

ENVIRONMENTAL MANAGEMENT PLAN

ONGAVA HAI//OM LODGE AND ETOSHA SOUTH TRAVERSING CONCESSION

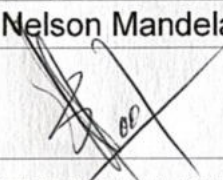
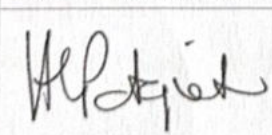


Prepared for Ongava Hai//om Tourism (Pty) Ltd as part of the EIA process and application for Environmental Clearance

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ECC APPLICATION: 4740

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Disclaimer

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TABLE OF CONTENTS

ABBREVIATIONS.....	1
1 INTRODUCTION.....	2
1.1 This document	3
1.2 Aims of the EMP.....	3
1.3 Permits and licences	3
2 PROJECT OVERVIEW	5
2.1 Tourist activities	5
2.2 Infrastructure in Etosha National Park	5
2.3 Infrastructure on the JV concession	5
2.4 Services	6
2.5 Local community involvement.....	7
3 IMPLEMENTATION	8
3.1 Training	8
3.2 Compliance	8
3.3 Consequences of non-compliance	8
3.4 Contractual obligations.....	9
4 MANAGEMENT ACTIONS	10
4.1 Planning and construction phase.....	12
4.2 Operational phase.....	20
4.3 Closure and decommissioning	27
4.4 Heritage chance find procedure	28
4.5 Social plan	29
4.6 Road and soil management plan	29
4.6.1 Road plan	30
4.6.2 Road management.....	31
4.6.3 Terms used in Table 5.....	33
5 MONITORING.....	35
5.1 Water monitoring	35
5.2 Biodiversity monitoring.....	35
6 CONCLUSIONS AND RECOMMENDATIONS.....	36
APPENDIX I. CORPORATE SOCIAL PLAN	I
APPENDIX II. GUIDING PROTOCOL	I

TABLE OF FIGURES

Figure 1. Location of the JV concession and the Etosha South Traversing Concession.	2
Figure 2. Proposed road network	30
Figure 3. Soil sensitivity map (image: Dr Nortjé)	31

LIST OF TABLES

Table 1. Permits required for the project.....	3
Table 2. Responsible individuals and teams.	10
Table 3. Management actions for the construction phase.	12
Table 4. Management actions for the operational phase.	20
Table 5. Decommissioning plan at concept level.	27
Table 6. Heritage chance find procedure	29
Table 7. Road categories for the Ongava Hai//om Concession.....	33
Table 8. Biodiversity aspects that need to be monitored	35

ABBREVIATIONS

Abbreviations used in this report.

Association	!Gobaub Hai//om Tourist Association
COC	Concession Operator Contract
EAP	Environmental Assessment Practitioner
EAPAN	Environmental Assessment Professionals of Namibia
ECC	Environmental Clearance Certificate
EIA	Environmental Impact Assessment
EMA	Environmental Management Act
EMP	Environmental Management Plan
ENP	Etosha National Park
GG	Government Gazette
Hai//om Association	!Gobaub Hai//om Community Association
GN	Government Notice
HCC	Head Concession Contract
HIA	Heritage Impact Assessment
HIV/AIDS	Human Immunodeficiency Virus/Acquired Immunodeficiency Syndrome
I&APs	Interested and Affected Parties
IUCN	International Union for Conservation of Nature
IRR	Issues and Response Register
JMC	Joint Management Committee
JV	Joint Venture
MAWF	Ministry of Agriculture, Water and Land Reform
MEFT	Ministry of Environment, Forestry and Tourism
NHC	National Heritage Council
OHT	Ongava Hai//om Tourism (Pty) Ltd
Regulations	Environmental Impact Assessment Regulations, GN 30 of 2012

1 INTRODUCTION

The construction and operation of a tourist lodge is a listed activity that requires Environmental Clearance from the Ministry of Environment, Forestry and Tourism (MEFT). The proponent, Ongava Hai//om Tourism (Pty) Ltd (OHT), plans to build and operate a 24-bed eco-lodge with 70 - 80 permanent employees on the !Gobaub Hai//om Tourism Activity and Traversing Concession in and adjacent to Etosha National Park (ENP) (Figure 1).

The proposed project is a Joint Venture (JV) with the !Gobaub Hai//om Community Association (Hai//om Association) on two combined concessions: the Etosha South Traversing Concession Area (pink in Figure 1) and the Joint Venture Traversing Concession Area (blue in Figure 1), jointly referred to as the !Gobaub Hai//om Tourism Activity and Traversing Concession (the Concession). A Joint Venture Management Committee (JMC) consisting of representatives from the Hai//om Association, OHT and MEFT will oversee the venture and be ultimately responsible for implementing the measures in this EMP.

The development is regulated by a Head Concession Contract (HCC) between the Ministry of Environment, Forestry and Tourism (MEFT) and the Hai//om Association, as well as a Concession Operator Contract (COC) between the Hai//om Association and OHT.

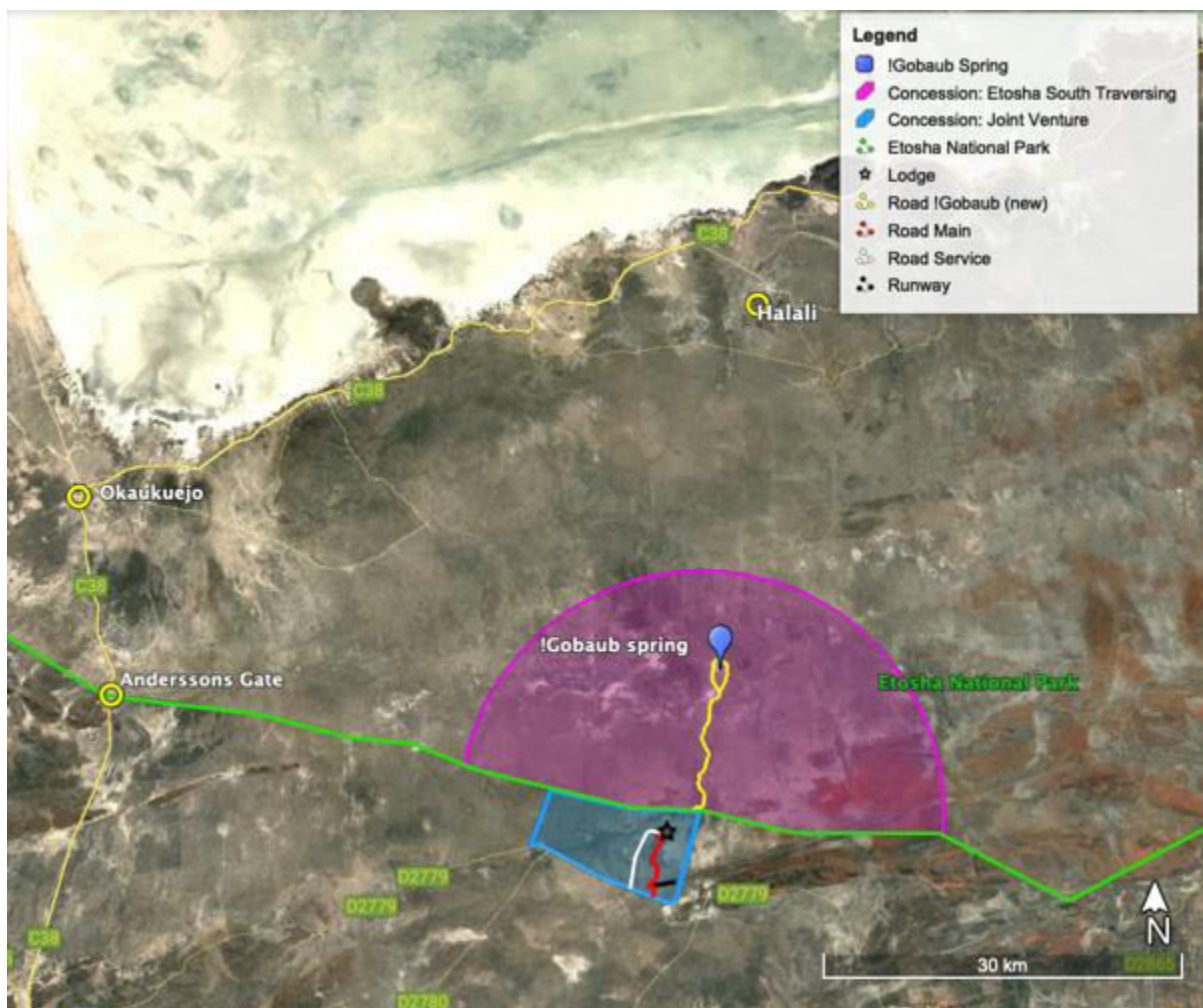


Figure 1. Location of the JV concession and the Etosha South Traversing Concession.

1.1 This document

This EMP is part of a scoping level Environmental Impact Assessment (EIA) and is submitted to MEFT in support of an application for an Environmental Clearance Certificate (ECC). It was compiled in accordance with the Environmental Management Act (7 of 2007) (EMA), the EIA Regulations of 2012, and provisions in the HCC and COC.

A Scoping study with impact assessment was conducted for this project and found no highly significant impacts that cannot be prevented and/or mitigated to a low significance. The potential impacts identified in the Scoping Report are listed in this EMP together with prevention and/or management actions.

This EMP deals with the planning, construction and operational phases of the development. Decommissioning has not been addressed in this EMP, but the risks and management actions would be similar to those of the construction phase.

1.2 Aims of the EMP

The Environmental Management Plan (EMP) has two main aims:

- propose measures to prevent or mitigate any potential negative impacts, and enhance positive impacts that were identified in the Scoping report (with impact assessment)
- detail the actions required to carry out the proposed mitigation measures

The EMP demonstrates the commitment of Ongava Hai//om Tourism to follow current best practices for sustainable tourism, and it forms an environmental contract between Ongava Hai//om Tourism and the Government of the Republic of Namibia in its capacity as guardian of the country's natural resources.

The EMP is a living document that will be updated as new information, policies, authority guidelines and technologies develop.

1.3 Permits and licences

The proponent will obtain all permits, licences and registration that are required for the project, and keep them up to date. Table 1 lists some of the applicable permits. A Consent from the National Heritage Council was obtained as part of the scoping process.

Table 1. Permits required for the project

Permit/Licence	Authority	Relevance
Licence to abstract and use water, Form WA03-GW	MAWLR	Except for personal, domestic use, all abstraction and use of water requires a permit. Section 44-45 of the Water Resources Management Act (2013) and Sections 44-45 of the Water Resources Management Regulations (2023).
Effluent discharge, Form WA07	MAWLR	Sewerage systems and effluent discharge are regulated by a permit in accordance with Sections 66-68 of the Water Resources Management Regulations (2023).
Clearing of land	MEFT	The Forest Act 12 of 2001 stipulates a permit for

Permit/Licence	Authority	Relevance
		the removal of any protected plant species.
Consumer Installation Certificate, Form PP/5	MME	The storage of more than 600 litres of fuel in a rural area, for personal use only. The Petroleum Products Regulations (2000).
Permission for shifts and leave schedules	Ministry of Labour, Industrial Relations and Employment Creation	The Labour Act 11 of 2007 limits shift length and number of consecutive workdays. E.g. 12-hour shifts and leave schedules of 3 weeks on, 1 week off require written permission.

2 PROJECT OVERVIEW

The lodge infrastructure, roads and support systems are described in detail in the Scoping Report that accompanies this EMP.

2.1 Tourist activities

The following activities will be offered to OHT guests:

- Game drives in the Etosha South Traversing Concession. The proponent has exclusive access to this concession, and no guides from any other operation, including NWR guides from Okaukeujo, Halali, Namutoni or Onkoshi lodge, will be permitted to enter the Etosha South Traversing Concession or approach the !Gobaub spring or use the facilities. OHT guides on game drive may visit any ENP public access areas and transit through the Park.
- Game drives on the JV concession
- Guided hikes on the JV concession
- Spa treatments

2.2 Infrastructure in Etosha National Park

Road upgrade

The existing road to !Gobaub will be upgraded to a Category A road with an all-weather surface (Table 7) and will be maintained by the proponent. The current track runs through ephemeral pans (a sensitive habitat, discussed in Section **Error! Reference source not found.**) and is badly eroded and water-logged in those locations. The upgrade operation will avoid this sensitive habitat type.

Game viewing hide upgrade

The current game viewing hide at !Gobaub will be upgraded, ensuring ENP personnel continue to have access to it for research, game counts, and other operational reasons while bringing it to a standard that is suitable for the tourist market. A toilet and sewerage system will be installed above ground, and sewage and solid waste will be removed from ENP to the depot at the workshop complex on the JV concession.

Gate infrastructure

As stipulated by the COC, the gate between Werda and ENP will have 3 offices, 3 en suite bedrooms and a kitchen for officials from ENP, the Namibian Police Force and the Directorate of Veterinary Services.

Electricity will be supplied by solar panels, and a BIOROCK wastewater treatment system will manage sewage. It will have a capacity of 3,000 litres and combines primary, secondary, and tertiary treatment stages. The system uses a septic tank for initial treatment, followed by aerobic digestion and then advanced filtration. The resulting effluent will meet the standards set by the Department of Water Affairs and will be discharged into a fenced and vegetated evaporation pond.

2.3 Infrastructure on the JV concession

The total footprint of the project, including experience centre, staff village and support infrastructure will be 13,400 m².

The main area will have a reception, lounge, sitting and dining areas, bar, library, wine cellar, washrooms, boma, pool with deck, storage and lounge. A waterhole and game viewing hide will be erected in front of the main area. The back of house will contain a kitchen, pass, scullery, walk-in fridge and freezer rooms, offices, storerooms, a staff dining area and two staff washrooms.

The 10 guest rooms will be freestanding, mounted on platforms, and consist of a sitting area, bedroom, bathroom, veranda, plunge pool and outdoor shower. Professional guides/pilots will be accommodated in 6 freestanding single rooms, each with a bathroom and veranda.

Approximately 1,5 km away from the main area will be a guest experience centre with curio shop, lounge, spa, gym, storage, small kitchen, display area, boardroom and training facilities.

The project will have 70 – 80 permanent employees, accommodated in a staff village with 60 en suite single rooms, 10 en suite flats for senior staff, 2 trainee dormitories, a kitchen, dining area and outdoor entertainment area including a gym, swimming pool and synthetic turf sports field.

A workshop for vehicle and general maintenance will be located near the staff village. It will contain a workshop, storerooms, laundry, offices, solid waste depot, car parking.

An airstrip will be constructed with a 1.3 km x 60 m runway, a turning pad on each side and a helipad.

2.4 Services

Water for the lodge operation will be supplied from boreholes on Werda, fitted with submersible low-volume solar powered pumps. Water will be pumped from the boreholes to six 10,000 litre holding tanks from where it will be pumped to the lodge and water outlets.

A comprehensive wastewater treatment system for the lodge and experience centre combines a decentralized, non-electric system with primary, secondary, and tertiary treatment stages. The system uses a septic tank for initial treatment, followed by aerobic digestion and advanced filtration to produce effluent that meets high environmental standards. Effluent will be used for road maintenance, irrigation of the lodge garden, and dust suppression. Any remaining grey water will be discharged into vegetated evaporation ponds. It is a low maintenance system that requires periodic inspections and occasional septic tank desludging to ensure reliability.

The staff village, workshop complex, airstrip and ENP gate will each have a separate sewage treatment plant and effluent will be discharged into vegetated evaporation ponds.

Solid waste will be taken to an animal- and wind-proof sorting and temporary storage depot at the workshop complex. An enclosed incinerator in the workshop complex will burn a minimum amount of packaging material such as dirty cardboard boxes. Organic waste will be donated to surrounding farms as livestock feed or reused as compost in the vegetable

garden. Recyclable waste will be transported to a recycling facility in Windhoek on empty delivery vehicles.

Four separate photovoltaic (PV) systems will provide all the energy for the project. PV panels will be mounted either on roofs, where they will contribute to passive cooling of the rooms underneath, or used for shaded parking areas. Where no shading is required, the panel frames will be installed on metal structures. The lodge, guest experience centre, and staff village will each have a generator to be used only as a backup, e.g. during prolonged overcast periods. Geysers will be solar and cooking will be done on gas stoves.

Fuel will be stored in the workshop complex in above-ground tanks with a combined total capacity of 20,000 litres on an impermeable and bunded concrete floor. Refuelling will be done on an impermeable and bunded concrete floor that is large enough to park a vehicle and located adjacent to the fuel tanks, eliminating any potential for accidental spillage to reach the soil.

The access roads and game drive routes were designed by a soil scientist considering soil, topographical, hydrological, archaeological, wildlife and vegetation, and his road management plan is given in Section 4.6. Professional contractors will do annual road maintenance, while the lodge maintenance team will perform erosion prevention and ad hoc maintenance.

2.5 Local community involvement

The Hai//om community is an equity shareholder through the Hai//om Association and the Traditional Authority that each owns 8% shares in OHT. The community also has a voice in the management of the concession and monitoring of the EMP via the JMC that consists of equal representation of the Hai//om Association, the proponent, and MEFT.

