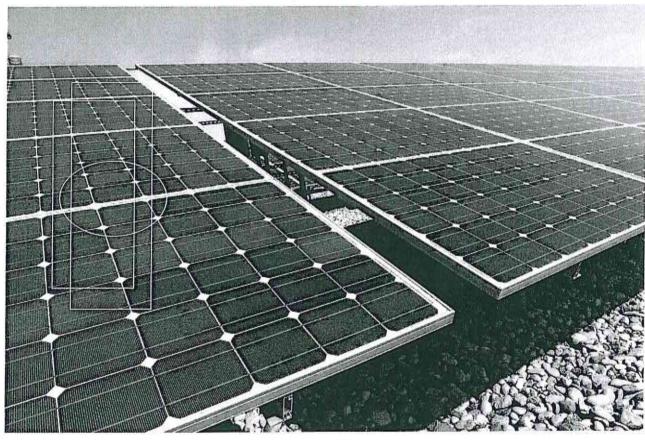
ENVIRONMENTAL IMPACT ASSESSMENT (EIA) AND ENVIRONMENTAL MANAGEMENT PLAN (EMP) FOR THE PROPOSED ESTABLISHMENT OF A RENEWABLE PHOTOVOLTAIC SOLAR POWER PLANT, GOBABIS, OMAHEKE REGION

DECEMBER 2014



Prepared for:

Oka Investment (Pty) Ltd and Benzel and Partners Investments (Pty) Ltd

Werner List Street Capital Centre Building, 2nd Floor, Windhoek, PO Box 678, Windhoek, Namibia. Prepared by:
Centre for
Research cc
P.O BOX 31423,
PIONEERSPARK PRACTICAL TO FAIR WINDHOEK.



CEGEOR

PROJECT DETAILS

TITLE: Environmental Impact Assessment and Environmental Management Plan for the proposed construction of a renewable photovoltaic solar power plant, Gobabis, Omaheke Region, Namibia.

AUTHORS:

- o Mr Siyambango Mulife (Centre for Geosciences Research cc)
- o Ms Uvangua Mbahepa (Centre for Geosciences Research cc)

o Ms Anna David (Centre for Geosciences Research cc)

CLIENT:

Werner List Street, Capital Centre Building, 2nd Floor,

Windhoek, Namibia.

PO Box 678, Windhoek,

Namibia.

CONSULTANCY:

Centre for Geosciences Research cc

PO Box 31423 Pioneerspark Windhoek, Namibia Tel: 061 307157

Fax: 061 307156

NAME	Mulife Siyambango	
RESPONSIBILITY	Director of Centre for Geosciences Research cc	
QUALIFICATIONS	B. Sc. in analytical, inorganic and physical chemistry, M. Sc. in Industrial Rocks and Minerals, MBA in Banking, Accounting and Strategic Management.	
PROFESSIONAL REGISTRATION	Pr.Sci.Nat	
EXPERIENCE	Mr Siyambango is the director and founder of Centre for Geosciences Research cc Mr Siyambango is a qualified geologist, and specialist in industrial minerals and rocks. Obtained an MSc in Industrial Rocks and Minerals with majors in Mineral Resource Assessment & Estimation; Mineral Extraction & Management Marketing of Industrial Rocks and Minerals, Geology and Technology of Industrial Rocks and Minerals. Mr Siyambango is a fully trained and qualified Chemist with a BSc in analytical, inorganic and physical chemistry. Extensively trained and experienced in analytical instruments that are essential for mineral	

Page 2

	exploration and mineral processing. Academically and experienced trained Manager, with an MBA in Banking, Accounting and Strategic Management. The qualification supplements the economic assessment of commerciality of mineral resources for assessment of the bankability.
NAME	Anna David
RESPONSIBILITY	Environmental Geologist at Centre for Geosciences Research cc
QUALIFICATIONS	BSc. in Geology (Honours)
EXPERIENCE	Ms Anna is a qualified geologist and is working for Centre for Geosciences Research cc as an Environmental Geologist. Ms Anna's responsibilities involve undertaking Environmental Impact Assessment studies, fieldwork, license renewals. Ms Anna has a determined character and is a vibrant lady ready to take up challenging projects to the best of her ability.
NAME	Uvangua Mbahepa
RESPONSIBILITY	Project Geologist at Centre for Geosciences Research
QUALIFICATIONS	BSc. in Geology (Honours)
EXPERIENCE	Ms Uvangua is a qualified geologist and is working for Centre for Geosciences Research cc as a Project Geologist. Ms Uvangua's responsibilities involve compiling geological reports, licence renewals and applications, fieldwork. Ms Uvangua has an ability to work well individually as well as in a strong team concept environment under pressure and complete projects to the highest standards.

Table of Contents

Executive	Summary	8
1. INTRO	DOUCTION	8
1.1. Pro	oject Background	9
	General Overview	
	cation of the Project	
1.3. Th	e objectives of the Environmental Assessment Process	.11
	rms of Reference	
1.5. Sc	ope of the Environmental Impact Assessment	12
2. BACK	GROUND TO PHOTOVOLTAIC SOLAR POWER SYSTEMS	13
2.1. W	nat is a photovoltaic solar power system?	13
	id connected PV solar power systems	
2.3. Adva	antages and disadvantages of PV solar power systems	14
3. PROJI	ECT DESCRIPTION	16
3.1. Ge	neral Overview	16
3.2. Ph	ysiography	
3.2.1.	Climate	17
3.2.2.	Geology of the site	18
	tionale for the proposed site	
3.4. Pro	posed project details	20
4. LEGAI	_ AND REGULATORY FRAMEWORK	21
4.1. Na	mibian Legislation, Guidelines and Policies	21
4.1.1.	The Namibian Constitution	21
4.2. Leg	gal instruments relevant to this project	22
4.2.1.	Electricity Act No. 4 of 2007	24
4.2.2.	Environmental Legislation	24
4.2.3.	Legislations on Biodiversity	25
4.2.4.	National Heritage Act No. 27 of 2004	26
4.2.5.	Legislations for health and safety	27
5. AFFEC	TED ENVIRONMENT	28
5.1. Soc	cio-Economic Environment	28
5.2. Bio	physical Environment	29
5.2.1.	Biodiversity (Fauna and Flora)	29

	5.2.2.	Groundwater and surface water hydrogeology	3
	5.3. Po	ential impacts identified	
	5.3.1.	Positive Impacts	
	5.3.2.	Negative Impacts	3
6	. PUBLI	C CONSULTATION PROCESS	
	6.1. Leg	gal and policy requirement	34
	6.1.1.	Environmental Management Act (2007) and it EIA regulations (2012)	
	6.2. Co	nsultation process followed during the EIA process	
		itation of the public consultation process	
		e interested and affected parties (I& APs)	
		come of the public consultation meeting	
		issues identified during the public participation process	
7		L IMPACT ASSESSMENT	
		sity of Visual Impact	
		icance of Visual Impact	
		odology	
		iption of the project	
		ion Phase	
		nal Phase	
		l Receptors	
		tion Measures	
8.	1,770	T ASSESSMENT	
		sed Development Environmental Impact Evaluation	
	POSTORIA P. AGRICUATION	ification of potential impacts	
		ts Associated with Construction Phase	
		ts Associated with Operational Phase	
		ets Associated with Decommissioning Phase	
a		FNCES	

LIST OF FIGURES

Figure 1: Location of the project area in Gobabis, Omaheke Region (Source: Maps of
Namibia, 2012)10
Figure 2: Environmental Assessment process in Namibia (Directorate of Environmental
Affairs (DEA, 2008)12
Figure 3: How the PV solar system works (Source: www.markgroup.co.uk)13
Figure 4: The installation site for the proposed renewable PV solar power plant in
Gobabis16
Figure 5: Climate conditions in Gobabis (Source: World Climate Guide)17
Figure 6: geology of the project area indicating rocks of the Damara Supergroup as well
Nama Group rocks18
Figure 7: Average monthly sunshine hours in Gobabis, Omaheke Region (Source:
www.weather-and-climate.com)19
Figure 8: The site where the proposed PV solar power plant is to be constructed (Source:
Google Map)19
Figure 9: Vegetation in the surrounding of proposed area29
Figure 10: Vegetation in the project area (Source: National Atlas of Namibia)30
Figure 11: Small stock animals such as sheep and wildlife such as hyenas in the
surroundings31
Figure 12: Hydrogeological Regions of Namibia (Christelis and Struchmier, 2001)32
Figure 13: Invitations to the public to attend the meeting were put up on notice boards at
strategic places in Gobabis
Figure 14: A) Community members in attendance at the public meeting held in Gobabis,
B) Centre for Geosciences Research cc environmental expert Ms Anna David giving the
presentation of the EIA process for the proposed project
IP 15.5. 그렇게 HT 20.5. 15. 15. 15. 15. 15. 15. 15. 15. 15.

LIST OF TABLES

Table 1: Legal instruments relevant to this project	22
Table 2: Public consultation process	
Table 3: Potential Sensitivity of Visual Receptors - Renewable photovoltaic p	ower plant
project.	43
Table 4: Classification of potential impacts	
Table 5: Criteria for impact evaluation (DEAT, 2006)	
Table 6: Impact associated with dust pollution	47
Table 7: Impact associated with noise pollution	47
Table 8: Impact associated with safety and security	47
Table 9: Impact associated with waste generation	48
Table 10: Impact associated with groundwater contamination	48
Table 11: Impact associated with health and safety occupational	49
Table 12: Impact associated with increased informal settlement and associated	problems
,	49
Table 13: Impact associated with spreading of diseases such as HIV/AIDS	49
Table 15: Impact associated with heritage aspects	50
Table 16: Impact associated with stimulation of skills transfer	50
Table 14: Impact associated with flux into Gobabis	49
Table 17: Impact associated with employment creation	51
Table 18: Impact associated with health aspects	52
Table 19: Impact associated with economic aspects	52
Table 20: Impact of heritage significance	52
Table 21: Impact of ecological significance	52

Executive Summary

Oka Investment (Pty) Ltd and Benzel and Partners Investments (Pty) Ltd has been given rights to lease land in the municipal area of Gobabis in the Omaheke Region. Oka Investment (Pty) Ltd and Benzel and Partners Investments (Pty) Ltd is a Namibian owned company which has a primary focus on sustainable development for the benefit of all Namibians and future generations. The company is proposing to establish a 5 MegaWatts (MW) renewable photovoltaic solar power plant in Gobabis that will supply electricity to Nampower. The rationale for the development project is based upon the increase in the demand for electricity in the country due to the rapid industrial expansion. The boom in business activities in the country has lead to a demand in electrical services which have grown at a faster rate than expected. The envisaged project is located in the Omaheke Region in the eastern part of Namibia. The plant is to be set up within the Gobabis Townland itself.

Oka Investment (Pty) Ltd and Benzel and Partners Investments (Pty) Ltd is required to undertake an Environmental Impact Assessment (EIA) for the proposed construction of the renewable photovoltaic solar power plant within the framework of the existing environmental assessment process as described in the Environmental Management Act (2007) and its Regulation (2012), published by the Ministry of Environment and Tourism (MET). As part of the fulfilment of the requirements, Oka Investment (Pty) Ltd and Benzel and Partners Investments (Pty) Ltd has requested Centre for Geosciences Research cc as the Environmental Consultants to undertake the Environmental Impact Assessment (EIA) with respect to the proposed construction of a photovoltaic solar power plant.

The objectives of the EIA include an investigation and assessment of the likely short and long-term positive and negative environmental impacts of the proposed construction of the renewable photovoltaic solar power plant. The EIA also aims at clearly stipulating and determining the legal and regulatory framework and assess the relevance that these legislations will have with regard to the proposed project. The EIA also aims at addressing the public participation process where all Interested and Affected Parties (I&APs) comments/questions and concerns with regard to the proposed project are raised.

1. INTRODUCTION

1.1. Project Background

1.1.1. General Overview

It is well known that power in Namibia is mainly generated and supplied by Namibia Power Corporation (NamPower). Statistics indicate that Namibia has Africa's third highest electrification level at zero percent. The electrical sector in Namibia has the potential to become the driving force behind economic development.

Oka Investment (Pty) Ltd and Benzel and Partners Investments (Pty) Ltd has embarked upon this project of establishing a renewable photovoltaic power plant due to the mere fact that there is a great increase in the need and demand for electricity supply due to the rapid industrial expansion which has taken over the country. Oka Investment (Pty) Ltd and Benzel and Partners Investments (Pty) Ltd feels that through this project they can assist NamPower in executing their plans of increasing the electricity generating capacity and supply in the country.

As stipulated in the Government gazette announcing the commencement of the Environmental Management Act (2007) that an Environmental Impact Assessment be conducted for every energy generation, transmission and storage activities being undertaken. Oka Investment (Pty) Ltd and Benzel and Partners Investments (Pty) Ltd has thus appointed Centre for Geosciences Research cc to carry out the said assessment for the establishment of the photovoltaic solar plant.

