	Proponent	PowerCom (Pty) Ltd. P. O. Box 40799, Windhoek 140 NPTH Building no.4, Julius K. Nyerere Street Environmental Control Officer Name:..... Contact number Signature..... Date:.....
2.	Environmental Assessment Practitioner (EAP)	Green Gain Consultants cc Lead Environmental Practitioner Mr. Joseph Amushila Cell: +264811422927 Email: info@greengain.com.na
3.	Regulatory Authority	Ministry of Environment, Forestry and Tourism (MEFT) Private Bag 1338, Windhoek Erf 842 Dr. Kenneth Kaunda Street
4.	Contractor	Please complete details here

2.2 Responsible Parties

2.2.1 Proponent (PowerCom)

The Proponent will play a pivotal role to ensure the successful implementation by designating a Project Manager and an Environmental Control Officer to perform the following tasks.

a) Project Manager (PM)

The PM is responsible for driving the project from the initial site survey to structural completion, ensuring it meets strict timelines, budgets, and compliance standards. The PM is also responsible for the supervision of the contractor and sub-contractor and conducting routine site inspections to ensure the tower meets exact engineering tolerances and quality standards.

b) Environmental Control Officer (ECO)

- Take disciplinary actions in cases of transgressions and non-compliance.
- That all environmental impacts are managed according to the environmental principles of avoiding, minimizing, mitigating, and rehabilitation as contained in this CEMP.
- Appropriate compliance monitoring is executed as outlined in Section 7
- Handle grievances in the as received.
- That a copy of this CEMP is always kept on site.
- Keep a record of emergencies and take corrective actions
- Handle grievances received

2.2.2 Environmental Assessment Practitioner (EAP)

The EAP in collaboration with the PowerCom internal team, is responsible for the compilation of an Environmental Scoping Report and CEMP and submission of such reports to the competent authority (DWA) as well as the regulatory authority (MEFT). In addition, the EAP will apply for the Environmental Clearance Certificate (ECC) on behalf of the proponent.

2.2.3 The contractor and sub-contractors

It is expected that various contractors and sub-contractors will be appointed during the construction phase. All appointed contractors and sub-contractors involved in the project shall ensure compliance with the CEMP and its conditions, thus the RE and Project Manager (PM) must ensure that a copy of the CEMP is given to all contractors involved. The contractor upon receiving this CEMP, should ensure compliance to this CEMP by:

- Undertaking their activities in an environmentally sensitive manner and within the context of this CEMP.
- Undertaking good housekeeping practices during the duration of their activities.
- Ensuring that adequate environmental awareness training takes place in the language best understood by the Employees.
- Keeping a record of emergencies and taking corrective actions
- Taking appropriate disciplinary actions against their employees in case of transgression.

3. ENVIRONMENTAL MANAGEMENT REQUIREMENTS

The successful implementation of this CEMP will depend on various factors such as training and awareness, enforcement, good record keeping, and reporting.

3.1 Environmental awareness training

It is important to ensure that contractors, and sub-contractors involved in the construction of the proposed telecommunication tower have the appropriate level of environmental awareness and competence to ensure continued environmental due diligence and minimization of environmental harm. To achieve this, all parties involved during the construction should be briefed on their obligation towards environmental protection in terms of the CEMP before any work commences. The training should also cover the actions outlined in the emergency response plan.

3.1.1 Construction phase

As part of tender requirements, contractors are obliged to educate their employees on the implementation of the CEMP. Every contractor should provide training to their employees regarding environmental issues related to construction. Training can be conducted via an onsite session before the commencement of any work. employee's information posters, outlining the environmental "do's" and "don'ts" (as per the environmental awareness training course) should be placed at project site.

3.2 Recordkeeping

There should be an updated filing system for the project, where method statements, environmental incidents reports, training records, audit reports, and public complaints register are kept. It is advised that photographs of the site should be taken as a visual reference. The grievance register must be kept by the project during the construction phase.

3.3 Enforcements

This CEMP upon approval by MEFT shall be a legally binding document, thus, the commitment and co-operation of the identified responsible person(s) will ensure effective implementation of the CEMP. Adherence to this CEMP will ensure that the environmental impacts associated with the project will be mitigated to a greater extent thus promoting sustainable development. The CEMP will be enforced in accordance with the provisions of Section 8 (j) of the Environmental Management Act 07 of 2007 through a contract between PowerCom and the contractor.

3.3.1 Method statements

The method statements are required especially during the construction phase to describe the scope of work intended by the contractor. This should be provided in a step-by-step description for the PM and ECO to understand the contractor's intentions. This will enable them to assist in devising any mitigation measures, which would minimize environmental impact during these tasks. The method statements should also clearly stipulate mitigation methods of the intended works, against which the contractor's performance will be measured. In this case, the following method statements will be necessary during the construction phase:

- Details of the construction camps.
- Construction procedures.
- Materials and equipment to be used.
- How and where materials will be stored.
- The containment of accidental leaks or spills as prescribed by this CEMP
- Timeline and location of activities; and
- Any other information deemed necessary by the ECO/PM.

The contractor must submit the method statement two weeks before the commencement of any construction activity. Work may not commence until the method statement has been accepted by the PM and ECO and communicated to the workforce. The contractor shall, except in the case of emergency activities, allow 14 days for consideration and approval of the method statement. The PM or ECO may require changes to the method statement if the proposal does not comply with the specifications or if, the proposal may result in damage to the environment more than that permitted by the specifications. Approved method statements shall be communicated to all relevant personnel.

