



ECC

**ENVIRONMENTAL
COMPLIANCE CONSULTANCY**



ECC-62-181-REP-09-D

Environmental Management Plan

GONDWANA ETOSHA KING NEHALE LODGE

AMENDMENT REPORT

FEBRUARY 2020

PREPARED FOR



TITLE AND APPROVAL PAGE

| | |
|----------------------------|---|
| Project Name: | EMP amendment for the development of the Kameeldoring water hole hide for Gondwana Etosha King Nehale Lodge, Oshikoto Region, Namibia |
| ECC Reference: | ECC-62-181-REP-09-D |
| Client Name: | Gondwana Namibia (Pty) Ltd |
| Ministry Reference: | N/A |
| Status of Report: | Final |
| Date of issue: | February 2020 |
| Review Period | N/A |

Environmental Compliance Consultancy Contact Details:

We welcome any enquiries regarding this document and its content please contact:

Stephan Bezuidenhout

Environmental Consultant & Practitioner

Tel: +264 81 262 7872

Email: stephan@eccenvironmental.com

www.eccenvironmental.com

Jessica Mooney

Environmental Consultant & Practitioner

Tel: +264 81 653 1214

Email: jessica@eccenvironmental.com

www.eccenvironmental.com

Confidentiality

Environmental Compliance Consultancy Notice: This document is confidential. If you are not the intended recipient, you must not disclose or use the information contained in it. If you have received this document in error, please notify us immediately by return email and delete the document and any attachments. Any personal views or opinions expressed by the writer may not necessarily reflect the views or opinions of Environmental Compliance Consultancy.

Please note at ECC we care out lessening our footprint on the environment, therefore all documents are printed double-sided.

TABLE OF CONTENTS

| | | |
|--------|--|----|
| 1. | INTRODUCTION | 6 |
| 1.1. | PROJECT BACKGROUND | 6 |
| 1.1.1. | TECHNICAL DESIGN OF THE HIDE | 6 |
| 1.2. | ENVIRONMENTAL REGULATORY REQUIREMENTS..... | 9 |
| 1.3. | PURPOSE AND SCOPE OF THIS REPORT | 9 |
| 1.4. | MANAGEMENT OF THIS EMP AMENDMENT | 12 |
| 1.5. | LIMITATIONS, UNCERTAINTIES AND ASSUMPTIONS OF THIS EMP AMENDMENT | 12 |
| 1.6. | ENVIRONMENTAL CONSULTANCY..... | 12 |
| 2. | PROJECT MANAGEMENT AND PERSONNEL | 13 |
| 2.1. | ORGANISATIONAL STRUCTURE, ROLES AND RESPONSIBILITIES | 13 |
| 2.2. | CONTRACTORS..... | 14 |
| 2.3. | EMPLOYMENT | 14 |
| 3. | COMMUNICATIONS AND TRAINING | 15 |
| 3.1. | COMMUNICATIONS: PROPONENT TEAM | 15 |
| 3.2. | COMMUNICATIONS: COMMUNITY AND STAKEHOLDERS | 15 |
| 3.3. | COMPLAINTS HANDLING AND RECORDING | 15 |
| 3.4. | TRAINING AND AWARENESS | 15 |
| 4. | WORKING ARRANGEMENTS | 16 |
| 4.1. | WORKING HOURS..... | 16 |
| 4.2. | KAMEELDORING WATER HOLE HIDE AND ASSOCIATED INFRASTRUCTURE..... | 16 |
| 4.3. | JEEP TRACK ROAD | 16 |
| 4.4. | USE OF EXISTING ROADS | 16 |
| 5. | REPORTING, COMPLIANCE AND ENFORCEMENT | 17 |
| 6. | ENVIRONMENTAL PERFORMANCE AND MANAGEMENT | 17 |
| 6.1. | OBJECTIVES AND TARGETS | 17 |
| 6.2. | REGISTER OF ENVIRONMENTAL RISKS AND ISSUES..... | 17 |
| 6.3. | ENVIRONMENTAL EMERGENCY AND RESPONSE CONTACTS | 24 |
| 7. | IMPLEMENTATION OF THE EMP | 25 |
| | APPENDIX A: KAMEERDORING WATER HOLE HIDE DESIGN | 26 |
| | APPENDIX B: EVIDENCE OF MET – ENP CONSULTATION | 28 |
| | APPENDIX C: ECC’S CV..... | 32 |

LIST OF TABLES

| | |
|---|----|
| TABLE 1 – KEY ROLES AND RESPONSIBILITIES | 13 |
| TABLE 2 – CONSTRUCTION: ENVIRONMENTAL RISKS AND ISSUES, AND MITIGATION AND MONITORING MEASURES .. | 18 |
| TABLE 3 – OPERATION: ENVIRONMENTAL RISKS AND ISSUES, MITIGATION AND MONITORING MEASURES | 21 |
| TABLE 4– EMERGENCY SERVICES CONTACT TELEPHONE NUMBERS | 24 |

LIST OF FIGURES

| | |
|--|----|
| FIGURE 1 – PROPOSED LOCATION FOR THE HIDE AT KAMEELDORING WATER HOLE | 8 |
| FIGURE 2 – MUSHARA WATER HOLE WITH THREE PROPOSED ROAD BUFFER ZONES | 11 |

DEFINITIONS AND ABBREVIATIONS

| | |
|-------|--|
| APU | Anti-Poaching Unit |
| EIA | Environmental Impact Assessment |
| EAP | Environmental Assessment Practitioner |
| ECC | Environmental Compliance Consultancy |
| EMA | Environmental Management Act |
| ENP | Etosha National Park |
| EMP | Environmental and Social Management Plan |
| I&APs | Interested and affected parties |
| MET | Ministry of Environment and Tourism |

1. INTRODUCTION

1.1. PROJECT BACKGROUND

Gondwana Collection Namibia Pty Ltd (herein referred to as the proponent) is in the process of finalising the constructions and development of the Gondwana Etosha King Nehale Lodge within the King Nehale Conservancy in the Oshikoto Region (Figure 1). The development is an up-market forty (40) rooms accommodation with a 4-5-star rating lodge, which will expose tourists to the cultural experience in north-central Namibia. As such, the development has significant tourism potential and which will generate income for the local conservancy and greater Namibian community.

The proponent has a valid and approved environmental clearance certificate which was approved for the development of the Gondwana Etosha King Nehale Lodge, Oshikoto Region. The proponent seeks to amend the existing Environmental Management Plan's (EMP) and thus the conditions of the environmental clearance certificate as stipulated within the Environmental Management Act, No.7 of 2007 amendment section 39.

The proposed EMP amendment refers to the establishment of the Kameeldoring water hole hide (herein referred to as the hide) within the proponents' concession (Figure 1). The proposed hide establishment and development will expose tourists with closer to wildlife experience and thus a conducive environment for photographic tourism. The construction phase and operational activities are expected to commence early 2020, inclusive of the hide.

1.1.1. TECHNICAL DESIGN OF THE HIDE

The design of the proposed hide will be as follows and is displayed in Appendix A:

- Three standard containers welded together, with the total dimensions of 3 meters wide by 18 meters long by 3 meters tall, placed on top of a frame on stilts and raised 1 meter off the ground.
 - o It will be considered whether to cover the bottom or not taking into account animals accessing under the structure for shade.
- The hide will have a secure closed entry area for guests to disembark the tour vehicle, a wheelchair access ramp will also be provided.
- There will be an onsite ablution, with a 900 liters Ballam sewage septic tank.
- A maximum of 300 liters per day water will be required to flush the toilet and wash hands.
 - o Water will be pumped from the borehole at the water hole.
 - o As per the Promulgation of Water Resources Management Act, 2013 (Act No. 11 of 2013) section 38, the purpose for abstraction and water use fall under the domestic use, which state that:
 - A person who abstracts water from a water resource for own domestic use is exempted from the requirement for a licence to abstract and use water.
 - Additionally, the water quantity required is within the limit, thus no licence required to abstract and use water.
 - Shall the purpose of water use and quantities change in future, the proponent shall apply for the licence to abstract and use water.
 - Precautionary principles should be applied at all times, specifically to ensure sustainable utilization of water resources.
- Provisions for heat relief as well as ventilation will be made with the outside cladding with insulation panels and wooden poles.
- Parking for 3 vehicles will be completely closed with wooden poles of 2.5 meters high and a steel gate on a track.

- If required, bags filled with sand will be packed around the water hole to restrict water closer to the hide during rainfall.

This report describes only the potential environmental impact of the additional hide construction and associated infrastructure. Wherever possible, this report has remained consistent with the original EMP to avoid ambiguity with regard to environmental matters.