1.2. Location of the Project

The envisaged project is located in the Omaheke Region in the eastern part of Namibia. The plant is to be set up within the Gobabis Townland itself (Figure 1). Gobabis is situated 220 km down the B6 motorway from Windhoek to Botswana. The town is 113 km from the Buitepos border post with Botswana, and serves as an important link to South Africa on the tarred Trans-Kalahari Highway (Figure 1).

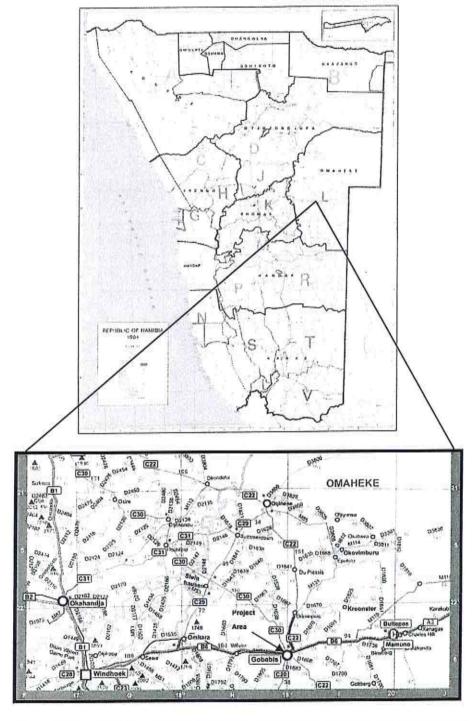


Figure 1: Location of the project area in Gobabis, Omaheke Region (Source: Maps of Namibia, 2012)

1.3. The objectives of the Environmental Assessment Process

The study will involve a process of investigating and assessing the possible long and short–term positive and negative environmental impacts that the proposed establishment of the renewable PV solar power plant in Gobabis will impose. The objectives of the environmental scoping study are to:

- > To prepare a thorough Scoping Environmental Impact Assessment (EIA) report that:
 - Describe the details of the activities to be undertaken for the proposed establishment of the renewable PV solar power plant.
 - Describe the current environmental conditions within the project area based on the available information.
 - Identifies potential positive and negative environmental impacts associated with the proposed project activities.
- To develop an Environmental Management Plan (EMP) based on the outcomes of this study in support of the environmental management of the proposed project.
- To introduce the proposed project to the Government, other stakeholders as well as Interested and Affected Parties (I&APs) to ensure that all key impacts and concerns are incorporated into the final Scoping Environmental Impact Assessment Report.

1.4. Terms of Reference

The term of reference for the proposed project was set out based on the requirement by the Environmental Management Act (2007) and its Regulation (2012) and the Nature Conservation Amendment Act (1996). The steps which were followed are described as follows:

- a) a description of all tasks to be undertaken as part of the assessment process, including any specialist to be included if needed:
- b) an indication of the stages at which the Environmental Commissioner is to be consulted;
- a description of the proposed method of assessing the environmental issues and alternatives; and
- d) the nature and extent of the public consultation processes to be conducted during the assessment process.

1.5. Scope of the Environmental Impact Assessment

The particular objectives of the EIA in line with the Terms of Reference are to:

- ➤ Comply with Namibia's Environmental Assessment Policy, Environmental Management Act (2007) and its Regulations (2012).
- > Confirm the justification of the project and to consider all alternatives that would meet the need.
- Consult all Interested and Affected Parties (I&APs) to ensure that their inputs are taken into account;
- Review the legal and policy framework and their relevant requirements for this project;
- Describe the biological, physical and socio-economic environments of the proposed project.
- Identify and assess impacts related to the construction and operation of the proposed establishment of the renewable PV solar power plant and to propose mitigation strategies
- Compile an Environmental Management Plan for the construction and operation of the proposed establishment of the renewable PV solar power plant.

The Environmental Assessment procedure as outlined in the Environmental Assessment Policy for Sustainable Development and Environmental Conservation (2008) is shown in (Figure 2) below:

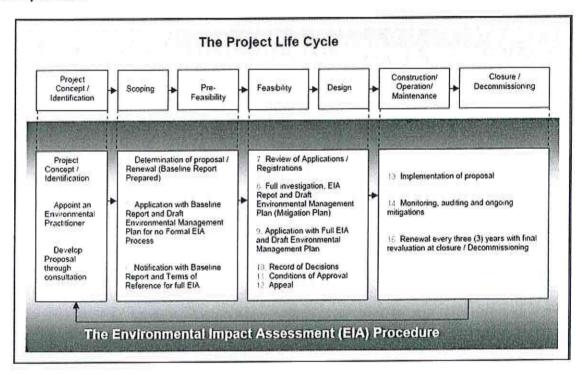


Figure 2: Environmental Assessment process in Namibia (Directorate of Environmental Affairs (DEA, 2008)

2.1. What is a photovoltaic solar power system?

Photovoltaic solar power is generated as a result of converting the sun's radiation energy into electricity that can be used to power electronics and other devices. Photovoltaic technology has gained significant popularity as an alternative energy source, and holds many financial and environmental benefits. Photovoltaics, translated directly from its Greek roots, means literally "light electricity." Although the term has only recently become common knowledge, the technology has been in the works since the 1940s and 1950s. Light energy has long been used to power small electronics such as calculators and wristwatches. However, the potential of photovoltaic technology is now being further exploited, in that it is used to generate electricity for home and commercial usage.

Solar panels, or photovoltaic panels, function to generate electrical energy from solar radiation (Figure 3). They are engineered to efficiently absorb radiation, and contain semiconductors to convert the energy. The semiconductors are normally made of silicon, and through a complex molecular interaction, change the energy state of the radiation such that it takes the form of usable electricity. The electricity is then transmitted through the wiring of the panels to power the energy needs of the home.

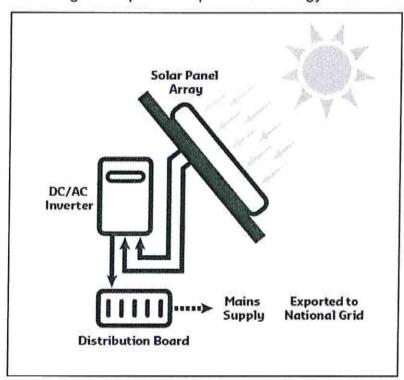


Figure 3: How the PV solar system works (Source: www.markgroup.co.uk)

2.2. Grid connected PV solar power systems

Being grid connected means that a solar photovoltaic system is linked directly to the available electrical grid or utility lines. A connected system comprises a photovoltaic panel or set of panels that directly convert sunlight into electricity. The size of the system dictates how independent from the grid it's possible to be. Grid connected systems need inverters to convert direct current into alternating current usable electricity. The inverter connects to the main electrical supply with a meter showing the number of generated kilowatt hours. Excess electricity can be sold back to the grid. This project is also a grid connected PV solar power system.

2.3. Advantages and disadvantages of PV solar power systems Advantages

- Photovoltaic (PV) systems provide green, renewable power by exploiting solar energy. We can use photovoltaic (PV) panels as an alternative energy source in place of electricity generated from conventional fossil fuels. Consequently, the more we use PV panels (or other renewable energy technologies) to cover for our energy needs, the more we help reduce our impact to the environment by reducing CO2 emissions into the atmosphere.
- Photovoltaic (PV) panels constitute a reliable, industrially matured, green technology for the exploitation of solar energy. Photovoltaic (PV) companies give valuable warranties for PV panels in terms of both PV panel life span (years of PV life) and PV panels' efficiency levels across time. PV panels can last up to 25 years or more, some with a maximum efficiency loss of 18% only, even after 20 years of operation.
- Unlike wind turbines, Photovoltaic (PV) panels operate autonomous without any noise generation as they do not incorporate any moving mechanical parts. In some cases photovoltaic (PV) panels may be mounted on adjustable rotating basis which is mounted on a fixed pole and allows some movement for better and longer solar tuning turning the solar panel to follow the sun. Even in this adjustable PV systems, the movements are very moderate, almost negligible, and do not generate any disturbances.

With respect to operating costs and maintenance costs, Photovoltaic (PV) panels, unlike other renewable energy technologies, require minimum operating or maintenance costs; just performing some regular cleaning of the panel surface is adequate to keep them operating at highest efficiency levels as stated by manufacturers' specs.

Disadvantages

- Perhaps the biggest disadvantage of Photovoltaic (PV) panels is their limited efficiency levels; compared to other renewable energy sources.
- Another disadvantage of Photovoltaic PV panels is that they produce direct electric current which must be converted to alternating current (AC) before it can be used for consumption (either to be transferred to the power grid, or directly for own consumption). To convert DC to AC, PV panel systems use inverters, expensive electronic equipment and with certain technological limitations, adding to the overall system's cost especially at larger power sizes.
- Some toxic substances, such as cadmium and arsenic, are used to create photovoltaic panels. These chemicals have the potential to cause pollution and environmental destruction if they're discarded improperly. Fortunately, they are also somewhat recyclable and their impact can be minimized through reuse and proper handling.

3.1. General Overview

Oka Investment (Pty) Ltd and Benzel and Partners Investments (Pty) Ltd proposes to construct a PV solar power plant that will produce electricity and supply to Nampower. The installation site is within the Gobabis municipal area (Figure 4). The area on which the license is granted provides a surface of about 29, 1915 Ha, sufficient to accommodate the plant in question. The land on which the supporting structures of the PV modules will be laid is flat and without cumbersome barriers that may prevent the correct installation of the photovoltaic field. There aren't also forests, trees, mountains or tall buildings that may in some way produce shadowing phenomena of the PV modules. It thus appears that, for the characteristics of the installation site, it is possible to freely choose as regards the orientation and inclination of the modules, as well as for the coefficient of filling of the two areas. This allows optimizing the laying and operating conditions, consequently maximizing the yield of the photovoltaic system. In (Figure 4) and (Figure 8) the installation site is shown. Gobabis is situated at an altitude of 1444m above sea level, and is characterized by a semi-arid climate (hot summers and dry winters).



Figure 4: The installation site for the proposed renewable PV solar power plant in Gobabis.

3.2. Physiography

3.2.1. Climate

Gobabis has a semi-arid climate with hot summers and cool winters (with mild days and chilly nights). The average annual precipitation is 370 mm. High temperatures are very common in the town due to the high sunshine hours in the town (Figure 5) and the average annual temperature is 28.3 °C.

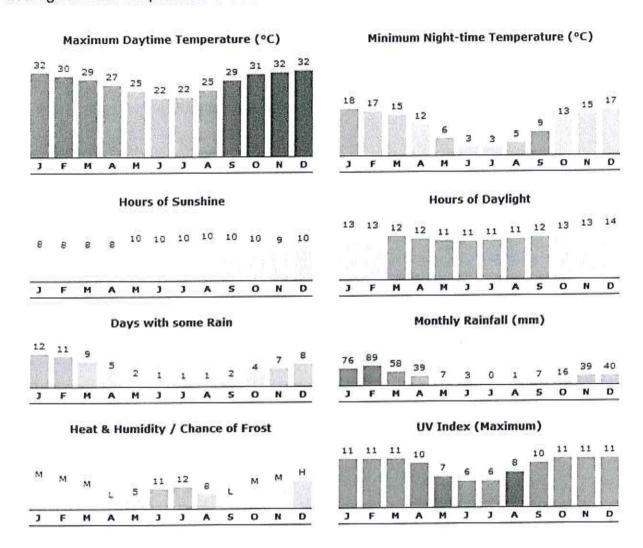


Figure 5: Climate conditions in Gobabis (Source: World Climate Guide)

3.2.2. Geology of the site

Regionally the project area belongs to the Nosib Group which is rather known to be a basal succession formed during the Damara orogen. The Nosib Group is laid down in or marginal to intracontinental rifts and it mainly consists of arenitic rocks like sandstones, quartzites, conglomerates and subordinate schists (Miller, 1992)

The geology in the Gobabis area is also comprised of the Kamtsas Formation which is made up of Kamtsas quartzite (Damara Sequence) and sediments of the Kuibis Subgroup (Nama Group), locally overlain by tillite and shale of the Dwyka Formation (Karoo Sequence) (Figure 6)

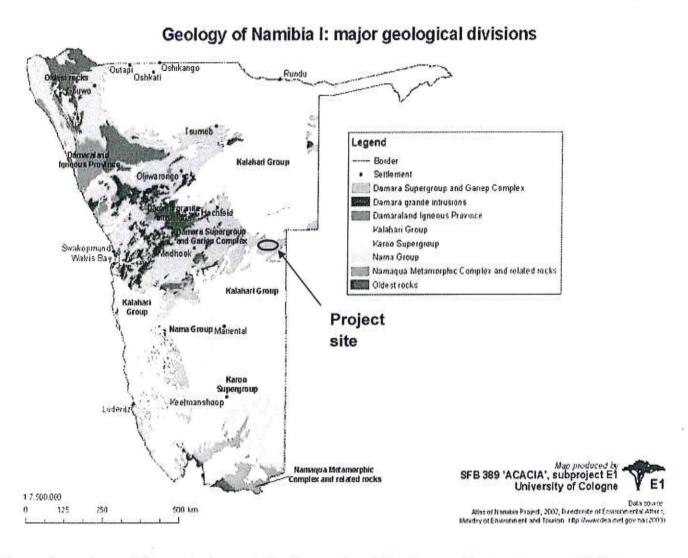


Figure 6: geology of the project area indicating rocks of the Damara Supergroup as well Nama Group rocks

3.3. Rationale for the proposed site

The Gobabis town has been chosen as the proposed locality for the project because of the high average monthly sun hours in Gobabis (Figure 7). As we know sunshine is a very important aspect of the proposed project. The strength of the sun's ultraviolet (UV) radiation is expressed as a solar UV index. The UV Index for Gobabis is averaged at 12 on a daily basis which is determined to be very high (www.weatheronline.com).

