

ENVIRONMENTAL IMPACT ASSESSMENT (EIA) FOR THE PROPOSED REZONING OF PORTION A OF DIVUNDU TOWNLANDS NO.1362 AND CONSTRUCTION & OPERATION OF A LODGE, KAVANGO-EAST REGION



Environmental Scoping Report

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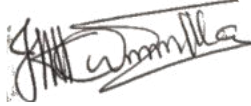
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Table of Contents

EXECUTIVE SUMMARY	7
1. INTRODUCTION AND BACKGROUND	8
1.1 OVERVIEW	8
1.2 PURPOSE OF THE EIA STUDY	9
1.3 ENVIRONMENTAL ASSESSMENT METHODOLOGY	9
2. PROJECT DESCRIPTION	11
2.1 PROJECT LOCATION	11
2.2 SITE DESCRIPTION	12
2.3 PROPOSED PROJECT ACTIVITIES	13
2.4 NEED AND DESIRABILITY	14
2.5 PROJECT ALTERNATIVE ASSESSMENT	15
3. PUBLIC PARTICIPATION PROCESS	16
3.1 OVERVIEW	16
3.2 NOTIFICATION AND INVITATIONS	17
3.3 PUBLIC MEETING	18
3.4 SUMMARY OF ISSUES RAISED DURING THE CONSULTATION PERIOD	18
4. POLICY, LEGAL AND ADMINISTRATIVE FRAMEWORK.....	19
4.1 OVERVIEW	19
5.1 APPLICABLE LEGAL INSTRUMENTS	20
6. DESCRIPTION OF THE RECEIVING ENVIRONMENT	24
6.1 SOCIAL ENVIRONMENT	24
6.1.1 ABOUT THE AREA	24
6.1.2 LIVELIHOOD WITHIN THE LANDSCAPE	25
6.1.3 FOREST RESOURCE AVAILABILITY	25
6.2 BIOPHYSICAL ENVIRONMENT	26
6.2.1 CLIMATE CONDITIONS	26
6.2.2 TOPOGRAPHY AND LANDSCAPE	27
6.2.3 GEOLOGY	27
6.2.4 SOIL	28
6.2.5 WATER	28
6.2.6 FLORA	29
6.2.7 FAUNA	29
7. IMPACTS ASSESSMENT	30
7.1 OVERVIEW	30
7.2 ASSESSMENT OF IMPACTS	30
7.2.1 POTENTIAL IMPACTS DURING THE CONSTRUCTION PHASE	32
7.2.2 POTENTIAL IMPACTS DURING THE OPERATION PHASE	37
8. CONCLUSION AND RECOMMENDATIONS	41
8.1 CONCLUSION	41
8.2 EAP RECOMMENDATIONS	41
9. LIST OF REFERENCES	43
10. APPENDICES	44
10.1 APPENDIX A: PROOF OF CONSULTATION	44
10.2 APPENDIX B: CONSENT LETTER FROM TA	44
10.3 APPENDIX C: EMP	44

List of Tables

TABLE 1: LEGISLATIVE, POLICY, AND ADMINISTRATIVE FRAMEWORK.....	20
TABLE 2: ASSESSMENT CRITERIA	30
TABLE 3: IMPACT SIGNIFICANCE.....	31
TABLE 4: IDENTIFIED IMPACTS AND MITIGATION MEASURES DURING THE CONSTRUCTION PHASE.....	32
TABLE 5: ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES DURING THE OPERATION PHASE	37

LIST OF FIGURES

FIGURE 1: NAMIBIA'S EIA PROCESS	9
FIGURE 2: PROJECT LOCALITY	11
FIGURE 3: ADJACENT LAND USES	12
FIGURE 7: SAMPLES OF PUBLIC NOTICES.....	17
FIGURE 8: PHOTOGRAPH TAKEN DURING THE PUBLIC PARTICIPATION MEETING,.....	18
FIGURE 9: MAP OF DVC TOWNLANDS.....	24
FIGURE 10: CLIMATIC MAP OF NAMIBIA	26
FIGURE 11: TOPOGRAPHY MAP OF NAMIBIA.....	27
FIGURE 12: SOIL MAP OF NAMIBIA.....	28
FIGURE 13: VEGETATION OF THE SITE.....	29

List of Acronyms

BID	Background Information Document
DEAF	Directorate of Environmental Affairs and Forestry
DVC	Divundu Village Council
EA	Environmental Assessment
EAP	Environmental Assessment Practitioner
ECC	Environmental Clearance Certificate
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
EMA	Environmental Management Act
EMP	Environmental Management Plan
FMP	Forest Management Plan
GEF	Global Environment Facility
GN	Government Notice
HPP	Harambe Prosperity Plan
I&APs	Interested and Affected Parties
MEFT	Ministry of Environment, Forestry and Tourism
NHC	National Heritage Council
NNF	Namibia Nature Fund
PPE	Personal Protective Equipment
ToR	Terms of Reference

EXECUTIVE SUMMARY

Mr. Johannes Kayenge has been allocated a portion of Farm Divundu Townlands No.1362, Divundu through a private treaty for the construction and operation of a lodge. In terms of the Townships and Division of Land Ordinance 11 of 1963 and the Urban and Regional Planning Act of 2018, certain town planning procedures must be applied for the subdivision Farm Divundu Townlands No.1362 and rezoning of the resulting portion earmarked for the lodge development. In terms of the Environmental Management Act of 2007 (Schedule 5.1) and its regulations (GN No. 30 of 2012), “the proposed Rezoning of land as well as the construction of resorts, lodges, hotels or other tourism and hospitality facilities cannot be undertaken without an Environmental Impact Assessment (EIA) being conducted and an Environmental Clearance Certificate (ECC) being obtained. Mr. Johannes Kayenge has appointed Green Gain Consultants cc to conduct an Environmental Impact Assessment for the proposed Subdivision & Rezoning and construction and operation of the proposed lodge.

In accordance with the Environmental Management Act No. 07 of 2007 and its Regulations (GN No.03 of 2012), the proposed activities cannot be undertaken without an Environmental Impact Assessment (EIA) being carried out. Green Gain Consultants cc has been appointed to undertake the EIA study and apply for an Environmental Clearance Certificate (ECC) for the proposed activities. The use of an EIA as a management tool in this project would ensure that the proponent complies with local, national, regional, and international environmental laws, and standard design codes, promote consultation, and reduce future liabilities, consequently assisting with environmental protection.

This is a systematic study of the impacts of the proposed project activities on the bio-physical and socio-economic components of the environment. The EAP undertook this EIA study, to envisage the impacts of the proposed development on the environment and propose mitigation measures that will be incorporated into the project’s Environmental Management Plan (EMP). The EMP, which is a live legal bidding document should be used as an on-site reference document for the operations of the proposed project, and parties transgressing then should be held responsible for any non-compliance.

The environmental assessment process has not identified significant social and environmental impacts resulting from the proposed project. Further analysis has identified social and environmental impacts which include but are not limited to employment creation; increase in economic growth and disturbance to biodiversity. However, by using the national and international best practices, mitigation measures were identified to avoid and/or reduce the impact, as such, the effects on the society and environment were deemed not significant, localized and of short duration. On this basis, it is the opinion of Green Gain Consultants that an ECC could be issued, with conditions attached that the management and mitigation measures as set out in the EIA and EMP are implemented and enforced at all times.

1. INTRODUCTION AND BACKGROUND

1.1 Overview

Mr. Johannes Kayenge has been allocated a portion of Farm Divundu Townlands No.1362, Divundu through a private treaty for the construction and operation of a lodge. In terms of the Townships and Division of Land Ordinance 11 of 1963 and the Urban and Regional Planning Act of 2018, certain town planning procedures must be applied for the subdivision Farm Divundu Townlands No.1362 and rezoning of the resulting portion earmarked for the lodge development.

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Mr. Johannes Kayenge has appointed Green Gain Consultants cc to conduct an Environmental Impact Assessment for the proposed Subdivision & Rezoning and construction and operation of the proposed lodge.

1.2 Purpose of the EIA study

The purpose of the EIA study is to:

- Identify and assess potential environmental impacts emanating from the construction, operation, and decommissioning of the proposed project;
- Identify and consult the Interested and Affected Parties (I&APs) and relevant stakeholders to solicit inputs;
- Compile an Environmental Management Plan (EMP) which will identify, assess and formulate appropriate management actions required to avoid, minimize or mitigate the negative impacts; or to enhance the benefits of the project.

1.3 Environmental Assessment Methodology

In compliance with the Environmental Management Act No.7 of 2007 and the Environmental Impact Assessment Regulations (GN 30 in GG 4878 of 6 February 2012), this EIA study will address environmental, social, and economic issues and concerns associated with the proposed activities. The EIA is undertaken in a holistic approach encompassing all different aspects of the EIA process.

