

Environmental Management Plan (EMP)

For an **Existing** Recreational Facility and Related Services on Portion A of Erf 4831,
Eros Park, WINDHOEK



For

Open Range Marketing CC

January 2021

EXECUTIVE SUMMARY

1. Introduction

Open Range Marketing CC (hereinafter, ORM) – a 100% Namibia owned and managed company has mandated Ekwao Consulting (hereinafter, Ekwao) to handle its application for an Environmental Clearance Certificate (ECC) authorizing process with the Ministry of Environment and Tourism (MEFT). Over the last eight years, ORM has been operating a recreational facility comprising of a camping site and associated services. In terms of Regulation 6 of the Environmental Management Regulations (Government Gazette No. 28-30 of 2012), tourism development activities such as lodges, hotels and camping sites are required to have an ECC.

2. Location and Infrastructures

The recreation facility is located along Schanzen Road – a short and quiet street linking Nelson Mandela Avenue and Dr Kennedy David Kaunda (previously Uhland Street) in Eros Park, Windhoek. It is abutting the Klein Windhoek River on its north to northeast borders and has a single access point via Schanzen Road. There are several hospitality establishments in its neighbourhood including the popular Roofs of Africa and Joe's Beer House.

In terms of services, the recreational facility is fully catered for by the City of Windhoek (CoW) in that its water, electricity and sewerage infrastructures are connected to the network systems of CoW. All household and office waste generated by the facility is also removed from the premises by CoW.

3. Justification for the Activity

Tourism is a crucial sector to the Namibian economy making significant contributions to the GDP year after year. It is also the sector which provides thousands of employment opportunities to many Namibians after the Agricultural sector. Prior to the Covid-19 pandemic, Namibia has enjoyed steady growth in tourist arrivals from the EU, USA and China nationals. It is projected that the tourism sector will rebound when the world returns to the old order.

ORM has developed a top class campground to capture a small fraction of those tourists who pass through Windhoek every year. In fact, the facility is a niche market for those tourists who prefer to stay in non-traditional top tier hotels, i.e. those tourists who prefer to stay in an eco-friendly camping site that prides itself in minimizing its impact on the environment while providing first class services.

4. Environmental Impacts

The promoter has been proactive when developing the facility in the sense that a great deal of environmental sustainability and protection has been considered. The use of permanent structures has been avoided or kept to the minimum. Most of the materials used are fully removable and blend well into the environment without long lasting footprints. All internal routes and walkways

have been neatly paved while parking areas are covered with gravels to reduce incidences of dust pollution and soil erosion.

Passive and low energy light fittings are used throughout. All external lights are shielded with no naked external light allowed which makes the facility energy efficient, but also avoiding the lights becoming visual nuisance to guests and neighbouring residents.

The orientation of the tented units were also carefully considered to ensure that the tents catch the natural light and warm of the sun without the excessive glare and overheating that can result from a direct sun orientation. Tented units have also been placed to utilize the shade afforded by the huge tree canopies which occur on the property. Overall, the facility has therefore a very low impact on the receiving environment.

5. **Social and Economic Impacts**

ORM respects its social responsibility and sustainability as part of its future development for the facility. Prior to the Covid-19 outbreak, the company had about 40 employees on its payroll and retained about 50% of that number throughout the period. In this regard, the facility is therefore contributing towards:

- sustainable tourism;
- sustainable employment;
- expansion of the local economy through payment for tax, levies to NTB, etc.; and
- earning of the much needed foreign currency (US Dollars & Euros).

6. **Public Participation Process**

The EIA was announced through advertisement in local newspapers (two publications). A Background Information Document (BID) which provided information was circulated to identified stakeholders and Interested and Affected Parties (IAPs). In addition, an EIA Notice printed on A3 paper was also pasted at the entrance gate to the site. Due to the Covid-19 pandemic there was no provision made for a public meeting, but all IAPs were asked to submit their comments and concerns to the EIA Consultant by 31 December 2020.

There were no single comment and or input received anyone on the EIA.

7. **Recommendation**

Based on the outcome of this impact assessment, Ekwa Consulting is confident in stating that the existing recreational facility developed and operated by Open Range Marketing CC has a low impact to the receiving environment. It is recommended that an ECC be granted for the facility because its benefits outweigh its limited impacts. The recreational facility has a sound motivation for demonstrating its sustainability, need and desirability. Strict compliance to this EMP is recommended.

Project Name	<p style="text-align: center;">Environmental Management Plan (EMP)</p> <p style="text-align: center;">for an Existing Recreation Facility with a Camping Site and Related Services Situated on Portion A of Erf 4831, Windhoek Blocks, Windhoek</p> <p style="text-align: center;">Windhoek Municipality Khomas Region</p>
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Prepared For	<p>Open Range Marketing CC P O Box 6097 AUSSPANNPLATZ 0001 Windhoek Tel: 061 370 790 Fax:061 370 797 Email: info@openrangemarketing.net</p>
Prepared By	<p>Ekwao Consulting 95 Papageien Road Hochland Park, Windhoek Cell: 081 127 3027 Fax2Mail: 088645026 Email: ekwao@iway.na</p>
Date Prepared	<p style="text-align: center;">January 2021</p>

ABBREVIATIONS AND ACRONYMS

List of Acronyms, Abbreviations and Terms

BAT	Best Available Technology
BID	Background Information Document
CO	Carbon Monoxide
CO ₂	Carbon Dioxide
COVID-19	'CO' - Corona, 'VI'- Virus & 'D' - Disease of 2019
CoW	City of Windhoek
ECC	Environmental Clearance Certificate
EIA	Environmental Impact Assessment
EMA	Environmental Management Act
EMP	Environmental Management Plan
EU	European Union
GPS	Global Positioning System
GRN	Government of the Republic of Namibia
HPP	The Harambee Prosperity Plan
IAPs	Interested and Affected Parties
KRC	Khomas Regional Council
m ²	Square meters
m ³	Cubic meters
MEFT	Ministry of Environment, Forestry and Tourism
MHSS	Ministry of Health and Social Services
NHC	National Heritage Council
NO ₂	Nitrogen Dioxide
NSI	Namibia Standards Institute
PM	Particulate Matter
PPE	Personal Protective Equipment
SABS	South African Bureau of Standards
SHE	Safety, Health & Environment
SME	Small and Medium Enterprises
SO ₂	Sulphur Dioxide
USA	United States of America

Glossary of Terms and Definitions

Anthropogenic Impact:

Human impacts on the environment which include changes to the biophysical environments, ecosystems, biodiversity and natural resources caused directly or indirectly by human activities including global warming, environmental degradation, etc.

Alternatives:

In relation to a proposed activity, it implies different means of meeting the general purpose and requirements of the activity, which may include alternatives to the:

- + property on which or location where it is proposed to undertake;
- + type of the activity being undertaken;
- + design or layout of the activity;
- + technology to be used in the activity, and
- + operational aspects of the activity.

Biodiversity:

The variability among living organisms from all sources including terrestrial marine and other aquatic ecosystem and ecological complexes which they are part of

Cumulative Impact

In the context of mining, means the impacts of mining activities which in themselves may not be significant but may become significant when added to the existing and potential impacts resulting from similar or diverse activities or undertaking in the area.

Decommissioning:

The process which begins after termination or cessation of operational activities and ends with closure. It involves, amongst others, the removal of unwanted infrastructures and surface restoration including ripping and profiling of all internal routes so as to minimise the adverse environmental impacts.

Ecology:

The study of the inter relationship between organisms and their environment.

Environment:

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.

Environmental Impact:

Environmental impact is any change to the environment, whether adverse or beneficial, wholly or partially, resulting from the activities of an organization, its products and/ or services.

Environmental Management Plan (EMP):

A working document on environmental and socioeconomic mitigation measures which must be implemented by several responsible parties during all phases of a proposed development.

Interested and Affected Parties (IAPs):

Any person, group of persons or organisation interested in or affected by an activity contemplated in an application, or any organ of state that may have jurisdiction over any aspect of the activity

Mitigation:

The implementation of practical measures to prevent, reduce or to control adverse environmental effects of a project/development, and include restitution for any damage to the environment, caused by those effects through replacement, restoration, compensation or any other means.

Sensitive Area:

A sensitive area or environment is described as an area or environment where a unique ecosystem, habitat for plant and/or animal life, wetlands or conservation activity exists or where there is high potential for ecotourism.

Watercourse:

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 collection of water which the Minister may by notice in the Government Gazette, declare to be a watercourse, and a reference to be a watercourse includes, where relevant, its bed and banks.

The Promoter:

The promoter is the owner or Management who remains ultimately responsible for ensuring that the site is managed in accordance with the requirements of the EMP, and for any conditions which the Environmental Commissioner may impose throughout the operational phase of the recreational facility

Public Participation Process:

The legislated process in which all potential and interested parties are informed of the proposed project/development in this case the existing site and afforded the opportunity to input, comment and object. Specifics requirements are listed in terms of advertising and making draft reports available for comments

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1. BACKGROUND

1.1 Introduction

Ekwao Consulting (hereinafter Ekwao) has been appointed by Open Range Marketing CC (hereinafter ORM) to handle its application for an Environmental Clearance Certificate (ECC) with the Ministry of Environment, Forestry and Tourism (MEFT). ORM is operating a recreational facility which comprises of these amenities:

- ✚ a camping site, each unit fitted with ample power points;
- ✚ common ablution facilities with separate showers and toilets;
- ✚ a tented camp section;
- ✚ a restaurant complimented by a small bar
- ✚ a pool area with paved surrounds
- ✚ free Wi-Fi connections to guests
- ✚ paved walkways
- ✚ ample gravel covered parking for day and overnight guests

The recreational facility has been in existence for the past eight years and is promoted and marketed as Urban Camp. The ECC is therefore for an **existing** activity and is required for the **renewal** of the Fitness Certificate of Urban Camp by the City of Windhoek.

