

**DRAFT ENVIRONMENTAL
MANAGEMENT PLAN
REPORT FOR THE PROPOSED
NYIME SAFARI LODGES
(ta)BUFFALO LODGE
Part of Bwabwata National Park
(in Buffalo Core Area).**

REF:010724-1



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1 PROJECT OUTLINE

1.1 Introduction

This document is the Environmental Management Plan (EMP) for the Buffalo Lodge Environmental Assessment. It supports the Buffalo Lodge Scoping report by outlining a range of measures aimed at avoiding, reducing, and addressing potential adverse effects of the project across its various phases, including pre-operational (i.e. planning and design, construction), operational and post-operational phases. In addition, it also includes the project's environmental monitoring plan.

1.2 Project Description

The lodge facilities will include the following:

- Reception Area,
- Parking area
- Offices, and
- back of house.
- Rooms/suites
- Camping sites

The structures will be designed and built to blend in with the surrounding landscape. Thatching grass, boulders, and wood will be the primary building materials. The lodge and associated facilities are planned to be completed in six months. Except for the new underground drainage lines and access to the wastewater tanks, there will be very little earthwork.

The lodge will be open all year, with peak seasons in March, July, and October.

2 EMP OBJECTIVES

The objectives of this plan are to:

- Describe all environmental safeguards and mitigation measures;
- Provide a monitoring tool for MET and other stakeholders;
- Minimise negative impacts of the development and operational phases of this project;
- Enhance the positive impacts;
- Provide a tool which allows a succession of managers to have a consistent approach to managing the lodge and associated activities;
- Meet the requirements of relevant legislation;
- Allow the operator to monitor environmental impacts; and

- Create awareness among all staff and key stakeholders (including MET) of the importance of maintaining sound environmental standards in all operations of the lodge.

The strategies employed to achieve the objectives include:

- Ensure that the developer is aware of the provisions of the EMP during the planning phase;
- ensure that the EMP is an integral part of the operations procedures for the lodge;
- incorporate environmental monitoring into the operations of the lodge;
- create environmental awareness among all staff; and

3 GENERAL REQUIREMENTS FOR IMPLEMENTATION OF THE EMP

3.1 EMP Administration

3.1.1 Onsite Environmental Management

The lodge operator and staff, including the construction team, shall be required to familiarise themselves with the content of the document while the Lodge Manager shall be tasked with overall responsibility for implementation once the lodge is operational. The specific responsibilities of operator with pertaining to the EMP include:

- Implement the EMP
- Periodically engage a Consultant to review and update the EMP.
- Ensure all reporting and monitoring required under EMP is undertaken, documented and distributed as needed
- Conduct environmental site training (toolbox talks) and inductions with the support of an environmental consultant.
- Conducts environmental audit at work site with the support of environmental consultant.
- Close out all non-conformances.
- Ensure materials being used on site are environmentally friendly and safe.

3.1.2 Monitoring Agent (MET)

Ministry of Environment & Tourism officials shall be acquainted with the document and they (or their appointed agent) shall monitor during the construction phase and operational phase.

Their duties include to:

- Approve the EMP and any amendments to the EMP.
- Approve reports of environmental issues and non-conformances as issued.

- Review and approve environmental reports submitted as part of EMP implementation.

3.1.3 Environmental Awareness Training

3.1.3.1 Construction Phase

The operator shall ensure that all his/her staff are aware of the importance and implications of the EMP and the need to commit to the relevant provisions contained in the document.

3.1.3.2 Operational Phase

The operational phase shall require that roles and responsibilities for all employees need to be established while the reasons and importance of mitigation measures shall be clearly explained. This shall be an ongoing process.

The positive socio-economic and biodiversity impacts involve a number of external stakeholders, and these relationships require close and regular interventions. The former requires regular meetings with the conservancy through meetings of the Joint Management Committee (JMC).

At least two staff members (guides) shall receive training in wildlife monitoring in order that they may report wildlife sightings to MET. Guides shall receive specialist training in big game guiding.

It is also important for all staff to understand the context of the lodge development and the links between the concession granted to the conservancy and how this off-sets the costs which conservancy residents bear for having a national park as a neighbour.

The development of appropriate materials for guests shall also ensure that the lodge and the activities are understood within the conservancy context. This should underpin the lodge “branding” while there is a need to acknowledge MET for their role in making the park relevant to their neighbours.

4 ENVIRONMENTAL AND SOCIO-ECONOMIC IMPACT MANAGEMENT

The potential environmental and socio-economic impacts associated with the proposed project have been identified and are linked to specific mitigation and management measures as shown below.

4.1 Planning and Design Phase Management Plan

The Planning and Design Phase Management Plan addresses all aspects of the planning and design phase, such as the detailed architectural, infrastructural and engineering services layout and design.

