

**An Amended and Updated  
Environmental Management Plan**  
For the  
**OPERATIONS OF EMIRATES HOTEL**  
@  
**Ondangwa, Oshana Region**



August 2023

<p><b>PROJECT NAME</b></p>	<p><b>An Amendment and Updating of an Environmental Management Plan for the Operations of Emirates Hotel at Ondangwa in Oshana Region</b></p> <p><b>Renewal of an Environmental Clearance Certificate</b></p>
<p><b>ECC APPLICATION NO.</b></p>	<p><b>APP – <del>001825</del></b></p>
<p><b>PREPARED FOR</b></p>	<p><b>Emirates Hotel</b></p> <p>Contact Name: Ester Kafute Haimbodi (Mrs)  Designation: Hotel Manager  Tel: 081 149 6420  Cell: 081 324 2946  Email: <a href="mailto:kafutehaimbodi@gmail.com">kafutehaimbodi@gmail.com</a>  Address: Box 90101, Ongwediva, Namibia</p>
<p><b>PREPARED BY</b></p>	<div data-bbox="954 1048 1235 1180" data-label="Image"> </div> <p>Box 25021, Windhoek, Namibia  Cell: 081 127 3027  Fax: 088 645 026  Email: <a href="mailto:ekwao@iway.na">ekwao@iway.na</a></p>
<p><b>DATE PREPARED</b></p>	<p>August 2023</p>

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## ANNEXURE

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## LIST OF ACRONYMS

Acronym	Expansion
BAT	Best Available Technology
BID	Background Information Document
Capex	Capital Expenses/Expenditure
CO	Carbon Monoxide
EH	Emirates Hotel
EIA	Environmental Impact Assessment
EMA	Environmental Management Act
EMP	Environmental Management Plan
GPS	Global Positioning System
GRN	Government of the Republic of Namibia
HAN	Hospitality Association of Namibia
HDI	Human Development Index
HPP	The Harambee Prosperity Plan
IAPs	Interested and Affected Parties
m <sup>2</sup>	square meters
m <sup>3</sup>	cubic meters
MEFT	Ministry of Environment, Forestry and Tourism
NAAQS	National Ambient Air Quality Standards
NAMPOWER	Namibia Power Corporation Pty Ltd
NAMWATER	Namibia Water Corporation Ltd
NHC	National Heritage Council
NORED	Northern Regional Electricity Distributor
NSI	Namibia Standards Institute
NTB	Namibia Tourism Board
NWR	Namibia Wildlife Resort
Opex	Operational Expenses
LPG	Liquefied Petroleum Gas
ORC	Oshana Regional Council
OTC	Ondangwa Town Council
PPE	Personal Protective Equipment
SHE	Safety, Health & Environment
SME	Small and Medium Enterprises
SO <sub>2</sub>	Sulphur Dioxide

## DEFINITION OF TERMS

Term	Expansion
<b>Anthropogenic Impact</b>	Human impacts on the environment which includes changes to the biophysical environments, ecosystems, biodiversity and natural resources caused directly or indirectly by human activities including global warming, environmental degradation, etc.
<b>Assessment</b>	A process of collecting, organizing, analyzing, assessing and communicating information for the purpose of making an informed decision.
<b>Biodiversity</b>	The variability among living organisms from all sources including terrestrial marine and other aquatic ecosystem and ecological complexes which they are part of.
<b>Competent Authority</b>	A person or organization that has the legally delegated or invested authority, capacity or power to perform a designated function, e.g. Ondangwa Town Council or the Environmental Commissioner in granting an ECC or refusing to grant an ECC.
<b>Construction Activity</b>	A construction activity is any action taken by the Contractor, its subcontractors, suppliers or personnel employed by such a contractor during the construction process as defined in the Roads Authority Act (Act No. 17 of 1999)
<b>Cumulative Impacts</b>	In relation to an activity means the impact of an activity that in itself may not be significant but may become significant when added to the existing and potential impacts eventuating from similar or diverse activities or undertaking.
<b>Developer or Promoter</b>	A promoter or developer remains responsible for ensuring that the project or development is implemented in compliance of the provisions and guidelines as provided for in the EMP - throughout all phases of the project – construction, operational and decommissioning.
<b>Ecology</b>	The study of the interrelationship between the organisms and their environments.
<b>Environment</b>	All physical, chemical and biological factors and conditions which influence an object and or organism. It is also defined as the surroundings within which human beings exist and is made up of the land, water, atmosphere, plants and animal life (micro and macro) including interrelationships between the factors and the physical or chemical conditions that influence human health and well-being
<b>Environmental Impact</b>	Any change to the environment whether adverse or beneficial, wholly or partially, resulting from human activities, products or services.
<b>Environmental Impact Assessment</b>	A process of evaluating and assessing the likely environmental impacts that a proposed project or development will have on the environment taking into account the inter-related socio-economic, cultural and human-health impact, both beneficial and adverse.
<b>Environmental Management Plan</b>	An EMP is a legal bidding document which stipulates environmental and socio-economic mitigation measures which must be implemented and complied with by several parties responsible for proposed development throughout the duration of the said development.
<b>Hazard</b>	Anything that has the potential to cause damage to life, property and/or the environment. The hazard of a particular material or installation is constant, that is, it would present the same hazard wherever it was present.
<b>Indigenous</b>	An indigenous species is a species which occurs or has historically occurred, naturally in a free state within the borders of Namibia. Species which have been introduced to Namibia as a result of human activity are excluded.
<b>Interested and Affected Parties</b>	Any person, group of persons or organisation interested in or affected by an activity contemplated in an application for Environmental Clearance Certificate, or any organ of state that may have jurisdiction over any aspect of the activity.
<b>Mitigation</b>	The implementation of practical measures to reduce adverse impacts to the environment
<b>Proponent</b>	Any person who submits on intends to submit an application for an authorisation as legislated by the Environmental Management Act No. 7 of 2007, to undertake an activity or activities identified as a listed activity or listed activities, or in any other notice published by the Minister of MEFT.
<b>Public</b>	Citizens are people have diverse cultural, educational, political and socio-economic characteristics. The public is not a homogenous and unified group of people with a set of agreed common interests and aims. There is no single public. There are a number of publics, some of whom may emerge at any time during the process depending on their particular concerns and or issues at hand.
<b>Public Participation Process</b>	A process through which interested and affected parties are informed about the proposed development and are afforded the opportunity to provide their inputs and comments as well as to voice any concerns or objections which they might have on the proposed development
<b>Species</b>	Means a kind of animal, plant or other organism which does not normally interbreed with individuals of any kind. The term 'species' include any sub-species, cultivar, variety, geographic race, strain or hybrid
<b>Vulnerable</b>	A species is 'vulnerable' when it is not critically endangered or endangered but is not facing a high risk of extinction in the wild in the medium term.
<b>Watercourse</b>	A river or spring; a natural channel in which water flows regularly or intermittently; a wetland, lake or dam into which, or from which, water flows; and any collection of water. A reference to a watercourse includes where applicable its bed and banks.

