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REPORT:

ENVIRONMENTAL MANAGEMENT PLAN FOR FARM OMIHE NO. 127, OTJOZONDJUPA REGION, NAMIBIA

PROJECT NUMBER: ECC-150-520-REP-05-D

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TITLE AND APPROVAL PAGE

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ABBREVIATIONS

Abbreviation	Description
<	less than
>	greater than
˚C	degrees celsius
dB	decibels
DoF	Directorate of Forestry
EAP	environmental assessment practitioner
ECC	Environmental Compliance Consultancy (Pty) Ltd
EIA	environmental impact assessment
EMA	Environmental Management Act No.7 of 2007
EMP	environmental management plan
GN	government notice
ha	hectares
IFC	International Finance Corporation
Km/h	kilometre per hour
m	metre
mm	millimetre
masl	meters above sea level
MAWLR	Ministry of Agriculture, Water and Land Reform
MEFT	Ministry of Environment, Forestry and Tourism
MME	Ministry of Mines and Energy
MSDS	material safety data sheet
Ltd.	limited
PPE	personnel protective equipment
Pty	proprietary
RoD	record of decision
OSH	occupational safety health

1 INTRODUCTION

1.1 PROJECT BACKGROUND

Environmental Compliance Consultancy (Pty) Ltd (ECC) has been contracted by Anne Carola Diekmann to develop an environmental management plan (EMP) for the proposed subdivision of Portion A, a 1000 ha area, on farm Omihe No. 127 for tourism-related activities, in the Otjozondjupa Region, Namibia. Consistent with the Environmental Management Act (EMA) No.7 of 2007 and its 2012 Regulations, an environmental clearance certificate application will be submitted to the Ministry of Environment, Forestry and Tourism (MEFT) for the Project, as the competent authority to make a Record of Decision (RoD) on the proposed land developments.

Farm Omihe No. 127 is situated along the B1 national highway, ~ 50 km south of Otjiwarongo in the Otjozondjupa Region (Figure 1). The farm is situated adjacent to the renowned Okonjima Nature Reserve and is notably and strategically positioned near the Etosha National Park and the Waterberg Plateau National Park.

1.2 PROJECT DESCRIPTION AND SITE LAYOUT

The current farming operations on farm Omihe No.127 have demonstrated effectiveness over generations, particularly in cattle farming. However, pilot studies and research studies conducted on the natural environment have unveiled a range of other viable farming opportunities. These include small-stock farming, goat meat and cheese production, poultry farming, cattle farming, hunting tourism, game and cattle meat processing, horticulture, fruit and vegetable processing, tourism accommodation, eco-tourism, and nature awareness educational programs.

The proposed subdivision of land from the farm offers ample potential for implementing these operations in the future, with some already in operation. The proposed area, which has historically seen minimal use for cattle farming, boasts suitable grazing land and terrain conducive to small-stock farming, particularly goats. A detailed drawing of the proposed subdivision can be seen in Figure 2.