Table 4-1: Planning and Design Phase Management Plan

Activity/ Condition	Aspect/ Hazard	Impact/Risk	Mitigation Objective	Mitigation Measures	Responsibility
All project activities	<ul style="list-style-type: none"> • Non-adherence to applicable compliance obligations • Improper and inadequate design of structures and buildings 	<ul style="list-style-type: none"> • Litigation and legal liabilities • Property damage • Injury/death due to unsafe conditions 	Ensure compliance with applicable legal requirements pertaining to surface water, ground water, protected species, etc.	<ul style="list-style-type: none"> • Make appropriate consultations with relevant Monitoring Agents and obtain necessary permits/licenses as advised. • Ensure project team and employee awareness of all applicable compliance obligations and adhere. • Identify sensitive/protected areas (e.g. wetlands) and, where required, ensure appropriate buffer zones are maintained. This is particularly important to consider in planning and siting of buildings and other hardened surface infrastructure 	Operator
Safari lodge footprint planning and visual environment planning	Unnecessary land disturbance and vegetation destruction due to improper planning	Land degradation and biodiversity loss	Ensure the Safari lodge footprint is kept to a minimum and that sensitive environments are taken into consideration	<ul style="list-style-type: none"> • Refine the final layout so that disturbance of sensitive environments is avoided/minimized • Adjust the location of facilities so as to minimise impact on the riparian zone. 	Operator

Activity/ Condition	Aspect/ Hazard	Impact/Risk	Mitigation Objective	Mitigation Measures	Responsibility
				<ul style="list-style-type: none"> • Infrastructure corresponding to the riparian woodland units (pertaining to the lodge site) must be kept to a minimum and should be of low-impact. • Where possible, make use of earth tones and natural materials rather than primary colours and high-tech finishes. • Limit buildings to recommended height • Where visually break up large bulky buildings into smaller, subtler, less prominent shapes and planes. Make use of canvas roofs and / or suitable paint colours on steel roofs reduce the impact of glare from sunlight. 	
Socio-economic planning	Job creation, skills development and business opportunities	<ul style="list-style-type: none"> • Improvement and benefit to socio-economy both on a local and regional scale. • Enhanced standard of living. • Optimum utilization of available labour as workforce 	<ul style="list-style-type: none"> • Enhancement of local and national economy performance • Equal employment opportunities 	<ul style="list-style-type: none"> • Maximise local employment and local business opportunities • Enhance the use of local labour and local skills as far as reasonably possible • Ensure that goods and services are sourced from the local and regional economy as far as reasonably possible 	Operator

4.2 Construction Phase

The Construction Phase EMP addresses the environmental risks and impacts associated with the construction phase. This plan must be adhered to at all times during the construction phase.

Table 4-2: Construction Phase Management Plan

Activity/ Condition	Aspect/ Hazard	Impact/Risk	Mitigation Objective	Mitigation Measures	Responsibility
Establishment of safari lodge	Site clearing	<ul style="list-style-type: none"> • Habitat destruction and modification • Loss of scenic value of landscape • Soil erosion on disturbed sites • Creation of non-productive degraded land areas • Decreased vegetation cover 	To ensure that the construction footprint is kept to a minimum in order to conserve and protect plant and animal species and habitat and to ensure that site facilities, structures and infrastructure do not impose on the surrounding environment	<ul style="list-style-type: none"> • Plan to conserve biodiversity, minimize the construction footprint/ land disturbance/vegetation clearance and where possible, restrict all construction related activities to previously disturbed areas or transformed vegetation. • Buffer areas and identified sensitive environments must be demarcated as No-go zones, where no construction activities or staff are permitted. • Demarcate vegetation specimens and animal tracks to be retained with danger tape and maintain site demarcations for the duration of the construction phase. • Ensure that materials storage areas are demarcated and that materials do not move outside of the demarcation lines. • Clearly indicate which activities are to take place in which areas within the site e.g. the mixing of cement, stockpiling of materials etc. Limit these activities to single sites wherever possible. • Remove topsoil in all disturbed areas in preparation for future rehabilitation activities • Where necessary institute erosion control measures e.g. redirect flows from heavy runoff areas; put a barrier 	Operator

Activity/ Condition	Aspect/ Hazard	Impact/Risk	Mitigation Objective	Mitigation Measures	Responsibility
				against slope direction to control runoff in problem areas; etc • Rehabilitate disturbed areas	
	<ul style="list-style-type: none"> • Inappropriate management of materials to be used during construction • Stockpiles, storage and Handling 	Land, water and air pollution	Ensure that waste management activities on site are undertaken in the correct manner and that staff are aware of the procedures	<ul style="list-style-type: none"> • Ensure that concrete and cement works are undertaken in specified areas only. • Ensure that all operations that involve the use of cement and concrete are carefully controlled. Water and slurry from concrete mixing operations must be contained to prevent pollution of the ground surrounding the mixing points. • Use plastic trays or liners when mixing cement and concrete: Do not mix cement and concrete directly on the ground. • Excess concrete from mixing must be deposited in a designated area awaiting removal to an approved landfill site. • All visible remains of excess concrete shall be physically removed immediately and disposed of as waste. Washing the visible signs into the ground is not acceptable. All excess aggregate shall also be removed. • Ensure that all hazardous substances, petroleum, chemical, harmful and hazardous materials must be stored in enclosed, banded areas. The banded areas are to be clearly marked. • Ensure that no oil, petrol, diesel etc. is discharged onto the ground. 	Operator