## 1. BACKGROUND TO THE DEVELOPMENT

### 1.1 Introduction

Emirates Hotel CC ('EH' for short) asked Ekwao Consulting (**Ekwao**) to attend to the renewal of its Environmental Clearance Certificate (ECC). The ECC is required for the commissioning and day-to-day management of its brand new hotel operation in the town of Ondangwa.

The ECC was granted on 11 March 2017 based on an Environmental Impact Assessment (EIA) study and an Environmental Management Plan (EMP) handled by Africa Planning Forum (APF). The ECC, which has since expired is attached hereto (**Fig.3**).

The first EMP had, essentially provided mitigation measures to those environmental impacts associated with the first two phases of the development, namely, the planning phase and construction phase. These two phases were projected to endure for a period of about four years.

### 1.2 Covid-19 Disruptions

The construction of the hotel started during the last quarter of 2018 and proceeded smoothly until it was disrupted by the outbreak of Covid-19 in the first half of 2020. The effect of the pandemic was that all construction activities were halted and kept in abeyance pending the recovery of the tourism and hospitality economic subsector.

### 1.3 Project Status

All building activities are completed with only the landscaping and paving of parking areas still to be done. The present activities taking place at the site are the installation of hotel facilities (guestroom furniture & fittings, restaurant appliances, etc.) and amenities such as air conditioners, television sets, Wi-Fi, projectors for conference rooms, etc. The plan is for Emirates Hotel to welcome its first guests by the end of November 2023 which coincides with the festive activities.

### 1.4 Rationale to Amend and to Update the EMP

The expired ECC was granted and issued to Emirates Construction, the parent company and not to Emirates Hotel which is the operating arm of Emirates Construction in the hospitality industry. The approved EMP had covered the planning and construction components which are now complete.

The EMP has to be updated to cover the business phase (operational phase) of the hotel operation. The following aspects have been covered in the updated EMP:

- A brief overview of all components and related operations of the hotel establishment.
- A summary of the legal instruments in which the establishment operates
- An brief overview of the potential impacts likely to occur during the operational phase.
- Management measures/actions aimed at mitigating, avoiding or eliminating such impacts.

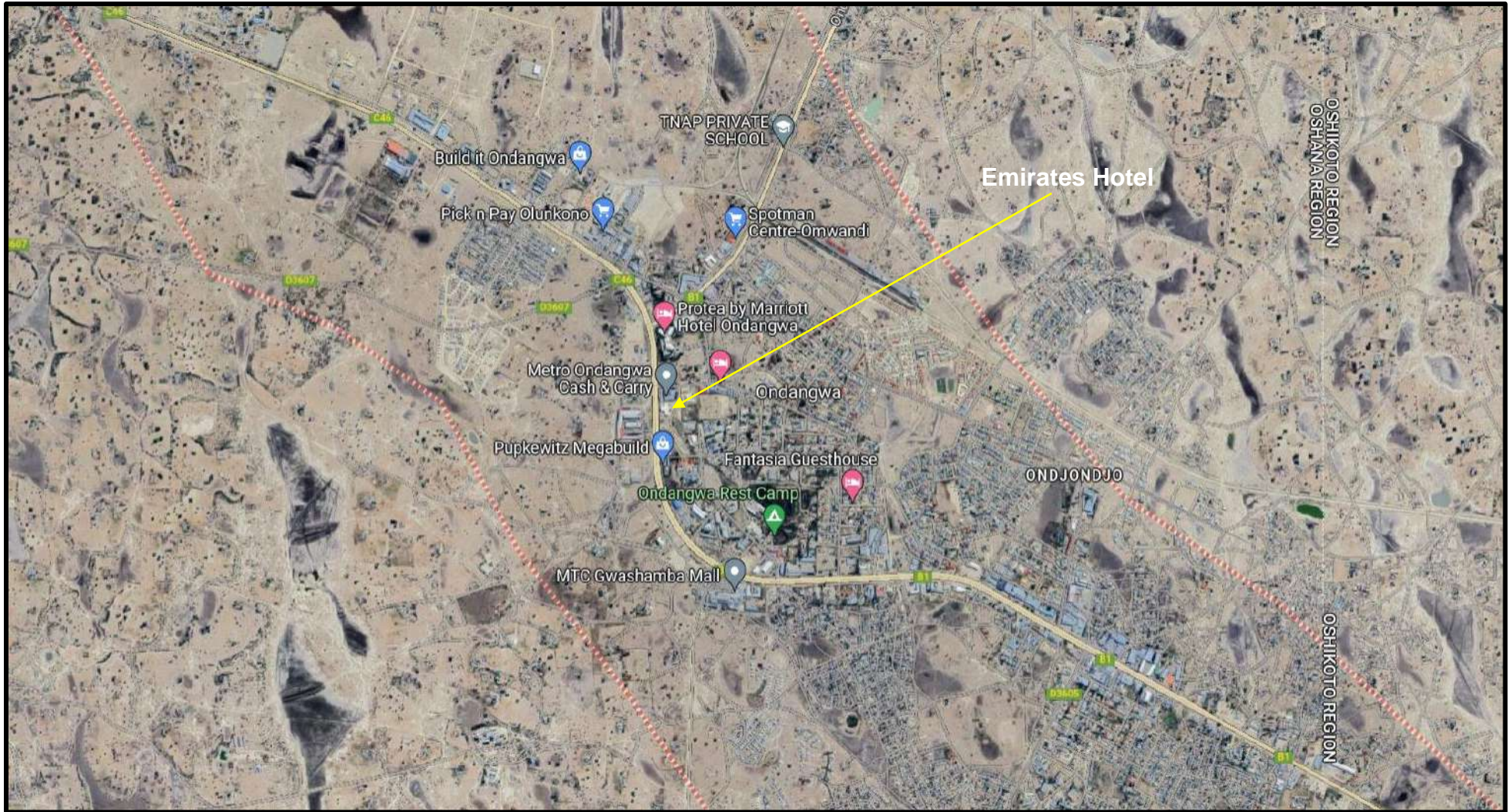


Figure 1: Project Site Aerial View – Ondangwa Town





Figure 2: Project Site Street View

## 2. PROJECT DESCRIPTION

EH is an upper market hotel establishment built on two levels boasting these facilities:

- A total of 33 guest bedrooms all rooms ensuite;
- Conference and banqueting facilities;
- Restaurant able to site up to 90 guests;
- A lounge with a cocktail bar;
- Curio shop and leisure bar, and
- Ample parking, and
- A landscaped yard with lawn.

Operational activities will be typically be the same as at any similar establishments in the hospitality industry. Guests are received at the reception where they are booked into guestrooms and also checked out at the end of their stay, food is ordered and served in the modern restaurant, beverage is ordered and served to guests while enjoying their meals in the restaurant or while sitting in the leisure lounges.

