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REPORT:

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN FOR THE CONSTRUCTION AND OPERATION OF THE HEJA LIFESTYLE ESTATE, KHOMAS REGION, NAMIBIA

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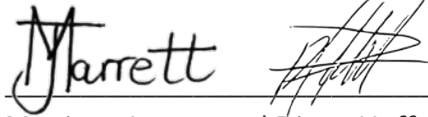
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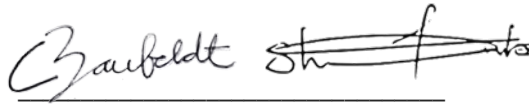
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ABBREVIATIONS

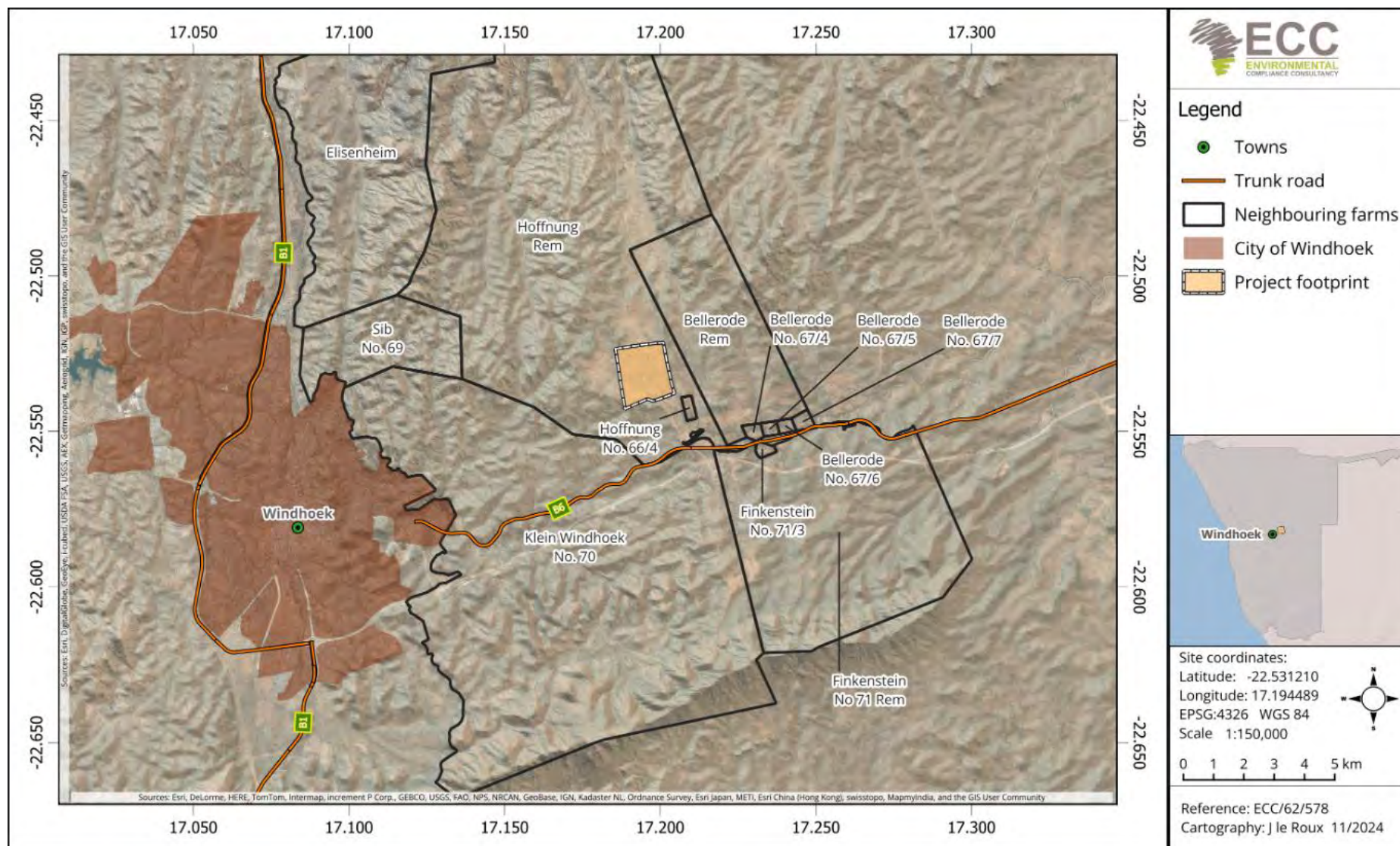
Abbreviation	Description
%	percentage
>	greater than
CoW	City of Windhoek
dB	decibel
DEAF	Department of Environmental Affairs and Forestry
DWA	Department of Water Affairs
E	East
EC	Environmental commissioner
ECC	Environmental Compliance Consultancy (Pty) Ltd
EMA	Environmental Management Act, No. 7 of 2007
ESIA	environmental and social impact assessment
ESMP	environmental and social management plan
GIS	geographic information system
GPS	geographic positioning system
ha	hectare
HR	human resources
I&APs	interested and affected parties
i.e.	that is
JV	joint venture
km	kilometre
km/h	kilometre per hour
Ltd.	limited
MSDS	material safety data sheet
MAFWLR	Ministry of Agriculture, Fisheries, Water and Land Reform
MEFT	Ministry of Environment, Forestry and Tourism
MIME	Ministry of Industries, Mines and Energy
MLIREC	Ministry of Labour, Industrial Relations and Employment Creation
MURD	Ministry of Urban and Rural Development
MWT	Ministry of Works and Transport
PPE	personal protective equipment
Pty	proprietary
SNR	single number rating
SPCA	Society for the Prevention of Cruelty to Animals
WWTWs	wastewater treatment works

1 INTRODUCTION

1.1 PROJECT BACKGROUND

Environmental Compliance Consultancy (Pty) Ltd (ECC) has been engaged by Heja Game Lodge (Pty) Ltd (Heja or 'the Proponent') to conduct a scoping with impact assessment for the proposed Heja Lifestyle and Country Estate (proposed Project) and submit an environmental clearance certificate application for the Project to the Ministry Urban and Rural Development (MURD) as the competent authority and the environmental commissioner (EC) at the Ministry of Environment, Forestry and Tourism (MEFT). The site is proposed to be redeveloped into a mixed-use lifestyle comprising approximately 1 200 residential erven. The development is planned to include single residential houses, townhouses, apartments and associated infrastructure, in a phased approach. This development seeks to address the growing demand for a range of residential types within the greater Windhoek area. The Project site is situated on a portion of Hoffnung Farm No. 66 in the Windhoek Rural Constituency, Khomas Region, Namibia (Figure 1).

The D1527 road will serve as the main access road to the development and will have to be upgraded to an acceptable standard for the development. This will include a material investigation to determine the extent of the required upgrade/rehabilitation of the road.



1.2 ENVIRONMENTAL REGULATORY REQUIREMENTS

The proposed Project triggers activities listed under the Environmental Management Act, No. 7 of 2007 (EMA) and its 2012 Regulations. Prior to commencement of construction activities, an environmental clearance certificate must be obtained from the Department of Environmental Affairs and Forestry (DEAF).

This environmental and social management plan (ESMP) has been prepared in terms of the requirements of the EMA and its 2012 Regulations.

1.3 PURPOSE OF THIS REPORT

This ESMP provides a logical framework, mitigation measures, management strategies and monitoring requirements for the proposed Project and its associated activities. This ensures that the potential environmental impacts are curbed and minimised as far as practically possible and that statutory and other legal obligations are adhered to and fulfilled. Outlined in the ESMP are the protocols, procedures and roles and responsibilities to ensure the management commitments are effectively and appropriately implemented.

This ESMP is a live document and shall be reviewed at predetermined intervals and/or updated when or if the scope of work alters, when information is added or when unforeseen environmental and social impacts have been identified. All staff members and appointed contractors and their subcontractors will be legally required to comply with the requirements set out in this ESMP, once approved by the Ministry of Environment, Forestry and Tourism (MEFT), Ministry of Urban and Rural Development (MURD) and the City of Windhoek (CoW).

1.4 MANAGEMENT OF THIS ESMP

The Proponent will hold the environmental clearance certificate for the Project and will be responsible for the implementation and management of this ESMP. The implementation and management of this ESMP, and thus the monitoring of compliance, will be undertaken through daily duties and activities, as well as monthly inspections. All Project personnel throughout all Project phases are expected to comply with the requirements stipulated in this ESMP.

1.5 LIMITATIONS, UNCERTAINTIES AND ASSUMPTIONS RELATED TO THIS ESMP

Where there is any conflict between the provisions of this ESMP and any contractor's obligations under their respective contracts, including statutory requirements (such as licences, Project approval conditions, permits, standards, guidelines and relevant laws), the contract should be amended, and statutory requirements are to take precedence.

The information presented in this ESMP is based on the proposed scope of work as provided by the Proponent. When the design or operation method changes, this ESMP will need to be updated, and additional assessment may be required.

2 ENVIRONMENTAL MANAGEMENT FRAMEWORK

2.1 OBJECTIVES AND TARGETS

The Project site is situated in an already disturbed environment, approximately 10 km east (E) of the Namibian capital city, Windhoek. To prevent and mitigate potential adverse environmental and social impacts, specific environmental objectives and targets have been developed. These are developed to ensure that all Project activities are conducted in a manner that minimises potential impacts on both the receiving environment and surrounding social receptors.

The overall environmental and social objectives for the Project are as follows:

- Manage waste and wastewater efficiently and reduce the potential for environmental pollution;
- Use natural resources effectively and efficiently;
- Prevent environmental degradation by limiting land use and development to designated areas of development (Project footprint);
- Zero air quality and / or noise complaints during construction and operational activities from local stakeholders; and
- Resolve complaints received from the surrounding community through effective grievance resolution mechanisms.

2.2 ORGANISATIONAL STRUCTURE, ROLES AND RESPONSIBILITIES

The Proponent shall be responsible for:

- Ensuring all staff members, appointed contractors, subcontractors and visitors are aware of the procedures set out in this ESMP;
- Ensuring that all personnel receive adequate supervision and instruction to effectively fulfil the requirements stipulated in this ESMP;
- Ensuring that any person allocated specific environmental responsibilities is formally notified of their appointment and confirms that their responsibilities are clearly understood;
- Monitoring and evaluating the implementation of the ESMP to ensure continuous improvement and compliance throughout all phases of the Project;
- Keeping records of environmental incidents, corrective actions and induction activities for audit and reporting purposes;
- Promoting a culture of environmental awareness and accountability among all staff, contractors and visitors through ongoing communication and engagement; and
- Ensuring that contractors and subcontractors and all personnel under their employment comply with the requirements of this ESMP.