1.2 Location

Urban Camp is situated in a location referred to as Windhoek Blocks in the Municipality of Windhoek. It is Portion A of Erf 4831 situated along Schanzen Road, a relatively short street that joins two streets named after two prominent African leaders - Nelson Mandela Avenue and Dr Kenneth David Kaunda Street (formally Uhland Street). It is located northwest of Schanzen Road as depicted in Figure 1 and has a single access point from this street.

From the north to the northwest, the site is abutting the Klein Windhoek River with the present river stream located approximately 85 m away (Photos 5). The entire north to northwest border of the site is fenced in with a combination of electric and high security fences.

The southwestern border is approximately 200 m long and is bounded by church premises – the Betlehem Latter Faith Home (Figure 1 & Photo 1). To the southeastern side across Schanzen Road is a general residential complex consisting of high end sectional title units (Photo 3). The residential complex has a single access from Schanzen Road facing the access into the recreational site. The land on which Urban Camp sits is approximately 10 070 square meters (1.07 ha). The total built up area which comprises of roads, walkways, camp site and related infrastructures is approximately 60% of the total area.



Figure 1: Site Location



Photo 1: West – Church Premises (Bethlehem)



Photo 2: Looking SE from the Site Entrance



Photo 3: South – Residential Sectional Title Complex



Photo 4: North to NE – Non-permanent Retaining Wall



Photo 5: East – the Klen Windhoek River

2. ACTIVITY JUSTIFICATION

2.1 Introduction

In this section, the importance and significance of the tourism sector to the Namibian economy is described and illustrated in various ways in order to justify the need for the activity. In the 2019 annual report for the Namibia Tourist Statistics, the aggregated tourist arrivals recorded for the years 2017, 2018 and 2019 were, respectively, 1 499 442, 1 557 279 and 1 681 336. The Hospitality Association of Namibia (HAN) which assists MEFT to compile the annual tourist records has, projected a substantial growth in the tourism industry in the years ahead. According to the Wanderlust Readers Travels Awards of 2019, Namibia was voted the world's top tourism destination. In the same year, the Internationale Tourismus-Börse of Berlin, has voted Namibia the best safari and wildlife destinations. Tourism is therefore a vital sector to the Namibia economy making positive contributions at the rural, local, regional and national levels.

However, whilst the statistics above are impressive, the local tourism industry has been devastated by the outbreak of the COVID-19 with hundreds of jobs lost and many tourist based enterprises partially closed, completely closed down or operating below normal capacities. Projections from leading industry experts are that, the tourism industry will rebound in the long term, but low activities should be expected in the short to medium terms.

2.2 Contribution of Tourism to GDP

According to the publication of World Travel & Tourism Council titled, Travel & Tourism Economic Impact March 2018, the Namibia tourism sector has recorded the following progress:

- ✚ During the year 2017, the tourism sector had made a direct contribution to Namibia's Gross Domestic Product (GDP) of NAD 4.9 billion which is about 2.9% of the total GDP for that year. This contribution is projected to rise to 3.7% of DGP by 2018 – a direct contribution of NAD10 billion.
- ✚ During the same year, 2017, the total direct contribution of the tourism sector to the GDP was NAD23.8 billion or 13.8% of GDP. Total direct contribution is projected to grow by 5.4% per annum contributing a staggering NAD42.6 billion to the GDP by 2020.
- ✚ The total number of jobs directly supported by the tourism sector was 23 000 jobs during 2017. This number of jobs equates to 3.2% of the total jobs in the economy. Employment growth in the local tourism sector is projected at 3.6% per annum hitting job levels of 35 000 jobs by 2028.
- ✚ Direct investment in the tourism sector was 12% of total investments made (NAD4.4 billion) during the financial period ended year 2017. Investment in the tourism sector is projected to grow steadily to amount to N\$7.8 billion or 13% of total investments by 2018.

Namibia has two international airports, Hosea Kuutako International Airport (KHIA) near Windhoek and Walvis Bay International Airport (WIA) near Walvis Bay. Most tourists would arrive in Namibia via HKIA using any of the ten airlines listed below (Figure 3):

- ✚ Air Namibia (our national airline) serving at least 8 destinations
- ✚ South African Airways severing multiple destinations
- ✚ British Airways serving multiple destinations
- ✚ Qatar Airways serving multiple destinations
- ✚ TAAG (Angola) serving one destination
- ✚ Ethiopia Airlines (Ethiopia) serving one destination
- ✚ KLM via Luanda
- ✚ Condor
- ✚ Euro-Wings
- ✚ LTU Airlines

Windhoek therefore serves as one of the essential stops for a significant segment of the international tourists.

2.3 Local Tourists in Numbers

The seven graphic figures depicted on the following pages below were sourced from the “Tourism Statistical Report of MEFT for the period 2018”. The statistical figures are for 2017 and 2018 which, respectively show tourist arrivals of 1 499 443 and 1 557 278 (Figure 2). The figures underscore the importance and significance of the tourism sector to the Namibian economy.

For the period 2017 and 2018, (Figure 4) air travel through HKIA has, respectively, accounted for 24.5% and 24.9% of tourists who arrived in Namibia. In figure 3, the local airline, Namibia Airways had accounted for 34.3% and 41.1% of arrivals, respectively for 2017 and 2018. Windhoek, as the capital city is therefore a gateway to many tourists visiting the country. This also applies to many tourists who prefer to combine holiday and business.

ORM has created a top class campground to accommodate the needs of the multitude of tourists who pass through Windhoek every year. In fact, the facility is focusing on a niche market of those tourists who prefer to stay in non-traditional top tier hotels, i.e. those tourists who prefer to stay in an eco-friendly camping site that prides itself in minimizing its impact on the environment while providing first class services.

The establishment is very popular with tourists from the Scandinavian countries and with the introduction of the KLM Royal Dutch Airlines to Windhoek via Luanda (Angola) in August 2016; ORM has seen a pleasant surge in its bookings from the Scandinavians.

The purposes of visits are broken down in Figure 5 while the age profiles of overseas tourists and the seasons of peak visits are in Figure 6. South Africans and Germans are two top nationals who come to Namibia for holidays followed by Angolans, France, UK and USA nationals.

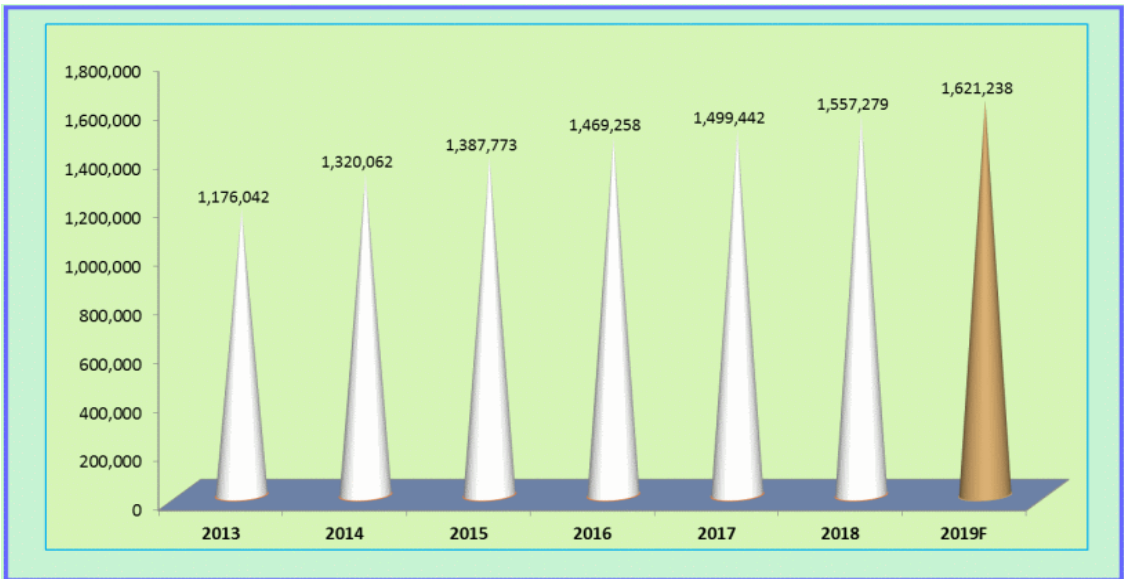


Figure 2: Tourist Arrivals into Namibia by Year

AIRLINES	PERCENTAGE(%) 2017	PERCENTAGE(%) 2018
Air Namibia	34.3%	41.1%
South African Airways	30.1%	21.9%
British Airways	8.5%	6.1%
Qatar Airways	6.9%	8.6%
Other (e.g. TAAG, private jets, etc)	6.8%	5.4%
Ethiopian Airline	4.3%	5.1%
KLM	4.2%	5.5%
Condor	3.3%	2.5%
Euro-Wings	1.2%	2.6%
LTU (Lufttransport-Unternehmen)	0.4%	1.1%
TOTAL	100.0%	100.0%