Activity/ Condition	Aspect/ Hazard	Impact/Risk	Mitigation Objective	Mitigation Measures	Responsibility
				<ul style="list-style-type: none"> • Exercise extreme care with the handling of diesel and other toxic solvents so that spillage is minimised. • Conserve topsoil through pre-emptive stripping and stockpiling prior to the commencement of works in any area, pending reapplication during rehabilitation. 	
	Destruction or alteration of cultural, archaeological or historical sites	Damage or destruction of site contents	Minimise damage during site clearance and any excavation works	<ul style="list-style-type: none"> • All areas of archaeological, cultural, palaeontological or historical heritage importance/significance are to be identified. These areas are to be demarcated, appropriate buffers put in place and the National Heritage Council of Namibia is to be notified and appropriate action taken as per the authority's advised course of action. • Where archaeological, cultural, palaeontological or historical 'chance finds' are encountered, then work in the area is to be halted, and a cultural heritage specialist is to be engaged to assess the situation and make recommendations 	Operator
	Noise emission from construction machinery, moving vehicles, etc	<ul style="list-style-type: none"> • General nuisance of the construction activities • Occupational hazard to employees and disturbance to surrounding land-users and wildlife species 	Noise and vibration levels should not interfere with daily activities	<ul style="list-style-type: none"> • Where feasible, operation of noisy machinery to be avoided in early morning and late evenings when general activities are low to reduce the extent of increase on background noise. • Ensure that equipment, machinery and vehicles are in good working condition and that they are regularly serviced. 	Operator

Activity/ Condition	Aspect/ Hazard	Impact/Risk	Mitigation Objective	Mitigation Measures	Responsibility
				<ul style="list-style-type: none"> • Provide work personnel with personal protective clothing 	
	Dust emission from machinery, moving vehicles, etc	Decreased air quality which can impact workers and surrounding environment	Dust level created must not impact the health of project workers and surrounding environment	<ul style="list-style-type: none"> • Water work area and associated roads. • Transportation vehicles shall follow in the designated area and road. • Use exposed stockpiles and material as soon as possible • Cover any exposed materials during transportation 	Operator
	Petroleum, diesel, etc spillages	<ul style="list-style-type: none"> • Water, air and land pollution • Injuries 	Ensure no pollution to the environment and local community	<ul style="list-style-type: none"> • Recycle and/or reuse substances where feasible • Make use of Operational control procedures and materials Material Safety Data Sheets • Provide Personal Protective Clothing/ • Keep an inventory of all chemical substances and their hazards both to animal life and the environment in general. • Where possible minimize total quantity of chemical substances used. • Where possible substitute toxic substances for non-toxic substances. • Where possible use environmentally friendly substance e.g. water soluble cleaning agents rather than organic solvents. • Practice immaculate housekeeping and this must take place with particular and constant efforts being made to avoid spills through preventive maintenance. 	Operator

Activity/ Condition	Aspect/ Hazard	Impact/Risk	Mitigation Objective	Mitigation Measures	Responsibility
	Vehicle and equipment maintenance and storage	Decrease of air quality due to gas emissions and particulate matter	Maintain air emissions within legal requirements	Ensure that equipment, machinery and vehicles are in good working condition and that they are regularly serviced.	Operator
		Land pollution, water pollution and ill-health due to storage and discharge of oils, lubricants and other hazardous materials during operation and maintenance	Prevent the release of hazardous materials into the environment	<ul style="list-style-type: none"> • Provision and maintenance of designated lined and bunded storage and fuelling areas • Provide personal protective clothing/equipment to all employees. 	Operator
	Domestic Waste (garbage, litter, human waste, etc.)	Pollution of local area's ecosystem and environment (e.g. water, soils, vegetation, air, etc)	Minimise waste production and prevent pollution of land, water, air and biotic environment.	<ul style="list-style-type: none"> • Domestic waste is properly collected and disposed of at approved locations • Implement the 4 Rs (Reuse, Recycle, Reclaim, Rethink) of waste management. 	Operator
	Accidents and unplanned events	Injuries, ill-health, environmental pollution, etc	Minimize risks to the environment and workers' personal health and safety	<ul style="list-style-type: none"> • Train and monitor worker safety • Provide personal protective equipment/ clothing • Conduct regular inspections of equipment and machinery 	Operator
	Fire occurrence	Biodiversity loss	To safe guard and protect the environment from any potential fire hazards	<ul style="list-style-type: none"> • Put in place fire guards • Avoid uncontrolled fires • Promote education and awareness on the effects of fires and the importance of conservation of biodiversity 	Operator

4.3 Operational Phase Management Plan

The Operational Phase Management Plan identifies and addresses the environmental risks and impacts associated with the day-to-day operation of the development.

