

**IMPLEMENTATION OF AND COMPLIANCE WITH THE ENVIRONMENTAL
MANAGEMENT PLAN FOR THE &BEYOND SOSSUSVLEI DESERT LODGE,
GIBEON CONSTITUENCY, HARDAP REGION, NAMIBIA**

APP-001464



Source: Andrew Schoeman

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ABBREVIATIONS / ACRONYMS / SYMBOLS / UNITS

The following is a list of the abbreviations, acronyms, symbols, and units used in this Report:

AIDS	Acquired Immunodeficiency Syndrome
CARS	Civil Aviation Regulations
CATS	(Namibian) Civil Aviation Technical Standards
CIS	Consumer Installation Certificate
CSR	Corporate Social Responsibility
DEA	Department: Environmental Affairs
DWA	Department of Water Affairs
EAP	Environmental Assessment Practitioner
EAPAN	Environmental Assessment Professionals of Namibia
ECC	Environmental Clearance Certificate
EIA	Environmental Impact Assessment
EMA	Environmental Management Act
EMP	Environmental Management Plan
FAO	Food and Agriculture Organization
FSMS	Food Safety Management System
GN	Government Notice
GRN	Government of the Republic of Namibia
ha	hectare
HACCP	Hazard Analysis Critical Control Points
HIV	Human Immunodeficiency Virus
HVAC	Heating, Ventilation, and Air Conditioning
I&APs	Interested and Affected Parties
IEMA	Institute of Environmental Management and Assessment
IFC	International Finance Corporation
ISO	International Organization for Standardization
IWM	Integrated Waste Management
kVA	kilo Volt-Ampere
l	litre
m	metre
m ²	square metre
m ³	cubic metre
MAWF	Ministry of Agriculture, Water and Forestry / Ministry of Agriculture, Water, and Land Reform
MET	Ministry of Environment and Tourism
MEFT	Ministry of Environment, Forestry and Tourism
MFMR	Ministry of Fisheries and Marine Resources
MME	Ministry of Mines and Energy
MOHSS	Ministry of Health and Social Services
MSDS	Material Safety Data Sheet
NaDEET	Namib Desert Environmental Education Trust
NCE	Namibia Chamber of Environment
NRAC	NamibRand Desert Research and Awareness Centre
NRCF	NamibRand Conservation Foundation
NRNR	NamibRand Nature Reserve
NTB	Namibia Tourism Board
PM	Particulate Matter
PPE	Personal Protective Equipment
PV	Photovoltaic
SA	South Africa
SEA	Strategic Environmental Assessment
SHE	Safety, Health and Environment
STIs	Sexually Transmitted Infections
T/A	Trading As
UK	United Kingdom
UNAM	University of Namibia
VOC	Volatile Organic Compound
WHO	World Health Organization

1 Introduction

1.1 Background

Afro Ventures Namibia (Pty) Ltd is a Namibian Company (Reg. No: 88/167) Trading As (T/A) &Beyond Sossusvlei Desert Lodge.

The &Beyond Group owns and/or manages permanent and mobile lodges in Africa (Botswana, Kenya, Mozambique, Namibia, South Africa, and Tanzania); the &Beyond Group acts as a destination management company (i.e. it facilitates bookings) on behalf of guests wishing to travel to Rwanda, Uganda, and Zambia (Africa), Asia (Bhutan, India, Maldives, Nepal, and Sri Lanka) and South America (Chile and Argentina) (see www.andBeyond.com). The Sossusvlei Desert Lodge was taken over by the &Beyond Group in 2001.

The &Beyond Sossusvlei Desert Lodge is located on Farm Vreemdelingspoort No. 141 (~20,000 hectares (ha) in size (see Figure 1); the Farm is located within the NamibRand Nature Reserve (NRNR)), Gibeon Constituency, Hardap Region, Namibia. Access to the &Beyond Sossusvlei Desert Lodge can be attained via the C27 Main Gravel Road between Sesriem and Betta.

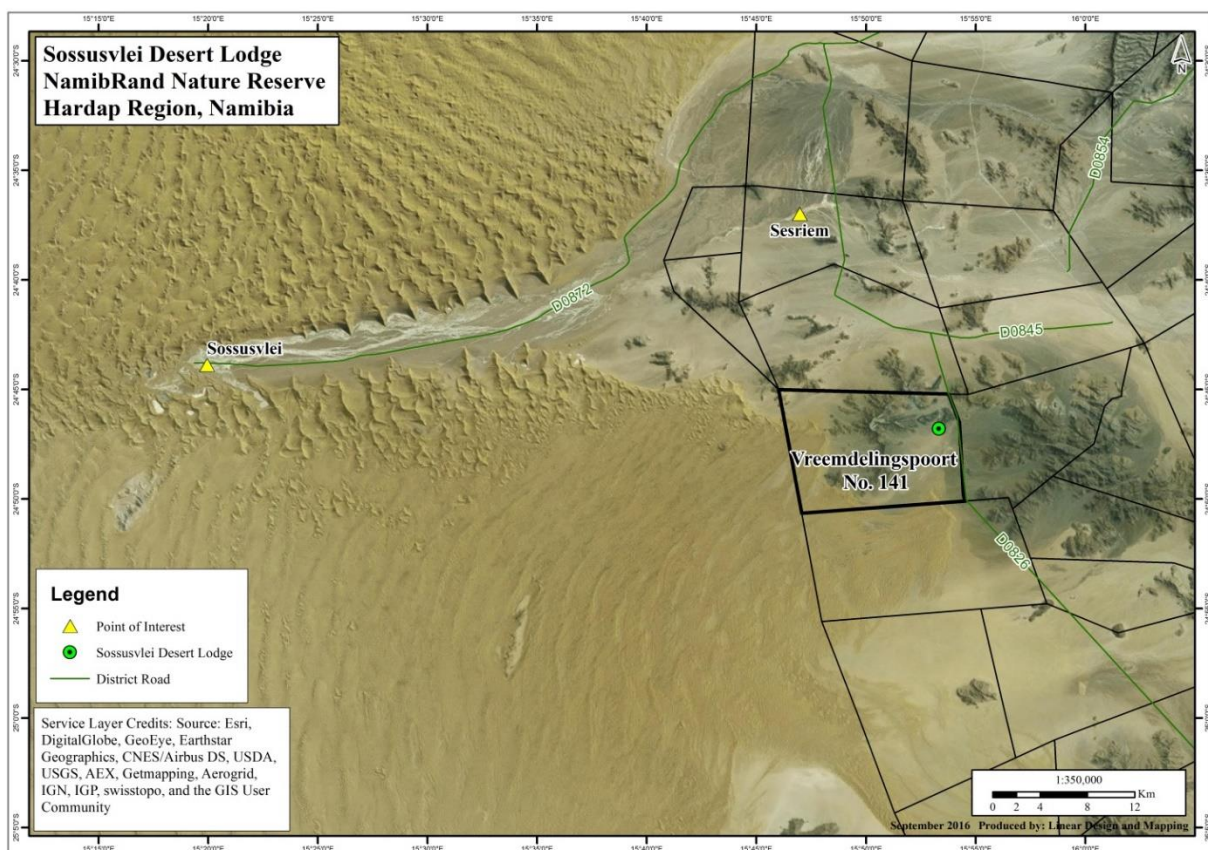


Figure 1: Map showing the location of the &Beyond Sossusvlei Desert Lodge on Farm Vreemdelingspoort No. 141, Gibeon Constituency, Hardap Region, Namibia (Source: Linear Design & Mapping, September 2016).