A Corporate Social Plan was submitted by the proponent during the tender process, and they are contractually bound by this plan (APPENDIX I).

3 IMPLEMENTATION

OHT is responsible for the day-to-day implementation of this EMP. All contractors, subcontractors, visitors and staff must be made aware of the contents of the EMP and their roles in following it.

3.1 Training

Appropriate training, education and experience for the tasks that are expected of employees will result in competence of the workforce. All employees will receive induction training upon arrival on site, and the manager on site will keep a register of completed training.

A site induction should contain at least the following components:

- Definitions of “environment”, “social”, “impact”, etc. in language that is understandable by the trainees
- The risks and potential impacts associated with the project
- How can risks and impacts be minimised
- Environmental rules of the project
- The roles and responsibilities of the trainee in relation to the environment and this EMP
- Procedures to follow in the event of an environmental issue
- The consequences of non-compliance, including the possibility that the ECC may be withdrawn, and the project forced to close.

3.2 Compliance

- OHT will avoid or minimise potential impacts on the by complying with the guidelines in this EMP.
- Immediate action will be taken if EMP measures are not followed.
- All required environmental authorisations, permits and licences have been obtained; their stipulations are implemented; and renewal will be done before expiry.
- Contractors and new employees will be informed of the high value placed on the environment and will be aware of the measures in the EMP and their responsibility in carrying out those measures.

3.3 Consequences of non-compliance

This EMP is a legally binding document. The consequences of non-compliance will be stipulated in every employment contract as well as in contracts with contractors and subcontractors and will include but are not limited to:

- Fines and penalties to the contractor
- Legal action
- Cancellation of contract
- Suspension of work
- Disciplinary action if the perpetrator is a lodge employee
- Withdrawal of ECC

3.4 Contractual obligations

The proposed project is regulated by two contracts, the HCC and COC. The HCC takes precedence in the event of discrepancies. The JMC, consisting of a representative of the Hai//om Association, OHT and MEFT each and meeting quarterly, will monitor compliance with these contracts and the EMP.

Environmental Control Officer

According to the HCC (section 7.12) the proponent is obliged to appoint an independent environmental control officer with the following responsibilities:

- Ensure compliance with relevant environmental regulations
- Ensure compliance with this EMP
- Monitor the effectiveness of mitigation measures set out in this EMP
- Ensure that impacts are prevented and/or managed.
- Regular inspections of the construction site and operational areas
- Promote environmental awareness among the contractors and their staff, and project employees
- Request the removal of people and/or machinery that do not comply with the EMP

The proponent should deliver monthly reports to MEFT during the construction phase, and thereafter annually. An annual EMP audit report shall be prepared by an independent environmental consultant.

Modifications during concession period

Should the proponent require modifications to any part of the Concession, it shall be preceded by an EIA and EMP and it shall be subject to the provisions in the HCC and COC.

4 MANAGEMENT ACTIONS

Nature of impact

Description of potential risk sources (impacting activities) and the mechanisms through which an impact may occur are described.

Management

Management measures are proposed for each identified impact. These measures take the form of specific management actions that aim to avoid, minimise or remedy negative impacts, together with adjustments to respond to unforeseen impacts.

Responsibility

Successful implementation of an EMP relies on defined roles and responsibilities. OHT has allocated duties to individuals and teams (Table 2), and they are responsible for carrying out the management actions listed in the column *Mitigation*.

Table 2. Responsible individuals and teams.

Person/Team	Responsibilities
Managing Director (MD)	Overall responsibility for implementation of EMP. Support to lodge staff for implementation of environmental management measures. Provide financial and technical resources for the project and implementation of the EMP.
General Manager (GM)	Ensure compliance with this EMP. Overall management of lodge and activities. Supervision of all lodge staff, including the maintenance team and guides. Provide training, supervision and equipment to employees so they are able to fulfil their tasks. Keep a register of employees and contractor staff who completed site induction. Notify the relevant authorities in the event of a serious environmental incident. Ensure employees and contractors understand and comply with this EMP. Keep record of environmental complaints and responses from the community, public and authorities.
Maintenance team (Maint)	Maintenance of buildings, vehicles, machinery, sewerage and solid waste systems. Monitor equipment and machinery for leaks, damage and general wear and tear. Report damage to the General Manager.
Guides	Transport of guests. Appropriate human-wildlife interactions. Record sightings of endangered species. Ensure implementation of EMP while out and about with guests. Ensure adherence to the Guiding Protocol. Report any signs of transgressions to the General Manager.
Contractors	Ensure all their staff are familiar with the provisions in this EMP and how they pertain to each employee's tasks. Implement the measures in this EMP. Adhere to any relevant statutory and legal requirements. Report environmental incidents to the General Manager. Identify potential risks and report them to the General Manager

Tools

This column refers to actions, equipment, procedures, protocols and guidelines that enable the application of the management actions.

4.1 Planning and construction phase

OHT will inform all contractors in writing about the requirements of this EMP and of the management measures that the contractor will be expected to implement. Site induction training will be given to contractors and all their workers, ensuring they are aware of the measures in this EMP, the impacts associated with their activities, and the consequences of non-compliance. ENP management will be consulted during the planning and construction phase and their direction will be followed regarding any activities in the Park.

Once construction starts, OHT will inspect the site daily to ensure compliance by the contractor, sub-contractors and their employees. A final inspection will be done upon completion of construction and before signing off on the project to ensure that the contractor has satisfied all the requirements in this EMP.

Building materials will be stored in a central construction yard close to the public road and from there will be further distributed to the various sites with smaller trucks. Electric conduits, water pipes, and sewerage pipes will be installed in trenches in the ground at the staff village and airstrip. Most electric conduits, water pipes, and sewerage will be suspended below the raised walkways at the main lodge. This allows for easy access and reduces visual disturbance on site.

Earthmoving machinery will be used during construction, but its use will be controlled to prevent unnecessary harm to the soil and topography. An experienced civil contractor will construct roads according to the road and soil management plan presented in Section 4.6.

Duration of the construction phase is estimated at 24 months and will start as soon as the ECC is issued.

Table 3. Management actions for the construction phase.

NATURE OF IMPACT	MANAGEMENT	RESPONSIBILITY	TOOLS/MONITORING
1. Soil resources and land capability			
Erosion, compaction of and damage to soils. Off-road driving damages the structure of the soil surface and causes soil compaction, which results in less water infiltration and availability, limited root penetration and less vegetation cover. Damaged soil crust	Motorised access will be limited to existing tracks and defined development areas. As far as possible, no new roads or tracks should be developed within the lodge or staff village areas. Speed limit is 40 km/h.	GM. Contractor ENP	Visual inspections
	No construction or activities within areas containing highly erodible dispersed, fine-particle, sodic soils.	GM. Contractor ENP	Identify highly erodible soils and areas before construction starts. Avoid these areas.

NATURE OF IMPACT	MANAGEMENT	RESPONSIBILITY	TOOLS/MONITORING
makes the fine underlayer of soil vulnerable to wind erosion, the resulting dust settles on plants, interferes with photosynthesis, and causes a decline in habitat quality.	Prevent water runoff from concentrating unnaturally in any one area.	Contractor	Road building and maintenance plan
	No off-road driving should be allowed. Where it is unavoidable, the resulting tracks must be obliterated by sweeping them. Regular road maintenance, erosion control and good drainage will prevent the need for off-road driving.	GM. Contractor	Road building and maintenance plan
	Water pipes shall be installed and trenches dug in such a way as to minimise the chance of erosion.	Contractor	Site inspections
	The boundaries of construction sites that extend beyond already impacted areas must be clearly demarcated. Where construction will take place within or close to sensitive features, these should be demarcated.	GM. Contractor	Demarcation of construction areas. Demarcation of sites of particular sensitivity with "Do not Disturb" signs.
	No construction activities may take place outside the defined infrastructure footprint areas.	Contractor ENP	Site plans to clearly define construction areas.
	Quarries/borrow pits may not be dug without formal permission.	GM. Contractor ENP	Approval. Demarcate sources.
	The movement of construction crew must be within the demarcated site boundaries at all times.	GM. Contractor ENP	Site boundary demarcation.
	An area for mixing and stockpiling construction material must be demarcated. It must be located in an area that is already disturbed, or where development will take place.	GM. Contractor ENP	Selection of laydown area. Demarcate area.
	Access routes between the stockpiling areas and the building sites should be demarcated and their use enforced. Existing roads must be used.	GM. Contractor ENP	Clearly demarcated routes.
	Sand and rocks utilised for construction must be from defined and already impacted areas. These sites must be identified and approved by the GM.	GM. Contractor ENP	Approval. Demarcate sources.
	Once construction work is completed, all building material and rubbish must be removed from the Concession (including ENP) and the construction sites must be rehabilitated to a state as close as possible to its pre-construction condition.	Contractor enp	Site inspections
	The use of graders should be avoided because they gouge roads	GM. Contractor	Site inspections

NATURE OF IMPACT	MANAGEMENT	RESPONSIBILITY	TOOLS/MONITORING
	below the level of the surrounding surface.		
Soil is contaminated by cement, paint, thinners, hydrocarbons and other chemicals used in the construction process	The mixing and use of concrete and cement must take place in defined, designated areas only.	Contractor	Designated mixing areas.
	All hydrocarbons and chemicals must be stored, handled and dispensed on and over an impermeable surface.	Contractor	Lined and bunded storage areas.
	Any spillage must be contained and cleaned up within 24hrs of occurrence. The resulting waste must be sealed in an appropriate container and taken off site for disposal.	Contractor enp	Spill kits. Drums with sealable lids.
2. Topography			
Significant alterations to the shape of the landscape	Site levelling and landscaping only where required by the designs.	MD Contractor	Approval from MD
	Construction site office and facilities to be dismantled and removed once construction is completed	Contractor	Site inspection
3. Biodiversity			
Mortality of amphibians, reptiles, birds, mammals. Snakes are particularly vulnerable because they are usually killed on sight. Disturbance of individual animals in their daily foraging and movement.	Avoid any nests, burrows, dens and roosting sites.	GM. Contractor ENP	Identify sites with nests, burrows, dens. Demarcation of sensitive sites.
	Educate contractor and staff to avoid sensitive sites.		Induction
	Venomous snakes should be removed by a specialist, and other snakes should be avoided. Educate staff in the ecological value of snakes and how to avoid them.		Induction
	Speed limit of 40 km/hr in ENP. Activities inside ENP will take place only between the permitted entrance and exit times.		Induction
Poaching of wildlife. Tortoises and small mammals are particularly vulnerable.	The greater area around building sites should be searched for snares during the construction phase and after construction is complete.	GM. Contractor	Site inspections
	Restriction of contractor staff movement.	Contractor	Site inspections
	Inspection of contractor staff housing to check for animal parts and/or products.	Contractor	Site inspections
Damage to or removal of protected species of fauna and flora	Identify and demarcate sensitive sites. Declare them no-go zones.	GM. Contractor	Identify and demarcate
	Education of contractor and staff.		Environmental management contract. Induction

NATURE OF IMPACT	MANAGEMENT	RESPONSIBILITY	TOOLS/ MONITORING
	Continuous monitoring to ensure that no protected species are affected.		Site inspections
Damage to vegetation, leading to a loss of habitat integrity and disruption of ecosystem functions	Motorised access should be limited to existing tracks and defined development areas. Road construction takes place within a corridor of less than 16 metres wide.	All	Road management plan. Site inspections
	No off-road driving is allowed under any circumstances.	All	Site inspections
	Ensure that only permitted access roads and paths are used by construction workers and vehicles at all times. A low speed limit, water and other dust-suppression methods must be implemented.	GM. Contractor	Site inspections
	No firewood may be collected.	GM. Contractor	Site inspections
	Remove and relocate all protected species with a good relocation/survival potential – e.g., <i>Aloe</i> spp., <i>Adenium boehmianum</i> , etc. – and include as part of the indigenous landscaping	GM	Site inspections
	Avoid damage to and destruction of mature, protected trees e.g. <i>Colophospermum mopane</i> and <i>Combretum imberbe</i>	GM	Site inspections
	Establish a nursery of endemic and protected species, for rehabilitation purposes	GM	Site inspections
	Prevent destruction of karst hills/ridges/outcrops	GM	Site inspections
	Prevent destruction of ephemeral pan habitats	GM	Site inspections
	Prevent poaching (e.g., illegal collecting of unique flora such as <i>Aloe</i> spp. and <i>Adenium boehmianum</i>).	GM	Site inspections
	Carry out regular inspections of the staff village and staff transport, looking for poached plants or animal parts.	GM	Site inspections
	Rehabilitate laydown areas, temporary construction facilities and construction tracks	GM	Site inspections
	Use only indigenous flora species as part of the landscaping at the various development sites	GM	Site inspections
	Areas dominated by <i>Dichrostachys cinerea</i> (sicklebush) should not be disturbed mechanically to avoid the area becoming even more dense	GM	Site inspections
	Do not use chemicals to clear fence lines and airstrip area of	GM	Site inspections

NATURE OF IMPACT	MANAGEMENT	RESPONSIBILITY	TOOLS/MONITORING
	vegetation as these could affect adjacent areas		
Invasive vegetation causes a decline in habitat quality	Construction materials must be free from seedlings and seeds of alien and invasive vegetation.	Contractor	Inspection of deliveries and laydown areas
Landscape disturbance from construction activities	Upon closure of construction, site must be rehabilitated using only indigenous vegetation.	Contractor	Inspection and sign-off by proponent
Positive impact: increased security for rhinos	The proponent and MEFT will agree on a rhino security protocol that will remain confidential and not available to the public.	MD, GM, ENP, MEFT Rhino Coordinator	Security protocol
4. Hydrology			
Erosion of river banks, washes and drainages	Rivers to be entered and exited using only existing approaches and entrance/exit points. See impact 1.	All	Mark entry and exit points.
Surface and groundwater contamination	The mixing and use of concrete and cement must only take place in designated areas so as not to contaminate the sites in any way.	Contractor	Identify and prepare mixing sites.
	No construction activities may take place within 1:100 year floodline of any watercourse or within 50m of a spring.	All	Site inspections.
	Hydrocarbons and chemicals must be stored, handled and dispensed in a manner that prevents spillage and contamination.	Contractor	Designated bunded area. Use of drip trays.
5. Negative visual impact			
Vehicle tracks	No new roads or tracks will be developed. No off-road driving or driving alongside tracks is allowed.	All	Visual inspections
Construction structures and facilities	Construction office and facilities are dismantled and removed	GM. Contractor.	Site inspection after completion of construction
6. Solid waste, sewage and wastewater discharge			
Large volumes of waste are generated, causing ecological damage including visual pollution, contamination of soil and groundwater, decline in health of wildlife, mortality of animals that ingest waste, habitat deterioration, etc.	Littering is not permitted and all waste must be placed in appropriate receptacles.	All	Site inspections
	The contractor will provide animal proof receptacles to contain daily refuse.	Contractor	Animal-proof containers and cage.
	A waste holding cage that is bird and animal proof will be used to store the solid waste before it is transported to a municipal waste facility.		
	Building rubble is consolidated in one, suitable location, removed	Contractor	Mgr to identify suitable manner.