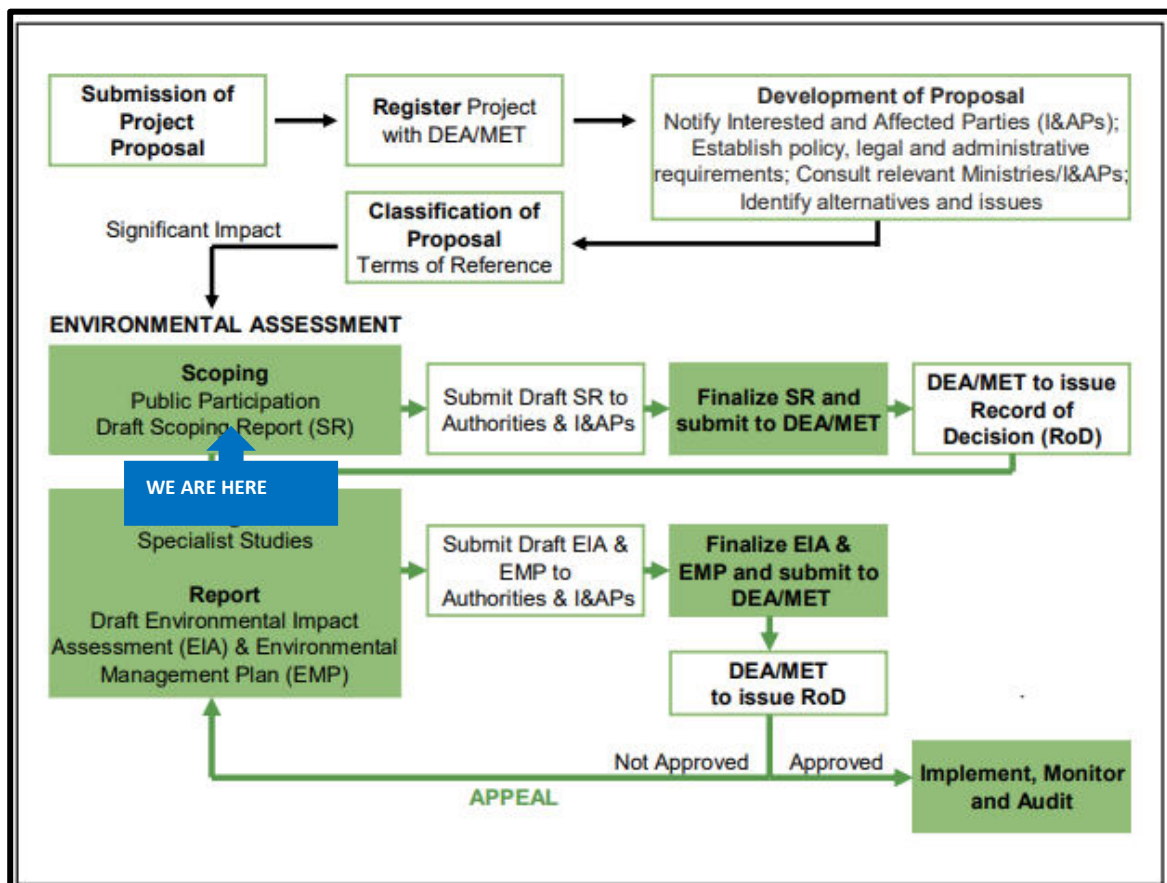


Figure 1: Namibia's EIA process

The methodologies adopted for conducting this EIA process are as follows:

1.3.1 Baseline study

Desktop research was used to establish an environmental information database for the EIA process. Accessed materials include books, articles, maps, internet sources, photographs, GIS datasets, past EIA reports, feasibility studies for the landscape, and baseline reports of the area.

1.3.2 Site Screening

Site screening activities were conducted before the EIA Scoping period to verify and complement information gathered from desktop studies. The fieldwork covered all relevant components of the ecological, socio-economic, and health components of the environment.

1.3.3 Scoping

The scoping was conducted to determine which aspects to focus on during the assessment as well as the information about the proposed project based on the following scoping procedures:

- Identification of key assessments to be conducted based on project type and scope;
- Identify Interested and Affected Parties (I&APs);
- Publicizing the EIA process and registration of I&APs;
- Distribution of the BID to the I&APs and key stakeholders;
- Public and stakeholder consultation through the various modes of communication

1.3.4 Consultation with stakeholders

The public participation process component is fundamental to the impact assessment process and is thought of as an important informant of the decision-making process. Experts in relevant fields, leaders of thought in environmental matters, organs of the state, and community members have been consulted for their opinions on issues relating to the potential ecological and socio-economic impacts of the proposed project. This provided an opportunity for stakeholders and the public to engage in the process to give comments and express their concerns regarding the proposed project.

1.3.5 Impact assessment and evaluation

The assessment of all associated and potential impacts of the proposed project was carried out using the assessment matrix. The assessment reviews all environmental, social, and economic aspects concerning applicable policies and regulations were also done and formed the basis upon which the EMP was formulated. In addition, the environmental impacts were also assessed based on the International Finance Corporation (IFC) standard methodology, in terms of the probability (e.g., likelihood), scale/extent (e.g., spatial scale), magnitude (e.g., severity) and duration (e.g., temporal scale).

1.3.6 Final Scoping Report and EMP

The final report will be submitted to MEFT: DEA for review and decision making which will be communicated to all I&APs. Additionally, an EMP will be developed that will address environmental management statements for all the project elements and this forms an integral part of the EIA Report.

2. PROJECT DESCRIPTION

2.1 Project location

The proposed development site, (Portion A of farm Divundu Townlands No. 1362) measures approximately 6.01 ha and is located about 7km southeast of the town CBD along the DR to Muhembo boarder post (Figure 2).



Figure 2: Project locality

2.2 Site description

The project site is located approximately 150 meters from the bank of Kavango River on the western part. It is boarded on its north by the Murare Camp of the Ministry of Health and Social Services (MoHSS) and the Divava location on the east. The southern part of the site is a common land where the community and animals access the riverbank.



Figure 3: Adjacent land uses

The site measures 6ha and is currently unoccupied. The larger portion of the site has been de-bushed and is covered with vegetation towards the river side.

2.3 Proposed project activities

2.3.1 Subdivision and Rezoning

In line with Section 63 (2) (3) of the Local Authorities Act, 23 of 1992, the property was alienated to the proponent by way of a private treaty as per the Divundu Village Council Resolution No CR/269/19/08/2022. The proponent has appointed TOYA Urban Planning cc, a registered town planning consultant to carry out the town planning process while G. Marwa Surveyor has been appointed to carry out the surveying of the development site. The proposed Subdivision and Rezoning will be submitted to the Urban and Regional Planning Board (URPB) for approval in line with the Urban and Regional Planning Act of 2018.

2.3.2 Proposed Lodge

The proponent intends to construct and operate an eco-tourism development (lodge) and will be responsible for servicing the land and for the construction and operation of the envisaged lodge. The proposed lodge design has not yet been completed but the intention is to design a lodge that offers a relaxed and tranquil camp environment. The facilities are constructed using local materials (Mopane) that are branded into a building techniques and craftsmen. The proposed lodge operation will also be accompanied by tourist services.

- Visit traditional homesteads, experience people and culture.
- Visit agricultural projects.
- River tours

All services are to be offered in line with the relevant legislations and as per approval of the National Tourism Board (NTB).

2.4 Need and desirability.

The need for the proposed guest farm or similar facility in the area is aligned to the growth of tourism industry in Namibia. Namibia's Tourism industry has reported an increase in number of tourists in the past years. Kavango-East region is one of the significant tourism areas received a considerable number of tourists. There is no doubt that the proposed guest farm will contribute immensely to the tourism potential by attracting more tourists in the area by opening more tourist routes and offering accommodation and related tourist services. In addition, the project of this nature will also contribute to edu-tourism which is vital to the school go children and ensure sustainability of the tourism industry in the country.

The desirability of the proposed lodge is justified by both direct and indirect benefits as follows.

a). Income generation

- The income generated is used to cover expenditures such as, employee salaries, operational cost, contribution to NTB and re-investment in the farm development.
- Community at large will generate indirect from the establishment through sale of local curios such as pottery, baskets which they sale directly to tourists, especially the international tourists.
- The lodge will contribute to the GDP of the country through other rates and taxes

b). Employment

- The proposed lodge will create employment opportunities during construction and operation phase
- Employees will be constantly trained in different areas for career advancements.
- In-direct employment through spin-off business activities which result into self-employment

c). Training and Development

- Employees are trained and empowered to senior levels
- Educate community on various issues vital to their livelihood
- The developer will use the opportunity to combine conservation, development, education with community needs and tourism.

2.5 Project Alternative Assessment

The EIA Regulations stipulate that the EIA process should investigate alternative development options. The following alternatives were considered.

- **No-Go alternative:**

The no-go alternative is the option of not proceeding with the proposed activities. Should the proposed project not proceed, the anticipated minimal environmental impacts from the proposed activities would not occur, but also the anticipated significant social and economic benefits will not occur, thus a missed opportunity that is supposed to improve the livelihood of the local community and contribute to the economic growth. Therefore, in considering the proposed activities, the no-go option is not a preferred option.