Figure 3: Tourist Arrivals into Namibia by Airlines

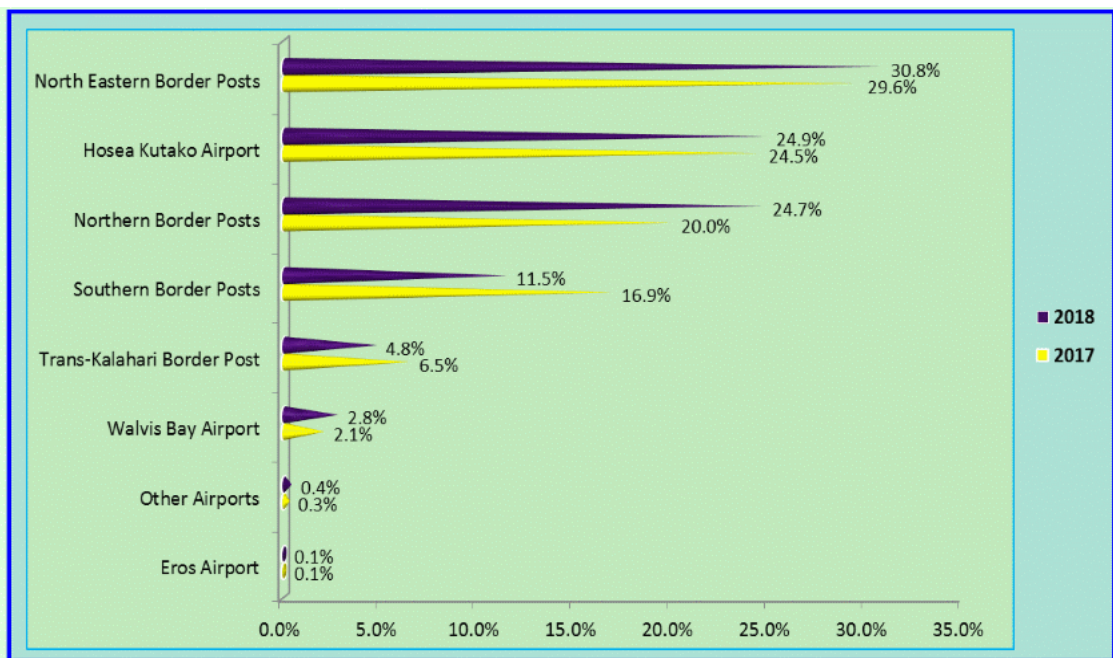


Figure 4: Tourist Arrivals by Entry Points

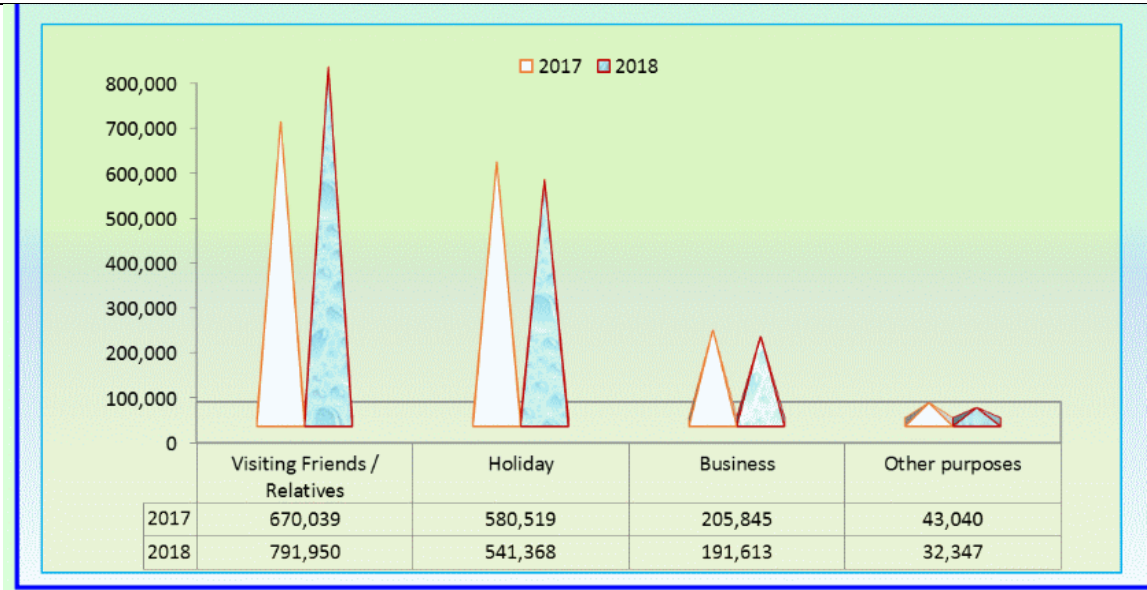


Figure 5: Tourist Arrivals by Purpose of Visit



Figure 6: Tourists Age Profile & Seasonality

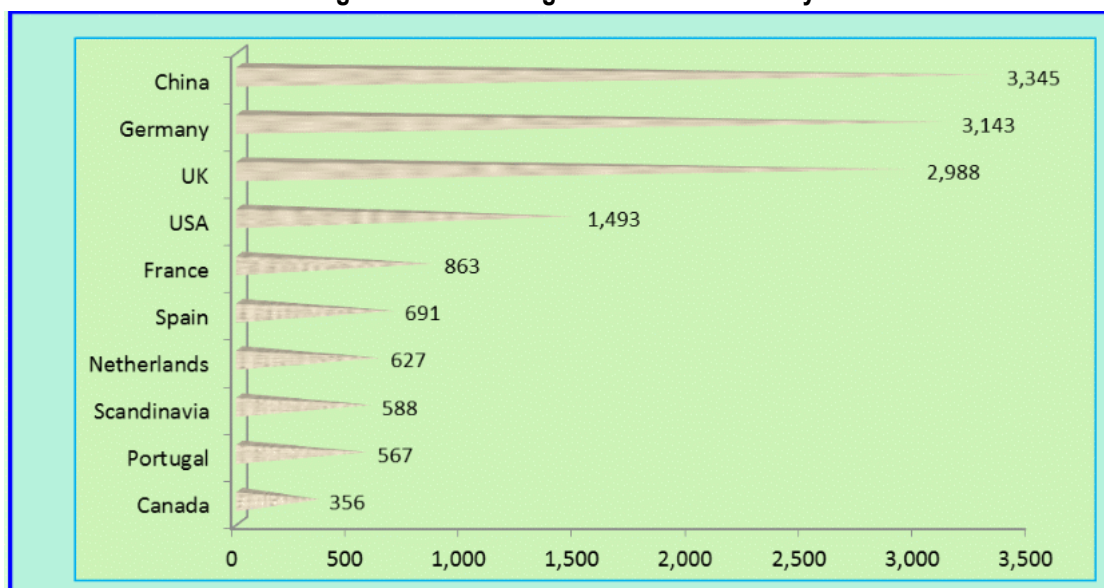


Figure 7: Top ten overseas business tourists

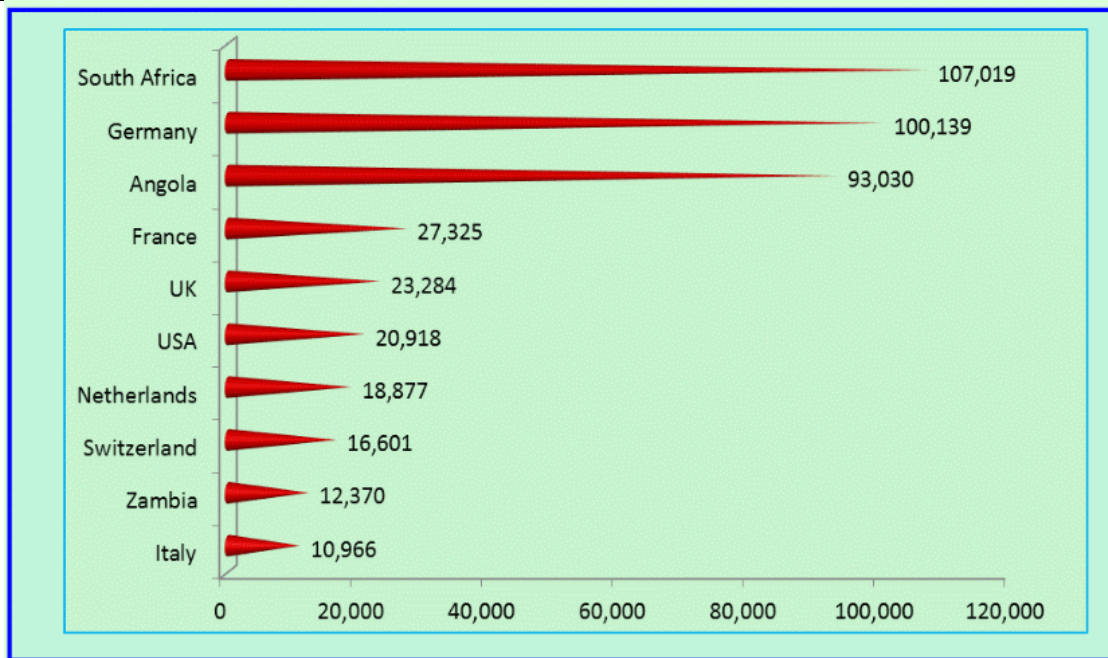


Figure 8: Top ten overseas holiday tourists

2.4 Socio-economic Impacts

At its peak, before the Covid-19 pandemic outbreak, the establishment had on its payroll a compliment of about 40 people in fulltime employment, the majority of whom were youths. The impact of Covid-19 has forced the establishment to reduce the workforce to 20 people at the moment. Nationally, thousands of jobs have been lost in the tourism sector as a result of the pandemic. It is believed that the tourism industry in the world will take some time to recover. For Namibia this could be another 18 months before we welcome those pre-Covid tourist arrivals at HKIA, however there are positive signs on the horizons.

