

UPDATED ENVIRONMENTAL MANAGEMENT PLAN (EMP)

**FOR THE EXISTING AND OPERATIONAL NKANSA RUPARA
RESTCAMP IN SANGWALI COMMUNAL AREA OF ZAMBEZI
REGION**



Assessed



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Title	Environmental Management Plan (EMP) for the existing and operational Nkansa Rupara Restcamp (Measuring 23.5 hectares)
Environmental Practitioner	Nyepez Consultancy cc
Reviewer	Mr. Erongo Consulting cc
Client	Wildest Logistics cc (Nkansa Rupara Restcamp)
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Definitions and abbreviations

DEA	Directorate of Environmental Affairs
ECC	Environmental Compliance Certificate
EIA	Environmental Impact Assessment
EMA	Environmental Management Act
EMP	Environmental Management Plan
I&APS	Interested and affected parties
MAWF	Ministry of Agriculture Water and Forestry
MEFT	Ministry of Environment, Forestry and Tourism

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1. INTRODUCTION

This document presents an amended and updated Environmental Management Plan (EMP) to manage the existing and operational Nkansa Rupara RestCamp, a Restcamp that operates within Sangwali Communal area along the Kwando River channels in the Zambezi Region. The total carrying capacity of the Kaza Safari Lodge is 20- 30 people per day. The size of the land parcel for the Restcamp is 23.5 hectares.

The proponent, Wildest Logistics cc are the developers and operators that manages and operates the Rurapa RestCamp within the Nkansa Rupara Conservancy in Sangwali Communal area. The Restcamp is located on the banks of one of the many channels of the Kwando-Linyanti River system on the southern boundary of the Wuparo Conservancy. It is 3km north of the Nkasa Rupara National Park entrance, 10km south of the village of Sangwali in the Zambezi region of Namibia

The proponent Wildest Logistics cc is obliged by the competent authority to seek to acquire an environmental clearance certificate for compliance of the existing and operations of the Restcamp against the environment its operating. The Restcamp requires a ECC that is based on business principle of an eco-tourism and conservation of environment. Given the need and requirements of the needed clearance certificate, and in order to ensure compliance to the Environmental Management Act of 2007, the proponent is obliged to apply for a Clearance certificate that informs the general public and operating management of the existing Restcamp operations activities and mitigation measures put in place to ensure sustainability and effective environmental protection of the tourism Restcamp.

Thus, any minor changes in the operation of the Restcamp have and will not change the scope of the physical environment, the physical characteristics of the project area, no change in the extent or size of portion where the first scoping study of Restcamp was conducted and the subsequent approval of the environmental clearance certificate. It is therefore required as per the Environmental Act no. 7 of 2007 that an updated Environmental Management Plan detailing such changes in project activities be compiled and submitted to the environmental commissioner for approval.

1.1 OPERATIONAL ACTIVITIES & OPERATION OPDEL

The operations of the Restcamp create approximately 10 to 15 full time jobs plus several indirect casual jobs. The Proponent hires local Namibians from the Sangwali and surrounding areas to access job opportunities through an established employment farmwork. The objectives of this employment and skills development framework are to: enhance employment opportunities for the locals and to adhere to employment targets and agreements, to formulate plans for the development of skills of local employees, and develop a framework for regulating Social Responsibility efforts, assistance programs, donation and community welfare efforts.

In addition, concession(s) and structured agreement between Rupara restcamp (Wildest Logistics cc) and the Sangwali Community and came into effect on January 2017. The agreement allows the Wildest Logistics cc to operate the restcamp within the Nkasa rupara conservancy area in conjunction with local community. In doing so, this increase community benefits and improve community-operators' relations. Regular communications between the restcamp operators, restcamp Manager, Wildest Logistics cc Environmental Officer and the conservancy is often undertaken and any communications, including complaints from the conservancy are usually recorded and addressed collectively with the involved development stakeholders.

1.2 AVAILABLE RESTCAMP UTILITY SERVICES

The Nkansa Rupara Restcamp tourism facility comprises of the following project activities and services.

- Restcamp has 23 newly renovated self-catering tents with ensuite bathroom and 7 Camping sites facing the Harubandi channel. The Rest Camp has a fire place and water tap at each site. The sites share 2 new ablution blocks with hot water provided by a wood-burning donkey. Fresh water and 12v lights are provided.
- The self-catering units consist of 3 fully equipped double chalets, and 1 family chalet (sleeps 2+3) with private ablutions, fresh water and 12v lights from solar panels.
- The restcamp have x2 open boats for safari and game viewing purpose with no over-nighting facilities on the boats
- Communal Bathrooms and Braai Place

- Borehole Water is used
- Wood and Icepacks can be purchased at the Nkansa lodge
- Payment Rate: N\$220 pp

According to the proponent, the existing and operational Nkansa Rupara Restcamp tourism business is serving as a precious, modest tourism resting area to suit the local and international level, which is boosting the local socio-economic, promote and improve surrounding property values and land uses alongside the Sangwali area and Kwando riverbanks and has brought competitive employment creation, promote the beautiful scenery, aesthetics of Sangwali communal area and communities.