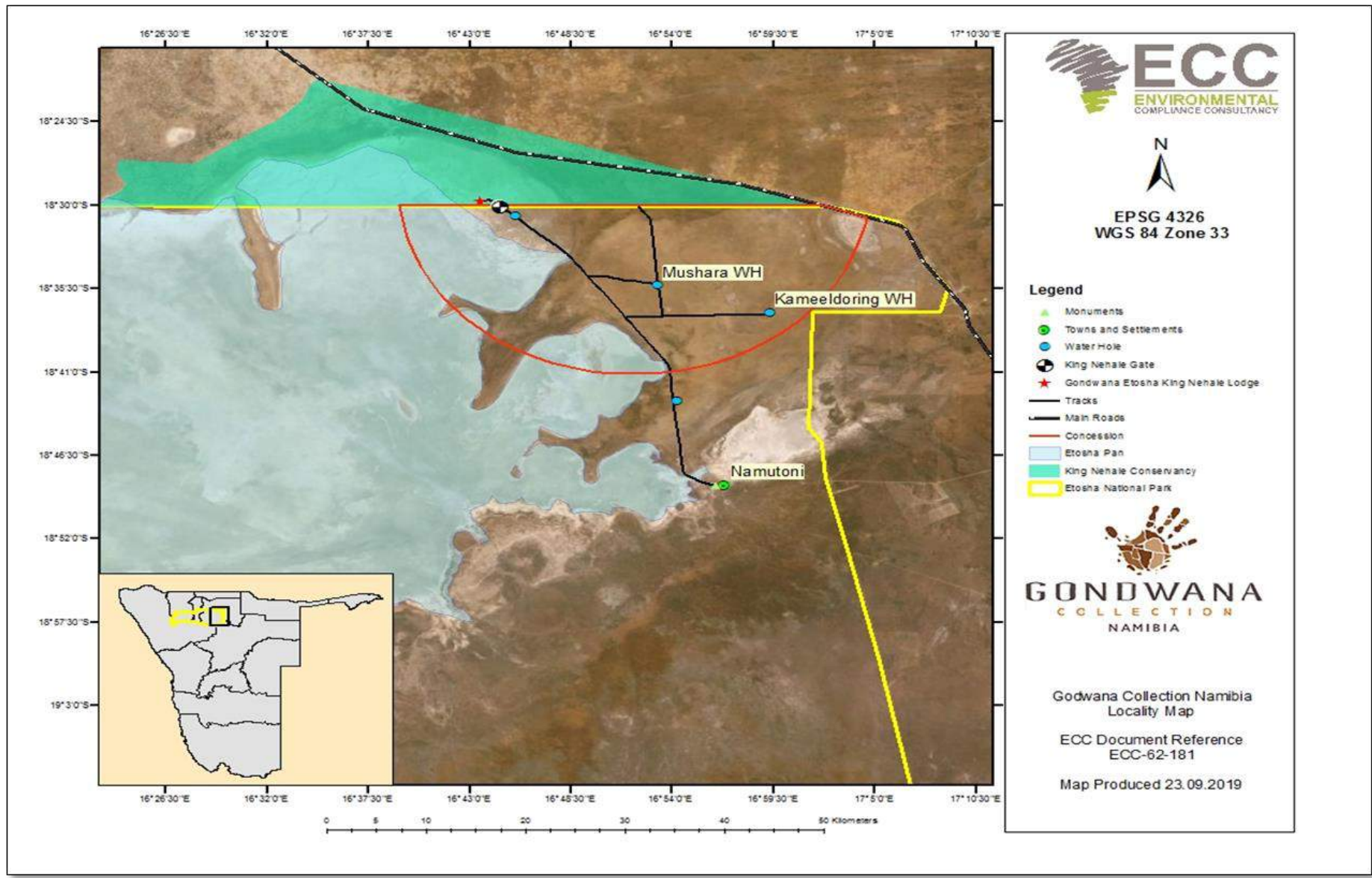


FIGURE 1 – PROPOSED LOCATION FOR THE HIDE AT KAMEELDORING WATER HOLE

1.2. ENVIRONMENTAL REGULATORY REQUIREMENTS

The EMP amendment has been identified due to changes in the original project magnitude and extent, specifically that the proponent proposed to build a hide at the Kameeldoring water hole and construct a jeep track road through Mushara Water Hole for about 10 km, which were not included in the approved environmental clearance certificate.

As such, an amendment to the environmental clearance certificate is required. For this purpose, an EMP amendment is required as part of the environmental clearance certificate application amendment, in order to support the decision-making process. This report presents the EMP amendment for the proposed hide and has been undertaken in accordance with the requirements of the Environmental Management Act, No. 7 of 2007 and associated Regulations.

1.3. PURPOSE AND SCOPE OF THIS REPORT

The purpose of this EMP amendment is to provide a management framework for the planning and implementation of construction and operation activities for the proposed hide. These will allow potential environmental impacts to be avoided, mitigated, prevented and minimised as far as reasonably practicable, and that statutory requirements and other legal obligations are fulfilled. This EMP amendment also presents protocols and procedures, and roles and responsibilities to ensure the management arrangements are appropriately and effectively implemented.

This EMP amendment will be part of the appendices to the existing environmental scoping report and the original EMP. Subsequently, this EMP amendment has been conducted based on the findings of the assessment of the existing and approved environmental scoping report and the original EMP, which should be referred to for further information on the project assessment methodology, applicable legislation and assessment findings.

This EMP amendment is a live document and shall be reviewed at predetermined intervals, and/or updated when the scope of works alters, or when further data and information can be added. All personnel working on the project will be legally required to comply with the standards set out in this EMP amendment.

The scope of this EMP amendment includes the duration of the project life: fabrication, construction, operation and decommissioning. The proponent shall be responsible for each phase of the project and the implementation of this EMP. The Directorate of Parks & Wildlife Management, Mr Evaristo Nghilai was consulted on the 24th January 2020 and there was no objection to the proposed project (Appendix B). The current understanding of each phase is as follows:

– Fabrication

This phase involves the creation of metal structures by cutting, bending and assembling processes of the containers and other materials for the hide. Fabrication will commence early 2020 and will occur outside of the ENP in order to minimise the impacts on wildlife.

– Construction

Construction will commence early 2020 and it is estimated to last for one week. Construction will include the establishment and development of the hide and the jeep track road. The proposed jeep track road will be approximately 10 km long, constructed past Mushara Water Hole, but within the 100 – 200 meters buffer from the water hole centroid (Figure 2), in order to maximise the benefits from eco-tourism activities with minimal wildlife disturbance. It will be constructed with wooden chip and/or other environmentally friendly material to suppress dust.

- A jeep track road will be clearly demarcated on the map and shall ensure that potential impacts of the environment are mitigated, in particular, wildlife disturbance, vegetation removal and soil compaction as practical as possible.
- All construction materials shall be sourced outside the ENP as practically as possible. Where required, permission from MET and/or other competent authorities (if required) should be obtained before sourcing water, sand and wooden material inside the ENP.

- **Operations**

Once operational, the proponent shall maintain the hide and its associated infrastructure on a regular basis. Game drives shall be conducted in the morning after sunrise and afternoon before sunset.

- **Decommissioning**

Shall the proposed hide cease, the hide and associated infrastructure shall be handed over to the competent authority for eco-tourism and/or research activities or any other purpose identified. A series of before and after photographs of the development shall be presented by the proponent.