The NRNR, one of the largest private conservation areas in Africa, was established in 1992. The Reserve, consisting of 16 (now 15) former livestock farms and covering an area of approximately 215,000 ha, borders the Namib-Naukluft National Park. In 2001, all the Farm Owners signed an agreement that set aside their Farms for conservation. The Farm Owners still hold the title deeds, but they relinquished their individual management rights and instead serve as directors on the NamibRand Reserve's managing board. NamibRand has since become a self-sustaining, non-for-profit organisation that derives its income from park fees paid by visitors. The NamibRand Conservation Foundation (NRCF) was subsequently established. The

Foundation funds special projects (e.g. investigating the area's history and archaeology) and supports the NamibRand Desert Research and Awareness Centre (NRAC), as well as the Namib Desert Environmental Education Trust (NaDEET) (Jackson, 2009/2010; also see <http://www.namibrand.org/index.html>; Murray Tindall, Control Warden, NamibRand Nature Reserve, pers. comm.).

Note that Afro Ventures Namibia (Pty) Ltd T/A &Beyond Sossusvlei Desert Lodge broke away from the Reserve towards the end of 2019. The property is still managed according to the same principles and guidelines (as to when Afro Ventures Namibia (Pty) Ltd was still a part of the NRNR); however, Afro Ventures Namibia (Pty) Ltd has since taken a more active role in the management of the land (Mr Andrew Schoeman, Back of House Manager &BEYOND, pers. comm.).

In line with the Commencement of the Environmental Management Act (EMA), 2007 (Act No. 7 of 2007) (06 February 2012; Government Notice (GN) No. 28), the Listed Activities that may not be undertaken without an Environmental Clearance Certificate (ECC) (GN No. 29), and the Environmental Impact Assessment (EIA) Regulations (GN No. 30) (Government of the Republic of Namibia (GRN), 2012), Afro Ventures Namibia (Pty) Ltd T/A &Beyond Sossusvlei Desert Lodge applied to the Office of the Environmental Commissioner, Ministry of Environment and Tourism (MET; now Ministry of Environment, Forestry and Tourism (MEFT)) for an ECC on 12 October 2016. The ECC was granted by the Office of the Environmental Commissioner on 19 January 2017 (see Annexure A). The ECC has since expired (19 January 2020).

1.2 Terms of Reference

LM Environmental Consulting was appointed by Afro Ventures Namibia (Pty) Ltd T/A &Beyond Sossusvlei Desert Lodge in May 2020 to prepare a report, illustrating the implementation of and compliance with the Environmental Management Plan (EMP) (see Maartens, 2016), in aid of the application for the renewal of the ECC for the &Beyond Sossusvlei Desert Lodge.

Note that as no Bi-Annual Environmental Reports have been submitted by &Beyond Sossusvlei Desert Lodge staff / external consultant(s), an EMP Audit Report is required (in order to apply for the renewal of the ECC) (Mr. Hiskia Mbura, Senior Conservation Scientist, Department: Environmental Affairs (DEA), Sub-Division: Environmental Assessment, pers. comm., 18 May 2020).

1.3 Environmental Assessment Practitioner

The author of this Report is Dr Lima Maartens who has more than 27 years' experience in natural resource management (she gained her doctorate (Ph.D.) in Fisheries Science from Rhodes University, South Africa (SA) while working for the Namibian Ministry of Fisheries and Marine Resources (MFMR) in 2000, lecturing (University of Namibia (UNAM)), environmental science and management (De Beers Marine Namibia and the Canadian Forsys Metals Corp), and consulting). Dr Maartens is registered as a Lead Practitioner and Reviewer with the Environmental Assessment Professionals of Namibia (EAPAN) (she served on the Executive Committee during 2016/17), an Associate Member and Environmental Auditor with the Institute of Environmental Management and Assessment (IEMA) in the United Kingdom (UK), an Associate Member of the Namibia Chamber of Environment (NCE), and a Member of the Namibia Scientific Society. LM Environmental Consulting was established by Dr Maartens in October 2009.

2 &Beyond Sossusvlei Desert Lodge Upgrade

2.1 Infrastructure

Note that during February/March 2019, &Beyond Sossusvlei Desert Lodge was closed for renovations (see below); the Lodge re-opened for guests in October 2019 (Mr Andrew Schoeman, Back of House Manager &BEYOND, pers. comm.).

A 1,410 by 10 metre (m) private airfield (gravel) can be found on Farm Vreemdelingspoort No. 141 (see Figure 2). The airfield is operated by PPR &Beyond Africa. Aircraft may land or take off twice per day; the biggest aircraft that can make use of the airfield is the PC12 Pilatus, and the smallest aircraft is the Cessna 210. No re-fuelling of aircraft takes place at the airfield (see Maartens, 2016).