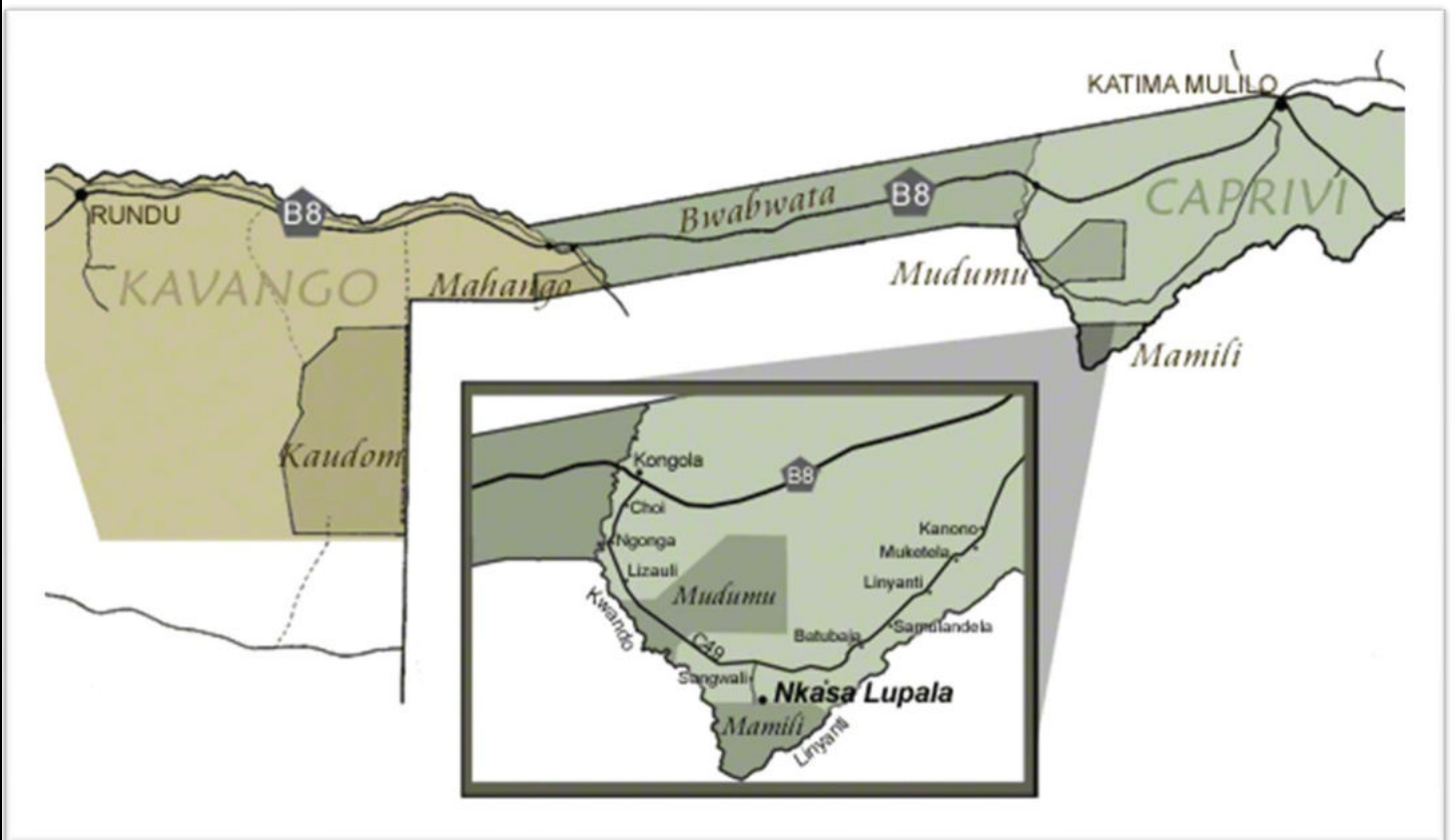


Figure 1: Regional map & Restcamp locality site map

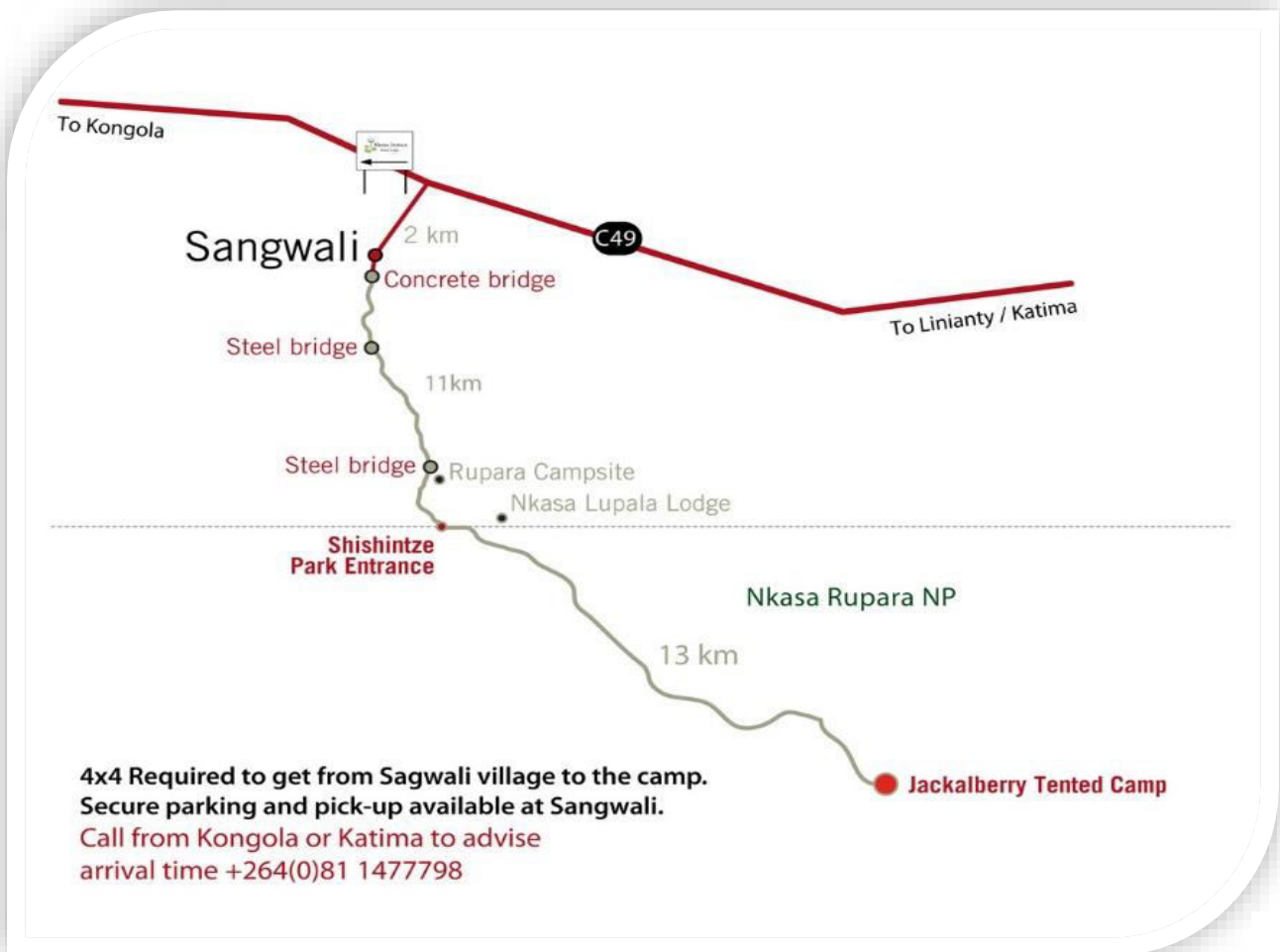


Figure 2: Nkansa Rupara Restcamp Locality map

According to the Namibian environmental legislation (Environmental Management Act (No. 7 of 2007) (EMA) and the EIA Regulations (GN. No. 30 of 2012), an Environmental Management Plan (EMP) is required to obtain an Environmental Clearance Certificate (ECC) from the Ministry of Environment, Forestry and Tourism (MET) for this business operation to continue.