Table 1 outlines the key roles and responsibilities assigned to Project team members tasked with executing Project activities in compliance with the ESMP requirements.

Table 1 - Project team roles and responsibilities

Role	Responsibilities and duties
Proponent	– Overall accountability for the Project and ensuring compliance with statutory and environmental obligations; – Provide resources and oversight for both construction and operational phases; – Appoint the Project manager, Site manager and other key staff to ensure effective implementation of the ESMP; and – Ensure funding and support for mitigation measures and audits.
Appointed Project manager	– Responsible for the overall management and implementation of the ESMP during the construction phase; – Develop a safety management plan to ensure staff are trained, equipped and aware of potential hazards and risks; – Ensure adequate resources are available for contractors to comply with the ESMP; – Supervise and coordinate all contractors and subcontractors; – Report any non-compliance or accidents to stakeholders and regulatory authorities (e.g. MEFT, Ministry of Agriculture, Fisheries, Water and Land Reform (MAFWLR), Ministry of Work and Transport (MWT), Ministry of Urban and Rural Development (MURD), Ministry of Industries, Mines and Energy (MIME) and National Heritage Council (NHC)); and – Facilitate environmental awareness training and inductions for construction staff.
Appointed Site manager	– Responsible for ensuring compliance with the ESMP during the operational phase; – Oversee execution of the development and operational activities; – Ensure staff and contractors are aware of ESMP commitments and statutory licence/permit conditions; – Conduct regular inspections and audits of infrastructure and operational activities; – Receive, record and respond to community complaints; – Report any non-compliance or accidents to stakeholders and regulatory authorities (e.g. MEFT, MAFWLR, MURD, MWT and NHC); – Provide environmental awareness/management training to operational staff; and – Allocate resources to maintain a safe and environmentally compliant operation.

Role	Responsibilities and duties
Employees, contractors, and subcontractors	– Comply with the ESMP throughout the Project lifecycle; – Demonstrate understanding of ESMP requirements; – Attend briefings, training and toolbox talks on environmental matters; – Report deviations from the ESMP; and – Implement corrective or remedial actions as directed by the Project manager or Site manager.
Body corporate / residents	– Responsible for environmental management within the residential areas; – Comply with community environmental rules and cooperate with the body corporate to monitor and enforce sustainable practices; and – Report any environmental concerns or non-compliance within residential areas to the Body corporate or Site manager.

2.3 CONTRACTORS AND SUBCONTRACTORS

Contractors and their subcontractors contracted by the Proponent must be compliant with this ESMP and shall be responsible for the following:

- Undertake activities in accordance with this ESMP, as well as relevant policies, procedures, management plans, method statements, licences and contract obligations;
- Implement effective environmental and safety management measures;
- Adopt environmental best practices to ensure the preservation of the receiving environment and minimise potential environmental impacts to the greatest extent possible;
- Report environmental issues, including actual or potential environmental incidents and aspects and impacts to the Project manager (during the construction phase) or Site manager (during the operational phase);
- Cooperate fully with environmental inspections, audits and monitoring activities conducted by the Project manager, Site manager or regulatory authorities;
- Ensure that employees under their employment are made aware of and comply with the requirements of this ESMP; and
- Ensure that appropriate corrective or remedial actions are implemented to address all environmental aspects and incidents. Lessons learnt should always be documented for future reference and continuous improvement.

2.4 WORKFORCE COMPETENCY

All personnel working on the Project shall be competent to perform tasks that have the potential to cause an environmental impact. In this instance, competence is defined in terms of appropriate education, specialised skill sets and work experience.

The Proponent, contractors and subcontractors shall comply with the Republic of Namibia's Regulations for Labour, Health and Safety and any subsequent amendments to these Regulations. The following conditions, amongst others, must be complied with:

- A competent workforce must be employed for the construction and operational phase, with demonstrated capability to perform effectively;
- All Project personnel shall be provided with the necessary and appropriate personal protective equipment (PPE);
- Should foreign workers be hired, the Proponent shall ensure that they have valid work permits at all times;
- Occupational health and safety protocols are to be enhanced throughout the Project lifecycle;
- Regular toolbox talks and refresher training courses shall be conducted to reinforce health and safety and environmental responsibilities; and
- All Project personnel shall undergo an induction course covering environmental awareness, occupational safety procedures and site-specific risks and impacts before commencing work.

2.5 EMPLOYMENT

The Proponent and all contractors shall comply with the provisions of the Republic of Namibia's Regulation for Labour, Health and Safety, including any amendments thereto, in relation to the recruitment of the Project workforce. The following shall be complied with:

- The Proponent and contractors, in collaboration with local government and community authorities and their recruitment mechanisms, shall ensure that local people have access to information regarding job opportunities and are prioritised for employment in construction, operations or maintenance roles;
- The number of job opportunities shall be made known, together with the associated skills and required qualifications;
- The maximum expected duration of the job, whether temporary or permanent, shall be indicated;
- Foreign workers with no proof of permanent legal residence and work permit shall not be hired; and
- All employees hired must be issued valid employment contracts specifying their position, hourly remuneration rate and assigned duties.

3 COMMUNICATION AND AWARENESS

To ensure potential environmental impacts are minimised, it is important that Project personnel are appropriately informed and briefed on how to properly implement the ESMP. It is also important that regular communication is maintained with stakeholders and regulatory authorities (i.e. surrounding farms and community residents). This section outlines the framework for communication related to the implementation of the commitments that are specified in this ESMP.

3.1 INTERNAL COMMUNICATION

During construction, the Project manager shall communicate site-wide environmental issues to the Project team through the following means (as and when required):

- Site induction;
- Site notices;
- WhatsApp group (or preferred social communication mobile application tool);
- Method statements and risk assessment briefings;
- Daily, weekly and monthly audits and site inspections;
- Toolbox talks, including instructions on incident response procedures; and
- Briefing on key Project-specific social and environmental issues.

This ESMP shall be distributed to the Project team, including contractors and subcontractors, to ensure that the environmental requirements are adequately communicated. The key activities and environmentally and socially sensitive operations must be highlighted clearly to workers and contractors.

Throughout the construction phase, communication among the construction team shall include discussion on any complaints received and actions to resolve them, results of inspections and audits conducted, any non-conformance with this ESMP, and updates on objectives or target achievements.

3.1.1 SITE INSPECTION AND TOOLBOX TALKS

All personnel involved in the Project shall be inducted to the site regarding any specific environmental, social, health and safety issues. The workforce must be briefed on the observations recorded during the site inspection and risk assessment findings during toolbox talks. The workforce must demonstrate an understanding of the principles outlined in this ESMP and the potential environmental and social impacts associated with their activities. All Project personnel must also demonstrate a clear understanding of the procedures required to control these impacts and the consequences of departure from these procedures; these are as follows:

- Demonstrate an understanding of the site's general and environmental rules;
- Understand the necessary steps to address any environmental issues and identify the appropriate contacts for resolving such problems;

- Understand the potential consequences of non-compliance with this ESMP and violation of relevant statutory licences and permits conditions (where applicable); and
- The roles of the responsible people working on the Project.

3.1.2 TRAINING AND ENVIRONMENTAL AWARENESS

All personnel working on the Project during both the construction and operational phases must be competent to perform tasks that have the potential to cause an environmental impact. Competence is defined in terms of appropriate education, training and work experience. When it has been determined that certain skills are lacking, training and refresher courses must be offered to the workforce. The Project manager (construction phase) and Site manager (operational phase) must ensure records of these training sessions are always filed appropriately and kept on-site (if possible).

3.2 EXTERNAL COMMUNICATION

The Project manager (construction phase) and Site manager (operational phase) shall represent the Project and shall liaise with external regulatory authorities (e.g. MEFT, MWT and MURD), civil society organisations, farmers associations and community representatives. This will ensure good working relations with the stakeholders and compliance with all relevant regulations, Project-approved licences and permits (where applicable).

3.2.1 ENVIRONMENTAL EMERGENCY AND RESPONSE

An emergency is any abnormal event which demands immediate attention. It is any unplanned event which results in the temporary loss of management control at the site but where functional resources can manage the response. An emergency response plan document will be put in place that manages the response in relation to emergencies, including environmental emergencies.

Table 2 provides a list of numbers to be contacted in case of an emergency.

Table 2 - Emergency contact details

Town	Ambulance and Fire Brigade	Klein Windhoek Police Station
Windhoek	+264 (61) 21-1111	+264 (61) 246 644

All wildlife crimes must be promptly investigated and reported to MEFT.

Should there be large-scale fuel spills (i.e. > 200 litres (L)), MIME must be notified by completing form PP/11 (telephone: +264 61 284 8111) (as discussed in Section 4.4).

3.2.2 COMPLAINT HANDLING AND RECORDING

Any complaints received verbally by any personnel on the Project site shall be recorded by the receiver, including:

- The name of the complainant;

- The contact details of the complainant;
- Date and time the complainant was received; and
- The nature of the complaint.

The information shall be provided to the Project manager who is overall responsible for managing complaints during the construction phase and to the Site manager during the operational phase. The Project and Site manager must address the complaints by following these measures:

- Record the complaint in the complaint register; and
- Provide a written response to the complainant of the results of the investigation and action to be taken to rectify or address the matter(s). Where no action is taken, the reasons why are to be recorded in the register.

The Project team and contractor employees shall be informed about the complaints register, its location and the person responsible, to refer residents, tourists or the public who wish to lodge a complaint. The complaints register shall be kept for the duration of the Project and must be available for government or public review, upon request.

3.2.3 COMMUNICATIONS DURING OPERATIONS

The purpose of this Communication Programme is to:

- Ensure effective implementation of the Estate's environmental and social management Plan (ESMP);
- Promote environmental awareness and compliance among residents, contractors, service providers and staff;
- Maintain transparent communication with stakeholders and regulatory authorities;
- Provide structured procedures for complaints, emergencies and reporting;
- Promote good neighbour relations with surrounding farms and communities (particularly relevant in peri-urban Windhoek estates).