An explanation for the high sun radiation in Gobabis can be due to the mere fact that the town is found at a high altitude of up to 1444 m (amsl) and it has been established that there is less atmosphere at higher altitudes to absorb certain radiations especially UV rays therefore implying more sunshine.

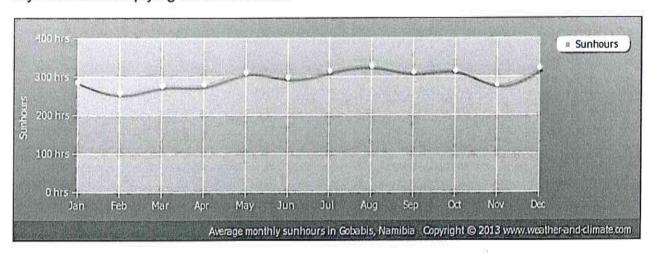


Figure 7: Average monthly sunshine hours in Gobabis, Omaheke Region (Source: www.weather-



Figure 8: The site where the proposed PV solar power plant is to be constructed (Source: Google Map)

3.4. Proposed project details

The project consists of several stages: the assessment of the environmental parameters of the installation site, the size of sub-components of the solar PV array, the size of the MV/LV transformers of the various subfields, sizing of MV lines and their parallel until the primary transformer station MV/AV.

The geographic coordinates of Gobabis are 22° 26′ 21.97″ S, 18° 58′ 7.33″ E. This means that the optimal orientation and tilt of the PV system are as follows:

- Orientation 180° to the South, ie 0° to the North;
- 20° tilt.

Considering the composition of the soil and the extremely arid climate, it is easy to assume that the environment is dusty. The dust deposited on PV modules could reduce the yield and, if a regular cleaning is not performed, the reduction may become relevant.

The 5MW PV solar power system will be made up of subfields that will produce the same amount of solar power each. The subdivision of the PV power plant in various subfields highlights one of the advantages of photovoltaic generators, their modularity. Furthermore, this choice surely advantages the reliability of operation and so productivity of the plant: in fact, in the case of out of service of one of the subfields, the remaining ones continue to operate in an independent way, by limiting the disruption to one part of the facility.

4. LEGAL AND REGULATORY FRAMEWORK

The management and regulation of electricity generating activities falls within the jurisdiction of the Ministry of Mines and Energy (MME), specifically the Electricity Control Board. Environmental regulations are guided and implemented by the Directorate of Environmental Affairs (DEA) within the Ministry of Environment and Tourism (MET) following the guidelines of the Environmental Management Act (No. 7 of 2007).

It is the responsibility of the proponent in this case Oka Investment (Pty) Ltd to have a comprehensive inventory and understanding of all relevant legislations and determine the relevance of these legislations to the proposed project. The interpreted understanding of the legislation provides the background for management and mitigation of all environmental impacts. The Environmental Management Act (2007) requires due process to be followed, essentially that all project related regulatory requirements are identified, scoped (public participation), mitigated and conformed with. The project legal requirements are evaluated in terms of the National legislation, guidelines and policies.

4.1. Namibian Legislation, Guidelines and Policies

4.1.1. The Namibian Constitution

Article 91 defines the function of the Ombudsman and 91 (c) describes the duty to investigate complaints concerning the over-utilisation of living natural resources, the irrational exploitation of non-renewable resources, the degradation and destruction of the ecosystem and failure to protect the beauty and character of Namibia.

Article 95 (I) states that 'the State shall actively promote and maintain the welfare of the people by adopting, inter alia, policies aimed at ... maintenance of ecosystems, essential ecological processes and biological diversity of Namibia and utilization of natural resources on a sustainable basis for the benefit of all Namibians both present and future; in particular the Government shall provide measures against the dumping or recycling of foreign nuclear and toxic waste on Namibian Territory.'

Article 100 states that 'the land, water and natural resources below and above the surface of the land ... shall belong to the State if they are not otherwise lawfully owned.'

4.2. Legal instruments relevant to this project

There are various legal instruments that are advocates for the effects of electricity generation on the environment. (Table 1) below shows the summaries of the legislation that are relevant to this project.

Table 1: Legal instruments relevant to this project.

Topic	Legislation	Provisions	Regulatory Authority
Electricity Generation	Electricity Act 2007	The Electricity Act of 2007 provides the requirements and conditions involved in obtaining licenses for the provision of electricity; also to provide for the powers and obligation of the licensees; and to provide for incidental matters.	Ministry of Mines and Energy
Environmental Impact Assessment	Environmental Management Act of 2007 and EIA regulation of 2012	Provides list of activities that require an environmental assessment, including: Mining and Quarrying. Activities such as exploration or prospecting for minerals or dimension stone, mining for minerals or dimension stone. The Act also provides procedures for adequate public participation during the environmental assessment process for the interested and affected parties to voice and register their opinions and concern about a project.	Ministry of Environment and Tourism
Hazardous Substance such as used oil which (e.g. diesel)	Hazardous Substance Ordinance 14 of 1974	The Act provides for the control of substances which may cause injury or ill-health to or death of human beings by reason of their toxic, corrosive, irritant, strongly sensitizing or flammable nature or the generation of pressure thereby in certain circumstances; to provide for the prohibition and control of the importation, sale, use, operation, application, modification, disposal or dumping of such substance; and to provide for matters connected therewith"	Ministry of Health and Social Services
Fauna and flora	The Nature Conservation Ordinance, Ordinance of 1975,	In the course of the Mine's activities, care must be taken to ensure that protected plant species and the eggs of protected and game bird species are not disturbed or destroyed. If such destruction or disturbance is inevitable, a permit must be obtained in this regard from the Minister of Environment and Tourism. For this project, due to it areal extend and location outside a protected area a permit will not be required.	Ministry of Environment and Tourism (MET)

Topic	Legislation	Provisions	Regulatory
			Authority

			Section 1
Employees	The Labour Act, 2007 (Act No. 11 of 2007)	The Labour Act gives effect to the constitutional commitment of Article 95 (11), to promote and maintain the welfare of the people. This Act is aimed at establishing a comprehensive labour law for all employees; to entrench fundamental labour rights and protections; to regulate basic terms and conditions of employment; to ensure the health, safety and welfare of employees	Ministry of Labour and social welfare
Archaeological sites	National Heritage Act 27 of 2004 Ministry of Youth	This Act provides provisions for the protection and conservation of places and objects of heritage significance and the registration of such places and objects. The proposed exploration project will ensure that if any archaeological or paleontological objects, as described in the Act, are found in the course of its construction, mining operations or closure that such find be reported to the Ministry immediately. If necessary, the relevant permits must be obtained before disturbing or destroying any heritage.	National Service, Sport and Culture
Desertification	United Nation Convention to Combat Desertification 1992	The convention objective is to forge a global partnership to reverse and prevent desertification/land degradation and to mitigate the effects of drought in affected areas in order to support poverty reduction and environmental sustainability	United Nation Convention
Biodiversity	Convention on Biological Diversity (CBD) 1992	This convention advocates for the conservation of biological diversity, the sustainable use of its components and the fair and equitable sharing of the benefits arising out of the utilization of genetic resources.	United Nation Convention

4.2.1. Electricity Act No. 4 of 2007

The Act stipulates the establishment of the Electricity Board and for its powers and functions. It further provides for the requirements and conditions for obtaining licences for the provision of electricity, and for the powers and obligations of licensees and to provide for incidental matters.

The objective of the Act is laid down in its Section 3 which is to exercise control over and regulate the provision, use and consumption of electricity in Namibia through the Electricity Control Board (ECB) as well as to oversee the efficient functioning and development of the electricity industry and security of electricity provision. The Act under its Section 21 states that the applicant has to submit an Environmental Impact Assessment study indicating the extent of any potential damage to or pollution of the environment and the steps proposed to prevent such damage or pollution and to restore the environment generally and in terms of existing environmental legislation. It is for this reason that OKA Investment (Pty) Ltd has appointed Centre for Geosciences Research cc to undertake the EIA study for the proposed renewable solar power plant in Gobabis.

4.2.2. Environmental Legislation

4.2.2.1. Environmental Management Act No. 7 of 2007

The Environmental Management Act No. 7 of 2007 is an important tool in terms of environmental protection. The Act requires adherence to the principle of optimal sustainable yield in the exploitation of all natural resources. The Act gives effect to Article 95 (I) of the Namibian Constitution by establishing general principles for the management of the environment and natural resources. It promotes the coordinated and integrated management of the environment The Act promotes inter-generational equity in the utilisation of all natural resources. Environmental impact assessments and consultations with communities and relevant regional and local authorities are provided for, to monitor the development of projects that potentially have an impact on the environment. According to the Act, Namibia's cultural and natural heritage is required to be protected and respected for the benefit of present and future generations. In order to promote the sustainable management of the environment and the use of natural resources, the Act has established a bundle of principles for decision-making on matters affecting the environment. The objective of the Act is laid down in its Section 2, which is to prevent and mitigate, on the basis of the principles set out in section 3, the significant effects of activities on the environment.

4.2.2.2. Environmental Impact Assessment Regulations No. 30 of 2012 of the Environmental Management of 2007

Environmental Impact Assessment Regulations No. 30 of 2012 of the Environmental Management Act No. 7 of 2007 lists activities which may not be undertaken without environmental clearance certificate and hence are subject to an environmental assessment process. It is for these reasons that an environmental assessment should be undertaken to identify the fatal flaws associated with the various activities to be undertaken. The act also provides procedures for adequate public participation during the environmental assessment process for the interested and affected parties to voice and register their opinions and concern about a project.

4.2.3. Legislations on Biodiversity

4.2.3.1. Nature Conservation Ordinance 4 of 1975 (as amended 1996)

The Nature Conservation Ordinance deals with conservation by providing for the declaration of protected habitats as national parks and reserves, and for the protection of scheduled species wherever they occur. The Ordinance also applies to the manufacture, sale, use, disposal and dumping of hazardous substances, as well as their import and export and is administered by the Minister of Health and Social Welfare. Its primary purpose is to prevent hazardous substances from causing injury, ill-health or the death of human beings.

4.2.3.2. United Nation Convention to Combat Desertification (1992)

The convention objective is to forge a global partnership to reverse and prevent desertification/ land degradation and to mitigate the effects of drought in the affected areas in order to support poverty reduction and environmental sustainability.

4.2.3.3. Convention on Biological Diversity (CBD) (1992)

This convention advocates for the conservation of biological diversity, the sustainable use of its components and the fair and equitable sharing of the benefits arising out of the utilization of genetic resources.

4.2.4. National Heritage Act No. 27 of 2004

The Heritage Act of 2004 makes provision for the developer to identify and assess any archaeological and historical sites of significance. The existence of any such sites should be reported to the Monuments Council as soon as possible. The Council may serve notice that prohibits any activities as prescribed within a specified distance of an identified heritage/archaeology site.

4.2.4.1. Cradle to Grave Responsibility

This principle provides that those who manufacture potentially harmful products should be liable for their safe production, use and disposal and that those who initiate potentially polluting activities should be liable for their commissioning, operation and decommissioning.

4.2.4.2. Precautionary Principle

There are numerous versions of the precautionary principle. At its simplest it provides that if there is any doubt about the effects of a potentially polluting activity, a cautious approach should be adopted.

4.2.4.3. The Polluter Pays Principle

A person who generates waste or causes pollution should, in theory, pay the full costs of its treatment or of the harm, which it causes to the environment.

4.2.4.4. Public Participation and Access to Information

In the context of environmental management, citizens should have access to information and the right to participate in decisions making.