NATURE OF IMPACT	MANAGEMENT	RESPONSIBILITY	TOOLS/MONITORING
	from the area, and disposed of at an official waste facility.		
	Used oils and other workshop waste must be stored in airtight containers, sealed, and dispatched to an appropriate waste facility.	Contractor	Mgr to identify suitable facility.
	Fat/grease traps will be installed at kitchen and all cooking outlets.	Contractor	Site inspections
	Hygienic temporary ablutions of sufficient quantity will be provided for workers.	Contractor	Site inspections
	Ablutions are regularly serviced and the sewage disposed of at a designated location and in an environmentally appropriate manner.	Contractor	Mgr to identify suitable manner.
Unpleasant odours	Continuous monitoring and maintenance of sewerage system.	Contractor	Site inspections
	Should unpleasant odours be identified, the source of the odours must be identified and remedied within 48 hours.	Contractor	
7. Machinery & vehicles			
Noise pollution	Efficient, modern, silenced generator will be used. Power tools and motorised equipment will be used during daylight hours only.	Contractor	Site inspections
Contamination of soil and water by hydrocarbons	The contractor will ensure that all equipment is in good working order and will not contaminate soil or water resources with diesel, petrol, oil or any other foreign substances.	Contractor	Site inspections
	Drip trays to be placed under any leak.	Contractor	Drip trays
	Vehicles and machinery with fuel, oil or hydraulic fluid leaks must be removed from service for repair.	Contractor	Site inspections
	No servicing or major repair of vehicles or machinery may take place on-site.	Contractor	
Damage to roads and tracks	The contractor shall ensure that all vehicles remain on designated roads at all times. No off road driving under any circumstances.	All	All contractors are made aware of this requirement.
	All vehicles used in the area must be operated with low tyre-pressure to minimise negative impacts on tracks and roads.	All	All contractors are made aware of this requirement.
8. Construction staff damage local environment			
Disruption of ecological processes through physical acts and/or pollution of the local habitat.	The contractor and his employees shall adhere to all regulations prescribed by the relevant authority at all times, as well as to the management measures given in this EMP.	Contractor	Site inspections
	The contractor will ensure the proper supervision of employees at	Contractor	Site inspections

NATURE OF IMPACT	MANAGEMENT	RESPONSIBILITY	TOOLS/MONITORING
	all times and their compliance with rules and regulations.		
	All employees will be educated as to the need to refrain from the destruction of plants and animals, as well as from indiscriminate defecation, waste disposal and pollution of soil and water resources.	Contractor	Induction
	Access to the site is restricted to the contractor's employees only.	Contractor	Site inspections
9. Bush fires			
Bush fires destroy habitats and animals, and present a risk to life and health of humans.	Take precautions to prevent the outbreak and spreading of fires and ensure all employees are aware of the precautions.	Contractor	Induction. Site inspections.
	Adequate firebreaks must be made around all infrastructure	MD, Contractor	Grader
	Gas canisters to be housed in Bureau of Standards approved structures.	Contractor	Gas enclosures
	Fire extinguishers and other firefighting equipment are strategically located throughout construction area. Staff are trained in their usage.	Contractor	Firefighting equipment
ENP fire management plan	The HCC requires that wildfires be left alone by the project staff unless life or property is under direct threat	MD, Contractor	HCC, COC
10. Social protection			
60 - 80 construction workers on site visit local shops and farms. Increase in sex work, domestic violence, general violence, alcohol abuse.	Awareness campaign in the community to make them aware of the dangers.	MD, GM, social workers, Hai//om Association, Traditional Authority	Corporate Social Plan JMC meetings
	OHT has made financial provision of N\$ 17m for community upliftment and outreach programmes. Social Protection is on the JMC rolling agenda - if / when incidents occur appropriate intervention is put forward, agreed and implemented		
	Construction staff village must be fenced. Workers are not allowed to leave the site after dark. No vehicles may be available to construction staff after dark.	MD, GM, Contractor	
	The Ministry of Health District Travelling Healthcare Nurse is requested to visit on site monthly.		Travelling nurse
11. Health and Safety of staff			
Injury to persons	Health and Safety aspects are not addressed in this EMP because	Contractor	Protective clothing as prescribed

NATURE OF IMPACT	MANAGEMENT	RESPONSIBILITY	TOOLS/ MONITORING
	they are regulated by another ministry. It is assumed that all contractors, their employees and other persons on the construction site will adhere to the relevant regulations.		by construction regulations and best practice.
	Equipment and tools handled only by persons qualified in their use.	Contractor	Specialised training.
	First aid kit is readily available on site and staff are trained the usage. Enough people on site are trained in medical protocols to deal with an emergency.	Contractor	First aid kit. Emergency and med-evac protocol. First aid certificates.
12. Heritage			
Construction activities damage and/or destroy sites of cultural significance.	Report any find that may be of cultural or archaeological value to the National Heritage Council.	MD, Contractor	Chance find procedure (Section 4.4). Visual inspections

4.2 Operational phase

Table 4. Management actions for the operational phase.

NATURE OF IMPACT	MANAGEMENT	RESPONSIBILITY	TOOLS/MONITORING
1. Biodiversity			
Game drives and operational vehicles disturb animals in their daily movements, hunting and/or foraging, potentially leading to stress and mortality. Damage to and destruction of vegetation and animal habitats, leading to a loss of habitat integrity and disruption of ecosystem functions. Decline in habitat quality, leading to mortality and a decline in local animal population integrity.	Guests and employees are made aware that they are in a sensitive environment, and are shown the appropriate way to interact with wildlife.	GM. Guides.	Guiding Protocol (APPENDIX II)
	Trained guides escort guests at all times, no self-drive or walking other than in designated areas.	Guides	
	No plants or animals may be disturbed, violated, destroyed or removed.	All	
	Employees are educated to refrain from the destruction of plants and animals, indiscriminate defecation, waste disposal and pollution of soil and water.	GM	
	Avoid areas containing nests, burrows, dens or roosting sites.	GM. Guides.	
	No protected, rare or endangered plants may be disturbed, damaged or removed.	GM. Guides.	
	Only permitted access roads and paths are used by employees, guest and vehicles at all times.	All	
	No off-road driving is allowed in Etosha National Park. Limited off-road driving will be allowed on the JV concession, and only in specified circumstances and according to the rules in the Guiding Protocol.	All	
Mortality of amphibians, reptiles, birds, mammals. Snakes are particularly vulnerable because they are killed on sight.	The rules and regulations of ENP will be followed by all lodge vehicles that enter the Park, and by all guides, guests and employees on these vehicles.	All	ENP rules and regulations
	Venomous snakes should be removed by a specialist, and other snakes should be avoided.	GM. Guides.	Visual inspections
Poaching of wildlife. Tortoises and small mammals are particularly vulnerable.	Educate staff in the ecological value of snakes and how to avoid them rather than kill them.		Visual inspections
	The lodge, back of house and surrounding areas should be searched for snares regularly.	All	Visual inspections
Damage to/removal of protected	Inspection of staff housing to check for animal parts and/or products		Visual inspections
	Identify protected species and demarcate sensitive sites.	GM. Guides.	Visual inspections

NATURE OF IMPACT	MANAGEMENT	RESPONSIBILITY	TOOLS/ MONITORING
species of fauna and flora	Educate staff to avoid sensitive sites.		Visual inspections
	Continuous monitoring to ensure that no protected species are impacted.		Visual inspections
Dead trees and plant material provide micro-habitats and act as carbon storage. Their removal causes a decline in habitat quality	No harvesting of plants or collection of firewood is permitted.	GM	Visual inspections
Invasive vegetation causes a decline in habitat quality	Regular monitoring and removal of invasive plants.	GM	Visual inspections
Positive impact: increased security for rhinos	The proponent, ENP and the Rhino division of MEFT will agree a rhino security protocol that will remain confidential and not available to the public.	MD, GM	Security protocol
2. Solid waste			
Large volumes of waste are generated, causing ecological damage including visual pollution, contamination of soil and groundwater, decline in health of wildlife, animals ingest waste causing mortality, habitat deterioration, etc.	Minimise waste by buying supplies in bulk and using re-usable packaging and transport options.	GM	Visual inspections
	Minimise plastic bottle waste by promoting local tap water and providing re-usable water bottles to guests.	GM. Guides.	Visual inspections
	All solid waste is either recycled or appropriately disposed.	GM. Maint.	Visual inspections
	Appropriate waste bins are provided at the point of source. All waste bins are covered and secured to be animal proof.	GM. Maint.	Visual inspections
	A bird, animal and wind proof waste holding cage is used to store solid waste until it is transported to a municipal dump site. This area is secured and has a concrete floor for maintenance and to prevent ground seepage.	Maint	Visual inspections
	Recyclable waste (glass, cans, plastics, paper) is stored on site until there is sufficient volume to be transported for recycling.	Maint	Visual inspections
	All waste that cannot be recycled, re-used or donated is stored on site in suitable containers, then disposed of at a registered waste facility.	Maint	Visual inspections
	Limited amounts of packaging may be burned in an incinerator.	Maint	Visual inspections
	Organic waste is buried in suitably designed deep, animal proof pits.	Maint	Visual inspections
Hydrocarbons contaminate the soil and groundwater, leading to deterioration of ecosystem processes	Used hydrocarbons are collected at point of use and stored in airtight, sealed containers.	Maint	Visual inspections
	Used hydrocarbons are despatched to an appropriate waste facility.	GM	Visual inspections

NATURE OF IMPACT	MANAGEMENT	RESPONSIBILITY	TOOLS/MONITORING
and a decline in habitat quality.			
3. Energy			
Excessive use of fossil fuels. Carbon emissions.	Energy use (diesel, petrol, paraffin, gas) is metered and monitored. Readings are compared with target usage to ensure optimum efficiency.	GM. Maint.	Logbooks, usage records, monthly reports to Head Office
	Generator is used as back-up only.	GM	
	Geysers are solar powered.	GM	
	All cooking is done with gas. The staff village is provided with functioning, safe gas stoves and gas cylinders.	GM	
	All electrical appliances are energy-efficient models. Fridge and freezer doors seal tightly and are kept closed.	GM	
Generator noise disrupts the sense of place and causes noise pollution.	Generator is housed in noise-limiting container; use generator only during daylight or for limited hours.	GM	
4. Water reticulation and consumption			
Loss of water through leaks in reticulation system	Maintenance programme for pipes and tanks is in place. Leaks and faults are repaired immediately upon detection.	Maint	Maintenance schedule
Overuse of groundwater	Water conservation is actively promoted among guests and staff. Guests are informed of water scarcity and encouraged to participate in water conservation.	GM	Water saving devices and measures are communicated to staff and guests
	Water usage is measured and recorded, then compared with targets to ensure optimum efficiency.	GM	Usage data, monthly reports
5. Sewage and wastewater			
Contamination of soil, as well as surface and groundwater, due to sewage and waste water discharge	Continuous monitoring and maintenance of the sewerage systems.	Maint	Visual inspections
	Bio-degradable toilet cleaners are used to preserve bacteria in the septic system	GM	Bio-degradable cleaning materials
Ecological impacts	Fat/grease traps are installed at kitchen outlets and maintained.	Maint	Maintenance schedule
	Septic tanks and soak-aways are maintained.	Maint	Maintenance schedule
Unpleasant odours	Qualitative monitoring of odours.	Maint	Inspections

NATURE OF IMPACT	MANAGEMENT	RESPONSIBILITY	TOOLS/MONITORING
	The source of unpleasant odours are identified and remedied within 48 hours of identification.	Maint	Repairs are carried out
6. Vehicle use			
Erosion of roads and tracks	Regular maintenance of roads and tracks.	Maint	Maintenance schedule
	Implement measures to disperse concentrated water flow and repair erosion at such locations.	Maint	Visual inspections
Damage to roads and tracks	Low tyre pressure on all operational vehicles.	GM. Guides.	Visual inspections
	Operational vehicles are 4-wheel drive and of standard width.	GM	Visual inspections
Off-road driving damages the structure of the soil surface and causes soil compaction, which results in less water infiltration and availability, limited root penetration and less vegetation cover. Damaged soil crust makes the fine underlayer of soil vulnerable to wind erosion, the resulting dust settles on plants, interferes with photosynthesis, and causes a decline in habitat quality.	No off-road driving is allowed, except in specific circumstances according to the Guiding Protocol. Only permitted access roads and paths are used by employees, guests and vehicles at all times. Avoid sensitive soils and areas where water collects.	All	Guiding Protocol. Visual inspections
	Making tracks next to a road is not allowed. Taking shortcuts is not allowed.	All	Visual inspections
	New roads and tracks have to be authorised by the MD and developed according to the road plan.	GM	Visual inspections
	Vehicles are parked only in designated parking areas.	All	Visual inspections
Exhaust emissions cause air pollution	Vehicles are serviced regularly and monitored for excessive exhaust emissions.	Maint	Visual inspections
Driving in drainages and washes disrupts surface water hydrology	Rivers, drainages and washes are entered and exited only at existing and designated points.	Guides	Visual inspections
Driving over flooded or moist areas disrupts surface water hydrology	No driving in seasonally inundated areas when flooded or moist.	Guides	Visual inspections
7. Operational activities			
Toiletries and cleaning chemicals cause contamination of the soil, as well as surface and ground water.	Kitchen and housekeeping soaps and detergents are biodegradable and eco-friendly.	GM	Bio-degradable cleaning materials
Chemicals disrupts the optimal functioning of the septic system.	Biodegradable and eco-friendly guest amenities are provided.	GM	Bio-degradable guest amenities

NATURE OF IMPACT	MANAGEMENT	RESPONSIBILITY	TOOLS/MONITORING
Vehicle parking, servicing and other workshop activities cause soil and groundwater contamination	Vehicle servicing is done on impervious, bunded surface or over oil pans.	Maint	Bunded surface, oil pans
Fuel storage and refuelling procedures cause soil and groundwater contamination	Fuel is stored in appropriate receptacles and kept on an impermeable, bunded surface.	Maint	Bunded surface
	Fuel is dispensed over impervious, bunded surface or drip trays.	Maint	Bunded surface, drip trays
Machinery use disturbs the natural quiet	Graders, tractors and power tools are used during daylight hours only.	GM	
Contamination of soil by paint, thinners, varnish, turpentine, detergents, etc.	These substances are stored in sealed, clearly marked containers and only in designated store rooms. Care is taken to avoid spills and unnecessary contact with soil, water, vegetation and animals. Decanting is done over a drip tray to prevent spillage and further than 40 m of any natural water source.	GM. Maint.	Drums with lids. Drip trays.
8. Design and landscaping			
Buildings intrude upon the landscape, affecting the sense of place	Infrastructure is designed to blend with the surrounding landscape.	MD. Architect	
Upward directed lights disturb the sense of place and has significant impacts on animals.	Outdoor lights are directed to shine down.	GM.	Outdoor lights
Invertebrates that are attracted to the light provide an unnatural food source for taxa such as bats and geckos. These insectivores are attracted to the food and then face conditions where they are more likely to die from causes such as collisions and predation.	No spotlights or upward facing lights are used.	GM. Architect	
Nightly invertebrate fatalities may result from exhaustion or predation, potentially disrupting their population numbers and causing disturbances in	Amber or yellow lightbulbs with the lowest possible brightness are used.	GM	Amber or yellow lightbulbs

NATURE OF IMPACT	MANAGEMENT	RESPONSIBILITY	TOOLS/MONITORING
ecological processes.			
Night-flying birds may be disoriented by lights, increasing the risk of predation and mortality.	All lights are turned off after guests have gone to their rooms.	GM	
Adult bird mortality leads to mortality of dependent chicks.	Low intensity, downward facing pathway lights that contribute to health and safety may be kept on at night.		Pathway lights
9. Socio-economic impacts			
A cycle of dependence and debt: Lodge staff spend their salary at bars, become dependent on alcohol and other substances, go into debt to fund their addiction, lose their jobs, and finally descend into criminality, causing more poverty. This cycle may become a long-term, intergenerational problem that the elders in the community have to deal with.	Awareness campaign in the community to make everybody aware of the dangers so that impacts can be addressed by the entire community.	MD, GM, social worker, Hai//om Association, Traditional Authority	Corporate Social Plan JMC meetings
	Awareness of domestic violence and how to handle it. Help for women and children vulnerable to domestic violence.		
	Educate employees in basic financial management. Regular financial advice to staff.		
	Employment contracts have a clause for random alcohol and drug testing at any time while on duty and when on the premises.		
	OHT has made financial provision of N\$ 17m for community upliftment and outreach programmes. Social Protection is on the JMC rolling agenda – should an incident occur appropriate intervention is put forward, agreed and implemented.	JMC	JMC meetings
	The Ministry of Health District Travelling Healthcare Nurse has been requested to visit the lodge monthly.	GM	Travelling nurse
Positive impact: Financial benefits to the Hai//om community. Employment and training opportunities. Community development.	75% of concession fees are paid to the Hai//om Association. Equity: The Association and Traditional Authority owns 8% shares each in the company. Employment is offered to qualified local community members first.	MD. JMC.	COC. JMC meetings. Corporate Social Plan in Appendix I.
10. Health and safety			
Labour policies	The company is in compliance with all national legislation and regulations governing workplace equity and diversity.	GM	Labour matters, health and safety are not addressed in this EMP because they are regulated by other
Staff and guest health and safety	The company is in compliance with all national legislation and regulations governing health and safety.	GM	
	Protective clothing, as appropriate to operations, is provided to employees.	GM	

NATURE OF IMPACT	MANAGEMENT	RESPONSIBILITY	TOOLS/ MONITORING
	Adequate first aid kits are available and regularly maintained. A suitable number of employees is trained in first aid.	GM	ministries and specific legislation. It is assumed that the proponent adheres to those.
	On-site staff housing is secure, clean, and provided with sufficient running water, sanitation and energy for the number of personnel accommodated. Staff housing is maintained.	GM	
	Employees and guests are made aware of procedures to follow in the event of an emergency, e.g. whom to contact, how to contact him/her during the night; evacuation routes.	GM	
	Employees responsible for guest transport have valid licences and public driving permits.	GM	
Fires destroy animals and habitats, and pose a risk to life and health of humans.	All precautions are taken to prevent the outbreak and spread of fires. Employees are trained in the necessary precautions and firefighting procedures.	GM	Fire fighting equipment. Gas storage facilities.
	Firefighting equipment is available, regularly maintained, and employees are trained in fire safety.	GM	
	Gas canisters are stored in Bureau of Standards approved structures.	GM	
	Fire extinguishers are strategically located throughout the developed area.	GM	
11. Implementation of EMP			
The operating company is responsible for the implementation of the management actions outlined in this table.			Quarterly meetings.
Contractual requirement: Appoint an independent environmental practitioner to do a yearly audit and report to MEFT.			Annual report to MEFT.
Eco Awards Namibia is an internationally recognised certification programme with independent, objective assessors who evaluate sustainability practices.	Keep certification up to date according to the programme regulations.	GM	Assessments every 3 years

4.3 Closure and decommissioning

Tourism is a non-consumptive activity with an indefinite projected lifespan and after 25 years the business and immovable assets will become the property of the Hai//om Association, as stipulated in the HCC and the COC. There is no intention to cease operations or decommission Ongava Hai//om Tourism lodge.