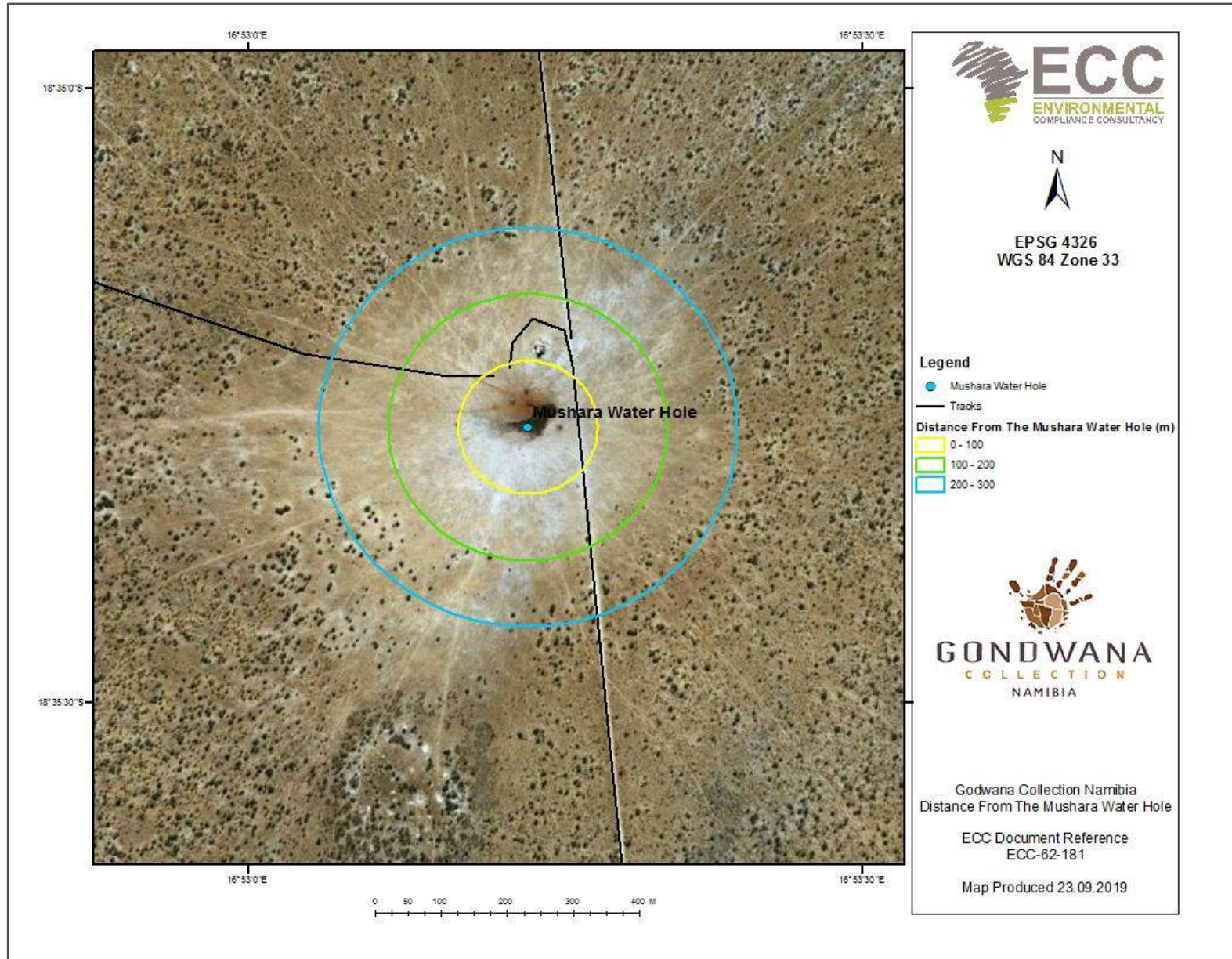


FIGURE 2 – MUSHARA WATER HOLE WITH THREE PROPOSED ROAD BUFFER ZONES

1.4. MANAGEMENT OF THIS EMP AMENDMENT

The implementation and management of this EMP amendment, as well as the monitoring of compliance, shall be undertaken through daily duties and monthly inspections.

This EMP amendment shall be circulated to all contractors and shall be made available on the Environmental Compliance Consultancy's website.

1.5. LIMITATIONS, UNCERTAINTIES AND ASSUMPTIONS OF THIS EMP AMENDMENT

This EMP amendment does not include measures for compliance with statutory occupational health and safety requirements.

Where there is any conflict between the provisions of this EMP amendment 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 and statutory requirements are to take precedence.

The information contained in this EMP has been based on the project description as provided in the environmental scoping report and existing EMP. Where the proposed EMP amendment design or construction methods alter, this document may require updating and potential further assessment undertaken.

1.6. ENVIRONMENTAL CONSULTANCY

Environmental Compliance Consultancy (ECC), a Namibian consultancy registration number 2013/11401, has prepared this EMP amendment on behalf of the proponent. ECC operates exclusively in the environmental, social, health and safety fields for clients across Southern Africa, in the public and private sector. ECC is independent of the proponent and has no vested or financial interest in the proposed project, except for fair remuneration for professional services rendered.

All compliance and regulatory requirements regarding this document should be forwarded by email or posted to the following address:

Environmental Compliance Consultancy

PO BOX 91193

Klein Windhoek, Namibia

Tel: +264 81 669 7608

Email: info@eccenvironmental.com

2. PROJECT MANAGEMENT AND PERSONNEL

2.1. ORGANISATIONAL STRUCTURE, ROLES AND RESPONSIBILITIES

The proponent shall be responsible for:

- Ensuring all members of the Project Team, including contractors and sub-contractors, comply with the procedures set out in this EMP amendment.
- Ensuring that all persons are provided with sufficient and appropriate training, supervision and clear instruction to fulfil this requirement, and
- Ensuring that any persons allocated specific environmental responsibilities are notified of their appointment and confirm that their responsibilities are clearly understood.

Contractors shall be responsible for ensuring and demonstrating that all personnel employed by them are compliant with this amendment, and meet the responsibilities listed above.

The key personnel and environmental responsibilities of each role are presented in Table 1.

TABLE 1 – KEY ROLES AND RESPONSIBILITIES

| ROLE | RESPONSIBILITY & DUTIES |
|--------------------------------------|---|
| Proponent | <ul style="list-style-type: none"> - Overall responsibility for the implementation and management of this EMP. - Ensure environmental law and policy that are associated with the project are communicated to all personnel throughout the proposed project. - Responsible for providing the required resources (including financial and technical) to complete the required tasks. |
| Project Manager | <p>Responsible for ensuring compliance with this EMP including overseeing the fabrication and construction works, day to day activities during operations, and routine and non-routine maintenance works during operations, as well as the decommissioning of the development.</p> <ul style="list-style-type: none"> - Ensuring all personnel are aware of the commitments made in this EMP and any other relevant regulatory requirements applicable to the project are adhered to; - Responsible for the management, maintenance and revisions of this EMP; - Ensuring adequate resources are made available for implementation of this EMP; - Maintain the community issues and concern register, and keep records of complaints. - Ensuring all employees and contractors participate in a Site Induction process prior to commencing work on the project; - Maintain up to date register of employees who have completed the Site Induction; and - Provisioning of environmental awareness/management training and inductions for all employees; - Ensuring that best environmental practice is undertaken throughout the duration of the project; - Report any non-compliance or accidents to the Regulatory Authority. |
| Site Manager/ Contractors | <p>Appointed to manage the performance of the construction and operational maintenance activities. Responsible for the implementation of this EMP and ensuring all activities are compliant with this EMP, as well as:</p> <ul style="list-style-type: none"> - Managing the preparation and implementation of method statements and risk assessments for certain activities: <ul style="list-style-type: none"> o Ensuring the Environment Manager reviews all method statements and risk assessment and |

| ROLE | RESPONSIBILITY & DUTIES |
|---|---|
| | <ul style="list-style-type: none"> ○ Relevant environmental protocols are incorporated; – Reporting any non-compliance or accidents to the Project Manager and Environment Manager; – Ensuring that all staff (including game drivers during operation) have attended a site induction session before the commencement of any work on-site and that they are adequately informed of the requirements of this EMP; – Ensuring that all contract workers, sub-contractors and visitors to the site are conversant with the requirements of this EMP, relevant to their roles on site and adhere to this EMP at all times; and – Receiving, responding to and recording complaints. |
| Employees / Contractor employees | Responsible for being compliant with this EMP throughout the project life cycle, in addition to: <ul style="list-style-type: none"> – Ensuring they have undertaken a site induction and are conversant with the requirements of this EMP; – Ensuring appropriate briefings for certain activities have been provided, fully understood, including potential risks, if there is any; – Adherence to this EMP at all times; – Reporting of any operations and conditions that deviate from the EMP or any non-compliant issues or accidents to the Environment Manager, and Site Manager/Contractor. |
| Lodge Manager | Responsible for ensuring compliance with this EMP throughout the operational phase, in addition to: <ul style="list-style-type: none"> – Ensuring employees understand and comply with the requirements of this EMP; – Ensuring appropriate briefings and training for certain activities has been provided; – Ensuring and maintaining general housekeeping. |

2.2. CONTRACTORS

Any contractors hired during the construction works or maintenance activities during the operational phase shall be compliant with this EMP, and shall be responsible for the following:

- Undertaking activities in accordance with this EMP as well as compliant with relevant laws, policies, procedures, management plans, statutory requirements, and contract requirements
- Implementing appropriate environmental and safety management measures
- Reporting of environmental issues, including actual or potential environmental incidents and hazards, to the Site Manager and/or Project Manager, and
- Ensuring appropriate corrective or remedial action is taken to address all environmental hazards and incidents reported by employees and subcontractors.

2.3. EMPLOYMENT

All employment conditions including for all the contractors shall comply with the requirements of the Republic of Namibia Regulations for Labour, Health and Safety, and any amendments to these regulations as set out in the approved EMP. A list of all staff employed during construction and operations is shared with but not limited to:

- The Deputy Director of ENP
- MET Intelligence and Investigation Unit (IIU)
- Anti-Poaching Unit (APU)
- King Nehale Conservancy

- Any changes to this list are shared within 72 hours. This list should include names, addresses, cell numbers and copies of identity documents.

3. COMMUNICATIONS AND TRAINING

3.1. COMMUNICATIONS: PROPONENT TEAM

In order to ensure efficient and effective communication strategies throughout the project life cycle, the Project Manager and Site Manager shall communicate the hide environmental, safety and security issues to the Project Team through the following means (as and when required):

- Site induction;
- Audits and site inspections;
- Toolbox talks, including instruction on incident response procedures; and
- Key project-specific environmental, safety and security issues briefings.

This EMP amendment shall be distributed to the construction Project Team, including contractors, to ensure that the environmental requirements are communicated effectively. Key activities and environmentally sensitive operations shall also be briefed to workers and contractors.

During the construction phase, estimated to last one week, regular communications between the management team shall include discussing any complaints received and actions to resolve them; any inspections, audits or non-conformance with this EMP amendment; and any objectives or target achievements. Throughout the project life cycle, a top-down and bottom-up communication system shall be implemented to ensure that potential environmental impacts are identified, avoided and mitigated as much as practically possible. Once the proposed development is in full operation, a safety and security plan shall be in place and implemented.

3.2. COMMUNICATIONS: COMMUNITY AND STAKEHOLDERS

The proponent should ensure proper and effective communication with such as MET-IIU, APU, King Nehale Conservancy, local and traditional authority.

3.3. COMPLAINTS HANDLING AND RECORDING

All complaints related to the hide and its associated infrastructure received verbally by any person shall be recorded by the receiver in a complainant register as set out in the original EMP.

3.4. TRAINING AND AWARENESS

All personnel working on the hide and its associated infrastructure shall be competent to perform tasks that have the potential to cause an environmental impact. All training and awareness component for the amendment will be conducted in accordance with the original EMP.

