

Onjala Lodge Environmental Sustainability & Social Responsibility Management Plan (ESSRMP)

ENVIRONMENTAL SUSTAINABILITY & SOCIAL RESPONSIBILITY MANAGEMENT PLAN

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1.1 Purpose of ESSRMP

The Environmental Sustainability and Social Responsibility Management Plan (ESSRMP) has been prepared on behalf of the Proponent, Onjala Lodge, to protect the environmental and social values of the lodge, its private nature reserve and surrounds which could potentially be affected by the Onjala Lodge operation.

The proposed ESSRMP is separate and complements the Onjala Lodge Environmental and Social Policy.

1.2 Distinctions

Onjala Lodge is proud to have been accredited as a Social Welfare and Conservation Support Lodge the past consecutive years from 2015 - 2017 by BirdsConTour. With the BirdsConTour Support Award program awards get distributed worldwide with the aim of allowing industry, local people and travellers to distinguish and chose those tour operators, attractions, cruises, flights, accommodations or any other businesses that make a commitment to supporting social welfare and/or conservation. Unfortunately this award program got discontinued.

1.3 Objectives

The objectives of the ESSRMP are to provide:

• assurance to the community and to the government that the proponent will commit to minimise environmental and social impacts during the operation of the lodge;

• a base for detailed environmental management plans and operational contracts;

• practical and achievable commitments to ensure that the lodge will have minimal impacts on the environment and social values; and

• an integrated plan for monitoring, assessing and controlling potential impacts.

1.4 ESSRMP Structure

Element / Issue (1.5)

Aspect of operation to be managed (as it affects environmental and/or social values).

Operational Policy (1.6)

The operational policy or management objective that applies to the element.

Performance Criteria (1.7)

Measurable performance criteria (outcomes) for each element of the operation.

Implementation Strategy (1.8)

The strategies, tasks or action program (to nominated operational design standards) that would be implemented to achieve the performance criteria and also include the implementation agency for each element of the ESSRMP.

Monitoring, Auditing and Corrective Action (1.9)

The monitoring requirements to measure actual performance (i.e. specified limits to preselected indicators of change).

The auditing requirements to demonstrate implementation of agreed operation environmental and social management strategies and compliance with agreed performance criteria.

Reporting (1.10)

Format, timing and responsibility for reporting and auditing of monitoring results.

The action (options) to be implemented in case a performance requirement is not reached and the person(s) responsible for action (including staff authority and responsibility management structure).

1.5 ESSRMP Elements / Issues

The ESSRMP specifies management responses for the following issues and elements under operation of the lodge:

Environmental conservation:

Air

- Levels of dust-laden air and air pollution has been significantly reduced on our property by introduced traffic speed limits clearly indicated by speed limit signs.
- Reduce the need for driving, restricting to necessary trips only.
- Promote the use of travel alternatives such as e-mail or video/phone conferencing.

Water - Groundwater

- Through river engineering, by having constructed four ground sills, Onjala Lodge over time raises the underground water level.
- Onjala Lodge is not connected to mains water and water is drawn from onsite bore water and a natural source which is approved with a license issued by the Namibian analytic laboratory. All water sourced from internal boreholes is recycled back to nature via waste water gardens. No fossil water is tapped on.
- Guests are requested by documentation in the rooms to minimise water consumption and we have a boomerang system in place for the guests to request a linen and towel change.
- With an additional installed purification system Onjala Lodge removes biological contaminants from the natural water. The goal is to produce clean natural water 100% fit for human consumption, drinking and food preparation.
- Water meter readers are installed for regular measurements of usage and to detect leakages. Water Surface water

In the Onjala private nature reserve five man-made reservoirs, artificial lakes, across a river, replace the otherwise natural process of lake formation. They are fed only by rainwater runoff in a river. These lakes serve as drinking water for wildlife and as a habitat for wetland bird species. They also increase the protection of the downstream river from flooding events. Our lakes are ecologically rich and provide us social and economic values, ranging from scenic views and game watching to bird watching. These values depend upon a broad diversity or biodiversity of habitats and species (plants and animals) living within these lakes habitats, making them invaluable ecosystems. When the dams dry out in dry years this time is used to repair the dams.

