

**ECC RENEWAL APPLICATION NR - 003880**

**OPERATIONS OF ACHILL ISLAND INVESTMENTS  
AGRICULTURAL PROJECT IN AUSSENKEHR, //KARAS  
REGION NAMIBIA**

**UPDATED ENVIRONMENTAL MANAGEMENT PLAN**



**Compiled by:**



**Compiled for:**

**Achill Island Investments (Pty) Ltd**

April 2024



<b>Project:</b>	<b>OPERATIONS OF ACHILL ISLAND INVESTMENTS AGRICULTURAL PROJECT IN AUSSENKEHR, //KARAS REGION NAMIBIA: UPDATED ENVIRONMENTAL MANAGEMENT PLAN</b>	
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<b>Report Approval</b>	 <b>André Faul</b> <b>Conservation Ecologist</b>	

I Kevin Liddle, acting as a representative of Achill Island Investments (Pty) Ltd confirm that the project details contained in this report is a true reflection of the information which the Proponent has provided to Geo Pollution Technologies. All material information in the possession of the Proponent that reasonably has or may have the potential of influencing any decision or the objectivity of this management plan is fairly represented in this report.

Signed at Cape Town on the 6 day of May 2024.

  
Achill Island Investments (Pty) Ltd

2015/0898  
Company Registration Number



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# 1 INTRODUCTION

Achill Island Investments (Pty) Ltd (the Proponent) requested Geo Pollution Technologies (Pty) Ltd to update their existing environmental management plan (EMP) in order to renew their existing environmental clearance certificate (ECC 01274) for their agricultural project focusing on table grapes (mainly) and dates located in Aussenkehr within the //Karas Region. (Figure 1-1). It includes all activities required in terms of vineyard and plantation management, maintenance of support infrastructure, operational equipment and labour management. An environmental impact assessment (EIA) was conducted for their operations in 2017 (Bosman et al. 2017). The EIA, together with an environmental management plan (EMP) were submitted to the Ministry of Environment, Forestry and Tourism (MEFT) as part of an application for an environmental clearance certificate (ECC). An ECC was subsequently granted to the Proponent in 2018. This ECC was updated in 2021.

The updated EMP provides management options to ensure impacts of the agricultural project are minimised. An EMP is a tool used to take pro-active action by addressing potential problems before they occur. This should limit the corrective measures needed, although additional mitigation measures might be included if necessary. The EMP acts as a stand-alone document, which can be used during the various phases (development, operational and decommissioning) of the mixed agricultural farm. All employees, contractors and sub-contractors taking part in all phases should be made aware of the contents of the EMP, to plan the relevant activities in an environmentally sound manner.

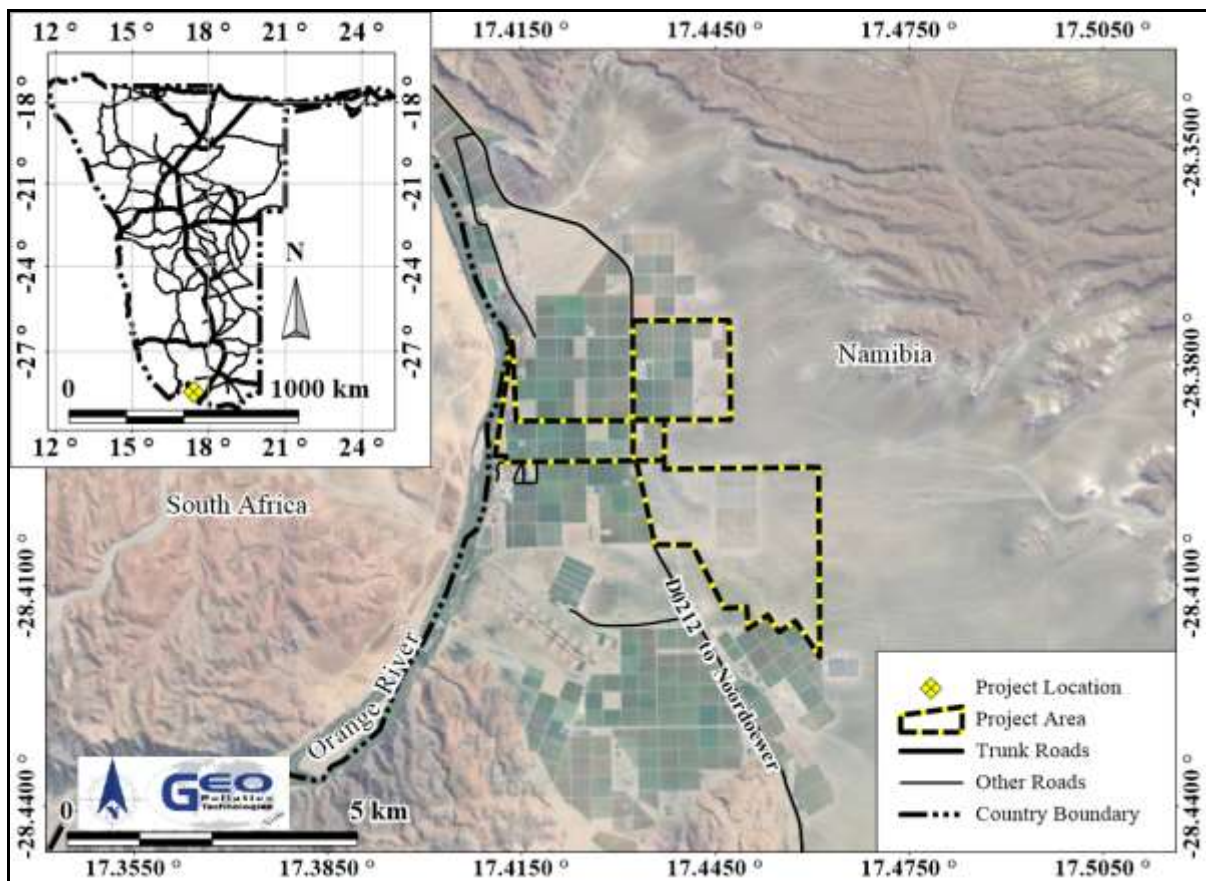


Figure 1-1 Project location

## 2 ADMINISTRATIVE, LEGAL AND POLICY REQUIREMENTS

To protect the environment and achieve sustainable development, all projects, plans, programmes and policies deemed to have adverse impacts on the environment require an ECC, as per the Namibian legislation. The legislation and standards provided in Table 2-1 to Table 2-3 govern the environmental assessment process in Namibia and/or are relevant to the project.