However, should closure and decommissioning be required, an extensive decommissioning plan will be drawn up and meticulously followed according to the highest standards of environmental management best practices. The priority for closure will be to return the land as closely as possible to the pre-construction condition. Measures will be taken to prevent soil erosion and provide protection for colonising vegetation. A site assessment will be carried out after closure to ensure that no structures remain, and that site rehabilitation has been fully achieved.

There would be four primary closure objectives.

1. Protect public health and safety, as well as health and safety of fauna and flora.
2. Alleviate or eliminate environmental damage.
3. Return the site to its original, pre-development condition.
4. Ensure that social and economic benefits are sustainable after closure.

Table 5. Decommissioning plan at concept level.

NATURE OF IMPACT	MITIGATION
Infrastructure	
Buildings and support infrastructure	All structures will be completely removed to the satisfaction of MET.
Roads and tracks	As required by MEFT, roads and tracks will be rehabilitated to a state as close as possible to the original condition of the area.
Pathways	All pathways will be rehabilitated to a state as close as possible to the pre-construction condition.
Vegetation: destruction of & damage to plants; disturbance of soil	
Soil erosion	The site will be suitably re-vegetated. If this is not appropriate, then it will be covered with scrub to prevent soil erosion and to provide protection for colonising vegetation.
Alien plant invasion	Follow-ups will be done to ensure that alien or invasive plants and weeds have not flourished.
Damage to vegetation	Construction guidelines will apply to ensure limited impact.
Soil	
Compaction of and damage to soils, contamination	Construction guidelines will apply to ensure limited impact.
Hydrology	
Contamination of ground and surface water, erosion of river banks	Construction guidelines will apply to ensure limited impact.
Animals: habitat disturbance; death of animals	
Death of animals, poaching, habitat	Construction guidelines will apply to ensure limited impact.

NATURE OF IMPACT	MITIGATION
or behaviour disturbance	
Negative visual impact	
Sewerage system	Septic tanks will be drained and removed. The area (including soak-away) will be filled with rubble or with fill from an environmentally acceptable source.
Water pipes	All pipe lines will be removed from the concession.
Electricity lines	All electricity infrastructure will be removed from the concession.
Foundations, concrete slabs, holes in ground	All structures in or on the ground will be removed. All holes, pits and depressions will be filled.
Ground surface retains signs of development	Ground surface will be raked, swept and levelled as appropriate. Rocks, stones and vegetable matter will be scattered as appropriate to return the ground to a state as close as possible to its original condition.
Construction structures and facilities	Construction site office, facilities and structures to be dismantled and removed once decommissioning is completed
Solid waste, sewage and waste water discharge	
Large volumes of rubble, materials and equipment	Everything will be removed from the concession.
	Nothing will be burnt or buried on the concession.
Ecological damage	Construction guidelines will apply to ensure limited impact.
Machinery & vehicles: noise, contamination of soil and water by liquids, erosion of roads	
Noise, contamination of soil and water, erosion	Construction guidelines will apply to ensure limited impact.
Construction staff damage local environment	
Disruption of ecological processes through physical acts and/or pollution	Construction guidelines will apply to ensure limited impact.
Bush fires: destruction of habitat and death of animals	
Outbreak of fire	Construction guidelines will apply to ensure limited impact.
Health and Safety of staff	
Injury to persons	Construction guidelines will apply to ensure limited impact.

4.4 Heritage chance find procedure

When a heritage site or item of cultural significance is discovered during any phase of the development, it has to be reported to the National Heritage Council to ensure compliance with the National Heritage Act (27 of 2004), section 55: “a person who discovers any archaeological object must as soon as practicable report the discovery to the Council”.

There is a specific process to follow when a potential heritage item is found, whether by a contractor, guest or lodge staff member. The Heritage specialist for this EIA, Dr Nankela, (Scoping Report, Section 6.3 and 7.1.1) provided the chance find procedure in

Table 6.

Table 6. Heritage chance find procedure

1. Responsibilities	
Finder	The person who discovers archaeological or heritage items
Supervisor	Secure site and advise management
Senior manager	Report finding to NHC. Determine safe working boundaries
Archaeologist	Inspect, identify, advise management, and recover the items
2. Actions	
Person	Actions
Finder	If operating machinery or equipment, stop work
	Demarcate the site
	Take GPS coordinates if possible
	Report findings to supervisor
Supervisor	Report findings, site location and actions taken to superintendent.
	Cease any works in immediate vicinity
Senior manager	Visit site and determine whether work can proceed without damage to findings
	Determine and mark exclusion boundary
	Site location and details to be added to Archaeological Heritage Geographical Information System (GIS) for field confirmation by archaeologist
Archaeologist	Inspect site and confirm addition to GIS
	Advise NHC and request written permission to remove findings from work area
	Recovery, packaging, and labelling of findings for transfer to National Museum
3. Discovery of human remains	
	Actions as above
	Advise and liaise with NHC and Police
	Recovery of remains and removal to National Museum or National Forensic Laboratory, as directed by the police and NHC

4.5 Social plan

OHT will comply with all the Namibian laws, regulations and guidelines governing labour, health and safety, and will make sure that all contractors do the same.

The Technical Proposal submitted by OHT during the tender process contains a Corporate Social Plan with two sections, an empowerment plan and a social development plan, and it is attached to this EMP as Appendix I. This Corporate Social Plan will be implemented throughout the life of the project and some measures are already in place, e.g. rooms for the clinic are being built.

In addition to the Corporate Social Plan given in Appendix I, Social Protection measures are recommended in Table 3 and Table 4.

4.6 Road and soil management plan

The characteristics, sensitivities, resilience and land use options of soils in the Ongava Hai//Om area emphasise the importance of customised management practices. Sustainable land use strategies are vital to protect these soils and optimise their potential for conservation applications.

4.6.1 Road plan

A soil scientist specialising in tourism and conservation, Dr Gerhard Nortjé, designed a road map for the concession with the aim of optimising game sightings while maximising soil conservation. The recommended road layout is given in Figure 2.

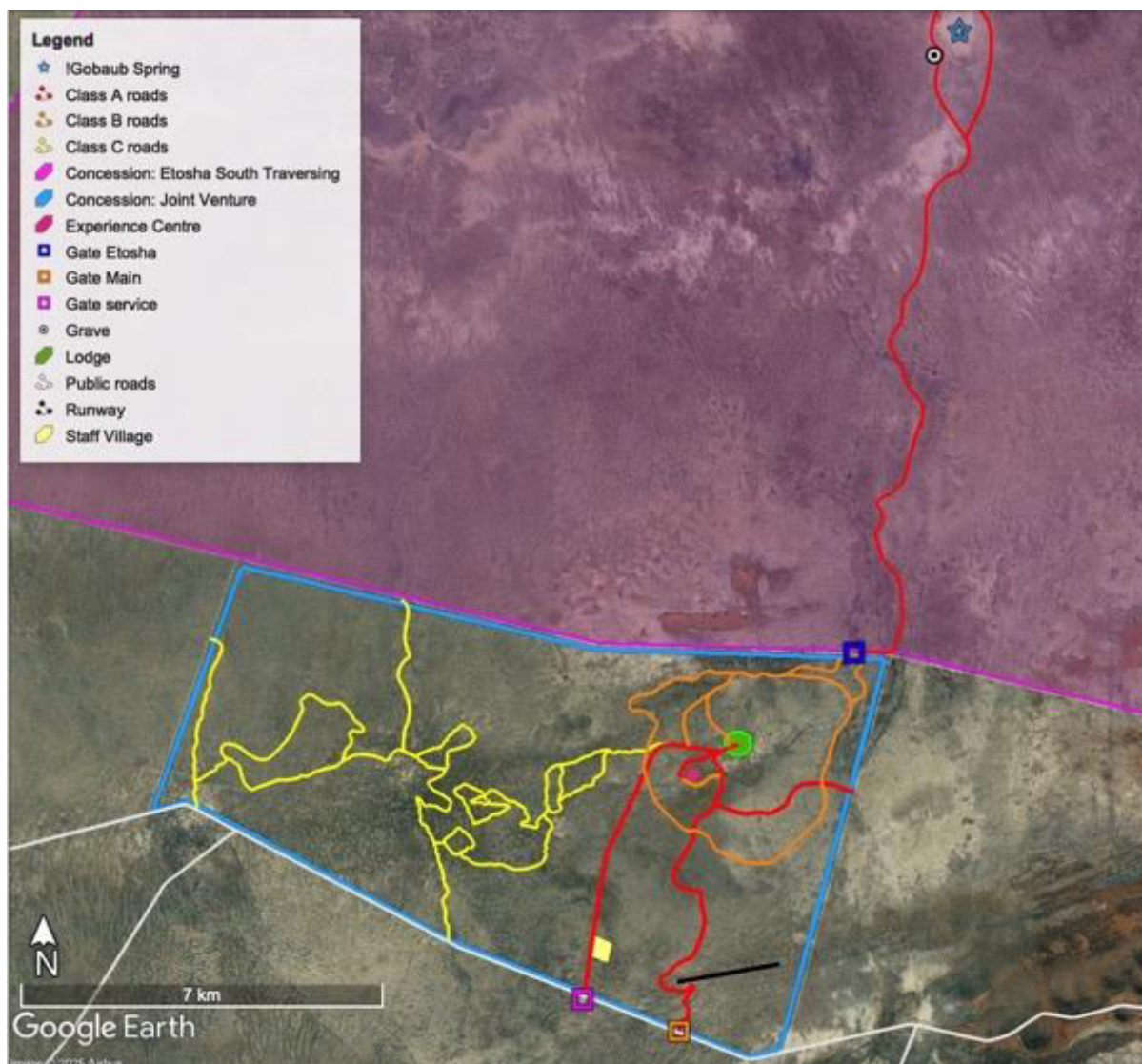


Figure 2. Proposed road network

Existing borrow pits on the JV concession and neighbouring farms will be used for all road building and upgrading (**Error! Reference source not found.**). No borrow pits will be created in ENP. Water for road building will be obtained from the JV Concession.

All the proposed infrastructure will be located on Pellic Vertisols, a soil type with a high sensitivity rating (Figure 3), requiring substantial management efforts and careful attention to moisture levels and structural integrity to prevent degradation. The soil sensitivity map indicates the relative sensitivities of the soils for the specific land uses in the Ongava Hai||Om concession, emphasising the vulnerability of those soils to various land uses.

There will be no off-road driving whatsoever in Etosha National Park. On the JV Concession, limited off-road driving will be allowed in specified circumstances and according to the rules stipulated in the Ongava Guiding Protocol in APPENDIX II.



Figure 3. Soil sensitivity map (image: Dr Nortjé)

4.6.2 Road management

Roads should be graded to prevent the accumulation of stormwater, with material removed from the side of the road to create side drains. This material can be used to form a small embankment, slightly raising the road. These roads should be constructed according to conventional methods by the concessionaire and will serve as important ring roads within the concession area, providing access to the game lodge. Unlike Category D ground tracks, periodic maintenance should be applied to these roads.

The guidelines in Table 7 are primarily intended for use with gravel (calcrete) roads, but many of the guidelines and recommendations are equally applicable to ground and ground track roads. Some roads may, in fact, be a combination of ground and gravel (calcrete) (Category C roads), where gravel (calcrete) is only imported for certain sections, for which the in-situ material is not suitable. Examples of these roads would be the proposed Class C game drive roads on the farm Nuchas and in the Etosha concession.

Four road categories were identified for this project (Table 7) and they are described here.

1. Surfaced roads (Category A) will usually be the heaviest trafficked road in a concession area and the alignment of the road will usually be fixed with a high certainty of not changing. The probability exists that roads in this category were previously used as Category B roads which needed to be upgraded. Examples: i) main access road to the ENP gate, ii) from the gate to !Gobaub, and iii) from airstrip to main lodge.
2. Gravel (calcrete) roads (Category B) have a designed layer of imported material which is typically constructed to a specified standard and width and provides an all-weather surface. Vertical and horizontal alignment is generally upgraded to appropriate

standards. The maintenance of gravel (calcrete) roads is carried out more regularly and systematically, and a higher level of service is obtained, although the roughness varies considerably over time and depends significantly on the maintenance activity. These roads generally act as access roads to game lodges, with a fixed alignment and the possibility of being resurfaced in the future. Example: access to specific wildlife viewing areas.

3. Two-track roads on the earth (Category C) are classified as those roads on which very little imported gravel (calcrete) is used, but the in-situ material is cleared of vegetation and lightly compacted by low-mass compaction equipment. Gravel (calcrete) should be applied to problem areas, such as muddy or sandy sections. A suitable stabilising agent can be applied to the in-situ material to enhance the bearing capacity thereof and the applicable agent relevant for that particular material type and circumstances should be confirmed by the construction of a short trial section. Examples: i) access to off the beaten path wildlife viewing and ii) service or ranger access roads, firebreak roads.
4. Two-tracks on the ground (Category D) are the simplest 'low-volume roads' and generally consist of parallel ruts separated by vegetation, delineating (for example) a route of access to a water hole or a link between a two-track ring road. These tracks are not engineered and are often impassable during or after wet weather conditions. In most cases, they will carry less than about twenty vehicles per day. Examples: i) access to remote waterholes or seasonal features and ii) connecting roads between two-track ring roads.

Table 7. Road categories for the Ongava Hai//om Concession

A glossary of terms is given in Section 0.

Road Category				
	A	B	C	D
Description	Surfaced link road between other areas in the park or the access road to the game lodge	All weather gravel (calcrete) roads, access road to game lodge	Lightly trafficked all weather two-track roads, ring roads	Lightly trafficked two-track roads, link roads
Importance	Very important	Important	Less important	Less important
Service level	High level of service	high level of service	Moderate level of service	Moderate to low level of service
Typical Pavement Characteristics				
Soil risk				
	Very low	Low	Medium	High
Approximate design reliability (%) *	95	90	70	50
Total equivalent traffic loading (E80/lane) *	0,3-1,0 x 10 ⁶ over 20 years	0.1-0,3 x 10 ⁶ over 20 years	0,3-1,0 x 10 ⁴ depending on design strategy	0,3-1,0 x 10 ⁴ depending on the design strategy
Typical pavement class*	ES1 – ES6	ES1 – ES5	ES1 – ES2	ES1 – ES2
Daily traffic (vehicles/day/track) *	200 - 400	<200	< 50	< 20

4.6.3 Terms used in Table 7

Approximate design reliability

The probability that the pavement will perform without failure or significant distress (e.g., cracking, rutting or structural deterioration) over a specified period, typically 20 to 40 years, under the expected traffic load and environmental conditions. A higher percentage means a more confident prediction that the pavement will function as intended throughout its design life.

Stabilising agent

A material or chemical compound added to the existing soil or gravel to improve its bearing capacity by enhancing the strength, durability and overall performance.

Types of stabilising agents

Cement: often used to increase the strength of gravel or soil by binding the particles together, it is commonly applied to improve road durability and prevent erosion.

Lime: used to stabilise clayey soils by altering their structure, reducing plasticity and increasing strength.

Bituminous products (asphalt emulsion or cutback asphalt): bind and stabilise the gravel surface and provides water resistance.

Polymer-based stabilisers: liquid or powder products designed to bind soil particles and improve compaction, making them more resistant to erosion and wear (e.g. polyacrylamide or PAM).

Fly ash: a by-product of coal combustion that stabilises soils, particularly clayey soils, it reacts with the soil to form stronger bonds.

Total equivalent traffic loading

The heavier a vehicle, the more stress it exerts on road pavements. E80 expresses the cumulative effect of all vehicle loads in terms of how many times an 80 kN axle load would be applied to the pavement, e.g. a truck with a heavier axle load than 80 kN will contribute more to the equivalent loading than a car with a lighter axle load.

Typical pavement class

ES means “Equivalent Standard Axle load. The higher the number, the greater the expected load the pavement is designed to handle.

ES1: low traffic loading category, where the pavement is designed for light traffic, such as local roads with minimal truck traffic.

ES1 – ES6: a range of pavement classes that cover roads with light to very heavy traffic loads, including those with moderate to high truck traffic and possibly major highways or arterial roads.

ES1 – ES5: roads with moderate to heavy traffic, but not as high as ES6.

ES1 – ES2: roads with light to moderate traffic, suitable for local roads or residential streets, which see lighter loads and less frequent truck traffic.

Daily traffic

The average number of vehicles using a single lane or track of a road each day, measured over a period of time and averaged to account for daily and seasonal fluctuations in traffic volume.

5 MONITORING

This EMP can only provide value in preventing and managing potential impacts if the proponent implements it. Compliance with the EMP must be monitored regularly, and adaptive management applied based on the results of monitoring.

The proponent has to deliver monthly reports to MEFT during the construction phase, and annually thereafter. An annual EMP audit report must be prepared by an independent environmental consultant, as stipulated in the HCC and COC.