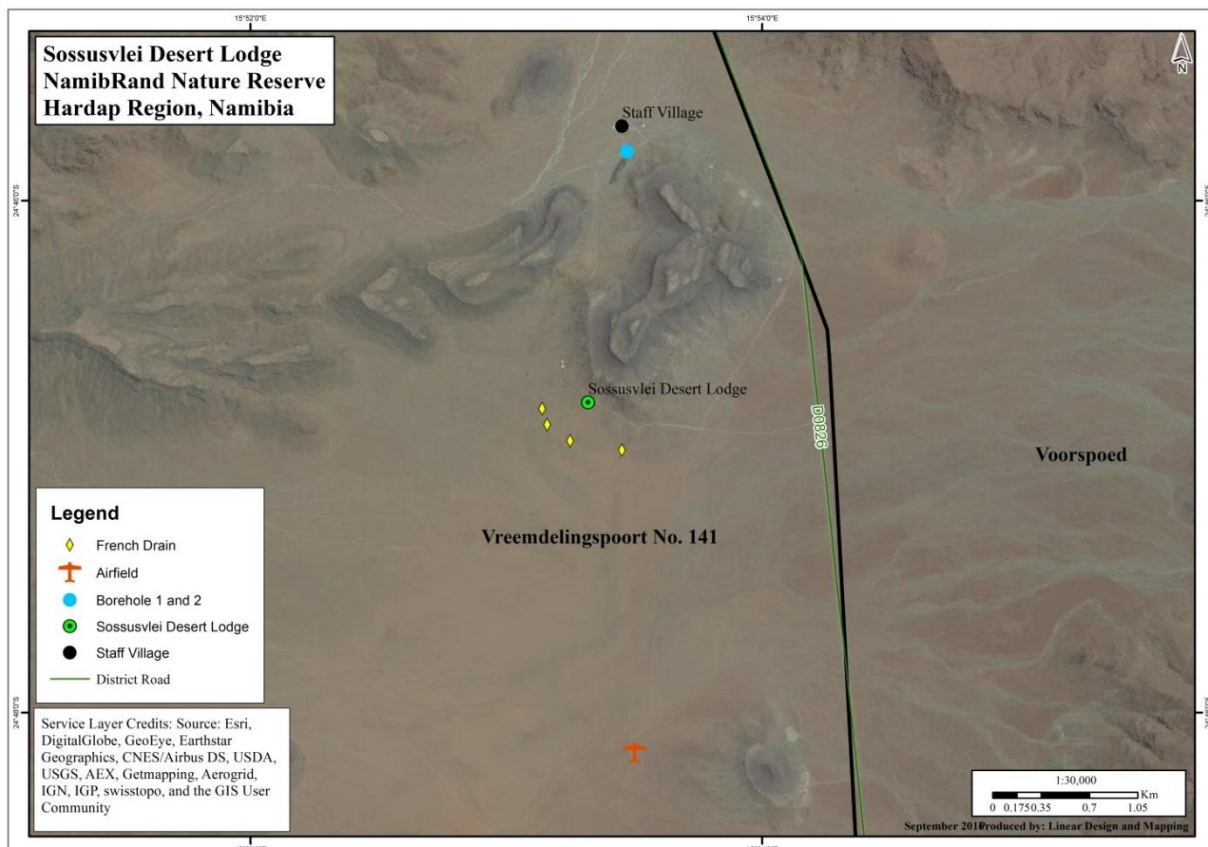


Figure 2: Map showing the location of the &Beyond Sossusvlei Desert Lodge, the airfield, the septic tank/French drain system, the Staff Village, and the location of the two boreholes, Farm Vreemdelingspoort No. 141 (Source: Linear Design & Mapping, September 2016).

The &Beyond Sossusvlei Desert Lodge itself consists of the following infrastructure/facilities:

- Main building: Reception; Safari Shop; Lounge; Dining Room; Bar; TV Room; and Veranda; this area have been re-designed and changed, but the footprint is essentially the same (Mr Andrew Schoeman, Back of House Manager &BEYOND, pers. comm.; see Figure 3);
- A Swimming Pool (see Figure 4);
- An Observatory; and
- Twelve Guest Suites; since 2016, two additional Guest Suites were built and the other ten Suites were refurbished and updated (Mr Andrew Schoeman, Back of House Manager &BEYOND, pers. comm.; see Figure 5).



a)



b)



c)



d)



e)



f)

Figure 3: Pictures showing: a) main area overall view; b) main area outside view; c) main area reception; d) main area lounge; e) main area bar; and f) main area dining (Source: Mr Andrew Schoeman, Back of House Manager & BEYOND).



Figure 4: Pictures showing: a) main area top floor view; and b) swimming pool (Source: Mr Andrew Schoeman, Back of House Manager & BEYOND).



Figure 5: Pictures showing: a) guest suites 1 to 5; and b) guest suites 6 to 12 (Source: Mr Andrew Schoeman, Back of House Manager & BEYOND).

All Guest Suites now have swimming pools (Mr Andrew Schoeman, Back of House Manager & BEYOND, pers. comm.; see Figure 6).



Figure 6: Pictures showing: a) guest suite pool; and b) guest suite view from the pool (Source: Mr Andrew Schoeman, Back of House Manager & BEYOND).

Additional accommodation facilities include: a pilot/guide suite with a shower, basin and toilet; a suite for manager(s) (with bath, shower, basin, and toilet); two bachelor units (with shower, basin, and toilet); and a suite (for Observatory staff) with a shower, two basins, and a toilet (see Maartens, 2016).

At the Staff Village, the following infrastructure can be found:

- Accommodation facilities for staff (see Figures 7a and b);
- Three 10,000 litre (l) water storage tanks (see Figure 7d) (an additional five 10,000 l water storage tanks supply the Lodge itself);
- A workshop; since 2016, the workshop has been upgraded with store rooms (see Figure 7c);
- Three store rooms and two containers (used for storage);
- A Consumer Fuel Installation (a Consumer Installation Certificate (CIS) was granted to Gold Venture Lodges (Pty) Ltd by the Ministry of Mines and Energy (MME) in July 2002. Fuel (~15,000 litres) is delivered to &Beyond Sossusvlei Desert Lodge by LVW Boerediens in Mariental once a month (see Maartens, 2016). The fuel is stored in two, bunded fuel tanks (23,000 litres), one at the Staff Village and one at the Lodge;
- The Staff Village is powered by a new 80 kilo Volt-Ampere (kVA) generator; and
- Two boreholes (see Figure 2; water is abstracted from one borehole only) (see Maartens, 2016; Mr Andrew Schoeman, Back of House Manager &BEYOND, pers. comm.).



Figure 7: Pictures showing: a) and b) staff village accommodation; c) staff village workshop and stores; and d) staff village water tanks (Source: Mr Andrew Schoeman, Back of House Manager &BEYOND).

2.2 Engineering Services

Upgrades as far as the water and power supply and the treatment of sewage and waste is concerned, is dealt with under the Environmental Management Plan (EMP; see Table 1).

3 Environmental Management Plan: Implementation and Compliance

3.1 Introduction

As part of the EMP performance review, the following actions were carried out:

- Review of documentation/photographs supplied by Mr Andrew Schoeman, Back of House Manager &BEYOND;

Note that the &Beyond Sossusvlei Desert Lodge is in possession of / is a member of / was awarded: &Beyond Safety, Health and Environmental Policy (February 2013); &Beyond HIV/AIDS Policy Statement (May 2019); Certificate of Fitness, Ministry of Health and Social Services (MOHSS) (26 February 2020 till 31 March 2021); Kitchen – HACCP (Hazard Analysis Critical Control Points) *Best Operating Practices* (April 2020); Certificate of Registration for Accommodation Establishment, Namibia Tourism Board (NTB) (since 01 May 2005); &Beyond Sossusvlei Desert Lodge is featured in the US Condé Nast Traveller's Hot List (2001); &Beyond Sossusvlei Desert Lodge is #21 in the US Condé Nast Traveller Readers' Choice Awards Top 30 Resorts & Camps (Africa & Middle East) (October 2007); &Beyond Sossusvlei Desert Lodge is #21 in the Condé Nast Traveller (US) Readers' Choice Awards 2007 Top 30 (Africa & Middle East) (November 2008); &Beyond Sossusvlei Desert Lodge is listed in the Smart Luxury Awards by Sherman's Travel (December 2010); &Beyond Sossusvlei Desert Lodge becomes Namibia's first Virtuoso Property (November 2012); &Beyond Sossusvlei Desert Lodge is awarded a TripAdvisor Certificate of Excellence (December 2012); &Beyond Sossusvlei Desert Lodge is #69 in International Traveller's 100 Best Hotels and Resorts in the World (September 2013); &Beyond Sossusvlei Desert Lodge is Namibia's Leading Safari Lodge at the World Travel Awards 2016 (April 2016) (see Maartens, 2016); &Beyond Sossusvlei Desert Lodge made it into Condé Nast Traveller Magazine as the best new property in Namibia (2020); and &Beyond Sossusvlei Desert Lodge made the cover of Visi Magazine (early-2020) (see Maartens, 2016; Mr Andrew Schoeman, Back of House Manager &BEYOND, pers. comm.).