This programme applies during both the operational phase of the estate and any future construction, maintenance or upgrade works.

3.2.3.1 *Internal communication*

The Body Corporate, through the Estate Manager, is responsible for communicating environmental, social and safety requirements to residents, staff and contractors. Communication mechanisms include:

- Resident induction packs and estate rulebooks;
- Email circulars, notice boards and approved digital platforms (e.g. WhatsApp);
- Contractor inductions and method statement briefings;
- Routine inspections and audits;
- Toolbox talks for maintenance personnel.

All contractors and staff must be inducted prior to commencing work and demonstrate understanding of estate environmental rules, emergency procedures and consequences of non-compliance. Training records must be maintained.

3.2.3.2 Training and Awareness

Estate personnel/staff must be competent to perform tasks that may cause environmental impacts. Where gaps are identified, appropriate training and refresher sessions must be conducted. Environmental awareness initiatives (e.g. waste management, fire prevention and water conservation) should be regularly communicated to residents.

3.2.3.3 Emergency Communication

An Emergency Response Plan shall be implemented to manage fire, medical incidents, spills, security risks and environmental emergencies. Emergency contact details must be displayed on site. Reportable incidents (e.g. significant fuel spills or wildlife crimes) must be communicated to the relevant authorities in accordance with Namibian regulations as stated in section 3.2.1.

3.2.3.4 Incident Reporting Procedure

In the event of an environmental incident:

- Immediate containment and safety measures must be implemented.
- The Estate Manager must be notified.
- The incident must be recorded in the Incident Register.
- Authorities must be notified where legally required.
- A corrective action plan must be implemented.
- A follow-up inspection must be conducted.

3.2.3.5 Complaint handling and recording

Complaint Lodging

Complaints may be submitted via:

- Email;
- Estate office;
- Security gate;
- WhatsApp estate platform;
- Written submission.

All complaints must record:

- Name of complainant;
- Contact details;
- Date and time;
- Nature of complaint;
- Location of issue;
- Supporting evidence (if available).

Complaint Register

The Estate Manager shall:

- Maintain a Complaint Register;
- Investigate complaints within 5 working days (or sooner for urgent matters);
- Record findings and corrective actions;
- Provide written feedback to the complainant;
- Record reasons where no action is taken.

The Complaint Register shall:

- Be kept for the life of the estate;
- Be available for review by Trustees;
- Be available for regulatory review upon request.

Common estate-related complaints may include:

- Noise disturbances;
- Waste management non-compliance;
- Construction activities;
- Water runoff;
- Pet control issues;
- Fire hazards.

3.2.3.6 Reporting and review

The Communication Programme shall:

- Be reviewed annually by the Body Corporate;
- Be updated when regulations change;
- Be aligned with updated ESMP requirements;
- Be included in AGM reporting to residents.

An annual Environmental Compliance Summary Report may be presented at the AGM outlining:

- Number of complaints received;
- Types of complaints;
- Incidents recorded;
- Training conducted;
- Improvements implemented.

4 REPORTING, COMPLIANCE AND ENFORCEMENT

4.1 ENVIRONMENTAL PERFORMANCE MANAGEMENT

This section outlines the overall monitoring commitments required for implementation during the construction, operational and decommissioning phases of the Project. It details procedures to ensure routine inspections and audits are conducted to ensure that the Project's activities are aligned and remain compliant with this ESMP.

4.2 CONSTRUCTION PHASE: ENVIRONMENTAL INSPECTIONS AND COMPLIANCE MONITORING

4.2.1 DAILY AND WEEKLY COMPLIANCE MONITORING

A copy of this ESMP will be on-site throughout the construction phase and will be available upon request. Contractors and subcontractors must be issued a copy of this ESMP. It is the responsibility of the Project manager to ensure this ESMP is complied with through their daily roles. Daily and weekly inspections will be undertaken by the Project manager. Any environmental concerns or impacts identified will be reported to the Project manager and actioned as soon as is reasonably practicable.

4.2.2 MONTHLY COMPLIANCE MONITORING

Monthly inspections will be undertaken by the Project manager to assess whether the standards and procedures set out in this ESMP are being complied with and that environmental control measures are in place and working correctly and effectively. Any non-conformance will be recorded, including the following details: a brief description of non-conformance, the reason for the non-conformance, the responsible party, the result (consequence), the corrective action(s) taken and any necessary follow-up measures required.

4.3 OPERATIONAL PHASE: ENVIRONMENTAL INSPECTIONS AND COMPLIANCE MONITORING

For this Project, responsibility for implementing and maintaining mitigation measures will be shared between the Site manager and the residents/Body corporate of the development.

The site manager will be responsible for all mitigation measures associated with the operational areas of the development. Responsibilities will cover dust suppression on gravel roads, proper maintenance of the infrastructure, waste collection points, firefighting equipment and ensuring development operations comply with safety and environmental regulations.

To ensure effective operational performance, the Site manager will develop and implement an audit and inspection programme. Regular inspections of all infrastructure will be carried out to

confirm that facilities are operating according to specifications and to detect any signs of deterioration. Any non-conformance will be formally recorded, including:

- A brief description of the non-conformance;
- The reason for the non-conformance;
- The responsible party;
- The result or consequence of the non-conformance;
- The corrective action taken; and
- Any necessary follow-up measures required.

This process ensures accountability, continuous improvement and early intervention where problems arise.

The residents and Body corporate will assume responsibility for mitigation measures within the residential areas of the development. Each resident will be required to properly manage their own property, including:

- Ensuring sewage connections are correctly installed, regularly serviced and functioning effectively;
- Implementing appropriate waste management practices, including segregation, storage and disposal via approved service providers;
- Managing household water use responsibly, making use of water-efficient systems and practices;
- Ensuring garden and landscaping activities avoid invasive species and prioritise indigenous, water-efficient plants; and
- Ensuring all solar power systems (e.g. solar panel arrays and battery systems) deployed obtain and comply with all required power generation licences, are correctly installed, regularly serviced, functioning effectively and are properly recycled or disposed of when decommissioned.

The Body corporate will oversee compliance across the development, provide centralised sewage and wastewater treatment systems, waste and recycling facilities, maintain common areas and enforce community environmental rules. They will also support residents in meeting legal obligations and coordinate collective initiatives such as water-saving programmes or estate-wide landscaping standards.

This division of responsibility, supported by a structured audit and inspection programme, ensures that both the commercial and residential components of the Project are managed sustainably, with accountability clearly assigned to prevent and minimise environmental impacts. Regular Body corporate meetings will be held with residents to provide feedback on areas of concern or requiring improvement.

4.4 REPORTING

All incident or non-compliances, including any environmental issues, wildlife crimes, failure of equipment or accidents, is reported to the Project manager or Site manager throughout the Project lifecycle. The MEFT reserves the right to require the Proponent to submit bi-annual reports evaluating the Project's compliance with the commitments that are outlined in this ESMP.

For large-scale spills (i.e., > 200 L) and other significant environmental incidents, the fire service should be notified as required and the MEFT office should be informed of the incidents (telephone +264 61 284 2111). If the spillage is of a fuel source (i.e. petrol/diesel), MIME must be notified by completing form PP/11 (telephone: +264 61 284 8111).

If significant environmental spills (hydrocarbons or untreated wastewater) occur close to or in a water source, the Department of Water Affairs (DWA) is to be notified. All correspondence with the relevant ministries should be by the Project manager or Site manager. Notification should occur no later than forty-eight (48) hours after the incident has occurred.

For the clean-up of smaller spills, the relevant material safety data sheet (MSDS) should be consulted to determine the appropriate clean-up procedure. Basic spill response training will be provided as part of the site environmental induction. Spill response equipment, including relevant MSDS copies, will be provided in areas where potentially environmentally hazardous chemicals are used.

Occupational incidents and accidents incurred on site should be reported to the authorities (i.e. Occupational Safety & Health Department) at the Ministry of Labour, Industrial Relation and Employment Creation (MLIREC), by using form F.5.

In case archaeological objects or heritage artefacts are discovered on-site, the chance find procedure must be followed and the NHC must be informed by the Project manager or Site manager.

All correspondence and communication with local and regulatory authorities should be undertaken by the Project manager or Site manager.

4.4.1 NON-COMPLIANCE

Where it has been identified that activities are not compliant with this ESMP, the Project manager (construction phase) and Site manager (operational phase) must ensure that corrective actions are implemented to the extent that the activities return to being compliant as soon as possible. In instances where the requirements of the ESMP are not upheld, a non-conformance and corrective action notice will be produced. The notice will be generated during the inspections, and the Project manager or Site manager will conduct follow ups to determine whether the corrective actions are implemented as planned and instructed.

A non-compliance event / situation is considered if:

- There is evidence of contravention of this ESMP and associated indicators or objectives;
- The contractors or subcontractors have failed to comply with corrective actions or other instructions issued to them by the Project manager, Site manager or qualified authority; or
- There is evidence of negligence in recording, investigating and responding to community complaints through the established reporting channels and grievance resolution mechanisms.

Depending on the severity, work will be stopped in the event of a non-compliance, until corrective action(s) has been completed. The non-compliance will be closed out once the Project manager or Site manager has inspected the corrective action and confirmed that the issue has been satisfactorily resolved.

4.4.2 DISCIPLINARY ACTIONS

This ESMP is a legally binding document. Non-compliance with its provisions may result in disciplinary and/or legal action(s) against the responsible party or parties. These actions may include, but are not limited to, the following:

- Legal actions in accordance with other applicable environmental and labour laws;
- Imposition of monetary fines or penalties on contractors or subcontractors;
- Termination of contractual agreements with contractors, subcontractors or suppliers;
- Requirement for immediate corrective or remedial actions at the violator's expense;
- Suspension or withdrawal of the Project approved licences, certificates and permits;
- Complete or partial suspension of Project activities until compliance is restored; or
- Disqualification from participating in future Project activities.

4.5 LICENCING REQUIREMENTS

Table 3 provides a list of permit and/or licence required for the Project.