Table 4-3: Operational Phase Management Plan

Activity/ Condition	Aspect/ Hazard	Impact/Risk	Mitigation Objective	Mitigation Measures	Responsibility
Various activities at the lodge	<ul style="list-style-type: none"> Biodiversity and natural resource management Alien species invasive 	Biodiversity loss and resource depletion	To ensure the continued integrity of the natural environment and the conservation of fauna, flora and other natural resources.	<ul style="list-style-type: none"> Ensure that all conserved species and specimens are suitably protected for the duration of the operational phase. No protected species may be removed without the relevant permits. Prevent bush clearing Monitor water and energy consumption to ensure that there is no undue waste. Keep up-to-date records of water and energy usage/monitoring and ensure that consumption does not exceed permitted limits. Take appropriate action to reduce consumption where necessary. Install leak detection system and promptly attend to leaks as required. Develop a management and monitoring programme for alien and invasive s. Monitor all sites disturbed by construction activities for colonisation by exotics or invasive plants and control these as they emerge 	Operator
	Improper handling of materials to be used at the lodge	Generation of solid, liquid and hazardous waste	To ensure proper waste storing, handling and disposal of materials and waste	<ul style="list-style-type: none"> Ensure that all hazardous substances (chemicals, oils, etc.) are stored in appropriate, tamper proof containers in locked stores. 	Operator

Activity/ Condition	Aspect/ Hazard	Impact/Risk	Mitigation Objective	Mitigation Measures	Responsibility
				<ul style="list-style-type: none"> • Petroleum, chemical, harmful and hazardous materials must be stored in enclosed, bunded areas. The bunded areas shall be clearly marked. • The bund must have a volume of 10% of the volume of the largest tank in the storage area plus 10% of the volume of all other tanks. • The slab must be sloped towards a sump to enable any spilled fuel and water to be removed. • Any wastewater collected at the sump shall be disposed of as hazardous waste. • Ensure that all hazardous substances are used and handled by qualified personnel on bunded surfaces. • Ensure that no oil, petrol, diesel etc. is discharged onto the ground. • Gas and liquid fuel may not be stored in the same storage area. • No smoking is allowed inside the stores or within 3m of a bund. • Ensure adequate fire-fighting equipment at the fuel stores • Exercise extreme care with the handling of diesel and other toxic solvents so that spillage is minimised. 	
	Soil erosion	Land degradation and siltation of water bodies	To ensure that areas cleared of vegetation are protected and allowed to restabilize	<ul style="list-style-type: none"> • Monitor soil erosion and appropriate institute control measures • Rehabilitation/revegetation of disturbed areas 	Operator

Activity/ Condition	Aspect/ Hazard	Impact/Risk	Mitigation Objective	Mitigation Measures	Responsibility
	Vehicles and equipment management	<ul style="list-style-type: none"> • Air, land and water pollution • Traffic hazards 	To maintain air quality standards and limit soil and water contamination and pollution	<ul style="list-style-type: none"> • Maintain site vehicles and equipment in an acceptable state of use and repair. • Periodically monitor vehicle/equipment emissions • All vehicles must be road-worthy and drivers must be qualified and made aware of the potential road safety issues and need for strict speed limits • Ensure personnel, vehicles and equipment move along designated routes. • Prohibit off-road driving. • Ensure speed control measures are implemented on site and in the surrounding area to reduce potential traffic hazards. • Maintenance activities should be limited to daylight hours and vehicles should remain on the designated roads at all times. • Encourage carpools and lift clubs and staff picked up at a central point 	Operator
	Generation of domestic Waste (garbage, litter, human waste, etc.)	Pollution of local area's ecosystem and environment (e.g. water, soils, vegetation, air, etc)	Minimise waste production and prevent pollution of land, water, air and biotic environment.	<ul style="list-style-type: none"> • Put in place measures to apply the 4Rs (Reuse, Recycle, Reclaim, Rethink) of waste management e.g. measures to reuse/recycle waste materials such as plastics, cardboards, discarded metal, etc • Properly collect and dispose waste at a suitable waste disposal site • Carry out regular littering/waste management inspections at the lodge 	Operator