3.3.2 Non-compliance and disciplinary actions

In cases of transgressions and non-compliance to the CEMP, the following actions may be taken against the transgressor.

- Disciplinary actions
- Legal actions
- Termination of contract

The PM in collaboration with the designated ECO will ensure that the CEMP is fully complied with by the appointed contractor and employees during the construction phase. The PM and ECO shall issue disciplinary actions based on the severity of the environmental damages and the nature and extent of the transgression/non-compliance. In addition, the proponent may also institute legal actions against the transgressor i.e., withholding of the contract retention money from the contractor until the transgression is rectified or terminate the entire contract for non-compliance, in line with the Public Procurement Act 15 of 2015 and PowerCom contract agreement.

3.4 Environmental reports

The ECO shall prepare a completion report upon the completion of the construction phase. The completion report should indicate the environmental performance, compliance to the CEMP, and matter of incidental.

Furthermore, the proponent shall ensure regular monitoring of project activities during all project phases and keep records. These records may be required by the competent authority when deemed necessary or for the renewal of the ECC if the project is not complete within three years. The records will be required when applying for renewal of the ECC and the proponent will also have to indicate how the CEMP was adjusted to make provision for improved mitigation measures and action plans.

4. LEGAL REQUIREMENTS

The CEMP implementation shall be guided by the legislative framework as outlined in the scoping report and briefly presented in the table below.

Table 2: Applicable National Laws

LEGISLATION	PROVISION AND REQUIREMENTS
Constitution of the Republic of Namibia (1990)	<p>Articles 91 (c) commands the state to actively promote and sustain the environmental welfare of the nation by formulating and institutionalizing policies to accomplish the sustainable objectives which include:</p> <ul style="list-style-type: none"> • Guarding against overutilization of biological natural resources, • Limiting over-exploitation of non-renewable resources, • Ensuring ecosystem functionality, • Protecting Namibia’s sense of place and character. • Maintain biological diversity. • Pursuing sustainable natural resource use. <p>Article 95(i) recites: “The State shall actively promote... maintenance of ecosystems, essential ecological processes and biological diversity of Namibia and utilization of living natural resources on a sustainable basis for the benefit of all Namibians, both present and future”.</p>
Pollution Control and Waste Management Bill, 2003	<p>This Bill serves to regulate and prevent the discharge of pollutants to air and water as well as provide for general waste management.</p> <p>The bill provides a framework for a multitude of administrations on pollution control and waste management in the country.</p>
Environmental Management Act No. 07 of 2007	<p>Ensuring that the significant effects of activities on the environment are considered carefully and in time. To promote the sustainable management of the environment and the use of natural resources by establishing principles for decision-making on matters affecting the environment.</p> <p>Of relevance to this project are the following listed activities, as provided in Section 27 of the Environmental Impact Assessment Regulations of 2012, which includes:</p>

	Schedule 10 (10.1 (g) “the construction of Communication networks including towers, telecommunication and marine telecommunication lines and cables”
Water Act 54 of 1956 and Water Resources Management Act 11 of 2013	<p>The Water Resources Management Act 11 of 2013 is present without regulations; therefore, the Water Act 54 is still in force. The Act provides for the management and protection of surface and groundwater resources in terms of utilization and pollution.</p> <p>This Act further provides provision for the control, conservation, and use of water for domestic, agricultural, urban, and industrial purposes. In addition, the Act gives provisions that pertain to license or permit that required abstracting and using water as well as for discharge of effluent.</p>
Soil conservation Act 76 of 1969	The objectives of the Soil Conservation Act 76, 1969 are to make provision for the combating and prevention of soil erosion, and the conservation, protection, and improvement of the soil, the vegetation, and the sources and resources of the water supplies.
Nature conservation Ordinance of 1975.	The Nature Conservation Ordinance Section 14 protects and preserves wild animal life, fisheries, wild plant life and objects of geological, archaeological, historical and other scientific interest and for the benefit and enjoyment of the inhabitants of Namibia.
Hazardous Substance Ordinance of 1974	This Ordinance provides for the control of toxic substances and is thus also relevant for pollution control. It covers the manufacturing, sale, use, disposal, dumping, importing, and exporting of hazardous waste.
Labour Act (No 11 of 2007)	<p>The Objectives of the National Labour Act are:</p> <ul style="list-style-type: none"> • To establish a comprehensive labour law for all Employers and Employees; to entrench fundamental labour rights and protections. • Regulate basic terms and conditions of Employment. • To ensure the health, safety, and welfare of Employees; to protect Employees from unfair labour practices.