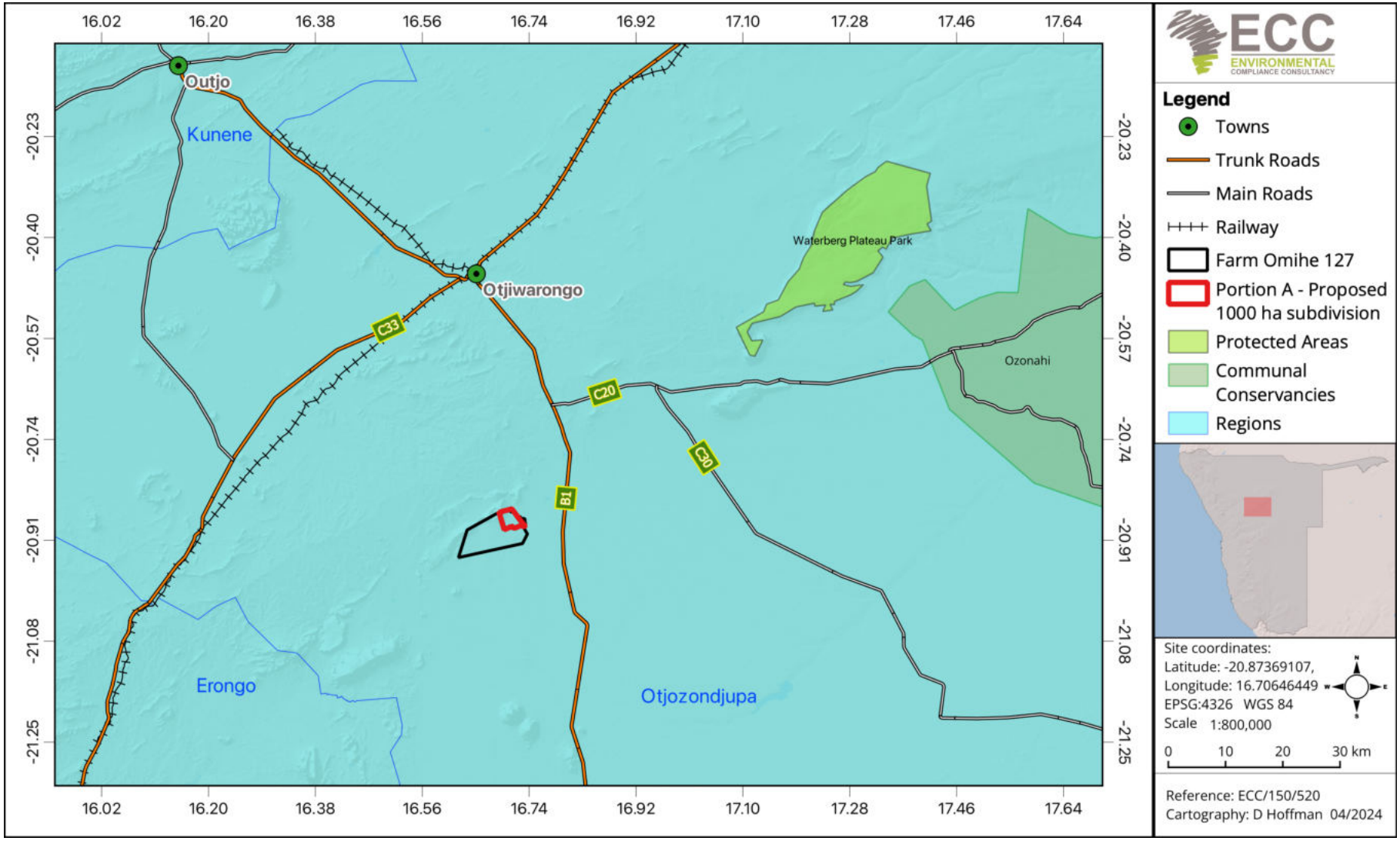
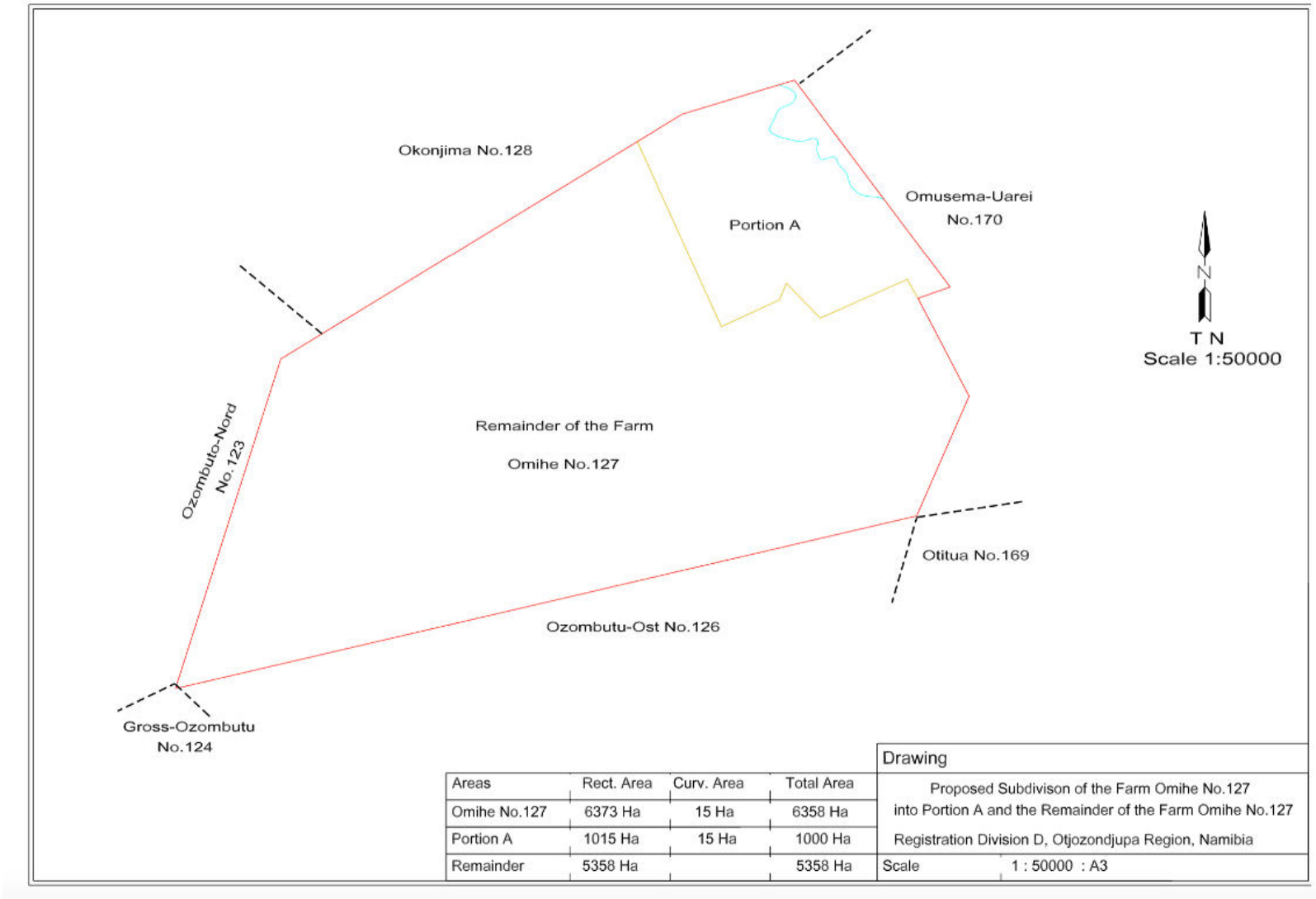