- **Land-use alternative:**

The proposed project is located within the DVC which is perceived as one of the fast-growing towns in the relatively new Kavango-East region. Due to its locality the village town has potential for nature-based enterprises activities and already featuring similar lodges.

3. PUBLIC PARTICIPATION PROCESS

3.1 Overview

Public Consultation forms an important component of the Environmental Assessment process. It is defined in the EIA Regulations (2012), as a “*process in which potential interested and affected parties are allowed to comment on or raise issues relevant to, specific matters*” (S1). Section 21 of the Regulations details steps to be taken during a given public consultation process and these have been used in guiding our process.

Formal public involvement has taken place via public consultations and focal meetings, and newspaper advertisements to inform the public regarding the project. The public consultation process has been guided by the requirements of the Environmental Management Act (EMA) No. 7 of 2007 and the process has been conducted in terms of regulation 7(1) as well as in terms of the EMA Regulations of GN 30 of 6 February 2012 and the World Bank EIA standards.

Its overriding goals have been to ensure transparency in decision-making and to:

- ✓ Ensure stakeholder concerns are incorporated in project design and planning.
- ✓ Increase public awareness and understanding of the project and
- ✓ Enhance positive development initiatives through the direct involvement of affected people.

The objective of public participation is to build credibility by instilling integrity and conducting the EIA. Educating the stakeholders on the process to be undertaken and opportunities for their involvement. Building stakeholders by establishing an agreed framework accordingly. This requires accessible, fair, transparent, and constructive participation at every stage of the process. Informing stakeholders on the proposed project and associated issues, impacts, and mitigation and using the most effective and efficient manner to disseminate information.

3.2 Notification and Invitations

The study was subjected to a public participation process (PPP) as defined in the Environmental Management Act 7 of 2007 and EIA Regulations of February 2012. Potential I&APs were notified through newspaper advertisements in accordance with section 21 (2) of the Environmental Regulations of (GG6 of February 2012). Public notices were advertised twice in two local newspapers: New Era 08 and 15 September 2023 and the Confidante newspaper for 08 and 15 September 2023.

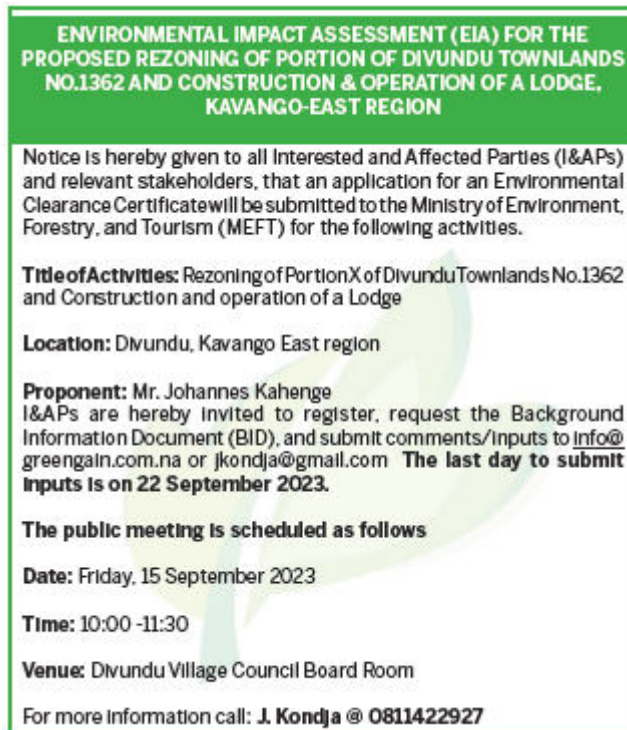


Figure 4: Samples of public notices

The public notices will also be placed on the Village Council office noticeboard and at public offices around town and at the development site. The public notice provides brief information about the proposed project and the EIA and invites potential I&APs to register and/or send comments for consideration.

3.3 Public Meeting

The public consultation meeting was held on Friday 15 September 2023 at Divundu Village Council (DVC) office at 10:30. The meeting was attended by DVC officials, proponent and a few residents. During the meeting, the EAP gave a presentation on the intended development and the EIA study being undertaken. Attendees were requested to ask questions and give their input on the proposed development. These inputs were compiled and will be incorporated into the Scoping report. The attendees also visited the project site to familiarize themselves with site settings.

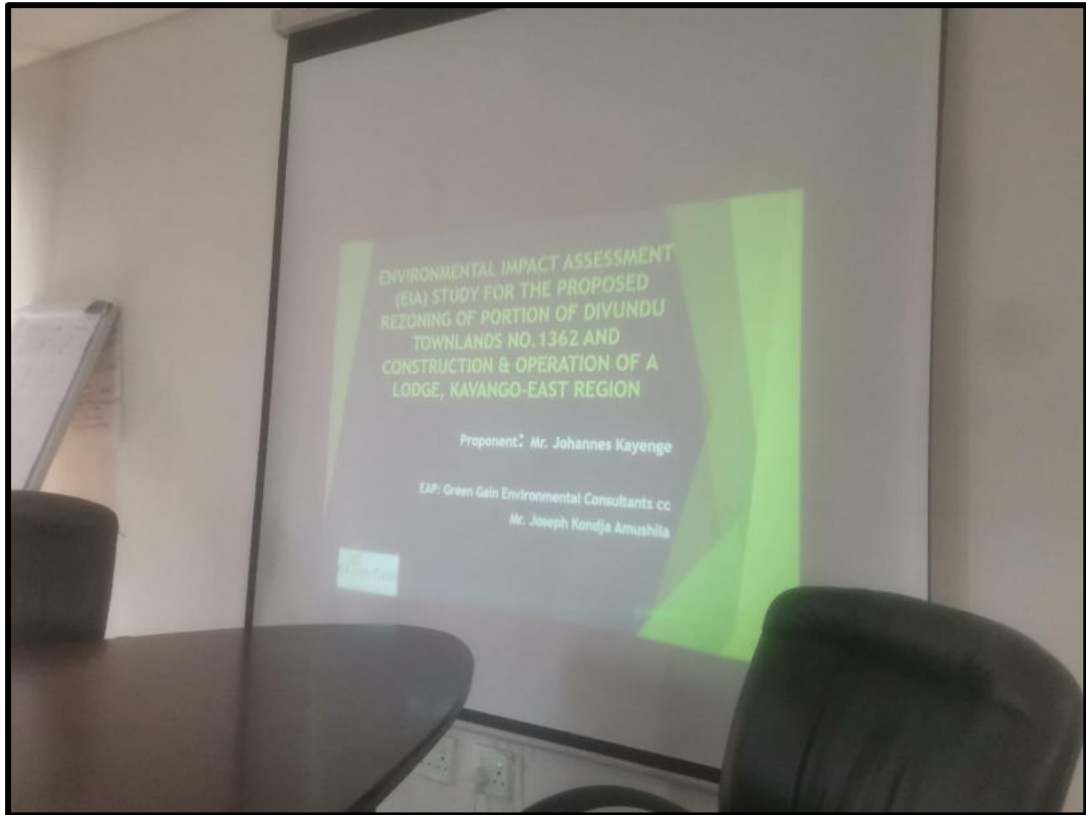


Figure 5: Photograph taken during the public participation meeting,

3.4 Summary of issues raised during the consultation period.

There were no objections received during the consultation process either from the I&APs or stakeholders. It was mentioned that the proposed development is in fact good for the community and will stimulate economic opportunities for the village town.

4. POLICY, LEGAL AND ADMINISTRATIVE FRAMEWORK

4.1 Overview

The pursuit of sustainability by an organization is operationalized by a sound policy and legislative framework that gives operating parameters within its sphere of operation. An important part of the EIA is identifying and reviewing the administrative, policy, and legislative situation concerning the proposed activity, to inform the proponent about the requirements to be fulfilled during the construction, operations, expansion, maintenance, and decommissioning of the project.

This section aims to identify, assess, and analyze all the applicable legislative frameworks to the project with a focus on compliance with the legislation at all phases, including international best practices. Relevant legislation, policies, and international statutes applying to the project are highlighted in Table 1, as specified in the Environmental Management Act No.7 of 2007 and the regulations for EIA as set out in the Schedule of Government Notice No. 30 (2012).

4.1 Environmental Management requirements

Impact Assessment Regulation (Government Notice No. 30 of 2012), the proposed activities trigger certain listed activities as follows.

Table 1: Identified list of activities in the EIA regulation concerning the proposed project.

Activity	Description of the Activity	Operation of the Activity
Rezoning from Undetermined to Accommodation	5 Land Use and Development Activities	5.1 Land use Rezoning from agriculture to commercial use
Provision of Water and sewerage system to the lodge	8 Water Resource Development	8.6 Construction of any industrial or domestic wastewater pipeline system - in this case, extending water supply and sewerage networks to the proposed development.
Proposed construction and lodge operation	6. Tourism Development Activities	6.1 The construction of resorts, lodges, hotels or other tourism and hospitality facilities.

