

ECC-141-475-LET-02-D

15 November 2023

Ministry of Environment, Forestry and Tourism
Private Bag 13306
Windhoek
Namibia

RECEIVED BY OFFICIAL STAMP

Signature: _____

Date: / /

**FOR ATTENTION: MR TIMOTEUS MUFETI – ENVIRONMENTAL COMMISSIONER
(MINISTRY OF ENVIRONMENT, FORESTRY AND TOURISM)**

**RE – SUBMISSION OF ENVIRONMENTAL MANAGEMENT PLAN FOR THE TOURISM-RELATED
ACTIVITIES OF THE EXISTING AND OPERATIONAL LODGE DAMARALAND (APP-231115002477)**

Dear Mr Mufeti,

Environmental Compliance Consultancy (ECC) has been contracted by Damaraland Lodge CC to apply for an environmental clearance certificate, for the tourism-related activities at existing and operational Lodge Damaraland on portion 14 of Farm Khorixas Townlands No 884 in the Kunene Region, Namibia. (APP – 231115002477)

For this project, ECC proposes to develop a comprehensive environmental management plan (EMP) for the following reason; Lodge Damaraland is situated in the Khorixas townland and is on a portion of land which is only 5.5 hectares in size. Small lodges by nature have limited environmental footprints and low potential for significant adverse impacts on their surroundings. Thus, subjecting them to a full-blown Environmental Impact Assessment (EIA) could be excessively resource intensive.

In terms of Section 32 (1) of the Environmental Management Act, (EMA) No. 7 of 2007 ECC hereby submits the environmental management plan (EMP) and appendices (in hardcopy) to you as the competent authority.

The report plus the appendices can also be accessed via our website:

<https://eccenvironmental.com/download/the-operation-of-the-existing-lodge-damaraland-on-portion-14-of-the-farm-khorixas-townlands-no-884-kunene-region-namibia/>

Environmental Compliance Consultancy (Pty) Ltd

PO Box 91103 Klein Windhoek Namibia

info@eccenvironmental.com

www.eccenvironmental.com

+264 81 669 7608



Should you or your office require our assistance with the details in this letter or report, please do not hesitate to contact us; we will gladly assist. We look forward to hearing from you at your earliest convenience.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Stephan Bezuidenhout', written over a light grey circular stamp.

Stephan Bezuidenhout

stephan@eccenvironmental.com

A handwritten signature in black ink, appearing to read 'Jessica Bezuidenhout Mooney', written over a light grey circular stamp.

Jessica Bezuidenhout Mooney

jessica@eccenvironmental.com

REPUBLIC OF NAMIBIA

ENVIRONMENTAL MANAGEMENT ACT, 2007

(Section 32)

**APPLICATION FOR ENVIRONMENTAL CLEARANCE
CERTIFICATE**

PROJECT REGISTRATION

Revenue
stamp or
revenue
franking
machine
impression

PART A: DETAILS OF APPLICANT

1. Name: (person or business):

Damaraland Lodge CC

2. Business Registration / Identity No.:

Damaraland Lodge CC: CC/2018/07909

Environmental Compliance Consultancy: Reg. No. 2022/0593

3. Correspondence Address:

Mr Danie van Wyk
Damaraland Lodge CC
P.O Box 90909
Windhoek
Namibia
Email: info@eccenvironmental.com

4. Name of Contact Person:

Mr Stephan Bezuidenhout

5. Position of Contact Person:

Principal Environmental Practitioner

6. Telephone No.:

+264 81 6697608

7. Fax Number:

NA

8. E-mail Address: (if any)

info@eccenvironmental.com

PART B: SCOPE OF THE ENVIRONMENTAL CLEARANCE CERTIFICATE

1. The environmental clearance certificate is for

The application is for the tourism-related activities at the existing and operational Lodge Damaraland situated on portion Portion 14 of farm Khorixas Townlands no 884, Kunene Region, Namibia.

Listed activities triggered by the project include:

LISTED ACTIVITY	EIA SCREENING FINDING
<p>WASTE MANAGEMENT, TREATMENT, HANDLING AND DISPOSAL ACTIVITIES (2.3) The import, processing, use and recycling, temporary storage, transit or export of waste.</p>	<p>- This project involves the temporary storage of general waste. Waste is collected by the Municipality and disposed of at the Municipal Landfill Site.</p>
<p>TOURISM DEVELOPMENT ACTIVITIES (6.) The construction of resorts, lodges, hotels or other tourism and hospitality facilities.</p>	<p>- The following infrastructure has been constructed on site: Main building with restaurant, swimming pool, 30 guest rooms and 1 manager house.</p>
<p>WATER RESOURCE DEVELOPMENTS (8.1) The abstraction of ground or surface water for industrial or commercial purposes.</p>	<p>- There is one borehole on-site, which is unfit for human consumption and is used for the watering of indigenous plants on-site.</p>
<p>HAZARDOUS SUBSTANCE TREATMENT, HANDLING AND STORAGE (9.1) The manufacturing, storage, handling or processing of a hazardous substance defined in the Hazardous Substances Ordinance, 1974.</p> <p>(9.2) Any process or activity which requires a permit, licence or other form of authorisation, or the modification of or changes to existing facilities for any process or activity which requires an amendment of an existing permit, licence or authorisation or which requires a new permit, licence or authorisation in terms of a law governing the generation or release of emissions, pollution, effluent or waste.</p>	<p>- A Septic tank system has been installed on-site and includes the following: Septic tank with 2 tanks (3456 l and 1728 l) with a 7 m soak away trench on the 2nd tank outlet. 4 x Septic tanks on-site (same design, but 2 different sizes).</p>
<p>LAND USE AND DEVELOPMENT ACTIVITIES 5.3) Construction of veterinary protected area or game proof and international boundary fences.</p>	<p>- A fence has been constructed around the lodge for security purposes.</p>
<p>OTHER ACTIVITIES (11.2) Construction of cemeteries, camping, leisure and recreation sites.</p>	<p>- The lodge does provide leisure and recreation activities.</p>

2. Details of the activity(s) covered by the environmental clearance certificate:

Title of Activity: The operation of the existing Lodge Damaraland on portion 14 of the farm Khorixas Townlands no 884, Kunene Region, Namibia

Nature of Activity:

The operation of an existing tourism lodge.

Scale and Scope of Activity:

All infrastructure falls within the boundaries of portion 14 of the farm Khorixas Townlands no 884, which is 5.5006 ha in size. The following infrastructure is currently on site:

- Main building with a restaurant,
- Swimming pool,
- 30 guest rooms, and
- 1 manager house.

Location of Activity:

Kunene Region, Namibia.

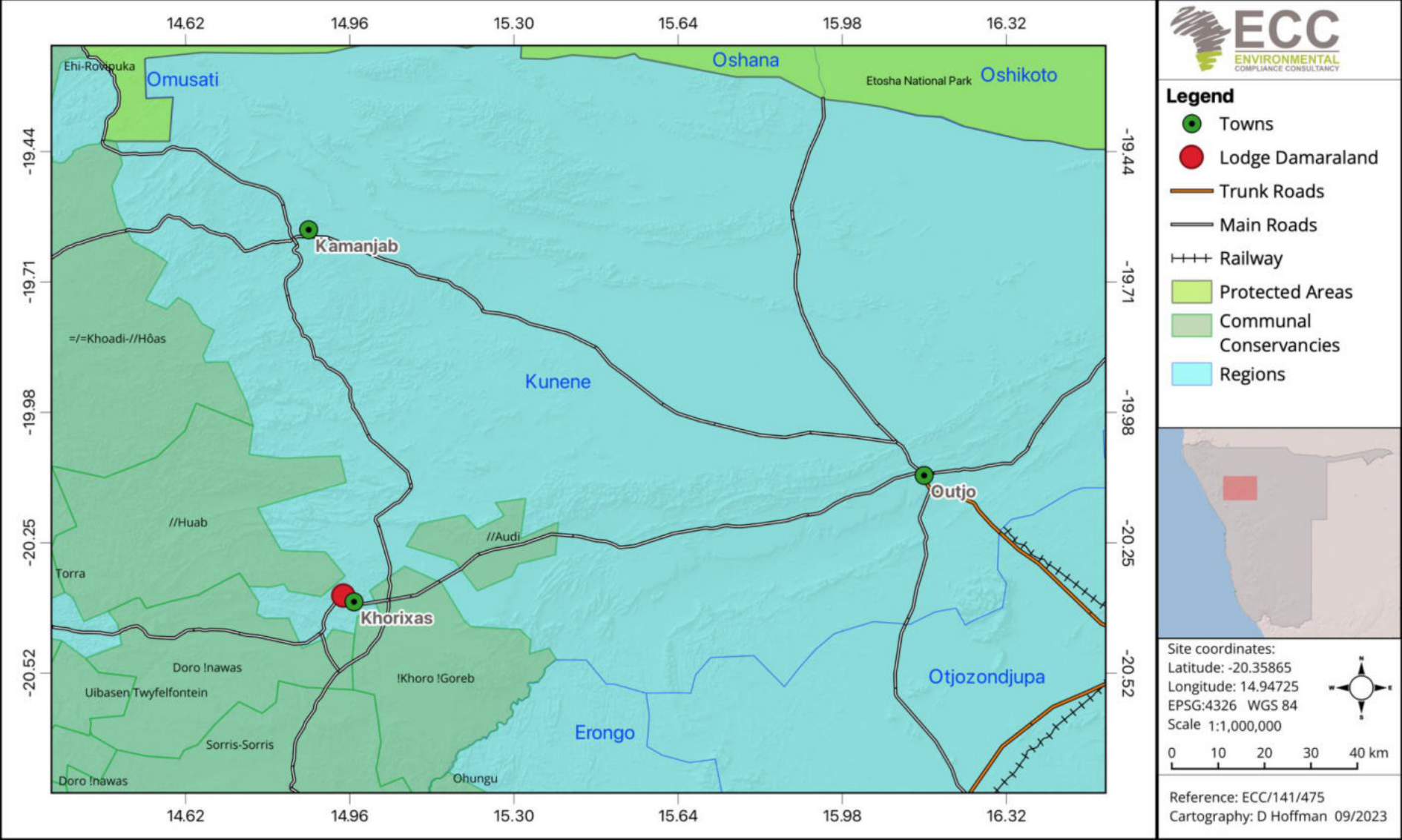


FIGURE 1 – Location of Lodge Damaraland.

PART C: DECLARATION BY APPLICANT

I hereby certify that the particulars given above are correct and true to the best of my knowledge and belief. I understand the Environmental Clearance Certificate may be suspended, amended or cancelled if any information given above is false, misleading, wrong or incomplete.