Upon arrival, guests to &Beyond Sossusvlei Desert Lodge are provided with six booklets containing the following sheets/information: Booklet 1: Telephone (relevant telephone numbers); Precious Water (urging guests to re-use towels); Activities; and Body Treatment Menu; Booklet 2: *In the Know Guest Information* containing information re: Out & About; In-Room; Arrival & Departure; Food; Children; Travel Arrangements; Conservation of Natural Resources; &Beyond Foundation; Safety; Communication; Climate; Safari Shop; Money; Safari Etiquette; and Local Culture; Booklet 3: Eco Guide Naturalist Notes containing information re: The Namib Desert; People and History; Landscape and Climate; Rocky Hillside; Sandy Plains; Dry River Beds; Dunes; Sossusvlei; Sesriem; Fairy Circles; List of Mammals, Reptiles and Frogs; List of Birds; List of Common Plants; and Further Reading; Booklet 4: *Winging It* Introduction to Birding; Booklet 5: Africa Foundation Pamphlet; and Booklet 6: Brochure containing information on all &Beyond's Lodges (see Maartens, 2016).

- A (telephonic) meeting (remote audit) was held (conducted) with Mr Andrew Schoeman at 08h30 on 03 June 2020.

3.2 Compliance: Environmental Management Plan

In order to illustrate compliance with the EMP (see Table 1), the following colour codes were applied:

	Compliance/Completed
	In Progress/Ongoing
	Non-compliance
	Not (Currently) Applicable
	Changes made to existing EMP

The EMP (see Maartens, 2016; also see International Finance Corporation (IFC), 2007a; b) is not a static document and the document should be updated as &Beyond Sossusvlei Desert Lodge's activities progress.

Table 1: Compliance with the Environmental Management Plan for the &Beyond Sossusvlei Desert Lodge, Farm Vreemdelingspoort No. 141, Hardap Region, Namibia.

Aspect	Impact	Mitigation & Management Measures	Compliance & Comments
Social and Environmental Performance: &Beyond Sossusvlei Desert Lodge			
Management and Monitoring	Social and Environmental Performance	<p>Adhere to all Namibian Legislation, including Best Practice Guidelines.</p> <p>Ensure that all aspects related to the Environmental Management Plan (EMP) are implemented, including the EMP for the NamibRand Nature Reserve (2007).</p> <p>Cognicance to be taken of: A Strategic Collaborative Management & Development Plan For Greater Sossusvlei – Namib Landscape 2013 – 2018; the Landscape Conservation Areas’ Law Enforcement Manual; and Strategic Environmental Assessment (SEA) Of The Tourism Sector For The Greater Sossusvlei Namib Landscape 2014 (see http://www.landscapesnamibia.org/sossusvlei-namib/our-approach).</p>	Ongoing. Note that the current Back of House Manager, Mr Andrew Schoeman, took over from Mr Grant Chambers, Back of House/Maintenance Manager in February 2020 (without any handover). Mr Chambers was previously in charge of the implementation of the EMP (Mr Andrew Schoeman, Back of House Manager &BEYOND, pers. comm.).
Consultation and Disclosure	Social and Environmental Performance	<p>Maintain open and direct lines of communication with the Authorities and Interested and Affected Parties (I&APs) (e.g. the Hardap Regional Council, the Ministry of Environment, Forestry and Tourism (MEFT), the Ministry of Health and Social Services (MOHSS), the Namibia Tourism Board (NTB), etc.) with regards to environmental matters.</p> <p>Consult with I&APs throughout the project process and adequately incorporate I&APs’ concerns.</p>	Ongoing.
Grievance Mechanism	Social and Environmental Performance	<p>Implement a grievance mechanism for receiving and resolving any concerns and grievances related to the project’s social and environmental performance throughout the project life cycle.</p> <p>Inform all I&APs about the mechanism.</p> <p>Address concerns promptly and transparently and in a culturally appropriate manner.</p> <p>Keep a register of all concerns/issues received from I&APs, as well as the measures taken to address these.</p>	<p>Ongoing. Guests are requested to fill out a form <i>DID WE CREATE AN EXTRAORDINARY EXPERIENCE FOR YOU?</i> Topics that are to be rated “not very good”, “fair”, “good” or “excellent” include: overall hospitality; accommodation; the food; housekeeping; the ranger/guide; overall wildlife experience; and overall impression of &BEYOND as a company which contributes to conservation and communities (documentation made available by Mr Andrew Schoeman, Back of House Manager &BEYOND).</p> <p>Shop Stewards act as the link between Management and Staff. Regular communication with the Unions also take place (Mr Andrew Schoeman, Back of House Manager &BEYOND, pers. comm.).</p>

Aspect	Impact	Mitigation & Management Measures	Compliance & Comments
Training, including awareness and inductions	Social and Environmental Performance	<p>Train employees in matters related to the project's social and environmental performance and Namibia's regulatory requirements.</p> <p>Ensure adequate environmental awareness training for all personnel.</p> <p>Give environmental induction presentations to all personnel.</p>	<p>Ongoing.</p> <p>New staff do receive inductions, i.e. do's and don'ts, where everything is, and how things operate (Mr Andrew Schoeman, Back of House Manager &BEYOND, pers. comm.).</p>
Employment and procurement opportunities	Social and Environmental Performance	<p>Source contracting companies/service providers/workers based on merit and expertise giving preference to local contractors/service providers/workers on condition that the local contractors/service providers/workers have the required experience and expertise.</p> <p>Consider utilising local labour for unskilled work and to then provide training to workers in order to perform semi-skilled work; this should be done under the supervision of managers/specialists to ensure maximum local beneficiation.</p> <p>Ensure that contractors/service providers adhere to the Namibian Labour, Social Security, Health and Safety, and Affirmative Action laws.</p> <p>Contracts to stipulate that all contractors/service providers have an HIV/AIDS Policy and Programme in place.</p> <p>Source maximally from local resources to ensure maximum economic beneficiation of local businesses in terms of new business sales.</p>	<p>Ongoing.</p> <p>&Beyond Sossusvlei Desert Lodge makes use of very few external companies/service providers/workers (Mr Andrew Schoeman, Back of House Manager &BEYOND, pers. comm.).</p>
Labour and Working Conditions	Social and Environmental Performance	<p>Establish, maintain and improve the worker-management relationship. Base the employment relationship on equal opportunity and fair treatment and no discrimination to be allowed.</p> <p>Comply with Namibia's labour and employment laws.</p> <p>Promote safe and healthy working conditions and the protection and promotion of worker health.</p> <p>Document and communicate the Working Conditions and Terms of Employment.</p>	<p>Ongoing.</p> <p>The &Beyond Sossusvlei Desert Lodge currently employs 55 people (27 males and 28 females). The staff originally comes from Maltahöhe, Windhoek and surrounds, and northern Namibia; staff work for six weeks at a time and then gets 16 days off.</p> <p>Most labour-related tasks are handled in-house; e.g. wage negotiations are done during a meeting with the following persons present: a Director from South Africa, the Regional Director, the General Manager, the</p>