NYEPEZ Consultants (NC) has been appointed to draft an updated and/or amended EMP as part of the application to acquire a valid ECC. This updated EMP is to be implemented to mitigate the potential impacts of the Restcamp development and business operations. The contents of this updated EMP will be binding on all parties who will have a role to play in the Site operations as stipulated in the report and will be liable for the rehabilitation measures recommended in last section of this report.

1.3 PURPOSE THE EMP

The aim of an updated EMP is to ensure that the activities of this particular existing and operational business development are conducted as per the requirements of the Namibian Environmental Management Act (No. 7 of 2007) and EIA regulations of 2012. The updated EMP provides and explains a clear guideline on how the daily activities should be conducted and also provides a monitoring framework to ensure compliance against the recommended mitigation measures to avert any possible negative impacts.

Furthermore, other purpose of this updated EMP is to provide a management framework for the planning and implementation of the operations of the Restcamp and provide standards and operating arrangements so that potential environmental and social impacts of the Restcamp are mitigated, prevented and minimized as far as reasonably practicable, and that statutory requirements and other legal obligations are fulfilled.

This updated EMP also presents protocols and procedures, and roles and responsibilities to ensure the management arrangements are appropriately and effectively implemented. This EMP is a live document and shall be reviewed at predetermined intervals, and/or updated when the scope of works alters, or when further data / information can be added. All personnel working on the project will be legally required to comply with the standards set out in this EMP. The 2012 EIA Regulations defines a 'management plan' as: "...a plan that describes how activities that may have significant environments effects on the environment are to be mitigated controlled and monitored.

1.3.1 EMP Requirements

EMP requirements as outlined in the below Sections of this EMP explains the EMP requirement of the draft management plan, which includes

(aa) information on any proposed management, mitigation, protection or remedial measures to be undertaken to address the effects on the environment that have been identified including objectives in respect of the rehabilitation of the environment and closure;

(bb) as far as is reasonably practicable, measures to rehabilitate the environment affected by the undertaking of the activity or specified activity to its natural or predetermined state or to a land use which conforms to the generally accepted principle of sustainable development; and

(cc) a description of the manner in which the applicant intends to modify, remedy, control or stop any action, activity or process which causes pollution or environmental degradation remedy the cause of pollution or degradation and migration of pollutants.

1.3.2 Compliance to the EMP

Content of this updated EMP is tailored in accordance with the prevailing EMA Act and the EIA Regulations. The aim is to provide appropriate management measures that would address the identified impacts that the project could bring about as stipulated in the Restcamp development specifications. The remedial and mitigation measures recommended for rehabilitation remain binding to all staffs and all employees. Adherence to the specifications identified herein is highly recommended throughout the lifespan of the facility.

It should be noted that the updated and amended EMP shall not only be limited to the facility operations, but it encompasses the bigger picture. The document serves as the guiding tool to protecting the overall natural, bio-physical and socio-economic environment at large.

1.3.3 Proponent responsibility to the EMP

As the proponent, Wildest Logistics cc shall assume overall responsibility and implementation of the updated EMP. The Restcamp tourism facility Manager holds the mandate and sole responsibility of managing the daily operations and shall ensure that any other person (e.g., Casual Workers) is conversant with the contents of the EMP and adhere to the requirements. The following environmental sensitive conditions as outlined the ECC certificate have been obeyed and complied to;

- That the proponent **Wildest Logistics cc** have not and does not intend to dispose any waste waters affluents in both in the National Park, conservancy area and on the Kwando River bank channels. The Restcamp have well designed and connect septic tank where all affluent liquid wastes are channeled.
- That both the Sangwali Community and Conservancy entities are fully involved in the monitoring and overseeing that no Restcamp activities operating within the Nkasa Rupara Conservancy or in Mamili National Park and Kwando River disposes waste water affluent in the rivers. This empowers the conservancies and community members to give them full responsibility of protecting the river and the environment

- Nkansa Rupara Restcamp operators has ensured that the most sensitive and key biodiversity habitats along the river and within the rivers and surrounding wetland areas remain protected. A copy of the updated EMP shall be kept at the Site premises and induction sensitization workshops are often conducted with all new employees prior to commencement of their responsibilities.

1.3.4 Possible adjustment to the EMP

The EMP should be considered as an open-ended document that can be updated or amended subject to new information. This EMP represent an amended and updated version of the existing Nkansa Rupara Restcamp operational activities. This allow for adjustments in the document as new information is made available and new mitigation where unforeseen environmental impacts arise.

1.3.5 Legal Framework that area relevant to the EMP

In addition to the EMA and the Environmental Assessment Policy, Namibia has a host of legal and policy documents and guidelines that govern environmental management as indicated in Table 1 below. Wildest Logistics cc has the responsibility to ensure that NO restricted Restcamp activities will be conducted and will be carried out during any preparation, construction and operation phase of the existing and operational Restcamp development.

Table 1: Relevant legislation and the applicability

Legislation considered	Aspect of Project
Regional Councils Act, 1992 (Act No. 22 of 1992)	The Regional Councils Act legislates the establishment of Regional Councils that are responsible for the planning and coordination of regional policies and development. The main objective of this Act is to initiate, supervise, manage and evaluate development in respective regions. Zambezi Regional Council is an I&AP to this project and they have No objection to the proposed project proposal. Rights shall be reserved to them should they wish to review the EMP.
Water Resources Management Act (Act No. 11 of 2013)	This Act provides a framework for managing water resources based on the principles of integrated water resources management. It provides for the management, development, protection,

	conservation, and use of water resources. Furthermore, any watercourse on/or in proximity to the site and associated ecosystems should be protected in alignment with the listed principles. Construction activities pose danger to surface and underground water resources through the inappropriate use of fuels and lubricants. The proponent shall ensure adequate handling of hazardous substances that could pollute water sources.
Pollution Control and Waste Management Bill (in preparation)	This Bill serves to regulate and prevent the discharge of pollutants to air and water as well as providing for general waste management. The Bill will repeal the Atmospheric Pollution Prevention Ordinance (11 of 1976) (below) when it comes into force. The Bill also provides for noise, dust or odour control that may be considered a nuisance. The Bill would repeal the Atmospheric Pollution Prevention Ordinance (11 of 1976) (below) when it comes into force. Furthermore, the Bill advocates for duty of care with respect to waste management affecting humans and the environment and calls for a waste management licence for any activity relating to waste or hazardous waste management.
Atmospheric Pollution Prevention Ordinance (Act No.11 of 1976)	This Ordinance serves to control air pollution from point sources, but it does not consider ambient air quality. Any person carrying out a ‘scheduled process’ which are processes resulting in noxious or offensive gases typically pertaining to point source emissions have to obtain a registration certificate from the Department of Health Although we do not anticipate the mining activities to generate excessive dust particles, the proponent should implement the necessary mitigation measures to limit dust emissions to air.
Public Health Act (Act No. 36 of 1919)	The Act serves to protect the public from nuisance and states that no person shall cause a nuisance or shall suffer to exist on any land or premises owned or occupied by him or of which he is in charge any nuisance or other condition liable to be injurious or dangerous to health. The proponent should ensure that the site workers are provided with protective gear to safeguard their wellbeing. The activities should also be conducted in a manner that does not pose any danger to the public and that any emissions which could be considered a nuisance remain at acceptable levels.
Labour Act (Act No. 6 of 2007)	The 1997 Regulations relating to the Health and Safety of

	employees at work sets out the duties of the employer, welfare and facilities at the workplace, safety of machinery, hazardous substances, physical hazards, medical provisions, construction safety and electrical safety. Specifically, no employer shall require or permit an employee to work in an environment that is deemed unfit without protective measures in place. The proponent as the employer should adhere with all the requirements of the Act and the associated Regulations.
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2.PROJECT DESCRIPTION