Table 3 – Required permits, certificates and licences for the Project

Permit, licences or registration	Relevant authority	Project bearing
Environmental clearance certificate	MEFT	Required for all listed activities that may not be undertaken without an environmental clearance certificate. An environmental clearance certificate is issued by the Environmental Commissioner within the DEAF.
City of Windhoek Letter of Authorisation	City of Windhoek	Official authorisation letter should be obtained from the CoW for NamWater and the Proponent to proceed to the detail design and implementation of the proposed bulk water

Permit, licences or registration	Relevant authority	Project bearing
		infrastructure supply scheme directly to Heja Lifestyle Estate.
Approval for the rezoning, reclamation and use of municipal land	Surveyor-General's office (MURD)	Approval from the General Surveyor's office is required for the rezoning, reclamation and development on municipal land.
Land clearing permit	MEFT: DEAF	A land clearing permit must be obtained for any vegetation removal or relocation during the construction phase, in accordance with the Forest Regulations, 2015 (No. 170 of 2015) and application "Form 12" in the Regulations.
Licence for the development of permanent structures within 100 m of a riverbank (riparian zone)	MAFWLR	A licence is required for the development of permanent infrastructure within 100 m of a riverbank. This also include excavation works within a watercourse.
Water abstraction licence	MAFWLR	An abstraction licence is required for the abstraction of water from a borehole for commercial purposes. Part 11 (sections 44 - 45) of the Water Resources Management Act, No. 11 of 2013 and Part 5 (sections 44 - 45) of the Water Resources Management Regulations (No. 269 Of 2023).
Wastewater treatment, effluent discharge and reuse licence	MAFWLR managed through the City of Windhoek	A wastewater treatment, effluent discharge and re-use licence related to the sewage systems and effluent discharge should be obtained. Part 13 (sections 68 - 72) of the Water Resources Management Act, No. 11 of 2013 and Part 8 (sections 66 - 68) of the Water Resources Management Regulations (No. 269 Of 2023) (Annexure 11).
Borehole registration	MAFWLR	Mandates the registration of all boreholes (used, unused, dry) with the MAFWLR to ensure sustainable management and protection of water resources.
Transmission connection agreement	Namibia Power Corporation (NamPower)	The Project will be connected to the NamPower grid. Prior to this, it is required that the Proponent sign a contractual agreement with the national utility supplier (NamPower).

Permit, licences or registration	Relevant authority	Project bearing
Energy generation licence	Electricity Control Board (ECB)	Although energy will be supplied to the development by NamPower through a new reticulation system, photovoltaic (PV)-battery systems may be built to generate additional energy for the development. An energy generation licence or licences may be required if such systems exceed the energy generation licence requirement exemption limitations as stipulated in Section 18 of the Electricity Act of 2007. Excess energy generated could be supplied back to the NamPower grid.
Electricity transmission and supply licence	ECB	Individual homeowners, residents, businesses or the Heja Lifestyle and Country Estate development may decide to install solar PV-battery systems on individual properties to generate on-site electricity for their personal or business use. Such electricity could also be sold back to the NamPower electrical grid.
Certificate of registration	Ministry of Health and Social Services (MoHSS)	Should a private medical facility be established during the phased development of the Project, this Act mandates that a private health facility licence (in the form of a certificate of registration) must be obtained to establish, conduct or maintain any private health facility (such as a clinic or consulting room).
Consumer Installation Certificate	Ministry of Industries, Mines and Energy (MIME)	For the storage of fuel on site with bowers or tanks above 200 L of petrol in an urban area or more than 600 litres of petrol or diesel in a rural area.
NHC consent	NHC	NHC consent for the management, protection and preservation of heritage objects (particularly those buried in the subsurface and may be unearthed during excavation and earthworks), if discovered within the Project site. This will ensure compliance with the National Heritage Act, No. 27 of 2004.

5 ENVIRONMENTAL AND SOCIAL MANAGEMENT

5.1 ENVIRONMENTAL PERFORMANCE MANAGEMENT

Table 4, Table 5, Table 6 and Table 7 provide the overall management plans of potential environmental and social impacts of the Project during the planning, construction, operational and decommissioning phases. These plans provide mitigation and monitoring commitments, as well as the roles responsible for execution. The Project manager will use the construction management plan to undertake daily, weekly and monthly inspections to ensure the Project remains compliant with this ESMP during the construction phase. The operational management plan will be used by the Site manager to undertake inspections during the operational phase, including during routine maintenance activities and any ad hoc work as required.

This ESMP has been developed to guide the Project personnel, contractors and subcontractors through the different phases. This includes the following:

- **Planning phase:** Involves preparing for the construction phase by ensuring that the best available technology is procured for Project execution and operations. It also includes strategic planning for future expansion, such as the phased development of the estate. Applications for required permits and licences, including water abstraction and wastewater treatment, discharge and re-use licences, will also be initiated during this phase.
- **Construction phase:** Covers the undertaking of construction activities in accordance with industry best practices to develop on-site Project infrastructure. This includes the development security fencing, roads and associated infrastructure, as well as phased clearing and preparation for the development. Emphasis is placed on environmental protection and social responsibility to ensure minimal environmental disturbance, proper waste management and reduced impacts on neighbouring farms and communities.
- **Operational phase:** Encompasses the daily management of the residential and commercial aspects of the development. This will include maintenance of infrastructure, management of the wastewater treatment plant, irrigation of the green spaces and the implementation of safety and environmental management systems.
- **Decommissioning phase:** The decommissioning phase for the lifestyle and country estate will involve the orderly cessation of operations, removal of non-permanent infrastructure and rehabilitation of disturbed areas to ensure environmental stability and compliance with the EMA and legislative requirements. Temporary structures, equipment and waste materials will be removed and disposed of at approved facilities, while any hazardous substances will be safely managed. Disturbed surfaces such as redundant roads and parking areas will be re-contoured, stabilised and re-vegetated using indigenous or locally appropriate species to control erosion and restore landscape function. Permanent infrastructure may be retained or repurposed for alternative land

uses where feasible. Post-decommissioning, monitoring will be undertaken to confirm effective rehabilitation, erosion control and site safety.

5.1.1 PLANNING PHASE

This phase involves procuring all necessary Project materials, tools, equipment and consumables in preparation for the transition into the construction phase. Key materials such as cement, glass, wood and steel will be procured from the local markets and transported to the site for mobilisation. Materials that are not available in the local market will be imported. Contractors will be appointed to oversee the procurement process to ensure that all Project components are acquired on schedule.

The location and design of the infrastructure must harmonise with the natural environment as far as reasonably possible. The Proponent is responsible for ensuring that the development does not significantly alter or detract from the visual landscape and the area's sense of place.

Infrastructure standards and designs must be in accordance with the minimum engineering guidelines to ensure that the development is sustainable.

The specific requirements required during the planning phase are discussed in Table 4.

Table 4 – Environmental aspects, management and mitigation measures for the planning phase

Aspect	Management and mitigation measures	Responsibility
Job creation, skills development and business opportunities	– The Proponent, contractors and subcontractors must prioritise local employment, particularly for unskilled or semi-skilled labour; – Efforts should be made to enhance and support skills development and capacity building, wherever reasonably possible; – Goods, services and consumables must be sourced from the local and regional suppliers to stimulate the local economy and promote inclusive growth; and – Uphold fair recruitment practices.	– Project manager – Contractors – Subcontractors
Aesthetic and visual appeal	– Project planning should consider the visual appeal of the infrastructure and houses to be built on-site. Efforts must be made so that the infrastructure blends in with the natural surroundings; – The use of earth colours (paints) on structures and houses which are in harmony with the natural environment is strongly recommended; – Infrastructure standards and designs must be in accordance with the minimum engineering guidelines to ensure that the development is sustainable; – Infrastructure and housing development must be confined to the designated Project footprint (as per the architectural drawings) to minimise disturbance to surrounding non-targeted areas; and – Plan and design temporary on-site waste storage areas and end use/final disposal location off the Project site.	– The Proponent – Project manager
Water management	– Infrastructure standards and designs must be in accordance with the minimum engineering guidelines and DWA guidelines to ensure that the development is sustainable; – Design the Project infrastructure and housing to avoid encroachment on streams and catchment areas to avoid disturbance to natural surface water flows;	– Project manager – Construction team

Aspect	Management and mitigation measures	Responsibility
	– The infrastructure should be planned at least outside of 1:100 year return inferred floodline; – Erosion control measures should be considered with the design of the development, specifically where land will be cleared near the rivers and dam within the development boundaries; – Investigate water recycling options or alternative water-efficient systems/equipment that minimise water consumption. These should be prioritised and considered as best practices during the construction and operational phase, should they be deemed applicable; – Undertake a detailed flood assessment; and – Adhere to CoW flood elevation requirements for development.	
Wildlife management	– The security fence should be designed in a way that effectively keep wildlife out of the development area; – The fence design should also be wildlife-friendly (as far as reasonably possible), i.e., fences with reduced entanglement risks and without sharp wire spikes (especially concerning avifauna, which might get “hooked” during flight); and – Ensure ongoing engagement and collaboration with the surrounding farms and communities.	– Project manager
Fire management	– Develop site-specific fire management and emergency response procedures; and – Identify dedicated assembly points within the development.	– Project manager
Management of solid waste	– The Proponent must establish areas designated for temporary waste storage (including construction waste); – Develop a waste management plan to ensure waste is disposed of off-site, as required; and	– Project manager

Aspect	Management and mitigation measures	Responsibility
	– Ensure there is provision to reuse or recycle consumables and containers that require off-site disposal.	
Procurement, transport and storage of materials	– All the materials required for construction, namely: steel, bricks, cement, poles, fences, etc., must be sourced from registered suppliers; – Vehicles that transport building materials to the site must be roadworthy; – All drivers who transport materials must have valid driver's licences and must always adhere to traffic rules and regulations; and – The construction team shall locate and secure sand from permitted sources outside the Project areas, as sand mining is strictly prohibited.	– Delivery company employees (suppliers) – Contractors – Subcontractors

5.1.2 CONSTRUCTION PHASE

The construction phase will involve Project-related construction activities, which, with the implementation of the prescribed mitigation measures, are expected to result in low environmental impacts. During this phase, land will be cleared for the construction of the development's road network, central sewage network, wastewater treatment plant, central water supply network, central power supply network and Phase (1) one infrastructure of the development. Phase (1) one of the development will comprise the construction of the eastern area of the development, comprising of range of low-density to high-density residences. There will not be a contractor's camp on site and therefore the contractors will be transported back and forth daily to site. Supporting infrastructure will include intra-development roadways, as well as bulk electricity, water and sewage, however the wastewater treatment plant (WWTP) will be located off site, on portion 11 of Farm Hoffnung No. 66.