The services will be provided by a staff complement consisting of well trained and experienced personnel mixed with those receiving practical training. Maintenance of facilities and amenities is done on a regular basis while cleaning of guestrooms and the yard is done daily. The hotel premises will be guarded by security personnel on a 24 hour basis ensuring the safety and security of the guests and their vehicles.



Figure 3: Building Work Halted Due to Covid – 2021



Figure 4: Emirate Hotel nearing completion – June 2023



REPUBLIC OF NAMIBIA

MINISTRY OF ENVIRONMENT AND TOURISM

Tel: (00 25461) 284 2111  
Fax: (00 25461) 229 936

Cnr Robert Mugebe &  
Dr Kenneth Kaunda Street  
Private Bag 13306  
Windhoek  
Namibia

E-mail: [rikka.shikongo@met.gov.na](mailto:rikka.shikongo@met.gov.na)

Enquiries: Ms. Rikka Shikongo

26<sup>th</sup> October 2017

OFFICE OF THE ENVIRONMENTAL COMMISSIONER

The Managing Member  
Emirates Construction cc  
P.O. Box 90101  
Ongwediva

Dear Sir/Madam

**SUBJECT: ENVIRONMENTAL CLEARANCE CERTIFICATE FOR THE OPERATION OF EMIRATES HOTELS ON ERF 1323, EXTENSION 4 IN ONDANGWA, OSHANA REGION**

The Environmental Management Plan submitted is sufficient as these have made an adequate provisions of the environmental management concerning the proposed activities. From this perspective regular environmental monitoring and evaluations 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. From this perspective, I issue the clearance with the following condition that all applicable permits should be obtained.

On the basis of the above, this letter serves as an environmental clearance certificate for the project to commence. 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 Emirates Construction cc and their consultant.

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



**“Stop the poaching of our rhinos”**

All official correspondence must be addressed to the Permanent Secretary

Figure 5: Expired ECC

### 3. The Legal Framework

In this section, the legislations, policies and guidelines that are relevant and applicable to the development and operations of hospitality establishment are presented in a table format. The overall objective is to acquaint the proponent, EH of the legal requirements and expectations as laid out in such legal instruments that have to be fulfilled for the wellbeing of the guests, the employees, stakeholders and the general public.

#### 3.1 The Laws

The Republic of Namibia has five tiers of law and a number of policies relevant to environmental assessment and protection which include the following:

- The Namibia Constitution;
- Statutory Law;
- Common Law;
- Customary Law, and
- International Law.

#### 3.2 Applicable Legislations

The legislations applicable to this activity are listed in **Table 1**, below.

**Table 1:** Laws, Policies and Regulations

Legislations & Policies	Applicable Legislation												
	A	B	C	D	E	F	G	H	I	J	K	L	
The Constitution of Namibia													
The Environmental Management Act													
Hazardous Substance Ordinance													
The National Heritage Act													
Local Authorities Act													
Namibia Tourism Board Act													
Public & Environmental Health Act													
The Labour Act (as amended)													
Atmospheric Pollution Prevention Ordinance													
Road Traffic and Transport Act													
The Electricity Act of 2007													
Urban and Regional Planning Act													
Water Resources Management Act													
<b>Legend</b>													
A	Use of Natural Resources				H	Biodiversity							
B	Emissions Impact (Air & Odour)				I	Archaeological, Cultural and Heritage							
C	Emissions (to land & hazard)				J	Social-economic Impacts							
D	Noisy Impacts				K	Health and Safety Impacts							
E	Visual Impacts				L	Energy Resources							
F	Vibrations												
G	Land Use												

## 4. THE ENVIRONMENT BASELINE

Described in this section are some of the environmental baseline in which the EH is located:

### 4.1 Locality and Surrounds

The Emirates Hotel is located in the historic town of Ondangwa – one of the oldest towns, first established as a missionary center in 1918 and in later years served as the administrative seat for the successive governments prior to achieving national independence in 1990. For the majority of the residents in the northern regions, Ondangwa is a gateway to most destinations in Namibia when you choose to travel by road, by air or by train.

It is a town visited by hundreds of tourists each year and boasts a number of lodges and hotels. Within a radius of 800 m of EH there are at least four similar hospitality establishments – Ondangwa Protea Hotel, Oshoto Lodge, Ekamuti Lodge and Ondangwa Town Lodge.



Figure 6: View from West (B1 highway)



Figure 7: View from East



Figure 8: View from South



Figure 9: View from North

#### **Potential Impacts/Issues:**

EH is adjacent the busiest B1 highway in close proximity to where the road forks into two (one leading to Oshikango and another to Oshakati). The revamped Andimba Toivo YaToivo Airport is about 2 km away – the new hotel is therefore destined to capture a fair share of those tourists arriving by air. The operation is similar in nature and character to those offered by similar establishments in the locality.

Traffic to and from the hotel site is likely to be one aspects presenting some significant impact especially during those peak hours.

## 4.2 Topography and Drainage

The general topographic view of the area is quite flat without any obvious changes in elevation. However, the hotel site was once a shallow natural water pond in which rainwater pooled from all directions. Prior to construction, the hotel site has been filled up, compacted and levelled but its periphery and the neighbouring erven are still slightly lower than hotel floor level and the adjacent B1 highway.



Figure 10: Sections around the hotel where surface water occurs

### Potential Impacts/Issues:

During the business phase of the hotel any harmful pollutants such as oil leaks from vehicles of patrons, that are not contained, are likely to be transported via surface water runoff and via stormwater drainage lines eventually ending up in the lower lying areas, potentially polluting the surrounding environment.

## 4.3 Surface Water

There are no permanent surface waterbodies around the project site. However, during the rainy season water will collect and pool in the sections south of the hotel which is an extension of 'oshana' as seen in Figure 8. The oshana extends to the east and northeastern sections and therefore these areas are expected to have standing water for longer period of time depending on the level of saturation and amount of water received.

Surface water flow from the hotel premises is likely to flow in this direction. It is therefore important that potential pollutants are contained on the hotel premises and not allowed to escape to enter the natural environment outside the premise.

### Potential Impacts/Issues:

Runoff from the hotel parking areas and all around the building is transported outside the hotel site via surface water drainage lines. During the rainy season, such runoff has the potential to pollute and to contaminate surface water outside the premises if it contains harmful pollutants such as hydrocarbons.



Figure 11: Looking East

#### 4.4 Hydrogeology

The town of Ondangwa is entirely dependent on water supplied to it by Namwater and does not have any boreholes of its own. From the hydrogeological perspective, the project site is in what is known as the Etosha-Cuvelai water basin which constitutes the Cuvelai river catchment system. Today, the Cuvelai system is made up of multiple *oshanas* that only flow during the rainy season. These *oshanas* are shallow, somewhat poorly defined, but interconnected flood channels through which surface water runs draining towards Etosha.

##### Potential Impacts/Issues:

Groundwater is reportedly shallow, often brackish and therefore not utilised in the area. Pollution of the groundwater is still prohibited. Contamination of groundwater could lead to lateral spreading of hydrocarbon products spilled or leaked during any maintenance work at the hotel.