4.2 Applicable legal instruments

Table 1: Legislative, Policy, and Administrative Framework

Legislation			Relevant Provisions	Relevance to the Project
Namibian Constitution Amendment Act 34 of 1998	First		<ul style="list-style-type: none"> – “The State shall actively promote and maintain the welfare of the people by adopting policies that are aimed at maintaining ecosystems, essential ecological processes, and the biological diversity of Namibia. It further promotes the sustainable utilization of living natural resources basis for the benefit of all Namibians, both present and future.” (Article 95(I)). 	<ul style="list-style-type: none"> – Sustainable development should be at the forefront of the management of forestry products. – Through the implementation of the environmental management plan, the proponent will ensure conformity to the constitution in terms of environmental management and sustainability.
Environmental Management Act 7 of 2007			<ul style="list-style-type: none"> – Requires that projects with significant environmental impacts are subject to an environmental assessment process (Section 27). – Requires adequate public participation during the environmental assessment process for interested and affected parties to voice their opinions about a project (Section 2(b-c)). – Detail's principles are to guide all EIAs. 	<ul style="list-style-type: none"> – This Act and its regulations should inform and guide this EIA process.
EIA Regulations GN 57/2007 (GG 3812)			<ul style="list-style-type: none"> – Identifies and lists activities that cannot be undertaken without an ECC being obtained (GN 29). – Details requirements for public consultation within a given environmental assessment process (GN No 30 S21). – Details the requirements for what should be included in a Scoping Report (GN No 30 S8) and an EIA report (GN No 30 S15). 	<ul style="list-style-type: none"> – This Act and its regulations should inform and guide this EIA process.
Forest Act No.12 of 2001			<ul style="list-style-type: none"> – Clearance of forest areas, deforestation, afforestation, timber harvesting, or any other related activity. 	<ul style="list-style-type: none"> – The proponent should acquire all necessary permits and license from MEFT before commencing with

	<ul style="list-style-type: none"> - The Act also stipulates conditions for permitting activities, and for the use of forests and forest produce. - Timber harvesting is further listed under the Environmental Management Act of 2007 as an activity that requires an Environmental Clearance Certificate from the Directorate of Environmental Affairs. 	<p>such activities, for example, export, import, marketing, transit, transport, and block permits.</p>
Pollution and Waste Management Bill (draft)	<ul style="list-style-type: none"> - This bill defines pollution and the different types of pollution. It also points out how the Government intends to regulate the different types of pollution to maintain a clean and safe environment. - The bill also describes how waste should be managed to reduce environmental pollution. Failure to comply with the requirements is considered an offense and is punishable. 	<ul style="list-style-type: none"> - The project is being executed in harmony with the requirements of the act to reduce negative impacts on the surrounding environs from waste pollution within regional boundaries.
Soil Conservation Act 76 of 1969	<ul style="list-style-type: none"> - This act makes provision for combating and the prevention of soil erosion, it promotes the conservation, protection, and improvement of the soil, vegetation, sources, and resources of the Republic of Namibia. 	<ul style="list-style-type: none"> - The soil should not be polluted or left unrehabilitated during and after the cooperative operations cease.
Regional Councils Act No. 22 of 1992	<ul style="list-style-type: none"> - This Act set out the conditions under which Councils must be elected and administer each delineated region. - The Act provides powers, functions, and duties of the Councils to include “undertaking the planning of the development of the region/ local authority for which it has been established with a view to physical, social and economic characteristics, urbanization patterns, natural resources, economic development potential, infrastructure, land utilization pattern and sensitivity of the natural environment.” 	<ul style="list-style-type: none"> - The relevant Regional Councils are IA&Ps, thus should be communicated with regularly.
Atmospheric Pollution Prevention	<ul style="list-style-type: none"> - The Act aims at managing air quality, mineral waste, 	<ul style="list-style-type: none"> - Air pollution should be avoided during the operations

Ordinance, 1976	biodiversity, health, and safety.	of the cooperative.
Water Act 54 of 1956	<ul style="list-style-type: none"> - The Water Resources Management Act 24 of 2004 is present without regulations; therefore, the Water Act No 54 of 1956 is still in force: - Prohibits the pollution of underground and surface water bodies (S23(1). - Protection from surface and underground water pollution. 	<ul style="list-style-type: none"> - The pollution of water resources should be avoided during the operations of the cooperative. - The proposed project may require additional water requirements, shall this occur, the proponent should ensure compliance with this Act, for example ensuring that all permits and licenses are in place.
Water Resources Management Act No. 11, 2013, and Water Act 54 of 1956	<ul style="list-style-type: none"> - This Act provides for the management, protection, development, use, and conservation of water resources and the regulation and monitoring of water services and incidental matters. - - The Water Resources Management Act 24 of 2004 is present without regulations; therefore, the Water Act No 54 of 1956 is still in force. - Prohibits the pollution of underground and surface water bodies (S23(1). - Protection from surface and underground water pollution. 	<ul style="list-style-type: none"> - The pollution of water resources should be avoided during the operations of the cooperative. - The proposed project may require additional water requirements, shall this occur, the proponent should ensure compliance with this Act, for example ensuring that all permits and licenses are in place.
Labour Act (No 11 of 2007) in conjunction with Regulation 156, 'Regulations Relating to the Health and Safety of Employees at work'.	<ul style="list-style-type: none"> - This act emphasizes and regulates basic terms and conditions of employment, it guarantees the prospective health, safety, and welfare of employees and protects employees from unfair labour practices. 	<ul style="list-style-type: none"> - The proponent will employ several people from the local and shall ensure securing a safe environment and preserving the health and welfare of employees at work.
Public Health and Environmental Act, 2015	<ul style="list-style-type: none"> - The Act provides a framework for a structured uniform public and environmental health system in Namibia. - Under this act, in section 119: "No person shall cause a nuisance or shall suffer to exist on any land or premises owned 	<ul style="list-style-type: none"> - The lodge operations will ensure that there is adequate compliance with the Act through strict compliance to the prevention of public hazard nuisance.

	or occupied by him or of which he is in charge any nuisance or other condition liable to be injurious or dangerous to health.”	– It is however imperative to note that the project itself is a positive drive toward the preservation and protection of public health.
National Heritage Act 27 of 2004	– Section 48(1) states that “A person may apply to the Namibia Heritage Council (NHC) for a permit to carry out works or activities concerning a protected place or protected object”	– Even though it is unlikely for heritage objects to be found on the sites. Provision, as stated in the Act, has been taken into consideration and is summarised in the EMP. Any heritage resources discovered would require a permit from the NHC for relocation.
Convention on Biological Diversity (1992)	– Article 1 lists the conservation of biological diversity among the objectives of the convention.	– Timber harvesting should consider the impact it will have on the biodiversity of the area.
Namibia Tourism Board Act, 2000 (Act No. 21 of 2000),	-Effective from 1 February 2005 any person conducting or intending to conduct any business falling within a category set out in the Schedule is required to hold in respect of such business a certificate of registration issued in terms of section 24 of the Act.	– The proponent should apply for a Permit form the NTB

5. DESCRIPTION OF THE RECEIVING ENVIRONMENT

Baseline information for the proposed project site, the DVC and the Kavango-East region at large were reviewed to identify and assess the environmental aspects of the receiving environment. The Kavango region has since been split to form two regions: Kavango East and Kavango West. The assessment below covered aspects of the Kavango region the socio-economic settings and biophysical aspects of the two regions before the split.

5.1 Social environment

5.1.1 About the area

Divundu is in the electoral constituency of Mukwe and is governed by a Village Council. The proclaimed townland section of the beautiful town is bordering the Kavango River from the north to south. In 2011, the population of the then-Kavango region was estimated at 89, 313 people, which represents 6.4% of the total Namibian population. The region is known for extreme poverty, when compared to other regions in Namibia as highlighted in the multidimensional poverty index report conducted by the Namibia Statistics Agency (NSA, 2011), with 79.6%, while the national multidimensional poverty stands at 43.3%. Conversely, the unemployment rate for youth aged 15 – 34 years old is high in the combined Kavango regions at 52.6%, when compared to the national average for youth which is 43.4%.



Figure 6: Map of DVC townlands

5.1.2 Livelihood within the landscape

About 70% of Kavango's population live within a 10 km-wide ribbon along the river. This is where people first settled due to the availability of water and the suitability of the soils and pastures for farming. Settlements have developed to the south of the river, but living conditions in small, remote villages away from the river and main roads are difficult (Haindongo *et al.*, 2019).