The total fenced area for the development will cover approximately 320 hectare (ha) and targeted mitigation measures will be undertaken to minimise the impacts on the receiving environment. Responsibility for environmental compliance during the construction phase rests with the Proponent, Project manager, contractors and subcontractors. The contractors will be accountable for all on-site construction activities.

The Proponent must ensure that the contractors and their subcontractors are fully informed of the ESMP requirements and that these are strictly enforced throughout the construction phase. The Project manager is responsible for conducting site inspections at least once a month to ensure that all the mitigation and management measures are being properly implemented and adhered to. Upon completion of construction activities, the Project manager must conduct a final site inspection and, if satisfied that the Project has been executed in accordance with the ESMP, issue the contractors with a letter of completion which confirms compliance and satisfactory Project outcomes.

Construction activities can be associated with accidents and spillages from vehicles, heavy machinery, low bed trucks, fuel bowzers and generators that generate excessive noise or heat, which may lead to public concerns or negative perception. The mitigation measures that must be implemented to minimise or prevent environmental damage, pollution or community nuisances are discussed in Table 5.

Table 5 – Environmental and social aspects, impacts, mitigation and monitoring measures for the construction phase

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
Noise	Community severance and disruption of social interactions.	- Provide advance notice to the neighbouring farm owners and communities prior to the commencement of construction activities. The construction schedule may be communicated through direct engagement or other appropriate engagement platforms deemed suitable; - Erect a noticeboard at the Project site boundary to inform the neighbouring community about the Project and the appointed contractors and subcontractors involved; - Conduct pre-start checks on equipment; - Nighttime work is strictly prohibited (i.e. construction activities must only be conducted between dawn and dusk); - Avoid unnecessary idling of equipment and machinery; - Ensure the best available technology with low sound power is sourced/procured; - A noise management procedure to be in place before construction activities commence; and - A complaints register must be kept. Complaints received should be addressed as per complaint handling procedures.	- Daily equipment/machinery pre-start checks - Noise complaint register	- Project manager - Contractors - Subcontractors
Visual	Disruption of the visual landscape and diminished sense of place.	- Maintain good housekeeping throughout the construction phase; - No nighttime work allowed; - Floodlights shall be used only where necessary (e.g. for security purposes), in order to minimise unnecessary light disturbance:	- Daily - Weekly	- Project manager - Contractors - Subcontractors

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
		– Dust suppression to be enforced; and – Equipment and machinery should only be retained on-site for the duration of the construction phase.		
Occupational health and safety	– Potential for injuries or fatalities to be sustained on-site.	– The Project manager shall ensure that occupational health and safety requirements are incorporated into the bidding and tendering processes to guarantee that all contractors and subcontractors comply with these standards; – Contractors and subcontractors should comply with all safety requirements outlined in the contracts signed with the Proponent; – Only contractor employees with specialised skills should be assigned tasks associated with injury risks; – Construction activities should only be conducted between dawn and dusk; – The consumption of alcoholic beverages and drugs is strictly prohibited on-site. Any individual suspected or found to be under the influence of alcohol/drugs shall be subject to disciplinary action; – All employees must be equipped with appropriate personal protective equipment (PPE) (e.g. work overalls, hard hat, gloves, steel capped safety boots etc.); – Conduct regular toolbox talks on occupational health and safety with all personnel involved in construction activities;	– Daily – Weekly – Monthly	– Project manager – Contractors – Subcontractors

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
		– A first aid kit must always be kept on-site and must be easily accessible; – Ensure that semi-skilled workers (if employed) receive comprehensive training and clear instructions on safe handling of tools and equipment; – The Project manager must conduct regular site inspections to monitor compliance with safety standards (e.g. ensuring that tools are securely stored and PPE is properly worn by the workforce); and – Maintain records of all injury statistics, track corrective actions and record lessons learnt to improve safety practices on-site.		
Air quality	– Dust generation, visual nuisances and complaints.	– Ensure that all land preparation and clearing activities are limited to the defined Project footprint to avoid unnecessary environmental disturbances; – Designate a cement and concrete handling zone, on an impermeable surface or tarp; – Take necessary measures to cover and secure cement bags to minimise wind-blown dust and material loss; – Vehicles and machinery should be maintained to limit exhaust fume emissions; – Dust-generating activities should be avoided during strong wind events; – Where an effect is profound, ensure dust suppression measures are in place;	– Daily – Weekly – Monthly	– Project manager – Contractors – Subcontractors

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
		– Employees should use and wear appropriate PPE (e.g. dust masks); – Project vehicles must be confined to existing roadways. No off-road driving allowed; – A complaints register must be kept on-site. Any complaint received must be addressed following the grievance resolution procedures; and – Restrict speed of vehicles (<40 km/h) on-site to minimise dust generation.		
Noise	– Varying levels of noise cause occupational health and safety impacts.	– Use well-maintained equipment fitted with effective silencers and mufflers; – Select low-noise machinery and tools, where feasible; – Install acoustic enclosures or barriers around stationary noisy equipment (e.g., generators, compressors); – Restrict access to designated high-noise zones to essential personnel only; – Provide appropriate hearing protection (earplugs, earmuffs, or dual protection to workers working in very high noise areas); – Ensure mandatory use of hearing protection in areas exceeding safe noise levels, which is >85 dB(A) on an eight (8)-hour work shift according to IFC general EHS guidelines; – Ensure noise doesn't exceed 55dBA during the daytime (07:00-22:00) and in the case of any emergency night work should not	– Daily – Weekly – Monthly	– Project manager – Contractors – Subcontractors

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
		exceed 45 dBA (22:00-07:00) to minimise disturbance to any nearby noise sensitive receptors; – Routine inspections to ensure that PPE is being worn and utilised correctly; – Conduct induction training covering noise hazards and hearing protection requirements; – A complaints register must be kept on-site. Complaints received must be addressed following the grievance redress procedures; – Construction activities shall only be conducted between dawn and dusk; and – Educate workers to recognize early symptoms of hearing damage (e.g., ringing ears, temporary hearing loss etc.).		
Soil	– Potential for soil contamination, soil erosion and disturbances.	– All fuel (including fuel bowsers), hydrocarbon and chemical containers shall be stored on an impervious base, be bunded and capable of containing at least 110% of the total capacity of the storage container; – As per conditions of consumer installation certificate if applicable; – All fuel, hydrocarbon and chemical storage containers must be placed on stable ground to prevent them from tipping over or spillage; – All vehicles, machinery and equipment to be serviced as required to reduce the risk of hydrocarbon spillages;	– Daily – Weekly – Monthly	– Contractors – Subcontractors – Project Manager

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
		– Major servicing of equipment should be conducted off-site; – Fully stacked spill kits are to be kept on-site (where required); – Dispensing of fuel or hydrocarbons to be conducted by trained personnel and over a steel drip tray; – A standard operating procedure to be developed for the dispensing of fuel and hydrocarbons; – Spill kits and absorbent material to be readily available on site and personnel trained on how to use the equipment and respond to spillages; – Contaminated waste and/or soils to be removed off site for further treatment and disposal; – MSDS are to be kept for each chemical or hydrocarbon used on-site. These must be accessible to all personnel; – Spills are to be stopped at the source as soon as possible; – Spilt material is to be contained to the smallest area possible using a combination of absorbent materials, earthen bunds or containment methods; – Spilt material is to be recovered as soon as possible using appropriate equipment. In most cases, it will be necessary to excavate the underlying soil until clean soil is encountered; – Recovered contaminated soil must be disposed of at an appropriate disposal facility; – The Project manager is to be informed as soon as possible in the event of a spill;		

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
		- Large spills must be reported immediately to MEFT. If hydrocarbon and petroleum spills of >200 L occur, MIME must be informed. If these spills occur close to or in the riverbeds/channels, then DWA are to be informed within forty-eight (48) hours; - Indigenous vegetation should be planted to prevent erosion; - Rock beds should also be used to prevent erosion on the gentle slopes around infrastructure (should be considered near the river); - Try to keep soil disturbances to a minimum, for example, only prepare the soil / ground as required for the construction of the development and its associated infrastructure; - Use existing access roads as far as reasonably possible (no off-roading); and - Store and retain topsoil and subsoil removed from the construction areas for later use during reestablishment (where possible).		
Water resources management	Water abstraction could potentially lead to a reduction in local water availability.	- Water must be used sparingly during the construction phase (e.g. turn off pumps when abstraction is not required); - No stagnant/pooling water; - All taps, pipes and tanks must be properly maintained and managed to prevent leaks; - Water leakages or pipe bursts should be reported and fixed as soon as possible;	- Daily - Weekly - Monthly	- Proponent - Project manager - Contractors - Subcontractors

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
		- Reservoirs used for temporary storage of water must be covered to reduce water loss through evaporation; and - Should additional water be required for the Project the Proponent may result to abstracting groundwater. Should this occur continuous monitoring of water abstraction rates will be required to assess actual water usage and ensure alignment with Project demands. This will also ensure that the sustainable borehole yield is adhered to throughout the construction phase. - Additionally, should the Proponent decide to utilise ground water resources, the Proponent will then be required to apply and obtain the respective borehole and abstraction licence(s) from the Department of Water Affairs and Forestry.		
Surface water	Runoff changes could be expected due to the construction of infrastructure which will increase the presence of impermeable surfaces.	- Implement a stormwater management plan; - Establish 1:5, 1:10, 1:50 and 1:100 return interval flood lines and potential volumes; - Assess downstream ecological water requirements and need for intervention/ periodic releases (dam or groundwater); - Disturbance to watercourses and natural flow paths shall be minimised to the greatest extent practicable; and - Altered watercourses should be modified in such a way that allows upstream areas to route back into the natural watercourse downstream of such or facilitate flow (e.g., development of culverts).	As per the stormwater management plan.	- Project manager - Contractors - Subcontractors