2.1 Project Locality

The Rupara Restcamp under the auspices of (Wildest Logistics cc) is situated within the Sangwali Communal Area of Zambezi Region, under Mayeyi traditional Authority. It is about 23.5 hectares. Located on the banks of one of the many channels of the Kwando-Linyanti River system on the southern boundary of the Wuparo Conservancy. It is 3km north of the Nkasa Rupara National Park entrance, 10km south of the village of Sangwali in the Zambezi region of Namibia

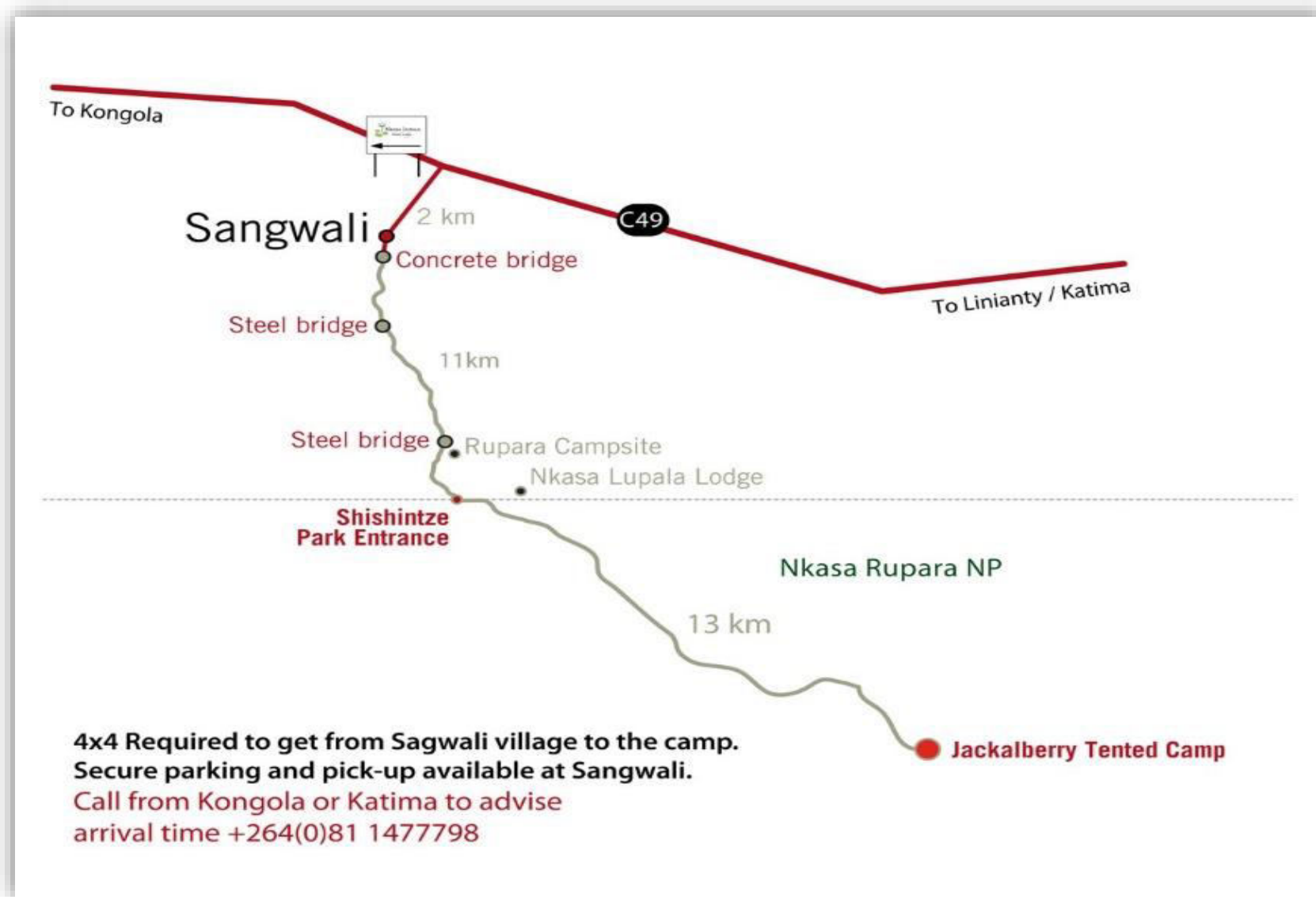


Figure 3: Location of Nkansa Rupara Restcamp

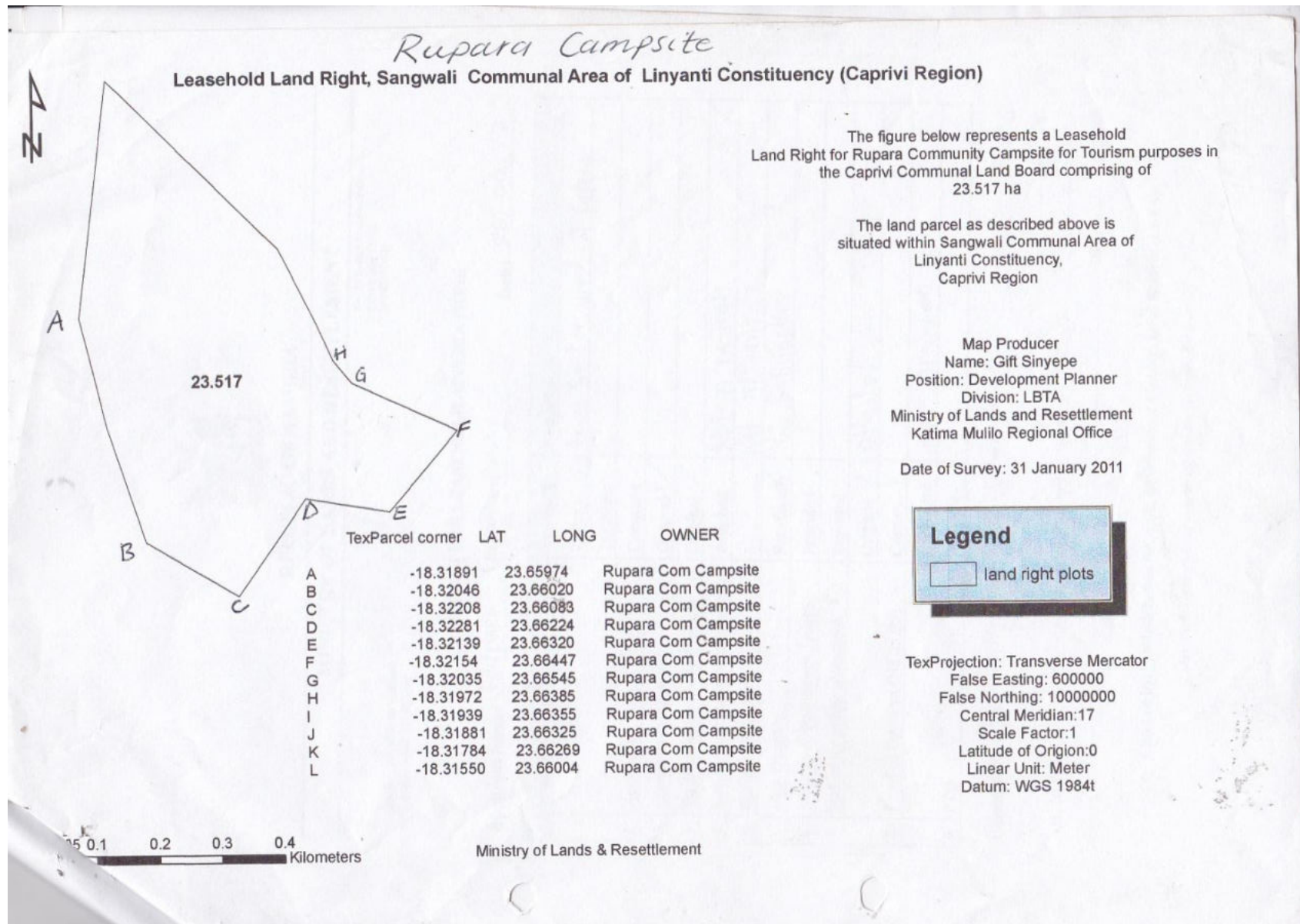


Figure 4: Restcamp site area & project area coordinates

2.2 Restcamp Project development

Wildest Logistics cc (The proponent) hold the accountability of the Restcamp and its operational activities and is therefore responsible for the implementation and management of this EMP. As the operations of the Restcamp continue to operate, the EMP shall be reviewed by the Restcamp Manager, and shall be amended and updated as required and approved ready for implementation. The implementation and management of this updated EMP and the monitoring of compliance shall continue to be undertaken through daily duties and activities and monthly inspections. The existing operational Restcamp tourism business activities include the following;

- Outdoor - indoor Kitchen & Outdoor viewing desks
- Small boat cruises for safaris and game viewing.
- Dining area
- Bathrooms & ten (10) sleeping rooms
- Small Administration office



Figure 5: Nkansa Rupara Restcamp (structural development & facilities)



Figure 6: Nkansa Rupara Restcamp development facility landscape & layout design

The proponent Wildest Logistics cc is responsible for:

- Ensuring all members of the Project Team, including contractors and consultants 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, and
- Ensuring that any persons allocated specific environmental responsibilities are notified of their appointment and confirm that their responsibilities are clearly understood.

2.3 Employment and Skills Development

The Proponent (Wildest Logistics cc) hires and have hired local residents (Namibians) from Sangwali communal area and other surrounding villages as a way of empowering and uplifting local residents' livelihood by through provision of jobs. The main objectives of this Employment and Skills Development Plan are to:

- Clarify employment and recruitment procedures of local community members
- Clarify and adhere to Employment targets
- Formulate plans for the development of skills of local employees, and
- Develop a framework for regulating Social Responsibility efforts, assistance programs, donation and community welfare efforts

3. PROJECT ACTIVITIES ASSESSMENT CRITERIA

According to Pastakia (1998) the Rapid Environmental Assessment method can be used to assess projects related to the guesthouse development project and Pastakia's method will be used during the assessment. The ranking formulas area calculated as follows;

$$A=A1 \times A2$$

$$B=B1 +B2+B3$$

$$\text{Environmental Classification (ES)} =A \times B$$

Table 5: Environmental Classification of Impacts according the Rapid Impact Assessment Method of Pastakia 1998