Most of the region's inhabitants are engaged in some form of agricultural production, primarily small-scale farming of mahangu (pearl millet) on a few hectares, with small numbers of goats and cattle. Livelihoods are thus considerably diversified, with residents relying also on wages and salaries, pensions, and cash remittances. According to Maarit T and Brian T. J (2013), small-scale mahangu farms provide some food self-sufficiency but little food security and no opportunities for economic development or poverty reduction.

On the other hand, livestock provides an important source of draught power for cultivation, meat, and milk. Perhaps more importantly, the household cattle herd is regarded as a form of savings. According to the NSA, cattle and poultry are the most important assets in terms of livestock (NSA 2013). Fish are an important source of protein for people living close to the Okavango River.

5.1.3 Forest resource availability

Namibia's forests are known to be dry, semi-open to open woodlands which occur mainly in the deep Kalahari Sands, in the north-central and northeastern parts of the country. The development of woodlands in Namibia is mostly affected by the types of soils, availability of moisture, and the occurrence of fire, among other factors. Kavango West and Kavango East Regions are known to have the highest wood volume, which is about 34% of Namibia's standing stock of wood, suggesting a potential for the proposed project. The dominant tree species in the landscape are the Zambezi Teak, *Wild Syringa*, African Rosewood, *Mopane Colophospermum*, *Kiaat*, Marula, *Silver Cluster-Leaf Terminalia sericea* and Mangetti tree as identified by the DEAF. If the woodlands are managed sustainably, they are an important source of resilience for rural people in the region, which can support households. In return, this will absorb and assist to recover from climatic or economic tragedies, thus contributing to resolving the underlying causes of food insecurity and poverty reduction. In addition, the feasibility study has identified Katope Community Forest as the primary source of round wood with over 420,000 m³ of growing stock out of which 15% can sustainably be harvested to produce timber for the proposed cooperative.

5.2 Biophysical Environment

5.2.1 Climate conditions

Climatic conditions may have a major influence on the ecology, including the forest within the vicinity of the proposed project. The proposed project is within the semi-arid eco-region which is characterized by low, erratic rainfall and long spells of dry weather. Temperatures are generally warm with average maximum temperatures above 30° Celsius in all months except May, June, and July months. Rainfall within the proposed project vicinity is higher than in most other parts of the country, some environmental constraints could interfere with development. Rainfall in the region is variable and unpredictable with the annual average being less than 475 mm in the southernmost part of the region and greater than 550 mm in the northernmost part.

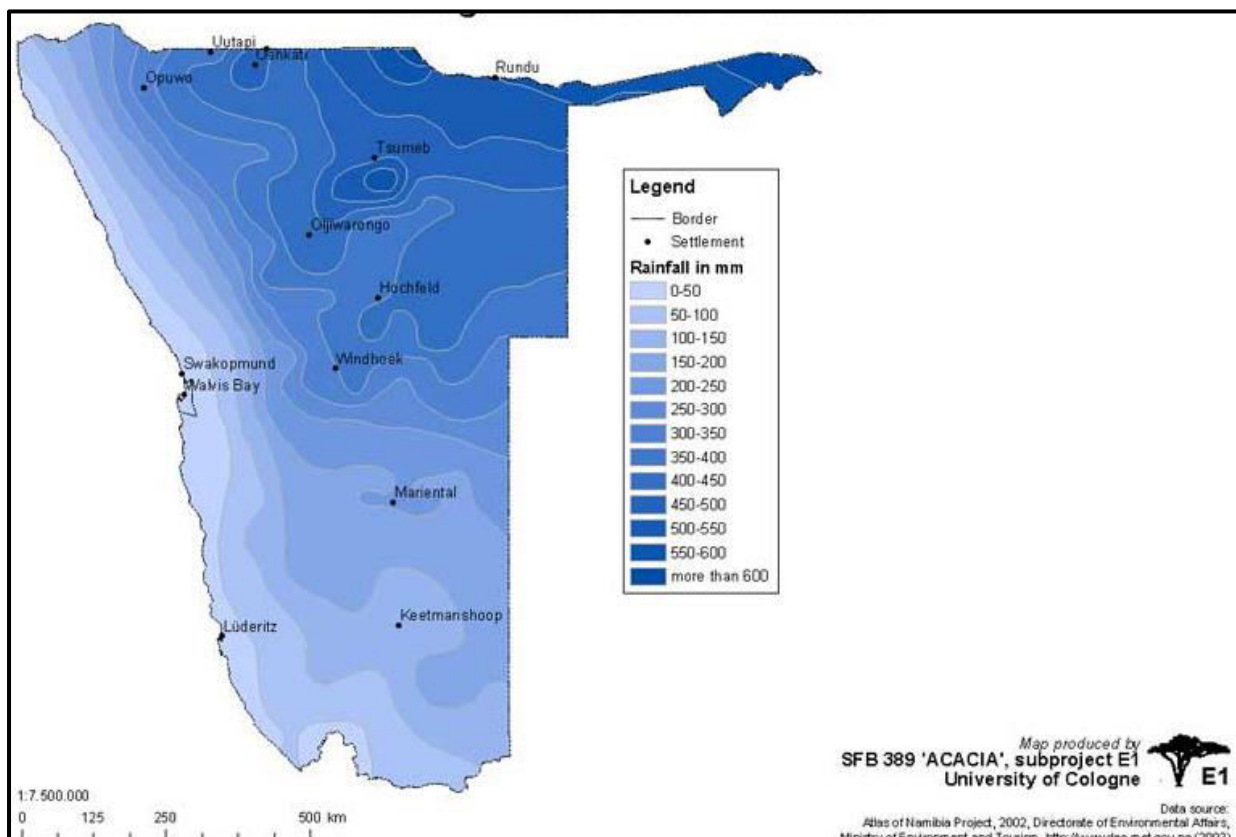


Figure 7: Climatic map of Namibia

5.2.2 Topography and landscape

The landscape and topography are within the northern Kalahari handhelds typically characterized by extreme flatness with a gradient towards the Okavango River. Drainage lineage in the proposed is typically poorly developed with only a few drainage lines between some of the area, locally known as omurambas which supports the community forest.

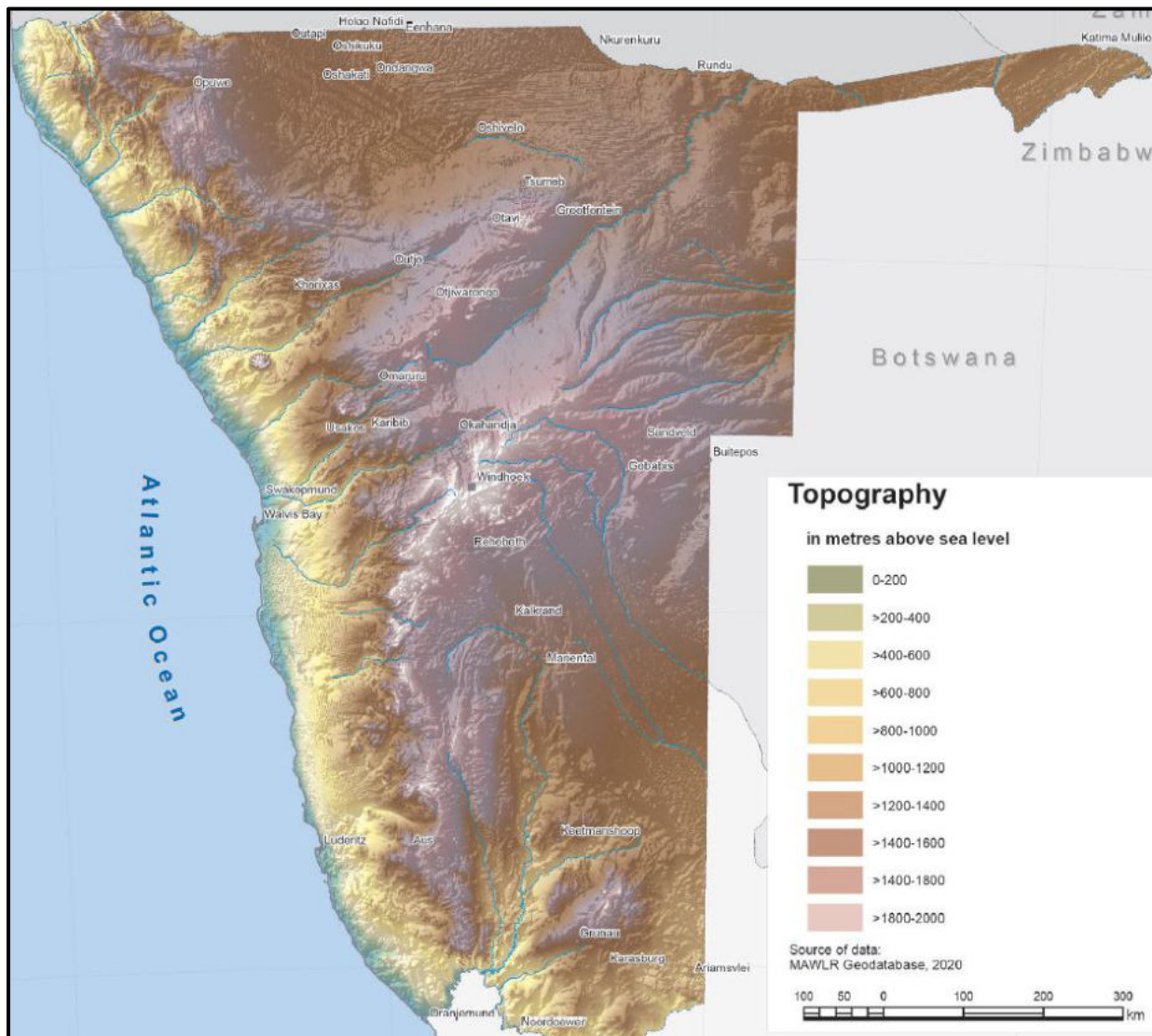


Figure 8: Topography map of Namibia

5.2.3 Geology

The overall area within the proposed project can be described as basal rocks of the Damara sequence followed by Karoo sequence sediments, overlain, and intruded by volcanic of Karoo age and covered by cretaceous Kalahari group sediments which is crucial in supporting the vegetation in the surrounding. It is also known that the overall patterns of groundwater movement are constant, with the topography of the water table surface indicating the main direction of groundwater movement and the location of the recharge area.