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
	Operation of earthmoving machinery or maintenance of vehicles, discharge of insufficiently treated or raw wastewater, run off of fertilizers from revegetated areas, litter and household chemicals.	- Implement a stormwater management plan; - Provide sufficient waste disposal options/facilities; - Store any chemicals and hydrocarbons on impermeable, bunded areas; - Ensure sufficient capacity for wastewater overflows and emergency discharges; - Develop and implement standard operating and maintenance procedures for wastewater treatment works (WWTWs); - Conduct period checks of all reticulation systems; and - Obtain a wastewater treatment, effluent discharge and reuse licence from DWA. - As per conditions of the wastewater and effluent discharge licence conditions	Bi-annual surface water quality sampling of dams, standing water and effluents.	- Contractors - Subcontractors
	Flooding.	- Ensure flow paths (spillways, culverts, pipelines, canals, natural drainage lines) remain unobstructed and have sufficient capacity; and - Adhere to CoW flood elevation requirements for development.	Implement surface water capacity and rainfall monitoring (Hoffnung Dam stage monitoring and on-site rain gauges).	- Project manager - Contractors
Groundwater	Domestic waste, raw wastewater, fertilisers, pesticides and household	- Impermeable and bunded areas as per stormwater management plan. - Provide sufficient waste disposal options/facilities; - Ensure sufficient capacity for wastewater overflows and emergency discharges;	Implement a groundwater monitoring network near production boreholes	- Project manager - Contractors

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
	chemicals infiltrating the subsurface.	– Develop and implement standard operating and maintenance procedures for wastewater treatment works (WWTWs); – Conduct period checks of all reticulation systems; and – Obtain a wastewater treatment, effluent discharge and reuse licence from DWA. – As per conditions of the wastewater and effluent discharge licence conditions – Limited groundwater use. – Groundwater abstraction licence from DWA if abstraction is practiced. – Routine monitoring of groundwater levels and abstraction monitoring. – Alternative water supply options and – water resilience strategies.	and ablution facilities or WWTP. – Adhere to the wastewater treatment, effluent discharge and reuse license conditions.	
Domestic, construction and hazardous waste management	– Litter and visual nuisance. – Soil pollution. – Disturbance to local fauna and flora.	– Ensure consistent and effective housekeeping is maintained on-site throughout the construction phase; – No food scraps or cigarette butts to be thrown on the floor. Designated tea rooms/dining areas and ash trays to be provided; – Litter generated during construction activities, such as cement bags and scrap metals, must be collected and stored directly in the waste receptors; – All construction waste (either combustible or non-combustible) temporarily stored on site must be stored securely in waste	– Daily – Weekly – Monthly	– Contractors – Subcontractors

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
		drums that must be disposed of off-site at Windhoek's Kupferberg landfill site and recyclable waste can be disposed of at the Windhoek Rent-A-Drum site; - No construction waste may be burnt or buried on-site; - No paint, solvents, thinners, diesel, oil or any other harmful substances may be poured onto the ground or any drainage systems; and - Empty containers and oil filters (if used) should be removed from the site and disposed of at a registered hazardous waste facility (Windhoek's Kupferberg landfill site).		
Wastewater (effluent) management	- Odours and health risks.	- Sufficient chemical toilets to be provided during construction, for females and males separate; - Chemical toilets need to be cleaned/pumped regularly by the relevant authority or registered company with the appropriate permits in place (if applicable); - All ablution facilities must be maintained, repaired and cleaned (preferably with biodegradable products) as required, with appropriate hands washing facilities and potable drinking water for construction personnel; and - No employee or contractor on-site may relieve himself or herself in the surrounding environment or work area.	- Daily - Weekly - Monthly	- Project manager - Contractors - Subcontractors
Flora	- Potential introduction and spread of alien or	- Construction activities must be confined strictly to the designated development areas to prevent unnecessary disturbance to the surrounding environment;	- Daily - Weekly - Monthly	- Proponent - Project manager

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
	invasive plant species. – Potential removal of protected plant species in the Project area.	– Conduct thorough weed and seed inspections on all equipment, tools, machinery and delivered materials to prevent the potential introduction and spread of alien or invasive plant species (Appendix B); – Land should not be cleared, nor protected plant species removed without the land clearing permits from the Department of Environmental Affairs and Forestry; – The designated construction areas should be assessed (search and rescue exercises) for potential rare, endangered, threatened and protected plant species prior to any land clearing activities. Where possible, rescue and relocate plants of significance. – Appropriate permits / licences from the DEAF should be in place such as the tree harvesting permit from DEAF. – Compliance with the conditions of the harvesting permit. – Demarcate road networks prior to construction to ensure minimal disruption to vegetation and to maintain organised access routes; – Where practical, schedule major vegetation clearing outside peak breeding seasons to reduce impacts on nesting or sheltering fauna; – Implement progressive rehabilitation of disturbed areas not required for ongoing construction, using indigenous or locally adapted species appropriate to the disturbed urban setting;	– As per land clearing permit conditions	– Contractors – Subcontractors

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
		– Prevent the spread of invasive species by cleaning construction equipment, managing disturbed soils and removing invasive plants during rehabilitation; – Provide all contractors with environmental awareness training highlighting vegetation clearing limits, fauna protection procedures and reporting requirements; – Regularly inspect cleared and rehabilitated areas to ensure compliance with approved clearing boundaries and the effectiveness of rehabilitation measures; – Off-roading is strictly prohibited; – Vegetation within the development area's riparian zones, particularly large trees, should not be removed. If removal is unavoidable, the necessary permits or licences must first be obtained from the DEAF and DWA; – No veld fires or controlled burns are permitted at any time; and – The use of herbicides on-site should be avoided as far as reasonably possible, particularly in the vicinity of the development area's riparian zones.		
Wildlife management	– Illegal hunting (poaching). – Potential to encounter and interact with wildlife on-site	– No wildlife should be removed from the site by anyone other than a professional/registered animal handler, pest control company, Society for the Prevention of Cruelty to Animals (SPCA), MEFT/MAFWLR or relevant rehabilitation or wildlife organisations;	– Daily – Weekly – Monthly	– Proponent – Project manager – Contractors – Subcontractors

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
	during the construction phase.	– No wildlife shall be poached, consumed, harmed or killed for illegal practices (e.g., illicit trade of pangolins for scales); – Prevent the killing of perceived dangerous species (e.g. snakes, scorpions); – Where less mobile fauna (e.g. reptiles, small mammals) are encountered during clearing, implement capture and relocation procedures to suitable nearby habitats outside the construction footprint; – The collection of veld foods (e.g. tortoise, monitor lizard) and any form of poaching (e.g. setting of snares for birds and ungulates, etc.) is strictly prohibited. – Police and MEFT should be notified of any poaching incident involving sensitive or protected species or if such an animal is found on someone within or surrounding the Project site; – If snares or poaching equipment are found in the field, they should be removed and destroyed; – Fences should be monitored for potential snares and traps; – Any staff members caught engaging in such an activity shall be handed over to the authorities and shall be dismissed from the contract; – The unauthorised use of surveillance equipment (e.g. drones) on-site is strictly prohibited; – Nests discovered on infrastructure within the Project site area should not be removed or destroyed;		

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
		– Pesticides and herbicides should not be used as far as reasonably possible; – If there is no other possibility, the relevant pesticides, herbicides, chemicals should be used by a professional or registered pest control company and the MSDS of the substance used should be closely followed; – If baboons or scavengers become a nuisance during construction activities, install baboon proof latches to prevent them from accessing site offices, machinery, equipment, storage areas and waste receptacles; and – The construction team must maintain a high level of housekeeping to prevent odours, vermin and pests.		

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
Traffic	– Temporary construction traffic impacts. – Increased operational traffic and turning movements. – Intersection and access capacity constraints. – Non-motorised transport and pedestrian safety impacts. – Public transport and parking-related operational effects.	– The mitigation measures recommended in the Traffic Impact Assessment (TIA) shall be incorporated into the design and implementation of all roads, intersections and crossing upgrades associated with the Project, taking into account the relevant phase of development during which such measures are required; – Implementation of these measures shall be subject to technical and financial feasibility, recognising that certain adjustments or refinements may be necessary as the Project progresses; and – Ongoing coordination and consultation should be maintained between the Proponent, the appointed traffic specialist and the Roads Authority to ensure that all required modifications are implemented in accordance with the specialist's recommendations, Project phase requirements, and applicable regulatory standards.	– Monthly as per road construction masterplan	– Proponent – Site manager – Contractors – Subcontractors
Historical, archaeological and cultural heritage	– Potential damage to heritage or undiscovered archaeological finds during	– From the geographic information system (GIS) database, no archaeological sites are present on-site, but the chance find procedure (Appendix A) must be adopted and followed throughout the construction phase in case archaeological remains are to be uncovered;	– Chance find procedure	– Proponent – Project manager – Contractors – Subcontractors

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
	construction activities.	– If archaeological remains are uncovered, cease activities and the Project manager has to assess and demarcate the area; – No surface scatters or artefacts shall be collected, or damaged in any way; – Demarcate a five (5) m radius of the site to prevent further encroachment or disturbance; – Raise awareness about possible heritage finds; – Report all finds that could be of heritage importance; – Project manager to visit the site and determine whether work can proceed without damage to findings, mark the exclusions boundary and inform the EAP with the global positioning system (GPS) position; – If required, further investigation has to be requested for a professional assessment, and the necessary protocols of the chance find procedure have to be followed; – An archaeologist will evaluate the significance of the finds and identify appropriate action(s), (record and remove; relocate or leave premises, depending on the nature and value of the remains); – Inform the police if the remains are human; and – Obtain appropriate clearance or approval from the competent authority (NHC), if required, recover and remove the remains to the National Museum or National Forensic Laboratory as directed.		

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
Security (overnight guarding of the Project site)	– Theft of construction materials and other related security concerns.	– No visitors are allowed without prior approval from the Project manager; and – If a security guard is required, he/she must be sourced from a formally registered security company, and basic amenities must be provided.	– Daily	– Project manager – Contractors – Subcontractors – Security personnel
Stakeholder engagement	– Non-compliance with environmental clearance conditions, stormwater management requirements, municipal building regulations, road access standards, and water/sanitation approvals. – Structural or service failures affecting residents.	– The Developer shall permit authorised representatives from MEFT, DWA, MURD and other competent authorities unrestricted access to the site for inspection and familiarisation purposes throughout the construction period.	– Ad-hoc	– Proponent – Project manager – Contractors

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
Post construction environmental restoration	– Landscape degradation, visual nuisance and unrehabilitated disturbed areas.	– Following the completion of construction activities, a final site inspection must be conducted across all work areas to verify that all partially disturbed areas have been restored in accordance with the requirements outlined in this ESMP; and – Contractors and subcontractors must be issued compliance certificates upon successful completion of work, provided ESMP requirements are met.	– Once-off – Final site approval exercise post-construction activities – Obtain building compliance certificates	– Proponent – Project manager – Contractors – Subcontractors

5.1.3 OPERATIONAL PHASE

This section outlines the management, mitigation and monitoring measures to be implemented during the daily operation and management of the development. During the operational phase, the Project will include the active residence of low-density to high-density housing residents, the operation of commercial businesses and the labour of development business staff, maintenance staff and administrators. Visitors to the development to visit residents, commercial businesses or partake in nature estate activities will do so under controlled conditions. Operational management will ensure that residents, visitors and staff activities are conducted safely and with minimal impact on the surrounding environment.