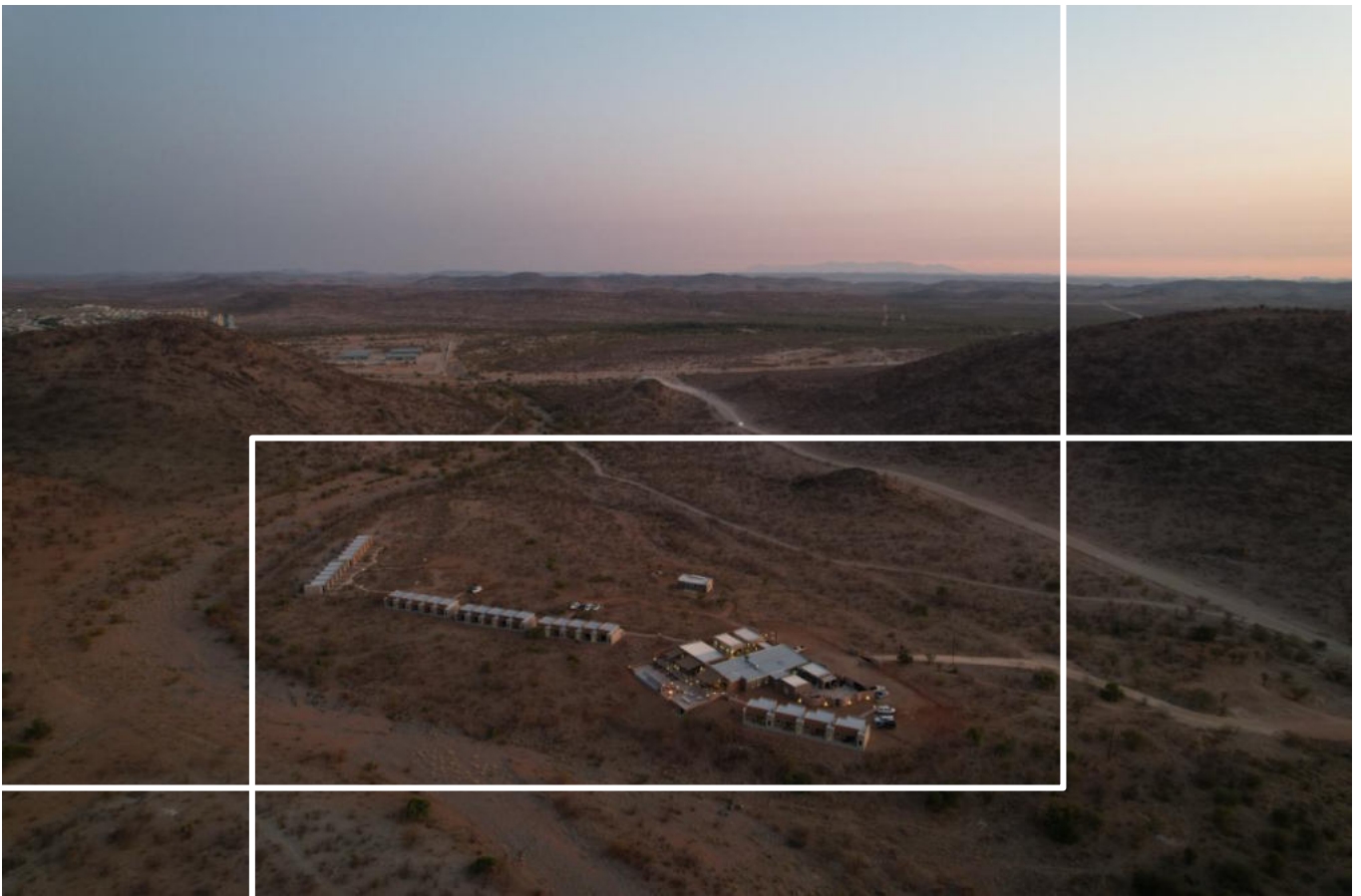
Signature of Applicant

STEPHAN BEZUIDENHOUT
Full name in Block Letters

PRINCIPAL DIRECTOR
Position

On behalf of: Damaraland Lodge CC

Date: 15/11/2023



Submitted to: Damaraland Lodge CC
Attention: Mr. Danie van Wyk
P O Box 90909
Windhoek, Namibia

REPORT:

EMP FOR THE EXISTING LODGE DAMARALAND, KUNENE REGION, NAMIBIA.

PROJECT NUMBER: ECC-141-475-REP-05-D

REPORT VERSION: REV 01

DATE: NOVEMBER 2023



TITLE AND APPROVAL PAGE

Project Name:	EMP for the existing Lodge Damaraland, Kunene Region, Namibia.
Client Company Name:	Damaraland Lodge CC
Authors:	Diaan Hoffman
Ministry Reference:	APP - 231115002477
Status of Report:	Final for MEFT Submission
Project Number:	ECC-141-475-REP-05-D
Date of issue:	November 2023
Review Period:	N/A

ENVIRONMENTAL COMPLIANCE CONSULTANCY CONTACT DETAILS:

We welcome any enquiries regarding this document and its content. Please contact:



Environmental Compliance Consultancy
PO Box 91193, Klein Windhoek, Namibia
Tel: +264 81 669 7608
Email: info@eccenvironmental.com

DISCLAIMER

The report has been prepared by Environmental Compliance Consultancy (Pty) Ltd (ECC) (Reg. No. 2022/0593) on behalf of the Proponent. Authored by ECC employees with no material interest in the report's outcome, ECC maintains independence from the Proponent and has no financial interest in the Project apart from fair remuneration for professional fees. Payment of fees is not contingent on the report's results or any government decision. ECC members or employees are not, and do not intend to be, employed by the Proponent, nor do they hold any shareholding in the Project. Personal views expressed by the writer may not reflect ECC or its client's views. The environmental report's information is based on the best available data and professional judgment at the time of writing. However, please note that environmental conditions can change rapidly, and the accuracy, completeness, or currency of the information cannot be guaranteed.

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ABBREVIATIONS

Abbreviation	Description
<	Less than
>	Greater than
°C	degrees celsius
dB	decibels
ECC	Environmental Compliance Consultancy (Pty) Ltd
EIA	environmental impact assessment
EMP	environmental management plan
GPS	Global Positioning System
IFC	International Finance Corporation
Km/h	kilometre per hour
kVA	Kilo-volt-amperes
m	metre
m ³	Cubic metre
MAWLR	Ministry of Agriculture, Water and Land Reform
MSDS	material safety data sheet
MEFT	Ministry of Environment, Forestry and Tourism
MME	Ministry of Mines and Energy
Ltd.	Limited
PPE	personnel protective equipment
Pty	proprietary
OSH	occupational safety health
SHE	safety health and environment

1 INTRODUCTION

1.1 PROJECT BACKGROUND

Environmental Compliance Consultancy (ECC) has been contracted by Damaraland Lodge CC (herein referred to as 'the proponent') to develop a comprehensive environmental management plan (EMP) and apply for an environmental clearance certificate for the tourism-related activities at the existing and operational Lodge Damaraland situated on Portion 14 of the farm Khorixas Townlands no 884, Kunene Region, Namibia.

Lodge Damaraland has been fully built and is currently in operation. Its construction took place since the start of 2023, culminating in the opening of the lodge to tourism in August 2023. Situated adjacent to the D2625 district road on Portion 14 of farm Khorixas Townlands no 884 in the Kunene Region, Namibia. Lodge Damaraland is strategically positioned, in Damaraland (2.2 km from Khorixas) and near Etosha National Park as depicted in Figure 1.

Lodge Damaraland forms part of a collection of lodges in Namibia under Quiver & Co.

1.2 PROJECT DESCRIPTION AND SITE LAYOUT

The entire infrastructure for this project is situated within the boundaries of portion 14 of the farm Khorixas Townlands no 884, encompassing an area of approximately 5.5 hectares as depicted in Figure 2 and APPENDIX A. An arial image of the lodge can also be seen in Figure 3.

The project site comprises several key components, including a main building designed to house a restaurant, a swimming pool, 30 guest rooms for accommodation, and a dedicated manager's house. To ensure the safety and security of the lodge, a perimeter fence has been thoughtfully constructed around the property.

Furthermore, an efficient septic tank system has been installed on-site, featuring two septic tanks with capacities of 3456 litres and 1728 litres, respectively. The second tank incorporates a 7-meter-long soak-away trench at its outlet. There are a total of four septic tanks on-site, all following the same design but varying in size. The design of the sewage systems can be seen in APPENDIX B.

In terms of guest capacity, this lodge can comfortably accommodate 86 guests daily while employing around 25 staff members to operate efficiently.

The lodge benefits from a municipal water supply on its premises, ensuring a consistent and accessible source of water for its operations. Additionally, it is powered by a 3-phase electrical supply provided by Cenored, with a capacity of 200 kVA.