**Table 2-1 Namibian law applicable to the development**

<b>Law</b>	<b>Key Aspects</b>
<b>The Namibian Constitution</b>	<ul style="list-style-type: none"> <li>◆ Promote the welfare of people</li> <li>◆ Incorporates a high level of environmental protection</li> <li>◆ Incorporates international agreements as part of Namibian law</li> </ul>
<b>Environmental Management Act</b> Act No. 7 of 2007, Government Notice No. 232 of 2007	<ul style="list-style-type: none"> <li>◆ Defines the environment</li> <li>◆ Promotes sustainable management of the environment and the use of natural resources</li> <li>◆ Provides a process of assessment and control of activities with possible significant effects on the environment</li> </ul>
<b>Environmental Management Act Regulations</b> Government Notice No. 28-30 of 2012	<ul style="list-style-type: none"> <li>◆ Commencement of the Environmental Management Act</li> <li>◆ List activities that requires an environmental clearance certificate</li> <li>◆ Provide Environmental Impact Assessment Regulations</li> </ul>
<b>Fertilizers, Farm Feeds, Agricultural Remedies and Stock Remedies Act</b> Act No. 36 of 1947; Government Notice No. 1239 of 1947	<ul style="list-style-type: none"> <li>◆ Governs the registration, importation, sale and use of fertilizers, farm feeds, agricultural remedies and stock remedies</li> <li>◆ Various amendments and regulations</li> </ul>
<b>Water Resources Management Act</b> Act No. 11 of 2013	<ul style="list-style-type: none"> <li>◆ Provides for management, protection, development, use and conservation of water resources</li> <li>◆ Prevention of water pollution and assignment of liability</li> <li>◆ Requires licencing for water abstraction from an international river</li> </ul>
<b>Forest Act</b> (Act 12 of 2001, Government Notice No. 248 of 2001)	<ul style="list-style-type: none"> <li>◆ Makes provision for the protection of the environment and the control and management of forest fires</li> <li>◆ Provides for the licencing and permit conditions for the removal of woody and other vegetation as well as the disturbance and removal of soil from forested areas</li> </ul>
<b>Forest Regulations: Forest Act, 2001</b> Government Notice No. 170 of 2015	<ul style="list-style-type: none"> <li>◆ Declares protected trees or plants</li> <li>◆ Issuing of permits to remove protected tree and plant species</li> </ul>
<b>Soil Conservation Act</b> Act No. 76 of 1969	<ul style="list-style-type: none"> <li>◆ Law relating to the combating and prevention of soil erosion, the conservation, improvement and manner of use of the soil and vegetation and the protection of the water sources in Namibia</li> </ul>
<b>Petroleum Products and Energy Act</b> Act No. 13 of 1990, Government Notice No. 45 of 1990	<ul style="list-style-type: none"> <li>◆ Regulates petroleum industry</li> <li>◆ Makes provision for impact assessment</li> <li>◆ Petroleum Products Regulations (Government Notice No. 155 of 2000)</li> <li>◆ Prescribes South African National Standards (SANS) or equivalents for construction, operation and decommissioning of petroleum facilities (refer to Government Notice No. 21 of 2002)</li> </ul>
<b>Local Authorities Act</b> Act No. 23 of 1992, Government Notice No. 116 of 1992	<ul style="list-style-type: none"> <li>◆ Defines the powers, duties and functions of local authority councils</li> </ul>
<b>Public and Environmental Health Act</b> Act No. 1 of 2015, Government Notice No. 86 of 2015	<ul style="list-style-type: none"> <li>◆ Provides a framework for a structured more uniform public and environmental health system, and for incidental matters</li> <li>◆ Deals with Integrated Waste Management including waste collection disposal and recycling, waste generation and storage, and sanitation</li> </ul>



<b>Law</b>	<b>Key Aspects</b>
<b>Labour Act</b> Act No 11 of 2007, Government Notice No. 236 of 2007	<ul style="list-style-type: none"> <li>◆ Provides for Labour Law and the protection and safety of employees</li> <li>◆ Labour Act, 1992: Regulations relating to the health and safety of employees at work (Government Notice No. 156 of 1997)</li> </ul>
<b>Atmospheric Pollution Prevention Ordinance</b> Ordinance No. 11 of 1976	<ul style="list-style-type: none"> <li>◆ Governs the control of noxious or offensive gases</li> <li>◆ Prohibits scheduled process without a registration certificate in a controlled area</li> <li>◆ Requires best practical means for preventing or reducing the escape into the atmosphere of noxious or offensive gases produced by the scheduled process</li> </ul>
<b>Hazardous Substances Ordinance</b> Ordinance No. 14 of 1974	<ul style="list-style-type: none"> <li>◆ Applies to the manufacture, sale, use, disposal and dumping of hazardous substances as well as their import and export</li> <li>◆ Aims to prevent hazardous substances from causing injury, ill-health or the death of human beings</li> </ul>
<b>Road Traffic and Transport Act</b> Act No. 52 of 1999 Government Notice No 282 of 1999	<ul style="list-style-type: none"> <li>◆ Provides for the control of traffic on public roads</li> <li>◆ and the regulations pertaining to road transport</li> </ul>
<b>National Heritage Act</b> Act No. 27 of 2004, Government Notice No. 287 of 2004	<ul style="list-style-type: none"> <li>◆ Provides for protection and conservation of places and objects of heritage significance and the registration of such places and objects</li> </ul>
<b>Pollution Control and Waste Management Bill (draft document)</b>	<ul style="list-style-type: none"> <li>◆ Not in force yet</li> <li>◆ Provides for prevention and control of pollution and waste</li> <li>◆ Provides for procedures to be followed for licence applications</li> </ul>

**Table 2-2 Relevant multilateral environmental agreements**

<b>Agreement</b>	<b>Key Aspects</b>
<b>Stockholm Declaration on the Human Environment, Stockholm 1972</b>	<ul style="list-style-type: none"> <li>◆ Recognizes the need for a common outlook and common principles to inspire and guide the people of the world in the preservation and enhancement of the human environment</li> </ul>
<b>United Nations Framework Convention on Climate Change (UNFCCC)</b>	<ul style="list-style-type: none"> <li>◆ The Convention recognises that developing countries should be accorded appropriate assistance to enable them to fulfil the terms of the Convention</li> </ul>
<b>Convention on Biological Diversity, Rio de Janeiro, 1992</b>	<ul style="list-style-type: none"> <li>◆ Under article 14 of The Convention, EIAs must be conducted for projects that may negatively affect biological diversity</li> </ul>
<b>International Treaty on Plant Genetic Resources for Food and Agriculture, 2001</b>	<ul style="list-style-type: none"> <li>◆ Promote conservation, exploration, collection, characterization, evaluation and documentation of plant genetic resources for food and agriculture</li> <li>◆ Promote the sustainable use of plant genetic resources for food and agriculture</li> </ul>

**Table 2-3 Standards or codes of practise**

<b>Standard or Code</b>	<b>Key Aspects</b>
<b>South African National Standards (SANS)</b>	<ul style="list-style-type: none"> <li>◆ The Petroleum Products and Energy Act prescribes SANS standards for the construction, operations and demolition of petroleum facilities</li> <li>◆ SANS 10089-3:2010 is specifically aimed at storage and distribution of petroleum products at fuel retail facilities and consumer installations</li> <li>◆ SANS 10131 is specifically aimed at storage and distribution of petroleum products in aboveground storage tanks</li> <li>◆ Both SANS standards provide requirements for spill control infrastructure</li> </ul>

The agricultural and related activities listed as activities requiring an environmental clearance certificate are (Government Notice No. 29 of 2012):

***Section 1 of Government Notice No. 29 of 2012: Energy Generation, Transmission and Storage Activities***

1(a) The generation of electricity: The Proponent plans to established a 480 kVA photovoltaic plant per Nampower connection point for the generation of electricity.