Water - Wastewater

- All water is recycled back to nature via waste water gardens.
- Guests are asked not to put any inorganic material into the waste water garden.
- Guests are provided with biodegradable soaps and shampoos for the health of waste water for our garden.
- Wastewater irrigation takes place during relatively uncritical times of the day to reduce the risk of our guests and staff getting in unnecessary contact with airborne bacteria and viruses from irrigation with wastewater.

- Our gardeners water during cooler day times to slow down evaporation, allowing water to seep into the soil rather than evaporating into the air.

Water - Rain water

- Additional water is provided by three rainwater catchment/harvest tanks at the lodge with a capacity of 60 000, 10 000 and another 10 000 litres each, accumulating up to 80 000 litres altogether.
- We minimise water use with dual flush and low flow toilets, water saving shower heads and tap aerators and we use rain water for flushing toilets and showering.
- In the employees' quarters, a person has been recruited to in addition keep the sanitary facilities in order and thus prevent waste of water due to leaks.
- Source of energy
- Pools are not heated.
- Old windmills have been renovated to function as sustainable water pumps.
- The energy consumption and efficiency of new products is taken in account when purchasing.
- Low wattage fluorescent bulbs are used throughout the lodge and efforts are always made to reduce power consumption and research new ways to save energy: ie moving from standard energy efficient fluorescent globes to newer technology LED lights.
- Lights and electrical equipment is switched off when not in use.
- We manage our energy use effectively by using energy efficient light bulbs, for the path lights we use energy saving bulbs and the main lodge lights are turned off at night.
- Energy is conserved by using natural circulation and fans.
- Natural ventilation is used, with buildings sited to catch the sun as effectively as possible, with minimal air conditioning.
- All buildings use natural lighting during the day from windows.
- A Solar System has been put up
- Sun-line drying our laundry allows us to save money on electric bills, conserve energy and helps to protect the environment by saving precious fossil fuels, enhance freshness and helps remove strong odours, be more gentle to fibres, increase physical activity and promote weight loss, reduces the use of bleach and disinfect laundry, reduces indoor fire risks and it allows us to offer an outdoor experience that is meditative and helps to reduce stress.
- Dishes are washed by hand in the main kitchen in an attempt to lower stress, reduce risk of getting allergies, to contribute to the sense of wellbeing (relax), heighten immune system, conserve water, take care of delicate dishes and to teach people life skills.
- Ovens and cook tops are 99% gas powered.
- No TVs in guest rooms. On arrival we make our guests aware not to waste electricity.
- We minimise and track our power usage using power readers.

Fuel

- Reduce the need for driving, restricting to necessary trips only.
- Promote the use of travel alternatives such as e-mail or video/phone conferencing.
- Our vehicles are serviced regularly to maintain optimal fuel efficiency.
- Onjala Lodge management endeavour to purchase more fuel efficient vehicles and machinery. In addition manual lawn cutters and manual grass cutters are deployed because they are environmentally friendly, quiet and create workplace.

Solar

Most of the needed power is generated by a successful 65kW solar power system, constructed with the goal to be off the utility power grid. This grid solar station powers all of the lodge during day time and excess energy is fed into the system again. Only geysers are excluded. Half of the geysers used are solar heated.

Nature conservation:

Sustainable land management

- ProBird Nature Management principles activities can include erecting wild bird support stations (feeding stations), bird friendly infrastructure, vulture feeding stations, bird friendly gardens, bird monitoring, habitat restoration, land protection, and proposing sustainable land, water and air management principles.With holistic grazing planning practices we manage local game on the nature reserve to mimic what wild herds of animals have been doing in the past in southern Africa, functioning to keep grasslands healthy and productive. This behaviour positively impacts soil health and our ecosystem can be restored to a healthy state where lush grass veld thrive. Herewith we counteract overgrazing and/or other over-exploitation of natural resources, bush encroachment, soil erosion and degradation and combating desertification, etc. (active monitoring and management activities with the neighbouring communities).
- Artificial waterholes in many wildlife areas have caused more damage than good. In numerous examples landowners have established multiple waterholes on their properties. mainly for game-viewing purposes and ignorant of the many negative ecological effects these have caused. Certain animal overpopulation and widespread distribution in these areas can, to a certain extent, be attributed to excessive artificial water points. These high and permanent animal concentrations may be leading to local extinction of many important plant species whereby some animal species destroy the adult plants while others kill the seedlings. Therefore high and permanent animal concentrations are negatively impacting on lesser, but no less important, fauna and flora. Even birds from the tiniest warbler to the great eagle are being affected by changes in vegetation structure. Eagles and many other raptors, including most vulture species, require large trees for nesting purposes. Other birds such as Hornbills nest inside holes in bigger trees. As wildlife mismanagement destroys the big trees, so will we see birds such as these disappearing from the area. By knowing that humans have created these ecological problems we at Onjala see it as our responsibility to actively manage our waterholes in our nature reserve to preserve biodiversity for future generations in that we in rotation close down certain waterholes from time to time to relief the wildlife pressure on certain areas in order to give the flora in these areas the much needed rest to recover through regrowing.
- Bush clearing by manual and tyre-dozer tractor is in progress in the Onjala nature reserve with the aim of consequently restoring wildlife, the original African savannah, environmental productivity and socio-economic sustainability.
- The arrangement of designated routes and roads provide a wildlife friendly recreational opportunity of game drive viewing. Our roads are well designed and stable in order to control erosion and need less maintenance.

Biodiversity

We enhance species and habitat conservation and we remove invasive alien plants and animals (active monitoring and management activities with the neighbouring communities and/or conservancies). This is an ongoing process due to rivers being invested. We even remove these plants at our neighbouring farms. In the Onjala private nature reserve three man-made

reservoirs, artificial lakes, across a river, replace the otherwise natural process of lake formation. They are fed only by rainwater runoff in a river. These lakes serve as drinking water for wildlife and as a habitat for wetland bird species in order to enhance the biodiversity.

Animal conservation

Game management at Onjala lodge ensures that the total game stock does not exceed the economic carrying capacity of the veld. Onjala lodge relies on professional game-capturing teams and then sells the animals alive. Onjala's' game management has the task of maintaining the critical mass of a game at its economic carrying capacity through good and bad seasons. Sentimentality in our game management may be misplaced; hesitation about removing surplus animals will result in a deterioration of the veld and therefore a steep decline towards low population numbers and perhaps even the local extinction of certain species in our much valued Onjala Nature Reserve. This game management job is done in an ethical and selective way contributing to the conservation.

Bird friendly guidelines are an integral part of the Onjala lodge biodiversity strategy. In keeping with this plan, Onjala lodge recognises the role it has to play in creating the conditions for native birds to thrive in the Onjala nature reserve, knowing that birds provide valuable ecosystem services in the form of pest control, pollination, and seed dispersal and also form a dynamic link between people and nature that can inspire stewardship and enrich people's lives. In order to increase pest control, Barn owls, Spotted Eagle Owls and Rock Kestrels are attracted to our Onjala nature reserve by having installed nest boxes. Nesting pairs will focus hunting near the nests and will capture increased amounts of rodent prey for growing chicks. Especially Barn owls are known to kill and stockpile more prey than needed. Kestrels will hunt large insects, such as grasshoppers, crickets, beetles, and moths, as well as small mammals and birds. The presence of predators nearby make the pests more cautious and less likely to come into the area to feed.

- We also removed more than 40km of wire fencing which is no longer needed, as the Onjala nature reserve decided to take down their fences to allow wildlife to roam freely on greater ranges. This wire will no longer be an obstacle in the animals' internal journey, nor will it harm them anymore.
- The Onjala lodge directly conserves wild meerkat (suricate) populations and is completely against the exploitation of wildlife and keeping meerkats as pets, selling them or abusing them in anyway. No tame meerkats are kept at Onjala lodge and 50 meerkats were successfully rehabilitated into the wild during the past ten years
- A secure area is provided for wildlife where animals can retreat to when disturbed. Such area of security habitat is essential if motor vehicle access and game populations are maintained on a common landscape.
- Historical records prove that the near-endemic Rosy-faced Lovebird used to roam in these parts of Namibia where the Onjala lodge is situated, but not anymore. Most probably due to loss of suitable food sources and nesting sites. The closest stable populations of these parrots are located at 75 km west of Onjala lodge in Windhoek with surroundings and then east about 70 km away. These populations are about 145 km apart.
- The Onjala lodge, in collaboration with BirdsConTour, is trying to create a corridor by means of a relocation project and offering various species-appropriate nesting sites, which is offered to the wild birds, in order to establish a connection between these two populations and to lure this species back into its original habitat.