The specific environmental management measures and monitoring requirements required for implementation during the operational phase are discussed in Table 6.

Table 6 – Environmental and social aspects, impacts, mitigation and monitoring measures for the operational phase

Aspect	Potential impact	Management and mitigation measures	Monitoring requirement	Responsibility
Domestic and hazardous waste management	– Littering, visual nuisance, odours and health risks.	The Site manager will be responsible for implementing and monitoring mitigation measures related to the development infrastructure and operations, while the residents and Body corporate will be responsible for managing environmental measures within the residential areas, including: – Implementing the waste management hierarchy across all operational areas (avoid, reuse, recycle and then dispose of); – Residents are to manage their household wastes. Body corporate to provide centralised collection, enforce segregation and contract licenced waste service providers; – Maintain good housekeeping across the site; – Provide clearly labelled waste bins to encourage proper waste sorting (if applicable); – Temporary solid waste shall be stored in a designated area, kept covered, and periodically collected by a registered service provider for disposal at the City of Windhoek's Kupferberg Landfill; – Recyclable waste to be sent to Rent-A-Drum; – The waste storage area must always be kept clean and tidy; and – Degraded solar photovoltaic-battery system components (i.e. degraded solar panels and batteries) that can no longer power the development infrastructure must be properly recycled or disposed of at licenced recycling facilities or hazardous waste sites as applicable.	– Daily – Weekly – Monthly	– Site manager – Body corporate and residents

Aspect	Potential impact	Management and mitigation measures	Monitoring requirement	Responsibility
Wastewater (effluent) management	– Leakage and seepage of effluent into water resources. – Odours and disease transmissions	– All ablution facilities must be regularly inspected, maintained and repaired as required; – No person on-site may relieve himself or herself in the surrounding environment or work area; and – A wastewater treatment, effluent discharge and re-use licence must be in place and licence conditions should be adhered to; – The wastewater treatment plant will need to be maintained and inspected by the Site manager and wastewater treatment personnel; – Treated effluent water should be tested as stipulated, to ensure that it complies with relevant legislation and Namibian special standards; – Effluent not treated to the required Namibian special standards should not be discharged into any sensitive habitat/area (i.e., dam, river or stream); and – If a major pipe burst or leak has been discovered in the centralised sewage network, groundwater will need to be monitored and tested to ensure that there is no contamination and DWA must be informed within forty-eight (48) hours.	– As per the wastewater treatment and effluent discharge licence conditions	– Proponent – Site manager – Body corporate – Maintenance team
Groundwater resources management	– Potential decrease in water availability due to the	– An abstraction and water use licence should be in place (for abstracting water from boreholes for emergency drought relief) and reporting as required; – All boreholes used for the Project (if any) are required to have operational flow meters installed and monthly groundwater levels	– Daily – Weekly – Monthly	– Proponent – Site manager – Body corporate

Aspect	Potential impact	Management and mitigation measures	Monitoring requirement	Responsibility
	abstraction of water.	monitored, either by manual means or through installation of automated level loggers. – The groundwater levels and loggers should be downloaded and/or measured on a monthly basis. – Monthly monitoring of volumes and flow rates will allow changes in groundwater level and resource potential to be monitored for early warnings of stress and timeous mitigation; – Turn off pumps when abstraction is not required; – Adopt a water-wise mindset on site; – Water should not be wasted, especially with high water use activities like swimming pools; – Effective and water saving methods should be used for the gardening on-site; – Water leakages or pipe bursts should be reported and fixed as soon as possible; – Should there be a desire for ornamental plants on site, drought-resistant species should be considered; – Eco-friendly and low water use equipment should be considered (i.e. eco-friendly showerheads and taps (where possible)); – Activities that require excessive use of water should be monitored to ensure water is used efficiently; and – Ensure that the water volumes required for cleaning of any solar panel arrays are adequately accounted for.		

Aspect	Potential impact	Management and mitigation measures	Monitoring requirement	Responsibility
Biodiversity management	– Interaction with biodiversity. – Potential introduction and spread of alien or invasive species.	– Poaching, possession and consumption of game and game products is strictly prohibited; – Police and MEFT should be notified of any wildlife crime incidents; – Bird nests discovered on infrastructure should not be removed or destroyed; – If snares or poaching equipment are found in the field, they should be removed and destroyed; – Fences should be monitored for potential snares and traps; – All staff and residents should be informed in writing about the consequences of breaching established rules (i.e., possession of a firearm, poaching, removal of protected species, etc.); – Pesticides and herbicides should not be used as far as reasonably possible; – If there is no other possibility, the relevant pesticides, herbicides or chemicals should only be used by a professional or registered pest control company and the MSDS of the substance used should be closely followed; – Invasive plant species should be removed and their spread should be prevented; and – Waste on-site should be well managed and removed from the site to prevent animals (i.e., rodents, snakes, scorpions, etc.) from breeding or living on-site.	– Daily – Weekly – Monthly	– Proponent – Site manager – Body corporate and residents

Aspect	Potential impact	Management and mitigation measures	Monitoring requirement	Responsibility
Historical, archaeological and cultural heritage	– Potential damage to heritage or undiscovered archaeological finds during the operational phase.	– In the event that heritage objects or sites are discovered, the chance find procedure must be adopted and followed (Appendix A).	– Chance find procedure	– All staff and residents
Occupational, visitor, residents and community health and safety	– Potential injury or loss of life to operational activities.	– A health and safety management plan should be developed and implemented on-site by the Proponent; – Appropriate PPE should be used for relevant tasks on-site (i.e., ear protection, etc.), particularly during maintenance work; – All relevant development duties and safety measures, regulations and best practices should be adhered to; – Ensure frequent maintenance of all equipment and daily inspections are conducted; – Firefighting equipment should be installed across relevant areas on site; – Residents should ensure that suitable firefighting equipment (e.g., fire extinguishers) is available and that emergency contact details are easily accessible; – Ensure key personnel are trained to manage an emergency fire situation;	– Daily – Weekly	– Proponent – Site manager – Body corporate – Residents

Aspect	Potential impact	Management and mitigation measures	Monitoring requirement	Responsibility
		- Occupational incidents and accidents on-site should be reported to the division: Occupational Safety & Health (OSH) at the Ministry of Labour, Industrial Relation and Employment Creation, by using form F.5; - No unauthorised use of equipment should be allowed; - Appropriate warning and emergency signage should be added where required (i.e., access restriction, assembly points, etc.); - In the unlikely event of a death occurring within site boundaries from occupational negligence or otherwise from a "freak accident event", the area should be secured and all personnel removed from the scene; - A root cause analysis into the event should be undertaken as soon as possible; - Counselling should be provided to the witnesses and other personnel members who may have been impacted by the event; - Appropriate safety signs should be added near dangerous areas or equipment; and - Staff should be made aware of all possible health and safety risks.		
Fire management	Potential fire at the development, posing a risk to residents, neighbouring	- Develop a site-specific fire management and emergency response plan; - Implement the required fire protections; - Identify and signpost dedicated assembly points within the Estate; - Equip site areas with appropriate firefighting equipment (e.g. fire extinguishers, fire hydrants or sand buckets as is required); and	Project lifespan	- Proponent - Site manager - Body corporate

Aspect	Potential impact	Management and mitigation measures	Monitoring requirement	Responsibility
	farms, communities and infrastructure.	Emergency contact details should be readily available on-site and updated regularly as needed.		
Noise	Potential noise nuisance to residents and neighbouring communities.	- Ensure mandatory use of hearing protection in areas exceeding safe noise levels, which is >85 dB(A) on an eight (8)-hour work shift according to IFC general EHS guidelines; - Ensure noise doesn't exceed 55dBA during the daytime (07:00-22:00) and in the case of any emergency night work should not exceed 45 dBA (22:00-07:00) to minimise disturbance to any nearby noise sensitive receptors - The Proponent should develop a health and safety management plan that takes into account noise generation; - Appropriate PPE should be worn when working near loud machinery; - Neighbouring residents should be consulted with regard to the development's events or activities that may generate excessive noise (e.g. musical performances or events); - Implement some restrictions on event times (i.e., early mornings or nighttime hours) to minimise noise during these hours when noise impacts may be more evident (where possible); - Ensure that procedures for receiving complaints from nearby land users or residents are in place and responded to timeously; and	- Noise complaint register - Daily - Weekly - Monthly - Annually	- Proponent - Site manager - Body corporate and residents

Aspect	Potential impact	Management and mitigation measures	Monitoring requirement	Responsibility
		If numerous complaints are submitted due to noise nuisance, a noise specialist study should be conducted to determine what additional mitigation measures should be implemented.		
Security	Theft and other related security concerns.	- Fences should be well maintained; - Suitable security and access controls should be implemented for the residential areas; - Any crime related activities on-site should be reported to the police immediately; and - If security guards are required, they must be sourced from a formally registered security company.	Daily	- Site manager - Body corporate and Security personnel
Career uplifting opportunities	Skills development.	Engage in general environmental awareness, skills empowering, career advancing workshops and training (i.e. first aid training, technical and software skills training).	- Ad hoc basis - As per HR policy	- Proponent (HR department) - Site manager
Community relations	Strong working relationship with the neighbouring farms, communities, key stakeholders and regulatory authorities.	- The Proponent and Site manager must represent the Project by maintaining good working relations with the surrounding residents, neighbouring farms, communities and regulatory authorities; - There should be regular communication with these groups regarding the Estate activities; - They should also be aware of the process to be followed in case they want to lodge a complaint; - Hold occasional focus group meetings as the need arises to address any concerns; and	Annual general meetings	- Proponent - Site manager - Body corporate

Aspect	Potential impact	Management and mitigation measures	Monitoring requirement	Responsibility
		– Consider monthly resident forums		

5.1.4 DECOMMISSIONING PHASE

The decommissioning phase represents the final stage of the Project lifecycle and will involve the orderly cessation of activities, removal of non-permanent infrastructure and rehabilitation of disturbed areas. Although decommissioning activities are expected to be limited in extent and duration, they may give rise to temporary environmental and social impacts, if not properly planned or managed. This section outlines the potential impacts associated with the decommissioning phase and identifies appropriate mitigation measures to ensure compliance with the EMA and legislative requirements, promote environmental stability and restore the site to a safe and acceptable natural conditions.