	<ul style="list-style-type: none"> • To regulate the registration of trade unions and Employers' organizations; to regulate collective labour relations. • To provide systematic prevention and resolution of labour disputes.
Public Health and Environmental Act, 2015	<p>The objectives of the PHE Act are to.</p> <ul style="list-style-type: none"> • Promote public health and wellbeing. • Prevent injuries, diseases, and disabilities. • Protect individuals and communities from public health risks. • Encourage community participation to create a healthy environment. <p>Provide for early detection of diseases and public health risks.</p>
Employment Service Act 8 of 2011	To provide for the establishment of the National Employment Service; to impose reporting and other obligations on certain Employers and institutions; to provide for the licensure and regulation of private Employment agencies, and to deal with matters incidental thereto.
Atmospheric Pollution Prevention Ordinance 11 of 1976	To provide for the prevention of the pollution of the atmosphere and matters incidental thereto. The Ordinance deals with administrative appointments and their functions; the control of noxious or offensive gases; atmospheric pollution by smoke, dust control, motor vehicle emissions; and general provisions.
Pollution Control and Waste Management Policy, 2003	The bill provides a framework for a multitude of administrations on pollution control and waste management in the country. Each authority identified by the bill shall play its respective role.
Basel and Rotterdam Convention, Framework Convention on Climate Change	Agreed to ensure environmentally sound management of hazardous waste and other wastes through the reduction of their movements, to reduce their impacts on human health and the environment.
Stockholm Convention on Persistent Organic Pollutants	Emphasizes the restriction and elimination of persistent organic pollutants especially the disposal of industrial and medical chemicals. It also provides information for future establishments to re-use, reduce and recycle waste with environmentally friendly technologies e.g., autoclaving. It was adopted in 2001 and entered into force on May 17, 2004.

MEFT Policy on HIV & AIDS	MEFT has recently developed a policy on HIV and AIDS. In addition, it has also initiated a program aimed at mainstreaming HIV and gender issues into environmental impact assessments.
Forestry Act No. 12 of 2001	The Act provides for the management and use of forests and related products / resources. It offers protection to any living tree, bush or shrub growing within 100 metres of a river, stream or watercourse on land that is not a surveyed erf of a local authority area. In such instances, a licence would be required to cut and remove any such vegetation. These provisions are only guidelines.
National Heritage Act No. 27 of 2004	The Act is aimed at protecting, conserving, and registering places and objects of heritage significance.
Roads Ordinance 17 of 1972 and its amendments	<ul style="list-style-type: none"> • 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.
Civil Aviation Act No. 6 of 2016	<p>Under the Civil Aviation Act No. 6 of 2016, telecommunication towers and similar structures require assessment by the Namibia Civil Aviation Authority (NCAA) if they pose a threat to aviation safety, particularly by interfering with aerodrome obstacle limitation surfaces or air traffic monitoring. Relevant requirements of this Act are such as</p> <p>Any tall structure erected near an aerodrome (typically within an 8 to 15 km radius requires authorization by the Namibian Civil Aviation Regulations).</p>
Communications Act, 2009 (Act No. 8 of 2009)	(10) The Authority may impose specific obligations and requirements on a licensee regarding to masts, towers or other facilities including requirements relating to the environmental or aesthetic impact of such facilities;

5. MANAGEMENT OF IDENTIFIED IMPACTS

This section outlines the proposed mitigation measures to avoid, prevent and mitigate and/or enhance the identified potential impacts associated with the proposed construction of a telecommunication tower. It also outlines the responsibilities of each party involved in the project implementation during the construction phase.

5.1 Environmental specifications

The following specifications cover the requirements for controlling the impact of construction activities on the natural and social environment. Although the specifications below apply during the construction phase, many of the activities are similar to the operation, maintenance, and decommissioning activities, hence, these specifications, where applicable will apply to these project phases as well.

5.1.1 Construction camp

It is recommended that a suitable location to establish a construction camp should be selected. The contractor should provide a method statement detailing the location, layout, lay-down yard, batching area, fuel storage, and other infrastructure. All construction vehicles should be parked at the dedicated parking area, and no vehicle should be parked outside the designated area.

5.1.2 Cement and concrete batching

The permitted location of a batching plant (including the location of cement stores and sand and aggregate stockpiles) shall be indicated on the Site layout plan and approved by the ECO or PM. Concrete shall not be mixed directly on the ground. Materials that can be used for this purpose are such as boards, plastic sheeting, or other protective materials.

5.1.3 Access route

The existing roads should be used as far as possible. No off-road driving should be allowed. Notices should be placed on visible locations in the vicinity of the construction site to warn the public of construction activities and indicate that heavy vehicles may be using the road. Contractor/s shall control the movement of all vehicles and plant machinery so that they remain on designated/demarcated routes. Any temporary roads required shall be decommissioned by the contractor/s and rehabilitated using stockpiled topsoil.

5.1.4 Earthwork and trenching

Earthworks are to be phased so that no areas are left exposed for longer periods than necessary. This is especially important during the rainy season where runoff causes siltation downstream & overall erosion and loss of topsoil, etc. Trenches shall be re-filled to the same level as (or slightly higher to allow for settlement) the surrounding land surface to minimize erosion.

5.1.5 No-go areas

All areas outside the construction site (80m²) and not in the immediate vicinity of construction area should be considered as a 'no go' areas. The Contractor shall ensure that no unauthorized entry, stockpiling, dumping or storage of equipment or materials shall be allowed within the "no go" areas.

5.2 Proposed mitigation measures: Construction phase

Table 3: Potential negative impacts and proposed mitigation measures during the construction phase