2.5 Scope of the Assessment

Generally, the scope of the environmental assessment for a greenfield project is to determine the potential impacts which the proposed project will have on the receiving environment during its construction, operation and decommissioning. Where positive impacts ensue from the project, possible enhancement measures are proposed. Where negative impacts ensue from the envisaged project, mitigation measures are provided to reduce, minimise to eliminate such negative impacts.

Since this is a brownfield operation which has been in existence for several years, the office of the Environmental Commissioner has waived the conducting of a full scale EIA and requested that the following reports be submitted:

- ✚ a Public Consultation (Participation) Process, and
- ✚ an EMP for the operational phase of the activity.

2.6 Methodology

The objective for the assessment is to identify and assess all possible significant impacts associated with the operational phase of the existing recreational facility and associated

activities. Once the impacts have been identified and or predicted, appropriate mitigation measures have to be established. Mitigation measures are the modification of certain activities in such a way as to reduce the impacts on the environment. The objectives of mitigation are to:

- ✚ find more environmentally sound ways of doing things;
- ✚ enhance the environmental benefits of an activity;
- ✚ avoid, minimize or remedy negative impacts; and
- ✚ ensure that residual negative impacts are within acceptable levels.

When mitigation is considered for certain impacts, it is organized in a hierarchy of actions, namely:

- ✚ avoid negative impacts through the use of preventative measures;
- ✚ minimize or reduce negative impacts to 'as low as practicable' level, and
- ✚ remedy or compensate for negative residual impacts that are unavoidable.

It should be noted that the aim of the assessment process is not to stop the activity or any of its components, but to determine its impacts in order to enhance sustainability and to promote and encourage responsible development as per the provisions of EMA.

The following methods were used to investigate the potential impacts on the social and natural environment as a result of the operational and possible decommissioning of the activity.

- ✚ Baseline information about the site and its surroundings were obtained from primary and existing secondary information.
- ✚ Physical site investigation and visual surveying of the site and the surroundings, layout of the structures and all existing infrastructures.
- ✚ Through discussions/talks with Management and staff.
- ✚ Through the PPP – from Interested and Affected Parties (IAPs) including the neighbouring residents.
- ✚ Through desk studies of similar facilities in Windhoek.

2.7 **Similar Neighbouring Establishments**

There are at least four establishments offering equivalent or similar services within a radius of 400 m of Urban Camp. Sand Rose Bed & Breakfast is at the corner of Schanzen and Brits Street – about 100 m away. Roof of Africa, African Nest Guest House and Ongava Tented Camps are located to the southeast on Nelson Mandela Avenue. The popular Joe's Beer House is also a stone throw away from the facility.

3. ACTIVITY DESCRIPTION

3.1 Introduction

Urban Camp is an existing facility which comprises of the amenities as listed in the introduction section of this report. The day-to-day operational activities are listed as follows:

- ✚ Cleaning of the entire premises and amenities;
- ✚ Reception and administrative functions of the facility
- ✚ Procurement of consumables: beverages and food items and storage thereof;
- ✚ Laundries and related activities;
- ✚ Maintenance activities including tending to the gardens and support infrastructures;
- ✚ Preparing meals for day and overnight clients

There are no immediate plans to expand the facility. The reason for applying for an ECC is for the activity to be harmonised with the provisions of EMA and the bylaws of the City of Windhoek. The main operational activities and or features are briefly described below:

3.2 Lodging Facilities

At Urban Camp, tourists have three choices of accommodation at their disposal. There is a camping section for camping enthusiasts. Each camping unit has a power point, light, shaded area and a braai (Photos 8 & 9). Guests can take a shower in clean communal bathrooms located on the property.

Tourists can also choose to sleep in tented cabins available in two types - the Explorer and Garden Tents as depicted in Photos 6 & 7.

The Explorer is a glamping tent, fully equipped and elegantly furnished with a king sized double bed which comes with white linen with warming blankets, a range of towels, power point, light, fridge, a laptop safe, coffee station and mosquito net. A fan is also available for those hot nights in summer (Photo 10).

A Garden tented cabin comes fitted with two single beds, white linen and warming blankets, towels, power point, a shaded patio, fridge, water kettle and lockable cupboard (Photo 6). A fan is also available. All guests have access to free Wi-Fi internet services.

The establishment has the capacity to accommodate up to 100 guests in its facilities. The facility does not cater for private functions such as conferences, weddings and or parties since these are provided at neighbouring establishments (Roots of Africa & Africa Nest Guest House).



Photo 6: Garden Tented Rooms. Note neat walkways



Photo 7: An Explorer Tented Room



Photo 8: Camping Site Bustling with Guests



Photo 9: A Typical Camping Unit



Photo 10: Inside the Explore Tented Cabin



Photo 11: Scandinavia Tourits Group

3.4 Restaurant, Swimming Pool and Bar

There is a restaurant which offers a buffet breakfast, lunch and dinner from a la carte menu. The seats are arranged around the restaurant patio, swimming pool and under garden umbrellas and gazeboes (Photos 14 & 15). Meals are prepared from an onsite kitchen. A bar is situated at the restaurant and serves drinks to day and overnight guests. A small sized swimming pool is also available for the guests (Photo 15).

3.5 Site Facilities and Auxiliary Infrastructures

There is an onsite office for the Administrative Manager where guests are welcomed and checked in and checked out of the facility. Before the outbreak of the COVID-19 pandemic, Urban Camp has a personnel compliment of 40 people on its payroll. This has now been reduced to about 20 employees.

✚ Site facilities:

- Buildings – there is only one small core building which houses the restaurant, administrative office, kitchen and bar. All other structures are removable.
- Laundry, washrooms and shower facilities
- Pool pump housing
- Storage room for maintenance equipment & tools
- rooms and which includes the

✚ Infrastructures

- Entrance security gate
- Internal routes
- Parking bays/areas
- Paved walkways
- Water
- Electrical
- Communication Access roads

✚ Recreational facilities

- Swimming pool
- Paved pool surrounds
- Landscaped gardens
- Gazeboes and picnic tables
- Pool furniture

The following observations are worth mentioning here. As can be seen from the photographs the promoter has developed the site in such a manner that all infrastructures (tented rooms, camping sites, etc.) are fully removable and without long lasting footprints. As far as practically possible, all external lights are shielded with no naked external lights allowed (Photo 13). Passive and low energy light fittings are being used throughout which make the facility energy efficient.

The orientation of the dwelling units were also carefully considered to ensure that the rooms catch the natural light and warm of the sun without the excessive glare and overheating that can result from a direct sun orientation. Dwelling units have also been placed to utilize the shades afforded by the huge tree canopies which occur on the property.



Photo 12: Entrance gate with a security room



Photo 13: Shielded Lights



Photo 14: A garden around the Restaurant



Photo 15: Swimming Pool Area



Photo 16: Gravel covered parking Areas



Photo 17: Paved Internal Routes and Walkways

4. AVAILABLE SERVICES & INFRASTRUCTURES

4.1 Water Supply

The facility is connected to the water network system of the municipality. The water requirements of the facility do not have a significant impact on the available water resources. It is important though to keep in mind that, water is a scarce resource which should be used sparingly. Over the last few years, CoW has cautioned the residents to save water because the regional dam reservoirs were getting depleted. Where feasible consideration to recycle water should be assessed and the costs involved evaluated.

4.2 Electricity Supply

Urban Camp is drawing electrical power from CoW and its current consumption does not have a significant impact on the available electrical power. There is no backup generator. Management has taken a proactive step by ensuring that the illumination of buildings, parking areas, roadways, entrance, swimming pool areas and walkways has been provided by using low-intensity lighting fixtures. Additionally, fixtures have suitable shielding to prevent the light from escaping. Urban Camp can considerably reduce its electrical energy bill by installing a sized photovoltaic solar system on its premises.

4.3 Sewerage

Sanitary sewerage from the recreational facility is disposed through the local authority's sewerage network. It is believed that the network has adequate capacity to accommodate the current and future amount of sewerage generated. Urban Camp is therefore a custom of the CoW, just as any other consumer of the city paying for its water, electricity, rates and taxes.

4.4 Site Access and Traffic Impacts

The facility has a single access via the Sanchez Road – a short street road linking Nelson Mandela Avenue and Kenneth Kaunda (previously Uhland Street). Sanchez is a minor road with little traffic during peak hours only. The recreation facility does not have a significant impact on the traffic flow on Sanchez.

4.5 Drainage and Stormwater Management

The site is abutting the Klein Windhoek River to the east and northeast. The natural drainage is therefore towards the said river. The promoter has minimised disturbances to ground cover by maintaining natural vegetation including generously landscaping the site with appropriately sized trees, plants and bushes. These measures have significantly reduced erosion and sediment transport during heavy downpours.

To avoid potential flooding of the facility from the adjacent river level rises, a non-permanent retaining wall has been put up on the river side of the property. The wall is made out of boulders mixed with building rubbles and is approximately ± 20 m from the facility boundary and ± 60 m from the centre of the river stream. The wall is about 2.5 m wide by 1.2 m high (Photo 4).