4.2.5. Legislations for health and safety

4.2.5.1. Regulations for the Health and Safety of Employees at Work of the Labour Act of 2007 (amended 2011)

The Regulations relating to Health and Safety at the Workplace in terms of the Labour Act No. 11 of 2007 came into force on 31 July 1997. These regulations prescribe conditions at the workplace, and *inter alia* deal with the following:

- Welfare and facilities at work-places, including lighting, floor space, ventilation, sanitary and washing facilities, usage and storage of volatile flammable substances, fire precautions, etc.
- Safety of machinery.
- Hazardous Substances including precautionary measures related to their transport, labelling, storage, and handling. Exposure limits, monitoring requirements, and record keeping are also covered.
- Physical hazards including noise, vibration, ionizing radiation, non-ionizing radiation, thermal requirements, illumination, windows and ventilation.
- · Requirements for protective equipment.
- Emergency arrangements.
- Electrical safety

5. AFFECTED ENVIRONMENT

5.1. Socio-Economic Environment

According to (Namibian Statistics Agency, 2011) the population size of the country had increased from 1.8 million in 2001 to 2.1 million in 2011. There had also been an increase in the population density from 2.1% in 2001 to 2.6% in 2011. These statistics are a clear indication there is a demand in electricity usage due to the increase in population size.

In terms of housing conditions in the country households with electricity for lighting were found to be 42% and those that use wood/charcoal for cooking were 52%. This gives an indication that there is a definite need for electricity generation projects in order to cater for the demands of the population in the country; this also in turn contributes to the development towards vision 2030.

It is also stated in the (Namibian Statistics Agency, 2011) report that the households of the Omaheke region depend on wages and salaries, farming, business or non-farming activities, pension and cash remittance as their main source of income. About 49 % of the population depends on wages and salaries. Therefore this project will serve as a great opportunity to contribute to these wages and salaries of those seeking temporary and permanent employment through the activities of the proposed PV solar power plant in Gobabis. Only a small percentage depends on cash remittance and business or non-business activities, which is the lowest dependency in the area adding up to 6 % and 7% respectively, in the year 2011. The dependency of the residents on pension only adds up 13% of the total population.

5.2. Biophysical Environment

5.2.1. Biodiversity (Fauna and Flora)

A desktop study (literature review) was conducted on the flora and the vertebrate fauna expected to occur in the Gobabis area (Omaheke Region) in eastern Namibia. An extensive literature review of the plant species as well as the reptiles, amphibians, mammals and birds expected to occur in the general Gobabis area was conducted using as many relevant literature as possible.

Flora

The project area belongs to the camelthorn savanna according (Mendelsohn, 2012) (Figure 10). The camelthorn savanna (300-400 mm rainfall) of the central Kalahari is an open savanna with Acacia erioloba as the dominant tree (Figure 9). Common shrubs include Acacia hebeclada, Ziziphus mucronata, Tarconanthus camphoratus, Grewia flava, Ozoroa paniculosa and Rhus ciliata. There is a good grass cover but of course, unpalatable grasses such as Eragrostis pallens and Aristida stipitata. Schmidtia kalahariensis is an indicator of veld deterioration.

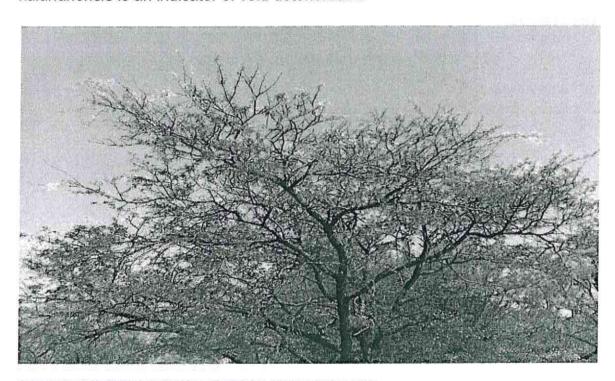


Figure 9: Vegetation in the surrounding of proposed area

Distribution of vegetation types in Namibia Katima Mulilo Oshakati Otavi Grootfontein Project Area Windhoe Vegetation Type Valvis Bay Northern Namit Rehobo Central Namib Southern Namib Desert and succulent steppe Semi-desert and savanna transition Mountain savanna and karstveld Thornbush savanna Highland savanna Keetmanshoo Saline desert with dwarf shrub savanna Forest savanna and woodland Camelthorn savanna Mixed tree and shrub savanna Oranjemand 50 100 200 Source of data National Atlas of SWA/Namibia (1983). Map prepared by Geological Survey ofNamibia Kilometers

Figure 10: Vegetation in the project area (Source: National Atlas of Namibia)

15 0'0'E

Fauna

There is no wildlife or fauna as per say within the area of the proposed PV solar power plant which is the Gobabis Townland itself. Nevertheless, the surrounding areas in general are sustained by livestock animals such as cattle, sheep, goats, horses etc. and wildlife such as lions, cheetahs, leopards, caracal, eagles, meercats, mongoose, zebras, baboons, African wild dogs, springboks etc (Figure 11).

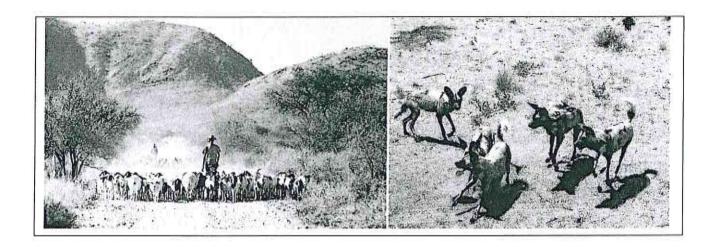


Figure 11: Small stock animals such as sheep and wildlife such as hyenas in the surroundings.

5.2.2. Groundwater and surface water hydrogeology

The hydrology of Namibia is characterized by the semi-arid to arid climate, and has very limited occurrences of surface water.

The project area is hydrogeological situated within the Hochfeld-Dordabis-Gobabis Area (Figure 12), which stretches from east of Windhoek to the eastern borders of Namibia. The area mainly includes the sandvelds between the Kalahari basins of northern Omaheke- Epukiro and the Stampriet artesian basin (Christelis and Struchmier, 2001).

Both alluvial and fractured aquifers occur in the area. The alluvial aquifers are mainly found along the riverbeds of the Seeis River and along most of the course of the white Nossob. The north-eastern side of Gobabis has porous aquifers consisting of the Kalahari sediments overlying the quartzites. The secondary fractured aquifers in the area are generally hosted in the faults and other secondary structures and are more prevalent in competent rocks like the sandstones and quartzites. The fractured aquifers in the basement rocks and the porous aquifers from the saturated Kalahari sediments are some of the aquifers supplying water to the Gobabis area. The fractured aquifers in the area have relatively moderate to high yields and receive fairly regular recharge (Christelis and Struchmier, 2001).

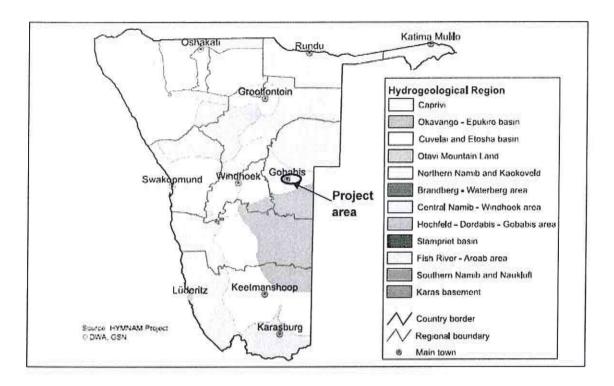


Figure 12: Hydrogeological Regions of Namibia (Christelis and Struchmier, 2001).

The area comprises of two main rivers, the Auob and Nossob (black and white) rivers. There are several tributaries (smaller rivers) including the olifants, see and skaap. Two dams (Daan and Tilda Viljoen) were built on the Black Nossob River, while the Otjivero Dam was built on the white Nossob river all supplying water to Gobabis.

Gobabis water supply

Originally Gobabis obtained water from boreholes within the town and townlands. Later the scheme was extended to the Witvlei area and the White Nossob. More recently the Otjivero Dam was constructed to assure a more permanent water supply for Gobabis. The borehole schemes at South Station and Grünental were then rested. Due to inconsistent rainfall, however, the dam was dry for several seasons in the early 1990s and a hydrogeological investigation for additional boreholes started in 1995. The old boreholes were also re- evaluated and following a detailed investigation a new well field of eight boreholes was established north-east of the town, close to the Black Nossob River. Fractured aquifers were identified in the basement and porous aquifers in saturated Kalahari sediments. These can form a combined aquifer system in some places (Christelis and Struchmier, 2001).

5.3. Potential impacts identified

Social impacts of the activities of the project are likely to be minimal and tend to be positive. A clear understanding of these impacts may help communities understand and anticipate the effects of the project. One of the major possible impacts of the project is the generation of electricity which is a very important impact that will benefit many people in the long-run. The following is the summary of the likely positive and negative impacts for this project:

5.3.1. Positive Impacts

- Power generation
- Employment creation during construction and operation
- Increase in income levels
- Increase in training and skills development opportunities
- VAT payment
- Reduction of Carbon Dioxide gas emissions into the atmosphere
- No air, water, noise pollution

5.3.2. Negative Impacts

- Visual impacts
- Solid waste: wires, drill bites, & human waste (Temporal)
- Disturbance of the Fauna and Flora during construction (Minimal)
- Possible land disturbance (Minimal).
- Solar panels contain toxic substances such as (cadmium and arsenic) which can get into the environment, harmful substances.

6. PUBLIC CONSULTATION PROCESS

6.1. Legal and policy requirement

6.1.1. Environmental Management Act (2007) and it EIA regulations (2012)

Public consultation is a crucial part of the EIA process. This provides an opportunity to stakeholders or interested member of the public to find out more about what is being proposed, and to raise any issues or concerns. The Environmental Management Act 2007 and its EIA regulations of 2012 are the key documents governing environmental impact assessment in Namibia.

One of the key objectives of the Act is to prevent and mitigate the significant effects of activities on the environment by:

"Ensuring that there are opportunities for timeous participation of interested and affected parties throughout the assessment process; and ensuring that the findings of an assessment are taken into account before any decision is made in respect of activities."

The key principle of the Environmental Management Act 2007 advocates for public participation. The principles states that "the participation of all interested and affected parties must be promoted and decisions must take into account, the interest, needs and values of interested and affected parties".

Section 21 of the EIA Regulations outlines procedure on public participation process as follows:

- "(2). The person conducting a public consultation process must give notice to all potential interested and affected parties of the application which is subjected to public consultation by:
- a) Fixing a notice board at a place conspicuous to the public at the boundary or on the fence of the site where the activity to which the application relates is or is to be undertaken;
- b) Giving written notice to:
- The owners and occupiers of land adjacent to the site where the activity is or is to be undertaken or to any alternative site;

- ii. The local authority council, regional council and traditional authority, as the case may be, in which the site or alternative site is situated;
- iii. Any other organ of state having jurisdiction in respect of any aspect of the activity; and
- c) Advertising the application once a week for two consecutive weeks in at least two newspapers circulated widely in Namibia.
- (3) A notice, notice board or advertisement referred to in sub regulation (2) must -
- a) Give details of the application which is subjected to public consultation; and
- b) State:
- i. That the application is to be submitted to the Environmental Commissioner in terms of these regulations:
 - ii. The nature and location of the activity to which the application relates;
 - iii. Where further information on the application or activity can he obtained: and
- c) The manner in which and the person to whom representations in respect of the application may be made.
- (6) When complying with this regulation, the person conducting the public consultation process must ensure that **a)** information containing all relevant facts in respect of the application is made available to potential interested and affected parties; and **b)** consultation by potential interested and affected parties is facilitated in such a manner that all potential interested and affected parties are provided with a reasonable opportunity to comment on the application.
- 28. For the purpose of the Act and these regulations a notice is given to a person or a person is informed of a decision, if a document to that effect is:
- (a) Delivered personally to that person;
- (b) Sent by registered post to the persons last known address;
- (c) Left with an adult individual apparently residing at or occupying or employed at the person's last known address; or
- (d) In the case of a business-

- (i) Delivered to the public officer of the business;
- (ii) Left with an adult individual apparently residing at or occupying or employed at its registered address;
- (iii) Sent by registered post addressed to the business or its public officer at their last known addresses; or
- (iv) Transmitted by means of a facsimile transmission to the person concerned at the registered office of the business.

6.2. Consultation process followed during the EIA process

Communication with stakeholders about the proposed small scale surface mining project was facilitated through the following ways

- Identification of stakeholders
- Newspaper adverts
- Written notices
- Notice boards
- Information documents
- Stakeholder meetings
- Reasonable opportunity for the public to register and comment on the project



Figure 13: Invitations to the public to attend the meeting were put up on notice boards at strategic places in Gobabis.