5.2.4 Soil

Within the vicinity of the proposed project, typically, the soils are arenosols which are deep and very pure sands with little nutrients, but still sufficient to support the vegetation. It appears that heavier textured soils have formed only in the which have more nutrient-rich soils. The soils within the area are characterised as sandy and low in nutrients with more fertile soils suited to agricultural production which are concentrated in small areas along the Okavango River, omiramba, and valleys, with a soil that has low fertility.

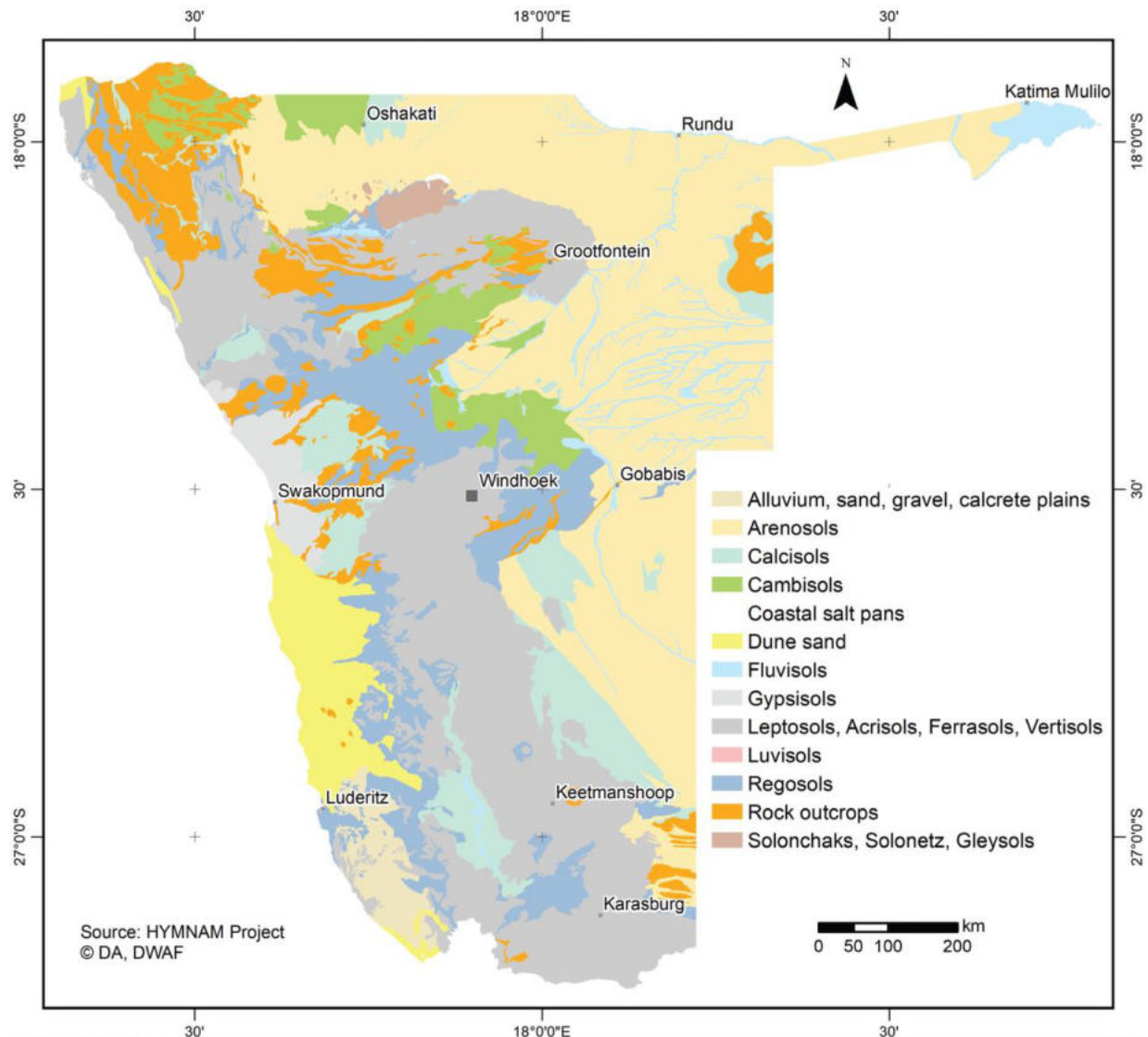


Figure 9: Soil map of Namibia

5.2.5 Water

In terms of water supply in the region, the Okavango River serves as the major source of water, however, the regional aquifer serves as a very reliable source of groundwater accessed through boreholes supplied by MAWF, through community-based water point committees. The proposed project may require drilling a borehole to meet its water demand – shall this occur, the drilling and abstracting permits should be in place before the work commence to ensure full compliance.

5.2.6 Flora

The proposed project area and the vicinity have vegetation that comprises of medium to tall woodland savannah. The vegetation of the site is mostly thorn bushes of acacia species and dotted with few medium sized trees of the Kavango woodland such as *Combretum imberbe* (lead wood), *Terminalia sericea* and *Boscia albitrunca* (*Omunkuzi*) which are protected under the Forest Act 12 of 2001.



Figure 10: Vegetation of the site

5.2.7 Fauna

Given the site's locality and its proximity to the settlement, the site is somehow disturbed. Hence, there are no sensitive habitats or fauna with territorial needs known or expected to occur within the proposed development site. The only fauna expected on site are domestic animals (cattle and goats), and avifauna that are habituating on the riparian vegetation in proximity of the site as well as small animals such as soil-burrowing animals i.e., ground squirrels, local birds, and reptiles.

It is worth noting that the region has a great variety of wildlife and natural vegetation resources which are mostly and/or simply divided between those along the Okavango River and inland and to the south in the woodlands that grow on sandy soils.

6. IMPACTS ASSESSMENT

6.1 Overview

The EIA Regulations require “a description of the significance of any significant effects, including cumulative effects, which may occur as a result of the undertaking of the activity”. This chapter describes the assessment methodology utilized in determining the significance of the management, location, and operational impacts of the proposed lodge. It is highly recommendable that an Independent Environmental Control Officer (ECO) should be appointed to implement and monitor compliance with the EMP to prevent, minimize, and mitigate negative impacts that may arise from the project. The EMP has been developed to address all the identified expected impacts (Appendix C) – it is a legal live document that can be updated when required and/or as the project progress with the aim for continuous improvement to address potential impacts.

6.2 Assessment of Impacts

This section sets out the overall approach that was adopted to assess the potential environmental and social impacts associated with the project. To fully understand the significance of each of the potential impacts each impact must be evaluated and assessed. The definitions and explanations for each criterion are summarised in Tables 2 and 3 below.

