

Environmental Management Plan
For the
Spitzkoppe Cultural Village
in the
!Gaingu Conservancy located in the
Erongo region.



Prepared by:



PACHYDERM
Environmental Consultants cc

May 2020

IDENTIFICATION OF THE APPLICATION IN RESPECT OF WHICH THE ENVIRONMENTAL MANAGEMENT PLAN IS SUBMITTED.

Project Name	Spitzkoppe Cultural Village
Stage of Report	Environmental Management Plan
Client	Spitzkoppe Cultural Village Ben Naruseb +264 (0) 81 209 5911
EA Consultant	Pachyderm Environmental Consultants Enquiries: Alton Tsoaseb Tel: +264 81 214 6730 pachyconsultants@gmail.com
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Author	Alton Tsoaseb

ENVIRONMENTAL ASSESSMENT PRACTITIONER DECLARATION

I hereby declare that I do/will:

- (a) Have knowledge of and experience in conducting specialist assessments, including knowledge of the Environmental Management Act (Act 7 of 2007) and the Regulations and Guidelines that have relevance to the proposed activity;
- (b) Perform the work relating to the application in an objective manner, even if these results in views and findings that is not favourable to the applicant;
- (c) Comply with the abovementioned Act, its Regulations, Guidelines and other applicable laws.

I also declare that there is, to my knowledge, no information in my possession that reasonably has or may have the potential of influencing –

- (i) any decision to be taken with respect to the application in terms of the Act and its Regulations; or
- (ii) The objectivity of this report, plan or document prepared in terms of the Act and its Regulations.

Alton Tsowaseb

Alton Tsowaseb

Environmental Assessment Practitioner

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1. Background

1.1 Introduction

An application has been submitted to the Directorate of Environmental Affairs (DEA) by Pachyderm Environmental Consultants cc on behalf of its client Spitzkoppe Cultural Village (SCV), for the proposed Cultural Village (CV) in the #Gaingu Conservancy located in the Erongo region in Western Namibia.

DEA requires that the Applicant undertake a Basic Assessment (BA) for the proposed development, and that the Basic Assessment Report (BAR) includes a detailed Environmental Management Plan (EMP). a Basic Assessment (BA) for the proposed development, and that the Basic Assessment Report (BAR) includes a detailed Environmental Management Programme (EMP).

The development will comprise of a Traditional Damara village, comprising of a few huts constructed with sticks, a fire place, picnic sites for tourist and ablution facilities.

The cultural village will be approximately 500 m² in total. The CV will be designed to fit into the surrounding bush environment, with minimal impacts on surrounding flora and fauna.

As part of this legal permit process an EMP has been drafted as part of the Environmental Impact

Assessment process. This serves as a legal document that must be complied with and strictly enforced by the applicant, contractor and any other party associated with the SCV.

2 Legal Framework

There exists various legislation that relates to the environmental industry in Namibia. The environmental legislation continues to evolve, resulting in both legislative and regulatory changes that

have a material impact on any company and its operations, especially in Namibia.

Environmental

legislation in Namibia was promulgated because environmental degradation must at the very least

be minimised and at the most prevented. The Namibian Constitution gives the people of Namibia the right 'to an environment that is not harmful to their health or well-being.

Table 1: Government Agencies regulating Environmental Protection in Namibia

Regulating agency	Role in regulating Environmental Protection
Ministry of Environment and Tourism (MET)	MET is the lead government agency charged with Environmental Monitoring, Assessment and Management. The mission of MET is to maintain and rehabilitate essential ecological processes and life-supported life-support systems, to conserve biological diversity and to ensure that the utilization of natural resources is sustainable for the benefit of all Namibians, both present and future, as well as the international community, as provided for in the Constitution. MET lays foundations to implementation and promulgation of regulations relevant to this project including; the Environmental Act no7. Of 2007, Park and Wildlife Management Bill, the

	Pollution Control and Waste Management Act, The MET plays role in approval of Environmental Impact Assessments (EIAs) which are prepared under Environmental Assessment Policy for Sustainable Development and Environmental Conservation (1995). Provisions in other line ministries' legislation (strengthens MET's position.
Ministry of Mines and Energy (MME)	The MME issues prospecting and mining licences as well as exploration/ prospecting and production licences ensuring that mining activities in Namibia are environmentally sustainable
Ministry of Agriculture, Water and Forestry (MAWF)	MAWF's is the leading agency undertaking the Agricultural, Water and Forestry sectors towards the promotion of an efficient and sustainable socio-economic development of Namibia. MAWF is the regulating body of the promulgation of the Water Resource Management Act, 2004 and the Forest Act 12 of 2001, relevant to this project. The Department of Water Affairs is the government agency responsible for water quality monitoring and reporting.
Ministry of Works, Transport and Communication	The Ministry of Works, Transport and Communication is dedicated to ensuring the availability and the quality and maintenance of transport infrastructure and specialised services. This government body is responsible for implementation of the Roads Authority Act 17 of 1999.
Ministry of Labour	MOL is aimed at ensuring harmonious labour relations through promoting social justice, occupational health and safety and enhanced labour market services for the benefit of all Namibians. This ministry insures effective implementation of the Labour Act no. 6 of 1992.

2.1 Environmental Management Requirements

An important component of an Environmental Assessment process is the review of applicable and relevant legislation pertaining to this project. The legislative and regulatory foundation for protection and management of the environment and its natural resources is governed by the Namibian Constitution. Article 95(l) of the constitution clearly emphasizes the promotion of the welfare of the people, whereby the maintenance of ecosystems, essential ecological processes and biological diversity of Namibia and utilization of living natural resources on a sustainable basis for the benefit of all Namibians, both present and future; in particular.

The Environmental Management Act (EMA) No.7 of 2007 and the Environmental Assessment Policy for Sustainable Development and Environmental Conservation (1995) set the guiding policy/ legal framework for environmental management in Namibia. The intended activity is listed under the EMA regulation of 2012. Section 6 TOURISM DEVELOPMENT ACTIVITIES states that an environmental assessment is required. These instruments make it mandatory for any proposed development to be subjected to an Environmental Assessment procedure. Both promote sustainable development and economic growth while safeguarding the environment in the long run. The figure below illustrates the Environmental Assessment process in Namibia

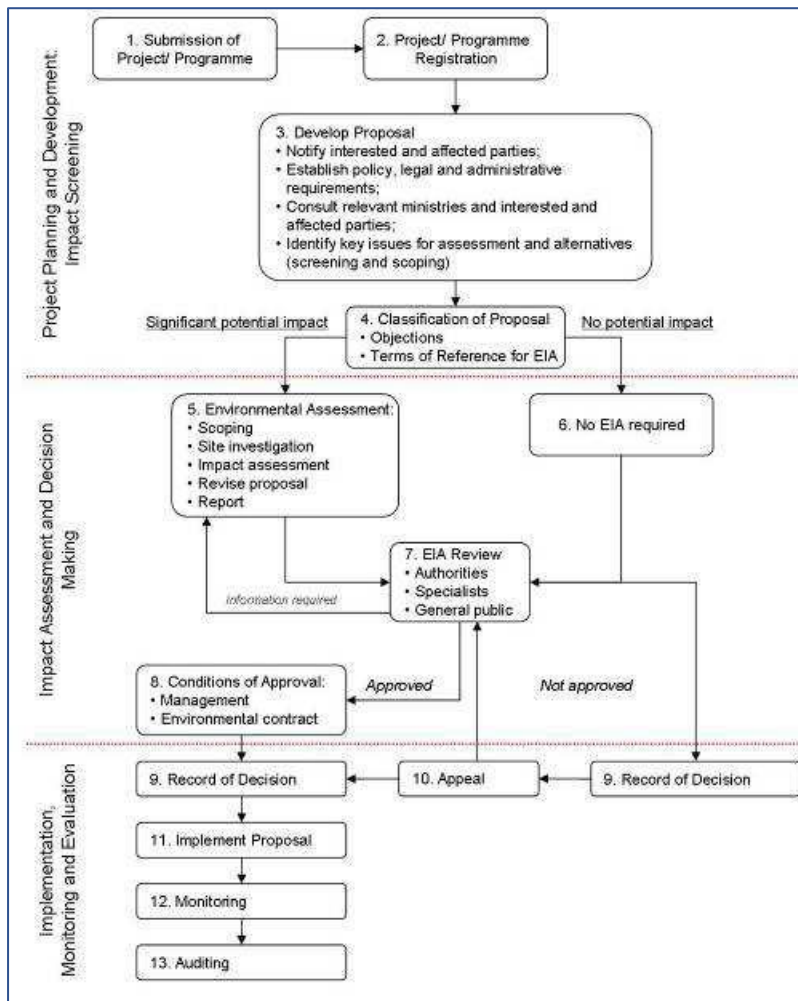


Figure 1: The environmental Assessment Process in Namibia

Currently the project is at Stage 5: Environmental Assessment. Once the Environmental Assessment Process has been completed the final document will be reviewed by the authorities, specialists and the public. Before the project can be implemented, a record of decision will be taken.