(Table 2) below explains how the communication process was facilitated using the above mentioned ways.

Table 2: Public consultation process

Steps	Description of the process	Time allowed
Identification of stakeholders	Key stakeholders were identified and included in the register. Contact details for some I&APs were obtained from their offices and others at the meeting	The registration process was maintained throughout the EIA process
Newspaper adverts	Notices were placed in the press, briefly explaining the project and its locality, inviting the public to register as stakeholders and informing them of the time and venue of the public meeting. (Appendix A)	On the 22 nd October 2014 in the Namibian Newspaper. On the 21 st October 2014 in the Republikein Newspaper.
Written Notices	Written notices were provided to the relevant authority such as the Gobabis Municipality, Environmental Wardens.	Letters were sent two weeks before the public meeting
Notice boards	Posters were placed at strategic places in Gobabis Town (Appendix B)	Put up two weeks before the meeting
Background Information Document	A Background Information Document (BID) was compiled. The BID contained the information of the project (Appendix D). The BID was forwarded to all authorities and registered stakeholders.	Continued throughout the process every time someone registered.
Meetings	A consultation meeting was held at Nossobville Community Hall in Gobabis. The list of register can be found in (Appendix C)	Public meeting held on the 31 st October 2014. Two weeks were allowed for registrations before the public meeting.

6.3. Limitation of the public consultation process

Delivery of letters, Notice Board Posters and BID by hand is timing consuming.

- Most people were on leave and sometimes not reachable on the contact numbers when the Centre for Geosciences research cc was contacting them.
- Some stakeholders don't have access to email.

6.4. The interested and affected parties (I& APs)

The I&APs for this project were identified using information from the existing CENTRE FOR GEOSCIENCES RESEARCH stakeholder database. Notices were placed in various newspapers inviting the public to register as interested and affected parties. Organizations were also selected whom the consultant considered to be interested in or affected by this particular project. An I&APS can be defined as '(a) any person, group of persons or organization interested in or affected by an activity; and (b) any organ of state that may have jurisdiction over any aspect of the activity.

6.5. Outcome of the public consultation meeting

The Ministry of Environment and Tourism and Municipality of Gobabis as well as other stakeholders such as Nampower were invited to attend the scheduled public meeting in Nossobville. Numerous expressions and comments were given at the meeting in support of the proposed project and thus no objection (Figure 14). Numerous expressions were also given via email with no objections. There is no objection to the proposed project to establish a renewable PV solar power plant in Gobabis. The list of attendees to the meeting can be found in Appendix C.

6.6. Key issues identified during the public participation process

During the public participation process the following key issues were identified:

- > Employment opportunities at the plant
- > The duration of the EIA process
- > Operation of the PV solar power plant

The identified key issues during the public participation process together with the issues identified in section 5 above were assessed for potential impacts in section 7 below.

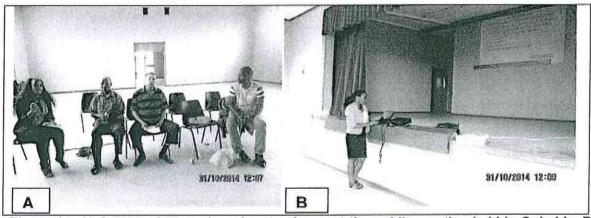


Figure 14: A) Community members in attendance at the public meeting held in Gobabis, B) Centre for Geosciences Research cc environmental expert Ms Anna David giving the presentation of the EIA process for the proposed project.

7. VISUAL IMPACT ASSESSMENT

Visual impacts are a subset of landscape impacts. Visual impacts relate to the changes that arise in the composition of available views as a result of changes to the landscape, to people's responses to the changes, and to the overall effect with respect to visual amenity. Visual impact is therefore measured as the change to the existing visual environment (i.e. views) caused by the intervention and the extent to which that change compromises (negative impact) or enhances (positive impact) or maintains the visual quality of the scene as perceived by people visiting, working or living in the area.

This approach reflects the layman's concerns, which normally are:

- · Will I be able to see the new development?
- · What will it look like?
- Will the development affect views in the area and if so how?

Landscape and visual impacts do not necessarily coincide. Landscape impacts can occur with the absence of visual impacts, for instance where a development is wholly screened from available public views, but nonetheless results in a loss of landscape elements and landscape character within a localized area (the site and its immediate surrounds).

7.1 Intensity of Visual Impact

The intensity of visual impact is determined using visual intrusion, visibility and visual exposure criteria (Hull and Bishop, 1988), qualified by the sensitivity of viewers (visual receptors) towards the proposed development. The intensity of visual impact is therefore concerned with:

 The overall impact on the visual amenity, which can range from degradation through to

enhancement;

- The direct impacts of the mine upon views of the landscape through intrusion or obstruction;
- · The reactions of viewers who may be affected.

7.2 Significance of Visual Impact

The significance of impact was determined based on the Hacking method of determination of the significance of impacts. This method also complies with the method provided in the EIA guideline document.

Significance = consequence x probability

Consequence is a function of severity, spatial extent and duration

Severity, based on

- Intensity of impact (will the impact be of High, Moderate or Low intensity?) and
 Scale/ spatial extent of impact
- Will the impact affect the national, regional or local environment, or only that of the site?
 Occurrence duration, based on
- Duration of occurrence (how long may it last).

7.3 Methodology

The following method was used:

- Site visit. A field survey was undertaken and the study area scrutinized to the extent that the receiving environment could be documented and adequately described;
- Project components. The physical characteristics of the project components were described and illustrated;
- Describe and map the landscape character of the study area. The description of the landscape focused on the nature and character of the landscape rather than the response of a viewer;
- Describe the quality of the landscape. Aesthetic appeal is described using recognized contemporary research in perceptual psychology as the basis;
- Describe the sense of place of the study area as to the uniqueness and distinctiveness
 of the landscape. The primary informant of these qualities is the spatial form and
 character of the natural landscape together with the cultural transformations associated
 with the historic/current use of the land;

- Illustrate, in very basic simulations, the proposed project overlaid onto panoramas of the landscape, as seen from nearby sensitive viewing points to give the reviewer an idea of the scale and location of the proposed project within their landscape context;
- Determine precise visual intrusion (contrast) of the proposed project by simulating its physical appearance from sensitive viewing areas;
- Determine the visibility of the proposed project by conducting detailed view shed analyses;
- Rate the impact on the visual environment and sense of place of the proposed mine based on a professional opinion and the method described below; and
- Suggest measures that could mitigate the negative impacts of the proposed mining project.

7.5 Description of the project

Construction Phase

Construction activities are those activities which will take place during the establishment and construction of the renewable photovoltaic solar power plant.

The following activities will occur during the construction phase:

- · Site clearing:
- Topsoil stripping;
- Development of a construction camp and associated facilities;
- Construction of permanent access routes within the site;
- Construction of a photovoltaic power plant;
- Obtaining borrow material for construction;
- Power supply for construction;
- · Water supply for construction

The following facilities will be developed during the construction phase:

- Workshop and maintenance area;
- Stores for storing and handling fuel, lubricants, solvents, paints and construction materials;
- · Contractors lay-down area/s;
- Mobile site offices;

- · A canteen;
- A temporary waste collection and storage area;
- A wash bay for washing equipment and vehicles;
- · A parking area for cars and equipment;
- · Change houses.

Operational Phase

The operational phase will consist of the following facilities:

- Renewable power plant;
- · Workshops and associated structures such as stores, changing rooms, etc;

7.6 Visual Receptors

Views

The proposed project site is located within the boundaries of Gobabis municipality. The project site is surrounded by the Trans Kalahari Highway and the residential on the north. The south, east and west of the project site is surrounded mainly by vegetation.

Sensitive Viewer Locations

As previously mentioned the proposed study area is located just inside the municipal border of the Gobabis town. The project itself will be erected close to the residential and industrial area of Gobabis in close vicinity of the bypass road (Trans-Kalahari Highway) (Figure 8) and therefore the most sensitive viewers will be the residents living in the area surrounding the project site and the Trans Kalahari Highway road users (Table 3).

Non - Sensitive Viewer Locations

The least sensitive receptors are likely to be people engaged in activities that focuses on their work or activity and who therefore may be potentially less susceptible to changes in their views (Institute of Environmental Assessment & The Landscape Institute, 1996).

Table 3: Potential Sensitivity of Visual Receptors - Renewable photovoltaic power plant project.

High Gobabis residence surrounding the project site and the road users travelling along the Trans- Kalahari highway	Moderate	Low Viewers visiting the power plant and living at a further distance from the site.
Users of all outdoor recreational facilities including public rights of way (tourist routes), whose intention or interest may be focused on the landscape; Communities where the development results in changes in the landscape setting or valued views enjoyed by the community;	People engaged in outdoor sport or recreation (other than appreciation of the landscape, as in landscapes of acknowledged importance or value); People travelling through or past the affected landscape in cars, on trains or other transport routes;	The least sensitive receptors are likely to be people at their place of work, or engaged in similar activities, whose attention may be focused on their work or activity and who therefore may be potentially less susceptible to changes in the view (i.e. office and industrial areas).

Visibility

In determining the visibility of the project, the worst-case scenario i.e. visibility of the project's features at a variety of heights and locations, was used. To do this, vantage points were assigned at offsets equivalent to the height above ground level of the proposed project. The 'zone of potential influence' (the area defined as the radius about the centre point of the project beyond which the visual impact of the most visible features will be insignificant) was established at 10km. Over 10km the impact of the proposed renewable photovoltaic solar power plant is insignificant due to the diminishing effect of distance and atmospheric conditions (haze) on visibility.

A viewshed analysis was undertaken for the solar panels (with a maximum height of 131m for the m) as this would be mounting the most visible feature of the power plant (solar panels). The viewshed analysis for the renewable photovoltaic solar power plant project indicates that the project will be highly visible from approximately 70 - 80% of the 'zone of potential influence' which are the residential area in the surrounding area and the Trans-Kalahari Highway.

7.7 Mitigation Measures

In considering mitigating measures there are three rules that were considered - the measures should be feasible (economically), effective (how long will it take to implement and what provision is made for management / maintenance) and acceptable (within the framework of the existing landscape and land use policies for the area). To address these, the following principles have been considered:

- Mitigation measures should be designed to suit the existing landscape character and needs of the locality. They should respect and build upon landscape distinctiveness.
- It should be recognized that many mitigation measures, especially the establishment of planted screens and rehabilitation, are not immediately effective.

Mitigation measures would relate mostly to 'good housing keeping issues and will not be sufficient to significantly reduce the impact of the proposed construction of a renewable photovoltaic solar power plant. To this end we nevertheless propose that the following activities be implemented.

Earthworks

- Re-vegetate the area; grow palm trees around the renewable photovoltaic solar power plant at a distance of 50 m away from the power plant.
- Dust suppression techniques should be in place at all times during the construction/ start-up, the decommissioning and closure phases.
- A professional Landscape Architect should assist with the final design of the power plant.

8. IMPACT ASSESSMENT

The purpose of this section is to assess and identify the potential positive and negative environmental impacts associated with the proposed development of a renewable photovoltaic (PV) solar power plant and to provide possible mitigation measures that are expected from construction, operational and decommissioning activities of the project. The following summarises some impacts identified, following the site investigation visit and from comments received from I&APs:

- Destruction of flora and displacement
- Visual impacts
- Health impacts
- Cumulative impacts
- Power generation
- Reduction of Carbon Dioxide gas emissions into the atmosphere
- Possible land disturbance
- Heritage impacts
- Noise impacts

These identified impacts will be assessed and evaluated in different phases of the development. Mitigation measures are also proposed for different impacts. Such assessment is also a requirement in term of Section 26(1) (g) and (26) (i) (iii) of the Environmental Assessment Regulations (MET, 2009).

8.1 Proposed Development Environmental Impact Evaluation

There are three different phases that are associated with the proposed development. Firstly the construction has to take place before construction can commence. In the construction section the different stages of the development as well as their potential impacts will be discussed. Impacts which may arise during the operation phase as well as potential decommissioning related impacts will also be discussed. Possible mitigation measures are also put forward for the potential impacts identified.

8.2 Classification of potential impacts

An appraisal of the type of effect of the proposed Renewable Photovoltaic (PV) Solar Power Plant would have on the affected environment; rate as either positive (beneficial

on the environment), neutral (no impact on the environment), or negative (adverse impact on at a cost of the environment).

Table 4: Classification of potential impacts

Term	Definition				
Positive Impact	An impact that is considered to represent an improvement on the baseline or introduces a positive change. No impact on the environment				
Neutral Impact					
Negative Impact	An impact that is considered to represent an adverse change from the baseline, or introduces a new undesirable factor				

Consequences of the impact are calculated as the average sum of the ratings of severity, duration and extent of the environmental impact. Likelihood considers the frequency of the activity together with the probability of an environmental impact occurring. The following assessment methodology will be used to examine each impact identified, see table.