Environmental Issue/Impacts	Source of Impact	Mitigation Measures	Responsibility/Control
Traffic and vehicle impacts	Transportation of prefabricated tower infrastructure to the construction site.	<p>-If the prefabricated tower sections exceed 2.9 meters in width, 18.65 meters in rigid length, or standard axle limits, you will need to secure an Abnormal Load Permit and potentially escort vehicles.</p> <p>-Vehicles should be driven by authorized legally drivers and at the designated speed limits.</p>	Contractor/PM
Disturbance to local flora and fauna	<ul style="list-style-type: none"> - Construction activities will cause vegetation clearance and disturb natural habitats, especially for small insects and ground burrowing animals. - Disturbance to vegetation may also occur because of vehicle movement and off-road driving. 	<ul style="list-style-type: none"> - Obtain approval from the local DoF before commencing with vegetation clearance. - The existing access route should be used as far as possible. - Avoid trapping of small animals and injury to any animal crossing or found on site. - Provide barricades around uncovered trenches to ensure the safety of animals and people. 	Contractor/ECO
Soil disturbances and contamination from bulk earthworks and civil works	<ul style="list-style-type: none"> - The excavation of trenches and movement of construction vehicles will disturb the organisms in the soil and expose the soil to wind erosion. - Soil may also be contaminated from leaks and spills from construction 	<ul style="list-style-type: none"> - Topsoil must be carefully extracted and kept separate from construction waste for use as backfill materials. - Limit the movement of vehicles to the construction working site and make use of existing access routes. 	Contractor/ECO

	<p>vehicles and improper chemical handling.</p>	<ul style="list-style-type: none"> - Vehicle movement should be restricted to within the designated access road. - Vehicles & equipment with leaks should be equipped with drip trays to prevent oil and fuel spillages. - Ensure proper maintenance of the construction vehicles and machinery. - In the event of spillages, it should be reported to the ECO and PM immediately and cleaned as soon as possible, follow the spillage handling procedure presented in Error! Reference source not found., response action during substance spillage. - Contaminated sand must be collected and disposed of at the nearest dumpsite. 	
<p>Damage to geological resources</p>	<ul style="list-style-type: none"> - The alteration of topography due to excavations and bulk earthworks may disturb the surface geological settings. 	<ul style="list-style-type: none"> - The disturbance of soil and geology during construction is inevitable. However, all site disturbances should be limited to the areas where structures will be constructed. - Stockpiles generated onsite must be used as backfilling materials rather than regarded as waste materials. 	<p>Contractor/ECO</p>

<p>Fuel and lubricants spill or leaks at construction, refuelling, and storage sites</p>	<ul style="list-style-type: none"> - The poor handling and spillage of fuel, lubricants, and chemicals i.e., oil, grease from construction vehicles could contaminate the soil, surface water, and groundwater. 	<ul style="list-style-type: none"> - There is a need for proper handling and storage of oil and fuel to ensure environmental protection. - The PM shall provide specifications for storage of all oils and fuels (secondary containment etc.) and procedures for refuelling vehicles, plants, and equipment. - All leakages and spillages of oil and grease should be contained, cleaned up, and disposed of at the nearest dumpsite. - In the event of a hazardous spill: <ul style="list-style-type: none"> o Immediately implement actions to cease operations or reduce the spill. o Contain the spill. o Arrange implementation of the necessary clean-up procedures. o Collect contaminated soil, water and other materials and dispose of at nearest dumpsite. - Drip trays should be provided for vehicles and machines with leakages. - All construction vehicles must be serviced at the maintenance workshop, and no offsite maintenance should be allowed. - A spill kit must be available at the construction site and there must be at least one person with appropriate authority who is trained in hazmat response. 	<p>Contractor/ECO</p>
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		<ul style="list-style-type: none"> - Refuelling vehicles should be equipped with specific vehicle spill kits - If refuelling is to be done onsite, a bunding wall, big enough to contain 120% of the volume of the fuel tank should be constructed at fuel storage and transfer site/s. - Fire extinguishers must be available at all refuelling sites. Staff should be trained to handle such equipment. - Above ground fuel tanks should be on an impervious floor with bunding walls 	
Dust and air pollution	<ul style="list-style-type: none"> - Excavation and construction-related activities i.e., cement mixing and backfilling will generate fugitive dust that will have a negative impact on the surrounding area and beyond. However, the worst case of dust pollution would be during windy conditions. - Trucks transporting construction material and construction residues to the dumping site will cause dust pollution to streets they would be passing through. 	<ul style="list-style-type: none"> - Employ dust control measures such as: <ul style="list-style-type: none"> • Sprinkler all haulage roads and construction areas with water. • Mixing of cement should be done with a concrete mixture or in an enclosed space. • Trucks transporting construction materials such as sand and stones should be covered with a tarpaulin. • Ensure proper maintenance of vehicles and equipment to minimize the release of fumes and other pollutants in the air. • All vehicles should be driven at a minimum speed limit of 60 km/hr in town and all construction vehicles and machinery must be roadworthy. • When the wind speed exceeds 40 km/h, the construction work must cease. 	Contractor/ECO

	<ul style="list-style-type: none"> - Other atmospheric pollution may result from fumes and noxious gases released from vehicles and construction equipment i.e., hydrocarbon vapours, carbon monoxide, and sulfur oxides released. 		
<p>Waste generation</p>	<ul style="list-style-type: none"> - Construction activities will generate several types of solid wastes such as waste rocks, food refuse, trash, scrap materials, oily rags, and empty products containers. - Additionally, liquid waste from construction camps will be generated. - All these types of waste will have a negative impact on surrounding areas if not disposed of properly and regularly. - In addition, the process of transporting all construction debris may also disturb neighbouring areas and constitute a nuisance to residents around the site and may not be aesthetically acceptable. 	<ul style="list-style-type: none"> - All general waste generated at the site must be gathered and disposed to the nearest waste disposal site. - Recyclable waste i.e., Empty product containers, paper, plastic, etc., should be collected, sorted, and supplied to the local recycling companies. - Vehicles transporting waste should be sealed with a tarpaulin to avoid waste from being blown by wind and prevent dust emissions. - Provision must be made for sufficient portable ablution facilities during the construction period. - The recommended ratio is 2 toilets for every 25 people and separate water-closet for male and female as per the general health Regulations (GN 121. 1969). - The ablution facilities should be cleaned regularly with detergents and disinfectant soap. - The septic tanks should be Emptied at the nearest oxidation ponds once full or at least once a week. 	<p>Contractor/ECO</p>