Environmental Classification (ES)	Class Value	Description of Class
108 to 72	5	Major positive change/impact
71 to 36	4	Significant positive change/impact

35 to 19	3	Moderate positive change/impact
10 to 18	2	Positive change/impact
1 to 9	1	Slight positive change/impact
0	0	No change/status quo/not applicable
-1 to -9	-1	Slight negative change/impact
-10 to -18	-2	Negative change/impact
-19 to -35	-3	Moderate negative change/impact
-36 to -71	-4	Significant negative change/impact
-72 to -108	-5	Major negative change/impact

The EMP will have specific targets for each year that will be evaluated by the annual Environmental audit. The audit can make recommendations which will necessitate Changes in the EMP. The EMP will be reviewed on an ongoing basis as new environmental challenges arise or targets/objectives are achieved. The Operations Manager will ensure that this review occurs in a timely manner.

Criteria	Score
Importance of condition (A1) –Assessed against the spatial boundaries of human interest it will affect	
important to national/international interests	4
important to regional/national interests	3
important to areas immediately outside the local condition	2
important only to the local condition	1
No importance.	0
Magnitude of changes /effects (A2) –measure of scale in terms of benefits of an impact or condition	
Major positive benefits	3
Significant improvement in the status quo	2
Improvement in status quo	1
No change in status quo	0
Negative change in the status quo	-1
Significant negative disbelief or change	-2
Major disbelief or change	-3
Permanence (B1) –defines whether the condition is permanent or temporary	
No change/not applicable	1
Reversible	2
Permanent	3

Cumulative (B3) –reflects whether the effects will be a single direct impact or will include cumulative impacts over time, or synergistic effect with other conditions. It is a means of judging the sustainability of the condition-not to be confused with the permanence criterion

Light or No cumulative Character /Not applicable	1
Modern Cumulative character	2
Strong Cumulative character	3

Summary of expected operational phase impacts prior to mitigation

BE=Biological/Ecological EO=Economical/Operational PC=Physical/ Chemical SC= Sociological/Cultural

Impact Category	Impact Type	Class Value
BE	Waste pollution	-1
BE	Ecosystem and Biodiversity impact	-1
EO	Fire	-2
PC	Groundwater, surface water and soil contamination	-1
SC	Skills, Technology and development	2
SC	Employment	2
SC	Cumulative	-2

4. ENVIRONMENTAL MANAGEMENT PLAN

An EMP is a tool used to take pro-active action by addressing potential problems before they occur. This should limit the corrective measure needed. The Environmental Management Plan (EMP) provides management options to ensure impacts of the Sun Hotel development project operations are minimized. The EMP acts as a stand-alone document, which can be used during the various phases (operational and decommissioning) of the guesthouse project. All personnel taking part in the operation of the guesthouse project should be made aware of the contents of the EMP, so as to plan the relevant activities accordingly in an environmental suitable way.