5.1 Water monitoring

1. Visual inspection of borrow pits for any waste or groundwater seepage and immediate removal of contaminants.
2. Inspection of wastewater treatment facility, sampling and analysis of effluent.
3. Ensure minimal leakage from evaporation ponds.
4. Ensuring landscape irrigation is not carried out in areas of human activity.
5. Monitor abstraction rates and groundwater level.
6. Assessment of abstraction rate yearly and adjustment as required for sustainable utilisation.
7. Groundwater level monitoring in all boreholes – production and monitoring borehole (weekly)
8. Abstraction volume monitoring from all production boreholes (weekly)
9. Rainfall monitoring (daily)
10. Considering the shallow water table, it is essential to prevent groundwater contamination by ensuring that septic tanks are sealed and all pipes leak-free.
11. Groundwater quality is monitored annually (at least) at a point of use (tap in the kitchen or bathroom) to analyse for fitness for human consumption, seeing as staff drink borehole water and guests are encouraged to drink it.
12. Groundwater samples are also taken from the boreholes that are used for abstraction in order to monitor contamination from all lodge discharges, both point source and non-point source. The guidelines for effluent monitoring in the Effluent Discharge permit must be followed at least annually.

5.2 Biodiversity monitoring

Table 8. Biodiversity aspects that need to be monitored

Aspect	Frequency
Vertebrate fauna	
Collision impact of birds with solar PV panels	During maintenance and/or monthly
Collision impact of birds with glass windows	As/when occurs
Vegetation	
Reinfestation of invasive alien plant species	Annually
Soil erosion	
Soil erosion on slopes	After each rainy season

6 CONCLUSIONS AND RECOMMENDATIONS

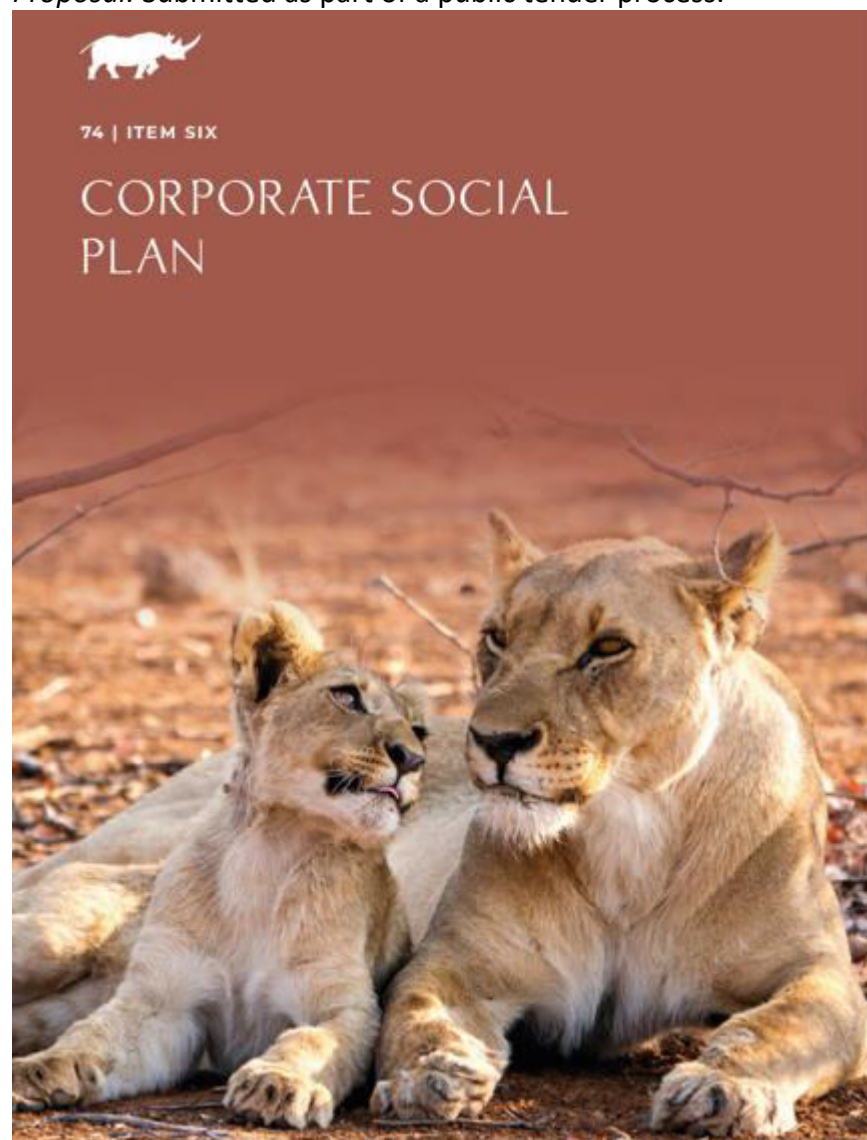
This Environmental Management Plan describes the management measures that can prevent or mitigate negative environmental impacts and enhance positive impacts that may result from the construction and operation of the lodge. It is a legally binding document that compels Ongava Hai//om Tourism (Pty) Ltd to comply with the management measures, monitoring programmes and other plans presented in this document. The EMP will be implemented throughout the lifetime of the lodge, including closure and decommissioning should that become necessary.

No fatal flaw was identified, and all potential impacts can be either prevented or mitigated to a low or very low significance by implementing the measures in this EMP.

It is recommended that an Environmental Clearance Certificate be issued to the proponent.

APPENDIX I. CORPORATE SOCIAL PLAN

Extracted from the document: Ongava Game Reserve, 2020. *Hai//om Association Traversing Concession in the Etosha National Park. Technical Proposal*. Submitted as part of a public tender process.



APPROACH

Ongava Game Reserve (Pty) Ltd (Ongava) is keenly aware that the success of its tourist operations and related conservation efforts are inextricably linked to enhancing the development opportunities for especially the Hai//om communities that reside on the resettlement farms acquired by the Government of the Republic of Namibia south of the boundary of the Etosha National Park. Ongava's approach is based on the solid belief that through strategic and carefully consulted actions considerable progress towards improving livelihoods in the broadest sense can be realised for the Hai//om living on these farms, for the region and Namibia as a whole.

CORPORATE SOCIAL PLAN ("CSP") COMMITMENTS

- Previously Disadvantaged Namibians (PDNs) with potentially > **30% Ownership**
- Strategic representation (Ongava, PDN, Employees, Hai//om IGobaub Association and Hai//om Traditional Authority)
- Employment of **50 staff (12 game reserve and 38 lodge)**
- Skills development (e.g. Training Centre and in-house training)
- Local Procurement and Entrepreneurial Development Plan
- A minimum guaranteed N\$17,4m commitment for first 5 years in the Hai//om Community Social Investment plus 1% of HQJV Gross Revenue estimated to total **N\$8.3m** over the concession period.*

Ongava considers the following key principles essential to implementing its Corporate Social Responsibility plan.

- That the actions / activities undertaken should not limit or close off opportunities for future generations. Ongava is committed to ensuring that the principles of environmental sustainability are included in all actions and particularly those actions that are directed at climate change mitigation and adaptation, which is essential for any sustainable development to take place. Some forecasting predicts that Namibia's average temperature will increase by between 2 & 6 degrees and that average rainfall will decrease by up to 15% by 2050. The area of these farms and the concession area are considered to be highly vulnerable to the impacts of climate change.
- As part of the proposed joint venture, Ongava believes that the Hai//om community should be afforded an opportunity to be shareholders in the new venture and to have representation on the Board of Directors of the joint venture. The shareholding and Company structure will be as described below.
- The Ongava group has a proven track record related to training and skills development. It will intend to upskill employees in the new Werda Lodge and proposed Hai//om Game Reserve in much the same way it has successfully done on the Ongava Game Reserve. Hospitality staff, dependent on their positions will be afforded the opportunity to develop skills that are recognised both nationally and internationally. For example, chefs will train through a Namibian culinary school (Silver Spoon Academy) towards City and Guilds level qualifications and guides will train through the African Field Guiding Association (AFGA), both of which are internationally recognised. This will allow employees to develop skills that not only upskill, but also afford them opportunities/careers in the wider world.

- It is the intention of Ongava to recruit as a first priority, from the local Hai//om community as far as possible and as a second priority, from Previously Disadvantaged Namibians (PDNs). Where the job positions cannot be filled by qualified individuals from the local community the vacancies will therefore be offered to PDNs and thereafter to external candidates that are able to fulfil the minimum requirements and key conditions of service.
- Although Ongava proposes to address other broader development issues, it is committed to identifying together with residents' innovative solutions that will mitigate the impacts of climate change for future generations.
- Ongava also recognises that social development and inclusion are critical for any of the development actions and for achieving sustainable development. This translates into empowering all people to participate in and benefit from any development undertakings thus ensuring that barriers against those that are often excluded from the process such as women, children, people with disabilities and the youth etc. are removed.
- Ongava will also work with all stakeholders to identify strategic initiatives and goals that address national development priorities where appropriate. Ongava recognises that achieving any meaningful development is dependent on effective collaboration with all stakeholders involved. It should be made abundantly clear that the efforts of the Ongava Development Foundation do not replace any other ongoing or planned initiatives but seeks to compliment planned and ongoing initiatives in order to avoid unnecessary duplication of efforts and to maximise the impacts of any development initiatives.
- The proposed CSP is about providing opportunities and a conducive environment where the Hai//om community can make their own decisions about their future. It is also about enabling the Hai//om community taking much greater responsibility for managing development assistance, managing their farm resources productively as well as other initiatives that may be undertaken. Strong and effective leadership on the part of the Hai//om will be essential for any progress to be made.
- Where appropriate, the actions / activities will focus on community upliftment, however, Ongava also recognises that within the Hai//om community on these resettlement farms there are multiple diverse opinions and aspirations. Therefore, Ongava will also pursue efforts that promote individual development, such as business ventures etc.

In order to implement the activities of the Corporate Social Responsibility plan Ongava proposes the following broad framework, comprising two elements, namely:

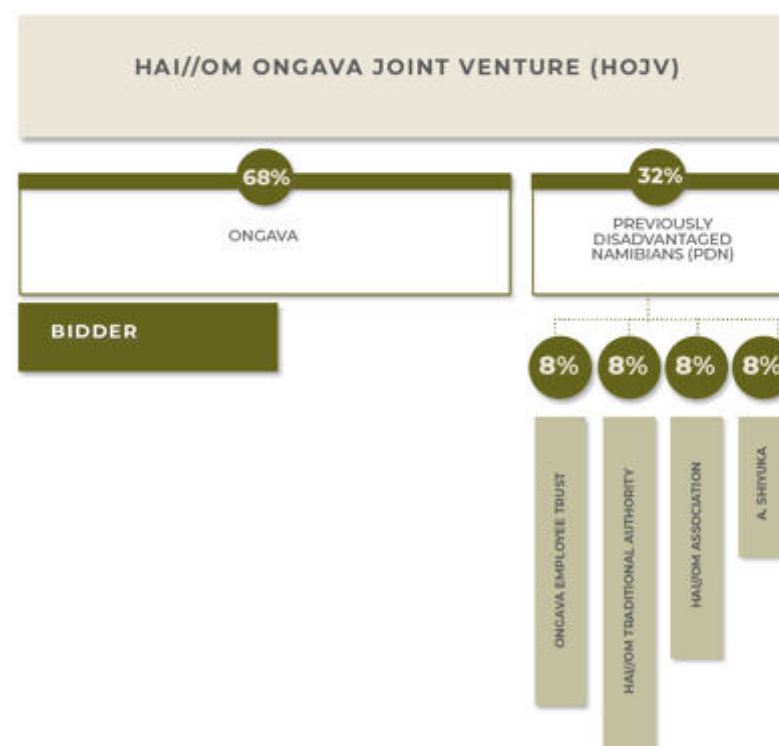
- AN EMPOWERMENT PLAN
- A SOCIAL DEVELOPMENT PLAN.

(74.1-5) EMPOWERMENT PLAN

(74.1) OWNERSHIP

- The Concessionaire and Previously Disadvantaged Namibians (PDN's) will be represented in the ownership structure of Ongava through 4 different shareholding vehicles. Firstly, the Hai//om community will have 8% ownership of this commercial venture awarded to the !Gobaub Hai//om Community Association and a further 8% of ownership will be awarded to the Hai//om Traditional Authority. Secondly, an employee Trust will be formed to include the employees in long-term service within the Ongava group. This vehicle will also be awarded 8% ownership of this commercial venture. A further 8% of ownership will be awarded to an empowerment partner, Mr. A. Shiyuka. This brings the total Previously Disadvantaged Namibian shareholding to 32%. Voting will be according to shareholding.

SHAREHOLDING STRUCTURE



(74.2) STRATEGIC REPRESENTATION

The board of directors has a strategic function in providing the vision, mission and goals of the organization. The Concessionaire and Previously Disadvantaged Namibians (PDN's) will be strategically represented by awarding each shareholding entity the right to appoint one director/representative to the board of directors. This will allow the IGobaub Hai//om Community Association and the Hai//om Traditional Authority to each elect a representative to help guide and assess the overall direction and strategy of the business. The Empowerment partner and the Employee Trust will be allowed to each appoint one director/representative of their choice. In total, the board of directors will consist of 5 or more representatives, of which 67% will be Previously Disadvantaged Namibians.

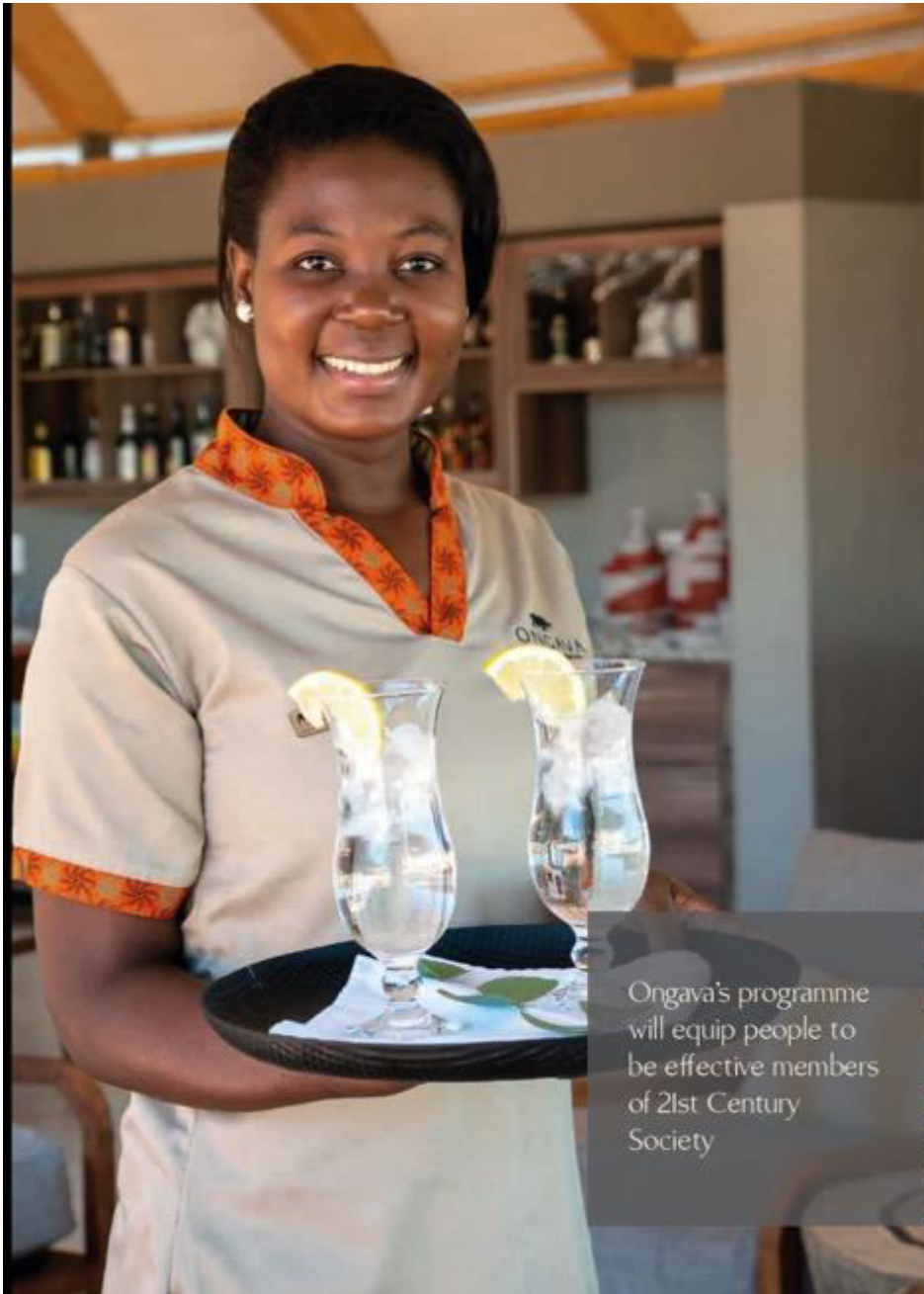
(74.3) EMPLOYMENT PLAN

The Ongava group is an approved affirmative action company as per National policy and the current staff complement is represented from across the Namibian demography and supports equal opportunity employment.

Ongava has identified 50 job positions that will need to be filled, each requiring a different level of education, skill and experience. Individuals that meet the minimum requirements and key conditions of service will receive a market related starting salary and individuals with additional skills, knowledge and experience will qualify for a higher salary within the parameters of the position.