<p>Disturbance to the hydrology of the area</p>	<ul style="list-style-type: none"> - The proposed construction activities may disrupt surface drainage and runoffs. 	<ul style="list-style-type: none"> - The excavation works should be done in such a way as to avoid blockage of surface flows and associated bedload. - Drip trays should be provided for vehicles and machines with leakages, and such vehicles should not be parked for long periods within the waterways. - All leaks and spills of oil and grease should be contained, cleaned up, and disposed of at the nearest dumpsite 	<p>Contractor/ECO</p>
<p>Groundwater contamination</p>	<ul style="list-style-type: none"> - The main impacts on groundwater associated with the construction activities could result from poor handling of liquid waste and chemicals, fuel spills, or leaks. 	<ul style="list-style-type: none"> - The Contractors should implement control measures on waste management and spill/leaks as outlined above. - Drip trays should be provided for vehicles and machines with leakages. - All construction vehicles must be serviced at the maintenance workshop, and no offsite maintenance should be allowed. - Refuelling of vehicles and machinery should be done at a designed transfer site supported with a bunding wall, big enough to contain 120% of the volume of the fuel tank. - A spill kit must be available at the construction site and there must be at least one person with appropriate authority who is trained in hazmat response. 	<p>Contractor/ECO</p>

		<ul style="list-style-type: none"> - Refuelling vehicles should be equipped with specific vehicle spill kits 	
Land-use effects	<ul style="list-style-type: none"> - Land use competitions could occur due to vehicle movement and other construction-related activities. - Other noticeable impacts could be noise, dust, and vibration generated from the construction site which could be a nuisance to the landowner, avifauna as well as wildlife and domestic animals. - The process of transporting all construction materials can also constitute a nuisance to residents in the access route. 	<ul style="list-style-type: none"> - Construction works should be limited to daylight, and no work should be allowed during odd hours. - Construction materials must be kept at the construction camps and only delivered when needed, rather than stacked onsite. - Only use designated access roads. - Control dust emission by sprinkling soil with water - The contractor must erect construction signage at the construction site. - Construction vehicles must be driven by authorized drivers only. 	Contractor/ECO
Disturbances from traffic movement	<ul style="list-style-type: none"> - Based on the experience of other similar projects, there will be a frequent movement of vehicles during the construction period. - Therefore, normal traffic movement, especially in the vicinity of the construction site and on the D3545 road will be disrupted during the construction period. 	<ul style="list-style-type: none"> - The contractor must erect construction signage at the construction site. - Construction vehicles must be driven by authorized drivers only and adhere to the authorized speed limits in town. - Heavy-duty vehicles and machinery must be tagged with reflective signs or tapes to maximize visibility and avoid accidents. - Revolving lights should be switched on when driving. 	Contractor/ECO

<p>Migrant construction workers and danger of HIV/AIDS and COVID-19</p>	<ul style="list-style-type: none"> - Migrant construction workers are likely to engage in casual relationships with locals. This may result in unplanned pregnancies, especially among school children, and may contribute to the spread of HIV/AIDS. - Moreover, the movement of people from other parts of the country will contribute to the spread of the COVID-19 pandemic. 	<ul style="list-style-type: none"> - Provide health education and awareness. - Qualified locals should be given priority. - Enforce Public Health COVID-19 General Regulations: Public and Environmental Health Act 2015 as amended. - Regular health check-ups. - Non-local Employees should be encouraged to return to their original residential areas after completion of the contract. 	<p>Contractor/PM</p>
<p>Safety and health hazards</p>	<ul style="list-style-type: none"> - Occupational health hazards are expected particularly about the construction workers who will be present at the site. - Workers will be exposed to dust, vibrations, high noise levels, sun exposure (sunstroke), and dehydration during summer months. - The safety of the public may also be compromised by certain construction activities i.e., uncovered trenches, increase in traffic volume generation of dust, noise, and vibration. 	<ul style="list-style-type: none"> - Construction workers must be provided with appropriate Personal Protective Equipment (PPE). - Employees must also be trained on the nature of their job and made aware of potential hazards at their workplace. - Ensure there is always a safety representative equipped with a First Aid kit at the construction site. All staff should know who the Safety Representative is. - The construction site must be barricaded and out of bound for the public and visitors. - All health and safety standards specified in the Health and Safety Regulations of the National Labour Act 11 of 1992 should be complied with. - Construction vehicles should be marked with appropriate signage. - Additional ablution facilities, including showers and a water closet with running water maybe required during the 	<p>Contractor/ECO</p>