While the chance of groundwater pollution from hotel activities maybe remote, allowing used cooking oil, fatty and grease items to enter underground utilities could have negative impacts which could lead to service interruptions when such utilities have to repaired or replaced due to malfunctioning or blockages.

#### 4.5 Climatic Conditions

Ondangwa is one of the hottest places in Namibia where maximum temperature ranges between 38 °C and 28 °C and minimum between 8 °C and 20 °C. Air conditioning in guestrooms is therefore a basic amenity for hospitality establishments offering accommodation and conferencing services.

On average Ondangwa receives between 400 and 500 mm of rainfall per annum with most precipitation occurring between the months of November and March. Other than the above average rainfall recorded during the 2008 rainy season in the northern central regions, no drastic extremes have been recorded for Ondangwa in recent years.

The average sunshine per season is 1 382 hours. The benefit of sunshine hours is that the use of alternative energy supply such as solar energy can be applied. With these amounts of sunshine hours, the project could install solar panels and effectively supplement the expensive sourced from Nored thereby reducing its energy bill and passing the benefits on to its customers

**Potential Impacts/Issues:**

High temperatures require the use of air conditioning which consumes energy and pushes up the cost of doing business. This is a negative impact, which can be mitigated by switching to alternative solar energy to supplement the expensive energy sourced from the grid.

Occasionally, heavy downpours have caused flooding of street roads in Ondangwa especially in those areas where stormwater evacuation canals are not developed yet. The EH is built on what used to be a natural water pond, but was filled up during the construction phase. Flooding of low lying areas is a potential impact which should be monitored during the first years of operation.

**4.6 Fauna and Flora**

The project site is located in a landscape dotted by Makalani palm trees (omilunga), and other trees species i.e. *acacia erioloba (omuthiya)*, eemwandi, etc. that are commonly found in the northern central regions. No vegetation of note is present in the direct vicinity of the hotel site. Several birds species, insects and reptiles are also encountered but none has any special status of being threatened or extinct.

During the summer and autumn months when grazing is generally poor in the northern central regions livestock (such as cattle, goats and donkeys) is often encountered within the town boundary, wandering around crossing traffic roads posing a danger to motorists and themselves.

**Potential Impacts/Issues:**

The hotel is situated in an urban setting – a human environment which has already been disturbed by human activities. There is therefore no immediate threat to any existing biodiversity. However, pollution and contamination can still occur and cause damage to any biodiversity.

Livestock feeding on waste in an uncovered waste bin is a typical example of neglect. Birds are often frequenting business establishments to scavenge for leftover food items or to drink water from leaking taps and this can be a nuisance.

**4.7 Demographic and Economic Considerations**

According to the 2011 National Population Census, Oshana region had a population of 176 674 people in at least eleven electoral constituencies as shown, The region had three urban localities – Ondangwa, Oshakati and Ongwediva. Oshana is therefore one of the densely populated regions in the country.

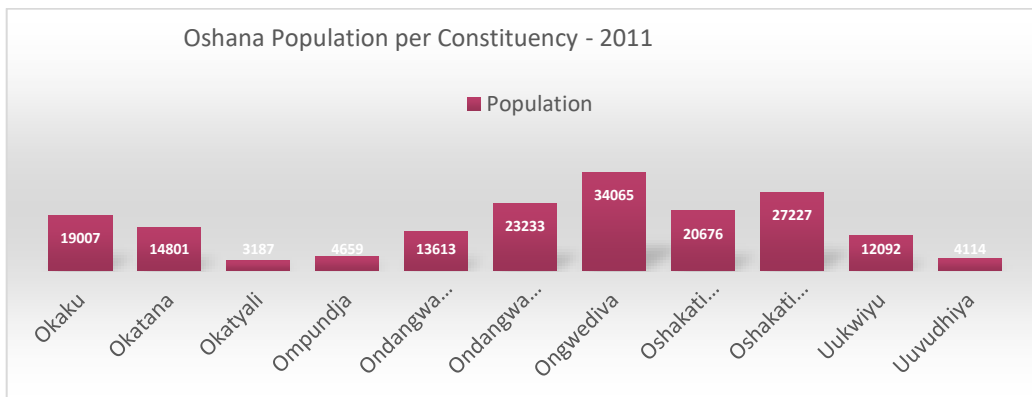


Figure 12: Demographic of Oshana Region



The urban population by 2011 was as indicated in Fig below:

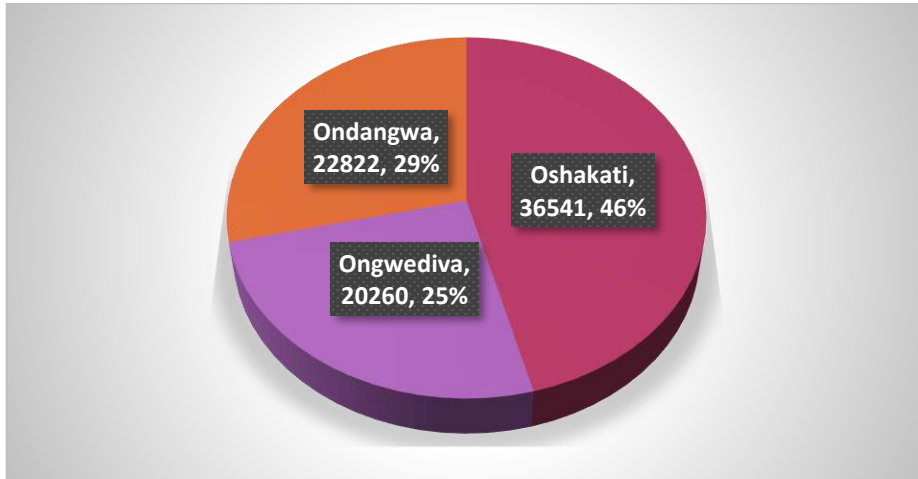


Figure 13: Urban Localities in Oshana

**Potential Impacts/Issues:**

The hotel establishment will create employment opportunities to the locals and boost the local economy through the procurement of goods and services.

#### 4.8 Cultural, Heritage and Archaeological Resources

According to a number of publications, there are numerous buildings and sites of historical interests in the town of Ondangwa dating back to the arrival of the missionaries to the colonial period which qualify to be declared as cultural heritages sites.

Some of structures such as the hostel for the migrant workers, 'oombelewa dhokaholo' 'Ondjondjo' which was the first wholesale shop in northern Namibia and many others, are potential candidates for heritage resources which need to be documented and will attract a lot of tourists to the town.

Royal residences of several kings who ruled the Ondonga tribe many years ago are also potential sites for cultural and heritage interests.

**Potential Impacts/Issues:**

The hotel operations are not expected to have any impact on any known or unknown cultural, heritage or archaeological resources. However, the hotel had the potential to benefit had unique sites in the town been declared as heritage and cultural sites attracting tourists to such sites. Tourists would stay in hotels while visiting such sites.