It is the intention of Hai//om Ongava Joint Venture to recruit as a first priority, from the local community as far as possible and as a second priority, from Previously Disadvantaged Namibians (PDNs). Where the job positions cannot be filled by qualified individuals from the local community the vacancies will therefore be offered to Previously Disadvantaged Namibians and only thereafter to external candidates that are able to fulfill the minimum requirements and key conditions of service.

It is estimated that the largest portion of the vacant positions can be filled by local community members from the commencement of commercial operations. Approximately 85% or 43 of the 50 vacant positions can be recruited from the local Hai//om community after participating in and continuing ongoing training and skills development through a structured program of formal learning. The Ongava group will offer internships and mentorship opportunities through on-the-job training to such interested individuals as far as possible.



Ongava's programme will equip people to be effective members of 21st Century Society





(74.4) SKILLS DEVELOPMENT PLAN

Over the past 30 years the Ongava has established various training and development programmes for most of the job positions offered, which endeavor to support personal growth and development and allow for the formation of a career path, as opposed to simply providing job opportunities. Ongava firmly believes in up-skilling, training, and career development for all its employees and actively develops ongoing programs and positions to facilitate this. This structured program of formal learning does not only ensure the delivery of quality training, but also means that staff members receive certification and skills which are formally recognised.

All staff are trained using structured programs of formal learning through various platforms and in partnership with various organisations. Dependent on their role the accredited institutions that we currently partner with are:



LIMPOPO FIELD GUIDING ACADEMY: offer African Field Guiding Association (AFGA) certified Guide training and courses. These qualifications are recognised across Africa.



SILVER SPOON ACADEMY: a culinary institute based in Windhoek which offer recognised City & Guilds accredited courses and qualifications. This provides cook / chef training from basic to diploma levels. City & Guilds qualifications are internationally recognised.



LOBSTER INCORPORATED: an international online platform for hospitality training. This organisation provides a wide array of industry accredited online training courses (both theory and practical) for all aspects of hospitality. This allows students to train at their own pace.



POACHING PREVENTION ACADEMY (PPA): provide the necessary training and certification for the reserve anti-poaching and monitoring staff. Ongava has also developed an intense in-house training in these departments.



E-MED RESCUE 24 AND NAMIBIA FIRST AID TRAINING SCHOOL: Namibian Paramedic companies, which provides advanced First Aid Trauma training for all departments.

For the training and development of the Hai//om Private Game Reserve and Werda Lodge personnel, we would propose using the same organisations for the necessary training. Hai//om Ongava Joint Venture would be able to leverage these existing relationships with the accredited institutes and furthermore, HQJV will offer internships and mentorship opportunities through on-the-job training to these personnel as far as possible.

In-service training through internships and mentorship is a direct peer-to-peer teaching method of skills transfer between mentor and trainee. The mentor will focus on teaching the necessary skills, knowledge, and competencies that are needed to perform the specific job within the workplace. On-the-job training uses the existing workplace tools, equipment, documents, and knowledge to

teach the trainee how to effectively do their job within the working environment. Ongava will follow a 70/20/10 rule – this implies that 70% of learning comes from on-the-job experience and skills transfer between mentor and trainee, 20% of learning comes from interaction and collaboration with other people in the workplace, and 10% of learning comes from formal training.

Through these internships and mentorship, the trainees can learn from the significant wealth of expertise and knowledge available and at their disposal from Ongava. With Ongava's existing deep roots in the community, including many colleagues of Hai//om descent, the majority of all the Werda Lodge placements could be sourced from within the community provided they successfully complete the training.

(74.5) LOCAL PROCUREMENT AND ENTREPRENEURIAL SUPPORT

The development and ongoing support of small and micro businesses can transform the local community and the economy. By securing new contracts, gradually upgrading production, and investing in expansion, these businesses can thrive. In turn this creates further local linkages and growth and the potential for job creation is considerable.

Some of the services that HOJV will consider for outsourcing to local community contractors are:

LAUNDRY SERVICES



STAFF TRANSPORT SERVICE



CURIO SHOP CRAFTS AND PRODUCTS PRODUCTION



The following steps will be implemented to encourage the development of new suppliers and supporting local subcontracting:

- Make the company procurement policy and information regarding purchasing processes and upcoming contracts available to the local community as early as possible, to allow the local businesses adequate time to prepare a proposal for engagement.
- Break-down contracts into small sections to make the supply of goods and services manageable and to encourage greater local competition.
- Adjust the contracts and service level agreement to make them compatible with the capabilities of these local businesses.
- Offer ongoing support, technical assistance, and training to these local businesses.
- Assist potential local businesses in acquiring start-up loans.
- Help potential local businesses write their company profiles, and
- Provide ongoing guidance and encourage local business owners to draw on other expertise.

HOJV will publish a tender for new service requirements. Several operational details will be specifically designed to facilitate a new entrepreneur from the local community. For example, the tender specified may include:

- the use of previously unemployed people to staff the operation
- a possible eight-hour operating shift period with no night shift or overtime to reduce costs relating to transport
- the contractor would receive payment before month end in order to facilitate staff salary payments and payments to creditors
- the contract will be based on an anticipated metrics (e.g. wash volume, km to be driven, etc.) for which a set fee will be remunerated.

HOJV will purchase the necessary equipment and will take responsibility – on the condition of good management and usage practices – for maintenance and servicing in the first year of operations.

Once the contractor has been selected, he/she will be given an extensive service level agreement detailing all expectations, responsibilities, conditions, regulations, and procedures. The service level agreement will outline the roles and responsibilities of all parties involved and will form the basis of all aspects of the supply relationship.

Informal daily interactions will be complemented by regular structured meetings between the local contractor and HOJV.

Over several months, any issues arising will be resolved in consultation, and further capacity developed as this becomes necessary.

(74.6) SOCIAL DEVELOPMENT PLAN**SOCIAL INVESTMENT INSTRUMENT****– ONGAVA DEVELOPMENT FOUNDATION (ODF)**

Ongava will establish a social investment fund, through the Ongava Development Foundation (ODF), that will receive a guaranteed annual budget to be used to finance projects/actions/initiatives that are undertaken. The ODF will finance the operational costs of any project implementation by ODF, i.e. staff, vehicle etc. (see table below). However, ODF's operations budget shall not exceed 30% of the total budget in any one year, this means that 70% will be ring fenced for projects. ODF will receive financing from at least three broad categories of funding:

- A guaranteed budget from the Ongava operations in the amount of USD1 million, amounting to ~ N\$17 million, spread over five years.
- A 1% contribution of gross revenue from the HQJV, and,
- Donations and public funding - the ODF will utilise the guaranteed funding to leverage public sector and or other funding for specific projects that might require additional financing.
- The following table provides an overview of the proposed guaranteed investment (~N\$17m) and covers an initial period of five (5) years. Additional funding as per financial budget (1% of revenue) over 24 years ~ N\$ 8 992 365. See table below. The proposed financing plan will be subject to annual review of the Fund and will be re-evaluated after a period of five (5) years.

YEAR	GUARANTEED ANNUAL BUDGET	ADDITIONAL FINANCING	COMMENTS
YEAR 1	N\$ 5 million	None anticipated	No additional funds anticipated, and initial start-up costs are expected to be significant
YEAR 2	N\$ 3 million	Approximately N\$ 1 million	Total N\$ 4 million
YEAR 3	N\$ 3 million	Approximately N\$ 2 million	Total N\$ 5 million
YEAR 4	N\$ 3 million	Approximately N\$ 3 million	Total N\$ 6 million
YEAR 5	N\$ 3 million	Approximately N\$3 million	Total N\$ 6 million

Ongava Development Foundation (ODF) will be largely responsible for providing oversight for the implementation of the Social Development Plan. Much of the details with reference to the ODF, its composition, its mandate and the Social Development Plan will be clarified and agreed upon after proper consultation with stakeholders within the first year of the concession contract. However, the following broad aspects are relevant.

- The aim of the ODF is to provide a consultative platform for the coordination, approval, and implementation of the activities to be undertaken as part of the Social Development Plan. This would include reviewing progress, proposals, and financial accountability.
- The ODF will be fully registered according to Namibian law and will carry out its duties in compliance with Namibian law and will be not for profit.
- Additional funding for specific actions will be leveraged in the name of the ODF.
- It is proposed that the composition of the ODF should consist of between five Trustees (two from Ongava, one from the !Gobaob Hail/om Community Association, one from the Traditional Authority and one from Etosha National Park) to ensure that it can function effectively and efficiently in the interest of key interest groups. Emphasis will be placed on co-opting other stakeholders etc. when appropriate, e.g. when seeking expert technical advice. The ODF will also have permanent staff, the number and nature thereof are still to be determined, as well as other essential resources such as vehicle and office to enable the work to be carried out the work as agreed by the Trustees.

OVERVIEW OF PROPOSED INTERVENTIONS / AREAS OF SUPPORT

Ongava is mindful of the fact that since the acquisition of these resettlement farms there have been a number of proposals and projects that have aimed to address a variety of issues including farming support, healthcare, education, training and empowerment to name a few. These support interventions have been implemented by a host of government line ministries, NGOs and CBOs, between 1998 and 2013 at least ten (10) NGOs/CBOs have been involved in one way or another, many of which are actually defunct today. Unfortunately, many of the undertakings have met with little or no success or have folded when management and financial support has ceased. Ongava is also mindful of the fact that it does not want to dictate what development initiatives are undertaken as part of this Social Development Plan and recognises that a number of key role players are involved representing diverse opinions and priorities for development.

NEEDS ASSESSMENT

Considering the above Ongava proposes to undertake a comprehensive and inclusive consultative assessment of needs and priorities to confirm or realign the development priorities for support within six (6) months of the awarding of the concession, into a first draft Social Development Plan undertaken at the cost of ODF. Two key outputs of this exercise are expected, a priority list for support and a costed Action Plan and Timeframe.

What follows is a broad overview of what Ongava considers to be potential priority areas for support as part of its Corporate Social Plan, but this would need to be confirmed by the needs assessment and agreed upon in the proposed five (5) year Social Development Plan.

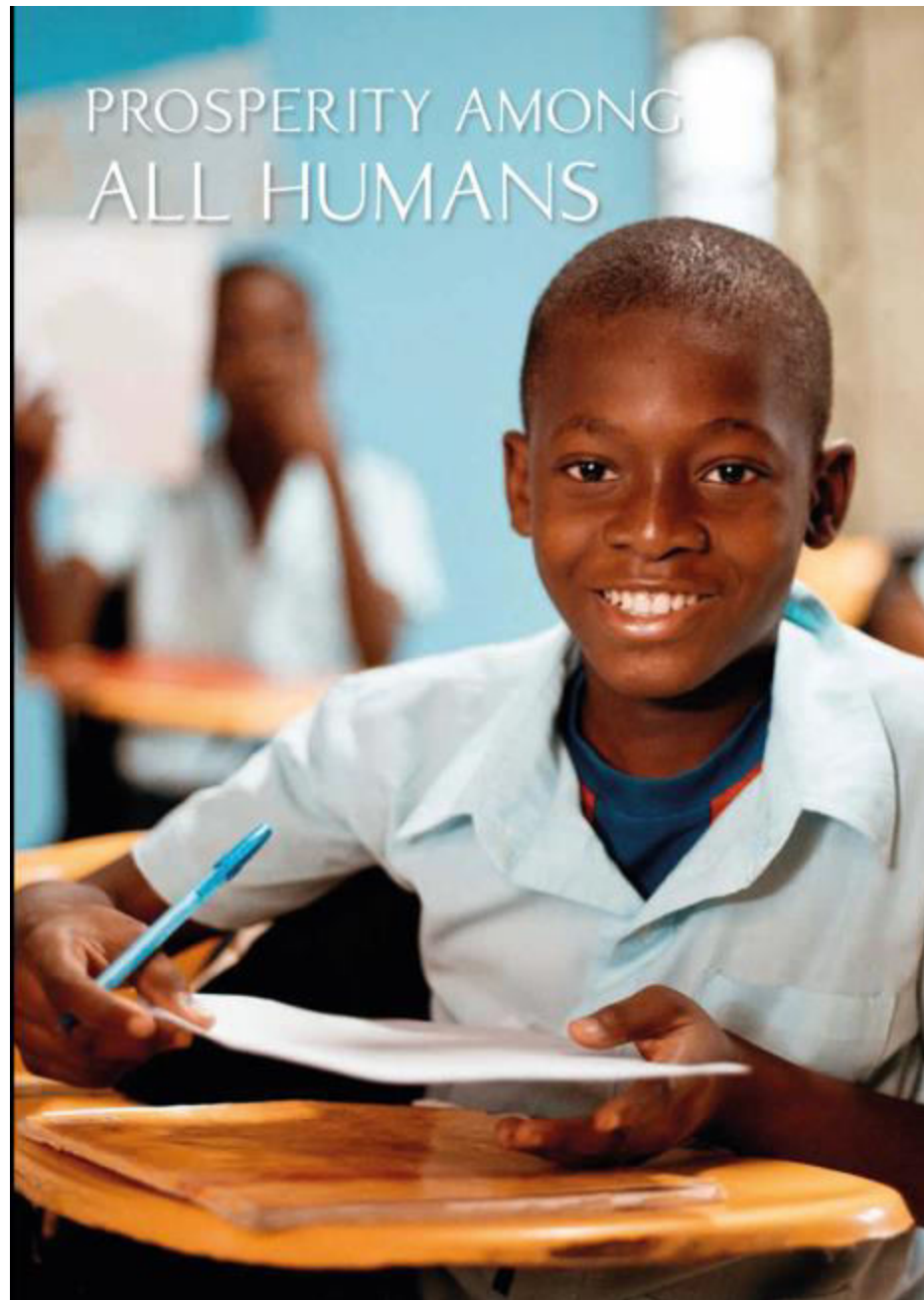
EDUCATION AND SKILLS DEVELOPMENT

In a rapidly changing world appropriate and good education as well as skills development provide a fundamental foundation for any person to be able to take up opportunities that may be presented in life that enables them to improve their lives and that of future generations. This is why Ongava is committed to education that focuses on sustainable development which recognises that what we do today can have implications on the lives of people and the planet in future. This approach empowers people to change the way they think and work towards a sustainable future.

Ongava aims to improve access to quality education at all levels to transform society by reorienting education and help people develop knowledge, skills, values and behaviours needed for sustainable development. This involves including issues such as climate change and biodiversity into teaching and learning where learners and individuals are encouraged to be responsible actors who resolve challenges, respect cultural diversity and contribute to creating a better world.

Education for sustainability is not simply about providing information but involves equipping people with the skills, capacity, and motivation to plan and manage change towards sustainability within an organisation or community. Education should be seen as a lifelong event and education for sustainability is driven by a broad understanding of education and learning that includes people of all ages and backgrounds and at all stages of life and takes place within all possible learning spaces, formal and informal, in schools, workplaces, homes and communities.

To address the above Ongava believes the following aspects related to education and skills development are critical.



Proposed Kindergartens

Early childhood development (ECD) for children between 0 and 6 years plays a critical role in ensuring that children are given a solid foundation to be able to lead full and productive lives. Early childhood development is internationally recognised as the cornerstone for breaking the intergenerational cycle of poverty and is an important investment that needs to be made in order to provide them with the means to succeed in life. Importantly a key objective of Namibia's Vision 2030 is to promote integrated ECD services and to develop the capacity of educators in this area.

To this end Ongava Development Foundation (ODF) proposes to assess the need and feasibility of establishing kindergartens on the resettlement farms where appropriate. Any investment in this area would also include educational materials, training for educators and supplementary support towards providing a balanced nutritional programme, nutrition is key to early childhood development.

One of the biggest problems in Namibia with regards to many learners in the rural areas revolves around nutrition. Nutrition is vitally important to stimulate concentration and participation. In Namibia, government reports indicate that thirty four percent (34%) of children live in poverty compared to 29% of the general population (2012 Child Poverty Report). Poverty can be seen in the high levels of stunting and malnutrition, stunting affects 24% of children under 5 in Namibia.

Proposed Schooling – Grades 1 - 7

In terms of support to the formal education sector ODF will provide support to the already established schools at Werda and Seringkop. This support, although not limited to, could include the following aspects:

- Teaching training programmes, school management, facility maintenance and the functioning of school boards
- Providing free internet services at the school/s and for the vulnerable – widows, orphans and pensioners to access remote banking and other key services.
- Upgrading the existing hostel facilities and addressing the transport issue of children living on adjacent farms
- Providing scholarships to deserving scholars to continue their secondary and tertiary education at schools of excellence in Namibia
- Promoting and encouraging the adoption of education for sustainable development into the existing curriculum





Proposed Community College

Ongava Development Foundation's development programme will offer training in skills that can be employed locally, including those needed by the Hai//om local community – Ongava, and further afield.

TRAINING FIELDS OFFERED	 TELECOMMUNICATION	 MACHINE MAINTENANCE
	 TOUR GUIDING	 CATERING
	 WILDLIFE MANAGEMENT	 LAW ENFORCEMENT
	 HOSPITALITY	 FINANCIAL MANAGEMENT

SIX
CORPORATE SOCIAL PLAN

Tuition will be provided both at the vocational training centre to be established on the Concession and at Ongava Game Reserve.