		<p>construction phase. The recommended ratio for toilets is 2 toilets for every 25 adults for separate for male and female as per the General Health Regulations (GN. 121 1969).</p> <ul style="list-style-type: none"> - The floor of the maintenance workshop should be covered with industrial mats to contain oil and grease from vehicles and equipment servicing. - All operations should be limited to daylight and music played should not be at the discomfort of the neighbours. 	
<p>Impacts of temporary construction camps and workshops</p>	<ul style="list-style-type: none"> - The establishment of temporary construction camps will result in the generation of various types of waste. - Placing construction camps and workshops next to residential areas could result in a nuisance to the residents. 	<ul style="list-style-type: none"> - Construction camps must be established on a site with impervious surfaces in line with Section 183 of the General Health Regulations (GN. 121 1969) and must be approved by the Masida village headman or MTA. - Construction camps must be equipped with ablution facilities, including showers and a water closet with running water. The recommended ratio for toilets is 2 toilets for every 25 adults for separate for male and female as per the General Health Regulations (GN. 121 1969). - The floor of the maintenance workshop should be covered with industrial mats to contain oil and grease from vehicles and equipment servicing. - All operations should be limited to daylight and music played should not be at the discomfort of the neighbors. - No alcohol may be permitted in the construction camps and workshops. - Fireplaces should be properly secured and controlled. 	<p>Contractor/PM</p>

<p>Landscape and visual/aesthetic impacts</p>	<ul style="list-style-type: none"> - Visual impacts associated with the construction activities will occur because of the uncollected waste stockpile, unpacked construction materials, open trenches, and other facilities which makes the view of the site unappealing. 	<ul style="list-style-type: none"> - The stripped topsoil must be backfilled carefully after the completion of the pipe laying. - Waste generated should be collected and disposed of weekly. Excess sand from trenches should be regarded as waste. - Construction materials should be properly stacked in one place. - The construction area and construction camps and workshops should be kept neat as far as possible. - Uncovered trenches should be barricaded with danger tapes to ensure public safety. 	<p>Contractor/ECO</p>
<p>Water requirements and consumption</p>	<ul style="list-style-type: none"> - Construction activities will require water for civil works and domestic usage. 	<ul style="list-style-type: none"> - Employ water-saving measures such as: <ul style="list-style-type: none"> • The re-use of water for least important activities • The use water sparingly. • Avoid wastage, spillage, contamination, etc. 	<p>Contractor/ECO</p>
<p>Mixing of cement</p>	<ul style="list-style-type: none"> - Pollution and contamination of the environment may occur as a result of improper handling of cement. 	<ul style="list-style-type: none"> - Concrete shall not be mixed directly on the ground. Impermeable protective materials such as boards, plastic sheeting, mixing trays, etc., shall be used for this purpose. - The concrete batching works shall be always kept neat and clean. No batching activities shall occur on an unprotected substratum of any kind. - Contaminated water from batching areas shall not overflow but must be collected, stored, and disposed of at a site approved by the PM and ECO. 	<p>Contractor/s/ECO</p>

		<ul style="list-style-type: none"> - Unused cement bags shall be stored in weatherproof containers to prevent windblown cement dust and the contamination of water contamination rainfall or runoff events. - Used cement bags shall be disposed of regularly via the solid waste management system and shall not be used for any other purpose. - Care shall be taken to collect contaminated wash water from cleaning activities and dispose of it in a manner approved by the PM and ECO. - In the case of bulk cement, suitable screening and containment shall be in place during storage, loading, and batching to prevent wind-blown contamination. - The contractor shall collect all contaminated water and fine material from exposed aggregate finishes and store it in sumps for disposal at an approved waste disposal site. - All visible remains of excess concrete and aggregate shall be removed on completion of the plaster or concrete pour work and disposed of. 	
Fire outbreaks	<ul style="list-style-type: none"> - Construction activities such as welding, cooking, burning, etc., have the potential to cause fire outbreaks. This can be aggravated by the presence of flammable and combustible items i.e., fuel, vegetation, etc. 	<ul style="list-style-type: none"> - In terms of the Atmospheric Pollution Prevention Act (No. 45 of 1965), burning is not permitted as a waste disposal method. - Any fires that occur shall immediately be reported to the PM. - Ensure a designated smoking area far from fire hazard areas such as the workshop and fuel storage areas and 	Contractor/ECO

		<p>any areas where vegetation or other material could spread fire.</p> <ul style="list-style-type: none"> - Cigarette butts must be disposed of in a designated container. - There must be a competent fire safety officer who shall be responsible for ensuring immediate and appropriate actions in the event of a fire and shall ensure that employees are aware of the procedures to be followed. - Contractor shall be equipped with appropriate basic fire-fighting equipment (e.g., fire buckets, extinguishers, fire beaters, etc.) always. - Open fires for cooking purposes are not allowed, except within the accommodation camp under controlled conditions. Alternative green energy sources should be provided. 	
Criminal activities i.e., theft	<ul style="list-style-type: none"> - Construction materials and untended equipment kept onsite may attract criminals. 	<ul style="list-style-type: none"> - Materials and equipment must be stored in locked rooms or placed in a way that does not attract criminals. 	Contractor/ECO
Handling of complaints and grievances	<ul style="list-style-type: none"> - Grievance may be received from residents regarding construction activities. 	<ul style="list-style-type: none"> - All complaints and grievances shall be reported in the Form (see Annexure 3) and submitted to the PM 	PM
Worker's Accommodation	<p>Accommodation of workers on site could lead to:</p> <ul style="list-style-type: none"> - Creation of new access roads, especially if workers are returning 	<ul style="list-style-type: none"> - Labour force should be sourced locally where possible. The local labour force already resides in the area and would not need to be accommodated on site. 	Contractor/ECO