Table 2: Assessment Criteria

CRITERIA	DESCRIPTION			
	National (4)	Regional (3)	Local (2)	Site (1)
EXTENT	The whole country	Kavango region and neighboring regions	Within a radius of 2 km of the development site.	Within the development site
DURATION	Permanent (4) Mitigation either by man or natural process will not occur in such a way or such a period that the impact can be considered transient	Long-term (3) The impact will continue/last for the entire operational life of the development but will be mitigated by direct human action or by natural processes thereafter.	Medium-term (2) The impact will last for the period of the project phase, whereafter it will be entirely negated	Short-term (1) The impact will either disappear with mitigation or will be mitigated through a natural process in a span shorter than the construction phase
INTENSITY	Very High (4) Natural, cultural, and social functions and processes are altered to extent that they permanently cease	High (3) Natural, cultural, and social functions and processes are altered to extent that they temporarily cease	Moderate (2) The affected environment is altered, but natural, cultural, and social functions and processes continue albeit in a modified way	Low (1) The impact affects the environment in such a way that natural, cultural, and social functions and processes are not affected
PROBABILITY	Definite (4) The impact will certainly occur	Highly Probable (3) Most likely that the impact will occur	Possible (2) The impact may occur	Improbable (1) The likelihood of the impact materializing is very low

Adopted from IFC (2012)

Table 3: Impact Significance

Low impact	A low impact has no permanent impact of significance. Mitigation measures are feasible and are readily instituted as part of a standing design, construction, or operating procedure.
Medium impact	Mitigation is possible with additional design and construction inputs.
High impact	The design of the site may be affected. Mitigation and possible remediation are needed during the construction and/or operational phases. The effects of the impact may affect the broader environment.
Very high impact	Permanent and important impacts. The design of the site may be affected. Intensive remediation is needed during the construction and/or operational phases. Any activity which results in a “very high impact” is likely to be a fatal flaw.
Status	Denotes the perceived effect of the impact on the affected area.
Positive (+)	Beneficial impact
Negative (-)	Deleterious or adverse impact.
Neutral (I)	The impact is neither beneficial nor adverse
It is important to note that the status of an impact is assigned based on the status quo. Therefore, not all negative impacts are equally significant.	
Significance Rating Scale	
Points 1-4	Insignificant/low
Points 5-8	Significant /Moderate
Points 9-12	Very significant/High.
Points 13-16	Highly significant /Very high

Adopted from IFC (2012)

6.2.1 Potential impacts during the construction phase

Table 4: Identified impacts and mitigation measures during the construction phase

ASPECT AND NATURE OF IMPACTS	POTENTIAL IMPACTS	SIGNIFICANCE RATING (BEFORE MITIGATION)				SIGNIFICANCE (WITH MEASURES)	MEASURES
		Extent	Duration	Intensity	Probability		
1. BIOPHYSICAL Negative impacts	Impacts on flora The project site is covered with vegetation which includes both large and juvenile trees, including protected tree species. Moreover, construction activities will generate a significant amount of dust. Hence, the deposition of fugitive dust onto the plant leaves can affect the plant transpiration and respiration and may lead to decreased productivity of the adjacent vegetations.	1	3	2	2	8	<ul style="list-style-type: none"> ✓ Do not cut down all the trees, leave as many trees as possible for conservation purposes and to maintain the aesthetic view of the site. ✓ Provide dust control measures i.e., sprinkling with water. ✓ Construction work should cease during strong winds occasions. ✓ Consult with DoF to assist with forest resources count on the project site to determine the number of woody species affected. ✓ The proponent is liable to pay the cost implications in favour of the affected woody species.
	Impacts fauna The process of vegetation clearance will cause fragmentation of certain habitats for local fauna occurring on the site. Noise and vibration from construction activities may also disturb the local fauna.	1	3	1	1	6	<ul style="list-style-type: none"> ✓ Site is somehow disturbed due to its proximity to the settlement, thus there are no sensitive habitats. ✓ Only vegetation directly affected by the development should be cleared. ✓ Avoid killing or trapping, chasing, or injuring any animal crossing or found along with development site.
	Soil disturbances from excavation, digging, and	1	1	1	1	4	<ul style="list-style-type: none"> ✓ Minimise soil disturbances.

ASPECT AND NATURE OF IMPACTS	POTENTIAL IMPACTS	SIGNIFICANCE RATING (BEFORE MITIGATION)				SIGNIFICANCE (WITH MEASURES)	MEASURES
		Extent	Duration	Intensity	Probability		
	contamination from leaks of oil and grease from machinery.						<ul style="list-style-type: none"> ✓ The topsoil should be kept separate from other construction waste and can be used as filling materials. ✓ All machinery with leaks should be covered with drip trays. ✓ All contaminated sand must be removed and disposed of at the nearest landfill site.
	Waste management. Construction works will generate a substantial amount of waste. If not properly handled it will pollute the surrounding environment.	2	1	2	2	7	<ul style="list-style-type: none"> ✓ The site should be equipped with enough waste containers. ✓ General waste should be collected and disposed of at the nearest dumping site. ✓ Hazardous waste should be kept separate from other waste and transported to the Windhoek landfill site.
	Impact on groundwater This could result from discharging waste, including wastewater into the soil or from contaminated soil	1	1	1	1	4	<ul style="list-style-type: none"> ✓ Provide sufficient ablution facilities at the construction site. ✓ All wastewaters should be contained in a septic tank which should be emptied regularly, and wastewater should be discharged town oxidation ponds. ✓ Contaminated soil must clean up and disposed of as hazardous waste. ✓ Vehicles with leaks should be covered with drip trays.
	Increase energy demand Construction work will increase the local energy demand	1	1	1	1	4	<ul style="list-style-type: none"> ✓ Determine the energy required for construction activities against the available sources. ✓ Consider alternative energy sources i.e., solar panels where possible.

ASPECT AND NATURE OF IMPACTS	POTENTIAL IMPACTS	SIGNIFICANCE RATING (BEFORE MITIGATION)				SIGNIFICANCE (WITH MEASURES)	MEASURES
		Extent	Duration	Intensity	Probability		
	Increase water demand. Construction activities will increase the water demand in the area.	1	1	1	1	4	✓ Construction workers should be sensitized to use water sparingly
2. SOCIO-ECONOMIC Negative impacts	Landscape alteration Clearing the site to pave way for the development will alter the current aesthetic view of the site	1	3	1	1	6	<ul style="list-style-type: none"> ✓ Only vegetation directly affected by the development should be cleared. Large trees that are not directly affected should be avoided to improve the aesthetic view. ✓ If possible, plant some indigenous trees to compensate for the trees lost during site clearance.
	Land use effects Land use impacts during construction could be felt by the adjacent properties.	1	1	1	1	4	<ul style="list-style-type: none"> ✓ The site is quite isolated, thus only minimal effects will be expected. ✓ The construction site must be enclosed and out of bounding for people and animal, except authorized entries.
	Traffic impacts The movement of construction vehicles will increase traffic flow in the area.	1	1	1	1	4	<ul style="list-style-type: none"> ✓ Existing roads should be used as far as possible. ✓ Vehicles must be driven by authorized drivers and at the speed limit. ✓ Heavy construction vehicles must be tagged with reflective marks. ✓ Maintain a log of traffic-related incidents, and sensitization of road users and people living close to the construction site.
	Community Health, Safety, and Security The safety of the public may also be compromised by certain construction activities i.e., uncovered trenches, increase in	1	1	1	1	4	<ul style="list-style-type: none"> ✓ The construction site must be barricaded and out of bounds for the public and visitors. ✓ There must be construction signs

ASPECT AND NATURE OF IMPACTS	POTENTIAL IMPACTS	SIGNIFICANCE RATING (BEFORE MITIGATION)				SIGNIFICANCE (WITH MEASURES)	MEASURES
		Extent	Duration	Intensity	Probability		
	traffic volume generation of dust, noise, and vibration.						
	<p>Occupational health risks. Occupational health hazards are expected particularly among the construction workers who will be present at the site.</p> <p>Workers will be exposed to dust, vibrations, high noise levels, sun exposure (sunstroke), and dehydration during the summer months</p>	1	1	1	1	4	<ul style="list-style-type: none"> ✓ All employees to be part of the construction works should receive training on the nature of their jobs. ✓ Employees should be equipped with appropriate Personal Protective Equipment (PPE). ✓ Ensure that there is a safety representative who is equipped with a first aid kit at the construction site. ✓ Employees should receive health and lunch breaks. ✓ Work should be carried out in line with the National Labour Act 11 of 2007.
	Impact on archaeological setting	1	1	1	1	4	<ul style="list-style-type: none"> ✓ If archaeological or historic remains are discovered, the construction works will immediately stop and inform the National Heritage Council (NHC).
	Noise and Vibration from construction work might be a nuisance to the residents.	1	1	1	1	4	<ul style="list-style-type: none"> ✓ Noise and vibration are expected to be at a minimal level. ✓ Construction works should be limited to daytime hours. ✓ Vehicles and machinery producing excessive noise should receive proper maintenance.
	Air quality could be compromised due to dust from construction works.	2	2	1	1	6	<ul style="list-style-type: none"> ✓ All cement mixing works should be done within an enclosed area. ✓ If the wind speed exceeds 40 km/hr, work must cease.