2.2 Legislations of international significance

2.2.1 Convention on Wetland and Biodiversity

The Convention on Wetlands of International Importance, especially as Waterfowl Habitat, 1971 (Ramsar) aims primarily to prevent the loss of wetlands, to promote the wise use of these, and to give special protection to listed wetlands. The Convention stresses a habitat-type approach rather than a species-specific approach.

The primary goal of the Convention on Biological Diversity, 1992, is the conservation of biodiversity. The causes of threats to biodiversity should be anticipated and prevented, and the precautionary principle should be applied. Parties to the convention are obliged to:

- Establish a network of protected areas;
- Create buffer areas adjacent to these protected areas using environmentally sound and sustainable development practices; and
- Rehabilitate degraded habitats and populations of species. The provision of this Convention would require SCV to incorporate the biological and physical environment into the conceptual design phase.

2.2.2 Convention on Combating Desertification

The convention recognized that the conservation of biological diversity is “a common concern of humankind” and is an integral part of the development process. The agreement covers all ecosystems, species, and genetic resources. It links traditional conservation efforts to the economic goal of using biological resources sustainably. It sets principles for the fair and equitable sharing of the benefits arising from the use of genetic resources, notably those destined for commercial use.

The objectives of the CBD are:

- The conservation of biological diversity,
- The sustainable use of its components and
- The fair and equitable sharing of the benefits arising out of the utilization of

genetic resources, including by appropriate access to genetic resources and by appropriate transfer of relevant technologies, taking into account all rights over those resources and to technologies, and by appropriate funding.

SCV should therefore prevent the unnecessary removal of any species prior and during the operational phase. Conservation of species and ecosystem to combat the increasing rate of loss of biological diversity is one of Namibia’s challenges due to a heavy reliance on natural resources and ecosystem goods and services. In the interest of welfare of the people, the state has adopted policies aimed at maintaining ecosystems, ecological processes and biodiversity for the benefit of present and future generations. The National Biodiversity Strategy and Action Plan (NBSAP) and the Namibia Community-based Tourism Association (NACOBTA) can assist the Proponent in environmental management issues. Direct impact on biodiversity is minimal but a precautionary approach is necessary to ensure those disturbances are avoided.

2.3 Legislation of National Significance

National legislation exists to protect the environment and threats to public health. Included, among others, are issues related to the protection of public water supplies, nuisances and other public health issues. Nuisances are broadly defined as any condition which is considered to be offensive, injurious or dangerous to health. This definition is broad enough to cover a range of issues, and thus this law may be effective in any instance where public health might be compromised.

2.3.1 Environmental Management

Namibia has an Environmental Assessment Policy (January, 1995) which makes Environmental Impact Assessment obligatory for any activity which may have a significant impact on the environment. The Environmental Management Act, 2007 (Act No. 7 of 2007) which was gazetted on 27th December 2007 is a milestone for Namibia since it is the first environmental management legislation that has been put in place. Essentially the Act gives effect to Article 95 and 91(c) of the Namibian Constitution in that it establishes general principles for the management of environmental and natural resources. The Act further aims to give effect to Namibia’s Environmental Assessment

Policy and promotes the co-ordinated and integrated management of the environment and is therefore of direct applicability to this study

2.3.2 Legislation related to Air Quality

Air pollution is primarily controlled by the Atmospheric Pollution Prevention Ordinance (11 of 1976). This deals with air pollution as it affects occupational health and safety, and no consideration is given to the natural environment. Air Quality aspects will become applicable during the establishment phase, mainly in terms of dust pollution.

2.3.3 Legislation related to Water Quality

The objective of the Water Resources Management Act 24, 2004 is to ensure that water resources are protected, used, developed, conserved, managed and controlled in a sustainable manner for the benefit of all. Water abstraction: Part 7, 28. (1) Subject to subsection (3), a person who abstracts water from a water Resource for domestic use is exempted from the acquisition of a license to abstract and Use water. (2) A person may abstract and use water for domestic use, subject only to such Public health limitations and environmental limitations, and limitations imposed from time to time for purposes of efficient water management practices. (3) Subsection (1) does not apply to a person who abstracts water in bulk from a water resource and supplies it to others for domestic use. Part 8, 32. (1) Unless this Act provides otherwise, a person may not abstract or use Water, except in accordance with a license issued under this Act. (2) In this Part, "abstract water", includes the abstraction of brackish or marine Water for any purpose. Applicable to the envisaged activities is Part ix 46, which; (1) prohibits a person from drilling, constructing, enlarging or otherwise alter a borehole, Or engage in a borehole-drilling programme, for the purpose of exploring for groundwater expect in accordance with a permit issued. In terms of regulation 24(2) waste must be taken back to port and disposed of in a manner satisfactory to the authority responsible for the disposal of waste in the port in question.

2.3.4 Legislation related to soil conservation

The objectives of the Soil conservation Act 76, 1969 are to make provision for the combating and prevention of soil erosion, and for the conservation, protection and improvement of the soil, the vegetation and the sources and resources of the water supplies. Part II, deals with soil conservation works and it further states that in section 4(1) The Minister may by means of a direction order the owner of land to construct the soil conservation works referred to in such direction either on land belonging to such owner or on land belonging to another person, in such manner and within such period as may be mentioned in such direction, if the Minister is of the opinion that the construction of such soil conservation works is necessary in order to achieve any object of this Act in respect of the land belonging to such owner.

2.3.5 Legislation related to Land Use

Applicable to the envisaged activities of SCV are Chapter III, section 15 which describes communal areas in Schedule 1 of this Act. Section 17(1) states that subject to the provisions of this Act, all communal land areas vest in the state in trust for the benefit of the traditional communities residing in those areas and for the purpose of promoting the economic and social development of the people of Namibia, in particular the landless and those with insufficient access to land who are not in formal

employment or engaged in non-agriculture business activities. (2) No right conferring freehold ownership is capable of being granted or acquired by any person in respect of any portion of communal land. Section 18 states that, Subject to such exemptions as may be prescribed, no fence of any nature - (a) shall, after the commencement of this Act, be erected or caused to be erected by any person on any portion of land situated within a communal land area; or (b) which, upon the commencement of this Act, exists on any portion of such land, by whomsoever erected, shall after such date as may be notified by the Minister by notice in the Gazette, be retained on such land, unless authorization for such erection or retention has been granted in accordance with the provisions of this Act. Section 30 stipulates that Subject to subsections (3) and (4) and section 31, a board may, upon application, grant to a person a right of leasehold in respect of a portion of communal land, but a right of leasehold for agricultural purposes may be granted only in respect of land which is situated within a designated area referred to in subsection

(2).

(2) The Minister, after consultation with the Traditional Authority and the board concerned, must designate by notice in the Gazette, in respect of the communal area of each traditional community, an area within which that board may grant rights of leasehold for agricultural purposes. (a) the grant of the right of leasehold will not unreasonably interfere with or Curtail the use and enjoyment of the commonage by members of the traditional community; and (b) In the circumstances of the particular case, reasonable grounds exist for the grant of approval. (4) Subject to subsection (5), a board may grant a right of leasehold only if the Traditional Authority of the traditional community in whose communal area the land is situated consents to the grant of the right. Applications for usage of communal land and leasehold can be granted to the proponent provided that an Environmental Impact Assessment (EIA) is undertaken and approved.