4.1. Objectives And Targets

Environmental objectives for the operations of the Restcamp are as follows:

- Zero pollution incidents
- Minimize waste sent to landfill or being burnt
- Protect local flora and fauna and minimize disruption

- Minimize light and noise pollution, and
- Use natural resources effectively and efficiently.

Procedures for monitoring processes against the project environmental objectives will be agreed with the Environmental officer

4.2. Safari Boat Safety Information

Small sized safari boats safety management plan will be developed and implemented in accordance with the specifications of the Restcamp and passenger water vessels in Namibia. The rest camp has Safari viewing map developed that serve as guide and directs the boats and tour guides during river and wildlife navigations and points of interest along the river. The map also contains useful boating information as well as an index and GPS reference.

4.3 Infrastructure

Restcamp has 23 newly renovated self-catering tents with ensuite bathroom and 7 Camping sites facing the Harubandi channel. The Rest Camp has a fire place and water tap at each site. The sites share 2 new ablution blocks with hot water provided by a wood-burning donkey. Fresh water and 12v lights are provided.

As a result, no changes or amendment in terms of current existing and operational Restcamp structural design, infrastructure upgrading or infrastructure development is required. Hence all infrastructural services remain the same. The Self-catering units fully equipped will consist of 2 double chalets. Private ablution (Hot water (wood donkey) and 12v lights will be provided).

4.4 Pollution Control & Mitigations

4.4.1 Handling of Fuel, Oil and Chemicals

The Restcamp facility Manager takes all reasonable precautions to prevent fuel, oil and chemical whilst undertaking works on site. To this end, the Site Manager ensures that:

- All necessary approvals are in place prior to bringing fuel, oil or chemicals to the Restcamp
- All fuel, oil and chemical deliveries (if any) shall be supervised by a responsible person, who shall be trained to deal with any spills
- Regular checks are performed to verify that no leaking or defective equipment, and
- Equipment is maintained regularly to ensure that no fuel, oil or hydraulic leaks occur.

The Restcamp Manager often ensures that there is sufficient absorbent material and spill & safety kits available on site to manage accidental spills. The location of and instructions on how to use this equipment is included in the included in the guest Induction booklet. Nominated Restcamp personnel are appropriately trained to use spill kits. Any accidental spillages of fuels and oils, or other hazardous substances, are usually cleaned up immediately and be reported Restcamp Manager and Environmental Officer. The following responses shall be undertaken:

Minor spill: Only diesel and oil, with no human injury, contamination to water bodies or other environmental receptors. Contain and clean up the spill using available spill kit. The Restcamp Manager shall inform the PM and Environmental Officer, supplying the following information:

- Date, time, and location
- Substance spilled and quantity, and
- Actions taken, and any future remediation required.

Major Spill: Resulting in human injury or/and environmental contamination and water body contamination. Personnel will contain the spill if possible and report the spill to the Restcamp Manager, who shall then alert the appropriate emergency services and the Environment Officer. In addition to the above information for a minor spill, the Restcamp Manager is also informed of any immediate dangers, e.g., fire, explosion, release of chemical fumes.

4.4.2 Sewerage and Greywater

The Restcamp have a well-maintained septic system that is completely closed, is a liquid waste management system to ensures that no solid waste or untreated sewage is discharged into the river. The RestCamp has no accommodation *houseboats* that caters for guest; thus, no water is released into the river from the boats. The existing onshore septic tank system is designed to service up to +- 13,000 liters of sewerage per day, before discharging the effluent through sprinklers.

4.4.3 General Waste

The Restcamp area is equipped with designated rubbish bins to ensure that all domestic waste is collected and disposed of sustainably through the existing waste management

arrangements. Waste separation continue to be practiced, to ensure that all recyclable material is collected and sent for recycling. It is recommended that the Restcamp produce a Waste Management Plan. The EMA (2007), Section 3, paragraph (i) states that waste must be reduced, re-used and recycled where possible, therefore in accordance with the Act, waste generated as a result of operating the restcamp is often managed and dealt with in accordance with a Waste Management Plan. This Plan was produced prior to operations of the restcamp commencing and included the following information:

- Describe each waste type expected to be produced
- Estimate the quantity of each waste type
- Identify the waste management action proposed for each waste stream, including re-using, recycling, recovery and disposal
- Designated areas to collect and separate waste, and
- Identify waste carrier and waste disposal company.

The Waste Management Plan was and is updated on a regular basis to ensure all waste and disposal route are identified. The aim of the Waste Management Plan is to achieve sustainable waste management. Their main purpose is to outline waste streams and identify the best treatment and disposal option for each one, applying the waste management hierarchy and avoiding as much waste as possible ending up at landfill or being burnt. In addition, it will also outline any potential economical and investment requirements for the treatment and / or disposal of waste.

4.4.4 Environmental Monitoring

Monitoring during operations is and shall be undertaken to ensure the effects on society and the environment are minimized, and to evaluate how effective the environmental management has been, over an extended period of time. The Restcamp Manager will set out monitoring arrangements prior to the operations of the restcamp.

5. ROLE PLAYERS & RESPONSIBILITIES

This section outlines the roles and responsibilities of the respective key personnel that would be responsible for effective implementation of the EMP.

5.1 Roles and responsibilities

Assigning responsibilities is necessary to ensure that key procedures are followed. The overall responsibility to ensure that the EMP is implemented rests with the Site Restcamp Manager, who shall appoint a team of workers to undertake the actual work.

The Key role-players for the project implementation are:

- a) An Environmental Compliance Officer (ECO) representing MET for environmental auditing and monitoring;
- b) The Site Restcamp Manager (or assigned representation by Wildest Logistics cc)

All instructions and official communications regarding environmental matters shall follow the organizational structure as determined by Wildest Logistics cc. The only exception to this rule would be in an emergency (defined as a situation requiring immediate action and where failure to intervene timeously would, result in unacceptable environmental degradation), where instructions may be given directly to any other Site personnel.

Project development Restcamp Manager:

The Restcamp Site Manager is and will be responsible for the overall daily operations at the restcamp facility and shall be responsible to adherence to the EMP throughout the project span. All team members shall be well-versed with the contents of this document.