Aspect	Impact	Mitigation & Management Measures	Compliance & Comments
		Respect Collective Agreements and the right of workers to organize and bargain collectively. Implement a Grievance Mechanism.	Shop Stewards, and Union Representatives. Issues that cannot be resolved in-house are referred to and handled by Mr August Awaseb, a Labour Lawyer (Mr Andrew Schoeman, Back of House Manager &BEYOND, pers. comm.).
Occupational and Community Health and Safety and Security	Social and Environmental Performance	Adhere to all Namibia's Health and Safety Regulations (Labour Act, 1992: Regulations Relating to the Health and Safety of Employees at Work).	Ongoing.
		Ensure that an HIV/AIDS Policy and Programme and Health and Safety Plan is in place.	Compliant and Ongoing. &Beyond is in possession of an HIV/AIDS Policy Statement (May 2019) and a very detailed Health and Safety checklist (documentation made available by Mr Andrew Schoeman, Back of House Manager &BEYOND). All health-related issues (e.g. Covid-19) is handled by the centralised &Beyond office in Johannesburg / the HR Director distributes awareness material (e.g. related to HIV/AIDS and Covid-19) to all the Lodges (Mr Andrew Schoeman, Back of House Manager &BEYOND, pers. comm.).
		A SHE (Safety, Health, Environment) Representative to be appointed once the staff complement reaches 20.	It is advised that &Beyond Sossusvlei Desert Lodge appoints a SHE Representative.
		Occupational Health and Safety Training to be provided to all employees.	Ongoing. First aid and firefighting training are provided to staff. It is advised that records be kept of all training provided.
		Ensure that qualified first aid can be provided at all times.	
		Comply with all safety regulations re. electricity supply.	
		Ensure that employees are trained in the use of appropriate fire fighting equipment and ensure that such equipment is on hand at all times. <i>Forty two serviced fire extinguishers are available (at the airfield, in the vehicles, at the Lodge, and at the Staff Village).</i>	All fire fighting equipment was serviced by LLEWELLYN Fire Fighting & Suppliers CC in October 2019 (documentation made available by Mr Andrew Schoeman, Back of House Manager &BEYOND).
		Provide and ensure the active use of Personal Protective Equipment (PPE).	Ongoing
Make suitable arrangements, as far as practicable, for the maintenance of health, the prevention and overcoming of outbreaks of disease and of adequate first aid services. Prevent communicable disease (e.g. Sexually Transmitted Infections (STIs) such as HIV transmission): provide surveillance and active screening and treatment of employees; prevent illness	Ongoing		

Aspect	Impact	Mitigation & Management Measures	Compliance & Comments
		among employees (through health awareness and education initiatives); ensure ready access to medical treatment, confidentiality and appropriate care, particularly with respect to migrant workers; and promote immunization.	
		Ensure that security arrangements are in place.	&BEYOND contracts Crown Security who places a security guard at the Lodge every night (Mr Andrew Schoeman, Back of House Manager &BEYOND, pers. comm.).
Corporate Social Responsibility (CSR)	Social and Environmental Performance	Maintain the existing CSR Programme.	Compliant and ongoing. Solar lamps/lanterns are sold (for N\$400) at the Safari Shop at &Beyond Sossusvlei Desert Lodge. Each of the lanterns sold, provides the funding to light up a home in the community (without access to electricity), as well as to feed 12 children for one day, or one child for 12 days. &Beyond Sossusvlei Desert Lodge currently feeds 600 children (vs 200 children in 2016), many of whom have been orphaned due to HIV/AIDS, at their feeding scheme for orphans and vulnerable children in Maltahöhe. The children are also provided with a mineral and vitamin enriched porridge five days a week, as well as fresh fruit three times a week (Mr Andrew Schoeman, Back of House Manager &BEYOND, pers. comm.).
&Beyond Sossusvlei Desert Lodge			
Operational activities	Negative impact on floral species	Avoid/prevent the planting of potentially invasive alien plant species for ornamental purposes as part of the landscaping (these species often “escape” and become invasive causing further ecological damage); rather incorporate indigenous vegetation into the overall landscaping of the area (this would create a natural ambiance and indigenous species require less water and overall maintenance). Promote appropriate guest and staff behaviour (e.g. do not allow any native plant species to be removed/damaged).	Ongoing.
Operational activities	Pollution of biophysical environment (surface and groundwater)	Fertilizers: Conduct regular soil testing (to establish nutrient needs) in order to determine fertilizer application rates/correct doses.	Ongoing. No fertilizers are used, only potting soil for the planting of some herbs, lettuce and spinach (back of house) (Mr Andrew Schoeman, Back of House Manager &BEYOND, pers. comm.).

Aspect	Impact	Mitigation & Management Measures	Compliance & Comments
		<p>Store fertilizers in their original packaging in a dedicated, locked area, with proper signage, and with access limited only to authorised personnel. Use slow-release and/or natural organic fertilizers. Manure can be an alternative, but if over applied it may also cause pollution. Prepare a management plan covering the measures for containment, storage and ultimate destruction of obsolete fertilizers in accordance to the Food and Agriculture Organization (FAO) guidelines (and consistent with country commitments under the Stockholm, Rotterdam and Basel Conventions).</p> <p><i>Note that it is planned to use the food scraps from the kitchen as compost for the gardens at the &Beyond Sossusvlei Desert Lodge.</i></p> <p><u>Pesticides:</u> Consider non-chemical methods (e.g. use beneficial organisms to perform the biological control of pests, or use mechanical controls, i.e. traps, barriers, light and sound to kill/relocate/repel pests, or use mechanical weed control/thermal weeding) before resorting to chemical application. Maintain a pesticide logbook: e.g. field observations, weather data, time and dosage of treatment, and effectiveness and apply pesticides based on these criteria. Ensure that only the minimum effective dose is applied. Avoid the use of pesticides that fall under the World Health Organization (WHO) Recommended Classification of Pesticides by Hazard Classes 1a and b, and by Hazard Class II. Also those that are listed in Annexes A and B of the Stockholm Convention (except under the conditions noted in the convention). Only use pesticides that are manufactured under license, registered and approved by the appropriate authority and in accordance with the FAO's International Code of Conduct on the Distribution and Use of Pesticides. Only use pesticides that are labeled in accordance with international standards and norms. Pesticide application equipment to be maintained and calibrated in accordance with manufacturer's recommendations. Store pesticides in their original packaging in a</p>	<p>It is advised that the organic waste from the kitchen be composted and used in the gardens.</p> <p>Delta 7 WP only is used for the control of mainly flies and mosquitos (Mr Andrew Schoeman, Back of House Manager &BEYOND, pers. comm.).</p>

Aspect	Impact	Mitigation & Management Measures	Compliance & Comments
		dedicated, dry, cool, frost-free, well aerated, locked area, with proper signage, and with access limited only to authorised personnel. Also ensure that spill containment measures are in place. Ensure that the personnel applying pesticides are properly trained; mixing and transfer of pesticides to be done in ventilated and well-lit areas using containers designed/dedicated for the task. Contaminated containers to be handled and treated as hazardous waste (see Hazardous materials management). Purchase and store only the required amounts of pesticides.	
&Beyond Sossusvlei Desert Lodge: Resource Use			
Energy Management	Resource use (e.g. coal) / depletion of natural resources	Promote the sustainable use of energy (that will result in the reduction of use and cost reductions) (e.g. energy efficient light sources).	Compliant and ongoing (see below).