Photo 18: Materials of low impacts



Photo 19: Mode of transport for tour groups



Photo 20: Floral Diversity on the Site



Photo 21: Tourists on bikes



Photo 22: Site closing time



Photo 23: A round table and chairs in the garden

5. THE REGULATORY FRAMEWORK

5.1 Introduction

For Namibia to achieve sustainable development, the implementation of all projects, plans, programs and developments that are deemed to have adverse impacts on the environment have to be preceded by an environmental impact assessment as provided for by EMA. The following laws, regulations and policies are applicable to this activity:

5.2 Applicable National Laws and Policies

TABLE 1: APPLICABLE NATIONAL LAWS & POLICIES
The Constitution of Namibia <p>The Namibia Constitution is the supreme law of Namibia and came into being on the date of Namibia's independence being 21 March 1990. The constitution makes provision for amongst other things, that :</p> <ul style="list-style-type: none">+ all persons shall have the right to practice any profession, or to carry on any occupation, trade or business;+ all persons shall have the right to acquire, own and dispose of all forms of immovable and movable property individually or in association with others and to bequeath their property to their heirs or legatees;+ all persons shall ensure the maintenance of the ecosystems, essential ecological processes and biological diversity and utilization of natural resources on a sustainable basis for the benefit of all Namibians, both present and future;+ the economic order of Namibia shall be based on the principles of a mixed economy with the objective of securing economic growth, prosperity and a life of human dignity for all Namibians+ the Namibian economy shall be based, inter alia, on the following forms of ownership:<ul style="list-style-type: none">o publico privateo joint public-privateo co-operativeo co-ownership, ando small-scale family
Namibia Water Resource Management Act, Act No. 18 of 2013 <p>This Act provides for the management, protection, development, use and conservation of water resources; to provide for the regulation and monitoring of water services and to provide for incidental matters. The line ministry is the Ministry of Agriculture, Water and Land Reform.</p>
Atmospheric Pollution Prevention Act (Act No. 45 of 1965) <p>This Act was enacted in 1965 is still being applied in independent Namibia today and resorts under the Ministry of Health and Social Services. The Act attempts to guard against the pollution of the atmosphere. A number of sections of this Act relate to 'Air Pollution Control Certification', dust control, closure certificate, etc. At present, the Ministry does not grant any certificates as no procedures or guidelines exist. The best practice would be to notify the Ministry of the anticipated emissions.</p>
National Heritage Council Act (Act No. 27 of 2004) <p>The line ministry is Ministry of Youth, Sport and Culture. The National Heritage Council Act provides for the protection and conservation of places and objects of heritage significance and the registration of such places and objects. It also makes provision for archaeological 'impact assessments'. Part V: Permits, paragraphs 51 and 52). If applicable, the relevant permits must be obtained before disturbing a heritage site as set out in the Act.</p>

TABLE 1: APPLICABLE NATIONAL LAWS & POLICIES**Atomic Energy and radiation Protection Act (Act No. 5 of 2005)**

The Hazardous Substance Ordinance No. 14 of 1974 was repealed and amended by the Atomic Energy and Radiation Protection Act. The Act provides for the control of substances which may cause injury or ill-health or death of human beings by reason of their toxic, corrosive, irritant, strongly sensitising or flammable nature.

Whilst the environmental aspects are not really explicitly stated, the Act provides guidelines with respect to importing, handling and storage, etc. of hazardous substances. The line ministry is the Ministry of Police, Safety and Security (the Drag Law Enforcement Unit).

Regional Council Act (Act No. 23 of 1992)

The Act resorts under the Ministry of Urban and Rural Development and was enacted to promote the planning and coordination of policies at the regional. Under Article 28, the powers, duties, functions, rights and obligations of regional councils include overseeing the general implementation of regional development activities.

The Labour Reform Act (Act No. 11 of 2007)

Overseen by the Ministry of Labour, the Labour Act as amended aims to “promote and maintain the welfare of the people and ... to further a policy of labour relations conducive to economic growth, stability and productivity”. It details basic conditions of employment, and health, safety and welfare requirements of employers.

The Local Authority Act (Act 23 of 1992)

The act provides for the determination of local authorities, for purposes of local government, of local authority councils; the establishment of such local authority councils; and to define the powers, duties and functions of local authority councils; and to provide for incidental matters

Public and Environmental Health Act (Act No. 1 of 2015)

The act provides for a framework for a structured uniform public and environmental health system in Namibia; and for incidental matters.

- ✚ Control and prevention of non-communicable diseases or conditions
- ✚ Water and food supplies
- ✚ Integrated waste management
- ✚ Public and environmental health planning and reporting
- ✚ Notification, prevention and control of diseases

Forest Act (Act No 12 of 2001) Gazetted 21 December 2001 No. 2667

To provide for the establishment of a Forestry Council and the appointment of certain officials; to consolidate the laws relating to the management and use of forests and forest produce; to provide for the **Protection of the Environment and the Control and Management of Forestry Fires**; to repeal the Preservation of Bees and Honey Proclamation, 1923 (Proclamation No. 1 of 1923), Preservation of Trees and Forests Ordinance, 1952 (Ordinance No. 37 of 1952) and the Forest Act, 1968 (Act No. 72 of 1968); and to deal with incidental matters.

Part V1 – Control and Management of Fires and provides for:

- ✚ Fire Management Areas
- ✚ Fire Management Plan
- ✚ Fire Hazard Areas
- ✚ Prohibition of Fires
- ✚ Liability for Fire Damage

Local Authorities Fire Brigade Services Act (Act No. 5 of 2006) Gazette No. 3760 December 2006

To provide for the establishment, maintenance, utilisation, co-ordination and standardisation of fire brigade services by local authorities; and for matters connected therewith. In this regard a local authority is authorised to:

- ✚ establish and maintain a fire brigade service on a fulltime or part-time basis;
- ✚ appoint a chief fire officer to run the service
- ✚ recruit additional members for the service on a fulltime and or par time basis.

TABLE 1: APPLICABLE NATIONAL LAWS & POLICIES**The Fifth National Development Plan (NDP 5)**

The 5th NDP is the blueprint which maps out the development plan of Namibia over the period 2017 to 2022 and ultimately to the realisation of Vision 2030. It outlines a development strategy to improve the living conditions of every Namibia. It consists of both the policy document and implementation plan.

The Harambee Prosperity Plan

The HARAMBEE PROSPERITY PLAN [HPP] is a targeted Action Plan to accelerate development in clearly defined priority areas, which lay the basis for attaining prosperity in Namibia. The Plan does not replace, but complements the long-term goal of the National Development Plans [NDPs] and Vision 2030. HPP introduces an element of flexibility in the Namibian planning system by fast tracking development in areas where progress is insufficient. It also incorporates new development opportunities and aims to address challenges that have emerged after the formulation of NDPs. The Harambee Prosperity Plan consists of five 5 pillars:

- ✚ Effective Governance
- ✚ Economic Advancement
- ✚ Social Progression
- ✚ Infrastructure Development
- ✚ International Relations and Cooperation.

5.3 Industry Specific Laws

The following laws and regulations are specific to the tourism industry in Namibia.

TABLE 2: INDUSTRY SPECIFIC LAWS**Environmental Management Act (Act 7 of 2007)**

The Act defines the environment and strives to promote sustainable management of the environment and the use of natural resources. It provides for a process of assessment and control of activities with possible significant negative impacts on the environment.

The Act also makes provision for the appointment of an Environmental Commissioner and a Deputy Environmental Commissioner – both statutory appointments made by the Minister of MEFT in terms of the said EMA to oversee the implementation and administration of the Environmental Management Act.

Environmental Management Regulations – Gazetted in Govt Gazette No. 28-30 of 2012

The regulations list those activities which may not be undertaken without an ECC and provides for the EIA regulations including enforcement of compliance.

Regulation 6 is specific to this activity: Tourism Development Activities – the construction resorts, lodges, hotels or other tourism and hospitality facilities.

Namibia Tourism Board Act (Act 21 of 2000, Gazetted)

The Act provides for the registration and grading of accommodation facilities and establishments as well as for the declaration of any sector of the tourism industry as a regulated sector and for the registration of businesses falling within a regulated sector.

It also provides for the regulations and minimum requirements pertaining to registration of regulated businesses, levies payable by regulated businesses as well as registration of accommodation establishments,

TABLE 2: INDUSTRY SPECIFIC LAWS

Accommodation Establishments and Tourism Ordinance 20 of 1973

This ordinance seeks to consolidate and amend the laws relating to accommodation establishments and tourism and to provide for the establishment of tourist recreation areas and incidental matters. It also provides for the regulations of tourism establishments and numerous amendments.

Namibia Wild Life Resorts Company Act (Act No. 3 of 1998)

The Act makes provision for the establishment of a Government company to be known as Namibia Wildlife Resorts Limited (NWR), to provide for its powers, duties and functions, to provide for the transfer of the wildlife resorts enterprise of the State to the Company and the transfer of staff members to the Company and to provide for incidental matters.

The Act also gives NWR exclusive right to manage wildlife resorts in the Etosha National Park and other game parks and nature reserves and any other resorts acquired and managed by the Company under this Act, including any accommodation establishment defined in section 1 of the Accommodation Establishments and Tourism Ordinance, 1973 (Ordinance 20 of 1973).

5.4 Windhoek Local Authority By-laws, Regulations and Policies

Some of the by-laws of the City of Windhoek that are applicable to this activity are as listed and briefly described in Table.