Table 5: Criteria for impact evaluation (DEAT, 2006)

				Rating	of Se	verity					- //-
Impact Type		Extent		Duration		Intensity		Probability		Significance	
		Immediate	1		111(8)	Trends.		Low	LP		
Positive	POS	Local	L	Short-Term	ST	Low	L	Probable	P	Low	L
No Impact	NO	Regional	R	Medium-Term	MT	Medium	M	High	HP	Medium	N
Negative	NEG	National	N	Long-Term	LT	High	Н	Definite	D	High	Н

8.3 Impacts Associated with Construction Phase

Potential effects on the environment and their mitigation measures during construction are:

Dust Pollution – These are expected to be site specific, short-termed and will most probably pose a negligible nuisance and heath threat to those residing nearby. The construction of the proposed facility will have impact on the surrounding air quality. Dust suppression during the construction process is advised if dust becomes an issue.

Table 6: Impact associated with dust pollution

Identified	Impact Type	Extent	Duration	Intensity	Probability	Signifi	cance
Impact	5/5					Unmitigated	Mitigated
Dust	NEG	1	ST	L	P	L	L

Noise Impact – Earthmoving equipment will be utilised during the construction phase and noise may thus be generated. Construction workers should be equipped with ear protection equipment. Residential properties nearby (<150m) the site may be impacted. Construction should be limited to working hours only (07H00- 19H00).

Table 7: Impact associated with noise pollution

Identified Impact Impact Type	200 (809) NOW (200)	Extent	Duration	Intensity	Probability		
		1 1			Unmitigated	Mitigated	
Noise	NEG	I	ST	L	P	L	L

Safety and Security – Should a construction camp be necessary, it should be located in such a way that it does not pose a risk to the public. Equipment housed on site must be placed in a way that does not encourage criminal activities. For safety and security reasons it is recommended that the entire site (construction site and camp) be fenced-off and security personnel be employed to safeguard the premises and to avert criminal activates. Relevant safety signs should be clearly displayed.

For safety reasons children should also be kept from making the site a playground and their access should be prevented.

Table 8: Impact associated with safety and security

Identified Type Ex		Extent	Duration	Intensity	Probability	Signifi	cance
					Unmitigated	Mitigated	
Safety and Security	NEG	1	ST	L	P	М	L

Generation of Waste – In the form of human waste, litter, building rubble and other material to be disposed off. Waste must be disposed of at an appropriately classified waste disposal site. Waste handling procedures must be cleared with the town council and the construction contractor should be informed about this.

Table 9: Impact associated with waste generation

Identified	RESPONDED IN TAXABLE OF THE PROPERTY OF THE PR	Extent	Duration	Intensity	Probability	Significance	
Impact		Unmitigated	Mitigated				
Generation of waste	NEG	1	ST	L	Р	М	L

Groundwater Contamination – Leakages from equipment and machinery might occur during the construction phase. Chemicals used during construction e.g. paint and paint remover is also posing a risk. Care must be taken to avoid contamination of soil and groundwater.

Proper toilet facilities should be installed at the construction site and at the camping site or alternative arrangements made. The contractor shall ensure that there is no spillage when the toilets are cleaned or during normal operation and that the contents are properly removed from site. Fuel (diesel and petrol) and oil containers shall be in good condition and placed in a bunded area or on plastic sheeting covered with sand (temporary bunding).

Table 10: Impact associated with groundwater contamination

Identified Impact	Impact Type	Extent	Duration	Intensity	Probability	Signifi	cance
identified impact	Турс				Unmitigated	Mitigated	
Groundwater Contamination	NEG	T	ST	L	P	L	L

Health and Safety – During construction, earthmoving equipment will be used on site. This increases the possibility of injuries and the responsible contractor must ensure that all staff members are briefed about the potential risks of injuries on site. The contractor is further advised to ensure that adequate emergency facilities are available on site. All Health and Safety standards specified in the Labour Act should be complied with. Health and Safety Regulations pertaining to personal protective clothing, first aid kits being available on site, warning signs, etc. is very important and should be adhered to. Specific areas of concern are:

- Manual handling of equipment, heavy loads and repetitive work.
- Working at heights (falling/drowning)
- High noise can lead to hearing deficiencies
- Exposure to chemicals (paints etc.)
- Adequate measures must be brought in place to ensure safety of staff on site, and includes:

- Proper training of operators;
- First aid treatment:
- Medical assistance:
- Emergency treatment;
- Protective clothing;
- Ventilation and protective equipment;
- Install mechanical lifting aids rotate work tasks reduce repetitive activities:
- Reduce noise exposure isolate noisy equipment, rotate tasks, make use of protective equipment;
- Working at height permit to work system

Table 11: Impact associated with health and safety occupational

Identified Impact	Impact Type	Extent	Duration	Intensity	Probability	Signifi	cance
dentined impact						Unmitigated	Mitigated
Health and Safety - Occupational	NEG	I Ves	ST	L,	D	M been	L

Increased Informal Settlement and Associated Problems – Lack of proper housing may encourage informal settlements. Unskilled migrant workers are expected to choose cheaper housing options and thus opt for informal housing options. This can be mitigated by giving employment preference to locals that can proof normal residence in the area.

Table 12: Impact associated with increased informal settlement and associated problems

Identified Impact	Impact Type	Extent	Duration	Intensity	Probability	Signifi	cance
	3.5					Unmitigated	Mitigated
Increased informal settlement and associated problems	NEG	L	ST	L	Р	М	L

Increased Spread of HIV/ AIDS – The spending power of locals and expatriates working for the developer and/or its contractors are likely to increase, and this might be a perfect opportunity for sex workers to explore. Migrant labourers from other regions and expatriates are normally vulnerable and may use the services rendered by the sex workers. A key initiative should be to educate workers.

Table 13: Impact associated with spreading of diseases such as HIV/AIDS

Identified Impact	Impact Type Extent	Extent	Duration	Intensity	Probability	Signifi	cance
			į.			Unmitigated	Mitigated
Increased spread of HIV/ AIDS	NEG	N	ST	М	P	М	L

Increased Influx to Gobabis – More job opportunities may attract more non-local job seekers. This may lead to an increase housing demand with potential stimulation of property values and economic activities through increased spending in area. This impact

can be seen as both positive and negative. It is still advised to give employment preference to locals that can proof normal residence in the area.

Identified Impact	Impact Type	Extent	Duration	Intensity	Probability	Signifi	cance
	2.00					Unmitigated	Mitigated
Increased influx to Gobabis	POS/NEG	N	ST	L	P	М	L

Heritage Impacts – There are no known heritage areas or artefacts deemed to be impacted by the construction.

During construction, the contractor might come across archaeological features or objects that possess cultural values. If archaeological remains or objects with cultural values (e.g. Pottery, bones, shells, ancient clothing or weapons, ancient cutlery, graves etc) are uncovered at the exploration camp or surrounding, it should be barricaded off and the relevant authorities should be contacted immediately.

Table 15: Impact associated with heritage aspects

Identified Impact	Impact Type	Extent	Duration	Intensity	Probability	Significance	
	(E- W , 5 (4))					Unmitigated	Mitigated
Heritage Aspects	NEG	I	ST	L	LP	L	L

Stimulation of Skills Transfer – As the construction and operation of the development requires specialised work and skills it can be expected that experts will be training locals in certain skills during development and operation.

Table 16: Impact associated with stimulation of skills transfer

Identified Impact	Impact Type	Extent	Duration	Intensity	Probability	Signifi	cance
	0.50.5000				The Committee of Committee of the Commit	Unmitigated	Mitigated
Stimulation of skills transfer	POS	N	ST	М	P	L	L

Employment Creation – Various employment opportunities will be created during all phases of the development, ranging from highly skilled to unskilled. The creation of unskilled posts is of special interests as this is a major demand locally. Preference should be given to local residence and to Namibian Citizens. During the construction phase it is estimated that at least +-100 people will be recruited.

Table 17: Impact associated with employment creation

Identified Impact	Impact Type	Extent	Duration	Intensity	Probability	Signifi	cance
	3.5					Unmitigated	Mitigated
Employment creation	POS	L	ST	М	D	М	М

As discussed in the different sections, impacts are expected to be low to medium, short lived and site specific. An Environmental Management Plan (EMP) will ensure that the impacts of the construction work is minimised and includes measures to reduce the identified impacts during construction of the facility while ensuring that vehicles and pedestrian traffic are suitably protected to avoid accidents and injuries.

It is further advised that traffic signs and barricades be installed along the excavations to ensure public safety. Landscaping and re-vegetation of cleared areas will reduce visual impacts, growing palm trees around the PV solar power plant at a distance of 50 m away from the power plant will help reduce visual impacts.

The appointed contractor should be made aware of the content and environmental requirements of this report so as to plan the construction phase accordingly.

8.4 Impacts Associated with Operational Phase

Visual Impacts – The operation of the photovoltaic renewable power plant can cause some serious visual impacts as the community is not used to seeing steel frames with solar panels. Refer to chapter 6 for detailed description.

Health Impacts – The operations of the renewable photovoltaic solar power plant can cause serious health and safety risks to workers on site. Occupational exposures are normally related to dermal contact with fuels and inhalation of fuel vapours during handling of such products. For this reason adequate measures must be brought in place to ensure safety of staff on site, and includes:

- Proper training of operators;
- First aid treatment;
- Medical assistance:
- Emergency treatment;
- Protective clothing, footwear, gloves and belts; safety goggles and shields;
- Manuals and training regarding the correct handling of materials and packages should be in place and updated as new or updated material safety data sheets becomes available; and
- Monitoring should be carried out on a regular basis, including accident reports.

Table 18: Impact associated with health aspects

Identified Impact	Impact	Extent	Duration	Intensity	Probabilit	Significance	
,	Type				у	Unmitigated	Mitigated
Health Impacts	NEG	1	LT	L	LP	Н	L

Economic Impacts – Creation of new employment opportunities. This is deemed to be a positive impact. It is not clear how many new, permanent employment positions will be created but it is expected to be about 20-30 people.

Table 19: Impact associated with economic aspects

Identified Impact	Impact	Extent	Duration	Intensity	Probabilit	Signific	cance
	Type			8	у	Unmitigated	Mitigated
Economic Impacts	POS	R	LT	L	P	М	М

Stimulation of Economic Development – The development of the new renewable photovoltaic solar power plant in Gobabis is expected to enhance the economic development at the settlement. The construction of the solar power plant is expected to boost development confidence of the area.

Heritage Impacts – There are no known heritage areas or artefacts deemed to be impacted by the operational phase.

Table 20: Impact of heritage significance

Identified Impact	Impact	Extent	Duration	Intensity	Probabilit	Signific	cance
	Type			8	у	Unmitigated	Mitigated
Heritage Impacts	NEG	I	ST	L	LP	L	L

Ecological Impacts – No known conservation worthy vegetation are present on the proposed facility. Limited impact on the flora can be expected, as very little vegetation exists at the site.

Table 21: Impact of ecological significance

Identified Impact	Impact	Extent	Duration	Intensity	Probabilit	Signific	ance
	Type	-,		100	y	Unmitigated	Mitigated
Ecological Impacts	NEG	I	ST	L	LP	L	L

8.5 Impacts Associated with Decommissioning Phase

The decommissioning phase of the renewable photovoltaic power plant is difficult to visualise at this point in time. However impacts associated with this phase will be similar

to that of the construction phase, besides possible pollution emanating from the presence of toxic substances such as cadmium and arsenic in the solar panels.

During the decommissioning phase the solar panels to be removed should be handled properly and/ recycled. Guidelines for the solar panel removal must be followed to reduce the risk of toxic substances spillage and groundwater contamination. Rubble and waste will be created, as structures are dismantled. These should be contained and disposed of at an approved waste facility and not dumped in the surrounding areas. These should be done in recognition with the Gobabis Town Council's waste management regulations and guidelines.