Power for the &Beyond Sossusvlei Desert Lodge used to come from two 250 kilo Volt-Ampere (kVA) generators (supplying the Lodge) and one 125 kVA generator (supplying the workshop at the Staff Village) (see Maartens, 2016). At the moment, the Lodge is operated on between 60 and 65% solar power (see below) and has a new 250 KVA generator. The Staff Village is powered by a new 80 kVA generator (Mr Andrew Schoeman, Back of House Manager &BEYOND, pers. comm.).



Figure 8: Pictures showing: a) guest suite solar panels; b) solar panels above the office; and c) solar panels above the kitchen (Source: Mr Andrew Schoeman, Back of House Manager &BEYOND).

In October 2019, New Southern Energy (<https://www.newsouthernenergy.com/>) put up 57 Solar PV (Photovoltaic) panels (from Canadian Solar) on the roofs of the Guest Suites, the Office and the Kitchen (covering 1,131 square metres (m²) in total), as well as the associated infrastructure (e.g. 15 PV Inverters, two Tesla Powerpack Lithium Ion Batteries, etc.). The 57 PV modules has a nominal output of 199,51kWp; the batteries will have a total of 420kWh (kilowatt hours) per day. The life of the Solar PV structure is estimated at between 10 (Product Warranty) and 25 years (Linear Power Warranty) (Tesla Powerpack energy retention of ~80% capacity expected after 10 years, 70% after 15 years @ 1 cycle per day; SMA Inverters with approximate expected 10 years of life, and PV Panels with an expected ~80% of production after 25 years) (Mr Andrew Schoeman, Back of House Manager &BEYOND, pers. comm.).

Aspect	Impact	Mitigation & Management Measures	Compliance & Comments
Energy Management	Resource use (e.g. coal) / depletion of natural resources	Raise awareness amongst the residents, staff (and contractors).	Ongoing
		For reduction of energy consumption associated with heating, ventilation, and air conditioning (HVAC), lighting, and cooking and refrigeration equipment see IFC (2007b).	Ongoing. There is a qualified refrigerant technician at the Lodge that is responsible for basic maintenance and servicing of the equipment. There is also an ongoing servicing programme in place (Mr Andrew Schoeman, Back of House Manager &BEYOND, pers. comm.).
Water efficient design features	Resource use (water) / depletion of natural resources	Use, where feasible, water saving equipment including ultra-low flush toilets, spray nozzles, urinals, faucet aerators, and low-flow showerheads, infrared and ultrasonic sensors, water spigots, and pressure control valves.	See below.
Water Management	Resource use / depletion of natural resources	<p>Implement a water conservation program, promoting the continuous reduction in water consumption.</p> <p>Promote and enforce a policy on landscape and garden designs that minimise water consumption e.g. the use of indigenous plants.</p> <p>Raise awareness amongst the residents, staff (and contractors) re the importance of saving water.</p>	Compliant and ongoing (see below).
<p>Water for the &Beyond Sossusvlei Desert Lodge is obtained from one (of two) borehole(s) and stored in eight 10,000 litre (l) tanks (three tanks at the Staff Village and five tanks at the Lodge).</p> <p>Water from the showers and basins in the Guest Suites are collected and pumped into a Hydraloop water recycling system (see Figure 7a) that cleans the water. The recycled water gets stored in a 1,000 litre (l) tank (see Figure 7c) and this water is then used to fill the toilet cisterns, as well as the swimming pools.</p> <p>Each Guest Suite has a Hydratherm hot water heat pump (see Figure 7b; a similar system was installed at the Lodge kitchen) (Mr Andrew Schoeman, Back of House Manager &BEYOND, pers. comm.).</p>			

Aspect	Impact	Mitigation & Management Measures	Compliance & Comments
			

Figure 9: Pictures showing: a) guest suite Hydralooop water recycling system; b) guest suite recycled water storage; and c) guest suite Hydratherm hot water heat pump (Source: Mr Andrew Schoeman, Back of House Manager &BEYOND).

In 2016, the water abstraction and consumption figures were unknown (see Maartens, 2016). Water metres have since been installed: between the abstraction borehole and the first water tank; and before the Lodge-area is entered (to distinguish between what is used by the Lodge, and the back of house-area). Around 1,480 cubic metres (m³) of water was consumed on average per month between October 2019 and February 2020. A large portion of the water is used for the water trough in front of the Lodge (during the summer time, the more than 200 animals on the concession consumed around 8,000 l of water per day (including sun and wind evaporation)). Water consumption declined to 1,225 m³ in March 2020, 321 m³ in April 2020, and 257 m³ in May 2020 (due to the Covid-19 pandemic and Namibia's borders being closed) (Mr Andrew Schoeman, Back of House Manager &BEYOND, pers. comm.).

As the &Beyond Sossusvlei Desert Lodge does not fall within a Water Control Area (Water Act 54 of 1956 (as amended)), a water abstraction permit is not required. However, a **letter** is required from the Department of Water Affairs (DWA), Ministry of Agriculture, Water and Forestry (MAWF) (now Ministry of Agriculture, Water and Land Reform), stating that it is not a Water Control Area (and that the &Beyond Sossusvlei Desert Lodge may **abstract water for commercial purposes**) (see Maartens, 2016). Also, it is advised that &Beyond Sossusvlei Desert Lodge applies for a **wastewater reuse permit** from the Executive Director, Ministry of Agriculture, Water and Land Reform.

&Beyond Sossusvlei Desert Lodge: Hazardous Materials Management

Hazardous materials management	Social and Environmental Performance	Establish hazardous materials management priorities (based on hazard analysis of risky operations). Avoid, or minimize the use of hazardous materials. Prevent uncontrolled releases of hazardous materials to the environment or uncontrolled reactions that may result in fire or explosion. Implement management controls (procedures, inspections and training, communication and drills) to address residual risks.	Ongoing.
Hazardous materials management	Pollution of biophysical environment (soil and	Implement prevention and control measures for the use, handling and storage of hazardous materials:	Ongoing.

Aspect	Impact	Mitigation & Management Measures	Compliance & Comments
	water)	<p><u>Materials transfer</u>: regularly inspect, maintain and repair fittings/pipes/hoses; make use of drip trays/other drip containment measures at connection/possible overflow points;</p> <p><u>Overfill protection</u>: use trained filling operators; install gauges on tanks to measure the volume inside; make use of dripless hose connections (vehicle tanks) and fixed connections (storage tanks); use a catch basin/drip tray around the fill pipe to collect spills;</p> <p><u>Reaction, fire, and explosion prevention</u>: hazardous materials to be stored in marked containers and separate (from non-hazardous materials); incompatible hazardous materials (acids, bases, flammables, oxidizers, reactive chemicals) to be stored in separate areas and with containment facilities separating material storage; smoking or working with open flames not to be permitted in the presence of these substances; limit access to hazardous waste storage areas and clearly label and demarcate the area; conduct regular inspections of the areas and document the findings; prepare and implement spill response and emergency plans; train employees in the use of appropriate fire fighting equipment and ensure that such equipment is on hand at all times.</p> <p>Train workers on the correct transfer and handling of fuels and chemicals and the response to spills.</p> <p>Immediately report and clean up any accidental hydrocarbon spill: Sunisorb, Drizit, Peatsorb can be used to clean up small spills; in case of larger spills, the spill together with the polluted soil should be removed and disposed of at e.g. a biological remediation site.</p>	
Hazardous materials management	Occupational Health and Safety	<p>Implement hazard communication and training programmes (including information on Material Safety Data Sheets (MSDS)) to make employees aware of workplace chemical hazards and how to respond to these.</p> <p>Provide and ensure the active use of PPE.</p>	Ongoing.
&Beyond Sossusvlei Desert Lodge: Waste Management			
Waste management: non-hazardous and hazardous	Pollution of biophysical environment	Prepare an Integrated Waste Management Plan . The generation of waste should be avoided as far as	Ongoing.