3 Description of the Local Environment

This section describes components of the existing environment that could be affected by the Proposed Action. The environmental components described include air, water, land use and socioeconomics.

3.1 Water: A brief overview

Rainfall distribution throughout Namibia is extremely variable with evaporation in excess of precipitation. Water availability in general is also variable from one year to the next, making arid and semi-arid regions, such as Namibia, very vulnerable to a succession of dry years. These variations can be attributed to changing weather conditions and, to some extent, (increasing) water-use demands.

Social and economic factors greatly influence access to water. Namibia lacks the capital and technology to tap potential water resources such as those that can be extracted from sea water by desalination.

Among the greatest single factors influencing the availability of fresh water is human population growth. Higher population numbers, coupled with increasingly higher standards of living, elevates the demand for finite quantities of water and intensify competition and tension among users. With increasing urbanization, industrialization and other developments (e.g. mining) in different parts of the country the demand for more water continues to be a challenge.

Economically viable groundwater resources in Namibia come mainly from porous (unconsolidated deposits) and fractured aquifers (hard rock terrain). Regional fractured

aquifers are characterized by fractured hard rock with secondary porosity and permeability, and include dolomitic and quartzitic rocks, respectively. These are found mainly in the north-central areas, around the Otavi Mountains and central highlands, and particularly the southern part of Windhoek. Aquitards and aquicludes provide vital sources of local water supplies for many small settlements and farm holdings throughout the country. The regional unconsolidated porous sediments have primary porosity and permeability and consist of gravels, calcretes, sands and silts of the Namib Desert (palaeochannels) and the thick Kalahari deposits of the southern, eastern, northern and north-eastern parts of the country. The amount of groundwater available at any given time is dependent on the hydrogeological settings of the area and rainfall or artificial recharge.

Surface water in Namibia is generally very limited and regarded as precious resources where they are available all year round. Surface water at Spitzkoppe village is very limited. On rare occasions flood water is carried by the Spitzkoppe River which originates from high elevations in the surrounding Spitzkoppe Mountains. Water for domestic use is obtained from the underlying aquifer through boreholes or obtained from Namwater and stored in elevated tanks.

3.2 Vegetation

Seven broad vegetation types are found in the Erongo Region. The vegetation in the study area is dominated by *Acacia* species, *Commiphora glaucescens* and *Euphorbia virosa*. Many plants in the area are used for grazing and browsing by livestock. The area is also prominently covered with grass, which forms as the first vegetation and gives the soil its initial classification. Grasses are all plants belonging to the family Poaceae. They can be described as tuft forming or creeping plants without brightly coloured flowers and long, narrow leaves.

Naturally occurring grasses are essential for livestock farming by farmers in the area.

Red data plants

The Namibian red data list (RDL), consisted of 1,152 taxa in 2004 and was still preliminary since ongoing studies and fieldwork are continuously being undertaken to verify existing information and to gain new insights in areas of uncertainty. The RDL only features spermatophytes (i.e. plants that reproduce by means of seeds) due to the lack of knowledge and data about the taxonomy and distribution of lower plants. The Table below shows the outcome of the red data plants assessed for Namibia while figure 12 shows the proportion of confirmed endemics, near endemics and suspected endemics of these red data plants.

Declared weeds and invader species

Invader species threatens endemic biodiversity and are predicted to become the second-largest threat to biological diversity in the future (Sala et al. 2001). It is believed by some (e.g. Barnes & De Jager 1996) that invasive (alien) species can enrich the biodiversity of certain areas, however, many such species are pests and can cause major damage with significant economic impact (Mooney 1989). In some cases, they can actually reduce diversity by out-competing indigenous species. Quantitative information and data about invader species in Namibia is very scarce. Such data are collected through specific projects with aims and objectives at times not in line with national intentions to generate information and data about invader species to inform policy intentions.

Bethune et al. (ibid.) identified eleven alien animal species as having the potential of becoming extremely invasive in Namibia. These range from the domestic cat (*Felis catus*), to the hybrid (*Felis catus/ lybica*) and to rodents that are common mainly at the coast. No terrestrial invader animal species are currently known in the project area and this may well be due to a lack of information and data. Nine invasive (alien) plant species are identified in Namibia with some having the potential to severely impact on local plant diversity as they consume significant amounts of water and aggressively invade areas where endemic species thrive. Some of these, such as the *Prosopis* species, are also well-known culprits of bush encroachment in commercial farming areas. Invader bush aggressively takes over the habitats of endemic species and cost the Namibian agriculture industry millions of idollars annually.

3.3 Namibia's Biodiversity in General

3.3.1 Avifauna

Avifaunal diversity in Namibia is shown in the figures below. Species diversity in the project area ranges from 81 to >110 species. The conservation status of all recorded/ known bird

species (Figure 15) in Namibia although the geographic distributions of these are not indicated.

3.3.2 Mammals

Larger mammals, especially those of economic value, have undergone major reductions in their distributional ranges in the past. The populations of many species (e.g. rhinos, elephants, various antelopes) have recovered/ increased over the past 10 years due to increased conservation measures such as the establishment of communal conservancies, community forests (CFs) and expanding the protected area network in Namibia. Recent and current donor funded initiatives strengthens the capacities of the Ministry of Environment and Tourism (MET) to improve the management effectiveness in parks, the natural resource management capacities of communities in conservancies and CFs and the availability and reliability of scientific information and data about mammals.

Plains zebra and lions experienced more than 95% reduction in range over the past 200 years. Other species regarded as vulnerable are Springbok, Gemsbok and Kudu are very limited near the project area. Little evidence of wildlife fauna was observed during the site visits. This can be attributed to the fact that human activities such as livestock herding occur within the subject area. Because of human interference wildlife species usually migrate to less disturbed areas. Insects and lizards are known to be common this area.

3.4 Ecological Sensitivity

The #Gaingu Conservancy is located towards the north-central and eastern part of the Erongo region. Conservation measures are in place to ensure the success of large mammals and their habitats and/ or ecosystems they rely on are protected. The project area will not be excavated or cleared of vegetation at all. All new structures will be erected in such a manner as to preserve the original state of the area. The envisaged impacts at the project site, is thus not of such magnitude and/ or significance that it will have irreversible impacts on the biodiversity and endemism of the area and Namibia at large.

3.5 Air Quality

3.5.1 Future Dust and Air Releases

Fugitive dust only includes dust generated by vehicles driven by local, tourists and the general public travelling along the gravel/ dirt roads. Currently no dust suppression methods are used to minimize emissions.

Vehicle exhaust emissions primarily come from small vehicles, trucks, earthmoving and processing equipment from the brick manufacturing plant. Tourist and other activities in the area also contribute to these emissions, however on a lower scale.

3.5.2 Biomass Burning

Biomass burning primarily occurs for the generation of heat and light for cooking, warmth and lighting. The amount of biomass burning is not known and is assumed to be insignificant in relation to the overall size of the area. SPYDECO and the rest of the people of Spitzkoppe should be encouraged to use invader/ encroacher bush species for biomass burning.

3.6 Heritage and Cultural Resources

Based on information received from the National Heritage Council of Namibia, there are no areas of heritage and cultural importance within the proposed project area. Proposed tourism and agriculture activities will also not impact on any heritage and cultural resources.

3.7 Social

The number of people to be employed is about 15 during the construction phase and 20 during the operational phase. It is expected that nobody at Spitzkoppe village will be displaced as a result of the implementation of this project. Unemployment in the local community is perceived to be high.

4 Stakeholder Consultation

The purpose of public participation is to increase awareness by involving people who are directly affected or concerned about this development. This should be a vital factor during the planning and success of the development. Allowing public approval gives assurance and a sense of partnership with the developer and prevents unnecessary disputes and costs during the establishment of the project.

It is also a legal requirement that the public be involved in development projects that may potentially affect their quality of life, negatively and positively, and that all significant concerns raised be addressed and communicated to all relevant stakeholders. The purpose of stakeholder consultation is to ensure Interested and Affected Parties (I&APs) form part of the decision-making process.