9. REFERENCES

- Atlas of Namibia Project, (2002). Directorate of Environmental Affairs, Ministry of Environmental Affairs, Ministry of Environment and Tourism, Namibia
- Barnard, P. 1998. Underprotected habitats. In: Barnard, P. (ed.). Biological diversity in Namibia: a country study. Windhoek: Namibian National Biodiversity Task Force.
- ❖ Bester, B. 1996. Bush encroachment A thorny problem. Namibia Environment 1: 175-177.
- Buying a Photovoltaic Solar Electric System: A Consumer Guide (2003) California Energy Commission
- Cunningham, P.L.1998. Potential Wood Biomass Suitable for Charcoal Production in Namibia. Agri-Info 4(5): 4-8.
- Curtis, B. & Barnard, P. 1998. Sites and species of ecological, economic or archaeological importance. In: Barnard, P. (ed.). Biological diversity in Namibia: a country study. Windhoek: Namibian National Biodiversity Task Force.
- Christelis, G. and Struckmeier, W. (2001). Groundwater in Namibia. An explanation of the Hydrogeological Map. John Meinert Printing.
- Darmstadter J. (2004). Energy and Population, Washington DC.
- Directorate of Environmental affairs, (2002). Atlas of Namibia Project, Ministry of Environment and Tourism.
- GRN. 1996a. Nature Conservation Amendment Act, 1996. Government Gazette No. 1333. Government of the Republic of Namibia. Windhoek.
- GRN. 1996b. Amendment of Regulations Relating to Nature Conservation, 1996. Government Gazette No. 1446. Government of the Republic of Namibia. Windhoek.
- Gammal, M.I, Ibrahim, M.S, Badr, E.A., Asker S., A., and El-Galad, N.M. (2011). Health Risk assessment of Dust at workshops. Nature and Science, 2011; 9 (11). http://www.sciencepubinet/nature.
- Maggs, G. 1998. Plant diversity in Namibia. In: Barnard, P. (ed.). Biological diversity in Namibia: a country study. Windhoek: Namibian National Biodiversity Task Force.
- Mendelsohn, J., Jarvis, A., Roberts, C., Robertson, T. (2002). Atlas of Namibia: A portrait of the land and its people. Windhoek, Namibia: Ministry of Environment and Tourism.
- Ministry of Mines and energy, geological survey (2002).

- Miller R. McG. (2008). The geology of Namibia.
- Ministry of Environment and Tourism. Republic of Namibia. (2008). Guide to the Environmental Management Act No. 7 of 2007.
- Ministry of Environment and Tourism. Republic of Namibia. (2012). Environmental Impact Assessment Regulation: Environmental Management Act, 2007. Government Gazette No.4878.
- Namibia Statistics Agency, (2001). Namibia Population and Housing Census for Caprivi Regional Profile
- Van der Merwe, J.H. 1983. National Atlas of South West Africa (Namibia). National Book Printers, Cape Town, South Africa.
- Van der Merwe, J.H. 1983. National atlas of South West Africa (Namibia).
 National Book Printers, Cape Town, South Africa, 92pp.

OKA INVESTMENT (PTY) LTD AND BENZEL AND PARTNERS INVESTMENTS (PTY) LTD

ENVIRONMENTAL MANAGEMENT PLAN

PROPOSED NEW RENEWABLE PHOTOVOLTAIC SOLAR POWER PLANT

PREPARED BY: CENTRE FOR GEOSCIENCES RESEARCH CC

P O BOX: 31423 Pioneerspark, Windhoek, Namibia. 128 A Bach Street. email: cegeornam@gmail.com Tel: 061-307157 cell: 0811491004 Fax: 061-307156



TABLE OF CONTENTS

ABE	BREVIA	TIONS AND ACRONYMS	3
1 IN	TRODU	ICTION AND BACKGROUND	4
1.1	PRO	DJECT DESCRIPTION	4
1.2	SUN	MMARY OF THE PROPOSED ACTIVITIES	5
1.3	ADN	MINISTRATIVE, LEGAL AND POLICY REQUIREMENTS	5
1.4	THE	Namibian Constitution	0
1.5	ENV	IRONMENTAL MANAGEMENT ACT OF NAMIBIA (2007)	6
1.6	NAT	IONAL HERITAGE ACT No. 27 OF 2004	6
1.7	ENV	IRONMENTAL ASSESSMENT POLICY OF NAMIBIA	6
	1.7.1	Cradle to Grave Responsibility	7
	1.7.2	Precautionary Principle	7
	1.7.3	The Polluter Pays Principle	7
	1.7.4	Public Participation and Access to Information	7
	1.8	Electricity Act No. 4 of 2007	7
2 R	OLES A	ND RESPONSIBILITIES	9
2.1	COMPET	ENT AUTHORITY	9
2.2	THE	APPLICANT (OKA INVESTMENT (PTY) LTD)	9
2.3	OKA	INVESTMENT (PTY) LTD (PROJECT MANAGER)	9
2.4	OKA	INVESTMENT (PTY) LTD (ENVIRONMENTAL CONTROL OFFICER)	. 10
2.5	CON	TRACTOR'S SAFETY OFFICER	. 11
2.6	CON	TRACTORS	. 11
3	ENVIR	ONMENTAL MANAGEMENT PLAN	. 13
3.1	PRO	TECTION OF FLORA, FAUNA AND NATURAL FEATURES	. 13
3.2	Acc	ESS ROUTES AND WORK SITES	. 14
3.3	SITE	MANAGEMENT	. 14
3.4	STAI	FF MANAGEMENT	. 14
3.5	WAS	STE MANAGEMENT	. 14
4	MANA	GEMENT OF ENVIRONMENTAL ASPECTS	. 15
4.1	CON	STRUCTION / DECOMMISSIONING PHASE	. 15
	4.1.1	Dust	. 15
	4.1.2	Noise	. 15
	4.1.3	Safety and Security	. 15
	4.1.4	Nuisance Pollution	. 16
	4.1.5	Groundwater Contamination	. 16
	4.1.6	Generation of Waste	. 16
	4.1.7	Economic impacts	17
4.2	OPE	RATIONAL PHASE	17
	4.2.1	Visual Impacts	17
	4.2.6	Health and Safety	. 18
		Ecological Impacts	18
	4.2.12	Economic Impacts	18
5 CC	NCLU	SIONS	19

ABBREVIATIONS AND ACRONYMS

EIA	Environmental Impact Assessment	
EMP	Environmental Management Plan	
PV	Photovoltaic	
MET	Ministry of Environment and Tourism	
NamPower	Namibian Power Corporation	
DWA	Department of Water Affairs	
ECO	Environmental Control Officer	
DEA	Department of Environmental Affairs	
ENC	Environmental Coordinator	
EO	Environmental Officer	
EIA-C	Environmental Impact Assessment Consultant	
I&Aps	Interested and Affected Parties	
EAs Environmental Assessments		

1 INTRODUCTION AND BACKGROUND

This Environmental Management Plan (EMP) provides guidance for managing the construction, operation and decommissioning of a renewable photovoltaic solar power plant in Gobabis. The EMP is a working document which consists of a set of mitigation measures that will be implemented to eliminate, offset or reduce adverse environmental impacts to acceptable levels during the various phases (i.e. construction, operations and decommissioning).

The construction, operation and decommissioning involve:

- The construction of the new renewable photovoltaic solar power plant.
- Construction of an office for administrative work.
- Installation of the solar power plant's electricity grids.
- Connection of the plant's grid to the main electricity grid.
- Removal of the solar panels, steel rods and dispensing equipment.
- Removal of associated buildings and other infrastructure.

This environmental management plan (EMP) aims to take a pro-active route by addressing potential problems before they occur. This should limit the corrective measures needed, although additional mitigating measures might be included if necessary.

All Contractors and sub-Contractors taking part in any of the phases should be made aware of the contents of the EMP and of the Environmental Impact Assessment (EIA), so as to plan their activities accordingly in an environmental sound manner.

1.1 PROJECT DESCRIPTION

Oka Investment (Pty) Ltd and Benzel and Partners Investments (Pty) Ltd is proposing to construct a renewable photovoltaic solar power plant within the municipal boundaries of Gobabis. The proposed solar power plant will supply electricity to Nampower which will then be distributed nationwide. The rationale for the development project is based upon the increase in the demand for

electricity in the country due to the rapid industrial expansion. The boom in business activities in the country has lead to a demand in electrical services which have grown at a faster rate than expected. The project will be situated within Gobabis because of town's high sun hours, which is in the eastern part of the country, Omaheke region.

1.2 SUMMARY OF THE PROPOSED ACTIVITIES

The environmental issues related to construction of a renewable photovoltaic solar power plant are mostly local and are common in most construction operations. These issues include visual impacts, impact on biodiversity, land and soil disturbance and also social impacts.

During the process of site clearance for the construction phase there will be some land and soil disturbance which results in localised loss of flora as well as any other fauna that may be depended on such specific flora.

1.3 ADMINISTRATIVE, LEGAL AND POLICY REQUIREMENTS

The Environmental Management Plan (EMP) is the tool that can provide the assurance that the proponent has made suitable provisions for mitigation. The EMP describes the methods and procedures for mitigation and monitoring the impacts identified in the EIA report. The aim of the EMP is to:

- Ensure that the project complies with the goals of the Namibian Environmental Management Act 2007, (No. 7 of 2007), and;
- Provide a framework for implementing the management actions recommended in the EIA for construction, operational and decommissioning phases of the activities associated with the development of the proposed fuel retail facility.

The following legislation governs the EIA/EMP process in Namibia, pertaining to the proposed development.

1.4 The Namibian Constitution

Article 95 of Namibia's constitution provides that:

"The State shall actively promote and maintain the welfare of the people by adopting, inter alia, policies aimed at the following:

(I) management 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; in particular the Government shall provide measures against the dumping or recycling of foreign nuclear and toxic waste on Namibian territory."

This article recommends that a relatively high level of environmental protection is called for in respect of pollution control and waste management.

1.5 Environmental Management Act of Namibia (2007)

The Act provides a broad definition to the term "environment" - land, water and air; all organic and inorganic matter and living organisms as well as biological diversity; the interacting natural systems that include components referred to in sub-paragraphs, the human environment insofar as it represents archaeological, aesthetic, cultural, historic, economic, paleontological or social values. NOTE: this definition of "environment" was used throughout this report.

This Act provides a list of projects requiring an EIA. The proposed development is also listed as a project requiring an EIA under this Bill.

1.6 National Heritage Act No. 27 of 2004

The Heritage Act of 2004 makes provision for the developer to identify and assess any archaeological and historical sites of significance. The existence of any such sites should be reported to the Monuments Council as soon as possible. The Council may serve notice that prohibits any activities as prescribed within a specified distance of an identified heritage/archaeology site.

1.7 Environmental Assessment Policy of Namibia

The Environmental Assessment Policy of Namibia requires that all projects, policies, programmes, and plans that have detrimental effect on the environment must be accompanied by an EIA. It further provides a guideline list of all activities requiring an impact assessment. The proposed development is listed as a project requiring an impact assessment as per the following points in the policy:

- Transportation of hazardous substances & radioactive waste.
- Storage facilities for chemical products.

Industrial installation for bulk storage of fuels.

The policy provides a definition to the term "environment" - broadly interpreted to include biophysical, social, economic, cultural, historical and political components and provides reference to the inclusion of alternatives in all projects, policies, programmes and plans. Cumulative impacts associated with proposed developments must be included as well as public consultation. The policy further requires all major industries and mines to prepare waste management plans and present these to the local authorities for approval.

Apart from the requirements of the Draft Environmental Assessment Policy, the following sustainability principles needs to be taken into consideration, particularly to achieve proper waste management and pollution control.

1.7.1 Cradle to Grave Responsibility

This principle provides that those who manufacture potentially harmful products should be liable for their safe production, use and disposal and that those who initiate potentially polluting activities should be liable for their commissioning, operation and decommissioning.

1.7.2 Precautionary Principle

There are numerous versions of the precautionary principle. At its simplest it provides that if there is any doubt about the effects of a potentially polluting activity, a cautious approach should be adopted.

1.7.3 The Polluter Pays Principle

A person who generates waste or causes pollution should, in theory, pay the full costs of its treatment or of the harm, which it causes to the environment.

1.7.4 Public Participation and Access to Information

In the context of environmental management, citizens should have access to information and the right to participate in decisions making.

1.8 Electricity Act No. 4 of 2007

The Act stipulates the establishment of the Electricity Board and for its powers and functions. It further provides for the requirements and conditions for obtaining licences for the provision of electricity, and for the powers and obligations of licensees and to provide for incidental matters.

The objective of the Act is laid down in its Section 3 which is to exercise control over and regulate the provision, use and consumption of electricity in Namibia through the Electricity Control Board (ECB) as well as to oversee the efficient functioning and development of the electricity industry and security of electricity provision. The Act under its Section 21 states that the applicant has to submit an Environmental Impact Assessment study indicating the extent of any potential damage to or pollution of the environment and the steps proposed to prevent such damage or pollution and to restore the environment generally and in terms of existing environmental legislation. It is for this reason that Oka Investment (Pty) Ltd and Benzel and Partners Investments (Pty) Ltd has appointed Centre for Geosciences Research cc to undertake the EIA study for the proposed renewable solar power plant in Gobabis.

This section describes the roles and responsibilities of the key stakeholders involved in the development, implementation and review of the EMP. The contractor in this report refers to Oka Investment (Pty) Ltd and Benzel and Partners Investments (Pty) Ltd and its appointed contractors.

2.1 Competent Authority

The Department of Environmental Affairs: Ministry of Environment and Tourism is responsible for the review of the EMP documents.