***Section 2 of Government Notice No. 29 of 2012: waste Management, Treatment, Handling and Disposal Activities***

2.1 The construction of facilities for waste sites, treatment of waste and disposal of waste: Various sanitation systems are located among the vineyards for labourers. These are mainly septic tank-french drains

***Section 7 of Government Notice No. 29 of 2012: Agriculture and Aquaculture Activities***

7.5 Pest control: The Proponent uses Namibian approved and registered pesticides and herbicides as and when required, as part of vineyard and plantation management.

***Section 8 of Government Notice No. 29 of 2012: Water Resource Developments***

8.1 The abstraction of ground or surface water for industrial or commercial purposes: The Proponent abstracts water from the Orange River for irrigation purposes. The use is permitted as per the MAWLR requirements.

8.3 Any abstraction from a river that form an international boundary: The Proponent abstracts water from the Orange River for irrigation purposes The Orange River is an international river.

8.3 Irrigation schemes for agriculture excluding domestic irrigation: The Proponent does not manage a irrigation scheme per se, although irrigation systems are in place for all operations.

***Section 9 of Government Notice No. 29 of 2012: Hazardous Substance Treatment, Handling and Storage***

9.1 The manufacturing, storage, handling or processing of a hazardous substance defined in the Hazardous Substances Ordinance, 1974: The Proponent has a 46 m<sup>3</sup> aboveground fuel storage facility.

9.2 Any process or activity which requires a permit, licence or other form of authorisation, or the modification of or changes to existing facilities for any process or activity which requires an amendment of an existing permit, licence or authorisation or which requires a new permit, licence or authorisation in terms of a law governing the generation or release of emissions, pollution, effluent or waste: The Proponent has a 46 m<sup>3</sup> fuel aboveground storage facility. The facility is licenced as per the Ministry of Mines and Energy (MME) requirements.

9.3 Construction of filling stations or any other facility for the underground and aboveground storage of dangerous goods, including petrol, diesel, liquid petroleum gas or paraffin: The Proponent has a 46 m<sup>3</sup> fuel (diesel) aboveground storage facility.

### **3 ENVIRONMENTAL MANAGEMENT PLAN**

The EMP acts as a stand-alone document, which can be used during the various phases (development, operational and decommissioning) of the mixed agricultural farm. All employees, contractors and sub-contractors taking part in all phases should be made aware of the contents of the EMP, to plan the relevant activities in an environmentally sound manner.

The objectives of the EMP are:

- ◆ to include all components of the development;
- ◆ to prescribe the best practicable control methods to lessen the environmental impacts associated with the project;
- ◆ to monitor and audit the performance of personnel in applying such controls; and
- ◆ to ensure that appropriate environmental training is provided to all personnel.

### **3.1 IMPLEMENTATION OF THE EMP**

The tables below outline the management of the environmental elements that may be affected by the different activities. Impacts addressed and mitigation measures proposed are seen as minimum requirements which have to be elaborated on. Delegation of mitigation measures and reporting activities should be determined by the Proponent and included in the EMP. The EMP is a living document that must be prepared in detail, and regularly updated, by the Proponent as the project progress and evolve.

The EMP and ECC must be communicated to the managers and contractors. A copy of the ECC and EMP should be kept on site. All monitoring results must be reported on as indicated. Reporting is important for any future renewals of the ECC and must be submitted to the Ministry of Environment, Forestry and Tourism. Renewal of ECC will require six monthly reports based on the monitoring prescribed in this EMP.

Various potential and definite impacts will emanate from the operations and decommissioning phases. The majority of these impacts can be mitigated or prevented. The prevention and mitigation measures are listed below.

#### **3.1.1 Planning**

During the phases of planning for construction (upgrades, maintenance etc.) continued operations and possible future decommissioning of the agricultural project, it is the responsibility of Proponent to ensure they are, and remain, compliant with all legal requirements. The Proponent must also ensure that all required management measures are in place prior to, and during all phases, to ensure potential impacts and risks are minimised. The following actions are recommended for the planning phase and should continue during various other phases of the project:

Ensure that all necessary permits from the various ministries, local authorities and any other bodies that governs the operations of the agricultural project are in place and remains valid. This includes the water license.

Ensure all appointed contractors and employees enter into an agreement which includes the EMP. Ensure that the contents of the EMP are understood by the contractors, sub-contractors, employees and all personnel present or who will be present on site.

Make provisions to have a health, safety and environmental (HSE) coordinator to implement the EMP and oversee occupational health and safety as well as general environmental related compliance at the site.

Have the following emergency plans, equipment and personnel on site, where reasonable, to deal with all potential emergencies:

- ◆ EMP, risk management, mitigation, emergency response plan and HSE manuals;
- ◆ Adequate protection and indemnity insurance cover for incidents;
- ◆ Comply with the provisions of all relevant safety standards;
- ◆ Procedures, equipment and materials required for emergencies.

If one has not already been established, establish and maintain a fund for future restoration of the project site should project activities cease and the site is decommissioned and environmental restoration or pollution remediation is required.

Establish and/or maintain a bi-annual reporting system to report on aspects of operations, maintenance and decommissioning as outlined in the EMP. Submit bi-annual reports to the MEFT to allow for ECC renewal after three years. This is a requirement by MEFT. Appoint a specialist environmental consultant to update the EMP and apply for renewal of the ECC prior to expiry.

### **3.2 LAND USE, PLANNING, DEVELOPMENT AND OPERATIONAL – IDENTIFIED IMPACTS**

The following is the summary of the identified impacts:

- ◆ **Revenue generation (all phases)** - International capital spent in the professional sector of Namibia. Contribution to national, regional and local economies. Contribution to sustainable development and investors' confidence.
- ◆ **Contribution towards national and community development goals (development and operational phases)** - Expansion of the table grape and date sector in Aussenkehr and development of related and required infrastructure (such as a capital projects of electricity and water supply).
- ◆ **Loss of biodiversity and ecosystems integrity (development and operational phases)** - Change in biodiversity associated with the river due to introduction of toxins and nutrients.
- ◆ **Soil contamination and change in soil characteristics (development and operational phases)** - Change in chemical composition of soil as a result of irrigation;
- ◆ **Increased economic resilience of employees (all phases)** - Continued permanent employment (direct and indirect) and increased employment of villagers (during harvesting season).
- ◆ **Change (degradation) of Orange River water quality (operational phase)** - Possible contamination by chemical and hydrocarbon spills. Leachate of landfill and septic tank systems. Inflow of irrigated runoff and drainage water.
- ◆ **Poaching and illegal harvesting of plant material (development and operational phase)** - Poaching and illegal harvesting of vegetation.