Figure 1 - Location of farm Omihe No. 127.



Areas	Rect. Area	Curv. Area	Total Area
Omihe No.127	6373 Ha	15 Ha	6358 Ha
Portion A	1015 Ha	15 Ha	1000 Ha
Remainder	5358 Ha		5358 Ha

Figure 2 - Proposed subdivision (Portion A) on farm Omihe No. 127 and neighbouring farms.

1.3 BIOPHYSICAL ENVIRONMENT INFORMATION

This section provides an overview of the baseline biophysical environment. The information was retrieved and interpreted based on the best available data of the receiving environment.

Farm Omihe No.127 is situated adjacent to the Okonjima Nature Reserve near Otjiwarongo in the Otjozondjupa Region and is nestled at an elevation of ~1540 meters above sea level (masl). The general area receives on average, annual rainfall ranging from 400 to 450 mm, with distinct climatic conditions characterized by warm summers and cold winters. The mean annual temperature ranges between 20-21˚C. The maximum temperatures generally range between 23˚C and 32˚C, while the minimum temperatures vary between 3˚C and 18˚C. Notably, the hottest months are between September and January, while the coolest months fall in June and July (Bubenzer, 2002 & meteoblue, 2024). These weather conditions are particularly renowned in the interior regions of the country.

The site lies within the thornbush shrubland vegetation type, dominated by the *Acacia (Vachellia* and/or *Senegalia)* tree species and characterized by a dense shrubland structure, which is part of the broader Savanna biome. In terms of terrestrial diversity, this area exhibits a moderate profile when compared to other regions in the country.

Geologically, this area is composed of the Waterberg basin group, a component of the Karoo Supergroup, with rock types consisting of sandstones and conglomerates and the dominant soil type of the area is eutric Fluvisols (Buzenher, 2002).

The site's location places it within the Okahandja groundwater basin and falls within the Omatako 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 which an environmental clearance certificate is sought.

For this project, ECC proposes to only develop a comprehensive environmental management plan (EMP) for the following reason: the proposed project (envisioned for the construction of a small tourism establishment) by nature has a limited environmental footprint and therefore does not trigger significant adverse impacts on the receiving environment. Therefore, subjecting the project to a full environmental impact assessment (EIA) study could be excessively resource-intensive. The neighbouring acknowledgement letters can be seen in Appendix A.