Various stakeholders were informed about the project, and gave the consent for the project to go ahead as it will give a much-needed economic boost to the community. A notice was given on the Pachyderm Environmental Consultants Facebook and Instagram pages (https://www.facebook.com/pachyconsultantscc/settings/?tab=page_info&ref=page_edit) ; however, no reply was received. Follow the link below, a notice was also posted on the #Gaingu Conservancy Office, however no party registered and no public meeting took place.

Consent from nearby businesses was received and is included in the Appendices.

5 Purpose of the EMP

The EMP contains the necessary mitigation and recommended actions as well as the timeframe and person responsible for the actions. The ultimate responsibility of the implementation of the EMP rests on the SCV owners.

The EMP is a legally binding document that is an important part of the Environmental Assessment process and needs to be strictly adhered to. Workers and contractors must be made aware of the EMP, their responsibilities and sensitive /no go areas. Any transgressions must be treated as serious, with remedial action taken. It is important to note that Namibia is currently experiencing a major drought and thus every effort must be made to conserve water and ensure water is not wasted during the different phases of the development.

5.1 Objectives of the EMP

This EMP has the following objectives:

- To outline functions and responsibilities of the responsible persons involved in the construction and operation of the proposed SCV;
- To state standards and guidelines which are required to be achieved in terms of environmental legislation;
- To outline mitigation measures and environmental specifications which must be implemented to ensure environmental and social protection of the surrounding environment; and
- To prevent long-term or permanent environmental degradation.

5.1.1 Structure of the EMP

The EMP provides mitigation and management measures for the following phases of the project:

- Cultural Village pre-construction

Pre-construction planning is an important phase in ensuring that impacts during the subsequent phases are mitigated and that the EMP will be properly implemented and strictly enforced. The phase lays the foundation for the construction phase.

- Cultural Village Construction

This involves the construction of the proposed SCV and its associated infrastructure. This phase has the potential to have the greatest impacts on the environment if proper mitigation measures are not implemented.

- Cultural Village Operation

This section of the EMP provides management principles for SCV commencement. Environmental actions, procedures and responsibilities as required for this phase of CV operations, are specified.

- Rehabilitation Phase

This section of the EMP provides management principles for the rehabilitation phase after construction and if decommissioning of the project is required. Rehabilitation must be viewed as an on-going process.

5.1.2 Key Role Players

- Owner/Operator Spitzkoppe Cultural Village

The applicant (Spitzkoppe Cultural Village) Ltd) is ultimately accountable for ensuring compliance with the EMP and the conditions contained in the Environmental Clearance

Certificate (ECC). The Environmental Officer (EO) must be contracted by the applicant as an independent appointment to objectively monitor implementation of relevant environmental legislation, conditions of EA's, and the EMP for the project. The applicant is further responsible for providing and giving a mandate to enable the ECO to perform his/her responsibilities. The applicant must ensure that the ECO is integrated as part of the project team.

- Manager Spitzkoppe Cultural Village

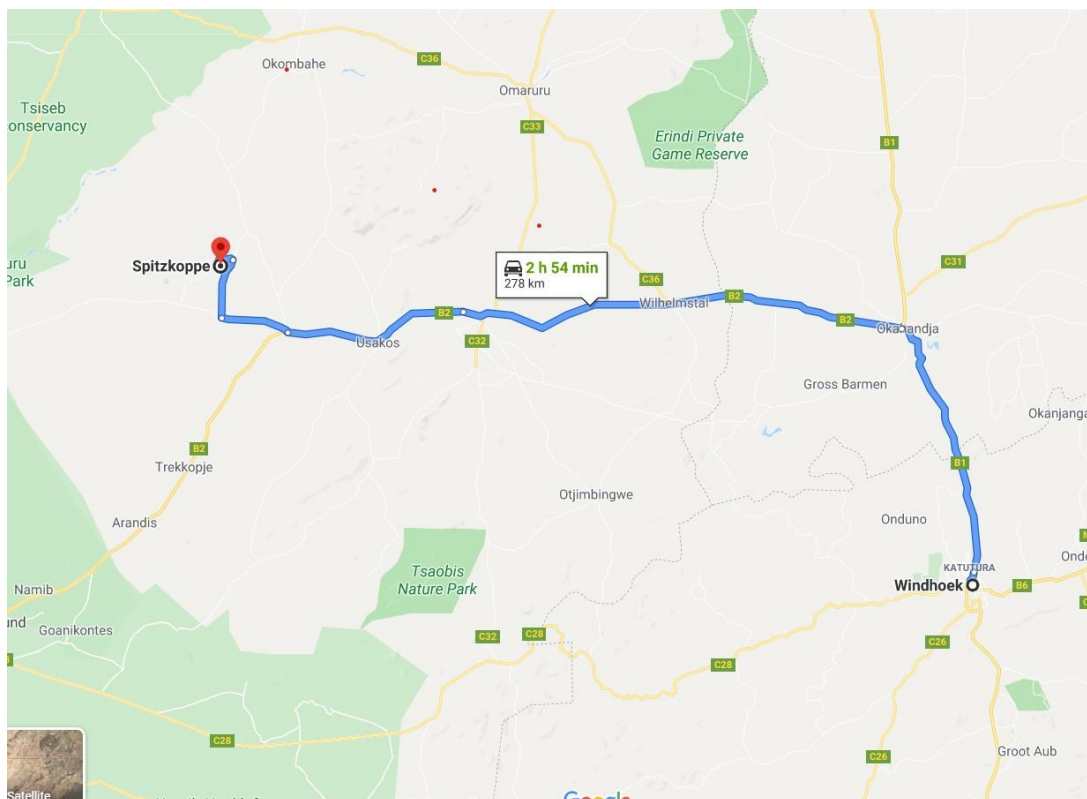
The Spitzkoppe Cultural Village has over-all responsibility for managing the project, contractors, and consultants and for ensuring that the environmental management requirements are met. All decisions regarding environmental procedures must be approved by the Manager. The Cultural Village has the authority to stop any operational activity in contravention of the EMP. In this instance owner will be Manager during construction.

- Environmental Officer

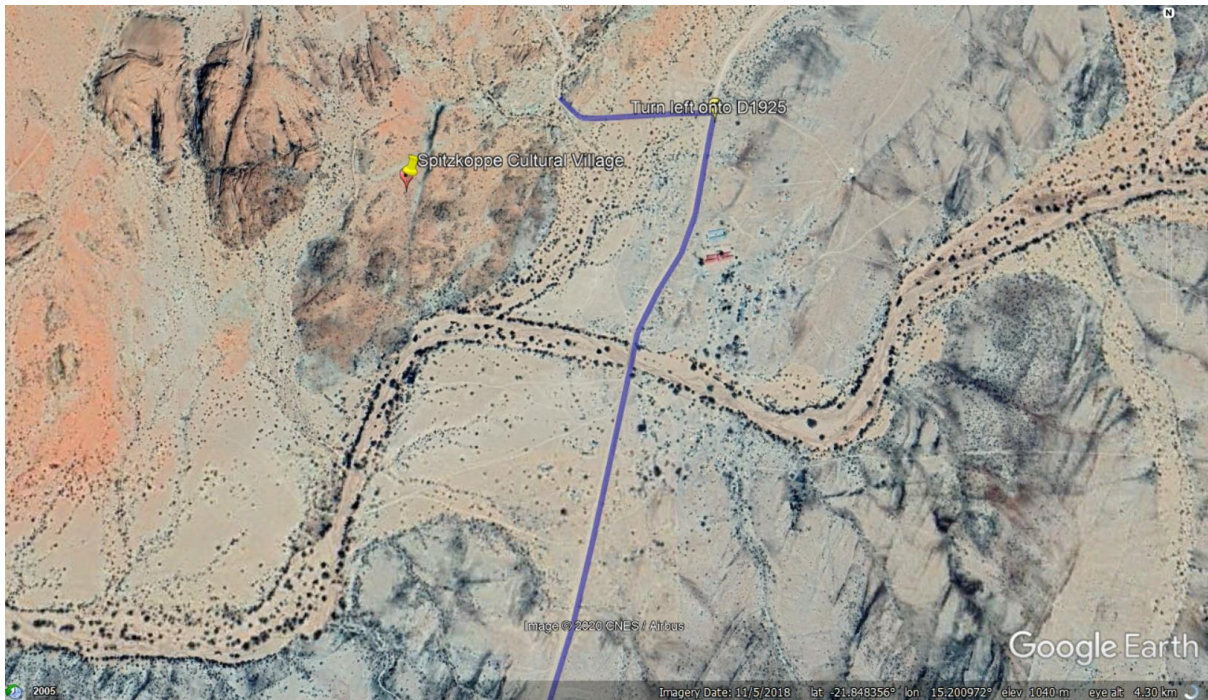
Manage the day-to-day on-site implementation of the environmental specifications during the construction and operational phases, and provide support and input where required. The owner/Manager will also double as the EO.