4. WORKING ARRANGEMENTS

4.1. WORKING HOURS

All work that will be conducted inside the ENP should be restricted to working between the hours of 06h30 – 18h30 during summer and 07h00 – 17h30 during winter, Monday to Saturday.

Any variations to the above must be reviewed and approved in advance by the Project Manager, Site Manager, MET and APU. Such variations must comply with the Labour Act and any other relevant legislation.

4.2. KAMEELDORING WATER HOLE HIDE AND ASSOCIATED INFRASTRUCTURE

The hide will be located in the Kameeldoring water hole inside ENP (Figure 1). All the contractors will not be permitted to establish a campsite or overnight at undesignated camping sites inside ENP. It is the contractor's responsibility to communicate with all identified Interest and Affected Parties (I&APs) timely (especially, MET, & APU), before commencing with the construction and operations.

4.3. JEEP TRACK ROAD

If required, a jeep track road shall be created past Mushara water hole, which will be utilised for eco-tourism purpose. The proposed jeep track road shall be within the 100 m – 200 m buffer closer to the Mushara water hole as indicated in Figure 2. The jeep track road shall be clearly indicated on the map which shall be shared with MET.

4.4. USE OF EXISTING ROADS

Only permitted access roads within the concession shall be used for eco-tourism purpose. Permission should request from MET (who will inform the other stakeholders such as the APU) on time if any other roads will be used.

5. REPORTING, COMPLIANCE AND ENFORCEMENT

All environmental performance management, reporting, enforcement, compliance and non-compliance matters regarding the hide will be conducted in accordance with the original EMP.

6. ENVIRONMENTAL PERFORMANCE AND MANAGEMENT

6.1. OBJECTIVES AND TARGETS

Environmental objectives for the EMP amendment are as follows:

- Zero pollution incidents;
- Minimise noise pollution;
- No waste shall be kept at the Kameeldoring water hole hide for more than 24 hours;
- The national strategy on waste management in protected areas should apply;
- Protect local flora and fauna;
- No overnighting at the hide or lighting without prior approval to MET-ENP and/or other stakeholders;
- Zero poaching, and;
- Use natural resources effectively and efficiently.

6.2. REGISTER OF ENVIRONMENTAL RISKS AND ISSUES

An environmental review of the proposed amendment has been completed to identify all the commitments and agreements made within the environmental scoping report and its associated EMP. From this, a schedule of environmental commitments and risks has been produced (Tables 2 and 3), which details deliverables including measures identified for the prevention of potential environmental risks and issues during the construction and operational phase.

TABLE 2 – CONSTRUCTION: ENVIRONMENTAL RISKS AND ISSUES, AND MITIGATION AND MONITORING MEASURES

| ASPECT | POTENTIAL IMPACTS | MANAGEMENT/MITIGATION MEASURES | MONITORING REQUIREMENTS | RESPONSIBILITY |
|-------------|--|--|---|---|
| Soil | <ul style="list-style-type: none"> - Soil pollution - Soil erosion - Loss of topsoil - Sand removal - Sandy and muddy roads | <ul style="list-style-type: none"> - A 'good housekeeping' policy shall be adopted across the construction and maintenance working areas - Refuelling shall be undertaken outside ENP - Under no circumstances should substances be disposed of inside ENP - Ensure minimal vegetation clearance and exposure of soils through selecting the shortest route for access track construction and incorporating design elements which reduce the need for vegetation clearance - In areas where the risk of erosion is evident, measures may be necessary to prevent erosion - Minimise the disturbance and removal of topsoil - If sand is required, it should be extracted from an existing permitted borrow pit - Ensure four-wheel off-road driving training especially for the game drivers, and - Strictly no off-road driving. | <ul style="list-style-type: none"> - Daily visual inspection of operations | <ul style="list-style-type: none"> - Project Manager |
| Air quality | <ul style="list-style-type: none"> - Dust emissions | <ul style="list-style-type: none"> - Use existing access roads and tracks - Restricted speeds (<30km/hr) - Implement dust suppression techniques as practical as possible | <ul style="list-style-type: none"> - Maintenance to be carried out as required - Daily observations | <ul style="list-style-type: none"> - Project Manager - Site Manager |

| ASPECT | POTENTIAL IMPACTS | MANAGEMENT/MITIGATION MEASURES | MONITORING REQUIREMENTS | RESPONSIBILITY |
|-----------------------------------|--|--|---|--|
| Biodiversity - Flora and fauna | <ul style="list-style-type: none"> - Impact on vegetation - Impact on fauna activity - Poaching | <ul style="list-style-type: none"> - Obtain permits for vegetation removal (if required) from the Directorate of Forestry - Use existing tracks where possible - Obtain an agreement and/permit for creating new tracks from MET and other relevant authority, if required - Apply speed restrictions (<30km/hr) - Avoid off-road driving - Apply or design principles to avoid wildlife disturbance/interactions - Fabricate the hide and associated infrastructure to blend in with the background natural environment as practically as possible - A list of all staff employed during construction and operations is shared with the Deputy Director of ENP and MET's Intelligence and the Investigation Unit (IIU) as well as the Anti-Poaching Unit. - Any changes to this list are shared within 48 hours - This list should include names, addresses, cell numbers and copies of employee ID's - A vetting process should be undertaken, with special attention given to the tour guides to ensure well trained and reliable guides are elected to work at the establishment - Regular awareness training must be conducted for all staff. This training should not be confined to the "can not do" activities but also the reasons for and impacts of such activities - Strict rules should be implemented that no sharing of rhino sittings may be shared via verbal exchanges, geographical tagging of photographs or any other means - An agreed security plan must be in place which is to be shared with the Deputy Director of ENP and MET's Intelligence and the Investigation Unit - No driving inside the ENP after sunset or before sunrise | <ul style="list-style-type: none"> - Daily observations | <ul style="list-style-type: none"> - Project Manager - Site Manager - Employees |
| Waste management | <ul style="list-style-type: none"> - Visual impacts - Waste pollution | <ul style="list-style-type: none"> - The national strategy on waste management in protected areas should apply - Training and Toolbox Talks - Good housekeeping at the hide and its associated infrastructure | <ul style="list-style-type: none"> - Daily observations - Weekly checks | <ul style="list-style-type: none"> - Project Manager - Employees |

| ASPECT | POTENTIAL IMPACTS | MANAGEMENT/MITIGATION MEASURES | MONITORING REQUIREMENTS | RESPONSIBILITY |
|---------------------------|---|---|---|--|
| | | <ul style="list-style-type: none"> - No waste materials should be kept at the hide for more than 24 hours - Littering by the construction workers shall not be allowed, and - Ablution facilities shall be maintained regularly - No plastic bags shall enter the ENP unless: <ul style="list-style-type: none"> o Designated to be used for the disposal of waste; o Designated for agricultural purposes; o Used for sampling or analysis; o That constitutes or form an integral part of, the packaging in which goods are sealed prior to the sale in the local market or for export; or o That it is a transparent resealable bag. | | |
| Noise | <ul style="list-style-type: none"> - Disturbance to wildlife | <ul style="list-style-type: none"> - Noise should be minimised as much as possible during construction works of the hide and the jeep track - Measures, as set out in the approved EMP, shall be applied - Conduct fabrication off-site (outside the ENP) where possible/ practical to eliminate noise on site | <ul style="list-style-type: none"> - Daily observations | <ul style="list-style-type: none"> - Project Manager - Employees |
| Light | <ul style="list-style-type: none"> - Light pollution from vehicles | <ul style="list-style-type: none"> - Light suppression techniques must be implemented and approved by MET-ENP, if applicable - No driving inside the ENP after sunset or before sunrise | <ul style="list-style-type: none"> - Daily observations | <ul style="list-style-type: none"> - Project Manager |
| Social, health and safety | <ul style="list-style-type: none"> - Employment creation - Skill development - Accidents/incidents | <ul style="list-style-type: none"> - Maximise local employment and business opportunities to promote and improve the local economy - Enhance the use of local labour and local skills as far as reasonably possible - Where the required skills do not occur locally, and where appropriate and applicable, ensure that relevant local individuals are trained - Ensure that goods and services are sourced from the local and regional economy as far as reasonably possible - Educate/inform employees on health and safety issues - Any accidents or incidents should immediately be reported to the Project Manager. <ul style="list-style-type: none"> o All incidents should be recorded in an incident register. - Ensure first aid training and environmental awareness. | <ul style="list-style-type: none"> - Daily observations - Weekly, monthly and annually checks | <ul style="list-style-type: none"> - Project Manager |

| ASPECT | POTENTIAL IMPACTS | MANAGEMENT/MITIGATION MEASURES | MONITORING REQUIREMENTS | RESPONSIBILITY |
|----------|--|---|--|---|
| Heritage | <ul style="list-style-type: none"> - Disruption of heritage sites | <p>Discovery of unearthed archaeological remains to be uncovered, the following measures (chance find procedure) shall be applied:</p> <ul style="list-style-type: none"> - Works to cease, area to be demarcated with appropriate tape by the site supervisor, and the Site Manager to be informed - Site Manager to visit the site and determine whether work can proceed without damage to findings, mark exclusions boundary and inform the Environment and Social Manager with the GPS position if possible - If works cannot proceed without damage to findings, Site Manager to inform the Environmental Manager who will get in touch with an archaeologist who will provide advice - Environment and Social Manager / Archaeological Specialist to evaluate the significance of the remains and identify appropriate action, for example, record and remove; relocate or leave in situ (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, if required, and recover and remove the remains to the National Museum or National Forensic Laboratory as direct. | <ul style="list-style-type: none"> - Daily inspection | <ul style="list-style-type: none"> - Project Manager |