In addition to vocational or technical skills, ODF will offer programmes to develop financial literacy, time management, and social skills and confidence. High demand skills in hospitality, management, field guiding, and conservation related fields will be offered in modules. The implementation of these programmes will benefit from the experience and established expertise of KAYEC (see <http://kayec.org/home-page/>).

Proposed Healthcare

Access to good reliable healthcare is essential for the Hai//om communities living on these resettlement farms. To this end ODF commits to identifying actions that would complement other ongoing efforts in this regard including the following:

- The reliable provision of safe drinking water and appropriate sanitation facilities
- Support to ensuring that mobile clinic services are operational and run effectively and efficiently. This would also include investigating the feasibility of the provision of ambulance services to the nearest hospital
- An integral aspect of healthcare is nutrition and support to the establishment of vegetable gardens where appropriate will be considered. Providing support to vegetable gardens cannot be undertaken unless a consistent secure water source exists. Previous experience has however indicated that community vegetable gardens do not work mainly because of issues surrounding shared responsibility and benefits. It is therefore recommended that if this action is to be pursued then support to the establishment of a number of individual or household vegetable gardens be considered. Opportunities do exist for these gardens to supply surplus vegetables to the Ongava lodges, schools and to vulnerable sectors of the community, i.e. orphans and HIV patients. A self-sufficiency project is recommended where the vegetable production of Nuchas farmstead will be revived in a partnership with a skilled operator. This component of the CSP initiatives will be included in the Stakeholder assessment.

APPENDIX II. GUIDING PROTOCOL

The Ongava Game Reserve protocol for guiding is applicable for this project because both sites have the same endangered and sensitive species such as rhinos, and dangerous big game moving freely. It will be adapted to specific conditions on the Concession if necessary.



This protocol is a living document which will be adjusted as required from time to time. Its main purpose is to provide best practice guidelines for the way in which we conduct our guiding operations here at Ongava Game Reserve.

According to The International Ecotourism Society (TIES), ecotourism is now defined as ‘responsible travel to natural areas that conserves the environment, sustains the well-being of the local people, and involves interpretation and education’. The underlying premise is that we undertake at all times to tread lightly on the land, in keeping with our mantra of ‘Nature First’. All of our staff are expected to abide by this philosophy which drives everything we do.

What It Means to Be a Guide at Ongava

Since the inception of Ongava Game Reserve we have committed to our mantra of ‘Nature First’, striving to conserve biodiversity, providing a safe haven for rare and endangered species and, through understanding, protecting natural resources for the future of the planet. Ongava is considered one of the finest private game reserves in Namibia, enjoying global recognition for exceptional conservation, ground-breaking research and exciting safari experiences. Our guides play an integral role in these experiences and act as the living link between our guests and the natural world.

As members of the guiding team at Ongava Game Reserve we are in an incredibly privileged position to be ambassadors for our organisation, the country of Namibia and global conservation as a whole. Our guests spend a significant portion of their time with us during their stay here and this provides us with a valuable opportunity to create a lasting positive impression for them. As the saying goes, with this great privilege comes great responsibility, and it is therefore imperative that we conduct ourselves with the utmost professionalism at all times.

Because our guests visit us from all over the world, we will encounter many cultural, religious and political views different from our own. As gracious hosts it is important for us to validate and respect these various different views at all times, even though we may not necessarily understand them. Cultural sensitivity is as important to us as environmental sensitivity. At the same time, we are

encouraged to share our various different Namibian cultures and customs with our guests, as an insight of our way of life makes for a valuable addition to the overall holistic safari experience.

Whilst it is certainly important for the safari experience to be enjoyable and educational, it is imperative for the safety and well-being of our guests to be our overriding consideration at all times.

Some key words to keep with you which embody our mission statement:

AUTHENTICITY
COMMUNICATION
EDUCATION
EMPATHY
ENTHUSIASM
EXCLUSIVITY
GENEROSITY OF SPIRIT
HONESTY
INTEGRITY
KINDNESS
LUXURY
PASSION
PROFESSIONALISM
PUNCTUALITY
RESPECT
SENSITIVITY
TRANSPARENCY
UNDERSTANDING
WELCOMING

Ongava Game Reserve

Ongava Game Reserve was formed in 1991 from four farms on the southern boundary of Etosha National Park, namely Leeupoort, Margo, Tiervlei and Sonop, moving from east to west. These four farms now make up a prolific private game reserve which is 30,000ha (300km²) in size and comprised of mixed grassland, mopane woodland and wooded dolomite hills.

Meeting Our Guests

Personal Appearance and Hygiene

Our guides at Ongava Game Reserve are expected to maintain a neat, tidy and professional image at all times. The following guidelines are to be adhered to during working hours, in guest areas and when driving a company vehicle:

- A suitable pair of working boots is issued by the company, but any appropriate closed shoes which are neutral-coloured may be worn. No flip flops, sandals or other open shoes are permitted as part of the guiding uniform. This is especially important to bear in mind as guides may be required to lift heavy objects or modify their activities to include a bush walk at a moment's notice.
- Neutral-coloured socks which are appropriate for the associated footwear must be worn.

- Uniform shorts and long trousers are issued by the company. The hem of the shorts may not be tailored to sit more than 4 fingers above the knee. Guides may choose whether to wear shorts or long trousers, except whilst hosting indoor dinners, when only long trousers may be worn.
- A neutral-coloured belt must be worn at all times and shirts are to be tucked in.
- Branded uniform shirts are issued by the company and are to be buttoned up to the second button under the collar. Undergarments may be worn for warmth but must be a neutral-coloured and not visible.
- A branded fleece is issued by the company for warmth.
- A branded jacket is also issued by the company for warmth.
- The same ponchos provided to guests may be worn for rain protection.
- A branded cap is issued by the company for sun protection. Other forms of headwear may be worn, provided that they are neutral-coloured and are not branded. Headwear must be removed when indoors and whilst hosting meals.
- Neutral-coloured clothing is defined as colours which appear natural, such as khaki, olive, brown and grey. Bright colours such as red, orange, yellow and blue are not acceptable.
- Sunglasses may be worn outdoors but must be removed whilst indoors or when giving pre-activity safety briefings and orientations.
- Guides are either to be clean shaven or grow a full beard, which must be neatly trimmed. Untidy stubble is unacceptable.
- Hair must be neat, clean and presentable. Long hair is to be tied up.
- Excessive jewellery is not to be worn and any jewellery must be in keeping with the rest of the uniform. No facial piercings other than earrings may be worn.
- Body odour is to be kept under control by using deodorant or anti-perspirant in moderation.
- Proper oral hygiene is to be practiced in order to avoid unpleasant breath. No chewing gum may be chewed in the presence of guests or whilst in guest areas.
- Smokers are to ensure that they do not smell of smoke whilst in the presence of guests.
- Fingernails are to be neatly trimmed.

Airstrip and Self-drive arrivals

A significant portion of our guests arrive at Ongava Game Reserve by air, landing at our very own private airstrip located on the reserve. Arriving in this way is very convenient for them, as it cuts down travel time from Windhoek and other safari destinations, apart from setting the tone for an exclusive safari experience. Their arrival here is also our first 'touch point' opportunity to really and truly impress our guests. In addition, transferring our guests to their respective camp/lodge provides our guides with a valuable opportunity to make a positive first impression and get to know our guests a little better before their first safari activity together. Guides may choose to cover some aspects of their reserve orientation and pre-activity briefing in a more relaxed fashion at this point. Guides are to be at the airstrip 30 minutes before the scheduled arrival time of a flight. Flight times are subject to change at the last minute due to routing and/or passenger changes and may sometimes arrive early. The vehicle must be cleaned beforehand and free from any mud and excessive dust. The seatback pockets are to be checked and any rubbish is to be removed and disposed of appropriately. Seat blankets and ponchos are to be neatly folded and/or stowed away. As soon as the plane is stationary in front of the airstrip terminal and the propeller has come to a complete stop, guides may approach the aircraft and wait for the door to open. Once our guests have alighted from the aircraft, guides are to introduce themselves by name and welcome our guests to Ongava Game Reserve. Guides are then to escort our guests to the airstrip terminal and serve them their choice of hot or cold drinks and point out the bathroom facilities.

After doing so, guides may then return to the aircraft in order to collect luggage for all guests arriving at our airstrip using the luggage trolleys. Once our guests have identified their luggage and are happy that all their items have been offloaded from the aircraft, guides may open the sides of the vehicle and load the luggage after assisting our guests to board the vehicle. Please see the relevant section on radio procedure for arrival. On arrival at the relevant camp/lodge, guides are to assist with transferring our guests' luggage to their rooms whilst the Camp Managers conduct the welcome orientation and safety briefing for our guests.

For guests who are self-driving to Ongava Game Reserve, the maintenance staff will assist with their luggage upon arrival, whilst our Camp Managers conduct the welcome orientation and safety briefing for our guests. The best time for guides to then meet their respective guests is at high tea before the afternoon/evening safari activity departs.

Hosting

Whilst high tea does provide an opportunity for guides to meet up with each other and discuss their plans for the afternoon/evening safari activity, they must understand that their primary responsibility at this time is to host our guests. This may entail asking about their trip up until that point, how their journey to us went, as well as their backgrounds and special interests. It is also another valuable opportunity for guides to cover some other aspects of their reserve orientation and pre-activity briefing in a more relaxed atmosphere.

Mobile phones may only be used in the presence of guests as guiding aids (bird, mammal, astronomy, tracking apps etc), navigational aids (compass, GPS etc), for photography or videography and for emergency communications. Social media and personal communications are not permitted whilst in the presence of guests or in guest areas.

Fraternalisation with guests during their stay at Ongava Game Reserve is strictly prohibited, even if reciprocated. By definition this includes inappropriate messaging, harassment and social media requests. Conduct of this sort is considered grossly unprofessional and has the potential to paint the company in a very negative light.

No alcohol may be consumed by guides whilst they are on duty as they may be required to responsibly drive a vehicle or safely handle a firearm at any time. If invited to enjoy a drink with guests, guides may order non-alcoholic drinks from the bar.

Bushwalks

Bushwalks are an integral part of the safari experience at Ongava Game Reserve, which offer our guests a different perspective of the wilderness and complement our offering of game drives on our private reserve as well as forays into the neighbouring Etosha National Park. Being on foot allows our guests to connect more deeply and intimately with nature, as all humans once did, by walking through it.

Bear in mind that some of our guests may express some trepidation and nervousness about joining a guided walk in the bush. A great way to explain to our guests who have not experienced a bushwalk before is that going on a game drive is like watching a movie, whereas going on a bushwalk is like reading a book. Both are wonderful but very different experiences. Whilst a game drive certainly is action-packed, and allows us to cover large distances and get close to the animals, a bushwalk affords us the opportunity to slow down and discover the smaller details we may ordinarily miss

from the back of a vehicle. It gives us the opportunity to experience the sounds of the bush without the distracting noise of an engine, to interpret any tracks and signs which the animals have left behind or learn more about the interesting uses the indigenous people have for some of the plants. During a bushwalk, guides may also choose to deliberately track and/or approach white rhinoceros and elephant bulls in order to view them on foot, depending on our guests' interest and comfort levels. Obviously, there is an inherent chance that other species or categories of potentially dangerous animals may also be encountered during a bushwalk, but these may not be deliberately tracked or approached on foot. Guides are encouraged to be transparent with our guests and explain to them that some animals do present a higher level of risk when approached on foot, and we choose to avoid these encounters as far as possible for their safety. Guides are to leave the area and modify their walking route if the following animals are accidentally encountered during a bushwalk:

- Lion
- Leopard
- Black rhinoceros
- Elephant breeding herds

Bushwalks are flexible and may be tailored to entail anything from a one-hour stroll in the bush to a full-day trek from sunrise to sunset, depending on our guests' interest and fitness levels. For safety reasons, however, bushwalks may only take place during the hours of daylight and not before sunrise or after sunset. Good visibility is critical in terms of maintaining good situational awareness and ensuring the safety of our guests. Bushwalks may be conducted as stand-alone safari activities by themselves or they may be combined with a game drive. A combination that we have found to work well is heading out on an early morning game drive, enjoying a coffee/tea break halfway and then walking back to the lodge from there in time to enjoy a late breakfast.

The lower age limit for bushwalks at Ongava Game Reserve is 12 years of age. This is unfortunately not negotiable and the decision is not at the discretion of the guide. Any children between the ages of 12-17 years old must also be accompanied on these activities by a parent or legal guardian.

The upper age limit for bushwalks at Ongava Game Reserve is 65 years of age. Ongava Game Reserve reserves the right to request that our guests older than 65 years of age provide proof of a medical certificate from a registered health care practitioner to confirm that they are physically fit to partake in an activity which may entail moderate physical exertion in potentially high temperatures. This is at the discretion of our guides in consultation with camp management.

The maximum number of guests we can accommodate on a bushwalk is limited to six. Families or groups of more than six guests travelling together will be required to hire a second guide and rifle to join them. The number of participants is limited for safety reasons, as groups of more than six people (including the guide) walking through the bush become increasingly more conspicuous and threatening towards any animals that may be encountered. Plains game species will be more likely to run away from larger groups of people and dangerous game species are more likely to act in an aggressive manner if they become aware of a larger group. A larger group also becomes increasingly more difficult to control and it becomes increasingly more difficult for our guides to protect all of them in an emergency situation.

In order to conduct bushwalks or any other guiding activity on foot at Ongava Game Reserve, it is imperative that guides must first complete and then remain up to date with the following prerequisite internal training:

Advanced Rifle Handling

The Advanced Rifle Handling certification consists of seven exercises, which must all be completed within the stipulated time and accuracy requirements:

- Exercise 1 - Blindfolded Quick Loading (Level 1)
- Exercise 2 – Accuracy (Level 1)
- Exercise 3 – Distance (Level 1)
- Exercise 4 - Immediate Action (Level 1)
- Exercise 5 - Double Shoot (Level 1)
- Exercise 6 - Simulated Charge (Level 1)
- Exercise 7 - Night Shoot (Level 1)
- Exercise 8 – Jungle Lane (Level 2)
- Exercise 9 – Theoretical test (Level 1 & 2)

Candidates must be declared competent for each exercise in succession, before moving on to attempt the next exercise. There is no limit as to the number of times a candidate may attempt an exercise. This will, however, be dependent on time and ammunition constraints. The expiration date of the certification will, however, reflect the date on which the candidate commenced the first exercise and not the date on which the certification was completed.

The Advanced Rifle Handling certification expires after a period of two years and must be renewed in order to remain current. Advanced Rifle Handling assessments may only be conducted and signed off by the Guide Manager/responsible person.

Logbook Shoots

Candidates must also complete a logbook shoot every second month in order to remain current, which consists of three exercises requiring ten shots to be fired in total:

- Grouping exercise (4 shot grouping on a 15-metre target)
- Distance exercise (15-metre, 10-metre, 5-metre targets untimed)
- Distance exercise (15-metre, 10-metre, 5-metre targets timed)

The performance of each candidate on their logbook shoot does not affect the validity of their Advanced Rifle Handling certification, but the logbook shoots do need to be completed in order for their Advanced Rifle Handling certification to remain valid. Logbook shoots may be supervised and signed off by the Guide Manager/responsible person or one of the Head Guides.

Logged Hours and Encounters

In this phase of this process candidates are required to log a minimum of 50 walking hours on the reserve as an observer, with the Guide Manager or one of the Head Guides leading the walk as 1st rifle. It is not necessary for candidates to complete the Advanced Rifle Handling certification before commencing this phase, as it is not necessary for them to carry a rifle at this stage. During this phase they will also need to log a minimum number of potentially dangerous game encounters as follows:

- 5 white rhinoceros encounters
- 5 elephant encounters
- 1 black rhinoceros encounter
- 1 lion or leopard encounter

Once all minimum requirements have been met and signed off by the Guide Manager/responsible person, including the Advanced Rifle Handling certification, candidates will be required to undergo a practical assessment which will evaluate their ability to safely conduct a bushwalk based on the following criteria:

- Minimum required equipment
- Guest check and safety briefing
- Safe rifle handling and etiquette
- Situational awareness
- Route selection and navigation
- Group control
- Interpretive commentary

The practical assessment must include at least 10 hours of walking on the reserve divided between both the 1st rifle and 2nd rifle positions. During the assessment the candidate will be required to safely approach, view and extract from at least one white rhinoceros encounter and at least one elephant bull encounter whilst in the 1st rifle position. Once the candidate has been declared competent and they have been signed off by the Guide Manager, they will be considered a fully-fledged guide and they will be permitted to guide our guests on foot within Ongava Game Reserve.

Procedure

Before departing for a bushwalk, guides are to post the following information on the OGR Guiding WhatsApp group and also record the following information on the whiteboard above the rifle safe in each of the camps/lodges:

- Date
- Guide's name
- Number of guests and their room numbers
- ETD/ETA
- Area where you will be walking

Guides are to sign their rifle in and out of the weapon safe each time they remove it from or return it to the safe and record the details in the weapon register kept on top of each safe. Head Guides are to ensure that there are always sufficient sheets available in the registers and that they are being filled in correctly.