- For many of the vultures in Africa, their future is not looking so bright. In some countries, vultures are running out of wild space to forage for food, and when they do come back down to earth, they often face poaching and persecution by people. From all eleven species of vultures in Africa numbers have declined at an average of 62% over the past 30 years. Electrocution by power lines, loss of food supply, poisoning and use of their body parts for traditional medicines are among the reasons for the decline. To aid the survival of vultures, Onjala in cooperation with BirdsConTour plan to create a Vulture restaurant for tourists to view, learn about and photograph these remarkable birds from a hide. During a daily feeding experience staff will put out leftover meat scraps from the kitchen and surrounding area in a designated feeding zone. It is important to understand that this vulture restaurant does not create dependency, it is simply a supplementary feeding site to prevent vultures from starving to death. That is why the Onjala lodge vulture restaurant is so important as there is not enough food out there for vultures to rely on for natural feeding. We also reach beyond our borders, we are creating awareness.
- The African honeybee is not officially classified as threatened; however, they are experiencing threats, including diminishing forage resources, pests and diseases, as well as problems arising from the misuse of pesticides and insecticides in the environment. For us the African honeybee is an important pollinator of flowering plants in our Onjala nature reserve, including many of our thorn trees. That's why we believe to remove them professionally and re-establishing honeybee colonies that have nested themselves in areas where they cause conflict to staff or guests is an important step toward the future prosperity of honeybees and humans. Each honeybee colony that we can successfully relocate into a safe environment will continue its vital work of pollinating.
- Our guests are encouraged by signage and books to participate as citizen scientists in animal conservation:

Dear guests and staff,

become a Citizen Scientist (public participant in scientific research) through participatory monitoring and reporting birds that are considered to be under any level of threat. Please feel free to browse through this book in order to find out which Namibian species are Red Data listed birds.

This Red Data Book on the birds of Namibia is the first comprehensive Red Data Book for Namibia. Please report sightings of rare and threatened bird species or other interesting bird observations to our partner in birding matters under <u>birdscontour@iway.na</u>

• Waste, sewerage & pollution control:

- We properly design and manage waste disposal sites and treatment facilities so that they offer considerable ecological services that often go hand in hand with the obvious social, health and economic benefits.

Indeed, waste water and solid waste disposal and treatment sites can provide important and safe habitats, notably resting and feeding sites for migrating and resident birds. (See details in the various project/program descriptions of BirdsConTour.

- The Spa water treatment we use is an environmentally safe product. Guest in-room amenities and spa products are organic nature based.
- Onjala Lodge purchases environmental cleaning products that are compatible with our waste water treatment system.
- Waste is minimised, re-used and recycled wherever possible and we deliver the pre-sorted waste to the professional recycle company Rent-a-Drum.
- If possible items are purchased in bulk to minimise packaging.

- no bottled water is offered at the lodge. We offer unlimited borehole water to all guests and providing natural borehole water dispensers in all rooms. Sparkling water comes from the borehole water and is filled into glass bottles.
- Stainless steel refillable water bottles are sold to guests.
- All organic food waste gets delivered to a neighbouring pig farm.
- Educating the staff is a vital part of waste management.
- With the aim of throttling the accumulation of empties, we only sell draught beer to our guests

Infrastructure impact:

- Constructed using local natural stone and natural materials like thatch roofing, little color, in sympathy with the landscape and employing Namibian local builders, Onjala Lodge aims to bean excellent model of sustainable tourism that will enhance the environment and show local villagers and guests a new way of moving towards a sustainable future.
- Minimal trees were removed during construction of the lodge.
- Due to our lodge settlement construction, it is imperative that action needs to be taken to reduce the impact of the lodge operation on birds by having erected a Wild Bird Support Station together with BirdsConTour. Additionally artificial nests to the tastes of different birds are put up to attract even more garden birds. This contributed to Onjala Lodge receiving a Social Welfare and Conservation Support Award from BirdsConTour for four years in a row already.
- The place of the lodge parking lot was selected very carefully. Namely, a place where a thick layer of rocks is present in the subsoil so that unavoidable oil leaks of the guest vehicles can not penetrate into our valuable underground water unnecessarily.
- Environmental responsibility is a cornerstone of the Onjala lodge business philosophy. That means that we have sourced and used wood as sustainable, eco-friendly material when having constructed our carport shade.
- A recent refit of bathrooms has allowed for low flow showers, dual flush toilets and tap aerators to be fitted in order to minimise water use.
- By reflecting foliage or sky, the lodge windows look like inviting places to fly into. And because the sheer number of windows is so great, their toll on birds is huge. By having identified the dangerous windows we marked the outside of the windows to safeguard them for birds.
- Guest swimming area is harvested rain water pool.

Office

- Promote the use of paper alternatives such as e-mail or video/phone conferencing.
- We have a reduced paper consumption policy with key marketing activities being online (website and email marketing) and a pdf version of our brochure on the website. The printing of the Onjala Lodge brochure has been discontinued.
- Materials used in office refurbishment will be as environmentally friendly as possible. Housekeeping and kitchen.
- At Onjala lodge we pledge to find the best possible solutions to solve some of industry's most vexing environmental problems and to keep current with everyday products so we can take leadership in conserving natural resources. For example, World wide an estimated 8 billion hangers goes into landfills every year. That's enough to fill 4.6 Empire State Buildings from basement to observation deck—every year! And they don't lie there quietly either. Plastic hangers made out of polystyrene leach dangerous chemicals such as benzene into our drinking water. Polycarbonate hangers leach bisphenol-A into our ground water. Both can

take up to 1,000 years to break down. That's over 40 generations—all for a simple hanger. Therefore Onjala lodge took the initiative to make use of biodegradable wooden hangers.

- Onjala Lodge purchases environmental cleaning products where possible and ones that are compatible with our waste water treatment system.
- Cleaning materials used will be as environmentally friendly as possible.
- We use only biodegradable cleaning products and produced locally in Namibia.
- All laundry and kitchen detergent, guest shampoo and soap are biodegradable.
- Onjala Lodge use locally produced and environmentally friendly shampoo, body wash, laundry detergent, household detergent. Baking soda, vinegar, and sodium bicarbonate are used for stubborn fabric stains.
- No MSG, margarine or refined oils are used in cooking.
- Onjala Lodge endeavours to supply the restaurant from their biological garden.
- Alternatively we source other produce locally where possible to minimise packaging and emissions from transport.
- Locally produced eggs, milk and cheese are sourced locally.
- Only stainless steel pots are used for cooking.
- 75% of our restaurant menu is local cuisine produced by Namibian staff using 10% traditional cooking methods.
- Durable service and storage items are always used instead of plastic.
- Onjala Lodge strive for zero waste in the kitchen.

Garden

- Our lodge landscaping uses local species of plants grown from cuttings or seeds.
- A hardy and well adapted type of lawn is used to stabilise slopes in order to prevent erosion.
- Many native plants have been planted to encourage and support insects, birds and other wildlife.
- An organic permaculture garden provides the lodge restaurant with some fruits and vegetables.
- Indigenous trees (plants) have been incorporated.
- Water conserving practices are implemented at the Lodge through which grounds are partly kept low maintenance mulched gardens with partly no irrigation required.
- We use shade netting for our vegetable garden because our lodge is situated in an arid region where the use of shade nets result in water use efficiency, which is a crucial environmental issue in such regions. Shade nets modify the crop microclimate and thus reduces the atmospheric water demand and lead to water saving.
- Waste water gardens are maintained in order to save fresh water.
- Extensive stabilised access paths were constructed for guests to reach their chalets while preserving the landscape.

Guiding code of conduct:

At the core of envision is knowledge. The more we all know, the better we can change in a positive way. Every day, we educate and inspire guests in a variety of ways—from complimentary education materials to guided activities and individual discussions.

We believe that by sharing our vision with our guests, they will understand and participate in protecting the natural beauty of Onjala Lodge Nature Reserve. Along the way, they will also be better informed in avoiding hazards and accidents with wildlife during their stay. The result of knowing more allows guests to have an enjoyable experience, and helps us to preserve Onjala Lodge Nature Reserve for future visits and guests.