### 3.3 LAND USE, DEVELOPMENT AND OPERATIONAL – MITIGATING MEASURES

The following is a summary of the proposed management plan, which will prepare and maintain the area for farming activities:

- ◆ Namibian companies contracted to conduct professional services.
- ◆ Liaison with regional and national governmental agencies through appropriate financial and social responsibility reporting.
- ◆ Infrastructure developments such as electricity generation, water and sanitation systems and node development to be maintained by implementing agencies. Where possible, public and private partnership projects should be considered.

**Table 4. Planning for Development, Operations and Future Decommissioning of the Project**

<b>Activity</b>	<b>Objective</b>	<b>Action</b>	<b>Timing</b>	<b>Proof of Compliance</b>	<b>Responsible Body</b>
<b>Compliance</b>	To comply with all legal requirements for the development and operations of the agricultural farm in Namibia.  To align the agricultural project with NDP5 and the future planned NDP6.	Apply for the necessary permits from the various ministries, local authorities and any other bodies that govern the development and operations of the project (such as water permits and fuel installation certificates.	Ongoing during continued operations.	All contracts, permits, certificates and other legal documents on file.	Proponent
<b>Baseline</b>	Determine baseline pollution conditions.	Continue collecting soil and water samples where required and analyse for chemicals of concern.	Ongoing during continued operations.	Analysis results on file.	Independent Specialist Consultant
<b>Appointments</b>	To appoint reputable contractors and/or operational personnel and establish the EMP, a legal requirement that forms part of the contract with the contractor and/or employees.	Appoint contractors and/or employees and enter into agreements which includes the EMP. Namibian companies to be contracted for services, deviations to be justified.  Ensure that the contents of the EMP are understood by the contractor, sub-contractors, employees and all personnel who will be present on site.	Ongoing during continued operations and possible minor construction events.	Contracts on file.	Proponent; Contractor
<b>Management</b>	Maintain a management system to implement and monitor health, safety and environmental matters.	A health, safety and environmental coordinator to implement the EMP and oversee occupational health and safety as well as general environmental related compliance at the site.  Have the following emergency plans, equipment and personnel in place to deal with all emergencies:  EMP/ Emergency Response Plan and HSE Manuals;  Adequate protection and indemnity insurance cover for incidents;	Ongoing during continued operations and possible minor construction events.	Documentation on file.	Proponent; Contractor

<b>Activity</b>	<b>Objective</b>	<b>Action</b>	<b>Timing</b>	<b>Proof of Compliance</b>	<b>Responsible Body</b>
		Comply with the provisions of all relevant safety standards.  Procedures, equipment and materials required for emergency plans to be set up.			
<b>Restoration</b>	To ensure that, should the project close a reasonable environmental restoration and pollution remediation plan can be implemented.	To ensure that any project activities and developments can be reasonably decommissioned and environmental restoration is possible.	Ongoing during continued operations.	Annual assessment of pollution risk.	Proponent
<b>Economy</b>	Maintain a positive input into the local and regional economy and agricultural sector.	Implement project as planned with associated positive inputs into the economy and sector.	Ongoing during continued operations.	Finances paid into the local and regional economies; number of employees.	Proponent
<b>Reporting</b>	Maintain a system to report on monitoring of the project as outlined in the EMP.	Maintain a system of monitoring and reporting on aspects of the EMP, which will be required for submission to allow for future ECC renewal applications.	During operations as well as possible future decommissioning of the development.	Monitoring Reports	Proponent; Contractor
<b>Public Communication / Communication strategy</b>	Management of communication to interested and affected parties regarding future developments.	Open communication regarding future development and employment opportunities to employees through employees' management structures.  Liaison with regional and national governmental agencies through appropriate financial and social responsibility reporting.	Ongoing during continued operations.	Communication record to be kept on file.	Proponent
<b>Environmental Clearance Renewal</b>	Renew the ECC every three years.	Apply for renewal of the ECC.	Prior to expiry of ECC.	Renewed ECC.	Proponent; Independent Specialist Consultant

**Table 5. The Development Phase (Construction and Maintenance Activities)**

<b>Criteria</b>	<b>Nature</b>	<b>Mitigation</b>	<b>Monitoring</b>	<b>Responsible Body</b>
<b>Skills, Technology &amp; Development</b>	Enhanced skills and technology transfer to the region and subsequent promotion of economic development.	Training must be provided to Namibians to ultimately employ a predominantly Namibian workforce.  Trained personnel to be issued with training certificates or managerial reference letters. Skills development and improvement programs to be made available as identified during performance assessments.	Copies of training certification or managerial references on file.  <b>Bi-annual</b> training summary report.	Proponent; Contractor; Directors & Public Relations personnel.
<b>HIV/AIDS, In-migration, Informal Settlements and Communicable Disease</b>	Increased spread of HIV/AIDS and communicable disease; Increased influx to the region and Aussenkehr in particular. Increased informal settlement and associated social challenges.	Employment for local people (already established) should be maintained. Deviations from this practice should be justified.  Educational programs / material on HIV/AIDs and communicable diseases to be provided to employees.	<b>Bi-annual</b> summary report of HIV educational programmes and training.  <b>Bi-annual</b> report and review of employee demographics (age, gender, number of sick days).	Proponent; Directors & Public Relations Personnel.
<b>Employment</b>	The agricultural sector plays an important role in providing employment to locals.	If skills exist locally Namibians must be employed. Alternatively, training must be provided to Namibians to ultimately employ a predominantly Namibian workforce.	<b>Bi-annual</b> report of employee records.	Proponent; Directors & Public Relations Personnel.
<b>Health &amp; Safety</b>	Risks include work related injuries such as falling from heights, accidents involving vehicles, heavy construction machinery and/or chemicals.	Qualified operators to work with heavy machinery.  All Health and Safety standards specified in the Labour Act and other applicable legislation should be complied with.  All staff members must be briefed about potential health risks and injuries on site.  All staff involved in development activities or handling of chemicals must at all times wear personal protective equipment (PPE).  Safe working conditions must be provided when working at heights or in confined spaces.  Selected personnel should be trained in first aid.  The contact details of all emergency services must be readily available.  Ensure that all personnel receive adequate instruction on	Any incidents must be recorded with action taken to prevent future occurrences. Incidents summary to be included in a <b>bi-annual</b> report.  The report should contain dates when training was conducted and when safety equipment and structures were inspected and maintained.	Contractor; Proponent