TABLE 3: LOCAL AUTHORITY BY-LAWS, REGULATIONS & POLICIES

Solid Waste Management Policy

The policy provides for amongst others:

- ✚ Garden, bulky and household hazardous waste
- ✚ Industrial, business waste and recyclable waste
- ✚ Hazardous waste
- ✚ Health care risk waste
- ✚ Council sites and waste disposal sites
- ✚ Accumulating waste, littering, dumping, abandoned articles and certain prohibited advertising
- ✚ Licensing for waste contractors/removers
- ✚ Enforcement and compliances

Town Planning Scheme

The scheme provides for:

- ✚ Management of all properties and related public sector functions across the City of Windhoek.
- ✚ Building restrictions: building lines, height, side space, density, coverage, parking & loading
- ✚ Safety, health, amenity and convenience
- ✚ Consent use applications, land subdivisions and infrastructure
- ✚ List of building with heritage status

Sewerage and Drainage Regulations

This policy caters amongst others, for the following:

- ✚ Supply of sewerage services by Council
- ✚ Control over discharge of sewage, stormwater and discharge from other sources
- ✚ Industrial effluent

TABLE 3: LOCAL AUTHORITY BY-LAWS, REGULATIONS & POLICIES

<ul style="list-style-type: none"> ✚ Requirements for drainage installation ✚ Installation of conservancy tanks or septic tanks and absorption fields ✚ Standards for effluents entering sewer systems. ✚ Standards and specifications for stormwater run-offs.
<p>Groundwater Regulations and Protections</p> <p>This policy provides for the following:</p> <ul style="list-style-type: none"> ✚ Protection of groundwater, landscape and vegetation sensitivity. ✚ Mandates that EIA and EMP be conducted for projects with the potential to impact underground water ✚ Identifications of three groundwater control zones: medium, high and very high.
<p>Noise Control Regulations</p> <p>The regulations provide for:</p> <ul style="list-style-type: none"> ✚ Prohibition of noise nuisance and to broadcast or cause to be broadcasted music, speech, messages or any other sound which causes or is likely to cause a noise nuisance, unless that person has obtained the Council’s written authorisation to do so. ✚ A person who wishes to broadcast music, speech, messages or any other sound on or from a street, public place, property or erf must apply for authorisation from Council.

5.5 Multilateral Agreements on Environments

Namibia as a country is a signatory to these international agreements on the environment:

TABLE 4: MULTILATERAL AGREEMENTS ON ENVIRONMENT

<p>The Stockholm Declaration on the Human Environment, Stockholm 1972</p> <p>Recognizes the need for a common outlook and common principles to inspire and guide the people of the world in the preservation and enhancement of the human environment.</p>
<p>Charter of the Regional Tourism of Southern Africa (RETOSA), 1997</p> <p>The objectives of RETOSA are:</p> <ul style="list-style-type: none"> ✚ The Development of tourism through effective marketing of the region in collaboration with the public and private sector. ✚ To facilitate, encourage and assist in the development of legal and ethical tourism throughout Southern African Regions taking due regard of the overall development of the people, the Region and the Region’s natural and cultural resources.
<p>Protocol in the Development of Tourism in SADC, 1998</p> <p>The Protocol sets out SADC’s objectives to build upon the region’s potential as a tourist destination.</p>
<p>Statutes of the World Tourism Organization, 1970</p> <p>Promotion and development of tourism with a view to contributing to economic development, international understanding, peace, prosperity and universal respect for, and observance of, human rights and fundamental freedom for all without distinction as to race, sex, language or religion.</p>

TABLE 4: MULTILATERAL AGREEMENTS ON ENVIRONMENT

Convention on the Biological Diversity, Rio de Janeiro, 1992

The convention provides for amongst other things that EIAs must be conducted for projects that may negatively affect biological diversity.

United Nations Convention on Climatic Change

The Convention recognizes that developing countries should be accorded appropriate assistance to enable such countries to fulfill the terms of the Convention.

6. THE ENVIRONMENTAL MANAGEMENT PLAN

6.1 Introduction

This Environmental Management Plan (EMP) is prepared to allow Open Range Marketing CC to apply for an ECC from MEFT for the operation of its recreational facility which comprises of a camping site, restaurant, swimming pool and bar. The recreational facility is situated on portion A of Erf 4831, Eros Park, Windhoek.

In addition, the ECC will allow ORM to apply and renew its Fitness Certificate from City of Windhoek hence ensuring that its operational activities are harmonised with the national laws, policies and regulations. The EMP is prepared to serve as a standalone plan to manage the potential impacts associated with the operational phase of the recreational facility.

6.2 Purpose

The EMP is to ensure that the **Environmental Impacts** associated with the operational phase of the recreational facility are managed, mitigated and kept to a minimum. This also includes ensuring that the mitigation measures are implemented and complied with and adhered to.

The EMP is a dynamic document which is flexible and responsive to new and changing circumstances, hence, it should be updated as and when required. Any substantive changes to the EMP will require authorization and endorsement of MEFT.

The EMP is binding on ORM, as the proponent, to its employees, guests as well as to any contractor who may be invited to carry out any maintenance and renovations in future. It must be included as part of any outsourcing, tendering for renovations and or any contractual documents between ORM and any third parties.

6.3 Acceptance

The acceptance of this EMP by MEFT will confer a legal obligation on the promoter, ORM to comply with the specifications and provisions of the EMP. Should the applicant fail to comply with the provisions of the EMP, it is deemed to be a contravention in terms of the Environmental Management Act (Act No. 7 of 2007), and as such, is criminally prosecutable. This EMP includes all relevant documentation contained therein or referred to within it, along with any amendments, appendices or annexure to this document.

Any substantial changes, updates, modifications or revisions to the EMP must be submitted to and approved by MEFT.

6.4 Environmental Management Objectives

The implementation of the EMP is a recurring process, that converts mitigation measures into actions and through monitoring, review and corrective action, ensures conformance with the overall aims and objectives of the recreational facility. These objectives are to:

- ✚ ensure compliance with the conditions of the ECC once granted by MEFT;
- ✚ propose effective and practical measures to prevent, limit, minimize, mitigate and/or to rehabilitate any impacts made to the receiving environment;
- ✚ protect human health and ensure safety of the employees, the visiting guests and the general public including complying with the guidelines recommended for combatting and containing the spread of the prevailing deadly COVID-19 pandemic;
- ✚ propose a plan to monitor and manage the recreational facility in such a way that the business carried out by ORM is technically sound, socially acceptable and environmentally sustainable

6.5 Emergency Numbers

Emergency numbers for the following entities or stakeholders should be prominently displayed on a notice board in the office of ORM:

- ✚ City Police
- ✚ Ambulance
- ✚ Fire brigade
- ✚ Health Inspector (CoW)

6.6 Roles and Responsibilities

Throughout the lifespan of the recreational facility, a number of individuals and entities are expected to fulfill various roles and responsibilities to ensure the effective implementation of the EMP.

In the table below are the roles and responsibilities that various parties will play with respect to the implementation of this EMP:

TABLE 5: ROLES AND RESPONSIBILITIES

Party	Roles & Responsibilities
<p>Ministry of Environment & Tourism (MEFT)</p>	<p>The Environmental Management Act is implemented by MEFT and the Environmental Commissioner is a statutory office responsible for ensuring and enforcing compliance with the relevant Environmental Legislations. Amongst the roles and responsibilities of MEFT are:</p> <ul style="list-style-type: none"> ✚ Granting of ECC (Environmental Clearance Certificate) ✚ Ensuring overall compliance with the terms of the EMP. ✚ Reviewing this document and any revisions thereof. ✚ Undertaking site audits at their discretion. ✚ Reviewing of any reports related to Incidents and or Accidents. ✚ Enforcing legal mechanisms for contraventions of the EMP and ECC.
<p>The Proponent (ORM) / Management</p>	<ul style="list-style-type: none"> ✚ To ensure adherence to and compliance with the EMP in a timely manner. ✚ To manage the day-to-day operational activities of the establishment in compliance with all relevant national legislations, regulations and policies including the terms of the EMP. ✚ To ensure that the staff members and all employees have been given an induction training on the provisions of the EMP and all its provisions. ✚ To ensure that the necessary environment authorizations and permits are obtained and kept on file at the site office. ✚ To maintain good open communications with stakeholders and authorities and to inform on any planned activities where relevant. ✚ To report any significant environmental incidents, accidents and or emergencies to the relevant local authority. ✚ To undertake regular inspections of the facility and to ensure on-site implementations and to check the effectiveness of the prescribed mitigation measures. ✚ To ensure that all staff members and suppliers are made aware of potential environmental issues and of all mitigating and precautionary measures contained in the EMP. ✚ To accept liability for any and all works required in terms of the environmental specifications, resulting from environmental negligence, mismanagement and or no-compliance.

6.7 Non-compliance of the EMP

Failure by ORM to comply with provisions of the EMP is likely to result in one of the following actions and consequences.

- ✚ Notifications may be issued in monitoring reports advising of failure to adhere to the measures stipulated in the EMP.
- ✚ Failure to comply/respond to notifications and recommendations within a specified timeframe will result in a written warning being issued.
- ✚ Failure to comply/respond to warnings within the specified timeframe could result in fines being issued.
- ✚ Continued and willful failure /respond will result in the issuing of a Compliance Order which is essentially the suspension of site activities until compliance is reached to the satisfaction of MEFT.
- ✚ In the event of severe negligence or failure to comply, all site activities may be terminated and criminal proceedings instituted against the promoter by MEFT.

7. ENVIRONMENTAL MANAGEMENT PLAN

The environmental risks and impacts associated with the day-to-day running of the recreational facility have been identified and addressed in this section. It is the proponent's responsibility to ensure that this plan is adhered to at all times during the operational phase. It is also the responsibility of the proponent to ensure the effective implementation of all mitigation measures contained in this EMP in order to prevent, to reduce and minimise the environmental impacts associated with the operations.

7.1 Biodiversity Management

7.1.1 Environmental Objectives

Maintain the integrity of the natural environment with respect to the faunal and floral diversities as far as practically feasible.