	<p>home late at night with poor visibility.</p> <ul style="list-style-type: none"> - Unsanitary environment with production of domestic grey wastewater. - Fire breakouts. - Illegal hunting of wildlife at night. 	<ul style="list-style-type: none"> - The labour force sourced outside of Masida village should not be accommodated on site but should rather rent accommodation establishments already existing in town. - Open fires are prohibited at the construction site. 	
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5.3 Proposed enhancement measures: Positive impacts

Table 4: Proposed enhancement measures for the envisaged positive impacts of the proposed telecommunication tower

Environmental Issue/Impacts	Source of Impact	Enhancement measures	Responsibility
Job opportunities for locals	<ul style="list-style-type: none"> - The proposed project will create job opportunities both direct and indirect for locals in technical and non-technical fields such as civil, electrical, mechanical, security, etc. 	<ul style="list-style-type: none"> - The priority must be given to locally qualified and unqualified people given the local unemployment rate and job scarcity. Women must be given the same opportunities as men. 	Contractor/PM
Business opportunities	<ul style="list-style-type: none"> - The construction works will create business opportunities for consultants, building contractors, and local suppliers of building materials. - Other local businesses such as guesthouses and street vendors will also benefit indirectly from the construction works. 	<ul style="list-style-type: none"> - Qualified Namibian construction companies should be given a fair chance to compete in the bidding process, which will be done in accordance with the Public Procurement Act 15 of 2015. - Construction materials should be sourced locally as far as possible to enhance the local economy. 	Central Procurement Board of Namibia (CPB), PowerCom internal Procurement Committee.
Economic contribution	<ul style="list-style-type: none"> - The construction period is expected to generate temporary employment and business opportunities. 	<ul style="list-style-type: none"> - The priority must be given to locally qualified and unqualified people given the local unemployment rate and job scarcity. 	

6. DECOMMISSIONING AND REHABILITATION

6.1 Decommissioning of the proposed tower

The decommissioning of the proposed telecommunication tower and the associated infrastructure is not foreseen in the immediate future. However, should the decommissioning of the entire tower or its components become pertinent at any stage, an amendment on this CEMP should be prepared before the commencement of any decommissioning works. The CEMP should entail the following components:

- The nature of the envisaged decommissioning and rehabilitation process
- Types and nature of components to be decommissioned.
- Types and quantity of waste to be produced.
- Proposed waste management strategy.
- Responsibilities of each party to be involved in the decommissioning process.
- Envisaged environmental rehabilitation procedures.

6.2 Rehabilitation

Rehabilitation is defined as the process of taking all the necessary actions to repair the damaged environment in-order to make the land suitable for other uses or to simply beautify the affected area. In this case, the rehabilitation will entail clean-up, treatment, or restoration of contaminated areas (e.g., contaminated soils by oil or fuel spills, concrete spills, etc.) and refilling of excavated pits with the overburden. Upon completion of construction works, the ECO and PM shall conduct a site inspection and instruct the responsible contractor to carry out rehabilitation activities as outlined in the table below.

Table 5: Rehabilitation management actions

PARAMETER	REHABILITATION MANAGEMENT ACTION	RESPONSIBILITY
Overall	Progressive rehabilitation shall be undertaken to minimise the amount of disturbance time. The disturbed area will be re-profiled to original or stable contours, re-establishing surface drainage lines and other land features.	Construction Contractor
Infrastructure	All temporary infrastructure, signage and other installations other than those required for environmental, or safety reasons shall be removed once backfilling and tie-ins are completed.	Construction Contractor
Waste	All waste materials (e.g. bags, pegs, skids, pillows) shall be removed from the construction areas once backfilling and tie-ins are completed.	Construction Contractor
Soils	Compaction relief shall be undertaken by scarifying or ripping as required along the contours, followed by raking and levelling.	Construction Contractor
Erosion	The beds of watercourses to be restored to the original gradient and the bank to the natural contours post disturbance.	Construction Contractor
Erosion	Backfill crown to be graded and shaped as closely as practicable to pre-existing contours and flow patterns.	Construction Contractor
Erosion	Banks to be reinstated in a manner that minimises erosion potential and does not alter natural streamflow - this may include the installation of rock gabions, rip rap, cement/s and hessian bags.	Construction Contractor

7. ENVIRONMENTAL MONITORING

To ensure continual improvement in environmental performance and reduce adversity of potential negative impacts, it is advisable to keep monitoring the identified environmental receptors.

7.1 Monitoring during the construction phase

Monitoring of all activities during the construction period will be under the responsibility of the Contractor, whose environmental performance will be controlled by the PM and the ECO.

Table 6: Monitoring plan during construction

Element	Location	Type of monitoring	Frequency of monitoring	Purpose of monitoring
Dust	At the construction sites	Visual monitoring	During periodic site visits	To ensure adherence to environmental protection requirements
Wastewater flows generated at the construction sites	At the construction sites	Visual monitoring	During monthly site visits	To ensure adherence to environmental protection requirements
Collection of solid waste	At the construction sites	Visual monitoring	During periodic site visits	To ensure adherence to environmental protection requirements
Use of dangerous materials (paints with heavy metals, lead compositions, asbestos-cement slabs, pipes, inflammable, toxic substances, etc.)	At the construction sites with the right documentation	Visual monitoring and study of documentation	Monthly	To ensure adherence to environmental protection requirements
Protective measures at the construction site	At the construction sites with the right documentation	Visual monitoring	Monthly	To ensure adherence to environmental protection and safety requirements
Earth restoration after excavation works	At the construction sites	Visual monitoring	After construction works	To ensure adherence to environmental protection requirements
Noise & vibrations resulting from equipment work	Project area/close to settlements	Portative noise metering device	During periodic site visits, daily	To ensure adherence to environmental protection requirements
Traffic operation /movement	At the construction sites	Visual monitoring of machinery and trucks carrying construction materials	During periodic site visits	To ensure adherence to environmental protection requirements
Vehicle and pedestrian safety when there are no construction activities	At the construction sites	Visual monitoring by supervisor	On daily basis during the construction phase	To ensure adherence to requirements