The following are some **key responsibilities**;

- Ensure that the works on-site (restcamp) are conducted in an environmentally sensitive manner and in accordance with the requirements of the EMP at all times. Special care shall be taken to prevent irreversible damage to the environment.
- Ensure that all site restcamp staff are adequately informed of the requirements of the EMP pertaining to their site role, and that they have attended an environmental induction session (this session was and will be in the form of a talk and/or a written code of conduct that is clearly explained and understood by the team).

The Environmental Compliance Officer: ECO

The ECO in the context of this document refers to the party responsible for the environmental compliance and auditing activities required by the EMP for the lifecycle of the Site. The ECO shall be an independent environmental manager. The ECO shall have adequate

environmental knowledge to understand the detailed environmental issues associated with the project, and is to be well versed in the contents of the EMP:

- The ECO shall undertake all monitoring and auditing activities to ensure compliance with the EMP.
- The ECO shall inspect the site at any suitable time during operation of the restcamp
- The ECO shall compile progress reports following any site inspections, Compliance Reports following any non-compliance, and a Closure report following the conclusion of restcamp activities.
- The ECO shall liaise closely with the Restcamp site Manager and shall provide guidance on any environmental management issues, incidents or emergencies that are brought to their attention.
- The ECO shall assist in providing recommendations for remedial action in the event of any non-compliances.

5.2 Compliance with Requirements

Environmental management is not only concerned with the impacts on the environment, but also with how such operations are carried out. Tolerance with respect to environmental matters applies not only to the finished product but also to the standard of the day-to-day operations as well as the wellbeing of the immediate communities

The development of an updated EMP for a project is therefore an important and necessary task that is aimed at assigning responsibilities and mitigation options to a variety of activities. However, it can also be an ineffective tool in the absence of auditing or monitoring activities. Auditing or monitoring activities involve the structured observation, measurement, and evaluation of environmental data over a period of time.

5.3 Disciplinary Action

The EMP is a legally binding document. Non-compliance with the EMP shall result in disciplinary action being taken against the perpetrator/s. Such action may take the form of (but is not limited to) financial penalties, legal action, fines and/or suspension of work. The disciplinary action shall be determined according to the nature of the non-compliance or crime, and exact penalties are to the discretion of MEFT (Ministry of Environment, Forest and Tourism) according to the severity of the incident. Measures to be implemented by Wildest Logistics cc with assistance of monitoring by the ECO are outlined in the table below.

ASSESSMENT OF ENVIRONMENTAL ASPECTS AND PROPOSED MITIGATION MEASURES TO BE PERFORMED BY THE CONTRACTOR AND PROPONENT DURING ALL PHASES OF THE PROJECT (WILDEST LOGISTICS CC)

An environmental review for the operations of the Restcamp is and/or has been completed to identify all the commitments and agreements made within the EIA report. 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.

ACTIVITY	RISKS AND POTENTIAL IMPACTS	MANAGEMENT / MITIGATION MEASURES	MONITORING REQUIREMENTS	FREQUENCY	RESPONSIBILITY
Refueling tender boat and Restcamp generator	Spillages of fuel, oil and lubricants.	Use of solar panel power supply. Activity to be undertaken by a suitably qualified person. Spill kits available Use of dips trays during the transfer	Monitor fuel use	Daily	Restcamp Manager Personnel
Operations of mechanical equipment and engines	Spillages of fuel, oil and lubricants.	Undertake regular checks of all plant and equipment Service plant and equipment annually Spill kits available Clear spills immediately	Daily checks Monthly inspections / compliance checks	Daily Monthly	Restcamp Manager Personnel
Increased tourists to the area and taking part in activities – use of generators, engines and general noise sources	Increase noise levels	Boat engine and moving components are to be kept in good working order at all times to avoid capsizing and to minimize noise impact Guests are to be provided awareness on interactions and impacts on aquatic ecology No loud music Careful siting of generators Turn off engines when not required No idling	Daily checks Monthly inspections / compliance checks	Daily Monthly	Restcamp Manager Personnel
Increased tourists to the area and taking part in activities / Safari boat in close proximity to animals	Human-wildlife conflicts – animal injury, disturbance or mortality	Train personnel and guides Provide environmental awareness to guests' No-go areas on the river Limit the number of tender boats on the river at any one time Prevent killing of animals No stopping	Monthly checks of environment	Monthly	Restcamp Manager or Environmental Officer

		on the river unless approved by the Environmental Officer			
Abstraction of water from the river	Disturbance to the natural environment and use of resources	Use of borehole water for human consumption instead of river water. Train personnel and environmental awareness - minimize use of water Inform guests of water usage and consumptions issues / use water wisely Maintenance of plant and equipment – no leaks	Test water annually to ensure it is appropriate for consumption	Annual	Restcamp Manager or Environmental Officer
Sewerage production and disposal	Contamination of water resources. Reduction in water quality Flora and fauna affected	Septic tank Sewerage waste absorption system onsite or on the restcamp site.	The septic tanks must be designed to give a minimum of 24 hours retention of the sewage influent. Regular checks on the septic tank waste treatment facility. Regular water samples will be taken from those river & borehole to ensure that river water quality is maintained and comply with the prescribes general standards	Daily Monthly	Restcamp Manager or Environmental Officer
Production and disposal of greywater (showers and kitchen operations) Use of chemicals	Reduction in water quality Flora and fauna affected	All of the zinks, showers, and toilets on each restroom are collectively connected to the specially designed liquid waste septic tank. The capacity of this tank accommodates all waste produced within the restcamp. Therefore, no greywater is produced on the restcamp tourism facility.	Regular water quality samples	Weekly / monthly	Restcamp Manager or Environmental Officer
Increased tourists - Increased waste	Solid waste (litter) escaping into the environment. Greater quantity to be disposed of – landfill	Implementation of the Waste Management Plan and application of the waste management hierarchy Suitable collection points for the waste	Monthly compliance checks	Monthly	Restcamp Manager Restcamp personnel