## **4.9 INFRASTRUCTURE AND SERVICES**

### **4.9.1 WATER SUPPLY**

Water is supplied by the Ondangwa Town Council to the hotel facility. The water requirement of the hotel is not expected to impact negatively on the available water resources of the town. It is important that water is used sparingly and wisely because it is a scarce commodity. Leaking tapes and pipes must be repaired.

### **4.9.2 ELECTRICITY SUPPLY**

Electricity is supplied by Nored and the energy requirement of the hotel establishment is not expected to impact negatively on the available energy resource in the town. However, it is important that consideration be given to the use of alternative energy such as solar. It is also advisable to explore the use of appliances that are solar hybrid – geysers and air-conditioning systems are available in the market today.

### **4.9.3 WASTEWATER AND SEWAGE**

The hotel site is connected to the sewage network system of the town. Wastewater from the kitchen and restaurant sections should pass through fat traps to ensure that fatty and grease substances do not enter the sewage system clogging it up leading to problems such as leaking and spilling of wastewater effluent to the natural environment. The stench of wastewater from a leaking pipe can be very risky to the reputation of an undertaking such as a hotel establishment where guests are paying and expecting to get the best treatment.

### **4.9.4 SOLID WASTE**

Waste removal is a service offered by the local authority to all business establishments operating within the municipality land boundary. It is imperative for EH management to develop an in-house waste handling and management plan to deal with all types of waste generated by the hotel activities. Adequate and suitable waste bins should be procured and ideally colour coded. Discarded food items should be kept in bins with lids such that animals (dogs and cats) do not gain access.

Employees should be well trained and encouraged to maintain a high standard of hygiene and cleanliness by keeping the facility spotless. Given the competitive nature of the hospitality industry, 'word of mouth' is often a vital marketing tool.

### **4.9.5 LANDSCAPING AND PAVING**

All parking areas will be paved to ensure easing cleaning and to eliminate dust being blown to the hotel from movements of vehicles in and out. The rest of the yard will be landscaped using naturally occurring materials to give the surrounds of the establishment an appeal and feel that blend in well with the natural landscape.

Mature trees around the construction site have been retained (**Fig.7**) Paved walkways will ensure that guests and staff walk in designated areas only.



Figure 14: Outside sections of the hotel that will be landscaped and paved



Figure 15: Back of the hotel

## 5. THE EMP

The EMP has been updated and reviewed to meet these objectives:

- Identify potential negative impacts associated with the operational phase of hotel establishment.
- Propose measures to prevent, eliminate or mitigate negative impacts.

It should be kept in mind that the EMP is a living document that is updated as new information, policies, authority guidelines and technologies are developed and become available.

### 5.1 Management Actions

EH will be required to develop guidelines and clear procedures to govern the implementation of its management actions. Guidelines and procedures should be developed by management to cover these aspects:

- EH's marketing and promotion management plan;
- human resources guidelines;
- standard operating procedures, and
- health and safety annual audits.

### 5.2 Implementation of the EMP

There are various role players involved in the implementation of the EMP. These are statutory stakeholders and the management of EH. Management measures to mitigate potential negative impacts are presented in table formats comprising of five tables, described briefly as follows:

### 5.3 Roles and Responsibilities

#### 5.3.1 STATUTORY STAKEHOLDERS

In **Table 1**, the roles, functions and responsibilities of statutory stakeholders are presented. The number of statutory stakeholders are actually many (Ministry of Finance, Ministry of Labour, etc.), but for the purpose of this EMP only three statutory stakeholders are presented:

- MEFT,
- OTC, and
- NTB.

**Table 2:** Role Players & Responsibilities

Role Player	Responsibilities
<b>The Environmental Commissioner (EC)</b>	EMA is implemented by MEFT specifically by the EC, a statutory office responsible for ensuring and enforcing compliance with the relevant environmental legislations and regulations. Amongst the roles and responsibilities of the EC are the following: <ul style="list-style-type: none"><li>• granting (or refusing) the ECC and renewals thereof;</li><li>• ensuring overall compliance with the provisions of the EMP;</li><li>• reviewing EIA compliance reports submitted to MEFT;</li><li>• undertaking site audits at their discretion;</li><li>• reviewing of major environmental related incidents and or accidents, and</li><li>• enforcing legal mechanisms for contraventions to the EMP.</li></ul>
<b>Ondangwa Town Council (OTC)</b>	As the local authority, OTC is responsible for amongst others, the following:

Role Player	Responsibilities
	<ul style="list-style-type: none"> <li>• To ensure that buildings plans (for houses, businesses, hotels shopping malls, factories, etc.) submitted to council for approvals meet the minimum requirements as set out in the local authority bylaws.</li> <li>• To oversee all building construction activities taking place within the town boundaries.</li> <li>• To ensure that businesses and all trading activities within the local authority are conducted in a clean environment that is hazardous-free, clean and safe.</li> <li>• To issue licenses (Certificates of Fitness) to all types of businesses operated within the jurisdiction of the local authority that meet the minimum standards set by council.</li> <li>• To provide services such as potable water to houses and all business, refuse removal and disposal, recreational facilities for the residents, community infrastructure (parks and gardens), etc.</li> <li>• To construct street roads, provide street lighting, and to keep the streets and the entire town clean and habitable.</li> <li>• To levy and collect rates and taxes from residents in lieu of the services provided.</li> </ul>
<p><b>Namibia Tourism Board (NTB)</b></p>	<p>NTB is a statutory body created by an Act of Parliament to establish mechanism to develop a national policy on tourism and to effectively implement such a policy in corroboration with the role-players in the tourism industry both private and public. Amongst the roles of NTB are:</p> <ul style="list-style-type: none"> <li>• To market and to promote the tourism industry of Namibia both nationally and globally.</li> <li>• To register and grade accommodation establishments and related businesses.</li> <li>• To ensure that services rendered and facilities provided to tourists and guests comply with prescribed standards.</li> <li>• To promote the training of personnel engaged in the tourism and hospitality sectors</li> <li>• To promote the development of environmentally sustainable tourism by actively supporting the long-term conservation, maintenance and development of the natural resources base of Namibia.</li> <li>• Provide advice and guidance to persons engaged in the tourism industry.</li> <li>• To enforce compliance with the provisions of the Act .</li> </ul>

### 5.3.2 EH MANAGEMENT

Successful implement of the EMP depends on defined roles and responsibilities allocated to individuals and teams who have to carry out the required management actions. As such EH has to appoint a person who is suitably qualified and well experienced in the hospitality sector to assume the overall management of the hotel facility. The person has to have the designation of a Hotel Manager (HM).