Activity/ Condition	Aspect/ Hazard	Impact/Risk	Mitigation Objective	Mitigation Measures	Responsibility
				<p>and surrounding land. Where there is any litter/waste this to be removed and disposed appropriately.</p> <ul style="list-style-type: none"> • Avail waste bins in all key locations of the lodge • Prevent contamination of soil through generator and vehicle petrol, diesel or oil spillages, etc. Any contaminated soil generated is to be contained, disposed-off and/or bioremediated accordingly. • Potentially hazardous waste are to be stored separately from general waste, clearly marked and disposed appropriately. 	
	<p>Health and safety of lodge employees e.g. exposure to workplace hazards in kitchens, handling of materials, etc</p>	<p>Injury/death</p>	<p>Health and safety of lodge employee is to be ensured.</p>	<ul style="list-style-type: none"> • Provide appropriate personal protective clothing • Train staff in appropriate Material Safety Data Sheets for all substances they make use of • Ensure firefighting equipment and first aid kit is in place • Demarcate and place signage on any areas which may pose a safety risk (including trenches, excavations, etc.) • Train staff in workplace hazards and appropriate protective measures. 	<p>Operator</p>
<p>Areas in and around the project area</p>	<p>Veld fires</p>	<p>Property damage and biodiversity loss</p>	<p>To safe guard and protect the environment from any potential fire hazards</p>	<ul style="list-style-type: none"> • Put in place fire guards • Avoid uncontrolled fires • Promote education and awareness on the effects of fires and the importance of conservation of biodiversity 	<p>Operator</p>

4.4 Post-Operational Phase

Although it is not anticipated that this phase of the project will take place, provision has been made for it in case of any eventually. The pertinent issues to be taken into account at this stage include:

- Buildings and Infrastructure decommissioning and demolition
- Ripping and cleaning of concrete slabs
- Control of any alien invasive species
- Water quality issues especially in connection with the high chance of siltation (from disturbed areas).
- Waste management issues and monitoring.
- Management of occupational hazards for workers.
- Assets and security management.
- Personnel, community relations and beneficiaries.

These pertinent issues can be broken down to give the major impacts associated with rehabilitation at the project site and these are:

Table 4-4: Post Operational Phase Management Plan

Impact/Risk	Mitigation Measures
<ul style="list-style-type: none"> • Land degradation. • Altered landscape and reduced visual amenity. 	<ul style="list-style-type: none"> • Plan and document closure. • Rehabilitation of all disturbed areas. • Protection of all unsafe areas.
<ul style="list-style-type: none"> • Soil erosion at disturbed areas. 	<ul style="list-style-type: none"> • Put in place soil erosion control measures e.g. bunding.
<ul style="list-style-type: none"> • Introduction of new weed species and increased weed density and distribution. 	<ul style="list-style-type: none"> • Put in place weed management plan. • All affected areas to be re-vegetated using indigenous plant species.
<ul style="list-style-type: none"> • Conflicts, vandalism and theft of property. 	<ul style="list-style-type: none"> • Retain security at closure.
<ul style="list-style-type: none"> • Loss of employment. 	<ul style="list-style-type: none"> • Draft a detailed policy for handling personnel issues at closure.
<ul style="list-style-type: none"> • Loss of economic and social benefits to both the local community and the nation at large. 	<ul style="list-style-type: none"> • Make use closure plan requirements • Draft a detailed policy for handling community related issues at closure.
<ul style="list-style-type: none"> • Positive impact due to ploughing back activities that the lodge carries out as social corporate responsibility projects. 	<ul style="list-style-type: none"> • Engage local community on their needs.

5 ENVIRONMENTAL MONITORING PLAN

The following represents key monitoring activities throughout the but lodge management may add as the need arises

Note: Most of the monitoring is the responsibility of the manager BUT he/she may delegate as required but those responsible need to have the task included in job description

Table 5-1: Environmental Monitoring Plan

To be Monitored	What needs to be monitored	Frequency	Responsibility
Project contracts	Socio-economic benefits for conservancy delivered by operator	Quarterly	Operator
Project contracts	Conservancy compliance	Quarterly	Operator
Water consumption	Litres used per guest/staff/services	Monthly	Lodge Manager
Sewerage system	Septic tanks	Every three months	Lodge Manager
Sewerage pipes	Leaks	Monthly	Lodge Manager
Grey water pipes	Leaks	Monthly	Lodge Manager
Fat traps	Functioning equipment	Weekly	Lodge Manager
Water installations	Functioning of purification equipment	Weekly	Lodge Manager
Soak-aways	Drainage	Weekly	Lodge Manager
Tracks and open/disturbed land areas	Erosion	Monthly but more intensively after rainfall events	Lodge Manager
Wildlife	Wildlife sightings during game drives	Every game drive	Guides
	Species of special interest	Ongoing	Lodge Manager Guides

6 CONCLUSION

The conscientious implementation of the Environmental Management Plan (EMP) is crucial to ensuring that the project's negative impacts are effectively controlled, allowing for economic growth. The EMP process is strategically designed to not only contribute significantly to the sustainable development of tourism in both the Kavango Region and Namibia at large but also to generate economic benefits that outweigh the negative aspects. Throughout the phases of design, site preparation, and construction, diverse employment opportunities will arise, benefiting engineers, casual labourers, skilled and unskilled workers, as well as suppliers of goods and services. The operational phase will further contribute to economic growth through ongoing demands for goods and services. The potential for substantial improvements in living conditions, both in the short and long term, coupled with the designation of the Kavango-east Region as an eco-tourism destination, underscores the project's necessity and its ability to bring about positive economic impacts that surpass any negative consequences.