7.1.2 General Mitigation

Access Road

- ✚ Maintain the single access road and all internal routes in good condition to prevent dust and erosion.
- ✚ Regulate and control movements over the camp site such that personnel and vehicles move along designated paved routes and walkways.
- ✚ Runoff from internal routes and walkways must be managed to avoid erosion and pollution problems.

Floral Diversity

- ✚ Guests and staff should be provided with information explaining the different types of vegetation and sensitive species on site and why disturbance should be avoided.
- ✚ A sign with the wording 'no person is allowed to pick, remove, disturb, damage or destroy any plant' should be added to the existing signage.
- ✚ Site maintenance staff may not trample the natural vegetation and work should be restricted to dedicated roads, walkways and gardens within the camping site footprint.
- ✚ No large tree (with a diameter exceeding 250 mm) may be felled without the permission of Parks Department of CoW.

Faunal Diversity

- ✚ Ensure that staff and guests are briefed on the potential occurrence of the common faunal species occurring on and around the camping site, especially given its close proximity to the Klein Windhoek River.
- ✚ If encountered, such species may not be hurt or destroyed. This applies to snakes, lizards, spiders and chameleons as these are perceived to be vermin and pest.
- ✚ Develop a procedure for dealing with animals encountered on the site including dangerous animals and vermin. Where necessary professionals should be called in to remove such animals (snakes, etc).
- ✚ Dogs may be allowed on the premises provided they are kept on leashes.
- ✚ Any birds nestling on the huge trees on the premises should not be disturbed
- ✚ Ideally, yellow light bulbs should be used as they attract fewer insects and arachnids. Outside lighting should not make use of fluorescent lights because they emit significant amount of UV which will attract invertebrates and possibly birds.
- ✚ Feeding of animals is prohibited on the premises.
- ✚ Food waste should be appropriately covered to reduce the risk of attracting rodents, rats and bird species.

7.2 Resources Management

7.2.1 Environmental Objective

Protect amenity values and use resources wisely and sparing because they are limited.

7.2.2 General Mitigation

Water:

- ✚ Monitor water consumption from time to time to ensure that there is no undue waste. If a consumption limit is granted ensure that consumption does not exceed such limits.
- ✚ Install leak detection system, and promptly attend to any leaks when detected.
- ✚ Consider water recycling with the recycled water used for watering of plants and the lawn.
- ✚ Ensure that all site staff is trained in water wise principles, and that they practice prudent water use at all times.

Electricity:

- ✚ 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.
- ✚ Lights should be switched off when not being used.
- ✚ Consider the use of gas powered stoves in the kitchen instead of electrical powered ones.
- ✚ Consider the use of alternative such as solar energy for water heating appliances such as solar geysers. A small photovoltaic system would reduce the energy bill considerably given the amount of sunlight hours that Windhoek receives each year.

Waste: Solid, Liquid and Hazardous:

See section 7.8 on Waste Management Plan

7.3. Noise Pollution

7.3.1 Environmental Objective

Protect amenity values by ensuring that noise levels during those times when there are private functions or large groups of guests are kept within allowed parameters so as not to disturb ambience in the neighbourhood.

7.3.2 General Mitigation

Hooting:

- ✚ Guests arriving at night should not hoot to alert the security guard on duty. Hooting in the middle of the night will disturb other guests, staff on the premises and the neighbouring residents.

Revvng:

- ✚ Excess revving of cars and motorbikes for those guests departing in the wee hours of the morning should be discouraged as it disturbs other guests and the neighbouring residents.

Music:

- ✚ Music should be played at low volume and no sound amplification equipment may be used on the premises.

Complaints:

- ✚ Any complaints related to noise disturbances received from stakeholders/community should be recorded, immediately investigated and corrective action taken.

7.4 Dust Pollution**7.4.1 Environmental Objective**

Protect amenity values by ensuring that dust levels are kept within statutory parameters at the site.

7.4.2 Mitigation Measures**Internal Routes:**

- ✚ Internal routes (roads, parking bays, walkways, etc.) should be paved or covered/spread with crushed stones to reduce dust emissions.

Gaseous Emissions:

- ✚ Long idling of vehicles on the premises should be avoided so as to minimize NO₂ emissions and associated impacts.

7.5.1 Visual Intrusion**7.5.1 Environmental Objectives**

Ensure that the infrastructures do not alter the existing views of surrounding areas but are made to blend in well enhancing the sense of the site.

7.5.2 Mitigation Measures**Natural Vegetation:**

- ✚ Retain and maintain the natural vegetation inside and outside the premises of the recreational facility. All personnel and vehicle movements should be restricted to paved internal routes and walkways.

Appearance:

- ✚ Continue to maintain the general appearance of the facility as a whole since good appearance will enhance a positive visual impact.

Light Pollution:

- ✚ Any security light used at night should illuminate targeted objects within the premises boundary and may not offend the neighbouring residents.

Waste:

- ✚ Wind-blown papers and plastics outside the premises on the Klein Windhoek River side should be regularly picked up to avoid visual nuisance. Maintain a high standard of housekeeping.

Complaints:

- ✚ Any complaint received from any stakeholders regarding visual impacts should be recorded, investigated and corrective action taken.

7.6 Archaeological, Heritage and Cultural Aspects

7.6.1 Environmental Objective

Promote any sites of archaeological or cultural heritage interests around the capital city to foreign visiting guests.

7.6.2 Mitigation Measures

There are buildings around the premises and within the walking distance of the site which have been given the status of Heritage Buildings – it would be good to include such buildings in the information guide for guests.

7.7 Stormwater Management Plan

7.7.1 Environmental Objectives

The purpose of the Storm Water Management Plan is to provide general guidelines and principles for the management of storm water during the operational phase of the recreational facility. This is more critical given the close proximity of the recreational site to the Klein Windhoek River. The aim is to ensure minimal erosion and ecological damage as a result of increased volumes of storm water and runoff from hard surfaces which includes roofs, paved roads and walkways, etc.

7.7.2 General Mitigation

Maintain the storm water management system for the facility on an ongoing basis and to ensure that this is always in good working order. The following is of relevance:

- ✚ All activities that affect surface drainage should be designed so as to ensure that stormwater runoff does not lead to excessive surface erosion problems on the site.
- ✚ Porous paving surfaces (such as gravels) should be used in place of hard paved surfaces in order to promote and encourage the infiltration of storm water.
- ✚ Ensure that measures are in place to control the flow of excess water so that it does not impact on the surface vegetation.
- ✚ The accumulation of water on the surface should be prevented. The drainage of the surface should be done in such a way that storm water will be led away quickly and efficiently without any erosion taking place.
- ✚ Measures must be put in place around sensitive areas to protect these from sediment and contaminants.
- ✚ Do not allow surface water or storm water to canalise or be concentrated. Runoff from roads must be managed to avoid erosion and prolusion problems.
- ✚ Place and maintain erosion control barriers as appropriate to prevent sedimentation.
- ✚ Prevent stormwater or contaminated water directly entering any watercourse.
- ✚ Where possible install waste traps in the storm water system to trap litter and other wastes from entering the Klein Windhoek River waterstream. Waste traps should be regularly cleaned and inspected to ensure their efficient functioning.
- ✚ Dissipate concentrated stormwater flows through energy dissipaters or vegetated areas
- ✚ Monitor all rehabilitated areas for a year following the completion of any rehabilitation works for failure of vegetation to establish and / or erosion. Immediately implement remedial measures as required.

7.8 **Waste Management Plan**

7.8.1 Environmental Objective

A Waste Management Plan (WMP) outlining the measures and procedures for the appropriate handling, storage and disposal of wastes generated during the operational phase of the site should be developed and implemented. The WPM should strive to have as its priority to keep the various waste types separate at the site. In addition, the WPM should stipulate procedures to be followed and facilities where wastes are to be disposed of.

7.8.2 General Mitigation

General Waste:

- ✚ Recyclable waste such as cans, bottles, packaging and plastics should be stored in separate waste bins at the site and offered to recycling companies. Recycle bins should

be placed in strategic and convenient locations throughout the camping site and in sizes suitable for the location.

- ✚ Waste storage receptors should have lids and preferably labeled or colour coded. The lids will prevent that waste is not windblown around the camp site becoming visual nuisance.
- ✚ Organic waste from the kitchen (vegetable peels and waste food) should be stored in separate containers which are placed at the collection place for collection by CoW on the date as stipulated. Uncollected organic waste will start to decay /rot on the premises attracting rats and flies and giving off odour which is unpleasant to the guests, employees and neighbouring residents.
- ✚ Maintain a high standard of housekeeping by keeping the premises clean and tidy at all times. All waste should be cleaned up and disposed of at regular intervals. Burning of waste on the premises is prohibited.
- ✚ Staff should be made aware of the aim and benefits to recycle waste by means of posters, training and staff meeting. Guests should also be made aware of the camp site's recycling programmes by means of recycling instructions in rooms and in strategic locations.
- ✚ Management should undertake regular clean-ups and litter removal across the entire site and the surroundings including the open area between the camp site and the Klein Windhoek River.
- ✚ Any general waste from renovations and maintenance that cannot be reused or recycled should be stored temporarily in a designated area and transported to the closest permitted landfill.