The functions and duties of a HM are presented in **Table 3**, below:

**Table 3:** Roles and Responsibility of Hotel Manager

Designation	Roles and Functions
<p><b>Hotel Manager (HM)</b></p>	<ul style="list-style-type: none"> <li>• To manage the day-to-day operational activities of EH in compliance with all relevant rules and bylaws of OTC.</li> <li>• To facilitate the registration of EM with NTB and any affiliated bodies, i.e. Hospitality Industry of Namibia. The registration should be carried out well in advance before the hotel starts to trade/operate.</li> <li>• To ensure that the personnel for the hotel operations are hired in compliance with the labour laws and recruitment policies of Emirates.</li> <li>• To facilitate the registration of EH with OTC in order to obtain a Certificate of Finesses and related services – delivery of adequate waste skips/bin, refuse removal, etc.</li> </ul>

Designation	Roles and Functions
	<ul style="list-style-type: none"> <li>• To ensure that all new employees are given an induction on all company policies and on the provisions of the EMP.</li> <li>• To ensure that the necessary signage (parking area, location of fire extinguishers, emergency assemble point, are procured and correctly displayed inside and outside the hotel premises. This includes emergence numbers for the: <ul style="list-style-type: none"> <li>○ Local Police Charge Office,</li> <li>○ Ondangwa Ambulance Services,</li> <li>○ Ondangwa Town Council Emergency Service Number (plumbing, etc.),</li> <li>○ Fire Engine Numbers, etc.</li> </ul> </li> <li>• To maintain good open communications with all stakeholders and authorities.</li> <li>• To report any significant environmental incidents, accidents and or emergencies to the relevant local authority.</li> <li>• To ensure that all recommendations made in the monitoring and audit reports are implemented and complied with throughout the operational life cycle of the facility.</li> <li>• To ensure that any complaint received from any stakeholders and or patrons is recorded, investigated and corrective action taken.</li> </ul>

## 5.4 Management of Impacts

Management measures to mitigate each potential negative impact are proposed in an implementation plan presented in **Table 4** in this document. The implementation plan is given for the operational phase only, because all construction works have been completed. The three headings of the implementation plan are discussed here:

### 5.4.1 ENVIRONMENT ASPECT OR NATURE OF IMPACT

Possible impacts on a feature or function of the environment are identified. Description of the potential risk sources (impacting activities) and the mechanism through which an impact may occur are described.

### 5.4.2 MITIGATION

Mitigation measures are proposed for each identified impact. These measures consist of specific management actions that need to be carried out in order to avoid, minimise or remedy negative impacts, together with adjustments to respond to unforeseen impacts.

### 5.4.3 TIMING

The timing when an intervention for the management action is required is also presented.

### 5.4.4 RESPONSIBLE PARTY

In all cases the HM will be the party responsible for ensuring that the recommended management measures are implemented. The HM is expected to delegate certain duties and functions supervisors who will be responsible for various sections of the operation, i.e. restaurant and kitchen, beverages and bars, maintenance, cleaning and security.

In the absence of HM, the responsibility for the implementation of the management measures will rest with EH management.

**Table 4: EMP Implementation Guideline**

Aspect	Recommended Management Measures	Timing
<p><b>Hydrological Impacts</b> (Contamination of Surface and Groundwater)</p>	<p><b>Natural water channels:</b> Natural water channels on the hotel premises should be kept clean and not blocked. No waste may be dumped in the natural water channels on the property.</p> <p><b>Drainage:</b> Keep all drainage passages clean, tidy and waste-free. Drainage should be inspected for any cracks before the rainy season and immediately after the rainy period.</p> <p><b>Surface Runoff:</b> Runoff from parking areas and paved areas should be monitored to avoid oil stained waste leaving the premises entering the natural environment.</p> <p><b>Waste traps:</b> Where possible waste traps should be installed to trap litter and other waste from leaving the hotel premises contaminating the natural environment outside. When installed, waste traps should be regularly cleaned and inspected to ensure their efficient functioning.</p> <p><b>Rehabilitated:</b> All areas rehabilitated after construction of the hotel should be monitored for at least one year.</p>	<p>Check twice annually before and after the rainy period</p>
	<p><b>Fat traps:</b> Do not allow fats, oil and grease from ware washing, floor cleaning and equipment sanitation to enter the drainage system. Such cleaning solution should pass through fat traps. If fats, oil and grease is not removed it will accumulate in the pipes causing blockages.</p>	<p>Daily</p>
	<p><b>Biodegradable:</b> Make use of biodegradable and eco-friendly guest amenities, soaps and detergents in kitchen, laundry and bathrooms</p>	<p>Always</p>
	<p><b>Spill cleaning:</b> Any fuel leaks or oil which may occur on the parking area should be cleaned up using suitable spill kits and soil soaked oil stored in a responsible manner until disposed of at offsite approved site.</p>	<p>Whenever a spill occurs</p>
	<p><b>Water conservation measures:</b> Encourage employees and guests to conserve water. Measure and record water use. Compare water usage per with targets.</p>	<p>Monthly</p>
	<p><b>Use water saving devices:</b> Make use of dual flush toilets with small capacity cisterns. Irrigate gardens and lawn at night</p>	<p>When irrigating</p>
	<p><b>Waste Impacts</b> (Unpleasant odour, amenity nuisance, eyesore, etc.)</p>	<p><b>Waste Management Plan:</b> Develop a waste management plan for the hotel to deal with waste handling and disposal. The plan should include waste separation, storage and recycling.</p>
<p><b>Training:</b> Ensure that all employees are given a thorough training on waste handling and disposal at the hotel.</p>		<p>Prior to starting working</p>
<p><b>Recyclable waste:</b> Separate and store recyclable waste (cans, bottles, packaging, plastics, papers, etc.) and offer to recycling companies. Waste storage receptors should have lids and preferably labeled or colour coded. The lids will prevent waste from being blown away becoming a visual nuisance.</p>		<p>Daily</p>
<p><b>Organic waste:</b> Waste the kitchen (vegetable peels and waste food) should be stored in separate containers. Uncollected organic waste can start to decay /rot on the premises attracting rats and flies to the hotel and giving off a stench unpleasant to hotel guests, employees and the general public.</p>		<p>Daily</p>
<p><b>Hazardous waste:</b> In the context of the hotel, hazardous waste will include oil contaminated waste, used cooking oils, fats and greases from extraction fans/filters, fluorescent bulb waste, etc. Separate hazardous waste and store in the correct designated contains/bins until collected for disposal. Ensure that no spillage occurs during loading of hazardous waste.</p>		<p>Daily</p>