2.2 The applicant (Oka Investment (Pty) Ltd and Benzel and Partners Investments (Pty) Ltd)

The role of the applicant is as follows:

- Review report, implement the EMP and make payments to the Contractor if the EMP is being implemented in a satisfactory manner.
- Give warnings and imposes fines and penalties to the Contractor if the Contractor neglect to implement the EMP satisfactorily.

2.3 Oka investment (Pty) Ltd and Benzel and Partners Investments (Pty) Ltd (Project Manager)

The Applicant will appoint the Project Engineer. The role of the project manager will be:

- Liaising directly with the relevant authorities with respect to the preparation and implementation of the EMP and meeting the conditions documented in the environmental clearance certificate.
- Bear the overall responsibility for managing the project contractors and for ensuring that the environmental management requirements are met.
- Inform the contractors of the EMP and Environmental clearance certificate obligations.

- Approve all decisions regarding environmental procedures and protocols that must be followed.
- Have the authority to stop any construction in contravention with the EMP and RoD.
- In consultation with the Environmental Control Officer (ECO) has the authority to issue fines for transgressions of basic conduct rules and/or contravention of the EMP.
- Maintain open and direct lines of communication between the proponent,
 Contractor and Interested and Affected Parties (I&APs) with regards to environmental matters.
- Attend regular site meetings and inspections where required.

2.4 Oka Investment (Pty) Ltd and Benzel and Partners Investments (Pty) Ltd (Environmental Control Officer)

An Environmental Control Officer (ECO) should be employed by the Contractor. This person should be available for the duration of the construction period and should have appropriate training and experience in the implementation of the EMP and overseeing construction process. This ECO will implement EMP at all levels and sections (sub-contractors) during the construction of the PV plant. During operation of the PV plant the City's Environmental Management Division will take over the role of ECO. The responsibilities of the ECO include the following:

- Assist the Project Manager and Contractor in finding environmentally responsible solutions to challenges that may arise.
- Conduct environmental monitoring as per EMP requirements.
- Monitor performance of the contractors and ensuring compliance with the EMP and associated method statements.
- Maintenance, update and review of the EMP.
- Liaison between the contractors, authorities and other key stakeholders on all environmental concerns.

- Validating regular site inspection reports which are prepared by the Contractor's Environmental Officer (EO).
- Checking the EO's record of environmental incidents as well as corrective and preventative actions taken.
- Checking the EO's public complaints register in which all complaints are registered and actions taken thereof.
- Issuing site instructions to the contractors ECO for corrective actions required.
- Assisting with the resolution of conflict.
- Communicating all amendments of the EMP to the relevant stakeholders.
- Conducting monthly audits to ensure that the system for implementing the EMP is effective.

2.5 Contractor's Safety Officer

- Implement the recommendations in the EIA and satisfy the conditions in the RoD.
- Ensure that safety is practiced for all activities on site.
- Prepare and implement safety procedures
- Communicate all safety related issues.

2.6 Contractors

The contractor should appoint the Contactor's representative who is suitably qualified to implement the EMP. The responsibilities of the Contractor include:

- Compliance with the relevant legislation and the EMP.
- Preparation and submission to the proponent through Project Manager the following Management Plans prior to commencing work:
- Environmental Awareness Training and Inductions;
- Emergency Preparedness and Response;
- Waste Management; and
- Health and Safety.

- Environmental awareness presentations (inductions) to be given to all site personnel prior to work commencement; the ECO is to provide the course content and the following topics, at least but not limited to, should be covered:
- The importance of complying with the relevant Namibian, International and Best Practice Legislation.
- Roles and Responsibilities, including emergency preparedness.
- Basic Rules of Conduct (Do's and Don'ts).
- EMP: aspects, impacts and mitigation;
- Fines for Failure to Adhere to the EMP;
- Health and Safety Requirements.
- Record keeping of all environmental awareness training and induction presentations; and
- Attend regular site meetings and environmental inspections.

3 ENVIRONMENTAL MANAGEMENT PLAN

In this EMP, distinction is made between the construction, operational and the decommissioning phases. The contractor in this report refers to Oka Investments (Pty) Ltd and Benzel and Partners Investments (Pty) Ltd and its appointed contractors.

Before commencement of any construction work, the Contractor shall brief his or her staff on the content of the EMP and the EIA. The Contractor has the responsibility for implementing the EMP and ensuring their staff complies with the guidelines. Daily audits must be carried out; and corrective action implemented when needed. Oka Investment (Pty) Ltd and Benzel and Partners Investments (Pty) Ltd should promote the implementation of this EMP.

3.1 Protection of flora, fauna and natural features

The Contractor is responsible for ensuring that the impacts on the environment around the renewable PV solar power plant are minimised. The Contractor shall not deface, paint, damage or mark any natural features (e.g. endangered plant species) situated in or around the new renewable PV solar power plant. Land disturbance should be minimised.

No flora shall be removed, damaged or disturbed outside the designated working areas. Removal, damage or disturbance to flora in the designated working areas is to be minimised. Sensitive, protected and endangered plant species is to be avoided during the removal of vegetation.

In order to protect the environment and achieve sustainable development of the environment, it is necessary to incorporate sound environmental management objectives and targets for the designated renewable PV solar power plant.

According to the Namibian legislation, all projects, plans, programmes and policies deemed to have adverse impacts on the environment require an EIA. The following legislations govern the process of EIA in the country pertaining to the proposed development:

3.2 Access routes and work sites

Equipments to the site will be transported on the B6 road from Windhoek to Gobabis or the Trans-Kalahari Highway which serve as an important link to South Africa. No new tracks shall be established and only existing roads may be used.

3.3 Site Management

Areas outside this designated working zone shall be considered "no go" areas. The renewable PV solar power plant must be demarcated when offloading equipments to enhance safety around the proposed development.

3.4 Staff management

The Contractor must ensure that their employees have suitable personal protective equipment, are properly trained and that a fire fighting and a first aid officer is onsite.

3.5 Waste management

No on-site burning, burial or dumping of any waste materials, vegetation, litter or refuse shall occur at the renewable PV solar power plant.

The developer shall remove all waste off-site to designated licensed disposal sites. The Contractor must provide sufficient bins or containers on-site to store any solid or liquid waste produced. The bins and containers should be weatherproof and scavenger-proof.

4 MANAGEMENT OF ENVIRONMENTAL ASPECTS

4.1 Construction / Decommissioning Phase

This section details mitigation measures proposed for the implementation during the construction phase.

4.1.1 Dust

Identified Impact	Description	Mitigation	Monitoring	Responsible body
Dust	Dust may be generated during the construction/decommission phase and might be aggravated when strong winds occur. These are expected to be site specific and will potentially pose a nuisance to the neighbouring properties. The construction of the proposed facility should have minimal impact on the surrounding air quality.	It is recommended that regular dust suppression be included in the construction phase, when dust becomes an issue.	Regular visual inspection	Oka Investment (Pty) Ltd and Benzel and Partners Investments (Pty) Ltd

4.1.2 Noise

Identified Impact	Description	Mitigation	Monitoring	Responsible body
Noise	Noise pollution due to construction equipment and machinery on site	Ensure engines are fitted with muffiers. Equipment and machinery operators should be equipped with ear protection equipment	Strict operational times. Regular inspection.	Oka Investment (Pty) Ltd and Benzel and Partners Investments (Pty) Ltd

4.1.3 Safety and Security

Identified Impact	Description	Mitigation	Monitoring	Responsible Body
Safety and Security	During the construction and decommissioning phase,	The responsible contractor must ensure that all staff	Security	Oka Investment (Pty) Ltd and
	earthmoving equipment will	members are briefed	monitoring.	Benzel and
	be used on site. This	about the potential risks of	Safety	Partners

increases the possibility of	injuries onsite. The	Procedures.	Investments
injuries. Presence of	contractor is further	First aid	(Pty) Ltd
equipments may encourage	advised to ensure that	Training	100
criminal activities	adequate emergency		
	facilities including first aid		
	kit are available on site.		
	injuries. Presence of equipments may encourage	injuries. Presence of contractor is further equipments may encourage criminal activities adequate emergency facilities including first aid	injuries. Presence of contractor is further equipments may encourage advised to ensure that criminal activities adequate emergency facilities including first aid

4.1.4 Nuisance Pollution

Identified Impact	Description	Mitigation	Monitoring	Responsible Body
Nuissance pollution	Aesthetics and inconvenience caused to persons trying to access/exit immediate neighbouring buildings and/or destinations.	Take cognition when parking vehicles and placing equipments and infrastructure.	Regular visual inspection	Oka Investments (Pty) Ltd and Benzel and Partners Investments (Pty) Ltd

4.1.5 Groundwater Contamination

Identified Impact	Description	Mitigation	Monitoring	Responsible Body
Groundwater contamination	Groundwater contamination can occur during the decommissioning phase from the toxic substances that are contained in the solar panels such as cadmium and arsenic. This are extremely harmful substances and can be extremely dangerous if they get into the ground water .Minimal groundwater contamination can be caused by leakages of fuel from machinery and heavy-duty vehicles during construction and decommissioning phase.	Recycle the solar panels during the decommissioning phase. Dispose the panels properly during the decommissioning phase. Prevent spillages of any chemical.	Regular visual inspection	Oka Investment (Pty) Ltd and Benzel and Partners Investments (Pty) Ltd

4.1.6 Generation of Waste

Identified Impact	Description	Mitigation	Monitoring	Responsible body
Generation of	This can be in a form of	Ensure that no excavated	Housekeeping	Oka Investment

waste	contaminated soil and building rubble, wires, and human waste	soil, refuse or building rubble generated on site are placed or dumped on surrounding properties or land. This includes road reserves e.t.c. Provide adequate waste bins in litter prone areas on the site and dispose the solid waste in the Gobabis dumping site. Clear dumping area with Gobabis Municipality or the Local Authority in the area	procedure monitoring, Observation of site appearance by the facility manager.	(Pty) Ltd and Benzel and Partners Investments (Pty) Ltd
-------	---	---	---	---

4.1.7 Economic impacts

Identified Impact	Description	Mitigation	Monitoring	Responsible Body
Economic Impacts	The number of jobs that might be created. More than 100 people will be employed during construction phase.	Locals should be highly considered when hiring for temporary or permanent jobs.	Inspections should be done during the recruitment process	Oka investment (Pty) Ltd and Benzel and Partners Investments (Pty) Ltd

4.2 Operational Phase

This section details mitigation measures proposed for the implementation during the operational phase. Main responsible party in this section is

4.2.1 Visual Impacts

Identified Impact	Description	Mitigation	Monitoring	Responsible Body
Visual impacts	the change to the existing visual environment (i.e. views) caused by the intervention and the extent to which that change compromises (negative impact) or enhances (positive impact) or maintains the visual quality of the scene as perceived by people visiting, working or living in the area. The visual impact will thus be more negative than positive in this scenario but minimal as there are already existing solar panels in Gobabis.	Re-vegetate the area; grow palm trees around the renewable photovoltaic solar power plant at a distance of 50 m away from the power plant. This will reduce the visibility of the solar panels in the power plant.	Visual Inspection.	Oka Investment (Pty) Ltd and Benzel and Partners Investments (Pty) Ltd

4.2.6 Health and Safety

Identified Impact	Description	Mitigation	Monitoring	Responsible Body
Health and safety	Even though photovoltaic solar panels are safe and effective, there are potential health and safety hazards associated with the full cycle of photovoltaic's. Chemicals used to produce the panels can cause health hazards. Minimal hazards can also occur during events of fire, if any was to occur.	Adequate measures must be brought in place to ensure safety of staff on site, and includes 1) Proper training of operators 2) First aid treatment 3) Medical assistance 4) Emergency treatment 5) Protective clothing	Monitoring should be carried out on a regular basis, Including accident reports.	Oka Investment (Pty) Ltd and Benzel and Partners Investments (Pty) Ltd

4.2.11 Ecological Impacts

Identified Impact	Description	Mitigation	Monitoring	Responsible Body
Ecological Impacts	No conservation worthy vegetation and fauna exists at the site	Some vegetation should be planted at the site to minimize surface run-off. Some vegetation should be planted on site to reduce visual impacts.	Visual inspection	Oka Investment (Pty) Ltd and Benzel and Partners Investments (Pty) Ltd

4.2.12 Economic Impacts

Identified Impact	Description	Mitigation	Monitoring	Responsible Body
Economic Impacts	The number of jobs that might be created, the project is estimated to create jobs for 20-30 people during its operational phase	Locals should be highly considered when hiring for temporary or permanent jobs	Regular inspections	Oka Investment (Pty) Ltd and Benzel and Partners Investments (Pty) Ltd

5 CONCLUSION

The above Environmental Management Plan, if properly implemented, will help to minimise adverse impacts on the environment. Where impacts occur, immediate action must be taken to reduce the escalation of effects associated with these impacts. To ensure the relevance of this document to the specific stage of project, it needs to be reviewed throughout all phases.

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