ANNEXURE E

A&I Parties Concern;

Q1

Many of the lodges do support communities for example I do livelihoods in the form of developing, marketing local hand crafts, I support over 1000 baskets weavers. Other lodges support schools, nursery schools & local churches. Many of the Divindu lodges support the Karamachan museum. So it is incorrect to state the lodges do not support the local community. The Hambukushu traditional authority is also paid by all the lodges. So that needs to be adjusted. Should these lodges lose business because of private concessions inside the core areas. Then the loss of jobs will be staggering which will seriously impact the local Hambukushu people & the economy of that entire area. 3 local people are employed per bed in the tourism industry. This is an available HAN statistic. So 900 jobs are in jeopardy should these exclusive private tourism concessions go ahead. Besides it will also threaten the RAMSAR status. Which is an internationally recognized status.

Response to question 1

All points are noted,

As earlier indicated, the study does not state that the lodges in the area does not support the community. It's referring to the national parks , namely the two areas of Buffalo and mahango core areas. This areas are seen as island with no benefit to community's living adjacent too or within.

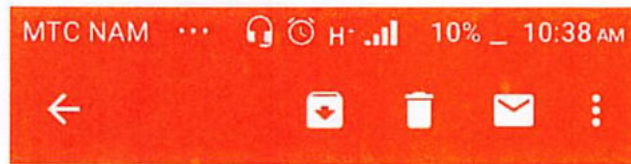
Secondly, the exclusivity does not apply to the entire park access but only to the site demarcated for development of the lodge.

Lodges outside with your clients, and self-drive clients will still have access to the park . The existing of this lodge will not limit or neither stop the other lodges and srif-drive clients from the park.

With regards to the RAMSAR , it is noted and I believe it is as well known by the authority (MEFT). The study report will cover it, and it's left for the authority to decide. Thanks for the valuable information and comments you provided.

Once again, your comments is well noted.

Question 2.



Tanaka Muradzikwa

to me

[Hide details](#)

From: Tanaka Muradzikwa
tanakamuradzikwa@gmail.com

To: info.advanceenviroment@gmail.com

Date: Apr 11, 2024, 7:45 PM

[View security details](#)

To whom it may concern

Dear Sir/Madam,

I am writing to formally register as an Interested and Affected Party regarding the proposed development of a lodge within the Buffalo Core Area of Bwabwata National Park, situated in the Kavango East Region.

My concern stems from the potential impact of this lodge on the delicate ecosystem of Bwabwata National Park, particularly within the Buffalo Core Area. The proposed development contradicts the Tourism Development Plan for Bwabwata National Park, which was previously approved by the Ministry of Environment,

Response to question 2

Dear Tanaka,

Your email is well received, and concerns registered are noted and will be address in the EIA report. Please take note that, the Ministry of Environment, Forestry and Tourism are the custodian/authority of the land in question. The proposed activity in the buffalo core area is a listed activity as per the Environmental Management Act of 2007. The role of EAP is to put mitigation measures in place to avoid the negative impact to the environment, and this is addressed during the stakehgolders meeting and through email communications.

The EAP would like to assure you that, the Ministries competant staff will have done a study prior to, them putting out the site on tender for the development of the tourism facilities.

Secondly, this project is introduced for the benefit of the local community at large, in simple terms, the rights are given to the community, whereas the operation is managed by an private investor.

Kind regards,

EAP,

Question 3.

Dear Advance Environmental Services,

Please register Shamvura Camp as an interested and affected party for the development of a private lodge in the Buffalo Core area. We would lose business because we do specialized guiding trips into this area and being denied access would cause a decline in bookings.

The same would apply to all the lodges in the Divundu catchment area, who all depend on Game Drives and access to both Mahango and Buffalo Core areas. If they are denied access to these areas with their tourists they will all lose business, staff would be retrenched due to lack of bookings, revenue for the entire area would become less which would be detrimental to the entire Divundu business sector. Booking agents who book these lodges would also lose business because one or two relatively small private exclusive lodges would not be able to manage all the bookings that currently use the lodges and camps in the area.

Here is a list of some the lodges and camps that would be affected.