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

Legislations that should be adhered to or are relevant to the proposed Project are listed 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 for current and future generations.
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 protection and sustainable management of natural resources.
Soil Conservation Act, No. 76 of 1969 and the Soil Conservation Amendment Act, No. 38 of 1971	Biophysical protection: Protection of top, and sub-soils in their unique natural state.
Water Resources Management Regulations (No. 269 0f 2023): Water Resources Management Act, 2013.	Protection, management of water resources and pollution prevention.
The Forestry Act, No. 12 of 2001 as amended by the Forest Amendment Act, No. 13 of 2005	Preservation of flora species via authorisation; indigenous, protected and threatened species.
Nature Conservation Ordinance Act No. 4 of 1975 and its regulations.	Biodiversity protection, conservation and rangeland management.
Labour Act, No. 11 of 2007 and regulations relating to the Health and Safety of Employees at Work (No. 156 of 1997)	Social protection; occupational health and safety.
National Heritage Act, No. 27 of 2004.	Protection of artefacts and objects of heritage significance.
Namibia Tourism Board Act (No. 21 of 2000) and Regulations relating to Levy Payable by Accommodation Establishments Government Notice 137 of 2004	Regulatory board. Authorisation regulating the authorisation of tourism establishments.
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 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 authority (i.e. Ministry of Environment, Forestry and Tourism) (MEFT).

The EAP CV's are provided in Appendix B.

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

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2 ENVIRONMENTAL MANAGEMENT FRAMEWORK

2.1 OBJECTIVES AND TARGETS

Environmental objectives and targets have been developed so that farm 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 /Farm Manager (Proponent)	- 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
	- 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 practices are 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.
Foreman (Appointed HSE responsible person)	The farm foreman will be responsible for the implementation of the EMP for the farm. The foreman will be available as required throughout the operation of the farm and is tasked with the following roles: - 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/farm manager; - Complete monthly EMP checklists and submit findings to the general/farm manager; - Provisioning of environmental awareness/management training, capacity building and inductions; - Ensuring that best environmental practices are undertaken throughout the operations of the farm; - 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
	- Responsible for compliance with conditions as set out in this EMP.
Employees, contractors and visitors	Contractors hired for operations or maintenance activities at the farm should comply with this EMP and shall be responsible for the following: - 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
Otjiwarongo	+264 (67) 30-3734	+264 (67) 1-0111	+264 (67) 30-4444

For large-scale spills (i.e., >200 litres) and other significant environmental incidents, the fire service should be notified as required and the 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 farm manager/foreman who is overall responsible for the management of complaints, and shall do the following:

- Inform the general/farm 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 farm 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 farm 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 & COMPLIANCE MONITORING

Annual inspections of the different operational areas will be undertaken by the general/farm 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 farm manager.

4.3 NON-COMPLIANCE

Where it has been identified that works are not compliant with this EMP, the general/farm 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 farm 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/farm 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 0f 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 and drilling permits	Ministry of Agriculture, Water and Land Reform (MAWLR)	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 0f 2023).
Effluent discharge or Sewage Permits (If applicable)	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 0f 2023).
Permit for the clearing of land	Ministry of Environment, Forestry and Tourism	Should the Proponent opt to remove any Forestry protected species, a permit should be acquired from DoF as mandated under the Forest Act No. 12 of 2001.

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	– 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	Farm Manager Foreman
Air quality	Dust generation during construction /future maintenance activities.	To minimise the potential for dust generation, the following management measures should be implemented, as required: – 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 – Employees should use and wear appropriate PPE (e.g. dust masks).	Daily	Farm Manager Foreman Employees
Noise	Noise generation from maintenance or new construction activities leading to noise nuisance and potential hearing loss towards	The Labour Act No.11 of 2007 and Regulations relating to the Health and Safety of Employees at Work (GN 156/177) 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.	Daily	Farm Manager Foreman Employees

Aspect	Potential impacts	Management/mitigation measures	Monitoring requirements	Responsibility
	site-based employees and disturbance to biodiversity.	The following mitigation measures should be implemented, as required: – The Proponent should develop a healthy and safety management plan that considers noise generation (where applicable); – 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.		
Occupational health and safety	Occupational health and safety concerns during the operational phase and potential future construction or maintenance phases.	To promote a safe and conducive working environment, the following mitigation measures should be considered: – A health and safety management plan should be developed and implemented on-site by the Proponent; – 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;	Daily	Foreman