Aspect	Recommended Management Measures	Timing
Resource Management (Energy, Cooking Gas, Water, etc.)	<p><b>Electricity</b></p> <p><b>Save energy:</b> Electricity is very expensive and should be used sparingly. Ensure that the staff is trained in the electricity wise principle and that they practice prudent use of electricity.</p> <p><b>Lights:</b> Lights should be switched off when not being used.</p> <p><b>Alternative energy:</b> Consideration should be given to use solar powered systems – hybrid geysers,</p>	Daily, calculate usage monthly and compare usage from month to month to determine average usage
	<p><b>Gas:</b> Consider the use of gas powered stoves in the kitchen instead of electrical powered ones.</p>	Record monthly
	<p><b>Water:</b></p> <p><b>Consumption:</b> Monitor water consumption to ensure that there is no undue waste. If a consumption limit is granted ensure that consumption does not exceed such limits.</p> <p><b>Leaks:</b> Install a leak detection system, and promptly attend to any leaks when detected</p>	Check daily, records month
Noise Impacts (Annoyance, Irritation, Nuisance, etc.)	<p><b>Amenity Values:</b> Protect amenity values by ensuring that noise levels during those times when there are private functions such as conferences, weddings, birthday parties, etc. are kept within allowed parameters so as not to disturb ambience in the surroundings.</p> <p><b>Hooting:</b> Guests arriving at night should not hoot to alert the security guard on duty. Hooting in the middle of the night or in the early morning hours will disturb other guests and staff on the property.</p> <p><b>Complaints:</b> Any complaints related to noise disturbances received from stakeholders/community should be recorded, immediately investigated and corrective action taken.</p>	Throughout the duration of the project
Fire Hazard (Loss of assets, loss of property, in severe cases even loss of life)	<p><b>Fire Alarms:</b> Fire alarms should be installed at strategic locations throughout the hotel building. It is important to ensure that the fire alarms are kept in a functioning state.</p> <p><b>Fire Response:</b> Develop an emergency fire response plan for the hotel. Ensure that there is a fire assemble point that is clearly demarcated and signposted. Emergency numbers should be clearly displayed:</p> <ul style="list-style-type: none"> <li>o Ondangwa Police</li> <li>o Ambulance:</li> <li>o Fire Brigade/Fire and Rescue</li> </ul> <p><b>Firefighting:</b> Ensure that adequate firefighting equipment is provided and such equipment is regularly serviced and maintained. Employees should be trained on firefighting methods and techniques.</p> <p><b>Signage:</b> Provide adequate fire hazard signs such as 'No Smoking' and 'Exit Direction' signs. Such signs should be clearly displayed.</p>	Throughout the lifespan of the hotel
Visual Intrusion	<p><b>Appearance:</b> Maintain the general appearance of the hotel facility inside and outside including any walkways and parking areas. Good appearance will enhance a positive visual impact.</p>	Throughout the operational phase.
	<p><b>Monitoring:</b> Monitor areas rehabilitated after the construction for a period of at least 12 months and implement remedial action as and when required</p>	Check once yearly
	<p><b>Buildings:</b> Maintain the general appearances of all buildings and infrastructure by repainting from time to time. Poor maintenance and neglect to repaint buildings and infrastructure will result in visual decay.</p>	Paint every five years



Aspect	Recommended Management Measures	Timing
	<p><b>Light Pollution:</b> Any security light used at night should illuminate targeted objects on the hotel premises and may not offend the neighbouring residents or the public using the adjacent B1 highway.</p>	Monthly
	<p><b>Waste:</b> Wind-blown papers and plastics around the hotel premises should be regularly picked up to avoid visual nuisance. Maintain a high standard of housekeeping.</p>	
Fauna	<p><b>Food items:</b> Felt over food items and or kitchen waste should be stored in containers with lids and kept on the hotel premises so that animals (dogs, cats, etc.) do not gain access to such food items.</p> <p><b>Locked Gate:</b> The entrance gate to the hotel should be kept closed so that livestock (cattle, goats and donkeys) that often the town do not gain access to the hotel property to cause destruction and to feed on the landscaped plants and the lawn.</p>	All the time
<p><b>Employment Creation</b> (positive impacts: earning of salary other benefits, etc.)</p>	<p><b>Hiring of Employees:</b></p> <ul style="list-style-type: none"> <li>○ Adopt a 'local first policy' when hiring workers for the hotel establishment.</li> <li>○ Hire employees from the local communities without discrimination on the basis of gender, race, language, background, religion or political affiliations.</li> <li>○ Ensure that any recruitment of employees is done in a fair and transparent manner and should be gender and disability inclusive.</li> </ul> <p><b>Employees' wellbeing:</b></p> <ul style="list-style-type: none"> <li>○ Guard and sensitize employees on social ills such as drug abuse, excessive alcohol consumption and diseases (HIV /AIDS and other sexual transmitted diseases).</li> <li>○ Provide employees with PPEs who may be working in areas in which they are exposed to danger.</li> </ul> <p><b>Training:</b></p> <p>All employees should be given an induction workshop on the EMP as well as on-the-job training opportunities to improve their skills level which ultimately leads to high productivity and efficiencies.</p>	Recruitment stage and throughout the project lifespan
Labour and Working Conditions	<p><b>Dress Code:</b> Provide employees with uniforms to convey a strong signature to promote and reinforce a strong brand for EH.</p> <p><b>Labour Laws:</b> Respect and comply with the labour laws, labour legislations, labour policies and labour regulations.</p> <p><b>Records:</b> Proper records should be kept with respect to the number of people employed whether fulltime or part-time, salaries &amp; wages paid, etc.</p>	Throughout the lifespan of the project
Health and Safety (for employees and hotel guests and patrons)	<p><b>Objective:</b> Protect amenity values and business efficiency by ensuring that a high standard of health and safety is maintained in all operational activities of the hotel.</p> <p><b>Health &amp; Safety Plan:</b> Develop a Health and Safety Plan which makes provision for raising of awareness, sharing of information as well as access to health care services. The health and safety of employees as well as guests to the facility should be protected and safeguarded at all times.</p>	Beginning of the business phase
	<p><b>Emergency Response:</b> Develop an emergency response plan for the hotel operation to deal with any safety incidents or accidents occurring.</p>	At the inception of the operational phase

Aspect	Recommended Management Measures	Timing
	<p><b>Personal Protective Equipment (PPE):</b> Provide and supply suitable PPE to all employees working in the maintenance and cleaning sections of the hotel operation.</p>	At least free PPE twice annually
	<p><b>Good Housekeeping Practice:</b> Promote and encourage good housekeeping practices amongst the employees through the following measures:</p> <ul style="list-style-type: none"> <li>○ Comply with the guidelines in the EMP.</li> <li>○ Keeping the hotel neat, tidy clean and litter-free through effective handling of waste.</li> <li>○ Adherence to the relevant health and safety legislation.</li> <li>○ No consumption of alcohol during working hours is allowed.</li> <li>○ No theft of company properties.</li> <li>○ No use of drugs.</li> <li>○ No firearms on company property unless used by security personnel guarding the premises.</li> <li>○ Guests should be treated with respects.</li> <li>○ No use of foul language.</li> </ul>	Throughout the operational lifecycle of the hotel

## 5.5 EMP MONITORING

It is imperative for EH management to ensure that compliance to the EMP is monitored on a regularly basis. In **Table 5**, key simplified environmental monitoring performance indicators, that should be checked and monitored, are provided. The indicators listed in the table should be considered as guidelines only and are intended to assist the management in the early detection of environmental impacts. The hotel management has the prerogative to add to such parameters and to delegate certain functions to staff members for the efficient operation of the hotel.