Mahangu Safari Lodge

Ndhovu Safari Lodge

Ngepi Camp

Nunda River Lodge

Rainbow Lodge

Divava Lodge and Spar

Shametu River Lodge

Popa Falls Rest Camp (NWR)

White Sands Lodge and Camping

Divundu Guesthouse

Tembo Lodge (although I believe this might be the concession holder for Buffalo

RiverDance Lodge

Mobola Lodge

Further upstream there are lodges who also offer game drives to Buffalo and Mahango Core areas

Ndurokoro Camp and Chalets

Kuvira River Camp

Shamvura Camp

Kayova River Lodge

Shankara Rest Camp

Murambo River Lodge

Mukuku RestCamp

If required I can supply you with email addresses and contact information for most of these lodges if you need to contact them as Interested and Affected parties.

Response to Question 3 the Concern above, 16 April 2024

Dear Sir/Madam,

Thank you for your concern raised in the above email, on behalf of the proponent allow me to clarify your concerns as follows below;

The proponent responded to an advert placed in the news paper by MEFT dated 08 November 2023 and his company became the successful bidder in the Kavango South Concession (Buffalo Military ruins Area).

Your concern regarding the access is not a case in this development, the access to the park will remain, however, access to the designated site for the lodge will not be allowed. We take note of your concerns and the effect this development might cause to the existing development.

Please take note that, this development is in partnership with the hambukushu community at large and will have an enormous benefit to the community such as job creation, community projects and a fixed community fee of not less than 1m per annum guaranteed for community developments over a period of 25 year, with a proposed amount of N\$ 51 409 254, 61 based on net revenue to be benefited by the community. Over and above that, communities are to benefit under social development of over 100k for social development.

For detail on the project, you are free to consult with MEFT-Concession Unit.

Kind regard

Practitioner

Question 4

[14:22, 20/06/2024] Albertin: n your advertisement your email address you forgot the n in environment you have enviroment. So many people who might have wanted to comment will no longer bother. I am suggesting if I may, you may need to re-advertise & extend the deadline the 21st April

[14:22, 20/06/2024] Albertin: Oh okay well that one without the n seems to be the one not going through either

[14:22, 20/06/2024] Albertin: What a back and forth thing this is the correct email address apparently info.advanceenviroment@gmail.com

[14:22, 20/06/2024] Albertin: Is this correct

[14:22, 20/06/2024] Albertin: Also a lot of people are complaining on our Divindu group that the emails keep bouncing back

[14:22, 20/06/2024] Albertin: Please be kind enough to send me an email to shamvura@iway.na so I reply to that

[14:22, 20/06/2024] Albertin: Also yo the Kavango Open Africa Route sent by the Divubdu Lodges Cluster through their lawyer Mr van Vuuren

[14:22, 20/06/2024] Albertin: My email address was ottie.pax@gmail.com

[14:22, 20/06/2024] Albertin: Afternoon we have still not received an email in response to being registered as an affected & interested party. Please advise

[14:22, 20/06/2024] Albertin: Do you have the RAMSAR document for the Bebwatwa area, it is quite recent, signed by the Minister. Also the MEFT landuse plan plus the Management Plan

[14:22, 20/06/2024] Albertin: I can email them to you. The RAMSAR is quite clear that no private tourism lodges should be built inside core areas of the Park

Response to above communication

Madame we are consultants appointed by the proponent. what we do is write the EIA in accordance to the EMA Act of 2007 and the decisions will be done by meft. am sure they have all the information you telling me is included and the right decision will be taken.

Albertin: Hope so but to assist you I will try to forward the relevant documents to you. It might be useful to you

Albertin: I registered as an affected & interested party. You confirmed you got my email. I never heard anything further from you nothing about questions & answers. There was no public meeting that anyone could attend to discuss this

Response to above concern

Albertin:

The site meeting was called, and the date set as per our advert, at Divundu guesthouse. None of the parties being referred to showed up, the BID document and the draft report was with the MEFT and Mukwe Regional office for ease of access to read by all parties.

Albertin: furthermore, the Ministry of Environment, Forestry and Tourism (MEFT) is the custodian of the land (Park "Bwabwata NP"). The site was put out through public tender notice by MEFT. EIA will address all concerns raised by yourself and other concern parties,

Albertin: Morning, I am still waiting for the BID (Background Information Document) please email it to ottie.pax@gmail.com. thank you

Response (BID send)

Dear Ottie,

Attached find the BID, as per your request. Take note that you requested this information way after the closing date for comments.

For transparency, and in general responding to the above questions again.

It's the said Ministry (MEFT) that put out the tender for public participation of interest businesses to take part in the tender to built operate and transfer (BOT) the tourism concession in the area.

The concession is of great importance value to the Hambukushu community who for decades or centuries never benefited from any tourism product or business in the area despite the coexistence with wildlife.

The value of the tourism concession is guaranteed above 50ml over a period of 25 year.