Criteria	Nature	Mitigation	Monitoring	Responsible Body
		<p>operating of equipment / handling of hazardous substances.</p> <p>Confirm operators have the training and / or skills required for the use of heavy machinery.</p>		
<b>Traffic Impacts</b>	Traffic incidents may occur during delivery of equipment and building materials, mostly at the turnoff to the project area.	<p>Regulation of traffic during deliveries for development activities especially for any special or abnormal loads which may be required.</p> <p>Erect warning signs where HVM may frequently operate. Erect adequate warning signs associated with any traffic risks. Cover all open loads (such as sand transportation). Transport labourers in buses as far as possible.</p> <p>Regular maintenance and servicing of all vehicles.</p> <p>All vehicles are to be roadworthy.</p> <p>All drivers are to adhere to all the Namibian requirements in terms of operating the vehicle driven.</p>	<p>Visual observation of impacts on traffic should be made.</p> <p>Any traffic complaints received must be taken up with the relevant authorities and discussed with the Proponent.</p> <p>Any incidents must be recorded with action taken to prevent future occurrences. Incidents summary to be included in a <b>bi-annual</b> report.</p>	Contractor, Proponent
<b>Noise</b>	Noise due to presence of heavy machinery on site.	<p>The site is situated in a rural area with no nearby villages.</p> <p>Follow Health and Safety Regulations of the Labour Act and the World Health Organization guideline on maximum noise levels (Guidelines for Community Noise, 1999) to prevent hearing impairment is followed. This limits noise levels to an average of 70 dB over a 24 hour period with maximum noise levels not exceeding 110 dB during the period.</p> <p>Hearing protectors must be issued as part of PPE if required / where applicable.</p>	<p>Any complaints received regarding excessive noise should be recorded with notes on action taken. Any negative effects caused from excessive vibrations should be recorded as well.</p> <p>Any incidents must be recorded with action taken to prevent future occurrences. Incidents summary to be included in a <b>bi-annual</b> report.</p>	Proponent
<b>Waste Production</b>	Any waste produced as a result of the development process, including waste water.	All waste produced must be collected and sent to the existing disposal facility. Disposal of hazardous waste to be at a hazardous waste disposal facility.	A register of hazardous waste disposal should be kept. This should include type of waste, volume as	Contractor



Criteria	Nature	Mitigation	Monitoring	Responsible Body
		<p>Water contaminated with hydrocarbons may not be disposed of on-site.</p>	<p>well as disposal method/facility.</p> <p>Any complaints received regarding waste should be recorded with notes on action taken. Incidents summary to be included in a <b>bi-annual</b> report.</p>	
<p><b>Groundwater, Surface Water and Soil Contamination</b></p>	<p>Hydrocarbon pollution from spills or leaks from vehicles, or chemicals (such as herbicides and pesticides) may cause water pollution in cases where the leaks and spills are not controlled and left to seep into the ground (drainage water and ultimately the Orange River).</p>	<p>Regular inspections and maintenance of all vehicles to ensure no leaks are present.</p> <p>Vehicles to be serviced and fuelled at appropriate facilities (such as workshop) on an impermeable surface with related pollution management structures.</p> <p>All waste must be removed from the project operational area and disposed of timeously.</p> <p>Any spills must be cleaned up immediately.</p> <p>Select alternative chemicals/materials that would not pose a threat to the groundwater, e.g. water based paints vs. solvent based paints.</p> <p>Hydrocarbon fuel spills to be remediated and significant spills to be logged on an incident register.</p> <p>Polluted soil and building rubble must be transported away from the site to an approved and appropriately classified waste disposal site.</p> <p>Polluted soil must be remediated where possible.</p> <p>Flow attenuation structures to be employed at drainage water discharge points where applicable.</p> <p>Implementation of incidents register.</p> <p>Implementation of maintenance register for all equipment and fuel / hazardous substance (such as chemicals) storage areas. All chemicals to be handled and stored according to</p>	<p>A register of all incidents must be maintained on a <b>daily</b> basis. This should include measures taken to ensure that such incidents do not repeat themselves.</p> <p>All spills or leaks must be reported on and cleaned up immediately.</p> <p>Any incidents must be recorded with action taken to prevent future occurrences. Incidents summary to be included in a <b>bi-annual</b> report.</p>	<p>Contractor</p>

Criteria	Nature	Mitigation	Monitoring	Responsible Body
		Material Safety Data Sheet (MSDS) labels.		
<b>Fire</b>	The possibility of a fire spreading to the surrounding agricultural units.	<p>Storage and handling of flammable products should be according to their MSDS instructions.</p> <p>A holistic fire protection and prevention plan is needed.</p> <p>All fire precautions and fire control at the agricultural project must be up to date.</p> <p>Firefighting measures as per the MSDS of products should be adhered to where relevant.</p> <p>No open fires should be allowed near vegetated areas.</p>	<p>A register of all incidents must be maintained on a <b>daily</b> basis. This should include measures taken to ensure that such incidents do not repeat themselves.</p> <p>Any incidents must be recorded with action taken to prevent future occurrences. Incidents summary to be included in a <b>bi-annual</b> report.</p>	Contractor, Proponent
<b>Ecosystem and Biodiversity Impact</b>	The impact on the ecological environment caused by development activities, including the clearing and excavation of the remaining open areas etc. which in turn can result in land degradation.	<p>All large indigenous trees on the riverbank to be protected.</p> <p>If human wildlife conflict exists the Ministry Environment, Forestry and Tourism (MEFT) must be consulted. Limit clearing of land to areas that will be irrigated. Plan roads to minimize impact beyond irrigable land.</p> <p>Prevent off-road driving or movement of earthmoving equipment outside of areas designated for clearing.</p> <p>No dumping of rocks and removed soil in environmentally sensitive areas. Where possible it can be used to fill erosion ditches, if any are present.</p> <p>Vehicle movement restricted to planned operational areas and no off-road driving to be allowed. Deviations to be motivated. It is recommended that dedicated roads be designed and maintained.</p>	<p>Regular inspection must be performed to monitor for any irregular activities outside the development footprint.</p> <p>Any incidents must be recorded with action taken to prevent future occurrences. Incidents summary to be included in a <b>bi-annual</b> report.</p>	Contractor, Proponent
<b>Illegal Hunting and Poaching of Wild Animals and Plant Material</b>	Illegal hunting and poaching of wild animals and plant material in conservation area and along the Orange River (including kudu and wild horses).	<p>All employees should be educated in induction about the value of biodiversity.</p> <p>Strict conditions prohibiting harvesting and poaching of fauna and flora should be part of employment contracts.</p>	A register of all incidents must be maintained This should include measures taken to ensure that such incidents do not repeat	Contractor, Proponent