Aspect	Impact	Mitigation & Management Measures	Compliance & Comments
		<p>practicable; where it cannot be avoided, waste should be reduced, re-used and recovered (including recycling and composting) (e.g. set up collection points for the recycling of solid waste; <i>note that it is planned to use the organic waste is used for composting</i>); where waste cannot be reduced, re-used and/or recovered, it should be disposed of in an environmentally sound manner.</p> <p>Waste reduction can be achieved by: buying in bulk quantities; using refillable, bulk dispensers (e.g. toiletries) (vs. individually packaged products); working with suppliers in order to limit the use of, and establishing recycling for, product packaging; avoiding the use of polystyrene foam altogether; using glass/durable plastic rather than disposable plastic items (straws/cups); providing in-room recycling procedures and appropriate receptacles.</p> <p>Raise awareness amongst residents, staff and contractors (to reduce, recycle and reuse waste).</p> <p>Stamp down on any form of littering.</p> <p>Non-hazardous and hazardous waste to be collected and stored separately.</p> <p>Hazardous waste: recycle petroleum (fuels and lubricants) waste products and collect and recycle batteries and print cartridges. The remainder to be transported by an approved contractor to a recognized hazardous waste disposal site (e.g. Walvis Bay or Windhoek), with prior permission from the relevant Municipality.</p>	<p>There is a Waste Management Plan in place (also see Figure 10).</p> <p>Waste is reduced (by buying in bulk quantities) and recovered, i.e. tins and glass are taken to Rent-a-Drum in Windhoek via truck and used vehicle oil and filters are sent to OilTech Namibia CC in Windhoek for recycling and disposal (documentation made available by Mr Andrew Schoeman, Back of House Manager &BEYOND).</p> <p>Paper and cardboard are incinerated (Mr Andrew Schoeman, Back of House Manager &BEYOND, pers. comm.).</p> <p>It is advised that the organic waste from the kitchen be composted and used in the gardens.</p>


Aspect	Impact	Mitigation & Management Measures	Compliance & Comments
 <p data-bbox="197 596 2042 655">Figure 10: Pictures showing: a) waste segregation at the lodge; b) waste storage at the staff village for recycling; and c) spill kit at the staff village (Source: Mr Andrew Schoeman, Back of House Manager & BEYOND).</p>			
Waste management: sanitary	Pollution of biophysical environment	<p data-bbox="833 687 1426 794">Ensure that the discharge of sanitary wastewater to land conform to the regulatory requirements (Ministry of Agriculture, Water and Forestry's (MAWF) Water Quality Standards for Effluent (2008).</p> <p data-bbox="833 823 1426 879"><i>Note that all toilets are of the flush-type and drain into septic tanks and French drains.</i></p> <p data-bbox="833 908 1426 986">Use bio-degradable toilet cleaners that do not kill the bacteria in the septic tanks. <i>Biotreatment is added (to the toilets, etc.) once every three weeks.</i></p>	<p data-bbox="1444 687 2042 823">Afro Ventures Namibia (Pty) Ltd T/A & Beyond Sossusvlei Desert Lodge needs to apply for an effluent discharge permit from the DWA, Ministry of Agriculture Water and Land Reform (see Maartens, 2016).</p>
<p data-bbox="197 1023 1839 1046">All the flush toilets at the &Beyond Sossusvlei Desert Lodge and Staff Village drain into septic tanks and then a French drain system (see Maartens, 2016).</p> <p data-bbox="197 1075 2042 1131">Since 2016, a Biobox sewerage plant that processes all sewerage and waste water has been installed at the Staff Village (see Figure 11; Mr Andrew Schoeman, Back of House Manager & BEYOND, pers. comm.).</p>			



Figure 11: Pictures showing: a), b) and c) staff village Biobox sewage plant system; and d) (Source: Mr Andrew Schoeman, Back of House Manager & BEYOND).

Wastewater management	Pollution of biophysical environment	<p>Minimize the use of the laundry through asking guests to reuse the towels and bedding. <i>Guests are asked to re-use towels.</i></p> <p>Control the consumption of cleaning materials. If feasible, substitute cleaning materials with biodegradable products.</p> <p>Avoid/minimize the use of cleaning agents that contain phosphates, nitrilotriacetic acid or any of its salts, ethylene diaminetetraacetic acid and ethylene dinitrilotetraacetic acid or any of their salts, alkylphenol ethoxylate, halogenated organic solvents, butoxy-ethanol, and (Volatile Organic Compounds (VOCs) in excess of 10 percent by mass.</p>	<p>Ongoing.</p> <p>All cleaning materials are bought from Taurus Maintenance Products (see https://www.tmpn.com/; Mr Andrew Schoeman, Back of House Manager & BEYOND, pers. comm.).</p>
Wastewater management - stormwater management	Soil erosion	Regular inspection and maintenance of permanent erosion and runoff control features.	Ongoing.
&Beyond Sossusvlei Desert Lodge: Occupational and Community Health and Safety			
Food quality	Occupational and Community Health and Safety	Apply international standards/implement systems re. the handling, preparation and storage of food, e.g. SANS 10049:2001 (Food Hygiene Management) and/or ISO (International Organization for Standardization) 22000:2018 (Food Safety Management System (FSMS)).	Ongoing. A very comprehensive Kitchen – HACCP (Hazard Analysis Critical Control Points) <i>Best Operating Practices</i> (April 2020) is in place (documentation made available by Mr Andrew Schoeman, Back of House Manager & BEYOND).
Indoor air quality	Occupational and Community Health and Safety	<p>Use low VOC-emitting products.</p> <p>Avoid, where possible, the use of aerosols, sprays and air fresheners.</p>	Ongoing.

Aspect	Impact	Mitigation & Management Measures	Compliance & Comments
		Housekeeping and cleaning products to be used during unoccupied hours. HVAC system: conduct periodic, preventive maintenance (incl. cleaning drain pans and changing filters); keep duct lining dry; ensure clean mechanical rooms; and fix leaks and clean spills immediately.	There is a qualified refrigerant technician at the Lodge that is responsible for basic maintenance and servicing of the equipment. There is also an ongoing servicing programme in place (Mr Andrew Schoeman, Back of House Manager &BEYOND, pers. comm.).
Swimming pools	Community Health and Safety	Implement a pool water sanitization programme; the programme should include the monitoring of water quality (also see World Health Organization (WHO), 2006).	Compliant and ongoing. Filtration takes place for eight hours per day. The pools are brushed and vacuumed each day. Each pool has a pool floater (BLU52) and a chlorine test is carried out at least every two weeks. Acid is used on demand (Mr Andrew Schoeman, Back of House Manager &BEYOND, pers. comm.).
&Beyond Sossusvlei Desert Lodge Airfield			
Management and Monitoring	Social and Environmental Performance	Comply with Namibia's Aviation Act, the Civil Aviation Regulations (CARS), and the Civil Aviation Technical Standards (CATS). Comply with the NamibRand Nature Reserve EMP (2007): Aircraft flying over the Reserve should maintain a minimum height of 1, 000 metres (m) (3,000 feet); scenic flights departing and returning to the Reserve should maintain this height until passing the boundaries of the Reserve	Ongoing (also see Figure 12).
Occupational and Community Health and Safety	Social and Environmental Performance	Notice or information boards relating public health and safety hazards and emergency contact details should be put up at the aircraft parking area.	