Regards

Response

Thank you the Buffalo area would benefit the Khew people under the Karamachan & not the Hambukushu people. It also threatens the RAMSAR status of the core area of Bwabwata National Park. It is very clear in the RAMSAR document signed by the Minister of MEFT that there are no tourism developments inside the Park. In addition to this this lodge will never bring in the revenue that the 12 lodges that offer over 300 beds for tourism who depend on game drives inside the Buffalo Core area. This exclusive lodge threatens that economic benefit to the area. One small exclusive lodge in Buffalo will be detrimental to the whole tourism industry in that area. Your EIA process was not done properly there was no public meeting in the area that invited all interested parties & the public. No BID was ever sent.

Response

As earlier indicated, the BID document, Scoping report were left at the Constituency office and MEFT for ease of access to all A&I parties.

Concerns contue

The Hambukushu people are mainly employed by the 12 lodges in that area & the tribal authority is also paid by these 12 lodges. Your EIA is misleading, because at the end of the day it is the very Hambukushu people currently employed by these 12 lodges servicing over 300 beds who will lose their jobs. The small Buffalo lodge is short sighted & again threatens the RAMSAR status of the area. These are important factors your EIA should have noted with concern. You must look at the bigger picture not just the one development on the Karamchean side of the river.

Also the riuns are a historic site

Had you held the public meeting & sent the BID as you are supposed to, then these concerns & objections would have been well noted with the 30 days, instead of trying to sneak a EIA through that has not followed due process

You should have sent me the BID on the 14th when we registered as an interested & affected party

Therefore I will send a request to the Environmental Services because you did not follow due process doing this EIA. The fact that you state this will benefit the Hambukushu people and not the Karamachan is proof you did not do proper research

Thank you I will forward it to Environmental services to show them you did not do an adequate EIA

Dear Oattie,

All what the EIA practioner is doing is to look at impact of the envisage development (Environmental aspect, social and economical). It is therefore that we have all comments taken and will be incorporated into the EIA report. It's thereafter the Environmental Commissioners to make an informed decision to either issue the ECC or not.

I believe you are protecting your business and none said the lodges including your has not supported the community. This is a community project advertised for operator to lease the rights and manage the business on their behalf of the community.

My previous statement does not refer to the lodges but refers to the existing of the park that did not benefit the Hambukushu Community.

Once again, your comments will be part of the final EIA report.

I believe, this clarify the concern. I have no reason to conceal or sneak the EIA through.

Kind regards

Response continue

The due process was followed and that is why you, and any other affected parties have picked up the EIA notice.

Concern continue

Did you hold a public meeting & you did not send me the BID in time for me to list the concerns & any objections. This applies to me as a guide but also the 12 lodges in the Divundu, Kamutonga & Mukwe area. All of whom support tye Hambukushu people. Especially by offering employment. 1 small lodge wil never earn enough income to compensate for 300+ beds supplied to the industry that these 12 lodges supply. So your EIA did not research the long term economic impact that loss of business to these 12 lodges will occur because they will lose bookings if they may not take their guests to the Bwabwata ruins, old graves & do game drives in the Buffalo area. The Eastern side of the Kavango River falls under the Karamachan the Khwe people. It is not for the Hambukushu people. I do believe that the Katamachan (Khwe people) in Bwabwata only benefit from the hinting concessions. They do not really benefit much from tourism. They are employed by White Sands

Many of the lodges do support communities for example I do livelihoods in the form of developing, marketing local hand crafts, I support over 1000 baskets weavers. Other lodges support schools, nursery schools & local churches. Many of the Divindu lodges support the Karamachan museum. So it is incorrect to state the lodges fo not support the local community. The Hambukushu traditional authority is also paid by all the lodges. So that needs to be adjusted. Should these lodges lose business because of private concessions inside the core areas. Then the loss of jobs will be staggering which will seriously impact the local Hambukushu people & the economy of that entire area. 3 local people are employed per bed in the tourism industry. This is an available HAN statistic. So 900 jobs are in jeopardy should these exclusive private tourism concessions go ahead. Besides it will also threaten the RAMSAR status. Which is an internationally recognized status.

*hunting not hinting

So yes the 12 lodges are protecting the overall tourism industry in this area.

Response

All points are noted,

As earlier indicated, the study does not state that the lodges in the area does not support the community. It's referring to the national parks , namely the two areas of Buffalo and mahango core areas. This areas are seen as island with no benefit to community's living adjacent too or within.

Secondly, the exclusivity does not apply to the entire park access but only to the site demarcated for development of the lodge.

Lodges outside with your clients, and self-drive clients will still have access to the park . The existing of this lodge will not limit or neither stop the other lodges and srif-drive clients from the park.

With regards to the RAMSAR , it is noted and I believe it is as well known by the authority (MEFT). The study report will cover it, and it's left for the authority to decide. Thanks for the valuable information and comments you provided.

Once again, your comments is well noted.