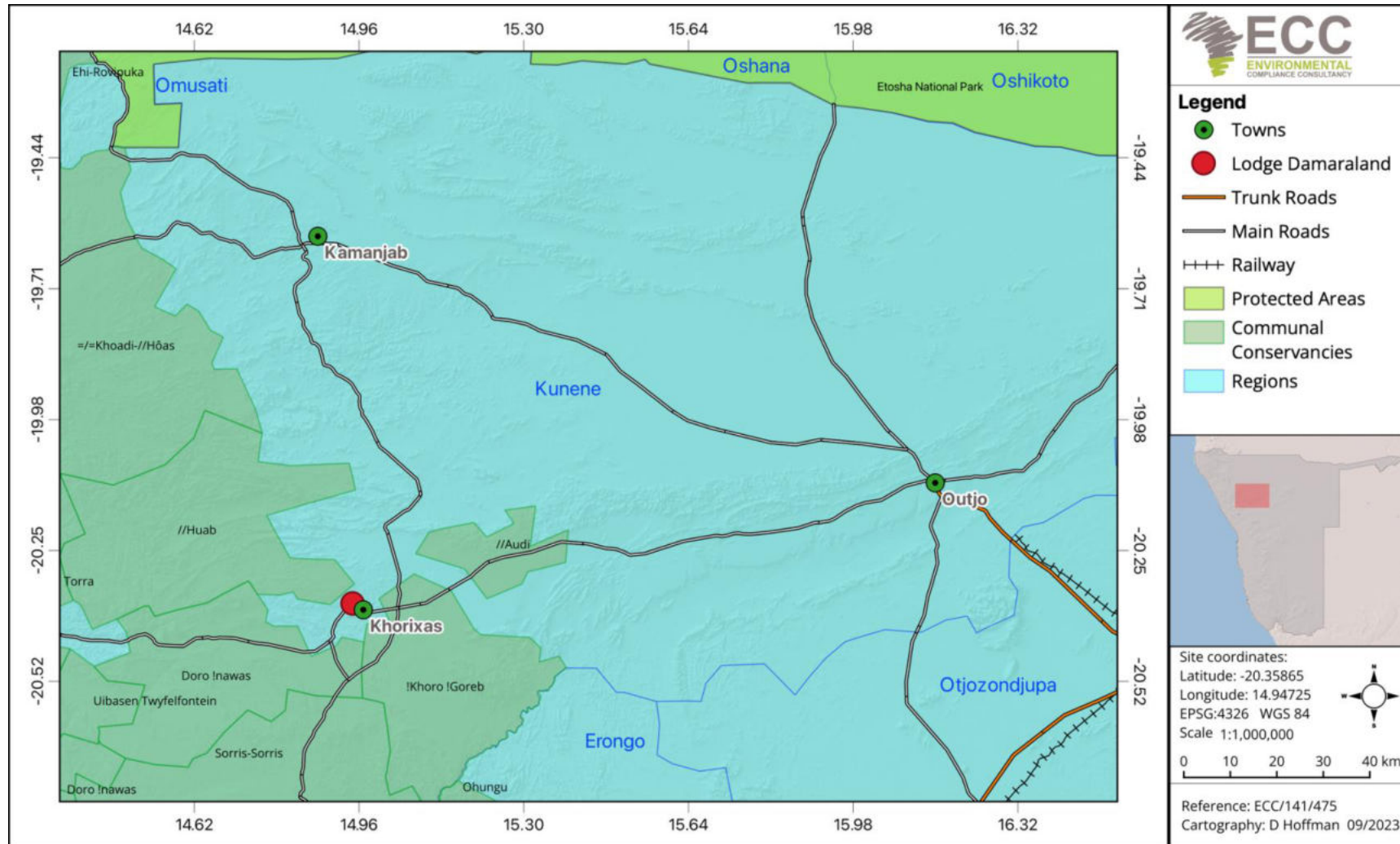


Figure 1 - Location of Lodge Damaraland

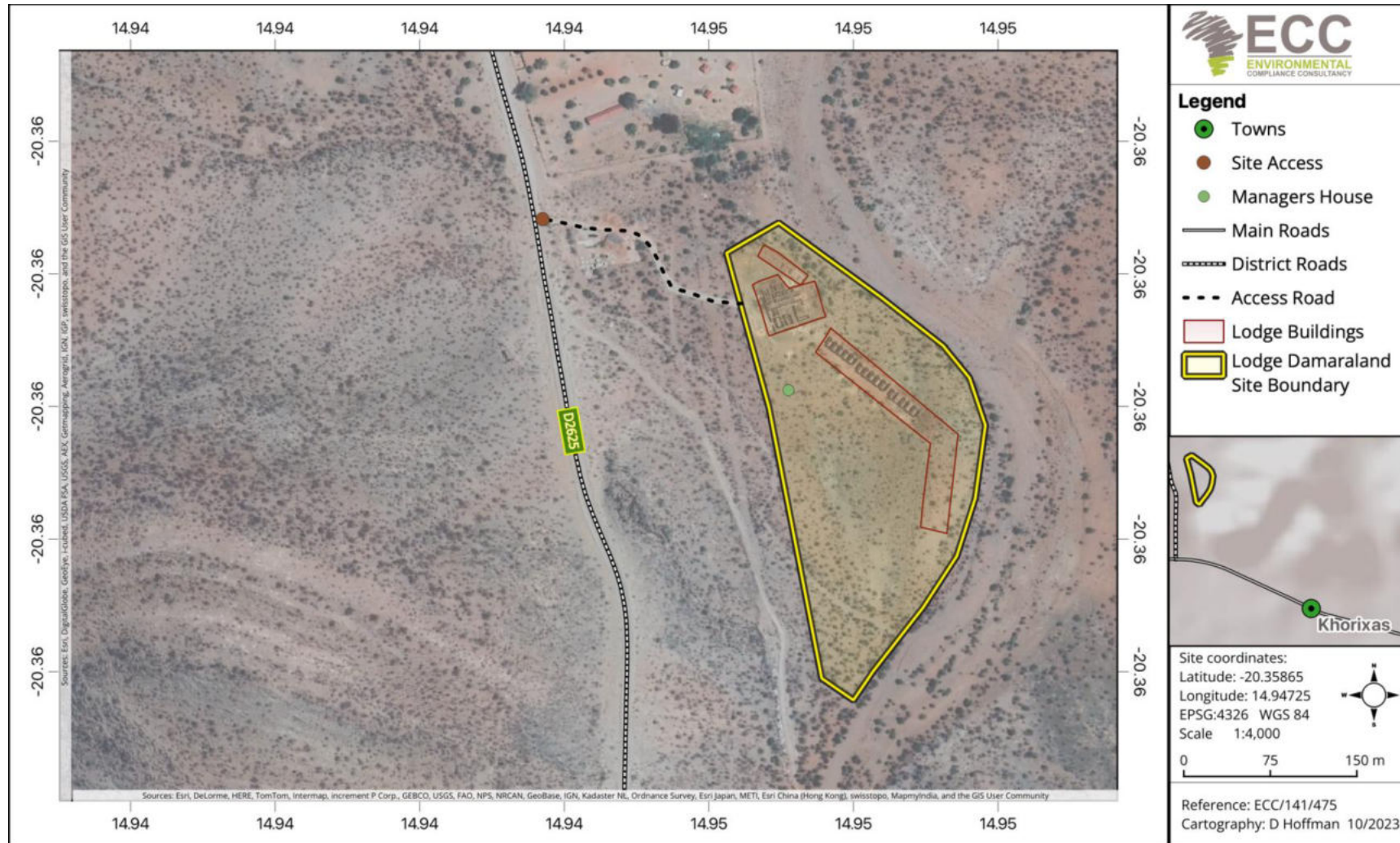


Figure 2 - Site layout map of Lodge Damaraland



Figure 3 - Aerial footage of Lodge Damaraland

1.3 BIOPHYSICAL ENVIRONMENT INFORMATION

This section provides an overview of the existing biophysical environment through the analysis of the available baseline data regarding the receiving environment.

Lodge Damaraland is in the Kunene Region near Khorixas as seen in Figure 1, nestled at an elevation of approximately 966 meters above sea level. This region experiences an average annual rainfall ranging from 200 to 250 mm, with distinct climatic conditions characterized by warm summers and cool winters, with a mean annual temperature of $> 22^{\circ}\text{C}$. The maximum temperatures generally range between 27°C and 35°C , while the minimum temperatures vary from 7°C to 20°C . Notably, the hottest months occur between September and January, while the coolest months fall in June and July (Bubenzer, 2002 & meteoblue, 2023).

The site lies within the western highlands vegetation type and is characterized by a sparse shrubland structure, which is part of the broader Savanna biome. In terms of terrestrial diversity, this area exhibits a low to moderate profile when compared to other regions in the country.

Geologically, this area is composed of the Epupa, Huab and Abbabis Metamorphic Complexes and the dominant soil in the area is lithic Leptosols (Buzenher, 2002).

The site's location places it within the Kunene south groundwater basin and falls within the Huab catchment area (Bubenzer, 2002 & Mendelsohn et al., 2002).

1.4 ENVIRONMENTAL REGULATORY REQUIREMENTS

The project triggers listed activities as stipulated in the Environmental Management Act, No. 7 of 2007 and its Regulations, promulgated in 2012. An environmental scoping report, environmental impact assessment (EIA) and environmental management plan (EMP) are required to be submitted as part of the application to support the decision-making process for issuing an environmental clearance certificate.

For this project, ECC proposes to only develop a comprehensive environmental management plan (EMP) for the following reason Lodge Damaraland is situated in the Khorixas townland and is on a portion of land which is only 5.5 hectares in size. Small lodges by nature have limited environmental footprints and low potential for significant adverse impacts on their surroundings. Thus, subjecting them to a full-blown Environmental Impact Assessment (EIA) could be excessively resource intensive.

This report presents the EMP which has been undertaken in terms of the requirements of the Environmental Management Act, 2007 and its Regulations.

Legislation that should be adhered to or is relevant to the Project includes the following as mentioned in Table 1.

Table 1 - Applicable laws, regulations and best practice methods

National Regulatory Regime	Relevance To the Project
Constitution of the Republic of Namibia of 1990	Social protection
Atmospheric Pollution Prevention Ordinance 11 of 1976	Social and biophysical landscape protection
Environmental Management Act, No. 7 of 2007 and its regulations, including the Environmental Impact Assessment Regulations, No. 30 of 2012	Environmental management
Soil Conservation Act, No. 76 of 1969 and the Soil Conservation Amendment Act, No. 38 of 1971	Biophysical protection
Water Resources Management Regulations (No. 269 Of 2023): Water Resources Management Act, 2013.	Water source protection
The Forestry Act, No. 12 of 2001 as amended by the Forest Amendment Act, No. 13 of 2005	Vegetation protection
Nature Conservation Ordinance Act No. 4 of 1975 and its regulations.	Biodiversity protection
Labour Act, No. 11 of 2007 and regulations relating to the Health and Safety of Employees at Work (No. 156 of 1997)	Social protection
National Heritage Act, No. 27 of 2004.	Heritage protection
Namibia Tourism Board Act (No. 21 of 2000) and Regulations relating to Levy Payable by Accommodation Establishments Government Notice 137 of 2004	Regulatory board
Draft Pollution Control; and Waste Management Bill (1999)	Biophysical landscape protection
Hazardous Substances Ordinance Ordinance No. 14 of 1974	Biophysical landscape protection

1.5 PURPOSE AND SCOPE OF THIS REPORT

The environmental management plan (EMP) provides a logical framework, mitigation measures and management strategies for the activities associated with the proposed project. In this way ensuring that the potential environmental impacts are curbed and minimised as far as practically possible and that statutory and other legal obligations are adhered to and fulfilled. Outlined in the EMP are the protocols, procedures and roles and responsibilities to ensure the management arrangements are effectively and appropriately implemented.

This EMP is a live document and shall be reviewed at predetermined intervals, and or updated when or if the scope of work alters, or when further data or information is added. All personnel working on the project will be legally required to comply with the requirements set out in the final EMP that is approved by the competent authorities and the Ministry of Environment, Forestry and Tourism (MEFT).

1.6 MANAGEMENT OF THIS EMP

The proponent will hold the environmental clearance certificate for the proposed project and will be responsible for the implementation and management of this EMP. The implementation and management of this EMP, and thus the monitoring of compliance, will be undertaken through daily duties and activities, as well as monthly inspections.

1.7 LIMITATIONS, UNCERTAINTIES, AND ASSUMPTIONS RELATED TO THIS EMP

This EMP does not include measures for compliance with statutory occupational health and safety requirements. This will be provided in the safety management plan to be developed by the proponent.

Where there is any conflict between the provisions of this EMP and any contractor's obligations under their respective contracts, including statutory requirements (such as licences, project approval conditions, permits, standards, guidelines, and relevant laws), the contract should be amended, and statutory requirements are to take precedence.

The information contained in this EMP is based on the project description as provided in this document. Where the design or operation method is different, this EMP may require updating and potential further assessment may be undertaken.

1.8 ENVIRONMENTAL ASSESSMENT PRACTITIONER

The report has been prepared by Environmental Compliance Consultancy (Pty) Ltd (ECC) (Reg. No. 2022/0593) on behalf of the Proponent. Authored by ECC employees with no material interest in the report's outcome, ECC maintains independence from the Proponent and has no financial interest in the project apart from fair remuneration for professional fees. Payment of fees is not contingent on the report's results or any government decision. ECC members or employees are not, and do not intend to be, employed by the Proponent, nor do they hold any shareholding in the project. Personal views expressed by the writer may not reflect ECC or its client's views. The environmental report's information is based on the best available data and professional judgment at the time of writing. However, please note that environmental conditions can change rapidly, and the accuracy, completeness, or currency of the information cannot be guaranteed.

All compliance and regulatory requirements regarding this report should be forwarded by email or posted to the following address:

Environmental Compliance Consultancy
PO Box 91193, Klein Windhoek, Namibia
Tel: +264 81 669 7608
Email: info@eccenvironmental.com

2 ENVIRONMENTAL MANAGEMENT FRAMEWORK

2.1 OBJECTIVES AND TARGETS

Environmental objectives and targets have been developed so that lodge operations can minimise potential impacts on the environment, as far as reasonably practicable.

Environmental objectives for the project are as follows:

- Zero pollution incidents;
- Minimal impact on regional groundwater users;
- Protect local flora and fauna, and
- Use natural resources effectively and efficiently.

2.2 ORGANISATIONAL STRUCTURE, ROLES, AND RESPONSIBILITIES

The Proponent shall be responsible for:

- Ensuring all members of the project team, including contractors, comply with the procedures set out in this EMP;
- Ensuring that all persons are provided with sufficient training, supervision, and instruction to fulfil this requirement;
- Ensuring that any persons allocated specific environmental responsibilities are notified of their appointment and confirm that their responsibilities are clearly understood; and
- Contractors shall be responsible for ensuring and demonstrating that all personnel employed by them are compliant with this EMP, and meet the responsibilities listed above.

Table 2 lists the roles and responsibilities allocated to different management levels in the company and specific personnel.

Table 2 – Roles and responsibilities

Role	Responsibilities And Duties
General /Lodge Manager (Proponent)	<ul style="list-style-type: none"> - Responsible for ensuring compliance with this EMP; - Ensuring employees understand and comply with the requirements of this EMP; - Ensuring that all personnel are provided with enough training, supervision and instructions to fulfil this requirement; - Ensuring compliance with this EMP including overseeing the day-to-day activities during operations, and routine and non-routine maintenance works during operations; - Ensure the environmental policy is communicated to all personnel;

Role	Responsibilities And Duties
	<ul style="list-style-type: none"> - Responsible for providing the required resources (including financial and technical) to complete any required tasks; - Responsible for the management, maintenance and revisions of this EMP; - Maintain community issues and concerns register and keep records of complaints and responses provided; - Maintain an up-to-date register(s) of employees who have completed the site induction; - Ensure that best environmental practice is undertaken throughout the operations of the facility; - Notifying the relevant authorities of serious environmental incidents promptly; - Being responsible for all management plans and environmental monitoring; and - Receiving, recording, and responding to environment-related complaints received from the public and other stakeholders.
<p>Foreman (Appointed HSE responsible person)</p>	<p>The lodge foreman will be responsible for the implementation of the EMP for the lodge. The foreman will be available as required throughout the operation of the lodge and is tasked with the following roles:</p> <ul style="list-style-type: none"> - Bearing authority and independence to demand reasonable steps as required to avoid or minimise unintended or adverse environmental impacts, and failing the effectiveness of such steps, to direct that relevant construction/maintenance activities be ceased immediately should an adverse impact on the environment be likely to occur; - Complete weekly checklists and submit findings to the general/lodge manager; - Complete monthly EMP checklists and submit findings to the general/lodge manager; - Provisioning of environmental awareness/management training, capacity building and inductions; - Ensuring that best environmental practices are undertaken throughout the operations of the lodge; - Timely distribution of any relevant environmental documentation, including revisions to this EMP to all staff; - Ensuring site inductions are conducted throughout the different phases of the Project; - Reporting of any operations and conditions that deviate from the EMP or any non-compliant issues or accidents to the Proponent; and

Role	Responsibilities And Duties
	<ul style="list-style-type: none"> - Responsible for compliance with conditions as set out in this EMP.
Employees, contractors and visitors	<p>Contractors hired for operations or maintenance activities at the lodge should comply with this EMP and shall be responsible for the following:</p> <ul style="list-style-type: none"> - Undertaking activities in accordance with this EMP as well as relevant policies, procedures, management plans, statutory requirements and contract requirements; - Implementing appropriate environmental management measures; - Reporting environmental issues, including actual or potential environmental incidents and hazards to the Proponent or foreman; and - Ensuring appropriate corrective or remedial actions are taken to address all environmental hazards and incidents.