Figure 12: Pictures showing: a) parking apron; b) arrival and safety equipment; and c) the wind sock (Source: Mr Andrew Schoeman, Back of House Manager &BEYOND).

Aspect	Impact	Mitigation & Management Measures	Compliance & Comments
Landing Strip Maintenance	Air quality (dust or Particulate Matter (PM) pollution)	Maintain the landing strip surface to preserve surface characteristics (e.g. texture and roughness). <i>The landing strip is graded once a year; tyres are used to grade the strip on a monthly basis.</i> Avoid landing strip maintenance under high wind conditions or when a visible dust plume is present. Use dust control/suppression methods, such as applying water or non-toxic chemicals to minimize dust.	Ongoing.
	Soil erosion	Reduce or prevent soil erosion (if relevant).	
	Occupational and Community Safety	Maintain the landing strip surface to preserve surface characteristics (e.g. texture and roughness). <i>The landing strip is graded once a year; tyres are used to grade the strip on a monthly basis.</i> Replace the wind sock (as needed). Paint the boundary demarcation stones (of the landing strip) white. <i>The landing strip is demarcated with white stones.</i>	
	Economical	Ensure that the run-up pad is free of rocks/stones before landing.	
Landing and Takeoff of Aircraft: Fauna/Avifauna on the landing strip	Occupational and Community Safety	Apply wildlife repellent techniques (if necessary), e.g. audio techniques, or visual techniques to scare and repel wildlife. <i>The runway is cleared 30 minutes before takeoff and landing.</i>	Ongoing. There is an Air Strip Procedure in place. The Aviation Company is in Whatsapp contact with the Lodge; the Rangers check the landing strip 10 to 15 minutes before landing (Mr Andrew Schoeman, Back of House Manager & BEYOND, pers. comm.).
Parked Aircraft	Pollution of biophysical environment (air, soil and water)	Aircraft maintenance/servicing/washing not to be allowed on site. Enforce proper waste (hazardous and non-hazardous) management practices. <i>Note that no re-fuelling of aircraft takes place in the area.</i>	Ongoing.
Rehabilitation and Closure			
Rehabilitation and Closure	Social and Environmental Performance	Remove the Solar PV (photovoltaic) Modules. If it cannot be recycled, the modules to be disposed of at the hazardous waste disposal site in Windhoek or Walvis Bay.	Not (Currently) Applicable

3.3 Compliance: Monitoring and Reporting

In order to illustrate &Beyond Sossusvlei Desert Lodge’s compliance with the proposed “monitoring and reporting” (see Maartens, 2016), the following colour codes were applied:

	Compliance/Completed
	In Progress/Ongoing
	Non-compliance
	Not Applicable

Type	Parameter	Frequency	Compliance
Wastewater discharge	As per the Department of Water Affairs (DWA), Ministry of Agriculture, Water and Forestry’s (MAWF) Effluent Numeric Requirements.	As per DWA effluent discharge permit requirements	Afro Ventures Namibia (Pty) Ltd T/A &Beyond Sossusvlei Desert Lodge needs to apply for an effluent discharge (and reuse) permit from the DWA, Ministry of Agriculture Water and Land Reform (see Maartens, 2016).
Swimming pool water sanitization	Monitor the water quality to establish treatment need and frequency	<i>Ad hoc</i>	Ongoing.
Stormwater and soil erosion	Soil erosion rates	<i>Ad hoc</i> (rainy season)	Ongoing.
Alien invasive plant species	Identification and removal of any alien invasive species	Three-monthly monitoring	Ongoing.
Environmental Management Plan	Environmental performance / corrective measures to be taken as or when required	Internal audits (monthly) External audits (annual)	The Ministry of Environment, Forestry and Tourism (MEFT) requires Environmental Clearance Certificate-holders to submit Bi-Annual Environmental Reports to the MEFT (see http://www.eia.met.gov.na/).

4 Conclusions and Recommendations

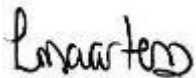
The Sossusvlei Desert Lodge was taken over by the &Beyond Group in 2001.

It is advised that &Beyond Sossusvlei Desert Lodge, and their employees and contractors, should implement and observe the Environmental Management Plan on an ongoing basis.

Specific recommendations include (that Afro Ventures Namibia (Pty) Ltd T/A &Beyond Sossusvlei Desert Lodge):

- Appoints a Safety, Health and Environment Representative;
- Composts the organic waste from the kitchen for use in the gardens;
- Obtains a letter from the Department of Water Affairs, Ministry of Agriculture, Water and Land Reform, stating that it is not a Water Control Area (and that the &Beyond Sossusvlei Desert Lodge may abstract water for commercial purposes); and
- Applies for wastewater discharge and reuse permits from the Ministry of Agriculture, Water and Land Reform.

Environmental performance should be regularly monitored (so that the lessons learnt can be incorporated into the improvement of the Environmental Management Plan over time) and corrective measures taken as or when required.



Dr Lima Maartens
LM Environmental Consulting

5 References

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6 Annexure A



REPUBLIC OF NAMIBIA

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19 January 2017

OFFICE OF THE ENVIRONMENTAL COMMISSIONER

The Managing Director
Afro Ventures Namibia (Pty) Ltd T/A & Beyond Sossusvlei Desert Lodge
P.O Box 11480
Windhoek
Namibia

Dear Sir

SUBJECT: ENVIRONMENTAL CLEARANCE CERTIFICATE FOR THE &BEYOND SOSSUSVLEI DESERT LODGE, GIBEON CONSTITUENCY, HARDAP REGION

The Environmental Management Plan submitted is sufficient as it made an adequate provision of the environmental management for the above mentioned project. From this perspective, regular monitoring and evaluation on environmental performance should be conducted. Targets for improvements should be established and monitored from time to time.

This Ministry reserves the right to attach further legislative and regulatory conditions during the operational phase of the project.

On the basis of the above, this letter serves as an environmental clearance certificate for the project to proceed. However, this clearance letter does not in any way hold the Ministry of Environment and Tourism accountable for misleading information, nor any adverse effects that may arise from this project's activities. Instead, full accountability rests with Afro Ventures Namibia (Pty) Ltd T/A & Beyond Sossusvlei Desert Lodge and their Consultants.

This environmental clearance is valid for a period of 3 (three) years, from the date of issue unless withdrawn by this office.

Yours sincerely,

Teofilus Nghitila
ENVIRONMENTAL COMMISSIONER
Office of the
Environmental Commissioner



"Stop the poaching of our rhinos"

All official correspondence must be addressed to the Permanent Secretary