6 Project Description

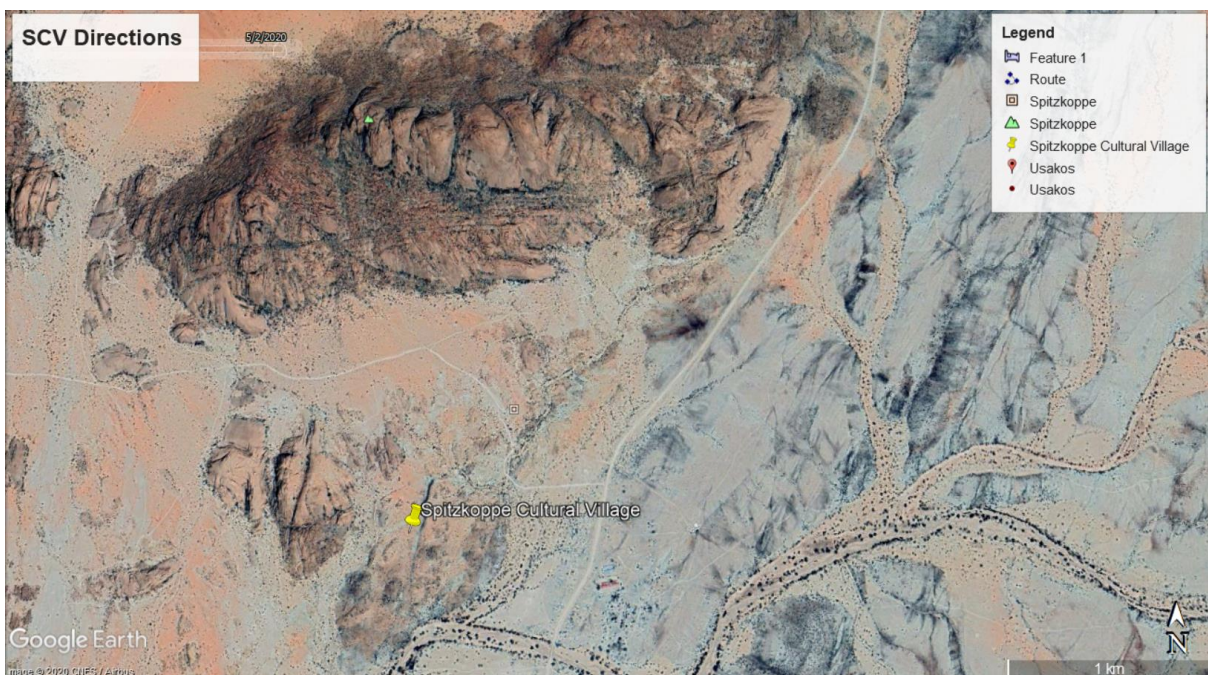
The project is located in the #Gaingu Conservancy, in the Erongo region. The location of the project is illustrated in the maps below. The exact GPS location of the project is S21.84339 E015.19667.



Map 1: Project Location overview



Map 2: Google earth image



Map 3: Location SCV (Google Earth)

6.1 The Need for this project

The Spitzkoppe Mountains is a national monument and popular tourist attraction. Due to fairly constant and stable weather conditions and the iconic Spitzkoppe mountains the area attracts tourists throughout the year. Despite Spitzkoppe's popularity as a tourist attraction, wage employment opportunities for native youth are exceedingly limited. The youth at Spitzkoppe village are in need of employment and a means of fulfilling the desire of doing

something conducive and developmental toward their community. The Spitzkoppe mountain area experiences a significant influx of tourists especially during holiday and peak seasons.

The designated accommodation facilities within the Spitzkoppe area can sometimes experiences a vast majority of visitors, that often want to experience the traditions of the Damara People, with modernisation the traditional knowledge and skills of the damara people are being masked westernization.

The Spitzkoppe Cultural Village have noticed an opportunity to keep the traditions of the Damara People alive, by constructing a Cultural Village to educate the young people about their cultural heritage and in the same vain earning an honest living by educating visitors about the history and the culture of the Damara People, through traditional cuisine, traditional performances and storytelling.

6.2 The Proposed development

The construction of the project has already commenced; however, all construction was halted as the proponent was not aware that an ECC was required. The pictures below show at which level the current construction is.



Photo 1: Spitzkoppe Cultural Village

The Cultural Village will consist of 3 Traditional huts in a homestead setting, constructed with dead trees and MUD. The area will also be fenced with dead tree material.

The homestead will 3 traditional huts and a fire place, and a shaded area. All activities are expected to take place around the fire place.

Around the fenced area, a few picnic sites (with braai facilities) will also be constructed were tourist can stop and relax before continuing the journey and prepare food and enjoy drinks.

Traditional cuisine will also be served, along with cold beverages.

Communal French drain communal toilets will also be set up for guest. No permanent structures are expected to be set up on the property

6.3 Project location

The envisaged development will take place at Spitzkoppe and the location of the project is best appreciated in the figures below:

6.4 Infrastructure and Services

STC plans to utilize water from the existing borehole(s) on the allocated premises. The water obtained from the borehole(s) will be used in activities for both the constructional phase and operational phase. The amount of water to be used is not yet known.

6.4.1 Waste water and effluent treatment

A French drain system will be set up, and sewage will be removed constantly by an independent contractor, construction of the French drain system will be carefully monitored to ensure that there is no seepage of sewage into the ground. The nearby borehole will be used for both construction, operation as well as sewage.

6.4.2 Energy supply

Namibia is a sunny country with high levels of solar radiation. About 300 sunny days per annum are experienced (Guidelines for building in an energy efficient manner, 2008). Solar radiation is lowest along the coast at up to 5.2 kWh per m². Solar radiation gradually increases inland along the coastal plain to about 5.8 kWh per m². The highest radiation values are recorded on the plateau in central northern Namibia with values of between 6.2 and 6.4 kWh per m² as a result of the high sun elevations.

For purposes of this project, a combination of solar panels and gas will be used for the operational phase of the proposed cultural village.

6.4.3 Solid Waste Management

Suitable waste design technologies should be taken into consideration in avoiding waste generation. A method of waste segregation will be adopted to separate solid waste into recyclable groups such as glass, plastic and paper. These recyclable items together with any hazardous waste such as cooking and automotive oil will be transported to Usakos to be recycled or disposed at the municipal landfill site. No new landfill is anticipated at the project site.

7 Environmental Impacts

Potential environmental impacts associated with the envisaged development are listed below, with a brief comment made in each case as to their relevance and significance to this particular project.