Necessary activities at the Lodge are guided and carried out in an extremely respectful nature to the private Onjala Lodge Nature Reserve area in which the lodge operates – with nature walks marked to narrow trails and all nature drives carried out in accordance with the Onjala Lodge Nature Reserve zoning regulations. Guides are local and deeply protective of the environment and encourage guests to be sensitive to their surroundings at all times. Additional environmental information can be found in the documentation in the rooms and in the library at the Lodge with reference books, journals and information about our multiple animal and nature conservation projects which guests can chose to support. We want our guests to leave Onjala lodge with a greater understanding and appreciation of the natural environment and how to protect it.

Sustainable guest relation:

We encourage our guests to maintain environmental practices in their everyday life, even when they are away from home, and to use local energy and water efficiently. While traveling through Namibia, we encourage our guests to support tourism operators who have achieved the ECO Award, BirdsConTour Award or similar that allows travellers to Namibia to identify and support operators who meet the benchmark and so ensure that tourism products have minimal impact on the environment.

Guests are requested by documentation in the rooms to minimise water consumption and we have a boomerang system in place for the guest to request a linen and towel change.

Guests are asked not to put any inorganic material into healthy waste water used for garden.

Guests are encouraged to use the biodegradable soaps and shampoos provided for the health of waste water used for gardens.

In an increasingly frantic world plagued with social and environmental problems, Onjala's no motorised ecotourism activities take guests back to experiences that renew, replenish and revitalise: intimate encounters with wildlife, tranquil hiking moments in the bush, connections with our staff by taking part on an informative walk over the lodge ground and visiting our downtown (staff village), star gazing, mountain biking trails and bird watching.Offering a break from the everyday and memories to cherish, our eco-friendly activities aim to leave the lightest possible touch on Onjala's beautiful, fragile nature reserve. Our guest relation is committed offering activities with a low impact on the environment and local people, while helping to generate income and employment for local people, resulting in a net benefit for the social, economic, natural and cultural environments of the area in which activities take place.

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We believe that by sharing our vision with our guests, they will understand and participate in protecting the natural beauty of the Onjala reserve. Along the way, they will also be better informed in avoiding hazards and accidents with wildlife during their stay. The result of knowing more allows guests to have an enjoyable experience, and helps us to preserve Onjala Reserve for future visits and guests.

Social responsibility, community support and staffing:

- Giving back to the community is a large part of the purpose of Onjala Lodge: to counteract unemployment in Namibia and to help provide a future for the young people all staff is sourced locally and also trained locally in hospitality and eco practices.

- While tourism grew rapidly and prices increased drastically in Namibia in recent years and inhabitants of Windhoek love their outdoors, the Onjala Lodge create a special rate offer for

locals to satisfy their need for outdoor experience while enjoying nature and adventure activities and treading lightly on the earth.

- All profits from the lodge are re-invested locally in Namibia.
- Permanent staff are employed as well as other local workers hired for extraordinary jobs and maintenance activities.
- Wherever possible, local suppliers are used for additional food and construction materials and environmental awareness is promoted to them also.
- Onjala Lodge organise book, pencils and laptop donations from guests and friends?
- Staff hospital expenses are covered.
- Onjala Lodge has a good working relationship with their staff and hence are a popular employer.
- Onjala lodge offers special last minute rates to local people in aid of giving them the chance to enjoy an otherwise for them not affordable accommodation.
- Onjala Lodge's souvenir shop supports local entrepreneurs and sells Penduka products, ! Nara products and Desert Secrets products to name only a few.
- Local entrepreneurs are supported to run an informative guided walking service for guests on the lodge grounds.
- All lodge decorations are Namibian and where possible purchased direct from the artist. Cheap imitations are avoided and premium prices paid to support the artists.
- Linen and towels are purchased direct from a woman welfare organisation who embroider these items by hand.
- Teach German to staff of Onjala Lodge on a learning by doing principle.
- We offer long day care hours with the first privately operated child day care centre in the surrounding.
- Because soccer is great for health and socialising and can be played in competition with staff from neighbours, we constructed a soccer field on the lodge ground and sponsor our own Onjala soccer team. Also we organise outdoor soccer practice, games and competitions with teams in the surrounding. The soccer team spirit enables us to maintain good relationships with the neighbours and it enables us to have a positive impact on surrounding communities.
- We provide through our network facility the opportunity for interns (from Namibia and from Germany) to complete their internship at our lodge.
- We have through our networking process also assisted 4 students of the DHPS by providing the practical training they have needed.
- Tobias is now an integral part of the business as head servant.
- Our internal training on various aspects such as gastronomy and conservation matters offers our employees advantages that are not found when you send an employee to an external training program or seminar. Training transfer occurs more naturally and our employees cement learning through training other employees. Our on-the-job training enhance our employee's skills and ensures their readiness for the next promotion, which is far superior to a public seminar.