8. CONCLUSION

The preparation of this CEMP is based on the current information provided, any changes to the development site or infrastructure integrity shall trigger changes to this CEMP. This CEMP should be updated to include the operational and decommissioning aspects once approval is given by the relevant authority. If all mitigation measures are implemented as outlined in the CEMP, it is anticipated that the consequences and/or probability of the predicted negative impacts will be managed/reduced.

Although the implementation of this CEMP requires a multitude of administration, PowerCom should play a pivotal role in the implementation as outlined in this report. The proponent should also ensure proper coordination with all parties involved in the project construction of the proposed tower. The proponent shall also ensure to avail necessary resources (i.e., human, financial, etc.) and training to enable the full implementation of this CEMP. Monitoring of certain environmental parameters must be conducted regularly as outlined in this CEMP. Environmental biannual reports must be kept available for possible submissions to the MEFT and ensure the renewal of the project's ECC.

Upon approval by the MEFT, this CEMP should be used as an on-site reference document for the proposed telecommunication tower, thus a copy of this CEMP shall be kept onsite always. It is a legally binding document, thus, any deviation or transgression from this CEMP is punishable by law as per the Environmental Management Act 07 of 2007. Parties responsible for transgressing may be held responsible for any rehabilitation that may need to be undertaken.

9. ANNEXURE

9.1 Annexure 1: Environmental compliance monitoring checklist

9.2 Annexure 2: Incident / Accident report form

9.3 Annexure 3: Grievances register form

Annexure 1: Environmental Compliance Monitoring Checklist

The following checklist should be used during the compliance monitoring.

PART 1: ADMINISTRATIVE INFORMATION

Project Title:		Date:
Project location:	Reporting period	Individual Preparing Checklist:
Region:		Department:
Line Manager:		Phone No.:

PART 2: ENVIRONMENTAL ASPECTS

ENVIRONMENTAL ASPECT/IMPACT	ENVIRONMENTAL COMPLIANCE (AS PER CEMP REQUIREMENT?)		Remarks (specify the location, a good practice observed, causes of non-conformity, and proposed action)
	YES	NO	
Waste management			

PART 3: RECOMMENDATION

FOR EACH ITEM CHECKED IN PART 2, DESCRIBE THE CORRESPONDING CONTROLS TO BE IMPLEMENTED TO REDUCE POTENTIAL ENVIRONMENTAL IMPACTS (e.g., spill prevention, erosion controls, air emission controls including dust suppression, selection of materials, etc.). Provide details of the activities and impacts for each box and the proposed mitigations. Include attachments where appropriate. Use the same number system for your input.

ECO: Signature: _____ Date: _____

Line Manager: Signature: _____ Date: _____

Annexure 2: Incident / Accident Report Form

This form is to be completed in case of an environmental incident and shall be forwarded to the PM during the construction phase.

Note: This form is not intended to replace other PowerCom reporting procedures.

Section 1. GENERAL DETAILS	
Date: Time: am / pm	Reported By: Name: Position: Company: Phone:

Section 2. RESPONSIBLE PARTIES	
Name:	Phone:
Company Name:	Email:
Witness Details (if applicable)	
Name:	Phone:
Witness Statement Taken? <input type="checkbox"/> Yes <input type="checkbox"/> No	

Section 3. INCIDENT DETAILS	
Type of Incident:	<input type="checkbox"/> Spill <input type="checkbox"/> Waste/rubbish <input type="checkbox"/> Wildlife disturbance <input type="checkbox"/> Vegetation disturbance/damage <input type="checkbox"/> Acid Sulphate Soils disturbance <input type="checkbox"/> Cultural Heritage disturbance/damage <input type="checkbox"/> Chemicals/herbicide Use <input type="checkbox"/> Water pollution/contamination <input type="checkbox"/> Nuisance (noise, air quality) <input type="checkbox"/> Other:
Incident Description	
Immediate Response Actions Taken:	

Section 4. CONTRIBUTING FACTORS AND PREVENTATIVE ACTIONS

(to be completed by Manager/Supervisor)

Cause, Circumstances, and Contributing Factors:			
Measures that were in place to prevent this type of incident:			
Measures to be implemented to prevent/minimize this type of incident from occurring again			
Comments:			
Name:	Position:		
Company:	Signature:	Date:	

Section 5. ECO or PM OFFICE ONLY

Assessed Level of Potential or Actual Harm:			
Is an Investigation Required? <input type="checkbox"/> Yes <input type="checkbox"/> No	Investigation Team:		
FOLLOW UP ACTION:			
COMMENTS			
Name:	Position:		
Signature:	Date:		

Annexure 3: Grievances Register Form.

Grievance Registration	
Case No:	Date:
Name of the complainant:	Cell no:
	Email address:
Details of grievance: (Date, location, persons involved, frequency of occurrence, effects of the ensuing situation, etc.)	
Name of person recording grievance:	Cell number:
Proposed date of response:	
Signature of recording person:	Signature of the complainant:
Date of redress:	
Decision and action:	