7.1 Impacts related to fresh water

Impact Description:

No detailed geo-hydrological study has been done to determine the sustainability of the community water-point. Due to this uncertainty it is not clear whether this resource can be utilized sustainably over prolonged periods. This is an important source for all parties involved and it could potentially lead to conflict if this resource is not managed properly

Mitigatory Measures:

- The Proponent should ensure that a formal agreement is put in place with Spitzkoppe Tented Camp and Campsite regarding the use of their water point.
- The quantities of water drawn from the community water point during the construction phase should be recorded and records should be kept.
- The Proponent should ensure that water is used sparingly during the construction phase of the project to minimize water wastage.
- The water point is commonage and must be shared by all community members. It is advisable that the proponent adhere to the water point constitution.
- The water point association has the power to plan and control the use of communal land in the immediate vicinity of the water point in cooperation with the communal land board and the traditional authority concerned;
- Wastewater can be used for cleaning and wetting the roads etc. Water reuse and recycling cannot be underestimated as a conservation mechanism;
- Groundwater should be monitored periodically by taking samples from the existing well to curb potential health impacts;
- Legal reference: Water Resources Management Act 24 of 2004 and the Water Act 54 of 1956;

7.2 Impacts related to loss of biodiversity

Impact Description:

Some trees and bushes may be unnecessarily removed or damaged, either deliberately or inadvertently, by construction vehicles. Loss of indigenous species leads to loss of biodiversity. Furthermore, ecological health is linked to human health and it therefore important that protected and species found on the project site is conserved

Mitigatory Measures:

- The Proponent should ensure that where practically possible, established vegetation and trees are incorporated into the design of the cultural village
- During the construction phase and the operational phases of the project the promotion and awareness regarding species preservation should be promoted.
- Vegetation found on rock outcrops are the most difficult habitats to restore; the practical solution is to ensure this vegetation is not disturbed.
- Incorporate the existing natural features of the site into the design to reduce impact on the natural environment;
- Do not engage in unsustainable land use practices such as over-harvesting of natural resources;
- Avoid removal as far as possible of indigenous plant species to preserve and maintain vegetation cover;
- Legal reference: Nature Conservation Ordinance 4 of 1975 and

Environmental Management Act 7 of 2007;

7.3 Impacts related to Archaeological Significance

Impact Description

With the establishment of the cultural village there will be an increase in the number of people that would normally visit this area. The remainder of the rock paintings could be further damaged during the construction and operational periods if people are not made aware of the conservation potential.

Mitigatory Measure

- The Proponent should signpost, demarcate and zone the rock painting site;
- It is important that stone artefacts should be left undisturbed and it should not be moved from its original place;
- Legal reference: National heritage Act of 2004;

7.4 Impacts related to domestic sewage effluent disposal

Impact Description

The total quantity of effluent that will be generated is not yet known. If ablution facilities are not cleaned and monitored regularly it can become septic and a hive for breeding bacteria and disease. If not stationed properly subsurface water sources may be contaminated
Mitigatory Measure All ablution facilities should be cleaned by staff at regular intervals. Samples of nearby water sources should be taken to monitor the water quality.

7.5 Impacts related to solid waste disposal

Impact Description

With the establishment of the cultural village, solid waste will be generated seeing that an increase in the number of people visiting the area is expected. There is currently almost no visible litter at the project site. It is essential that solid waste be managed effectively to prevent the pollution the area.

Mitigatory Measures

In the design of the residential units / campsites and the restaurant, the necessary measures should be taken to enable segregation of all solid waste in recyclable groups such as glass, plastic and paper. Recyclables and items together with any hazardous waste such as cooking and automotive oil should be transported to Usakos, Arandis or Swakopmund for re-use or proper disposal. Waste kept onsite should be contained and temporarily stored in a fenced area to prevent windblown litter Access to the waste storage site should be controlled.

Recycling of solid waste is a positive initiative and will minimise the amount of waste that goes to landfill. The storage site will mainly be used for domestic solid waste. Hazardous

wastes should always be properly contained and should be transported to proper disposal sites.

Furthermore, the following issues should be implemented:

- Promote the use of solid waste source reduction such recycling and re-use of products;
- Transport waste in bulk to an approved waste facility on a regular basis;
- Waste should be enclosed during transportation to prevent windblown litter.
- Adopt proper liquid waste reduction practices that are efficient in liquid waste disposal;
- Provide solid bins with lids to prevent litter from escaping into the environment;
- Legal reference: Atmospheric Pollution Prevention Ordinance 11 of 1976, Pollution Control and Waste management Bill, Hazardous substance Ordinance 14 of 1974;
- Segregation and store different types of waste in different containers;
- Plan and stock campsite material carefully to minimize amount of waste generated and avoid unnecessary generation of waste by doing careful checks before ordering;
- Buy items with minimal packaging;

8. Potential Environmental Impacts of the proposed Cultural Village

8.1. CRITERIA OF ASSIGNING SIGNIFICANCE TO POTENTIAL IMPACTS

Impacts are scored in terms of probability (likelihood of occurrence), extent (spatial scale), intensity (severity/magnitude) and duration. Impact significance is determined by summing the numerical value for the impact rating scales for each impact and multiplying by the probability of that impact occurring

8.2. POTENTIAL IMPACT OF EACH MAIN ACTIVITY IN EACH PHASE, AND CORRESPONDING SIGNIFICANCE ASSESSMENT

See Table 2, of Appendix 1A for impacts before and after mitigation measures have been implemented.

8.3. POTENTIAL IMPACTS PER ACTIVITY AND LISTED ACTIVITIES

The impacts that have been identified per activity are listed in the EMP Report Appendix 1A.

8.4. POTENTIAL IMPACT ON HERITAGE RESOURCES

No graves, archaeological or cultural sites have been identified on the site.

8.5. POTENTIAL IMPACTS ON COMMUNITIES, INDIVIDUALS OR COMPETING LAND USES IN CLOSE PROXIMITY

Because the area is remote and the proposed activity located far away from any neighbouring dwellings it is not anticipated to have any negative impacts on any communities or individuals in close proximity. The SCV occurs on land owned by the state, but the applicant has been given customary land rights by the Traditional Authority. There are also no impacts of this activity on any competing land use, this is because the activity will in no way compromise any of the existing activities taking place any adjacent properties. The SCT will however, have positive impacts on local communities in terms of employment and local economic development.

8.6. PROPOSED MITIGATION MEASURES TO MINIMISE ADVERSE IMPACTS.
Refer to Table 2 and 3, of Appendix 1B.

9. Planned monitoring and performance assessment of the environmental management plan.

Environmental monitoring is the continuous evaluation of the status and condition of environmental elements, whereas, environmental auditing is the process of comparing the impacts predicted with those which have actually occurred during implementation. The key to a successful Environmental Management System (EMS) is regular monitoring to identify and implement corrective measures in a timely manner and independent auditing to evaluate successful compliance with environmental specifications and outcomes. The ultimate purpose of environmental monitoring and auditing is to confirm that all relevant programmes, legislation, laws and policies are adhered to and abided by and that the environmental specifications are being implemented in an effective and correct manner. Monitoring and auditing is intended to promote environmental best practice, ensure protection of resources and support sustainable development. An environmental monitoring checklist should be developed and must be in line with the EMP. A list of identified impacts requiring monitoring programmes is contained below.

9.1. List of environmental impacts requiring monitoring programmes

Soil	Erosion
	Loss of top soil
	Contamination
	Soil compaction
Ground and surface water	Pollution
Vegetation	Destruction
	Alien invasive species
Wildlife	Disturbance/Harm
	Restriction of movement
Climate	Atmospheric Emissions
Air Quality	Dust Generation
	CO and CO2 emissions
Traffic	Increased traffic and safety
Noise	Noise disturbance
Waste	Litter
	Sewage

9.2. Functional requirement for monitoring programme

Ongoing inspection by Manager (and/or Landowner) and monthly Inspections by the Environmental Control Officer (ECO). An Environmental Register must be kept on site recording complaints by the public, for monitoring results and the notification of emergencies and incidents

9.3. Roles and responsibilities for the execution of the monitoring programme

Whilst the Manager must undertake to monitor activities on a daily basis, and the ultimate responsibility for satisfying the monitoring requirements is the role of the SCV Manager, the SCV is responsible for ensuring compliance with all aspects of monitoring.

9.4. Committed time frames for monitoring and reporting

The appointed ECO will submit monthly reports to the owners on all of the above mentioned impacts requiring monitoring.

9.5. Non-Compliance

Failure by the contractor, operator and their staff and suppliers to comply with all relevant programmes laws, legislation, policies and mitigation measures laid out in this EMP must result in immediate action. This includes notifications, setting of timeframes to remedy the situation and in cases of continue negligence all site activities must be halted and possible legal actions.

10. Summary and Conclusions

The natural topography and the visual amenity of the area will be slightly altered as a result of human impacts prior and during the establishment phase. The benefits of the project is expected to out-weight the negative effects by improving the communities' quality of life.

It is in the best interest of the proponent to conserve as much as possible of the natural landscapes, vegetation, trees etc, because these features would be major tourist attractions.

It is the opinion of Pachyderm Environmental Consultants cc, as independent consultants that this project be approved. The primary function of this Management plan is to recommend mitigations applicable to the development.