TABLE 3 – OPERATION: ENVIRONMENTAL RISKS AND ISSUES, MITIGATION AND MONITORING MEASURES

| ASPECT | POTENTIAL IMPACTS | MANAGEMENT/MITIGATION MEASURES | MONITORING REQUIREMENTS | RESPONSIBILITY |
|------------------|---|---|--|--|
| Water management | <ul style="list-style-type: none"> - Water-saving - Groundwater pollution and general pollution | <ul style="list-style-type: none"> - Use water-saving devices where practical - Limit water wastage - Water storage tanks should be properly maintained - Sewage water must be adequately managed - Training and Toolbox Talks. - Good housekeeping across the site. - All working areas shall apply good house-keeping. | <ul style="list-style-type: none"> - Daily inspection of operations - Weekly inspections | <ul style="list-style-type: none"> - Lodge Manager - Employees |

| ASPECT | POTENTIAL IMPACTS | MANAGEMENT/MITIGATION MEASURES | MONITORING REQUIREMENTS | RESPONSIBILITY |
|---------------------------|--|--|---|---|
| | | <ul style="list-style-type: none"> - Implement the waste management hierarchy across the site: Avoid, reuse, recycle, then disposal through burning or dump. - No waste shall be stored onsite - It is unlikely that hazardous material and wastes will be produced, however in the event that they do, they shall be managed in a safe and responsible manner so as to prevent contamination of soils, pollution of water and/or harm to people or animals as a result of the use of these materials. Hazardous and non-hazardous waste shall be stored separately at all times. | | |
| Fauna | <ul style="list-style-type: none"> - Wildlife interactions/disturbance | <ul style="list-style-type: none"> - Have standard procedures in place to deal with wildlife siting along the game drive and at water hole hide. E.g. Logbook. <ul style="list-style-type: none"> o This shall include voluntarily game count by tourist along the drive and at the water holes, as part of citizen science which will contribute to long-term faunal monitoring for the ENP. | <ul style="list-style-type: none"> - Daily to monthly and/or seasonal observations - Quarterly observations | <ul style="list-style-type: none"> - Lodge manager - Employees |
| Noise | <ul style="list-style-type: none"> - Disturbance to wildlife | <ul style="list-style-type: none"> - Noise restrictions must be in place at water holes and along the game drive, and - Game drives and self-drives in the must be conducted between dusk and dawn | <ul style="list-style-type: none"> - Daily observations | <ul style="list-style-type: none"> - Lodge Manager - Employees |
| Light | <ul style="list-style-type: none"> - Disturbance to wildlife | <ul style="list-style-type: none"> - No driving in the ENP after sunset and before sunrise. | <ul style="list-style-type: none"> - Daily observations | <ul style="list-style-type: none"> - Lodge manager - Employees |
| Social, health and safety | <ul style="list-style-type: none"> - Job creation - Capacity build development - Accidents/ incidents | <ul style="list-style-type: none"> - Maximise local employment and business opportunities to promote and improve the local economy. - Enhance the use of local labour and skills as far as reasonably possible. Where the required skills do not occur locally, and where appropriate and | <ul style="list-style-type: none"> - Quarterly observations - Daily inspection | <ul style="list-style-type: none"> - Project Manager - Lodge Manager - Employees |

| ASPECT | POTENTIAL IMPACTS | MANAGEMENT/MITIGATION MEASURES | MONITORING REQUIREMENTS | RESPONSIBILITY |
|--------|-------------------|---|-------------------------|----------------|
| | | <p>applicable, ensure that relevant local individuals are trained, and</p> <ul style="list-style-type: none"> - Ensure that goods and services are sourced from the local and regional economy as far as reasonably possible. - Engage and/or involve local school and/or regional into the lodge activities such game drive as part of environmental education benefit. - Ensure first aid training and environmental awareness. - Speed limits must be in place inside and outside the ENP, due to the occurrence of wild animals - Any accident/incident should be reported to MET and other relevant authority within 24 hours | | |

6.3. ENVIRONMENTAL EMERGENCY AND RESPONSE CONTACTS

The Project Manager will be the primary contact person in the event of an environmental emergency. The Project Manager has the authority and independence to request reasonable steps be taken to avoid or minimise unintended or adverse environmental impacts and failing the effectiveness of such steps, to direct that relevant actions be ceased immediately should an adverse environmental impact be anticipated.

In the event of an incident that requires the emergency services, the services that should be contacted are listed in Table 4.

TABLE 4– EMERGENCY SERVICES CONTACT TELEPHONE NUMBERS

| AMBULANCE (Ondangwa) | POLICE (Omuthiya) | MET (ENP-Okaukuejo) | Intelligence Support Against Poaching | FIRE BRIGADE (Tsumeb) | CLINIC (Omuthiya) |
|-------------------------|----------------------|------------------------|--|--------------------------|----------------------|
| +264 (65) 24-0111 | +264 (65) 241066 | +264 (67) 229854 | +264 81 169 4715 | +264 (67) 22- 1004 | +264-65 244 300 |

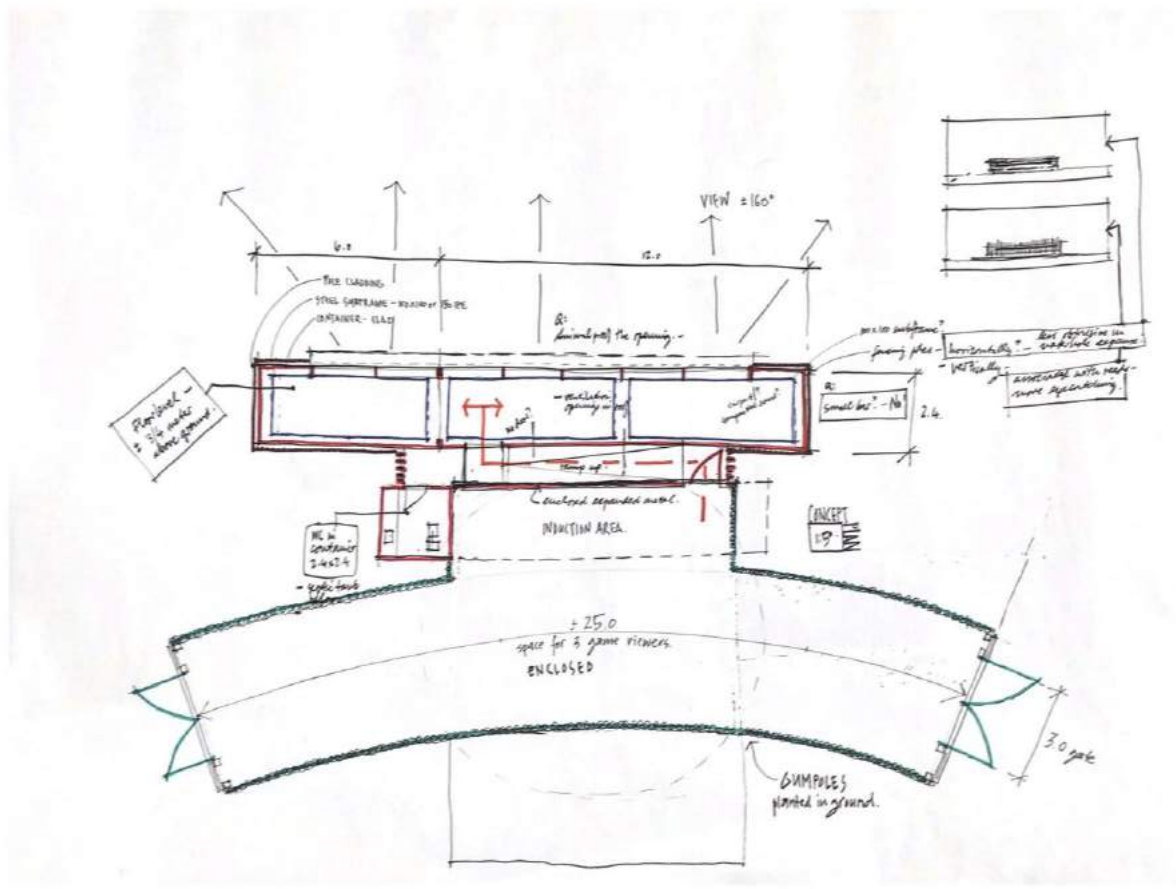
NB: All environmental incidents, regardless of their size or significance, should be recorded and reported to either the Project or Site Manager.

7. IMPLEMENTATION OF THE EMP

This EMP amendment:

- A. Has been prepared pursuant to a contract with the proponent;
- B. Has been prepared on the basis of information provided to ECC up to January 2020;
- C. Is for the sole use of the proponent, for the sole purpose of an EMP;
- D. Must not be used (1) by any person other than the proponent or (2) for a purpose other than an EMP; and
- E. Must not be copied without the prior written permission of ECC.