2.3 EMPLOYMENT

The Proponent and all contractors shall comply with the requirements of the Republic of Namibia’s regulations for Labour, Health and Safety, and any amendments to these regulations. The following shall be complied with:

- In liaison with local government and community authorities, the Proponent shall ensure that local people have access to information about job opportunities and are considered first for construction/maintenance contract employment positions;
- The number of job opportunities shall be made known together with the associated skills and required qualifications;
- The maximum length of time the job is likely to last shall be indicated;
- Foreign workers with no proof of permanent legal residence shall not be hired;
- Every effort shall be made to recruit from the group of unemployed workers living in the surrounding area; and
- Every employee hired must be provided with a valid employment contract stating the position hired and the hourly remuneration offered.

3 COMMUNICATION AND TRAINING

To ensure potential risks and impacts are minimised, personnel must be appropriately informed and trained on how to properly implement the EMP. It is also important that regular communications are maintained with stakeholders (if applicable) and made aware of potential impacts and how to minimise or avoid them. This section sets out the framework for communication and training in relation to the EMP.

3.1 COMMUNICATIONS

During any new construction or maintenance, the project manager and site manager shall communicate site-wide environmental issues to the project team through the following means (as and when required):

- Site induction;
- Audits and site inspections;
- Toolbox talks, including instruction on incident response procedure, and
- Briefings on key project-specific environmental issues, like feedback on complaints.

This EMP shall be distributed to the construction team including any contractors to ensure that the environmental requirements are adequately communicated. Key activities and environmentally sensitive operations will be highlighted to workers and contractors.

Communications between the management team shall include discussing any complaints received and actions to resolve them, - any inspections, audits, or non-conformance with this EMP, and any objectives or target achievements.

3.2 ENVIRONMENTAL EMERGENCY AND RESPONSE

An emergency is any abnormal event, which demands immediate attention. It is any unplanned event, which results in the temporary loss of management control at the site, but where functional resources can manage the response. An emergency response plan document will be put in place that manages the response in relation to emergencies including environmental emergencies. Table 3 contains a list of emergency contact numbers.

Table 3 - Emergency contact details

Town	Ambulance	Police	Fire Brigade
Khorixas	+264 67 331064	+264 67 10111	+264 67 331057

For large-scale spills (i.e., greater than 200 litres) and other significant environmental incidents, the fire service should be notified as required and MEFT office should be informed of the incidents (telephone +264 61 284 2111) as well as the Ministry of Mines and Energy (MME) by completing form PP/11. All correspondence with MME/MEFT should be undertaken by the general manager as guided by the foreman.

3.3 COMPLAINTS HANDLING AND RECORDING

Any complaints received verbally by any personnel on the project site shall be recorded by the receiver including:

- The name of the complainant
- The contact details of the complainant
- Date and time of the complaint
- The nature of the complaint

The information shall be given to the project manager who is overall responsible for the management of complaints. The project manager shall do the following:

- Inform the site manager of issues, concerns, or complaints;
- Maintain a complaint register that required details of the complaint; and
- Provide a written response to the complainant of the results of the investigation and action to be taken to rectify or address the matter(s). Where no action is taken, the reasons why are to be recorded in the register.

The workforce shall be informed about the complaints register, its location and the person responsible, to refer residents or the public who wish to lodge a complaint. The complaints register shall be kept for the duration of the Project and will be available for government or public review upon request.

3.4 TRAINING AND AWARENESS

All personnel working on the project shall be competent to perform tasks that have the potential to cause an environmental impact. Competence is defined in terms of appropriate education, training, and experience.

3.5 SITE INDUCTION

All personnel involved in the project shall be inducted to the site with specific environmental and social awareness training, and health and safety issues. The environmental and social awareness training shall ensure that personnel are familiar with the principles of this EMP, the environmental impacts associated with their activities, the procedures in place to control these impacts and the consequences of departure from these procedures. The project manager shall ensure a register of completed training is maintained.

The site induction should include, but is not limited to the following:

A general site-specific induction that outlines:

- What is meant by “environment” and “social”;
- What are the environmental risks and impacts associated with lodge operations;
- How can any additional construction/maintenance activities impact the environment;
and
- What can be done to mitigate against impacts.

The inductee's role and responsibilities concerning implementing the EMP:

- The site's environmental rules;
- Details of how to deal with, and who to contact should any environmental problems occur;
- The potential consequences of non-compliance with this EMP and relevant statutory requirements, and
- The role of responsible people working on the project.

4 REPORTING, COMPLIANCE AND ENFORCEMENT

4.1 OPERATIONS: ENVIRONMENTAL INSPECTIONS AND COMPLIANCE MONITORING

Annual inspections of the different lodge operational areas will be undertaken by the general manager to determine any non-conformances. Any non-conformance will be recorded, including the following details: a brief description of non-conformance; the reason for the non-conformance; the responsible party; the result (consequence); the corrective action taken and any necessary follow-up measures required.

4.2 REPORTING

There will be a requirement to ensure that any incident or non-compliance, including any environmental issue, failure of equipment or accident, is reported to the lodge manager.

4.3 NON-COMPLIANCE

Where it has been identified that works are not compliant with this EMP, the general/lodge manager will implement corrective actions to the extent that the works return to being compliant as soon as possible. In instances where the requirements of the EMP are not upheld, a non-conformance and corrective action notice will be produced. The notice will be generated during the inspections and the project manager will be responsible for ensuring a corrective action plan is established and implemented to address the identified shortcoming.

Activities shall be stopped in the event of a non-compliant event identified until corrective actions have been completed.

4.4 INCIDENT REPORTING

The general manager must ensure that an accident and incident (including minor or near-miss) reporting system is maintained by the foreman so that all applicable statutory requirements are covered. For any serious incident involving a fatality, or permanent disability, the incident scene must be left untouched until witnessed by a representative of the police. This requirement does not preclude immediate first aid being administered and the location being made safe.

The foreman must investigate the cause of all work accidents and significant incidents and must provide the results of the investigation and recommendations on how to prevent a recurrence of such incidents. A formal root-cause investigation process should be followed.

4.5 DISCIPLINARY ACTION

This EMP is a legally binding document and non-compliance with it shall result in disciplinary action being taken against the perpetrator(s). Such action may take the form of (but is not limited to):

- Fine/penalties;
- Legal action;
- Monetary penalties imposed by the Proponent on the contractor;
- Withdrawal of licence; and
- Suspension of work.

The disciplinary action shall be determined according to the nature and extent of the transgression / non-compliance, and penalties are to be weighed against the severity of the incident.

4.6 RELEVANT PERMITS

Ensure that the project complies with the Water Resources Management Regulations (No. 269 Of 2023): Water Resources Management Act, 2013.

Table 4 gives an overview of the permits that are or might be required for the Project.

Table 4 - Permit requirements.

Permit, Licences or Registration	Relevant Authority	Project Bearing
Water abstraction permits (if applicable)	Ministry of Agriculture, Water and Land Reform	An abstraction permit is required for the abstraction of water from a borehole for commercial purposes. Part 11 (Sections 44 - 45) of the Water Resources Management Act, 2013 and Part 5 (Sections 44 - 45) of the Water Resources Management Regulations (No. 269 Of 2023).
Effluent discharge or Sewage Permits	Ministry of Agriculture, Water and Land Reform	Permits related to the sewage systems or effluent discharge should be obtained. Part 13 (sections 68 - 72) of the Water Resources Management Act No.11 of 2013 and Part 8 (Sections 66 - 68) of the Water Resources Management Regulations (No. 269 Of 2023).

5 ENVIRONMENTAL AND SOCIAL MANAGEMENT

5.1 ENVIRONMENTAL PERFORMANCE MEASUREMENT

This chapter provides a summary register of environmental risks and issues which identifies mitigation and mitigation measures as well as responsible party(ies). This chapter is subject to regular review by the Proponent and will be updated when necessary.

The Proponent will use this register to undertake monthly inspections to ensure the Project is compliant with the EMP.

5.2 REGISTER OF ENVIRONMENTAL RISKS AND ISSUES

An environmental review of the Project has been completed and from this, a schedule of environmental commitments and risks has been produced which details deliverables including measures identified for the prevention of pollution or damage to the environment during the project's lifetime (Table 5).

Table 5 provides a register of environmental risks and issues, which identifies mitigation and monitoring measures, as well as the responsible persons.

Table 5 - Environmental risks and issues, mitigations and monitoring measures

Aspect	Potential impacts	Management/mitigation measures	Monitoring requirements	Responsibility
Job creation, skills development and business opportunities	Beneficial socio-economic impacts on a local and regional scale	<ul style="list-style-type: none"> – Maximise local employment and local business opportunities; – Enhance the use of local labour and local skills as far as reasonably possible; and – Ensure that goods and services are sourced from the local and regional economy as far as reasonably possible. 	Monthly, annually	Lodge Manager Foreman
Air quality	Dust generation during construction /future maintenance activities.	<p>To minimise the potential for dust generation, the following management measures should be implemented, as required:</p> <ul style="list-style-type: none"> – Restrict speed of vehicles (<40 km/h); – Vehicles and machinery should be maintained to limit exhaust fume emissions; – Dust-generating activities should be avoided during strong wind events; – Where an effect is profound, ensure dust suppression measures are in place; and <p>Employees should use and wear appropriate PPE (e.g. dust masks).</p>	Daily	Lodge Manager Foreman Employees
Noise	Noise generation from maintenance or new	The Labour Act No.11 of 2007 and Regulations relating to the Health and Safety of Employees at Work (GN 156/177)	Daily	Lodge Manager Foreman

Aspect	Potential impacts	Management/mitigation measures	Monitoring requirements	Responsibility
	<p>construction activities leading to noise nuisance and potential hearing loss towards site-based employees and disturbance to biodiversity.</p>	<p>should be followed for occupational noise exposure (Chapter 6, section 197, sub-section 1-3). These sections state that no employee shall work in an environment where noise levels equal or exceed 85 dB.</p> <p>The following mitigation measures should be implemented, as required:</p> <ul style="list-style-type: none"> – The Proponent should develop a healthy and safety management plan that considers noise generation; – Restrict noise-generating activities to day- time operations; – Appropriate PPE should be worn during noise-generating activities (i.e., earplugs, earmuffs, ear protective equipment); – Vehicles on site should be maintained regularly to exhaust noise levels; and – Ensure noise complaints are recorded and responded to timeously. 		Employees
Occupational health and safety	Occupational health and safety concerns during the operational phase and potential	<p>To promote a safe and conducive working environment, the following mitigation measures should be considered:</p> <ul style="list-style-type: none"> – A health and safety management plan should be developed and implemented on-site by the Proponent; 	Daily	Foreman

Aspect	Potential impacts	Management/mitigation measures	Monitoring requirements	Responsibility
	future construction or maintenance phases.	<ul style="list-style-type: none"> - The Proponent does have an emergency evacuation plan map in order as seen in APPENDIX A; - The Labour Act No.11 of 2007 and Regulations relating to occupational health and safety should be adhered to; - Appropriate PPE should be worn by employees (e.g., safety boots, overalls, and gloves). - Conduct safety induction for employees and employees should be trained on weapon handling; - Appropriate safety/warning signs should be erected in areas considered to cause a certain degree of harm; - Risk assessment in the workplace must be done to identify facility areas that could cause some degree of impact and suitable prevention measures should be identified; - Regular medical check-ups should be conducted on personnel to ascertain fitness for work levels (where required); - Frequent maintenance of all equipment and machinery; - Occupational incidents and accidents on-site should be reported to the authorities (i.e., Occupational Safety & Health (OSH) at the Ministry of Labour, Industrial Relation and Employment Creation, by using form F.5; - -Emergency contact details should be readily accessible or on display to contact relevant services in emergency situations; 		