Potential impacts received a general low ranking after mitigation and no residual impacts are anticipated for this project. The consultant suggests mitigation measures form part of the legal contract between MET and the Proponent. Concurrent rehabilitation measures must be adopted at all times.

Furthermore, it is recommend that:

- The proponent implements the mitigatory measure recommended in this report to ensure minimum impact to the environment.
- No solid or liquid waste will be dumped at the site. All waste shall be transported to an approved land fill site on Spitzkoppe, Usakos or Arandis.
- Incorporate the natural and cultural characteristics of the area such as conserving natural vegetation.

Pachyderm Environmental Consultants do not foresee any major detrimental effects with the envisaged development provided that all mitigation measures are fulfilled correctly. It is also imperative that Proponent ensures the mitigatory measures are incorporated and adhered to. It is therefore recommended that these mitigatory measures form part of a legal agreement between the relevant parties.

11. APPENDICES

11.1. APENDIX 1A (Impact Assessment)

Impact Assessment

To ensure uniformity, the impacts are addressed in a standard manner so that their significance can be compared. Each impact is identified in terms of probability (likelihood of occurring), extent (spatial scale), intensity (severity) and duration (temporal scale). Each rating scale is assigned a numerical value and the sum of the numerical rating is multiplied by the probability of that impact occurring to give the resulting significance of the impact. The numerical values used for each rating scale are presented in the tables below.

Nature of impact

A brief description of the type of impact the proposed development will have on the affected environment.

Extent/Scale

The physical extent of the impact.

- i. Footprint

The impacted area extends only as far as the actual footprint of the activity.

- ii. Site

The impact will affect the entire or substantial portion of the site/property.

- iii. Local

The impact could affect the area including neighbouring properties and transport routes.

- iv. Regional

Impact could be widespread with regional implication.

- v. National

Impact could have a widespread national level implication.

Duration

The duration of the impact.

- i. Short term

The impact is quickly reversible within a period of one year, or limited to the construction phase, or immediate upon the commencement of floods.

- ii. Medium term

The impact will have a short-term lifespan (project lifespan 1 – 10 years).

- iii. Long term

The impact will have a long-term lifespan (project lifespan > 10 years).

- iv. Permanent

The impact will be permanent beyond the lifespan of the development.

Intensity

This criterion evaluates intensity of the impact and are rated as follows

- i. Minor

The activity will only have a minor impact on the affected environment in such a way that the natural processes or functions are not affected.

- ii. Low

The activity will have a low impact on the affected environment

- iii. Medium

The activity will have a medium impact on the affected environment, but function and process continue, albeit in a modified way.

- iv. High

The activity will have a high impact on the affected environment which may be disturbed to the extent where it temporarily or permanently ceases.

- v. Very high

The activity will have a very high impact on the affected environment which may be disturbed to the extent where it temporarily or permanently ceases.

Probability

This describes the likelihood of the impacts actually occurring.

- i. Improbable

The possibility of the impact occurring is highly improbable (less than 5% of impact occurring).

- ii. Low

The possibility of the impact occurring is very low, due either to the circumstances, design or experience (between 5% to 20% of impact occurring).

- iii. Medium

There is a possibility that the impact will occur to the extent that provision must be made therefore (between 20% to 80% of impact occurring).

- iv. High

There is a high possibility that the impact will occur to the extent that provision must be made therefore (between 80% to 95% of impact occurring).

- v. Definite

The impact will definitely take place regardless of any prevention plans, and there can only be relied on migratory actions or contingency plans to contain the effect (between 95% to 100% of impact occurring).

Determination of significance

Significance is through a synthesis of the various impact characteristics and represents the combined effect of the extent, duration, intensity and probability of the impacts.

- i. No significance

The impact is not substantial and does not require any mitigatory action.

- ii. Low

The impact is of little importance, but may require limited mitigation.

- iii. Medium

The impact is of importance and therefore considered to have a negative impact. Mitigation is required to reduce the negative impacts to acceptable levels.

- iv. High

The impact is of great importance. Failure to mitigate, with the objective of reducing the impact to acceptable levels, could render the entire development option or entire project proposal unacceptable. Mitigation and management is essential.

The following assessment scale is used to deter the significance of the identified potential impacts on the environment.

Significance = (probability + duration + scale) x intensity

Probability: 1 – 5

Extent: 1 – 5

Duration: 1 – 4

Intensity: 1 – 10

Significance rating criteria

>75 High environmental significance	High Environmental Significance
50 – 75 Medium environmental significance	Medium Environmental Significance
<50 Low environmental significance	Low Environmental Significance

The potential impacts of Sand Eco-Lodge activity are tabulated below. The impacts are assessed in the Table below.

11.2. APPENDIX 1B (Impact Rating)

1.1. Soil

Nature	Phase	Type	Extent	Duration	Intensity	Probability	WOM	Mitigation	WM
1. Soil Pollution	C	Negative	Local	Short	High	Medium	High	<p>1. Should diesel or any other chemical be stored on site, it will need to be stored on a hard surface and 100m away from any drainage lines.</p> <p>2. Repairs done to construction vehicles should be conducted on hardened surfaces.</p> <p>3. Under no circumstances should oil, diesel or any other chemical be disposed of at the site.</p> <p>4. Mobile toilet facilities should be made available to workers</p> <p>A Spill Contingency Plan should be adopted.</p>	Low
	O	Negative	Local	Short	High	Medium	High		Low
2. Soil Compaction	C	Negative	Local	Short	Medium	Medium	Medium	<p>1. Where roads have become compacted, they shall be ploughed, ripped and re-vegetated.</p>	Low
	O	Negative	Local						Low
3. Soil Erosion	C	Negative	Site	Long	High	High	High	<p>1. On any areas where the risk of erosion is evident, special measures may be necessary to stabilise these areas and prevent erosion.</p> <p>2. There needs to be minimal vegetation clearance and exposure of soils</p>	Medium
	O	Negative	Site	Long	High	High	High		Medium
4. Loss of top soil	C	Negative	Site	Long	Medium	Medium	High	<p>1. Stockpiled topsoil should be used as the final cover for all disturbed areas where re-vegetation is required</p> <p>2. Stockpiled soil should be protected by erosion-control berms if exposed for a period of greater than 14 days during the wet season</p>	High
	O	Negative	Site	Long	Medium	Medium	High		High

1.2. Water quality and quantity

Nature	Phase	Type	Extent	Duration	Intensity	Probability	WOM	Mitigation	WM
1. Pollution of groundwater/ surface water	C	Negative	Local	Long	High	Medium		1. Chemical toilets must be provided by the contractor in accordance with DWS requirements. 2. Machine maintenance of the equipment to be done on an impermeable surface. 3. Watercourses must be avoided during construction 4. Hazardous substances must be stored away from the buffer areas surrounding any water bodies on site to avoid pollution	Low
	O	Negative	Local	Short	Medium	Medium			Low
2. Stormwater runoff on site	C	Negative	Site	Medium	Medium	High		1. Protect area from erosion due to stormwater drainage 2. Collect and use stormwater runoff whenever possible 3. See Stormwater Management Plan (Low
	O	Negative	Site	Medium	Medium	High			Low
3. Water quantity	C	Negative	Site	Medium	Medium	High		1. Place water saving measures in place 2. Limit the wastage of water	Low
	O	Negative	Site	Medium	Medium	High			Medium

1.3. Fauna and Flora

Nature	Phase	Type	Extent	Duration	Intensity	Probability	WOM	Mitigation	WM
1. Impact on faunal activity	C	Negative	Local	Short	Medium	Medium	High	1. No trapping, snaring, hunting, fishing or killing of any animal may occur. 2. Any malicious damage to any fauna species present on site will	

	O	Negative	Local	Short	Medium	Medium	High	be considered a punishable offence, and the appropriate measures will be followed. 3. Limit the clearing of vegetation, removal of logs, rocks etc	Medium
2. Impact on vegetation	C	Negative	Site	Short	Medium	Medium	High	1. During the construction phase workers must be limited to areas under construction and avoid buffer areas 2. Limit the removal of vegetation. 3. Prevent illegal removal of protected vegetation 4. Minimise disturbance and loss of topsoil. 5. Keep surrounding vegetation, especially larger trees and shrubs, to create a screen that reduces flood impacts. 6. Remove Invasive alien species on site	Medium
	O	Negative	Site	Short	Medium	Medium	High		Medium