### 5.5.1 MONITORING OF CONSUMABLES

For the efficient management of the hotel, it imperative that consumables such as water and electricity and any fuel used for hotel vehicles are measured and the use thereof monitored and kept within budgeted parameters. Measuring the electricity used by the hotel will make cost comparisons and justification whether to switch to solar powered units, more easier.

### 5.5.2 EMP COMPLIANCE INSPECTION

An EMP compliance inspection should be carried out at least annually to ensure that management continues to comply, and to improve its obligations and commitments made in the EMP. It is important for the hotel to keep records of environmental monitoring data and for such data to be included in the annual report.

**Table 5:** Mitigation Components to be Monitored

Aspect to be Monitored	What to Check/Monitor	Frequency	By Who
<b>Electrical Energy</b>	To keep the Opex of running the EH in check and to reduce its environmental impact, it is crucial to know how much energy (electricity) the establishment consumes per day and the cost thereof.	If a prepaid meter is installed, check daily if a conversational meter install, check monthly and compare usage from month to month	HM or as delegated
	Measuring and monitoring the electrical energy consumption and costs can help to identify areas where improvements can be made and any conservation measures that may be needed.  (Investigate the use of other measures mentioned elsewhere in this report such as the use of hybrid systems)		
<b>LPG (Liquefied Petroleum Gas)</b>	The use of LPG in industrial kitchens (hostels, hotels, lodges, etc.) is more cost effective than using appliances that are powered by electrical energy.	Record the number of LPG cylinders used per week or month and the cost.	HM or as delegated
	LPG gas are measured in mass, kilograms (kg) LPG is weighted in gas cylinders/bottles, and the cost is based on the weight of the cylinder.		
<b>Waste</b>	Onsite secure storage of waste before removal	Weekly	HM or as delegated
	Kitchen & restaurant waste	Daily	
	Guest rooms, bar, caravan park, etc.	Daily	
	Garden waste	Daily	
	Wet waste storage area	Daily	
	Dry waste storage area	Weekly	
	Garden waste storage area	Weekly	
	Waste sorting (recyclable and non-recyclable)	Daily	
	Inspection of waste bins	Quarterly	
Kitchen fat traps – inspect and clean filters	Weekly		
<b>Water</b>	Compare water usage over a period of time and determine approximate volume of water used by the hotel against occupancy rate.	Monthly	HM or as delegated
	Where huge discrepancies in usage are recorded, check any leaks from the tanks	Monthly	
	Water installation – check all steel structures for stability and integrity.	Quarterly	
	Check and inspect any water storage tanks and distribution pipes for any leaks.	Monthly	
	Check and inspect all taps for leaks	Monthly	
	Water pipes – check and inspect for leaks	Monthly	
	Sanitation – check and inspect for cleanliness and any leaks	Weekly	
	Clean rainwater gutters and downpipes of leaves before the wet season	Yearly	
<b>Sewage System</b>	Check and inspect onsite sewerage connections for any leaks	Yearly	HM or as delegated
	Check and inspect all toilets for cleanliness, hygiene and functionality.	Quarterly	
	Check and repair any leaks from toilets, taps, etc.	Yearly	
<b>Company Vehicles</b>	Check for any oil leaks under the vehicle	Daily	HM or as delegated
	Check for water level/coolant in the radiator	Daily prior to use	
	Check engine oil level	Daily before use	
	Check tyres pressure	Daily	

Aspect to be Monitored	What to Check/Monitor	Frequency	By Who
	Check general cleanliness of vehicles	Daily	
	Check for vehicle license validity & roadworthiness	Yearly	
	Check and inspect the spare wheel	Monthly	
Infrastructure	Check and inspect the condition of the walkways	Weekly	HM or as delegated
	Check and inspect the driveways	Weekly	
	Check and inspect boundary fence of the property	Weekly	
	Check and inspect the motor gates to the property	Daily	
	Check and inspect that the gates, hinges, latches, etc. are free from rot	Monthly	

## 6. DECOMMISSIONING PLAN

There are no consideration to decommission the project. In fact, the hotel has been completed after the construction activities were halted following the outbreak of Covid-19 which impacted the local tourism sector massively. There is no provision made for decommissioning.

## 7. CONCLUSIONS AND RECOMMENDATION

### 7.1 Conclusions

This EMP has described the management measures that have to be implemented for the purpose of preventing and or minimising the negative environmental impacts that are likely to be associated with the operational phase of EH in the town of Ondangwa. Measures aimed at enhancing positive impacts which will accrue from the development such as employment and stimulation of economic activities in the local economy have also been suggested.

The EMP is a legal document which commits EH to comply with all the management measures, monitoring and other plans presented in the document. In essence, the EMP is a practical, working protocol to be used in accordance with the principles of adaptive management. It must be amended when new information, new technology, new legislation and management measures become available.

Management has the flexibility to adjust the management measures suggested in this EMP in order to conform with the current best practice guidelines, while remaining within the economic means of the business.

### 7.2 Recommendation

It recommended that the ECC be renewed to allow the operational phase of EH to start.

## ANNEXURE: 1

### CC2 – Emirates Hotel

2019

CLIENT

**AMENDED FOUNDING STATEMENT  
CC2**

**EMIRATES HOTEL  
CLOSE CORPORATION**

**CC/2017/02461**

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Prepared by:

**GRANT THORNTON NEUHAUS**

PO Box 2558

Windhoek

Namibia

**Amended Founding Statement**



Before filling in the form, first see notes on page 2.

REGISTRATION NUMBER OF CORPORATION <b>CC/2017/02461</b>	DATE OF RECEIPT
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	Dates of commencement of change
Full name of corporation <b>EMIRATES HOTEL CLOSE CORPORATION</b>	* 2017-10-12
Previous name of corporation (if applicable)* <b>BLUEBUSH INVESTMENTS FIVE CC</b>	* 2017-10-12
Shortened form of name (if applicable)* <b>NOT APPLICABLE</b>	*
Literal translation of name (if applicable)* <b>NOT APPLICABLE</b>	*
Description of principal business* <b>TO CARRY ON THE BUSINESS OF A HOTEL, RESTAURANT AND ALL RELATED ACTIVITIES.</b>	* 2017-10-12
Date of end of financial year* <b>LAST DAY OF APRIL EACH YEAR</b>	*

**PART B**

Postal address* <b>PO BOX 2558, WINDHOEK, NAMIBIA</b>	*
Address of registered office (not post office box)* <b>12TH FLOOR, SANLAM CENTRE, 145-157 INDEPENDENCE AVENUE, WINDHOEK, NAMIBIA</b>	*
Name and address of accounting officer* <b>GRANT THORNTON NEUHAUS, PO BOX 2558, WINDHOEK, NAMIBIA</b>	*

(Attach written consent to appointment)

Full name of association or body of which accounting officer is a member **INSTITUTE OF CHARTED ACCOUNTANTS OF NAMIBIA**

Membership/Practice No. **9401**

\* See note 2 on page 2