The specific environmental management measures and monitoring requirements required for implementation during the decommissioning phase are discussed in Table 7.

Table 7 - Environmental and social aspects, impacts, mitigation and monitoring measures for the decommissioning phase

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
Vegetation disturbance and soil degradation	Removal of infrastructure and rehabilitation activities may result in temporary vegetation disturbance, soil compaction, erosion and exposure of bare soil surfaces.	- Limit decommissioning activities strictly to previously disturbed areas; - Remove foundations and hard surfaces with minimal ground disturbance; - Rip compacted soils to improve infiltration and root penetration; - Rehabilitate disturbed areas using locally indigenous or site-appropriate vegetation; and - Implement erosion control measures such as contouring, mulching or temporary berms, where necessary.	- As per rehabilitation management plan - Daily - Weekly - Monthly	- Proponent - Site manager - Contractors
Generation of solid and hazardous waste	Decommissioning activities will generate rubble, scrap metal, packaging waste, and potentially hazardous materials (e.g. fuels, oils, concrete residues).	- Prepare and implement a decommissioning waste management plan; - Segregate waste at source into recyclable, reusable, and disposal streams; - Dispose of hazardous waste at approved facilities in accordance with national regulations; - Recycle scrap metal and reusable materials, where feasible; and - Prohibit burning or burial of waste on site.	- As per rehabilitation management plan - Daily - Weekly - Monthly	- Proponent - Site manager - Contractors

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
Dust and air quality deterioration	Demolition and material handling may generate dust emissions, temporarily affecting local air quality.	- Suppress dust using water spraying during dry and windy conditions; - Cover transported materials to prevent windblown dust; - Limit vehicle speeds on unpaved surfaces; and - Schedule dust-generating activities during periods of low wind, where possible.	- Daily - Weekly - Monthly	- Proponent - Site manager - Contractors
Noise and vibration disturbance	Use of heavy machinery during dismantling activities may cause short-term noise and vibration impacts to surrounding receptors.	- Restrict decommissioning activities to normal working hours (between dawn and dusk); - Maintain equipment to minimise excessive noise; - Notify nearby land users in advance of noisy activities; and - Avoid simultaneous operation of multiple high-noise equipment, where practicable.	- Noise complaint register - Daily - Weekly - Monthly	- Proponent - Site manager - Contractors
Traffic and access disruptions	Increased movement of heavy vehicles during the decommissioning phase may pose safety risks and	- Develop and implement a traffic management plan for the decommissioning phase; - Use designated access routes and avoid unnecessary travel through sensitive areas; - Clearly mark entry and exit points; and - Ensure vehicles are roadworthy and drivers are appropriately licensed.	As per traffic management plan	- Proponent - Site manager

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
	temporarily affect local traffic flow.	– Vehicles used during or part of the decommissioning phase should avoid moving during peak traffic hours		
Health and safety risks	– Workers may be exposed to safety hazards associated with demolition, heavy machinery and waste handling.	– Implement a site-specific occupational health and safety plan; – Ensure all workers receive safety induction and task-specific training; – Provide appropriate PPE; and – Secure the site to prevent unauthorised access during decommissioning.	– As per occupational health and safety plan – Daily – Weekly	– Proponent – Site manager – Contractors
Visual impact and site aesthetics	– Temporary visual degradation may occur during dismantling and rehabilitation activities.	– Remove all infrastructure, debris, and waste materials upon completion of decommissioning; – Re-contour the site to blend with surrounding landforms, where required; – No stagnant or water pools; and – Rehabilitate and revegetate exposed areas promptly to restore visual quality.	– As per rehabilitation management plan	– Proponent – Site manager – Contractors
Residual environmental contamination	– Potential contamination of soil from hydrocarbons or deconstruction-related substances if not	– Inspect the site for signs of contamination during decommissioning; – Remove and remediate contaminated soil in accordance with approved procedures; and – Store fuels and chemicals in bunded areas until removal from site.	– Daily – Weekly – Monthly	– Site manager – Contractors

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
	properly managed.			
Final inspection and compliance	Decommissioning work may not meet the City of Windhoek's building, safety, or service delivery standards	A final site inspection shall be conducted with the City of Windhoek, after which the Proponent may be issued a formal compliance or completion certificate if the work meets the required standards.	Once-off	- Proponent - Project manager

6 IMPLEMENTATION OF THE ESMP

This ESMP:

- A. Has been prepared pursuant to the contract with the Proponent;
- B. Has been prepared on the basis of information provided to ECC up to April 2026;
- C. Is for the sole use by the Proponent, Heja Lifestyle and Country Estate staff, contractors and subcontractors during the construction, operational and decommissioning phases;
- D. Must not be used by any person other than (1) the Proponent, (2) Contractors and subcontractors; and
- E. Must not be copied without the prior written permission of ECC.

APPENDIX A - CHANCE FIND PROCEDURE

This section covers the procedures, reporting and management of sites or items of heritage significance should they be discovered, encountered or unearthed within the site operational areas.

Scope: The "chance finds" procedure covers the actions to be taken from the discovery of a heritage site or item to its investigation and assessment by a trained archaeologist or other appropriately qualified person.

Compliance: The "chance finds" procedure is intended to ensure compliance with relevant provisions of the National Heritage Act, No. 27 of 2004, especially Section 55 (4) which states that: "a person who discovers any archaeological object must as soon practicable possible report the discovery to the Council". The procedure of reporting set out below must be observed so that heritage remains reported to the NHC is correctly identified in the field.

Responsibilities:

Contractors/employees/residents – to exercise due caution if archaeological remains are discovered.

Project manager (construction phase) and Site manager (operational phase) – to secure the site and advise management timeously and determine safe working boundaries and request for inspection.

Archaeologist – to inspect, identify, advise management and recover remains.

Table 8 provides the environmental aspects and impacts, mitigation and monitoring measures for archaeological and heritage aspects.

Table 8 - Archaeological and heritage aspects

Responsibility:	– The Project manager, Site manager, residents, staff, contractors and subcontractors
Potential issues or impacts:	– Impact on heritage features.
Management /mitigation measures	
Potential to unearth heritage objects or resources	– All Project personnel and contractors should be aware of the protected archaeological site and the legal obligation to report any new findings to the NHC immediately. Should a heritage site or archaeological site be uncovered or discovered, particularly during the construction or operational phase, a chance find procedure should be applied in the order they appear below:

	- If operating machinery or equipment, stop work; - Demarcate the site with danger tape; - Determine GPS position if possible; - Report findings, site location and action taken to the Project or Site manager; - Cease any works in the immediate vicinity; - Visit the site and consult any potentially affected community to determine whether work can proceed without damage to the findings; - Determine and demarcate the exclusion boundary; - Site location and details to be added to the Project's GIS database for field confirmation by an archaeologist; - Inspect the site and confirm addition to the Project GIS; - Advise the NHC and request written permission to remove findings from the work area; and - Recover, package and label findings for transfer to the National Museum.
	Should human remains be found, the following actions must be followed: - Apply the chance find procedure as described above; - Schedule a field inspection with an archaeologist to confirm that the remains are human; - Advise and liaise with the NHC and Police; and - Remains will be recovered and removed to either the National Museum or the National Forensic Laboratory.

APPENDIX B – WEED AND SEED INSPECTION FORM

WEED AND SEED CLEARANCE CERTIFICATE

SECTION 1 – PROJECT MANAGER TO COMPLETE (AT LEAST 2 DAYS PRIORTO EQUIPMENT ARRIVING)

Project Manager or responsible person bringing equipment to site:

Name:		Department:	
Site:		Equipment Arrival Date:	

Details of the owner of the equipment:

Equipment owner:		Company Name:	
Equipment type:		Equipment ID:	
Date Equipment was washed:		Inspected By:	
Where was the equipment last used:			

SECTION 2 – PROJECT MANAGER TO COMPLETE PRIOR TO ANY GROUND WORKS COMMENCING

Inspection area	Requirements	Compliance		
		Yes	No	NA
Body works	Free of all soil and vegetation?			
Bumpers	Hollow sections and attachment points free of dirt			
Tyres	Free of all soil and vegetation			
Dual Wheels	Free of all soil and vegetation			
Canopy	Free of all soil and vegetation			
Radiator	Free of all soil and vegetation – specifically look for seed heads			
Interior	Free of soil and vegetation – specifically look for seed heads in upholstery and under mats			
Storage compartments	Free of all soil and vegetation			
Jack and tool kit	Check tool roll and spare wheel are clean			
Racks and bull bars	Free of all soil and vegetation			
Ropes/ Straps/ Cages	Free of all soil and vegetation? Carefully check Velcro and tensioning devices			
Tracks	Carefully check tracks are clean of soil and vegetation			

WEED AND SEED CLEARANCE CERTIFICATE

Actions required:	Accountability	Complete By:	Completed?

On inspection of the aforementioned equipment it has been found to be in a clean and weed seed free state, and has been approved for use on the Heja Lifestyle Estate Project.

Please ensure a copy of this certificate remains with the equipment for the operator while completing the site works.

SECTION 3 – BOTH PARTIES TO COMPLETE

Approval / Sign Off		Signature	Date
Project Manager: 	I certify that the equipment meets the company standards		
Project Manager or responsible person bringing equipment to site: 	I understand the condition applicable to this certificate and will ensure the equipment will arrive on site in the state in which it was inspected		
Operator/Company Rep: 	I certify that the equipment has been cleaned prior to being sent to site. The equipment will arrive on site as it was inspected or will arrive on site in a state that will meet the expectations of this permit.		

Records office use only:

(Please Tick)

(Please Tick)

Actions forward to Project Manager:		Copies of certificates forwarded to Project Manager:	
Certificate filed:		Signature	