Aspect	Potential impacts	Management/mitigation measures	Monitoring requirements	Responsibility
		<ul style="list-style-type: none"> - No un-authorized use of equipment should be allowed; - In the unlikely event of a death occurring within site boundaries from occupational negligence or otherwise from a "freak accident event", the area should be secured, and all personnel removed from the scene; - A root cause analysis of the event should be undertaken as soon as practicably possible; and - Counselling should be provided to the witnesses and other personnel member who may have been impacted by the event. 		
<p>Fire risks management</p>	<p>Potential risk of fire occurrences and veld fire leading to ecosystem breakdown.</p>	<ul style="list-style-type: none"> - Development of a fire management system through the process of risk identification and assessment; - Identify and signpost dedicated assembly points at the lodge area; - Developing site-specific work procedures as part of the fire management system; - Induction on fire prevention and toolbox talks; - Control and reduce the potential risk of fire by segregating and safe storage of flammable materials; - Avoid potential sources of ignition for example, by prohibiting smoking in and around areas where chemicals/fuel is stored; - Ensure suitable fire-extinguishing equipment is accessed immediately and conveniently whenever necessary. This 	<p>Weekly, monthly and yearly.</p>	<p>All staff</p>

Aspect	Potential impacts	Management/mitigation measures	Monitoring requirements	Responsibility
		<p>can include pails of water, buckets of sand, or portable extinguishers;</p> <ul style="list-style-type: none"> - For veld fires, appropriate firefighting equipment should be available on-site; - Emergency contact details should be readily available on-site; and - Ensure key personnel are trained to manage an emergency fire situation. 		
Biodiversity Conservation	The possibility of encountering and interacting with biodiversity on-site.	<p>The Nature Conservation Ordinance Act No. 4 of 1975 and its Regulations, Controlled Wildlife Products and Trade Act 9 of 2008 and the Animals Protection Act 71 of 1962 should be closely followed with regard to any encounters with wildlife within site boundaries.</p> <ul style="list-style-type: none"> - Wildlife encountered should be ethically treated; - No living organism should be removed from site boundaries by anyone other than by a professional/registered animal handler, pest control company, MEFT/MAWLR or relevant rehabilitation or wildlife organisations; - Prohibit illegal hunting, consumption and possession of game and game products (i.e., illicit trade of pangolins for scales); - Police and MEFT should be notified of any illegal hunting incident involving sensitive or protected species or if 	Daily, monthly and yearly.	Lodge Manager and Foreman

Aspect	Potential impacts	Management/mitigation measures	Monitoring requirements	Responsibility
		<p>such an animal is found on someone within or surrounding site boundary;</p> <ul style="list-style-type: none"> - Snares found on-site should be removed and destroyed; - Fences and the site boundary should be monitored for potential snares and traps; - All staff should be informed in writing about the consequences with regards to rules that are broken (i.e., possession of a firearm, illegal hunting, stock theft and removal of protected species etc.); - Nests discovered on infrastructure within site boundaries should not be removed or destroyed; - Pesticides and herbicides should not be used as far as reasonably possible; - If there is no other possibility, the relevant pesticides/herbicides/chemicals should be used by a professional/registered pest control company and the MSDS of the substance used should be followed closely; - Invasive plant species should be removed, and their spread should be prevented; and - Waste on-site should be well managed and removed from the site to prevent rodents, snakes and scorpions from breeding/living on-site. 		
	Potential avifauna collisions with	<ul style="list-style-type: none"> - Keep a record of all avifauna collisions and name of species or photographic evidence with dates; 	Daily, Monthly	Lodge Manager Foreman

Aspect	Potential impacts	Management/mitigation measures	Monitoring requirements	Responsibility
	powerline on-site or site boundary.	<ul style="list-style-type: none"> - Lighting on-site should preferably be a colour that does not attract insects, to prevent nocturnal birds from flying into the structures; - Increase monitoring during the rainy season (when pans, dams and drainage lines hold water); - If collisions increase additional bird deterrent measures could be implemented like Bird Flight Diverters (i.e., coils, flappers, etc.). 		
	There might be the potential removal of protected plant species during land clearing activities (i.e., In the case of expansion, maintenance or additional construction)	<p>To counteract the potential risk of removing certain protected plant species, the following control management measures should be implemented:</p> <ul style="list-style-type: none"> - Prior to any land clearing event, a site inspection should be conducted to determine the presence of any unique plant species; - Protected plant species should not be removed, without the relevant permission or permits; - Large trees or shrubs should not be removed (could be essential for breeding birds); - Identify rare, endangered, threatened and protected species; - Conduct toolbox talks and inductions, highlighting the importance of protected plant species; - Where possible, rescue and relocate plants of significance; - Promote revegetation of cleared areas upon completion of construction activities; 	Daily, monthly	Lodge Manager Foreman

Aspect	Potential impacts	Management/mitigation measures	Monitoring requirements	Responsibility
		<ul style="list-style-type: none"> - All project equipment arriving on-site from elsewhere should have an internal weed and seed inspection completed before such equipment is used, this will prevent the introduction of invasive species; - Ensure contractors receive induction on preventing the spread of alien weed; and - Ensure the correct removal of alien invasive vegetation and prevent the establishment and spread of alien invasive plants. 		
Heritage	Potential heritage discovery	<p>In case of discovering or unearthing undiscovered heritage sites, the following measures (chance-find procedure) shall be applied:</p> <ul style="list-style-type: none"> - Works to cease and the area to be demarcated with appropriate tape by staff, and the lodge manager to be informed; and - Archaeological/heritage artefacts/graves are to remain undisturbed until an investigation is conducted. 	Daily	All staff members
Soil pollution control	Emergency incidents/ accidental release of hazardous substances leading to soil contamination.	<p>The following measures should be taken into consideration regarding storage, handling and spill management of fuel, chemicals or hazardous substances:</p> <p>Storage</p>	Daily, monthly and yearly	All staff members

Aspect	Potential impacts	Management/mitigation measures	Monitoring requirements	Responsibility
		<ul style="list-style-type: none"> - Hazardous chemicals should be stored separately from non-hazardous chemicals; - Chemical containers should be labelled correctly- clear guidance on the compatibility of different chemicals can be obtained from the Materials Safety Data Sheets (MSDS) which should be readily available; - Store chemicals in a dedicated, enclosed, and secure facility with a roof and a paved/concrete floor; - Diesel tanks should be completely contained within secondary containment such as bundings (if applicable); - Consider the feasibility of substituting hazardous chemicals with less hazardous alternatives; and - Fuels, lubricants, and chemicals are to be stored within appropriately sized, impermeable bunds or trays with a capacity not less than 110% of the total volume of products stored. <p>Spills Spill kits with the following items as a minimum should be made available on-site:</p> <ul style="list-style-type: none"> - Absorbent materials; - Shovels; - Heavy-duty plastic bags; <ul style="list-style-type: none"> o Protective clothing (e.g., gloves and overalls); 		

Aspect	Potential impacts	Management/mitigation measures	Monitoring requirements	Responsibility
		<ul style="list-style-type: none"> – Major servicing of equipment shall be undertaken offsite or within appropriately equipped workshops; – For small repairs and required maintenance activities, all reasonable precautions to avoid oil and fuel spills must be taken (e.g., spill trays, impervious sheets); – Provision of adequate and frequent training on spill management, spill response and refuelling must be provided to all onsite staff; – No refuelling is to take place within 50 m (meters) of groundwater boreholes, surface water bodies or streams; – Vehicles and machinery are to be regularly serviced to minimise oil and fuel leaks; and – Should there be major petroleum product spills on site, (spill of more than 200 litres per spill) such incidences should be reported to the Ministry of Mines and Energy (MME) on Form PP/11 titled “Reporting of major petroleum product spill”. <p>The following points apply to all areas on site:</p> <ul style="list-style-type: none"> – Assess the situation for potential hazards; – Do not come into contact with the spilt substance until it has been characterised and necessary personal protective equipment (PPE) is provided; and 		

Aspect	Potential impacts	Management/mitigation measures	Monitoring requirements	Responsibility
		<ul style="list-style-type: none"> - Isolate the area as required. <p>Spill management procedures:</p> <ul style="list-style-type: none"> - Spills are to be stopped at the source as soon as possible (e.g., close valve or upright drum); - Spilt material is to be contained to the smallest area possible using a combination of absorbent material, earthen bunds or other containment methods; - Spilt material is to be recovered as soon as possible using appropriate equipment. In most cases, it will be necessary to excavate the underlying soils until clean soils are encountered; - -All contaminated materials recovered after a spill, including soils, absorbent pads and sawdust, are to be disposed of at an appropriately licenced facility; and - -A written incident report must be submitted to the lodge manager. 		
Groundwater pollution control	Possible nutrient enrichment of groundwater due to leakage of sewage into the groundwater. Potential risk associated with the	<ul style="list-style-type: none"> - Ensure compliance with the Water Resources Management Regulations (No. 269 Of 2023): Water Resources Management Act, 2013; - Specifically, Part 13 (sections 68 - 72) of the Water Resources Management Act No.11 of 2013 and Part 8 (Sections 66 - 68) of the Water Resources Management Regulations (No. 269 of 2023); 	Daily and weekly	Lodge Manager Foreman Employees

Aspect	Potential impacts	Management/mitigation measures	Monitoring requirements	Responsibility
	discharge of wastewater into the environment.	<ul style="list-style-type: none"> - Effluent waste discharge permits should be in place and permit conditions should be adhered to (if required); - The sewage treatment system needs to be well inspected for leakages at all times; - Effluent water should be tested yearly or as required, to ensure that it complies with relevant legislation and standards; - Effluent should not be discharged into a sensitive habitat/ area (i.e., dam, river or stream); and - If a major pipe burst or leak has been discovered in the sewage system groundwater needs to be monitored and tested to ensure that there is no contamination. 		
Groundwater management	Water usage	<ul style="list-style-type: none"> - Ensure compliance with the Water Resources Management Regulations (No. 269 Of 2023); Water Resources Management Act, 2013; - Adopt a water-wise mindset on site; - Water leakages or pipe bursts should be reported and fixed as soon as possible; - Should there be a desire for ornamental plants on site, drought-resistant species should be considered; - Eco-friendly and low water use equipment should be considered i.e. eco-friendly showerheads and taps (where possible); and 	Daily and weekly	Lodge Manager Foreman Employees

Aspect	Potential impacts	Management/mitigation measures	Monitoring requirements	Responsibility
		<ul style="list-style-type: none"> – Activities that require a lot of water should be monitored to ensure water is used efficiently. 		
Waste management	Possible sewage discharge runs the risk of pathogen /disease transmissions and odours.	<ul style="list-style-type: none"> – Ensure toilets are always clean and dry; – Provide adequate sanitary facilities, including clean water, soap, disposable paper towels; – Provide suitable personal protective equipment that may include waterproof/abrasion-resistant gloves, footwear, eye, and respiratory protection; – The monitoring of wastewater discharges should be conducted regularly (if applicable). 	Daily	All staff members
	Environmental pollution (littering and poor storage of solid waste)	<p>Waste management should follow the International Finance Corporation (IFC) standards as follows:</p> <ul style="list-style-type: none"> – Implement a waste management plan (from “cradle to grave” methodology) covering all aspects of waste generated on-site; – Training and toolbox talk about the importance of waste management; – Ensure a high standard of housekeeping across/within site boundaries; – Solid waste shall be stored in an appointed area in covered, tip-proof metal drums/skips for collection and disposal at an approved waste management site; 	Daily and weekly	All staff member

Aspect	Potential impacts	Management/mitigation measures	Monitoring requirements	Responsibility
		<ul style="list-style-type: none"> - The waste storage areas shall always be kept clean and tidy; - The proposed compost site should always be inspected regularly; - Ensure solid wastes on site are removed timeously to ward off unwanted scavengers; and - Implement the waste management hierarchy across the site: Avoid, reuse, recycle, and then dispose. 		

6 DECOMMISSIONING PHASE

In the event that the proponent plans to cease with lodge operation (and/or if ownership is transferred), the proponent and the new owner should mutually agree on the way ahead for the site and associated infrastructure. If the new owner intends not to use the infrastructure, the proponent will be responsible for removing all equipment, machinery, chemicals, fuel and any other element from the site. If infrastructure is removed at the decommissioning stage, it is recommended that the proponent implement a rehabilitation plan for the site to ensure that the site is returned to its natural state as feasibly possible and that no further degradation to the site is foreseen.