Hazardous Waste:

- ✚ The disposal of hazardous waste must comply with the relevant bylaws, norms and standards pertaining to waste classification in order to ensure disposal at the correct landfill site.
- ✚ Wherever possible generation of hazardous waste should be avoided through procurement of less toxic environmentally friendly products.
- ✚ Any hazardous products procured for renovations and general maintenance of the facility (paint, thinners, chemicals, fuel, etc.) must be stored in enclosed, bunded areas that are clearly marked. Such waste should be disposed of, off-site at a licensed hazardous waste disposal site.
- ✚ Hazardous waste may be temporarily stored on site in suitable containers to prevent contamination of soil, groundwater and surface water due to accidental spills and releases.

- ✚ Hazardous waste must be separated at source from general waste stream. Common potential hazardous waste include used oil, oil contaminated waste, used cooking oil, fats and greases from extraction fans/filters, paint waste, fluorescent bulb waste, battery waste and electronic waste.
- ✚ Effective grease traps should be installed at all kitchens or cooking facilities and these should be regularly serviced and checked for functionality.
- ✚ All hazardous waste that cannot be reused or recycled should be stored correctly in a designated waste storage area until collected for disposal.
- ✚ Load and unload any solid hazardous materials in a manner that reduces potential spills.
- ✚ No spills may be hosed down into a stormwater drain or sewer, or into the surrounding natural environment.
- ✚ Immediately clean leaks and spills of hazardous substances and dispose of as hazardous waste. Any contaminated soil/substrate must be removed and stored in a skip or suitable container until it can be disposed of at a permitted disposal site.

Sewerage and Effluent:

- ✚ Ensure that the facility sewage system is maintained in a sanitary and operational state.
- ✚ Ensure that the facility sewage system is not overloaded, and that it functions within its design limits.
- ✚ Repair to sewage system should be done immediately.
- ✚ Ensure that measures are put in place to prevent sewage leaks and spills.
- ✚ Ensure that any repair to sewage system is carried out by qualified people.

7.9 Fire Protection Management Plan:

7.9.1 Environmental Objective

The facility must develop a Fire Protection Management Plan outlining the measures and procedures to be followed in the event of a fire outbreak as well as the measures to be taken to prevent incidents of fire arising.

7.9.2 Mitigation Measures

Fire Safety Plan:

- ✚ Management should develop a Fire Safety Plan highlighting the emergency procedures to be used in case of a fire, including sounding of the fire alarm, notifying the fire department and evacuating the premises.
- ✚ The staff and all employees should be aware of the plan and properly trained on the procedures in place.

Designated Fire Areas:

- ✚ Fire must only be made in a designated picnic or braai areas or in areas specifically designated by Management for that purpose.
- ✚ In the event where a 'social fire' is made, e.g. in a lapa, the fire may only be made where the ground is cleared of all combustible material for a radius of at least 4 m from the fire place. During windy conditions, the fire must be kept small or extinguished.
- ✚ Any fire made must at all times be under the control of an adult person.

Fire Extinguishers:

- ✚ Adequate fire extinguishers must be provided in terms of the relevant registration and such equipment should be regularly serviced, well maintained and kept in a functional state at all times.
- ✚ Employees should be trained on the correct use of fire extinguishers in the case of a fire outbreak as well as on the correct fire fighting methods and techniques.

Fire Alarms:

- ✚ Fire alarms must be installed at strategic locations throughout the facility.
- ✚ It is important to ensure that the fire alarms are kept in a functioning state – this can be ensured by checking the devices from time to time.

Signage:

- ✚ Provide adequate fire hazard signs such as 'No Smoking' and 'Exit Direction' signs. Such signs should be clearly displayed.
- ✚ Signs indicating escape routes and fire assemble points should be clearly displayed.

Complaints:

- ✚ Any complaint(s) received from guests or any stakeholder with respect to fire hazard should be recorded, promptly investigated and corrective action taken.

7.10 The Socio-economic Environment

7.10.1 Employment Creation

Hiring of Employees:

- ✚ Adopt a 'local first policy' when hiring employees for the recreational facility.
- ✚ Employees should be hired on merits without prejudice on gender, race, language, background, religion or political affiliations.

- ✚ People from marginalized communities (OvaHimba and Sun) should be considered and offered employment.
- ✚ People with disabilities should also be considered for suitable employment opportunities.
- ✚ Ensure that any recruitment of employees at the facility is done in a fair and transparent manner and should be gender and disability inclusive.

Employees' wellbeing:

- ✚ Guard and sensitize employees against social ills such as drug abuse, excessive alcohol consumption and diseases (HIV /AIDS and other sexual transmitted diseases).
- ✚ Provide employees with PPEs who may be working in areas in which they are exposed to danger.

Training:

- ✚ All employees should be given an induction workshop on this EMP.
- ✚ Provide and offer on-the-job training opportunities for employees to improve their skills level which ultimately leads to high productivity and efficiencies.

7.10.2 Hiring of Employees

Good Relationships:

- ✚ Develop and maintain good working relationships with employees, the neighbouring community and service providers. Join local organizations/associations in the hospitality industry for networking.

Labour Laws:

- ✚ Respect and comply with the labour laws, labour legislations, labour policies and labour regulations.

Trade Unions:

- ✚ Allow the employees to exercise their rights to join and belong to a trade union of their choice.
- ✚ Allow each employee charged with misconduct, the right to be represented during a disciplinary hearing.

Respect Culture & Traditions:

- ✚ Respect and accommodate employees who may have different cultures, believes and traditions.
- ✚ Employees who cannot work on Sundays on religious or cultural grounds should be accorded that respect.

Employment Contract:

- ✚ The terms and conditions of each employee should be clearly spelled out in a written contract with a copy held on the file at the office and one copy given to the employee.
- ✚ The contract should amongst other things spell out:
 - job specifications
 - working hours, and
 - remuneration

Records:

- ✚ Proper records should be kept with respect to the number of people employed whether fulltime or part-time, salaries & wages paid, etc.

7.10.3 Social and Community Impacts

Objective:

- ✚ Provide opportunities for local business, promote industrial relations, and contribute to socio-economic stability.

Tourism:

- ✚ Encourage and promote tourism by offering discounts to Namibian nationals on accommodation.

Goods & Services:

- ✚ Support local business by sourcing goods & services for the facility from local businesses.

Namibia Tourism Board:

- ✚ It is mandatory to submit reports to NTB on the number of tourists who visited the facility as well as whether they were locals or foreign guests.
- ✚ Such reports are compiled annually to indicate the number of tourists who visited Namibia. Reports should be produced by the facility as part of its management reports to NTB.

Complaints:

All complaints from the community with regard to the facility should be recorded, investigated and corrective action taken.

7.10.4 Health and Safety Aspects

Objective:

- ✚ Protect amenity values and business efficiency by ensuring that a high standard of health and safety is maintained in all operational activities of the recreational facility promoted by ORM.

Health & Safety Plan:

- ✚ 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 workers and guests should be protected and safeguarded at all times.

Emergency Response:

- ✚ Develop an Emergency Response Plan for the camping facility operation to deal with any safety incidents or accidents occurring.
- ✚ Contact numbers for the following service providers should be clearly displayed on a notice board at the premises:
 - City Police
 - The Ambulance
 - Fire Brigade

Personal Protective Equipment (PPE):

- ✚ Provide and supply suitable PPE to all employees working in the maintenance and cleaning sections of the facility.

Good Housekeeping Practice:

- ✚ Maintain good housekeeping.
- ✚ Comply with the guidelines in the EMP.
- ✚ Ensure adherence to the relevant health and safety legislation.

7.10.5 Covid-19 Guidelines and Regulations

This EIA was conducted during the time when Namibia was battling to contain the spread of the deadly SARS CoV-2, the virus that causes Coronavirus Disease 2019 (Covid-19). The number of infections is rising each day and it is uncertain when GRN will procure vaccine to vaccinate its citizens.

COVID-19 is deadly and each establishment is expected to comply with all guidelines and control measures as recommended by Central Government through the Ministry of Health and Social Services.



FIGURE 9: Covid-19 Safety Signs & Symbols

7.10.6 Covid-19 Mitigation Measures

To prevent infection and to slow transmission of COVID-19, the following guidelines should be implemented by each one: employees, employers and the general public who may be visiting the facility:

- ✚ Wash hands regularly with soap and water or clean them with alcohol-based hand rub.
- ✚ Maintain a distance of at least 2 meters between you and people coughing or sneezing
- ✚ Avoid touching your mouth, nose and face.
- ✚ Wear a mask when visiting shops or places where more people are congregated.
- ✚ Cover your mouth and nose when coughing.
- ✚ Avoid hand shake.
- ✚ Stay at home when feeling unwell.
- ✚ Refrain from smoking, drinking of alcohol and all other activities that weaken the lungs.
- ✚ Practice social distance by avoiding unnecessary travel and staying away from large groups of people such as sport, churches, weddings and funerals.
- ✚ If you have a fever, cough and difficulty breathing, seek medical attention by visiting a public health facility closest to you.
- ✚ Comply with the guidelines and regulations for the lockdown measures including all instructions given by the law enforcement agents.

8.0 CONCLUSIONS AND RECOMMENDATION

The recreational facility is established on land measuring about 10 070 m² with the actual footprint of the activity taking up approximately 60% of the said land. The promoter has considered a great deal of environmental sustainability including the use of materials that are fully removable hence low impacts.

The site has been developed in such a way that, to a certain extent, all structures blend into the environment and have no long lasting footprints. Internal routes and walkways have been neatly paved while parking areas are covered with gravels to reduce dust pollution and soil erosion.

Overall the economic benefits of the recreational facility in terms of employment creation and contribution to the tourism sector by far outweigh the limited negative impacts on the natural environment.

It is recommended that an ECC be granted to Open Range Marketing CC for the purpose of continuing to operate its existing recreational facility as described fully in this report.

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