ECC has prepared the EMP amendment on the basis of information provided by the proponent, specialist reports, original EMP and the environmental scoping report (Appendix C)



APPENDIX B: EVIDENCE OF MET – ENP CONSULTATION



Titus <titus@eccenvironmental.com>

2/13/2020 1:47 PM



To: evaristo nghilai Cc: Stephan Bezuidenhout; Quintin Hartung | Gondwana Collection Namibia; Jess... 

Dear Evaristo,

Many thanks for the feedback.

All have been noted and will be updated as suggested.

Regards,
Titus

--

Titus Shuuya

Environmental Compliance Consultancy (ECC)

Position: Senior Scientist Environmental Practitioner & Consultant

Mobile: +264 85 301 3777

Office Tel: +264 81 669 7608

Postal: PO BOX 91193 | Klein Windhoek | Namibia

Address: 1 Jan Jonker St | Wasserberg Park | Klein Windhoek | Namibia

Email: titus@eccenvironmental.com

Website: www.eccenvironmental.com



evaristo nghilai <evaristo.nghilai@met.gov.na>

2/13/2020 12:21 PM



To: Titus Cc: Stephan Bezuidenhout; Quintin Hartung | Gondwana Collection Namibia; Jessica Mooney

Dear Titus

With regards to Waste management, the National Strategy on Waste management in Protected Areas should apply.

First of all my apologies for replying very late.

Mr Simataa and myself read through the document and have no objection to it.

Under section 6.3 please take note that the Police HQ for Oshikoto Region is in Omuthiya

The closest fire brigade could be sourced from Tsumed about 100km compered to Oshakati.

There are clinics at Oshivelo and Omuthiya.

**Titus <titus@eccenvironmental.com>**

1/24/2020 9:57 AM



To: evaristo.nghilai@met.gov.na Cc: Stephan Bezuidenhout; Quintin Hartung | Gondwana Collection ...

ECC-62-181-REP-EMP...
1.81 MB

Dear Mr. Evaristo,

Thank you for your time during our telephone conversation on the 13th January 2020.

As you are aware, Gondwana King Nehale Lodge proposed to build a Hide at Kameeldoring waterhole and its associated infrastructure.

Environmental Compliance Consultancy (ECC) has been appointed by Gondwana to write the Environmental Management Plan (EMP) amendment report for the proposed Hide at Kameeldoring waterhole and its associated infrastructure. MET-Etoshia National Park (ENP) has been identified as a key stakeholder to be consulted for inputs and recommendation for the proposed Hide.

It is against this background, we are kindly requesting inputs and/or recommendations from you and/or other MET officials for the propose Hide and its associated infrastructure.

Please see attached EMP amendment report for details. I have also send you the Hide Technical Design via WeTransfer.

Once, you have reviewed the document, please do let us know so that we can further discuss any matter (if there is any) over the phone. We will follow up with you on the 7th February 2020, if we do not received feedback.

We are awaiting your response and acknowledgement.

Should you have any queries, please do not hesitate to contact us.

Many thanks,

Kind regards,
Titus

--

Titus Shuuya

Environmental Compliance Consultancy (ECC)

Position: Senior Scientist Environmental Practitioner & Consultant

Mobile: +264 85 301 3777

Office Tel: +264 81 669 7608

Postal: PO BOX 91193 | Klein Windhoek | Namibia

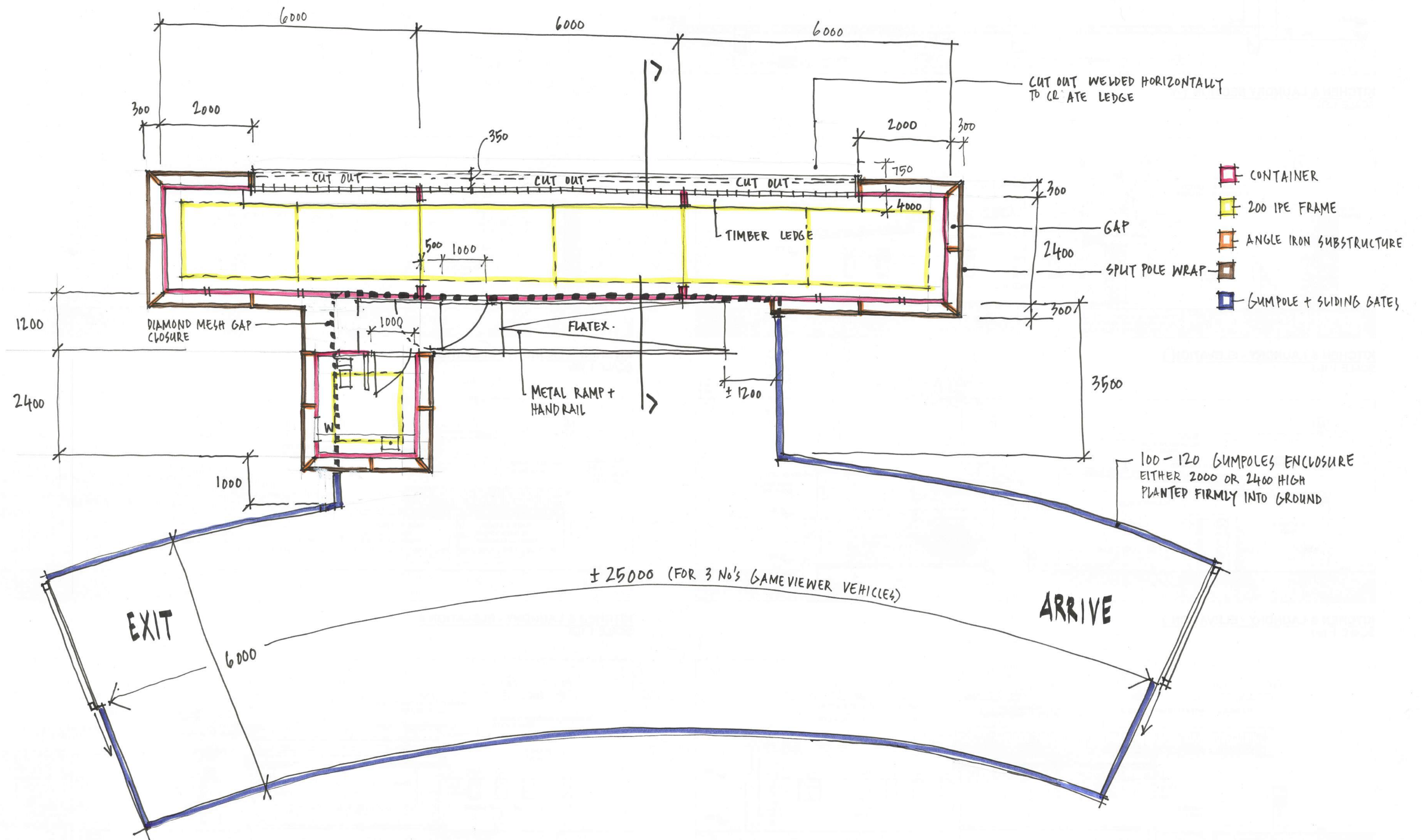
Address: 1 Jan Jonker St | Wasserberg Park | Klein Windhoek | Namibia