Aspect	Potential impacts	Management/mitigation measures	Monitoring requirements	Responsibility
		– 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; – No un-authorised use of equipment should be allowed; – In the unlikely event of a death occurring within farm 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		

Aspect	Potential impacts	Management/mitigation measures	Monitoring requirements	Responsibility
		– Counselling should be provided to the witnesses and other personnel members who may have been impacted by the event.		
Fire risks management	Potential risk of fire occurrences and veld fire leading to ecosystem breakdown.	– Development of a fire management system through the process of risk identification and assessment; – Identify and signpost dedicated assembly points at the campsite / self-catering unit 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 can include pails of water, buckets of sand, or portable extinguishers; – 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.	Weekly, monthly and yearly.	All staff

Aspect	Potential impacts	Management/mitigation measures	Monitoring requirements	Responsibility
Biodiversity Conservation	The possibility of encountering and interacting with biodiversity on-site.	The Nature Conservation Ordinance Act No. 4 of 1975 and its Regulations, Controlled Wildlife Products and Trade Act No. 9 of 2008 and the Animals Protection Act 71 of 1962 should be closely followed regarding any encounters with wildlife within site boundaries. – Wildlife encountered should be ethically treated; – 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 such an animal is found on someone within or surrounding site boundary; – 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 it should be used by a	Daily, monthly and yearly.	Farm Manager and Foreman

Aspect	Potential impacts	Management/mitigation measures	Monitoring requirements	Responsibility
		professional/registered pest control company and/or 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.		
	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).	To counteract the potential risk of removing certain protected plant species, the following control management measures should be implemented: – Before 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 issued by the Directorate of Forestry (DoF); – 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;	Daily, monthly	Farm Manager Foreman

Aspect	Potential impacts	Management/mitigation measures	Monitoring requirements	Responsibility
		– Promote revegetation of cleared areas upon completion of construction activities; – 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	In case of discovering or unearthing undiscovered heritage sites, the following measures (chance-find procedure) shall be applied: – Works to cease and the area to be demarcated with appropriate tape by staff, and the farm manager to be informed; and – Archaeological/heritage artefacts/graves are to remain undisturbed until an investigation is conducted. – An investigation should be conducted by first notifying the National Heritage Council (NHC). This determines the level of management and preservation of such heritage artefacts (objects).	Daily	All staff members

Aspect	Potential impacts	Management/mitigation measures	Monitoring requirements	Responsibility
Soil pollution control	Emergency incidents/ accidental release of hazardous substances leading to soil contamination.	The following measures should be taken into consideration regarding storage, handling and spill management of fuel, chemicals or hazardous substances: **Storage** – 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; – 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. **Spills** Spill kits with the following items as a minimum should be made available on-site:	Daily, monthly and yearly	All staff members

Aspect	Potential impacts	Management/mitigation measures	Monitoring requirements	Responsibility
		○ Absorbent materials; ○ Shovels; ○ Heavy-duty plastic bags; and ○ Protective clothing (e.g., gloves and overalls). – 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'. **The following points apply to all areas on site:** – Assess the situation for potential hazards;		

Aspect	Potential impacts	Management/mitigation measures	Monitoring requirements	Responsibility
		– Do not come into contact with the spilt substance until it has been characterised as safe and necessary personal protective equipment (PPE) is provided; and – Isolate the area as required. **Spill management procedures:** – 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 farm manager.		
Groundwater pollution control	Possible nutrient enrichment of groundwater due to leakage of sewage into the groundwater.	– Ensure compliance with the Water Resources Management Regulations (No. 269 0f 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	Daily and weekly	Farm Manager Foreman Employees

Aspect	Potential impacts	Management/mitigation measures	Monitoring requirements	Responsibility
	Potential risk associated with the discharge of wastewater into the environment.	(Sections 66 - 68) of the Water Resources Management Regulations (No. 269 of 2023); – Effluent waste discharge permits should be in place and permit conditions should be adhered to (if applicable); – 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	Potential lowering of groundwater due to water abstractions during operation.	– Ensure compliance with the Water Resources Management Regulations (No. 269 0f 2023): Water Resources Management Act, 2013; – Specifically, 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 0f 2023). – Abstraction permits should be in place; – Turn off pumps when abstraction is not required; – Adopt a water-wise mindset on site;	Daily and weekly	Farm Manager Foreman Employees

Aspect	Potential impacts	Management/mitigation measures	Monitoring requirements	Responsibility
		– 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 – 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.	– 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)	Waste management should follow the International Finance Corporation (IFC) standards as follows: – 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;	Daily and weekly	All staff member

Aspect	Potential impacts	Management/mitigation measures	Monitoring requirements	Responsibility
		– Ensure a high standard of housekeeping across/within farm 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; – The waste storage areas shall always be kept clean and tidy; – 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, then dispose.		