7 IMPLEMENTATION OF THE EMP

The operations of Lodge Damaraland will be carried out in compliance with the relevant regulations. Minor to moderately significant impacts are anticipated, hence management and mitigation measures are in place to eliminate or reduce the severity of potential impacts.

This environmental management plan:

- A. Has been prepared according to a contract with the proponent;
- B. Has been prepared based on information provided to ECC up to October 2023;
- C. Is for the sole use of the proponent, for the sole purpose of an EMP
- D. Must not be used (1) by any person other than the proponent or (2) for any purpose other than an EMP;
- E. Must not be copied without the prior written permission of ECC.

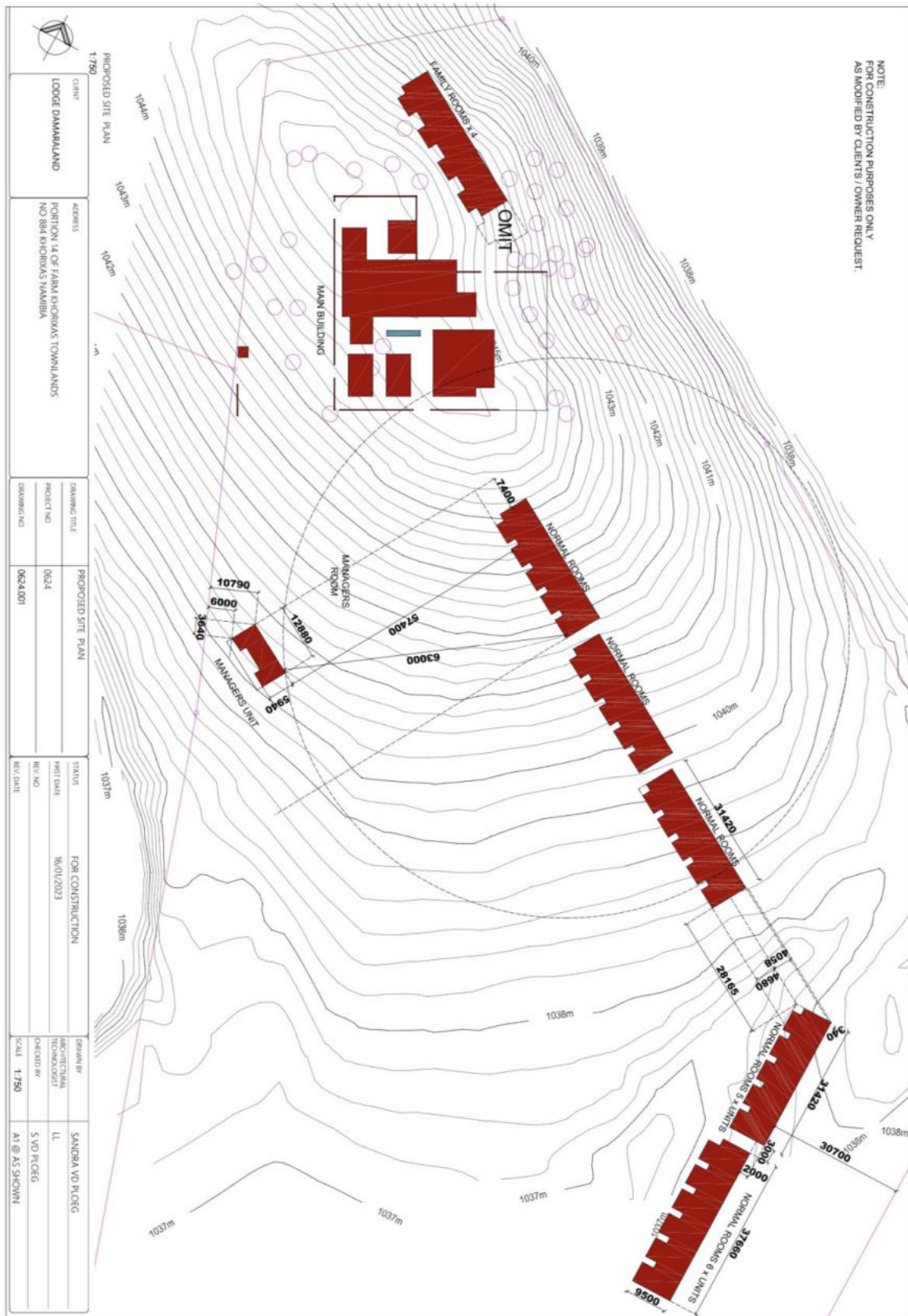
8 REFERENCES

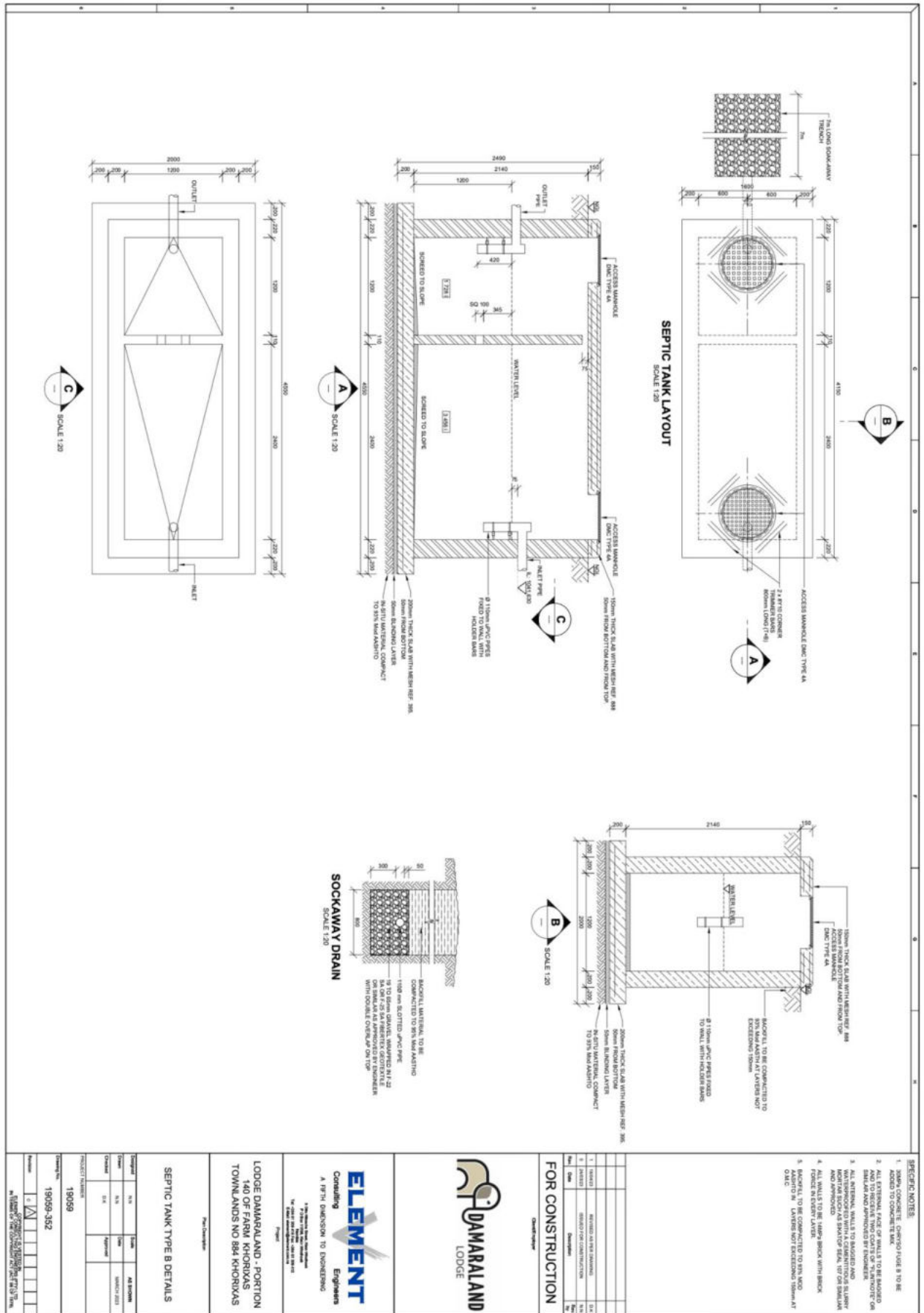
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APPENDIX A – SITE LAYOUT







Submitted to: Damaraland Lodge CC
Attention: Mr Danie van Wyk
P O Box 90909
Windhoek, Namibia

REPORT:

BACKGROUND INFORMATION DOCUMENT FOR THE EXISTING LODGE DAMARALAND, KUNENE REGION, NAMIBIA.

PROJECT NUMBER: ECC-141-475-BID-04-D

REPORT VERSION: REV 01

DATE: NOVEMBER 2023



TITLE AND APPROVAL PAGE

Project Name: Background information document for the existing Lodge
Damaraland, Kunene Region, Namibia.

Client Company Name: Damaraland Lodge CC

Client Name: Mr Danie van Wyk

Authors: Diaan Hoffman

Status of Report: Final for MEFT Submission

Project Number: ECC-141-475-BID-04-D

Date of issue: November 2023

ENVIRONMENTAL COMPLIANCE CONSULTANCY CONTACT DETAILS:

We welcome any enquiries regarding this document and its content. Please contact:



Environmental Compliance Consultancy
PO Box 91193, Klein Windhoek, Namibia
Tel: +264 81 669 7608
Email: info@eccenvironmental.com

DISCLAIMER

The report has been prepared by Environmental Compliance Consultancy (Pty) Ltd (ECC) (Reg. No. 2022/0593) on behalf of the Proponent. Authored by ECC employees with no material interest in the report's outcome, ECC maintains independence from the Proponent and has no financial interest in the Project apart from fair remuneration for professional fees. Payment of fees is not contingent on the report's results or any government decision. ECC members or employees are not, and do not intend to be, employed by the Proponent, nor do they hold any shareholding in the Project. Personal views expressed by the writer may not reflect ECC or its client's views. The environmental report's information is based on the best available data and professional judgment at the time of writing. However, please note that environmental conditions can change rapidly, and the accuracy, completeness, or currency of the information cannot be guaranteed.

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1 BACKGROUND INFORMATION DOCUMENT

1.1 PURPOSE OF THIS DOCUMENT

Environmental Compliance Consultancy (Pty) Ltd (ECC) has been contracted by Damaraland Lodge CC to develop an environmental management plan (EMP), for the tourism-related activities at the existing and operational Lodge Damaraland situated on Portion 14 of the farm Khorixas Townlands no 884, Kunene Region, Namibia. Consistent with the Environmental Management Act, 2007 and its regulations. An environmental clearance certificate application will be submitted to the Ministry of Environment, Forestry and Tourism (MEFT) for the Project, which is the relevant authority to make a Record of Decision (RoD) with regards to the Project.

For this project, ECC proposes to only develop a comprehensive environmental management plan (EMP) for the following reason Lodge Damaraland is situated in the Khorixas townland and is on a portion of land which is only 5.5 hectares in size. Small lodges by nature have limited environmental footprints and low potential for significant adverse impacts on their surroundings. Thus, subjecting them to a full-blown Environmental Impact Assessment (EIA) could be excessively resource intensive.

The purpose of this Background Information Document (BID) is to provide MEFT and the Interested and Affected Parties (I&APs) a background to the Project and to invite I&APs to register as part of the environmental and social impact assessment (ESIA) process.

All those who register as an I&AP will be kept informed throughout the process. Registration provides a platform for participants to submit comments, concerns, or recommendations regarding the Project. This BID includes the following information:

- The project and location
- Infrastructure on site
- How the application process works
- Next steps and the way forward

1.2 DESCRIPTION OF THE PROJECT

Lodge Damaraland has been fully built and is currently in operation. Its construction took place since the start of 2023, culminating in the opening of the lodge to tourism in August 2023. Situated adjacent to the D2625 district road on Portion 14 of farm Khorixas Townlands no 884 in the Kunene Region, Namibia. Lodge Damaraland is strategically positioned, in Damaraland (2.2 km from Khorixas) and near Etosha National Park as depicted in Figure 1.