Email: titus@eccenvironmental.com

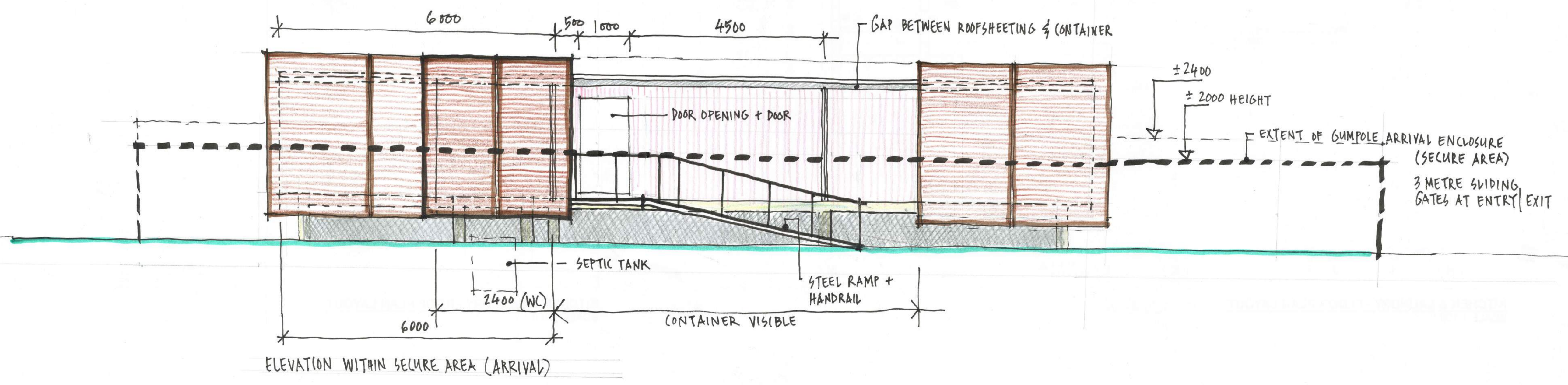
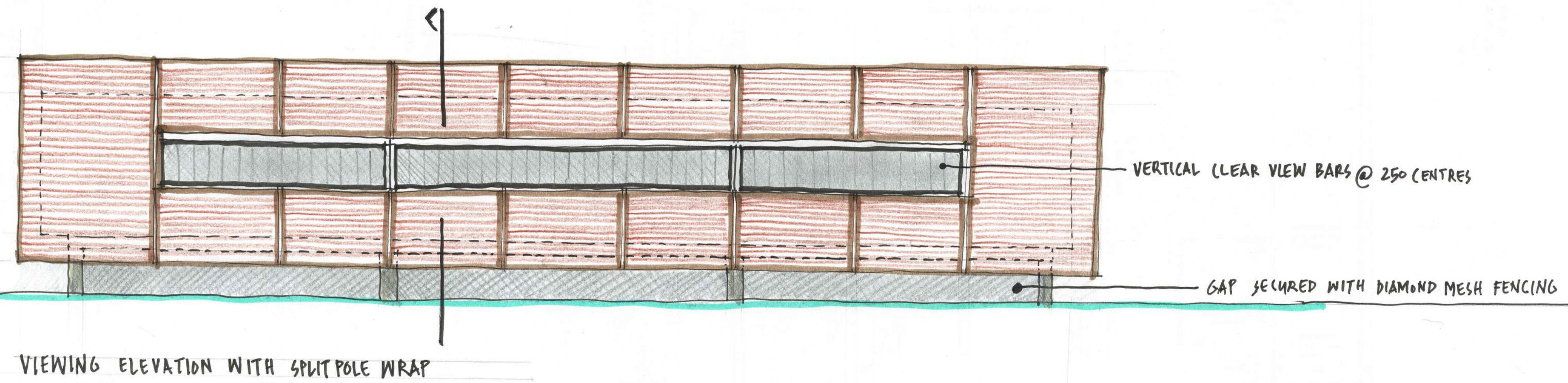
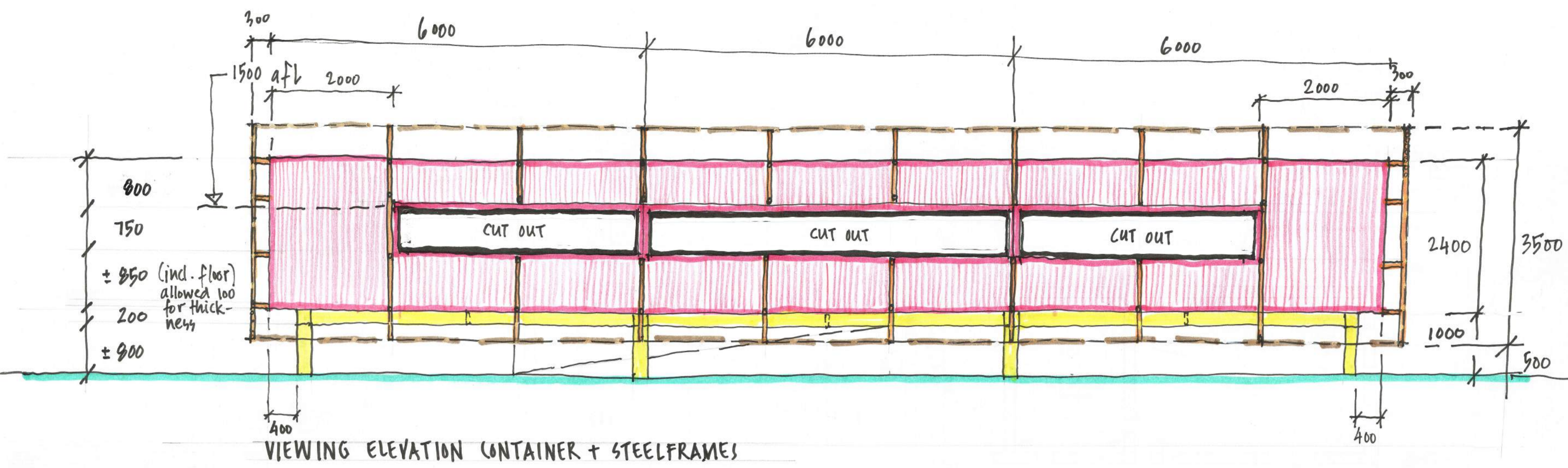
Website: www.eccenvironmental.com

APPENDIX C: ECC'S CV

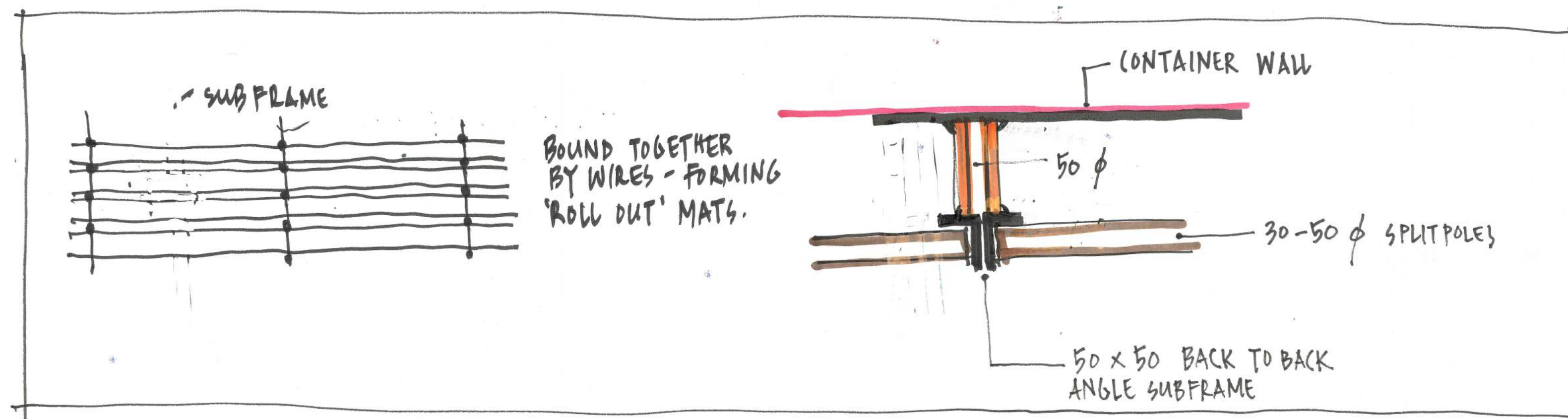
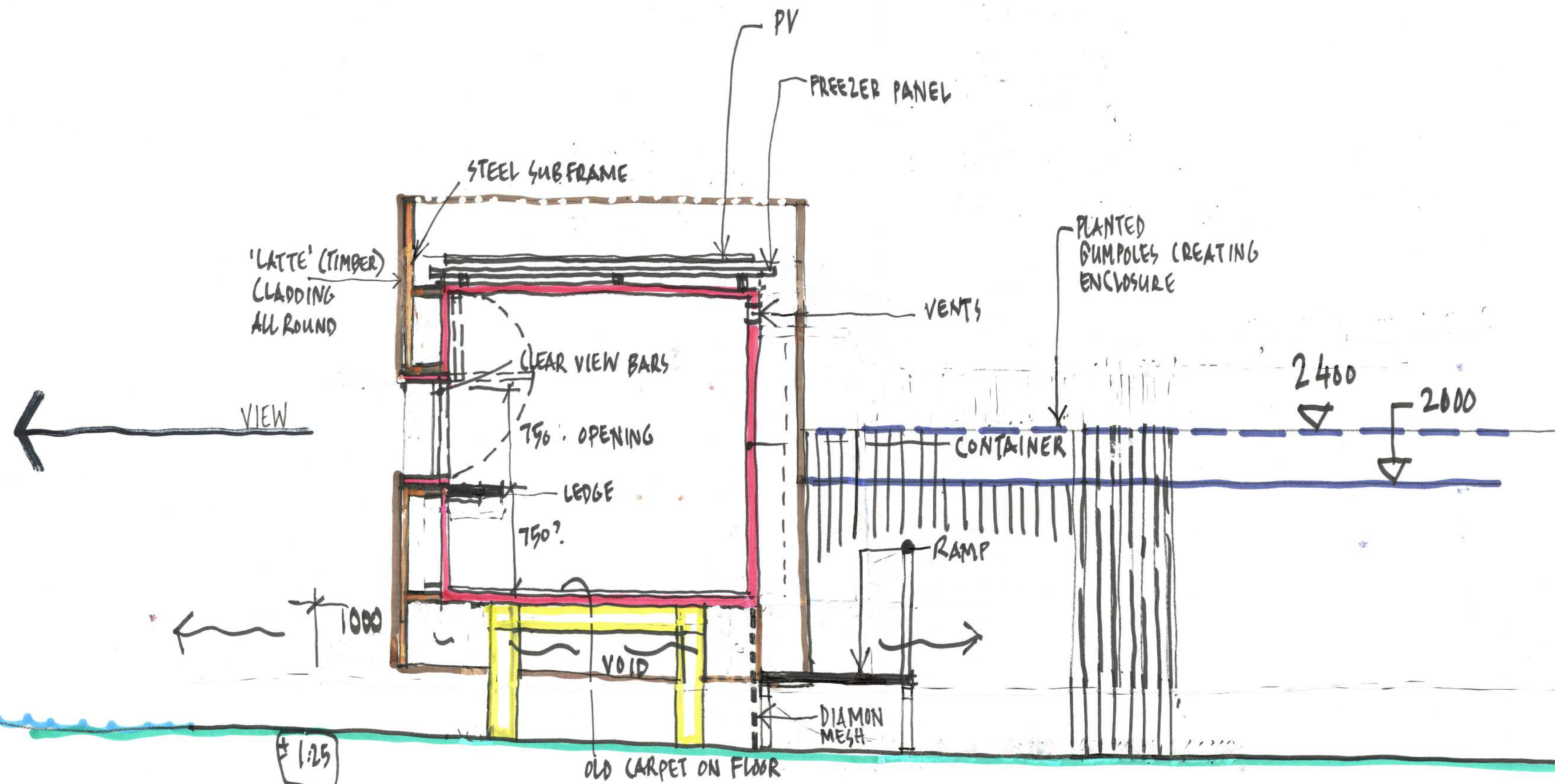
VIEW



PLAN 1:50



ELEVATIONS 1:50



SECTION 1:25

APPENDIX C – ECC CVS



ENVIRONMENTAL
COMPLIANCE CONSULTANCY

Jessica Mooney

Environment & Safety Specialist

Hello! :)



ABOUT ME

Name

Jessica Mooney

Born

24 October 1984

Phone

+264 81 653 1214

Email

Jessica@eccenvironmental.com

Website

www.eccenvironmental.com

Contact me!