1.4. Noise

Nature	Phase	Type	Extent	Duration	Intensity	Probability	WOM	Mitigation	WM
1. Impact on faunal activity	C	Negative	Site	Medium	Medium	High	High	1. Noise levels must be kept within acceptable limits 2. Noise suppression measures must be applied to all construction equipment 3. During operation the site must implement noise control measures such as no loud music or other noise disturbance	Low
	O	Negative	Site	Medium	Medium	High	High		Low

	O	Negative	Site	Short	Minor	High	Medium		
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1.8. Solid Waste and sewage disposal

Nature	Phase	Type	Extent	Duration	Intensity	Probability	WOM	Mitigation	WM
1. Waste disposal	C	Negative	Local	Local	Medium	Medium	Medium	1. Ensure sustainable waste management practises are in place 2. Implement recycling 3. Bins must be provided on site and coded 4. Littering by the construction workers shall not be allowed 5. Raw Sewage may not be disposed of in the dam or Msunduzi River	Low
	O	Negative	Local	Local	Medium	Medium	Medium		Low

1.9. Social

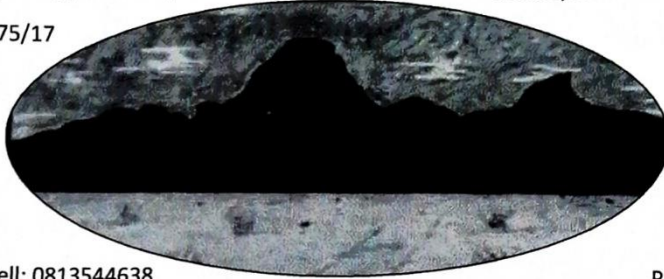
Nature	Phase	Type	Extent	Duration	Intensity	Probability	WOM	Mitigation	WM
2. Social	C	Positive	Regional	Long	Long	Long	None	None	None
	O	Positive	Regional	Long	Long	Long			

11.3. **APPENDIX 2 (Spitzkoppe Development Trust)**

Spitzkoppe Development Trust

developmentturst@gmail.com

T75/17



Cell: 0813544638

P.O Box 321 Usakos

Date: 9 October 2018

To: Whom it may concern

RE: Letter of consent for Spitzkoppe Traditional Village


Consent is hereby given by Spitzkoppe Development Trust representing Spitzkoppe and area community that we have no objections for building a traditional village outside Spitzkoppe mountains.

It is in the best interest of the local community and tourists regarding job creation, development and expeditions of our traditions and culture to the international community. To sustain and maintain the village as named; Spitzkoppe Cultural Village, relevant businesses such as Campsites, Restaurant, Bar and Tented camps as explained by the initiators are also approved.

Yours Faithfully

Fredrieka Gariseb – Vice Chairperson SDT

Cell no: 0813304543



Spitzkoppe Development Trust
No. T 75/17
P.O.Box 321, Usakos
Cell: 081 354 4698

11.4. APPENDIX 3 (Consent Letter Conservancy)



Strive for community upliftment through conservation.

P.O. Box 114 Usakos Namibia email :gainguconservancy17@gmail.com

25 October 2019

Headman: Benjamin Naruseb

Po box 231

Usakos



TO WHOM IT MAY CONCERN

The conservancy committee has given its consent based on:

We acknowledge that culture and tradition of the !Oe #an community in Spitzkoppe has to be practice and showcased for future generation to know the norms and origins of their culture and traditions, further more it must be used to strengthen the livelihood of the community through performances for visiting tourist.

Therefore Spitzkoppe Cultural Village is the best platform for Culture and tradition of !Oe #an community to be practice, recognize and known throughout the world.

Thus the committee has no objection in Spitzkoppe Cultural Village to be built at Spitzkoppe.

Yours in community Development

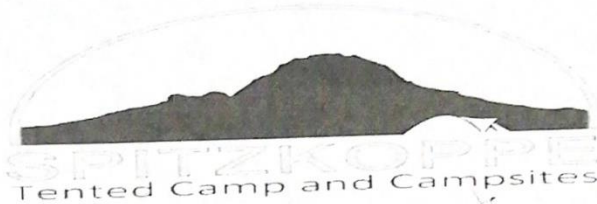
Chiron Byl (Chairlady)

Page 1 of 2

Tron Gawub (vice Chair)



11.5. APPENDIX 4 (Consent Letter Spitzkoppe Tented Camp)



Private bag 1004 Usakos Namibia +264818053178 enquiries@spitzkoppemountaincamp.com

Date: 22 October 2019

To: Benjamin Naruseb and Partners
Spitzkoppe Cultural Village
P/Bag 1004
Usakos

RE: Consent to set up Cultural Village.

Dear Sir

This Letter serves to confirmed that we the owners and management Spitzkoppe Tented Camp and Campsite gave our consent to your company Spitzkoppe Cultural Village cc to set up a cultural village on portion land situated between Spitzkoppe Rest Camp and Spitzkoppe Tented Camp.

We welcome this development as it will create additional activity for our customers and most importantly employment for community members.

Please note that we might also lay out a road through your area for our customers to access the mountain area.

Wish you a successful business venture

Yours sincerely


Lesley Tjongarero
Owner/manager

SPITZKOPPE TENTED CAMP

LUXURY TENTS & CAMPSITES

P/BAG 1004 USAKOS

enquiries@spitzkoppemountaincamp.com

cell:+264 81 805 3178

NTB REG: TNC 01015

11.6. APPENDIX 5 (Consent Letter Traditional Authority)



Spitzkoppe Cultural Village
Benjamin Naruseb and Samuel Richard Narib
P.O Box 305
Usakos

20th February 2018

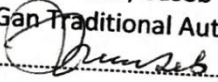
Hereby !Oe#Gan Traditional Authority under the chieftaincy of Chief Immanuel #Nu-Axa /Gaseb give concern to Spitzkoppe Cultural Village and that I don't have any object against their proposed Cultural village at Spitzkoppe.

It is in the interest of the community and Namibia to promote our cultures and traditions to wide world. It also aims at creating jobs and create social upliftment of the community.

The site is known to me and do not interfere with anything. The exact size is not known but is estimated at 10-15 hectares.

Do not hesitate to contact me in any regard.

Yours faithfully
Chief Immanuel /Gaseb
!Oe#Gan Traditional Authority





11.7. APPENDIX 6 (Consent Letter Spitzkoppe Rest Camp)

Quiver Tree Investment 38cc

P.O Box 65, Usakos

Tel: +264 62 568936

Fax: +264 62 569001

www.spitzkoppe.com



06 July 2019

HEADMAN BENJAMIN NARUSEB & SAMUEL RICHARD NARIB
SPITZKOPPE VILLAGE
NAMIBIA

Dear Sir,

RE: REQUEST FOR CONSENT TO BUILD AND OPERATE A CULTURAL/TRADITIONAL VILLAGE

Our site visit on Monday 10 September 2018 refers.

I, Ronnie Barnard the undersigned, hereby give consent to you to build and operate a cultural/Traditional Village without any form of accommodation or Camping and restaurant or bar in the area as per map attached.

All structures will be strictly as per the culture of the Damara people of Namibia. No sink and steel structures will be allowed.

No direct pedestrian access will be allowed between the Rest Camp and the Cultural/Traditional Village. Vehicular access will be via a newly constructed road from the D1925, not to interfere with the existing access to the Rest Camp Gate.

Consent granted to the following activities:

- Cultural and Traditional performances through dances and songs
- Traditional food and medicine
- Storytelling and
- Exhibitions through photos, pictures and visual objects
- **ONLY DAY VISITORS WILL BE ACCOMMODATED.**

No disturbing noise and music will be allowed after 22h00. All services (water and electricity) provision as per the Environmental Act of 2007.

Sincerely yours

A handwritten signature in black ink, appearing to read 'Chr Barnard', is written over a faint horizontal line.

.....
CHR BARNARD (sole member)