Health and safety:

Onjala Lodge Health and Safety Policy: This is our commitment... also considering the Onjala Lodge Nature Reserve, our role is to be stewards of this reserve and to provide a safe and healthy experience for our visitors and employees through a health and safety program designed to prevent incidents that may cause harm to our employees, visitors, or guests. We will:

- Comply with all requirements of local laws and regulations that help protect visitors and employees.
- Provide leadership and actively participate in educating Onjala visitors and employees with respect to health and safety issues.
- Continually work to perfect practices, procedures, and reporting to maintain consistently high standards to prevent injury and illness for employees and visitors.
- Ensure that supervisors are familiar with our health and safety programs and train employees accordingly; and, that we hold supervisors accountable for any incidents in their area of responsibility.
- Require employees to follow all safety policies and procedures for performing their duties in a safe and professional manner.
- Encourage employees who observe any unsafe conditions or actions to report them to their supervisor who will take immediate and appropriate measures necessary to eliminate such conditions.
- Encourage our guests and visitors to share any safety concerns with a manager on duty.
- Strive to ensure that any job or activity will not be undertaken until the safety of employees and visitors has been considered first and only encourage activities that promote a safe visit to the game reserve and our facilities.

We make this important commitment to you and to the success of our program. Onjala Lodge is poised to remain a leader in providing a healthy and safe experience for people, while protecting the environment for future generations. We see our role as a guardian of the reserve and the facility and of those who choose to work and visit here.

Safety for visitors, guests, and employees is a core value of the Onjala Lodge.

• Future:

- Onjala Lodge will continue to use renewable local building material to maintain and expand the lodge.
- We will keep on working on water and garbage management to preserve the unspoiled environment.
- We will continue to inform and make local people sensitive to waste management so that these skills become part of their daily lives and the next generation will be more responsible with garbage disposal.
- We will continue to develop our solar power supply system.
- We aim to be as self-sufficient as possible for food, energy, water and power.
- Onjala Lodge will continue to review, plan, update and implement their eco policy for best practices for the environment.
- Onjala Lodge management will mentor and encourage other tourism operators to operate more responsibly.

1.6 Responsibilities

All the Proponent's employees, contractors and associated personnel involved in the lodge are responsible for the environmental and social performance of their activities and for complying with the Environmental Sustainability and Social Responsibility Management Plan of the lodge, which means:

"A person must not carry out any activity that causes, or is likely to cause, environmental or social harm unless the person takes all reasonable and practicable measure to minimise the harm."

A number of parties will be involved in the operation of the lodge, with position titles and accountabilities. These roles are described below.

Onjala Lodge (the Proponent): The Proponent will:

- be responsible for the overall management of the operation of the lodge, including environmental and social value performance.
- communicate any delegations of responsibilities under the ESSRMP to sub- contractors, or others as relevant, via contractual agreements.
- employ a lodge manager for the operation of the lodge. The responsibilities of this role are outlined below.
- employ an environmental social management contractor for the operation of the environment and social projects and work with local consultants and neighbours to protect the land. The responsibilities of this role are outlined below.

Lodge Manager: The Lodge Manager will:

- ensure that the various work teams are adequately resourced to enable all personnel to carry out their duties in an environmentally and social responsible manner and comply with the operations ESSRMP.
- assign supervisors or facilities managers (eg manager of spa, kitchen or restaurant) to implement various components of the operations ESSRMP as his/her representative.
- Communicate with the proponent's environmental social manager on environmental and social project performance and incidents.