Criteria	Nature	Mitigation	Monitoring	Responsible Body
		Disciplinary actions to be taken against employees failing to comply with contractual conditions.	themselves. Incidents summary to be included in a <b>bi-annual</b> report.	
<b>Dust</b>	Excessive dust generated from tillage and the movement of vehicles around the project area. This will be aggravated during periods of strong winds.	<p>Personnel issued with dust masks where required and regular dust suppression on frequently travelled roads.</p> <p>Dust mitigation measures which may be considered include (but are not limited to) the following:</p> <ul style="list-style-type: none"> <li>◆ Wetting of gravel roads (where appropriate).</li> <li>◆ Main tillage activities to be conducted in calm conditions.</li> <li>◆ Monitoring of dust accumulation on surrounding agricultural units.</li> </ul>	<p>Any complaints received regarding waste should be recorded with notes on action taken.</p> <p>Any incidents must be recorded with action taken to prevent future occurrences. Incidents summary to be included in a <b>bi-annual</b> report.</p>	Contractor, Proponent
<b>Impact on Utilities, Infrastructure and Services</b>	Any damage caused to existing infrastructure (such as roads) and water or electricity supply where such utilities are present. Additional pressure on essential and related governmental services.	<p>Appoint qualified and reputable contractors.</p> <p>Liaison with the local authorities and suppliers of services.</p> <p>Achill Island Investments to report any increases in demand for services to regional council.</p>	Report proposed increase in demand for services to local and regional authorities.	Contractor, Proponent
<b>Heritage and Archaeology</b>	The discovery of archaeologically or culturally important sites. The damage and or destruction of important archaeological finds.	<p>If any archaeologically important artefact is found, any work in that area must be halted and the relevant authorities must be informed. Firstly, the Namibian Police. Secondly, the National Monuments Council dealing with heritage.</p> <p>Implement chance-find procedures as stipulated in the Specialist Assessment Report for the project.</p> <p>Development phase activities may only continue at that location once permission has been granted.</p>	<p>Record any discoveries and proof of notifications to authorities on file.</p> <p>All information and reporting to be included in a report. Incidents summary to be included in a <b>bi-annual</b> report.</p>	Contractor
<b>Cumulative Impact</b>	These are impacts on the environment, which result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of who undertakes such other actions. Cumulative impacts can result from	<p>Addressing each individual impact recommended in the EMP would reduce the cumulative impact.</p> <p>Reviewing reports for any new or re-occurring impacts or problems would aid in identifying cumulative impacts and help in planning, if the existing mitigations are insufficient.</p> <p>Stormwater measures to be designed as not to have a</p>	<b>Bi-annual</b> summary report or close-out report based on bi-annual (one sample during peak usage and one sample during low usage) water monitoring results	Proponent

Criteria	Nature	Mitigation	Monitoring	Responsible Body
	<p>individually minor, but collectively significant actions taking place over a period of time. In relation to an activity, it means the impact of an activity that in itself may not be significant, may become significant when added to the existing and potential impacts resulting from similar or diverse activities or undertakings in the area.</p> <p>Possible cumulative impacts associated with the development phase include groundwater, surface water and soil pollution.</p>	<p>detrimental affect or concentrated flow onto adjacent farming operators.</p>	<p>and soil analyses.</p>	

**Table 6. The Operational Phase**

Criteria	Nature	Mitigation	Monitoring	Responsible Body
<p><b>Skills, Technology and Development</b></p>	<p>Enhanced skills to the \\Karas Region.</p>	<p>Achill Island Investments must employ local Namibian's where possible. Deviations from this practice should be justified.</p> <p>Maximise contribution to the Namibian economy by contribution to industry development and using Namibian suppliers.</p> <p>Achill Island Investments should consider making economic education available to employees who wish to receive it (outside of normal business hours).</p> <p>Ensure that any training (on the job and/or certified) is recorded and/or managerial reference provided to the employees.</p>	<p>Reporting of training and the enhancement of skills and transfer of technology. Incidents summary to be included in a <b>bi-annual</b> report.</p>	<p>The Proponent</p>

<b>HIV/AIDS, In-migration, Informal Settlements and Communicable Disease</b>	Increased spread of HIV/AIDS; Increased influx to the \\Karas Region; Increased informal settlement areas and associated social challenges.	Primarily employ local people (already residing in the area) as far as possible.  Educational programs and or material on HIV/AIDS and communicable disease should be employed.	Report of training conducted.  <b>Bi-annual</b> report and review of employee demographics (age, gender, number of sick days).	Proponent; Directors & Public Relations Personnel.
<b>Employment</b>	The project will sustain and increase employment in the \\Karas Region.	Local Namibian's must be employed. Deviations from this must be justified.  Adhere to all Namibian Labour Act requirements.	Maintain documentation of employment.	Proponent
<b>Pressure on Service Infrastructure</b>	Sustained employment and increased employment during harvesting season increases pressure on public infrastructure and services which include, but are not limited to, health, education, sanitation and security.	Achill Island Investments to continue reporting possible increased demand for services to regional council.  Where feasible, the company may consider assisting government projects.	Report proposed increase in demand for services to local and regional authorities.	Proponent
<b>Health, Safety &amp; Security</b>	The risk of accidents or injuries due to incorrect use of machinery, equipment and/or chemicals, or equipment failure.	The health and safety regulations of the Labour Act must be adhered to. An integrated health and safety management system should be implemented. Typical preventative or mitigating measures within the health and safety management systems include:  <ul style="list-style-type: none"> <li>◆ Qualified operators to work machinery and/or equipment,</li> <li>◆ Safe work standard operating procedures,</li> <li>◆ Health and safety training,</li> <li>◆ Permits, where required,</li> <li>◆ Emergency response plans,</li> <li>◆ First aid treatment and training,</li> <li>◆ Medical procedures and emergency services,</li> <li>◆ Regular safety checks and/or drills.</li> </ul> Procedures for dealing with health and safety issues must be in place and all contact details for emergency personnel and services available.  Ensure that all staff members are briefed about the potential risks on site (including flash floods).  Selected personnel should be trained in first aid.	Any incidents must be recorded with action taken to prevent future occurrences. Incidents summary to be included in a bi-annual report.  Reporting of training, and inspections of safety equipment and structures. Training summary to be included in a <b>bi-annual</b> report.	Proponent