	= land take, burning = air pollution	on Restcamp. Waste collected weekly and transported in suitable containers. Any hazardous waste such as waste oil/lubricant cans are stored in a hazardous waste storage bin and disposed of by an accredited hazardous waste handlers.			
Increased tourists – Food introduced into the ecosystem	Change in the local flora and fauna, and habits of aquatic species	Notices to inform guests of the rules Appropriate bins and removal of waste each day	None	None	Restcamp Manager Restcamp personnel
Restcamp & Safari boats Maintenance or renovations	Oils, fuels, chemicals paints, waste entering the aquatic environment and causing pollution / contamination – reduce water quality, affect flora and fauna	Implementation of the Waste Management Plan Suitable collection points for the waste on Restcamp. Waste collected daily and transported in suitable containers Spill kits Limit use of chemicals Training of staff	Monthly compliance checks None	Monthly	Restcamp Manager or Environmental Officer
Lighting from the safari boats & Restcamp	Artificial lighting could affect birds and fish in particular, as these species rely upon moonlight to navigate at night time. Amphibians, such as frogs could also be disturbed, and feeding and mating rituals could be affected. Sources	Use of energy efficient light forms Low beam / low LEDs Avoid lighting where unnecessary Avoid lights being grouped together. Lights switched off at night	Monthly compliance checks	Monthly	Restcamp Manager or Environmental Officer
Maintenance of area in the vicinity of the Restcamp	Removal of vegetations	Remove invasive alien species Remove vegetation during the winter months or prescribed times by the Environmental Officer	Monthly checks to visually check the growth of vegetations	Monthly	Restcamp Manager Environmental Officer
Increased number of guests and operations	Water Resources: Use of Energy and waste production	Train staff so they are aware of the need to save energy Inform guests and include information	Monitor fuel use. Monitor energy consumption and water	Monthly	Restcamp Manager or Environmental Officer

		on the Restcamp Use of energy wisely – solar power (ensure well maintained) and energy saving lightbulbs	abstraction Monitor waste as part of waste management plan		
Location of Restcamp	Geomorphology and ecological impacts	The Restcamp shall be moored at the same location which will not move during operations. These sites have been identified and shall not be deviated from except is sensitive environmental features are located in the area and the mooring spot needs to be moved by a few meters.	Weekly and monthly compliance checks	Weekly and monthly	Restcamp Manager
Soil / water pollution	Negative impact on soil	Adequate solid waste containers must be provided for garbage collection to minimise entry into gullies and ultimately into the water. Workers must be instructed to use garbage containers and their use or lack of use monitored where possible	Weekly and monthly compliance checks	Weekly and monthly	Restcamp Manager
Fires	Destruction of natural habitat	Placement of “NO Fire” sign boards around the restcamp and Open fire to be avoided	Weekly and monthly compliance checks	Daily and monthly	Restcamp Manager

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Nyepuz Consultancy CC
Environmental and Management Consultant



MAYEYI TRADITIONAL AUTHORITY

Ref:

Enq: M's Precious Mulauli
(Cell: 0813314412) → 0813630908

Private Bag 2466
Ngweze, Katima Mulilo
Zambezi Region
Republic of Namibia
Date: 12.06.2017

To *Whuparo Conservancy*
.....
.....

Dear/Sir

The Mayeyi Traditional Authority is hereby acknowledge that Whuparo Conservancy has signed a contract with Wildest Logistic on taking over the Rupara rest camp Management to Manage the camp on beh alf of the Conservancy.

Looking forward with your usual Cooperation

yours faithfully

Secretary Albert Zibiro

Traditional Councillor

Albe

ADDENDUM TO RUPARA RESTCAMP MANAGEMENT AGREEMENT

This Addendum (the "Addendum") is made on the 9 June 23 between Wuparo Conservancy (hereinafter referred to as the "Conservancy") and Nkasa Lupala Tented Lodge (hereinafter referred to as the "Operator"), collectively referred to as the "Parties."

WHEREAS, the Parties have previously entered into a Management Agreement for Rupara Campsite (hereinafter referred to as the "Agreement") on the 9 March 2017, and

WHEREAS, the Parties now desire to amend certain clauses of the Agreement;

NOW, THEREFORE, the Parties hereby agree to amend the Agreement as follows:

1. Amendment to Clause 2.2:

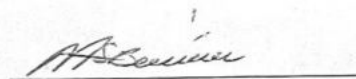
The existing Clause 2.2 of the Agreement shall be replaced with the following:

"2.2 The Agreement shall commence on the date of the signature of this Agreement and shall expire on the same date as the Nkasa Lupala Tented Lodge Joint Venture Agreement with Wuparo Conservancy that was renewed on 9 June 2023."

2. All other provisions of the Agreement, not modified by this Addendum, shall remain in full force and effect.

3. This Addendum shall be read in conjunction with the original Agreement. In case of any inconsistency between the provisions of this Addendum and the Agreement, the provisions of this Addendum shall prevail.

IN WITNESS WHEREOF, the Parties hereto have executed this Addendum as of the date first above written.



Wuparo Conservancy

Conservancy

Date: 9/6/23



Nkasa Lupala Tented Lodge

Operator

Date: 9/6/23



MAYEYI COMMUNITY COURT

Ref.....

Po Box 2466
Ngweze, Katima Mulilo
Republic of Namibia

Enquiries CBM MAKWELE
0813197262
0816947026

Date 03/06/2011

TO WHOM IT MAY CONCERN:

THE MAYEYI TRADITIONAL AUTHORITY HEREBY CERTIFY THAT THE WUPARO CONSERVANCY HAS BEEN AUTHORIZED TO OPERATE A COMMUNITY CAMPSITE WITHIN THEIR AREA OF JURISDICTION.

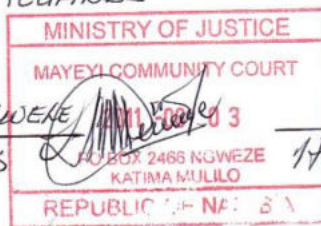
THE AREA IS SITUATED IN SOUTHERN DIRECTION AND CALLED RUPARA COMMUNITY CAMPSITE.

THIS AUTHORITY THEREFORE REQUEST YOUR RELEVANT TO SUPPLY WITH A CERTIFICATE.

LOOKING FORWARD YOUR ASSISTANCE IN THIS MATTER

With Kind Regards

CHRIS B. MAKWELE
COURT CLERK



HON. NGAMBERA



Box 296 Katima Mulilo
Namibia

Inquiries: Mr Muyenga Shakwa, Cell: 081 599 7761.

Date: 26 September 2023

Mr Simone Michelletti
Director
Wild waters group
Katima Mulilo
Namibia

RE: CAMPSITE EXTENSION

This letter serves as a reference to the meeting held on the 24 May 2023 at the conservancy office where two parties met to discuss concerns of area development to our community. The above mentioned Conservancy Management Committee are hereby considering your request of extending Rupara rest camp (*self catering and camping site*) to accommodate more people for the conservancy to get more in return. .

Due to the ongoing relationship we have the Conservancy Management Committee is hereby granting you the right to extend Rupara rest camp with no doubt to it as agreed already. We are here official writing to allowed or permit you to go ahead with the plan of extension for the better quality services.

We count to our usual agreement and community support and hope to have good and successful business in good faith.

Yours in Community Conservation

Mr Muyenga Shakwa
Chairperson: Wuparo Conservancy

Cell: 081 599 7761