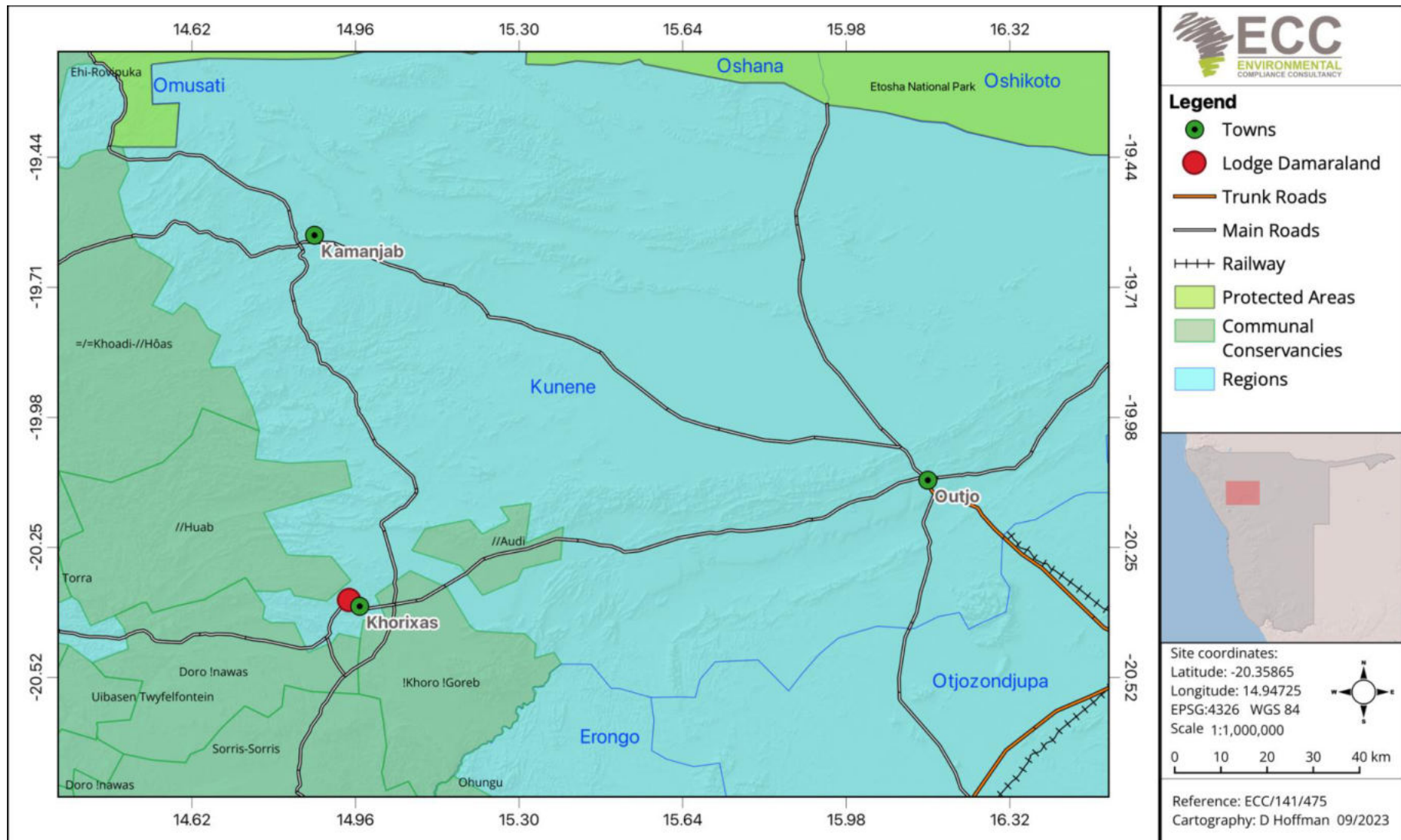


Figure 1 – Lodge Damaraland Locality Map

In terms of Section 32 (1) of the Environmental Management Act, No. 7 of 2007, ECC has determined that MEFT is the competent authority for the Project. The tourism-related activities trigger the listed activities as per the Environmental Management Act Regulations. The relevant activities list is provided later in the BID.

1.3 NEED FOR THE PROJECT

Namibia is a tourism destination for people around the world due to its various unique and popular geological features, wildlife attractions and popular sites across the country. The tourism industry is a major contributor to the Gross Domestic Product (GDP) of Namibia and plays an important part in socio-economic sustainability and wildlife conservation within the country.

There is a compelling need for tourism lodges like Lodge Damaraland in Namibia, particularly in the vicinity of Damaraland and Etosha National Park.

Lodges in Damaraland can contribute to sustainable tourism practices that benefit local communities, promote conservation efforts, and ensure the preservation of this pristine wilderness for future generations to enjoy.

1.4 OPERATIONAL PHASE

All infrastructure falls within the boundaries of portion 14 of the farm Khorixas Townlands no 884, which is 5.5 ha in size. The following infrastructure is on the project site:

- Main building with a restaurant,
- Swimming pool,
- 30 guest rooms, and
- 1 manager house.

The lodge has the capacity to house around 86 guests per day.

1.5 CONSIDERATION OF ALTERNATIVES

Best practice environmental assessment methodology calls for consideration and assessment of alternatives to a proposed project. In a project such as this one, it is not possible to identify an alternative site due to the lodge already being constructed and in operation since August 2023.

During the project, alternatives will take the form of consideration of optimisation and using eco-friendly solutions to reduce potential impacts. This will be addressed in the EMP for the Project.

2 THE ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT PROCESS

The ESIA for the Project is being conducted by ECC and will be undertaken in terms of the Environmental Management Act, 2007 and its regulations. The process followed for this ESIA is set out in the flowchart in Figure 2.

A final decision relating to the above-mentioned application will be made by the Ministry of Environment, Forestry and Tourism (MEFT), Department of Environmental Affairs (DEA).

For this Project, ECC proposes to only develop a comprehensive EMP, which will cover the following:

1. Screening phase (completed)
2. Evaluation of potential impacts and the drafting of an Environmental Management Plan (EMP) and submission to the appropriate competent authority.

The main objectives of the EMP will be to:

- a) Provide information describing the Project and associated activities; and
- b) Develop management and mitigation measures associated with any identified potential impacts where necessary.

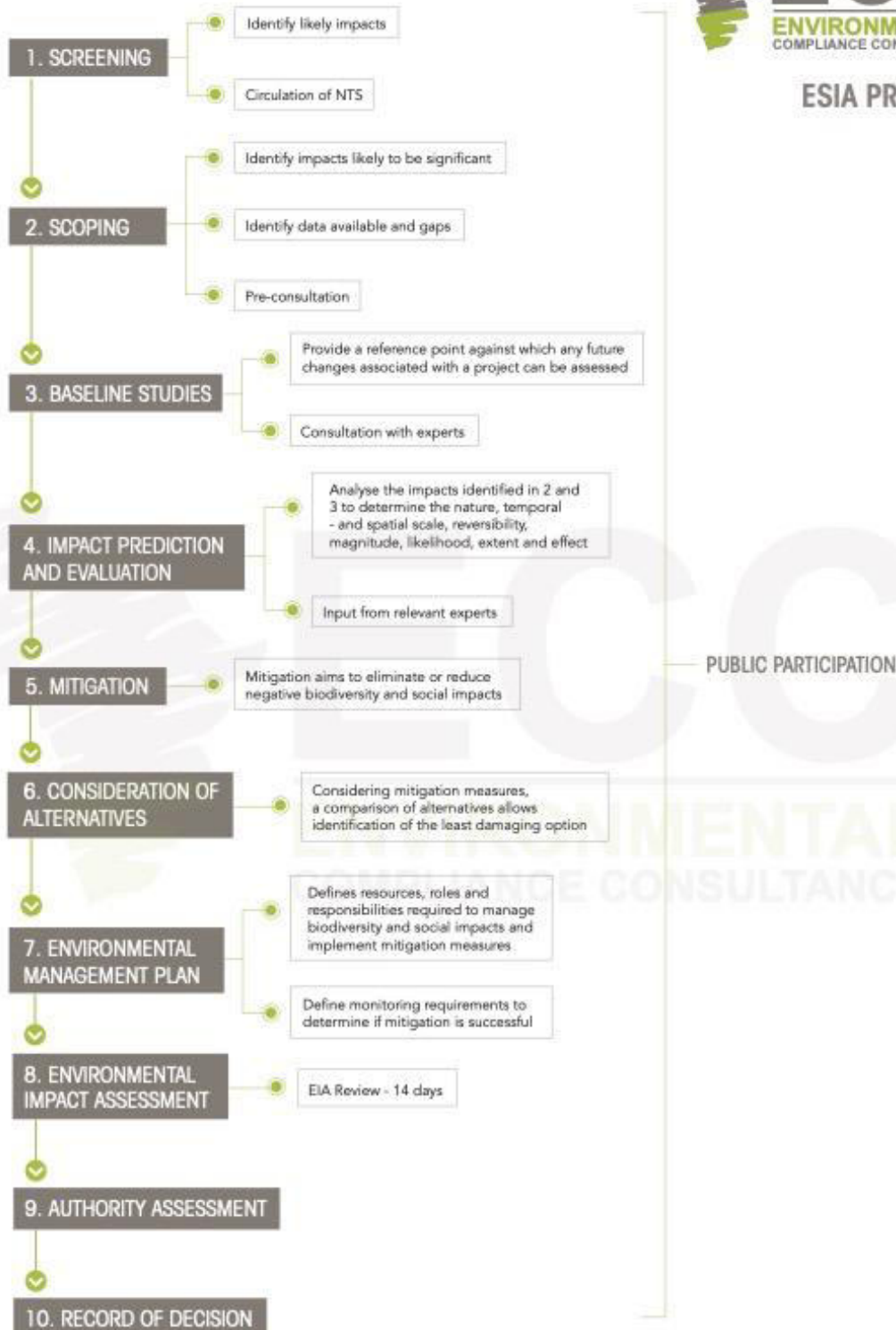


Figure 2 - Flowchart of the environmental and social assessment process

2.1 SCREENING

A review of the Project was undertaken and the screening findings against the listed activities were identified, the findings of which are summarised in Table 1.

Table 1- Listed activities triggered by the project

Listed activity	EIA screening finding
<p>Waste management, treatment, handling and disposal activities (2.3) The import, processing, use and recycling, temporary storage, transit or export of waste.</p>	<p>- This Project involves the temporary storage of general waste. Waste is collected by the Municipality and disposed of at the Municipal Landfill Site.</p>
<p>Tourism development activities (6.) The construction of resorts, lodges, hotels or other tourism and hospitality facilities.</p>	<p>- The following infrastructure has been constructed on site: Main building with Restaurant, swimming pool, 30 guest rooms and 1 manager house.</p>
<p>Water resource developments (8.1) The abstraction of ground or surface water for industrial or commercial purposes.</p>	<p>- There is one borehole on-site, which is unfit for human consumption which is used for the watering of indigenous tree species on-site.</p>
<p>Hazardous substance treatment, handling and storage (9.1) The manufacturing, storage, handling or processing of a hazardous substance defined in the Hazardous Substances Ordinance, 1974.</p>	<p>- A Septic tank system has been installed on-site and included the following: Septic tank with 2 tanks (3456 l and 1728 l) with a 7 m soak away trench on the 2nd tank outlet. 4 x Septic tanks on-site (same design, but 2 different sizes).</p>

Listed activity	EIA screening finding
<p>(9.2) Any process or activity which requires a permit, licence or other form of authorisation, or the modification of or changes to existing facilities for any process or activity which requires an amendment of an existing permit, licence or authorisation or which requires a new permit, licence or authorisation in terms of a law governing the generation or release of emissions, pollution, effluent or waste.</p>	
<p>Land use and development activities 5.3) Construction of veterinary protected area or game proof and international boundary fences.</p>	<ul style="list-style-type: none"> - A fence has been constructed around the lodge for security purposes.
<p>Other activities (11.2) Construction of cemeteries, camping, leisure and recreation sites.</p>	<ul style="list-style-type: none"> - The lodge does provide leisure and recreation activities.

2.2 STAKEHOLDER ENGAGEMENT

The neighbouring farmers will receive a letter notifying them of the intent to apply for an environmental clearance certificate and receive invitations to register as I&APs. a Period of time for input will be granted for the Environmental Assessment Practitioner (EAP) to receive any additional concerns or comments from registered I&AP's.