Criteria	Nature	Mitigation	Monitoring	Responsible Body
		<p>Equipment must be locked away so that it does not encourage criminal activities (e.g. theft).</p> <p>Access to the locked away equipment should always be strictly controlled.</p> <p>No alcohol or recreational drugs are allowed in workplaces or agricultural units.</p> <p>No labourers under the influence of either alcohol or drugs should be allowed to conduct any work.</p>		
<b>Traffic</b>	General increase in traffic as a result of the project.	<p>Signs to be placed at junctions with main roads to warn oncoming traffic of operational farming vehicles.</p> <p>All vehicles to be fitted and maintained with adequate signalling devices to increase awareness over and above standard features.</p> <p>All operators / drivers to adhere to all the requirements of the Traffic Act.</p>	Any complaints received or incidents reported regarding traffic issues should be recorded. This should include mitigation measures to prevent future incidences. Incidents summary to be included in a <b>bi-annual</b> report.	Proponent
<b>Fire</b>	Outbreak of an uncontrolled fire in agricultural units, pack-houses or operational areas.	<p>Open fires should not be allowed outside of designated areas.</p> <p><b>Firefighting and Fire Prevention:</b></p> <p>Fire precautions and fire control must be present at the site.</p> <p>All flammable materials must be stored according to their material safety data sheet instructions.</p> <p>A holistic fire protection and prevention plan is needed. This plan must include an emergency response plan and firefighting plan.</p> <p>Experience has shown that the best chance to rapidly put out a major fire is in the first 5 minutes. It is important to recognise that a responsive fire prevention plan does not solely include the availability of firefighting equipment, but more importantly, it involves premeditated measures and activities to timeously prevent, curb and avoid conditions</p>	<p>Any incidents must be recorded with action taken to prevent future occurrences. Incidents summary to be included in a <b>bi-annual</b> report.</p> <p>The report should contain dates of fire drills and when fire equipment was tested.</p>	Proponent

Criteria	Nature	Mitigation	Monitoring	Responsible Body
		that may result in fires.		
<b>Noise</b>	Noise as a result of either machine and / or equipment operations.	Follow Health and Safety Regulations of the Labour Act and the World Health Organization guidelines on maximum noise levels (Guidelines for Community Noise, 1999) to prevent hearing impairment. This limits noise levels to an average of 70 dB over a 24 hour period with maximum noise levels not exceeding 110 dB during the period.  Personnel working in noisy environments must be issued with hearing protectors.	Any complaints received regarding excessive noise should be recorded with notes on action taken. Incidents summary to be included in a <b>bi-annual</b> report.	Proponent
<b>Dust</b>	Dust generated from the movement of vehicles around operational areas and the exposure of bare soil during agricultural activities. This will be aggravated during periods of strong winds.	Personnel must be issued with dust masks if required.  Dust abatement measures to be employed on the most frequently used roads.	Regular visual inspection.  A stakeholder complaints register must be maintained. Complaints must be investigated and, if appropriate, acted upon. Complaints summary to be included in a <b>bi-annual</b> report.	Proponent
<b>Waste Production</b>	Any waste which can include hazardous waste, such as hydrocarbons or domestic waste.	All legal requirements regarding effluent handling and disposal should be followed. In particular the necessary water abstraction permits and authorisations should be obtained from the Ministry of Agriculture Water and Land Reform (MAWLR).  All other organic/biological waste must be disposed of or treated without delay to prevent attracting pests.  All ablution facilities to be operated and maintained according to specification. Education regarding the use of such facilities to be provided, and the environmental degradation due to misuse.  Staff to receive training on waste handling and the principles of reduce, reuse and recycle.  Chemical and fuel handling and storage according to MSDS labels. Chemicals to be stored in a way that runoff water	Any complaints received regarding waste should be recorded with notes on action taken.  All data to be compiled in a <b>bi-annual</b> report.	Proponent

Criteria	Nature	Mitigation	Monitoring	Responsible Body
		<p>would not wash chemicals into the river. No chemical / fuel storage should be within the 1:100 year flood line of the Orange River.</p> <p>Follow the IFC procedures for storage and handling of chemicals to prevent toxins and nutrient from entering the Orange River and groundwater.</p>		
<p><b>Groundwater, Surface Water and Soil Contamination</b></p>	<p>Hydrocarbon pollution may result from machine and equipment spills and or leakages. Increase of nutrient levels or organic pollutants (from effluents and fertilizers) in the soil that can leach to shallow ground water.</p> <p>Spilled hazardous waste such as fuels and oil.</p>	<p>All vehicles must be serviced and maintained regularly.</p> <p>Spill control by making use of drip trays when needed. All hydrocarbon based fluids must be removed from site and disposed of at a recognised hazardous waste disposal facility.</p> <p>Any polluted soil or water to be treated as a hazardous waste.</p> <p>Maintain drainage pipes and channels.</p> <p>Employ best practice irrigation methods.</p> <p>Implementation of best salinity management practices.</p> <p>Soil flushing should be minimised to reduce pollution of the Orange River.</p> <p>Monitor soil quality.</p> <p>Bi-annual monitoring of intake water quality; drainage water quality and water upstream and downstream of the drainage points.</p> <p>Documentation of use of all chemicals, herbicide, pesticides and nutrients. Minimise application of herbicides, pesticides and nutrients as far as possible to minimise toxins and nutrients entering the groundwater.</p> <p>Incident records kept of all significant chemical and hydrocarbon spills and remediation measures taken.</p> <p>Re-use drainage water where possible (for example dust suppression).</p>	<p>Reporting of all spills or leakages. The report should contain the following information:</p> <p>Date and duration of spill,</p> <p>Product spilled,</p> <p>Volume of spill,</p> <p>Remedial action taken,</p> <p>Incidents summary to be included in a <b>bi-annual</b> report.</p>	<p>Proponent</p>



<b>Criteria</b>	<b>Nature</b>	<b>Mitigation</b>	<b>Monitoring</b>	<b>Responsible Body</b>
<b>Poaching, Hunting or Removal of Plant Material</b>	Personnel should be discouraged from partaking in poaching and made aware of the legal implications on conducting such offences.	All employees should be informed during induction of the value of biodiversity. Rules and regulations regarding the illegal harvesting of natural resources from the surroundings must be made clear and the disciplinary steps that will be followed against perpetrators must be issued in writing and form part of the employee's contracts.	A reporting of any incidents must be maintained in a <b>bi-annual</b> summary report.	Proponent
<b>Ecosystem and Biodiversity Impact</b>	Ecosystem and biodiversity impacts will mostly be as a result of the cumulative effect of other impacts such as groundwater, surface water and soil contamination, fire, poaching or illegal harvesting of plant material.	Trees listed as threatened by IUCN or in Appendix 2 of CITES and those protected by forestry legislation should not be removed unless permits from MEFT have been obtained. Such trees include large trees on the banks of the Orange River as identified per the original Ecology Study conducted.  Photographic documentation of vegetation on the riverbank and at points along the drainage lines to monitor potential changes over time.  Raise awareness of workers on the value of biodiversity and the need for its protection.	Any incidents must be recorded with action taken to prevent future occurrences. Incidents summary to be included in a <b>bi-annual</b> report.	Proponent
<b>Cumulative Impacts</b>	These are impacts on the environment, which result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of who undertakes such other actions. Cumulative impacts can result from individually minor, but collectively significant actions taking place over a period of time. In relation to an activity, it means the impact of an activity that in itself may not be significant, may become significant when added to the existing and potential impacts resulting from similar or diverse activities or undertakings in the area.  Possible cumulative impacts associated	Addressing each individual impact recommended in the EMP would reduce the cumulative impact.  Reviewing bi-annual and annual reports for any new or re-occurring impacts or problems would aid in identifying cumulative impacts and help in planning if the existing mitigations are insufficient.  Report poor water quality to ORASECOM.	<b>Bi-annual</b> summary report based on all incidents and water monitoring results and soil analyses.	Proponent

Criteria	Nature	Mitigation	Monitoring	Responsible Body
	with the development phase include groundwater, surface water and soil pollution. Additional impacts include social impacts which relate to service delivery and social challenges.			