6 DECOMMISSIONING PHASE

In the event that the Proponent plans to cease with farm operations (and/or if ownership is transferred or leased), 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. Should the new owner intend to uphold farm operations as is, commitments provided in this EMP should be followed and implemented accordingly.

7 IMPLEMENTATION OF THE EMP

The operations on farm Omihe No. 127, Portion A, 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 June 2024;
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; and
E. Must not be copied without the prior written permission of ECC.

8 REFERENCES

Bubenzer, O. (2002). Project E1 - Atlas of Namibia. [online] Available at: http://www.uni-koeln.de/sfb389/e/e1/download/atlas_namibia/e1_download_physical_geography_e.htm.

meteoblue. (2024). Simulated historical climate & weather data for 20.87°S 16.7°E. [online] Available at: https://www.meteoblue.com/en/weather/historyclimate/climatemodelled/-20.869N16.704E [Accessed 6 Jun. 2024].

Mendelsohn, J., Jarvis, A., Roberts, C., & Robertson, T. (2002). Atlas of Namibia. A portrait of the land and its people. Cape Town: David Philip Publishers.

APPENDIX A – ACKNOWLEDGEMENT LETTERS

APPENDIX B – EAP CVS

Environmental Compliance Consultancy (Pty) Ltd
P O Box 91193 Klein Windhoek Namibia
info@eccenvironmental.com
www.eccenvironmental.com
+264 81 669 7608

ECC
ENVIRONMENTAL
COMPLIANCE CONSULTANCY

ECC-150-520-LET-04-D

20 June 2024

Dear Sir or Madam,

NOTIFICATION OF ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED SUBDIVISION OF PORTION A, A 1000 HA AREA, ON FARM OMIHE NO. 127 FOR TOURISM-RELATED ACTIVITIES, OTJOZONDJUPA REGION, NAMIBIA.

Environmental Compliance Consultancy (ECC) has been contracted by Anne Carola Diekmann, 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 proposed subdivision of portion A, a 1000 ha area, on farm Omihe No. 127 for tourism-related activities, Otjozondjupa region, Namibia. The Project locality map is presented in Appendix A.

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-proposed-subdivision-of-portion-a-on-farm-omihe-no-127-for-tourism-related-activities-in-the-otjozondjupa-region-namibia/

We kindly request neighbours and stakeholders to provide their contact information and sign this form to acknowledge receipt of this notification.

Owner or Lessee Name & surname: Rosalea Hanssen

Farm Name & Number: OKONJIMA 128

Cell phone number: 081 - 1282051

Email address: rosalea@okonjimalodge.com

Signature:

Yours sincerely,

Stephan Bezuidenhout
stephan@eccenvironmental.com

Jessica Bezuidenhout Mooney
jessica@eccenvironmental.com

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We kindly request neighbours and stakeholders to provide their contact information and sign this form to acknowledge receipt of this notification.

Owner or Lessee Name & surname: Hans Erno Diekmann.

Farm Name & Number: Omihe 127

Cell phone number: +264 811282070

Email address: dingo.omihe@gmail.com.

Signature:

Yours sincerely,

Stephan Bezuidenhout
stephan@eccenvironmental.com

Jessica Bezuidenhout Mooney
jessica@eccenvironmental.com

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We kindly request neighbours and stakeholders to provide their contact information and sign this form to acknowledge receipt of this notification.

Owner or Lessee Name & surname: HWR Grensing

Farm Name & Number: Omusema Ware # 129

Cell phone number: 081-2443533

Email address: warei@iway.na

Signature: Grensing

Yours sincerely,

Stephan Bezuidenhout
stephan@eccenvironmental.com

Jessica Bezuidenhout Mooney
jessica@eccenvironmental.com

+264 81 669 7608
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www.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.

CURRICULUM VITAE

Diaan Hoffman

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