Environmental Social Manager: The Environmental Social Manager will:

- be responsible for ensuring the Proponent, its contractors and employees are aware of their responsibilities under the ESSRMP and any approval/permit conditions.
- report to the Proponent and Lodge Manager on environmental and social project performance and incidents.
- develop the Environmental Sustainability and Social Responsibility Management Plan (ESSRMP);
- prepare relevant plans, procedures and policies to assist the proponent to comply with its obligations;
- manage guides, rangers and other staff who will oversee the environmental conservation, nature conservation, animal conservation, waste, sewerage and pollution control, infrastructure impact, guiding code of conduct, sustainable guest relation, social responsibility, community support and staffing, health and safety and future programs for the project;
- work with the neighbours to implement the environmental and social consciousness;
- develop and run awareness training sessions and visitor inductions;

- conduct regular audits, oversee the monitoring programs, prepare internal and external compliance reports.
- in case of construction ensure that the various work teams are adequately resourced to enable all personnel to carry out their duties in an environmentally and social responsible manner and comply with the operations ESSRMP.
- be responsible for developing detailed construction plans if necessary, in compliance with the overarching ESSRMP, development approvals and contract conditions.

The Environmental and Social Manager will have appropriate environmental qualifications and experience and be supported by external professionals where necessary.

1.7 Competence, Training and Awareness

All lodge staff and contractors will complete a comprehensive induction relevant to each of the Environmental Sustainability and Social responsibility Management Plan. The induction will include a review of the ESSRMP's environment and social management procedures and requirements.

This training will be updated frequently and targeted to items of relevance for the specific phase of the ESSRMP. Daily pre-start meetings will be conducted by the contracting teams and regular team (tool box) meetings will be held to highlight and discuss environment and social management issues relevant to each area of work during the operation phase of the ESSRMP.

1.8 Incident Management

Management of near-misses and incidents is important to reduce the likelihood of an event occurring that could cause harm to the environmental or social values in the lodge and private nature reserve. All near-misses and incidents will be reported to the Environmental and Social Manager who will follow up with the relevant people to ensure adequate response is undertaken to avoid a recurrence.

A near miss is a potential incident that did not actually occur due to chance and an incident is any event that harms, or has the potential to harm environmental or social values in the lodge, private nature reserve or surrounds.

In the event that a near-miss or an incident occurs, the following steps will be followed immediately:

- prevention of further environmental / social value harm;
- clean-up and /or control of polluting substance(s);
- implementation of mitigation measures to prevent recurrence of similar incident / potential incident;
- documentation and investigation as appropriate; and
- reporting to the Environmental Social Manager.

Incidents likely to cause off-site impacts or significant environment harm will be reported by the appropriate manager to the Proponent or other appropriate authority in accordance with statutory requirements.

1.9 Incidents and Complaints Register

A record of all near misses, incidents and complaints received, in consultation with the Lodge Manager shall review all incidents and complaints, or direct a response as appropriate. Corrective action and other recommendations shall be made and documented.

1.10 Auditing

Auditing for the ESSRMP is to be carried out by the Environmental Social Manager or nominated representative on a regular basis to ensure that activities are undertaken in accordance with the objectives of the ESSRMP and to ensure that required outcomes are being achieved. All auditing will be undertaken by a competent person and documented to communicate the results of the audit to the Lodge Manager and the Proponent.

1.11 Review

The ESSRMP is a dynamic document that will be reviewed regularly and revised to reflect changes, new developments associated with the lodge and improved management strategies. Revisions will include, but not be limited to:

- inclusion of recommendations from environmental specialists, government officers, contractors, neighbours and conservation groups, or other formal, processes.
- inclusion of improvement measures determined as implementing the ESSRMP, in line with the continual improvement philosophy.
- updating of organisational structures as the lodge moves through the development and operational stages, with associated allocation of roles and responsibilities in line with the organisational structure.
- inclusion of relevant approval conditions arising from the approval and subsequent permits, authorities and/or licenses; and

• inclusion of any site-specific elements relevant to new developments as they occur during the life of the lodge.

Additional revisions will occur on an as-needs basis, including revisions to address items identified during incident investigations, inspections or audits.

	Oct 2017 Oct 2023			
Next reviewal	scheduled	Oct 2026	 	
Signed			 	
Position			 	
Date				