**Table 7. Decommissioning Phase**

Criteria	Nature	Mitigation	Monitoring	Responsible Body
<b>Waste Production</b>	<p>Upon decommissioning, waste will be produced in the form of building rubble, and obsolete equipment, structures, and/or residual products that can be used elsewhere or sold as scrap.</p> <p>Soil polluted by hydrocarbons must be treated as hazardous waste.</p>	<p>To reduce the amount of waste all re-usable material must be removed to another site or sold.</p> <p>Those items that cannot be used again must be scrapped in the appropriate manner.</p> <p>Upon demolition of the buildings and concrete the rubble must be removed from the property and taken to an approved dumpsite.</p> <p>Rehabilitation if necessary is to be done using funds set aside for such purpose.</p>	<p>Regular visual inspections to be performed during decommissioning.</p> <p>A register of waste produced and disposal methods to be maintained during decommissioning.</p>	Proponent; Contractor
<b>Ecological Impact</b>	<p>Operations spanning many years may create new habitat for fauna and flora. Upon decommissioning these habitats will be destroyed.</p>	<p>Where new habitats were created, that are now occupied by sensitive or protected fauna or flora, the MEFT or other appropriate organizations must be contacted to establish the conservation status and handling thereof.</p>	<p>A report should be compiled of any sensitive or protected fauna and flora that established itself on the premises. The report should include all actions taken to relocate or deal with the situation.</p>	Proponent; Contractor
<b>Employment</b>	<p>Decommissioning of the agricultural project will lead to retrenchments or re-location of staff.</p>	<p>Plan in advance for meeting the Labour Act's requirements for retrenching staff if required.</p>	<p>In the year prior to decommissioning, draft plans for handling of employees. The report should include budgeting for retrenchments and possible alternative positions elsewhere.</p>	Proponent; Directors & Public Relations personnel or Human Resource Department.

<b>Criteria</b>	<b>Nature</b>	<b>Mitigation</b>	<b>Monitoring</b>	<b>Responsible Body</b>
<b>Dust</b>	Dust will be generated during the Decommissioning Phase and might be aggravated during periods of strong winds.	It is recommended that regular dust suppression be included in the decommissioning phase, when dust becomes an issue.  Personnel should be issued with dust masks for work in dusty environments.	Regular visual inspection.  A complaints register must be maintained, in which any complaints from the community must be logged. Complaints must be investigated and, if appropriate, acted upon.	Proponent; Contractor
<b>Noise</b>	Noise pollution will exist due to heavy vehicles accessing the site to collect rubble from demolished building materials.	Noise levels during this phase should follow the Health and Safety Regulations of the Labour Act and World Health Organization guideline on maximum noise levels (Guidelines for Community Noise, 1999) to prevent hearing impairment. This limits noise levels in industrial areas to an average of 70 dB over a 24 hour period with maximum noise levels not exceeding 110 dB during the period.  When the noise levels are too high then all personnel must be issued with hearing protectors and neighbours must be notified of the time and duration of decommissioning.	A complaints register must be maintained, in which any complaints from the community must be logged. Complaints must be investigated and, if appropriate, acted upon.	Proponent; Public Relations Personnel; Contractor.
<b>Groundwater, Surface Water and Soil Contamination</b>	Hazardous and ecologically detrimental substances (such as hydrocarbons and chemicals) which are spilled may contaminate soil and drainage water as well as water in the Orange River.	All precautions are to be taken to prevent contamination of the soil as this could enter the ecosystem. Leakages from vehicles might occur especially if they are serviced on site. Drainage water might spread pollutants to neighbouring receptors. Pollutants in the soil and building rubble must be transported away from the site to an approved, appropriately classified waste disposal site.	Reporting of all spills or leaks is to be completed by decommissioning Contractor.	Proponent; Contractor
<b>Health, Safety and Security</b>	Health and Safety risks, similar to previous phases will be present. All other risks associated with demolitions must be considered.	Adequate measures to ensure safety of staff on site, including: <ul style="list-style-type: none"> <li>● Proper training of operators;</li> <li>● First aid treatment;</li> <li>● Medical assistance;</li> <li>● Emergency treatment;</li> <li>● Protective clothing, footwear, gloves and belts; safety goggles and shields.</li> </ul>	During decommissioning, a register of all incidents must be maintained on a <b>weekly</b> basis. This should include measures taken to ensure that such incidents do not repeat itself.	Proponent; Contractor
<b>Fire</b>	Outbreak of an uncontrolled fire.	Open fires should not be allowed outside designated areas.	Any incidents must be	Proponent

Criteria	Nature	Mitigation	Monitoring	Responsible Body
		<p><b>Firefighting and Fire Prevention:</b></p> <p>Fire precautions and fire control must be present.</p> <p>All personnel to be sensitised about fire protection measures.</p> <p>A holistic fire protection and prevention plan must be drafted for the decommissioning phase and include an emergency response and firefighting plan.</p> <p>Experience has shown that the best chance to rapidly put out a major fire is in the first 5 minutes. It is important to recognise that a responsive fire prevention plan does not solely include the availability of firefighting equipment, but more importantly, involves premeditated measures and activities to timeously prevent, curb and avoid conditions that may result in fires.</p>	<p>recorded <b>monthly</b> with action taken to prevent future occurrences.</p> <p>The report should contain dates when fire drills were conducted and when fire equipment was tested.</p>	
<p><b>Poaching, Hunting or Removal of Plant Material</b></p>	<p>Personnel staying and working on site may use the opportunity to illegally hunt or trap animals.</p>	<p>Education is key to prevention. All employees must be informed of the value of biodiversity. Rules and regulations regarding the illegal harvesting of natural resources from the surroundings must be made clear and the disciplinary steps that will be followed against perpetrators must be issued in writing and form part of the employee's contracts.</p>	<p>Any incidents must be recorded <b>monthly</b> with action taken to prevent future occurrences.</p>	<p>Proponent</p>

## **4 CONCLUSIONS**

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The above EMP, if properly implemented will help minimise adverse impacts on the environment. Where impacts occur, immediate action must be taken to reduce the escalation of effects associated with these impacts. As a living document and to ensure the relevance this EMP must be reviewed (where applicable) continually by the Proponent.

The EMP should be used as an on-site reference document during all phases of the project, and auditing should take place in order to determine compliance with the EMP for the proposed area, and parties responsible for transgression of the EMP should be held responsible for any rehabilitation that may need to be undertaken.

Monitoring reports must be submitted to the MEFT every six months to allow for environmental clearance certificate renewal after three years. This is a requirement by MEFT.