How to reach me!

+264 81 653 1214



Jessica.mooney7



+264 81 653 1214



Jessica Mooney



Education & Qualifications

Federation University
Australia
2003-2006

Bachelor of Applied Science -Environmental Management

Additional
Qualifications

Management Systems Leadership
ICAM - Incident Cause Analysis Method
Certificate II in Metalliferous Mining core safety and risk management
Certificate III in Mine Emergency Response & Rescue
Level 3 – HLTFA402B Apply Advanced first Aid
Emergency Rope Rescue
Level 2 - 21593VIC First Aid level 2
Bonded Asbestos Removal >10m2
Leading and Managing People –
Brisbane North Institute of TAFE



Current

Experience & Work History

Environment and Safety Specialist

Environmental Compliance Consultancy
Providing professional consulting services to clients in Namibia with particular focus on approvals, ECCs, reporting and compliance.

- ECC Approvals
- Mine Closure Plans
- Rehabilitation
- Pipeline projects
- Cultural Change programmes
- IMS (ISO14001 and 18001)

Group HSE Manager

Weatherly Mining Namibia

An exciting role covering the breadth of two operational underground mines (Otjihase and Matchless) and the construction of a new open pit mine (Tschudi) working for Weatherly Mining in Namibia, Africa.

- Managed company's SHEQ portfolio
- Full scale construction of new greenfield mine into operational copper mine
- Reduced LTIFR by 90% from 23.1 to 2.4 in 22 months!
- Implemented integrated management system
- Approvals, ECC renewals and EMPs
- Established the first mining environmental forums in Namibia
- Implemented SAFE COPPER cultural change programme



ENVIRONMENTAL
COMPLIANCE CONSULTANCY

Jessica Mooney

Environment & Safety Specialist

References

Feel free to ask the boss :)

MR CRAIG THOMAS

Managing Director
Weatherly Mining

MR COLIN BULLEN

Managing Director
Imerys (client)

Group Manager Lihir Gold

MR NICK CURREY

Director at Sustainable Mining Strategies

Or ask those who have worked for me?

Ms Asteria Salmon

Worked as Control Room Operator
WMN

Mr. Hermanus Lamprecht

Paramedic Safety Officer

Professional Associations

- Chamber of Mines Namibia
- Women on Boards
- The Chamber of Minerals and Energy of Western Australia Industry Member – Mining, Minerals and Resources

Fun Facts:

- I can deadlift 135kg
- To keep fit I Olympic weight lift
- I run ultra Marathons & the longest run yet the fish river Canyon 65km
- I am one of 6 children - do you think that means 4 of us suffer middle child syndrome?

Words I live by:

‘The journey will bring you
happiest, not the
destination’



Experience & Work History

Environmental Consultant

Ensolve Pty Ltd - Australia

In February 2013 an opportunity came about to launch my own business, Blue Wren Environmental Services.

During this time I have worked alongside Ensolve Pty Ltd to deliver several environmental projects including:

- A mine closure project taking an operating mine site into the rehabilitation and closure phase. This project involved the full development of a mine closure plan, facilitation of the government approvals, stakeholder engagement and technical environmental studies to inform the mine closure plan
- Sustainability reporting in accordance with the Global Reporting Initiative
- Rehabilitation of historic exploration sites and obtaining associated government approvals for relinquishment of bonds.

Site Environmental Manager

Panoramic Resources – Australia

- Brought the site into full compliance with the Environmental Licence within 1 year.
- Managed projects relating to the expansions of the current mine tailings dams including obtaining approvals under the Mining Act 1978 and Environmental Protection Act 1986.
- Managed the environmental and community aspects of three operations; Savannah Nickel Mine, Copernicus Nickel Mine (currently in care and maintenance) and the operations at Wyndham Port
- Responsible for the environment, sustainability and social reporting portfolio
- Developed productive working relationships with local government environmental agencies and non-government agencies, which assisted with the approvals process.
- Developed strategies for the recruitment and retention of local Indigenous personnel

Environmental Systems Coordinator

Lihir Gold Limited – Australia

Working on site to provide technical environmental and community advice to ensure all regulatory and licence obligations were met or exceeded

- Regulatory Approvals (State and Federal Government)
- Environment and social aspects of the international cyanide management code
- Operational budgeting and bond management for mine closure
- Compliance with the legislative framework
- Community engagement



Titus Shuuya

SENIOR SCIENTIST ENVIRONMENTAL PRACTITIONER

Hello! :)



ABOUT ME

Name

Titus Shuuya

Born

14 April 1983

Email

titus@eccenvironmental.com

Website

www.eccenvironmental.com

Contact me!

How to reach me!

+264 85 301 3777

+264 85 301 3777

References

JESSICA MOONEY

Environmental and Safety Consultant

DR. GILLIAN MAGGS-KÖLLING

Executive Director
Gobabeb Research and Training Centre

Words I live by:

*'A slow movement of a cheetah
is not a mistake but a
calculated accuracy'*



Education & Qualifications

Namibia University of
Science and Technology,
Namibia
2016

*Master of Science in Natural Resources
Management*

University of Namibia,
Namibia
2013

*Bachelor of Science in Integrated Environmental
Science*



Experience & Work History

Current

Senior Scientist Environmental
Practitioner

Environmental Compliance Consultancy

- Providing professional consulting services to clients
- Environmental Assessment activities
- Participate in environmental requirements of projects, including licences, monitoring and reporting
- Field work and on-site support
- Conduct training

Jul 2012 -Jul
2019

Senior Researcher

Gobabeb Research and Training Centre

- Managing all planning and logistical implementation of field projects, particularly with reference to the Biodiversity Research and Monitoring Program
- Data analysis and report writing
- Develop long-term ecological monitoring program for the uranium mines in fulfilment of their EMP requirements

Dec 2015 -
Apr 2016

Ecologist

Cheetah Conservation Fund of Namibia (CCF)

- Assist in all aspects of CCF's ecology research
- Write research proposals and scientific publications
- Coordinate the de-bushing project and harvest and horticulture activities

Hello! :)



ABOUT ME

Name

Emerita Lyapaka Ashipala

Born

15 February 1994

Phone

+264 81 701 6851

Email

emerita@eccenvironmental.com

Website

www.eccenvironmental.com



Education & Qualifications

Glasgow Caledonian University, UK
2017 - 2018

Master's Degree in Environmental Management (Oil & Gas) (Distinction)

University of Namibia
2013 -2016

Bachelors in Environmental Biology



Experience & Work History

Environmental Graduate

Current

Working with Environmental Compliance Consultancy
Providing professional consulting services to clients in Namibia with particular focus on:

- Drafting EIA adverts and NTS documents
- Assisting in the development of scoping reports and Environmental Management Plans for exploration projects

Intern

Community-Based Natural Resource Management (CBNRM) Project, GIZ Namibia

Roles and Responsibilities:

- Managed a high-volume workload within a deadline-driven environment.
- Responsible for weekly press review.
- Compilation and analyses of data collected from field for baseline study of projects.
- Assists in project management activities.
- Ensure work ethics is compliant with approved codes and standards.
- Even/workshop assistance planner.
- Engaged in clients and stakeholders' meetings.
- Provides overall project management support throughout the entire life cycle of projects.

Team Leader (*Ad hoc Registration Official*)

Electoral Commission of Namibia

Roles and Responsibilities:

- Kit operator
- Printing of registration cards
- Responsible for keeping order and safe guarding of all equipment



Emerita Lyapaka Ashipala

Environmental Graduate

References

Feel free to ask the boss :)

JESSICA MOONEY
Environment & Safety Specialist

STEPHAN BEZUIDENHOUT
Managing Director

Or ask those who have worked with me?

Prof Jim Baird
Programme Leader
Glasgow Caledonian University
j.baird@gcu.ac.uk

Fun Facts:

- *I am an adventurous*
- *Passionate on learning more about Oil and Gas*

Words I live by:

"Be willing to go all out, in pursuit of your dream. Ultimately it will pay off. You are more powerful than you think you are."



Experience & Work History

Undergraduate Internship

South African Science Of Climate Change and Adaptive Land Management (SASCCAL), Namibia
Role and Responsibilities:

- Compilation of news in all regions, for newsletter publication
- Using qGIS to digitise map drawings
- Organising various task research portfolios