ASPECT AND NATURE OF IMPACTS	POTENTIAL IMPACTS	SIGNIFICANCE RATING (BEFORE MITIGATION)				SIGNIFICANCE (WITH MEASURES)	MEASURES
		Extent	Duration	Intensity	Probability		
	<p>Impact of temporary construction camps and laydown areas. Improper positioning of construction camps and workshops could result in several environmental impacts such as pollution and contamination of the soil from spills and leaks of oil and lubricants. Placing construction camps and workshops next to residential areas could result in a nuisance to the residents.</p>	1	1	1	1	4	<ul style="list-style-type: none"> ✓ Construction site must be placed at a site with impermeable surface. ✓ The laydown area shall be situated far from the existing offices and residential areas. ✓ There must be adequate ablution facilities on site. ✓ Ensure regular emptying of septic tanks
	<p>Migrant construction workers and the danger of HIV/AIDS and COVID-19</p>	1	1	1	1	8	<ul style="list-style-type: none"> ✓ Provide health education and awareness. ✓ Qualified locals should be given priority.
Positive impacts	<p>Employment opportunities The construction phase of the project will create temporary job opportunities.</p>	2	2	2	2	8	<ul style="list-style-type: none"> ✓ Qualified locals should be given priority. ✓ Equal opportunities should be given to both men and women.
Positive impacts	<p>Business prosperity Equally, the construction phase will create secondary business opportunities for local businesses</p>	2	2	1	1	6	<ul style="list-style-type: none"> ✓ Local qualified businesses should be given priority. ✓ If available, construction materials should be sourced from local suppliers.

6.2.2 Potential impacts during the operation phase

Table 5: Environmental impacts and mitigation measures during the operation phase

ASPECT AND NATURE OF IMPACTS	POTENTIAL IMPACTS	SIGNIFICANCE RATING (BEFORE MITIGATION)				SIGNIFICANCE (WITH MEASURES)	MEASURES
		Extent	Duration	Intensity	Probability		
1. BIOPHYSICAL	Impact to local biodiversity (flora and fauna)	1	1	1	1	4	<ul style="list-style-type: none"> ✓ No disturbance to animals in the surrounding ✓ Only authorized recreational fishing is allowed upon receipt of permission from the relevant authority
	Soil disturbances and contamination from waste oil and other lubricants if not properly handled.	1	1	1	1	4	<ul style="list-style-type: none"> ✓ The majority of the site shall be sealed. ✓ The workshop surface should be covered with impermeable surfaces i.e., industrial mats. ✓ Vehicles and machinery with leaks should be covered with drip trays. ✓ Contaminate soil should be collected and disposed of as hazardous waste.
	Waste generation The factory will produce different types of waste ranging from general waste to industrial waste.	1	1	1	1	4	<ul style="list-style-type: none"> ✓ The site must be equipped with waste collection bins. ✓ General household waste should be collected and disposed of at the nearest dumpsite ✓ Hazardous waste should be collected and transported to the Windhoek landfill site.

ASPECT AND NATURE OF IMPACTS	POTENTIAL IMPACTS	SIGNIFICANCE RATING (BEFORE MITIGATION)				SIGNIFICANCE (WITH MEASURES)	MEASURES
		Extent	Duration	Intensity	Probability		
	Impact on groundwater Contamination of groundwater could occur through the contamination of drainage water and pollution of soil.	1	1	1	1	4	<ul style="list-style-type: none"> ✓ Much of the site shall be sealed. However, a stormwater management system shall be put in place to manage stormwater within the facility.
2. SOCIO-ECONOMIC Negative impacts	Land use effects The operational phase of the factory could result in some land use effects and competition i.e., competition over resources such as land, water, energy etc. This could result in serious conflicts and could damage the project's reputation and relations with the community.	1	2	2	1	6	<ul style="list-style-type: none"> ✓ All complaints, including verbal ones, should be recorded into the complainant register and resolved within a reasonable time frame. ✓ Ensure regular meetings with the community to obtain input. ✓ Establish demand management for scarce resources such as water and ensure to operate within the required threshold.
	Occupational health risks Employees are exposed to several health risks due to the presence of running engines, hot metals, sharp objects etc. Moreover, poor handling of chemicals could also pose serious health risks. The risk of exposure could be aggravated by factors such as the lack of knowledge or concentration, lack of protection etc.	1	1	1	2	5	<ul style="list-style-type: none"> ✓ Provide regular service of machinery. ✓ Employees should work according to normal working hours as prescribed in the National Labour Act 11 of 2007. ✓ Employees should undergo training and aptitude tests on machinery and equipment to be used.
	Hygiene and sanitation The lodge operation is expected to generate a certain quantity of liquid waste from wastewater as a result of cooking, cleaning, ablution facilities and showers. The farm operation is expected	1	1	2	2	6	<ul style="list-style-type: none"> ✓ Rules regarding the hygiene and housekeeping at the lodge must be developed and strictly adhered to. Attention must be paid to the types of floor and toilet cleaners/chemicals that are used at the site.

ASPECT AND NATURE OF IMPACTS	POTENTIAL IMPACTS	SIGNIFICANCE RATING (BEFORE MITIGATION)				SIGNIFICANCE (WITH MEASURES)	MEASURES
		Extent	Duration	Intensity	Probability		
	to generate a certain quantity of liquid waste from wastewater as a result of cooking, cleaning, ablution facilities and showers						<ul style="list-style-type: none"> ✓ Only recommended bio-degradable chemicals maybe used for cleaning of toilets, basins, floor, etc. This is to ensure that the chemicals used are not harmful to the bacterial in the septic tank and that are safe for human inhalation. ✓ In the kitchen, a mesh “waste trap” must be placed in the drain where kitchen water flows into, this trap helps to trap kitchen off-cuts such as scraps of meat, vegetables etc.
	Traffic impacts The process of transporting logs to the factory and finished products to customers will slightly increase the traffic flow in the surrounding.	1	1	1	1	4	<ul style="list-style-type: none"> ✓ There must be a proper design depicting entry and exist points at the site. ✓ There must be security control and all trucks and vehicle entering the site must pass through the security check.
	Security risks The facility could attract criminal activities in the area if not properly secured.	1	1	1	1	4	<ul style="list-style-type: none"> ✓ There are already similar lodges in the area. However, <ul style="list-style-type: none"> ○ The entire boundary of the site must be enclosed in a wire mesh fence. ○ Provide security measures during the operation phase.
Positive impacts	Employment opportunities	2	2	2	2	8	<ul style="list-style-type: none"> ✓ Preferences should be given to locally qualified people. ✓ Provide training to underqualified locals to promote skills.

ASPECT AND NATURE OF IMPACTS	POTENTIAL IMPACTS	SIGNIFICANCE RATING (BEFORE MITIGATION)				SIGNIFICANCE (WITH MEASURES)	MEASURES
		Extent	Duration	Intensity	Probability		
	Income generation for the cooperative members and employees	2	2	2	2	8	✓ All employee-related issues should be handled in terms of the National Labour Act 11 of 2007.
	Economic development of the area and contribution to the country's GDP.	2	2	2	2	8	<ul style="list-style-type: none"> ✓ Ensure a good relationship with the community and all stakeholders. ✓ Only finished products should be exported as far as possible.
	Business prosperity The operational phase of the project will present various secondary business opportunities such as transporting, supplies, consulting, etc.	2	2	2	2	8	✓ Consider local supply as far as possible

7. CONCLUSION AND RECOMMENDATIONS

7.1 Conclusion

The objective of the Scoping phase of the EIA study was to define the range of the environmental impact assessment and to determine the need to conduct any specialist study. It is believed that this objective has been achieved and the study can be concluded at the Scoping level. The competent authority will review the predicted impacts and associated management actions required to avoid, minimize or mitigate the negative impacts and/or to enhance the benefits of the proposed project.

The environmental assessment process has not identified significant social and environmental impacts resulting from the proposed project activities. There were social impacts directly and indirectly associated with increased job opportunities and the social upliftment accompanied by economic development in Divundu. Further analysis has identified social and environmental benefits which include but are not limited to employment creation, tourist development and increase in economic growth. However, by using the best practice and mitigation measures as identified to avoid and reduce the impact as far as reasonably practical, the effects on the society and environment were deemed not significant, localized, and of short duration.

7.2 EAP recommendations

a) Recommendations to the Proponent

- Consult with DVC to conduct a forest resource count on the proposed development site to establish the quantity of woody resources onsite and to obtain a Forest Permit to cut down the affected trees of the protected species.
- Oversee the implementation of the EMP during the construction, and operation of the proposed lodge.
- Apply for the Operation Permit from the NTB prior to commencement of the lodge operation.
- Obtain all necessary permits such as Liquor licence from the Liquor Board and Fitness Certificate from the DVC
- Provide training to all employees before the commencement of work. The training should focus on the nature of the job, machinery operations, and environmental, health, and safety risks.

b) Recommendation to DVC

- DVC in collaboration MEFT-Directorate of Forestry (DoF) shall oversee the land clearance to ensure compliance with the Forest Act 12 of 2001.
- When deemed necessary, attach any condition/s to ensure environmental compliance and for the proposed project to meet statutory requirements.
- Authorize the issuance of the ECC for the proposed Subdivision and Rezoning of Portion D of Farm Divundu Townlands No.1352 and Construction and Operation of the proposed lodge, Kavango-East region.

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9. APPENDICES

- 9.1 Appendix A: Proof of Consultation**
- 9.2 Appendix B: Consent Letter from TA**
- 9.3 Appendix C: EMP**