Guides may decide to walk directly from the camp/lodge or drive out first and commence the walk from another location on the reserve. They may then either walk back to the camp/lodge or to another pre-arranged location where a vehicle has been left for them.

Before the start of each bushwalk, guides are to announce that they are about to commence a walk over the radio, as per the radio procedures. Other guides who may be conducting game drives at that time are requested to avoid that particular area as far as possible for the duration of the bushwalk, in order to avoid negatively affecting the safari experience for our guests.

Once the bushwalk has been completed, guides are to announce that they are safely back on the vehicle or at the lodge over the radio.

Guest Check and Pre-walk Safety Briefing

Sometime well before the start of each bushwalk, guides are to conduct a guest check which will ensure that our guests arrive adequately prepared. It may be necessary to do this in private with each guest, as the information discussed may be confidential and sensitive in nature. The following points of information are to be included:

- Expected duration of the walk
- Meeting point and departure time
- Weather predications and expected terrain
- Drinking water (at least 2 litres per person)
- Adequate clothing such as hats and closed shoes
- Sunscreen and insect repellent
- Binoculars and camera
- Pre-existing injuries, medical conditions and allergies
- Phobias (such as elephants, snakes, spiders etc)
- Special interests

It is also very important for guides to deliver a thorough pre-walk safety briefing to our guests before the start of each bushwalk, which includes the following key information points:

- Explain the shift in mindset from being an observer on a game drive to being a participant on a bushwalk. It is now important to remain vigilant at all times, although the focus is generally not on finding large potentially dangerous animals. Explain how animals perceive the group on foot and how different species are likely to react if they become aware of your presence.
- Address the 'elephant in the room'. Many of our guests, especially those from European countries, are not accustomed to seeing firearms and may feel nervous in the presence of one. Explain why you are carrying a rifle, then show how you load the weapon and make it safe for carrying. Make sure that our guests know that the rifle is off-limits for their own safety.
- Our guests must stay behind the rifle at all times for their own safety.
- Walking formation is in single file, behind the guide. Do not lag behind the rest of the group and try to keep a distance of no more than two metres between each participant. Walking in single file ensures that the group appears less intimidating to any animals we may encounter and makes it easier to avoid uneven terrain and thorny branches.
- Probably the most important rule is not to run under any circumstances... unless your guide tells you to! Generally, the best way to handle a situation in which a dangerous animal has become aggressive is to stand your ground, especially during a 'warning charge'. Our guests are to immediately obey any commands their guide may give for their own safety.
- Whilst the walk will provide many valuable opportunities to discuss things which we may find in the bush, the group must come to a stop before having these discussions and conversations. Talking whilst on the move through the bush can be very dangerous, as it will affect the guide's ability to concentrate and listen out for subtle sounds which may alert them to potential danger up ahead. As a rule, 'if we are walking, we should not be talking... and if we are talking, then we should not be walking!'.
- Because we walk mostly in silence, communication takes place by means of hand gestures. Explain the different hand gestures the guide may use to bring the group to a stop, ask everyone to lower their profile, move backwards or sideways etc. Our guests are to avoid calling out their guide's name if they see something, would like to stop for a photo or to ask a question. This may give your presence away and attract the attention of potentially dangerous animals so it is preferable to click fingers, whistle softly or make a 'psst' sound to attract your guide's attention.
- Our guests are welcome to take their mobile phones along to use as cameras, but mobile phones must be put on flight mode (not silent mode) whilst on a bush walk. Remember to stop your guide if you would like to stop and take a picture.
- Reassure our guests that you are carrying a functional first aid kit and spare drinking water should they need it, as well as a fully-charged handheld radio. Explain how to use the radio in case you are incapacitated and they need to call for help.
- Go over the plan with our guests and reiterate which area you plan to walk through, the planned duration of the walk, planned breaks/stops etc.
- Ask if anyone has any questions and make sure that everybody understands before setting off.

Equipment

The following minimum equipment is to be carried by guides during all guided bushwalks:

- Clean and operational rifle with a minimum calibre of .375 H&H Magnum
- 10 cartridges loaded with monolithic brass solid bullets (5 cartridges loaded in the rifle magazine and 5 cartridges carried in an ammunition pouch on the belt)
- Backpack with a minimum capacity of 30 litres
- Fully-charged handheld radio
- Fully-stocked first aid kit
- Personal water bladder with at least 2 litres of water
- Water bottle/s with at least 1 litre of extra water per guest
- Binoculars
- SPF30 sunscreen
- Insect repellent
- Toilet paper

It is imperative to carry only cartridges loaded with monolithic brass solid bullets whilst conducting bushwalks or other safari activities. Soft-point or soft-nosed bullets are not acceptable as carrying cartridges because they are not able to deliver the penetration performance required to ensure the immediate immobilisation of large, thick-skinned animals in emergency situations. Any bullets of suitable calibre may, however, be used for practice and/or assessment shoots at our designated Ongava Game Reserve shooting range and this will largely be driven by the most cost-effective and readily available options at the time. The date on which carry rounds are issued to the camps/lodges is to be recorded and carry rounds must be shot out or replaced every two years. Head Guides are to monitor the condition of carry rounds being used at each of the camps/lodges and report any faults or issues to the Guide Manager.

Vehicles

All guides are required to complete the basic daily vehicle checklist every day before the morning safari activity. The more comprehensive weekly vehicle checklist must be completed every Sunday and all checklists will be collected from each of the camps/lodges every Monday.

Game Drives - Ongava Game Reserve

Off-road Driving

At no time is a guide to drive off-road in areas where the risk of environmental impact or damage to company property is too great e.g., excessively thick bush and rocky areas. No off-road driving is permitted on any open areas/plains at any time, especially the following open areas:

- Leadwood Clearing
- Leopard Clearing
- Naunyango Clearing
- Talcum Powder Flats
- OTC Clearing & Hwane Clearing
- Allen Dam Clearing
- Tiervlei Clearing (North and West)
- Sonop Clearing

Off-road driving is not to be undertaken lightly and should only be done in order to enhance a high-profile sighting where the visual is poor and not likely to improve in the immediate future. If a sighting is somewhat distant but the visibility is good, our guides are expected to use their discretion and avoid unnecessary off-road driving. If the visual is poor but a sighting is moving towards a more open area or road and the visual is expected to improve, our guides are to use their discretion and avoid unnecessary off-roading.

Off-road driving is permitted for the following high-profile species:

- Lion
- Leopard
- Cheetah
- Spotted Hyena
- Brown Hyena
- Elephant
- White Rhinoceros
- Black Rhinoceros

Once-off exceptions may be made for exceptional sightings e.g., a python with a kill, but these instances must be reported to one of the Head Guides or the Safari Manager upon completion of that particular game drive.

Once a guide has decided that off-road driving is warranted in that particular instance, they are to 'snake' through the bush for the first 20-25m after leaving the road network. The reason for this is one of aesthetics and will ensure that the resulting off-road tracks have a minimal visual impact for other guests whose safari activities may take them past these sites at a later stage. After the first 20-25m the guide may resume with a more direct path of travel. After off-roading for a stationary sighting, guides are to return to the road network along the same off-road tracks they created when entering the sighting. Any other guides entering the sighting subsequent to this are also to follow these same tracks.

The first guide to go off-road for a particular sighting takes responsibility for the rehabilitation of those particular tracks. They may request that any other guides who entered the same sighting afterwards also join them in order to assist with the rehabilitation efforts, but the ultimate responsibility lies with that guide to make sure that the tracks are properly rehabilitated within one week after the animals have moved off. The same applies if a guide causes damage to a road by getting stuck and creating deep ruts. Ongoing training will be provided by the Guide Manager and/or Reserve Manager in order to clarify what constitutes proper rehabilitation.

Speculative off-road driving is not permitted under any circumstances i.e., guides may not drive off-road on the mere suspicion that there may be a high-profile sighting in the area. Before making a decision to drive off-road, guides must first visually confirm the presence of a high-profile sighting. Guides may not leave their guests unattended in the vehicle at any time in order to track a high-profile sighting on foot, but they may assess tracks within sight of the vehicle and their guests.

If a path is blocked by small trees/shrubs whilst driving off-road, guides may proceed by driving over these whilst keeping them between their wheels and not crushing them under the weight of the vehicle. Guides are to avoid driving over any trees or shrubs which are thicker than 80mm in diameter whilst off-roading. As a general rule, this is approximately the thickness of your wrist. Trees or shrubs which are thicker than that are generally more rigid and may snap when driven

over. Some tree species are protected by law or may be very slow-growing and are therefore considered sensitive. The following tree species may not be driven over under any circumstances, even when young:

- *Combretum imberbe* (Leadwood)
- *Berchemia discolor* (Bird Plum)
- *Sterculia Africana* (African Star Chestnut)
- *Steganotaenia araliacea* (Carrot Tree)
- *Moringa ovalifolia* (Phantom Tree)
- *Commiphora mollis* (Velvet Corkwood)
- *Commiphora glaucescens* (Blue-leaved Corkwood)
- *Commiphora glandulosa* (Tall Common Corkwood)
- *Pachypodium lealii* (Bottle Tree)
- *Euphorbia virosa* (Candelabra Euphorbia)
- *Euphorbia guerichiana* (Paperbark Euphorbia)

Driving off-road in order to create a shortcut between two particular roads or areas is not permitted. If a guide feels that there would be merit to creating a new road in order to improve and/or streamline the game viewing experience, they may bring this to the attention of the Guide Manager or Reserve Manager and these suggestions will be considered on a case-by-case basis. Driving around puddles or muddy stretches of the road, and creating a parallel road or widening the existing road by doing so, is a serious offence and guides found to be guilty of this will face disciplinary action.

Only marked Ongava Game Reserve vehicles are permitted to drive off-road on the reserve. Private vehicles and vehicles driven by overland guides are not permitted to do so.

General regulations with regards to Game drives

- Maximum of three vehicles at any sighting.
- The guide who first arrives at the sighting or who is there the longest is in charge of the sighting.
- The speed limit on OGR is 40km/h, in Etosha it is 60km/h
- Flash photography: this can upset animals, especial predators. Use of a flash is at the guide's discretion: if it threatens the animal, it is not permissible.
- Sundowners: For the safety and serenity of guests, Sundowners are to be no less than a kilometer away from a known sighting of either, Rhino, Lion, Leopard and Cheetah. This is to give guests at the sighting the opportunity to view animals serenely without being disturbed, as well as providing a safe environment for guests to enjoy their Sundowners without the threat of coming into contact with a Potentially Dangerous Animal.
- Spotlights: It is acceptable for the guide to use the spotlight without the RED filter while in search of animals. Once an animal is found the RED filter must be used while viewing the animal. Most animals of the African bush are diurnal animals (active during the day) and their eyes are not adapted to the night. Therefore, it is important to use a RED FILTER which dampens the affects of the harsh white light so the animals' eyes are not blinded by the white light.
- OGR EIA information collection and analysis: the RM will make available each month a detailed map showing closed roads, out of bounds areas and other critical information for guides. This document will also provide the means for the collection of vital information on road usage and animal sightings, which is necessary for proper management of the Reserve and will also serve to enhance the guest's experience. It is compulsory for guides to fill these forms in. They will be collected monthly by the lodge manager and analyzed by the RM who will then make the results available to the guides.

Restricted Areas

The following areas are restricted and are out of bounds for game drives and bushwalks:

- Ongava Game Reserve headquarters at Tiervlei
- The boma east of Tiervlei
- Stu's gyrocopter airstrip
- Margo House
- Staff accommodation at all camps/lodges
- Waterholes in front of all camps/lodges (unless there are no guests in camp and/or clearance has been authorised by the relevant Camp Management)

Game Drives - Etosha National Park

Game drives within Etosha National Park are subject to all standard park rules and regulations that apply to all members of the public who utilise the park. Ongava Game Reserve guides are no exception to those rules and regulations. In fact, as ambassadors for our organisation, our guides are expected to set an excellent example to both the public as well as our guests in terms of upholding these regulations.

Radio Procedure

Guides are encouraged to avoid incessant and/or inappropriate use of the radio whilst guiding safari activities. Radios can be extremely annoying for our guests and intrusive to the overall safari experience. When used poorly they represent a massive disservice to our guests as well as reflecting poorly on the overall standard of our guiding. Constant radio usage tells our guests:

- That their guide lacks confidence in his/her ability to find animals by utilising his/her knowledge, skills and experience.
- That their guide is chasing big game sightings and ignoring the many smaller wonders of the bush which they have come to discover and learn about.
- That their guide is more interested in talking to the other guides than engaging with them.

We are confident in our guides' ability to deliver a world-class safari experience, which both delights and surprises our guests, without using a radio in order to do so. Our guides are individually equipped with the knowledge, skills, experience and training to consistently exceed our guests' expectations. Having said this, our vehicles are equipped with radio sets which allow each guide/vehicle to communicate with other guides/vehicles and with the lodges/camps. This is primarily for reasons of safety and logistics but, when used correctly, the radio can also facilitate teamwork during tracking efforts and drastically improve the success rate of locating high-profile sightings in order to ensure excellent game viewing.

The only language acceptable on the designated guiding channel is English. The reasons for this are numerous.

- In an operational sense, using only English over the radio ensures that all communication is clearly understood and reduces the need to repeat transmissions for those who did not understand the original message.
- We also share English as a common language with the vast majority of our guests and by speaking English over the radio we choose to include our guests in the conversation so as to make them feel welcome. Speaking cryptically in other languages over the radio may be misconstrued as rude by our guests and they may feel as if we are hiding things from them and insulting their intelligence.

The following radio channels are applicable to you and are programmed into all game viewing vehicles and handheld radios which may be assigned to you:

- Channel 1 - Etosha Guiding
- Channel 2 - Camp Managers
- Channel 3 - Ongava Guiding
- Channel 4 - Simplex (Line of Sight)

Guides are to announce their presence on the reserve over the radio as they commence with each safari activity i.e., at the start of each guided bush walk, morning and afternoon game drive. When guides move into Etosha National Park as their area of operation, they are to announce their presence over the radio. The following information is to be included in these announcements:

- Their first name or nickname only
- The camp/lodge they are departing from
- The general area where they plan to operate that particular activity
- They may also request any sightings updates

When approaching the respective lodge/camp with guests near the end of a safari activity or after picking guests up from the airstrip, guides are to radio the respective Camp Manager or Assistant Camp Manager and provide both a 15-minute ETA and then a 5-minute ETA (expected time of arrival). This is in order to allow adequate time for the Camp Managers or Assistant Camp Managers to prepare for our guests' imminent arrival and welcome them appropriately. Guides are to relay how many guests they are travelling with but are to avoid using the terms 'pax' or 'clients'. These are impersonal terms and do not adequately reflect to our guests how much we value them and their presence here. We are only to use the term 'guest/s' when referring to our guests.

When calling in high-profile sightings over the radio, stations are to begin their transmission with the phrase "standby for sightings update". The following information is then to be included as accurately and concisely as possible:

- Species
- Gender, age and group composition (male/female/juvenile)
- Exact location
- Activity (mobile/feeding/stationary/sleeping)
- Direction of movement if mobile
- Visibility rating on a scale of 0-5 (0/5 being no visual and 5/5 being a perfect view)
- Best approach/access to the sighting

The maximum number of three stations (vehicles) applies to all high-profile sightings and any particular area at one time. This is in order to ensure the exclusivity of the guest safari experience and to minimise any disruption to the natural behaviour of the animals being viewed. If the station in charge of the sighting feels that the sighting is a sensitive one e.g., because an animal is behaving nervously/aggressively, has very young offspring in the vicinity or because visibility is reduced, then they may reduce the number to a two-vehicle or one-vehicle sighting at their discretion.

General

All guides must be in possession of a valid and up-to-date first aid certificate not older than three years in order to legally operate within Ongava Game Reserve and Etosha National Park. This certificate must be issued by a certified first aid training provider.

All guides must be in possession of a valid and up-to-date driving licence with a Professional Authorisation (PA) for Passengers in order to legally operate within Ongava Game Reserve and

Etosha National Park. This endorsement was previously known as a Public Driving Permit (PDP) and must not be older than two years.

All guides will be required to undergo a medical fitness evaluation on an annual basis at the company's expense. If any guide is found to be physically unfit to guide guests at any time, they will be moved to a different department within the company structure, as operational requirements allow.

Mentorship is an important part of the development process for all guides at Ongava Game Reserve, especially guides who are new to our team. The most valuable method of learning is through directly observing each other in our job roles. All guides are therefore encouraged to join each other's safari activities, provided that there is space available and that the guest experience is not compromised or negatively affected in any way.

All staff who can be spared operationally are expected to assist immediately in the event of a fire on Ongava Game Reserve or any of the surrounding reserves/farms. We try to assist our neighbours in extinguishing fires on their properties whenever possible in order to maintain good neighbourly relations. Their reciprocal assistance is incredibly valuable to us in case of an emergency. Any fire-fighting efforts will be co-ordinated by the Reserve Manager.

Acknowledgement

As a member of the guiding team at Ongava Game Reserve, I hereby acknowledge that I have read and understood this Guiding Protocol document and I undertake to abide by it at all times. I understand that failure to adhere to the rules and regulations contained herein may result in disciplinary measures being taken by the company.

Name: _____

Date: _____

Signature: _____

Witness Signature: _____