2.3 DRAFT ENVIRONMENTAL MANAGEMENT PLAN

An EMP shall be developed for the Project setting out auditable management actions for the Project to ensure careful and sustainable management measures are implemented for their activities in respect of the surrounding environment and community. The EMP becomes the legally binding commitment upon approval of the EMP and issuing of the environmental clearance certificate. Environmental clearance certificates are issued for a period of 3 years and renewal is subject to compliance with the provisions and conditions of the environmental clearance certificate.

3 THE WAY FORWARD – PUBLIC PARTICIPATION

Public participation is an important part of the ESIA process. It allows you, the public and stakeholders to raise concerns or provide valuable local environmental knowledge that can benefit the assessment process. At this phase, ECC will perform the following:

- Prepare and submit the application for the environmental clearance certificate in the prescribed manner
- Identify relevant key stakeholders, authorities, and municipalities hereafter referred to as I&APs
- Submit the EMP to the competent authority and Environmental Commissioner for a record of decision

Your request for registration as an I&AP as well as any comments on the BID or Project must be submitted in writing and can be emailed using the details in the contact us section below. Registration as an I&AP for the Project can be completed online on ECCs website on the Projects page, or by using this link: <https://eccenvironmental.com/download/the-operation-of-the-existing-lodge-damaraland-on-portion-14-of-the-farm-khorixas-townlands-no-884-kunene-region-namibia/>.

Registration as an I&AP should be submitted on or before **25 November 2023**.

We welcome any enquiries regarding this document and its content. Please contact:

Environmental Compliance Consultancy (ECC)

info@eccenvironmental.com

Tel: +264 816 697 608

www.eccenvironmental.com

At ECC we make sure all information is easily accessible to the public.

Follow our social platforms online to be kept up to date.

Environmental Compliance Consultancy (Pty) Ltd

PO Box 91103 Klein Windhoek Namibia

info@eccenvironmental.com

www.eccenvironmental.com

+264 81 669 7608



ECC-141-475-LET-06-D

15 November 2023

Dear Sir or Madam,

NOTIFICATION OF ENVIRONMENTAL ASSESSMENT FOR THE TOURISM-RELATED ACTIVITIES AT THE EXISTING AND OPERATIONAL LODGE DAMARALAND.

Environmental Compliance Consultancy (ECC) has been contracted by Damaraland Lodge CC, the Proponent, to develop an environmental management plan (EMP) and submit an Environmental Clearance Certificate application to the Ministry of Environment, Forestry, and Tourism (MEFT) in terms of the Environmental Management Act, No. 7 of 2007. This application is for the tourism-related activities at the existing and operational Lodge Damaraland on portion 14 of Farm Khorixas Townlands No 884 in the Kunene Region, Namibia.

This notification is intended to inform the neighbours and stakeholders about this Project. If you have any questions or concerns, please don't hesitate to reach out to us or register as an interested and affected party (I&APs) via the following link: <https://eccenvironmental.com/download/the-operation-of-the-existing-lodge-damaraland-on-portion-14-of-the-farm-khorixas-townlands-no-884-kunene-region-namibia/>.

We kindly request neighbouring farm/land owners and stakeholders to provide their contact information and sign this form to acknowledge receipt of this notification.

Owner or Lessee Name & surname: KHORIXAS Town Council

Farm Name & Number: EBEN E. XOAGUB

Cell phone number: 081 606 66686

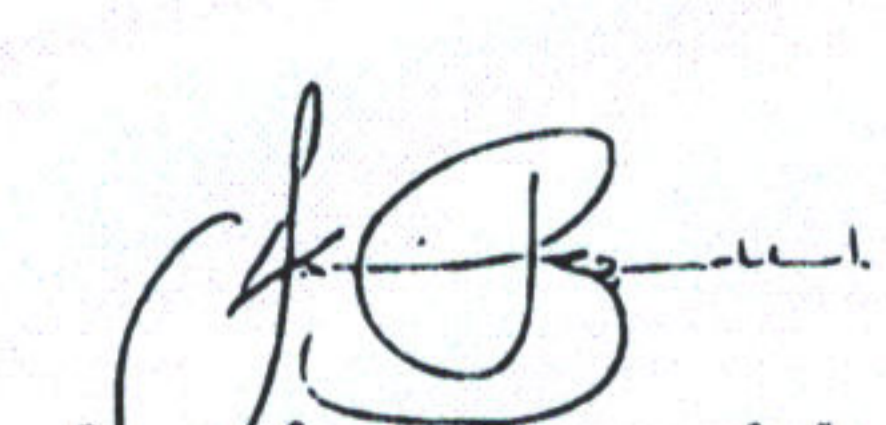
Email address: ebenxoagub@gmail.com

Signature: [Handwritten Signature]



Yours sincerely,


Stephan Bezuidenhout
stephan@eccenvironmental.com


Jessica Bezuidenhout Mooney
jessica@eccenvironmental.com



CURRICULUM VITAE

JACOBUS STEPHANUS BEZUIDENHOUT (Stephan)

B.Soc.Sci (Hons) in Environmental Management & Analysis

EAPAN Registration 172 | SAIE&ES Professional Member | NCE ExCo Member | FSC Member

PROFESSION SPECIALIZATION:

Environmental Assessment Practitioner and Consultant, with ten (10) years practical experience in ecology, conservation, and environmental impact assessments. Specializing in identifying and applying legislative requirements to proposed projects, as well as identifying impacts and mitigations for projects within different sectors, including mining, energy, agriculture, and construction.

EMPLOYMENT EXPERIENCE:

2016 to Present - Managing Director for Environmental Compliance Consultancy, Namibia:
Managing a dynamic team of environmental practitioners and graduates at Environmental Compliance Consultancy, with a core objective of improving the national standard of environmental compliance by developing local capacity. Successfully completed over 30 projects for various industries, including mining, energy, infrastructure, conservation, and tourism. Also part of the working group that drafted a National Standard for Forest Stewardship Council (FSC), allowing for a higher rate certification and improved compliance. Mentored over eight interns, building their careers in environmental management, conservation, and rangeland management.

2015 to 2016 (18 Months) - Environmental Practitioner for Savannah Environmental (Pty) LTD. South Africa:

Employed as a technical practitioner in the Northern Cape, South Africa, to ensure compliance with all relevant and required legislation, as well as to head up all new proposed development in the province for Savannah Environmental

2013-2015 (24 Months) - Environmental Coordinator and Manager, Worley Parsons Limited, based on-site in Mozambique, Africa. 375 km 26-inch natural gas installation for SASOL & ROMPCO Mozambique.

PERSONAL DETAILS:

Gender: Male

Age: 34

Marital Status: Married

Date of Birth: 11 April 1989

Citizenship: Namibian

ID Number: 89041100032

Contact Details: +264 81 262 7872, stephan@eccenvironmental.com

Driver's License: Code B & Certified Advanced Driver's License

Postal Address: PO Box 91193, Windhoek, Namibia, 9000

PROFESSIONAL SOCIETY AFFILIATIONS:

2018 - Current: Namibian Chamber of Environment Executive Committee Member (NCE)

2017 - Current: Forest Stewardship Council (FSC) Environmental Member (FSC 3182)

2016 - Current: South African Institute of Ecologists and Environmental Scientists (SAIE&ES)
Professional Member

2014 - Current: Environmental Assessment Practitioners Association of Namibia (EAPAN#172)

ACADEMIC BACKGROUND:

BSocSci Hons. in Environmental Management and Analysis (University of Pretoria 2012):

Postgraduate degree program consisting of lectured subjects and a research component.

Research Project: The impact of Acacia mellifera clearing on vegetation and soil properties in the central savannah of Namibia.

BA Development and Environment (Stellenbosch University 2008 – 2012):

Interdisciplinary undergraduate degree program, majoring in Geography, Environmental Science, Public and Development Management, and Project Management.

SECONDARY EDUCATION:

Graduated from St Paul's College High School (2007), Windhoek, Namibia.

PUBLICATIONS:

N.S., et al., Some ecological side-effects of chemical and physical bush clearing in a southern African rangeland ecosystem, Southern African Journal of Botany (2015), <http://dx.doi.org/10.1016/j.sajb.2015.07.012>

The FSC National Forest Stewardship Standard of Namibia (Draft V 4). Co-authored by S Bezuidenhout, P Cunningham, A Ashby, F Detering, W Enslin & D Honsbein.

Name of Consultant: Diaan Hoffman

Position / Profession: Junior Ecologist and
emerging Environmental Practitioner

Date of Birth: 19 May 1996

Nationality: Namibian

Professional Memberships: EAPAN No. 213

Email: diaan@eccenvironmental.com

Website: www.eccenvironmental.com

Contact: +264 81 467 4294

QUALIFICATIONS:

University of Stellenbosch: 2015 – 2018 BSc Conservation Ecology

PROFILE:

Highly accomplished professional with experience as an environmental consultant. An out-the-box thinker, passionate about high-quality service in fast-paced environments. Excellent planning and execution ability, able to lead and collaborate with teams to deliver beyond expectations.

KEY AREAS OF EXPERTISE:

Environmental (and social) Impact Assessments (EIAs) (ESIAs)	-	Compiling EIA Reports and EMPs Public Participation & Stakeholder Management
Conservation		Small mammal sampling and parasite analysis. In-depth knowledge of biodiversity and Ecology.
GIS Mapping		Responsible for GIS mapping

LANGUAGES:

	Read	Write	Speak
English	Excellent	Excellent	Excellent
Afrikaans	Excellent	Excellent	Excellent

SUMMARY OF EXPERIENCE AND CAPABILITY:

Since 2019, Diaan has been working as an environmental assessment practitioner. In 2021 he started working as a junior ecologist assisting with the rangeland management and the FSC standard in Namibia. Diaan has a good biodiversity and ecology background.

PROJECT EXPERIENCE

PROJECT	DATE	ROLE
ENAEX EIA: Assisting with application for Environmental Clearance Certificate (ECC)	2019 - 2020	Team member
Bulk Mining Explosives: Updating EMP and application for renewal of ECC.	2019-2020	Team member
Sand Miners Association: Assisting with the writing of the EIA, EMP and creating of Maps	2019 - 2020	Team member
Okapana (TOTAL) Service Station CC: Conducting and assisting with the whole EIA process.	2019 - 2020	Team member
Walvis Bay Salt Refiners: Measuring Environmental Noise and assisting with the report writing.	2019-2020	Team member
Jumbo Charcoal FSC Group Scheme management.	2021 - Present	Team member
Jumbo Charcoal: writing of EMP	2021	Team member
EMCON: Creating Maps and Baseline sections for ESIA	2021	Team member
Nexus Charcoal: Conducting and assisting with the whole ESIA process.	2021	Team member
Etosha Charcoal: writing of EMP	2021	Team member
FSC Mapping and rangeland management	2021- Present	Team member
GIS Mapping: Using QGIS to produce maps for various projects.	2021- Present	Team member
Uis Afrititn EPLs: Conducting and assisting with the whole ESIA process.	2021	Team member
Paratus ESIA: Conducting and assisting with the whole ESIA process.	2021	Team member
Gmundner ESIA: Conducting and assisting with the whole ESIA process.	2021 -2022	Team member
!Uris Amendment: Conducting and assisting with the Amendment	2021 -2022	Team member
Maxwell 13 MW Solar plant ESIA: Conducting and assisting with the whole ESIA process.	2021-2022	Team member
Retort Charcoal Amendment: Conducting and assisting with the Amendment	2022	Team member
Retort Charcoal Compliance reports	2022	Team member
InnoSun 36 MW Solar plant ESIA: Conducting and assisting with the whole ESIA process.	2022-2023	Team member
Yucca Exploration ESIA: Conducting and assisting with the whole ESIA process.	2022-2023	Team member
Osino Powerline assisting with the whole ESIA process.	2023	Team member
Quiver & Co: Lodge Damaraland and Toshari Lodge ECC applications	2023-Present	Team member
Shametu River Lodge ECC applications	2023-Present	Team member

CERTIFICATION:

I, the undersigned, certify that to the best of my knowledge and belief, these data correctly describe me, my qualifications, and experience.

DATE: 8/12/2023



Diaan Philip Hoffman