



UPDATED ENVIRONMENTAL MANAGEMENT PLAN

FOR THE OPERATION OF THE EXISTING PELICAN POINT LODGE AND ASSOCIATED FACILITIES AT WALVIS BAY, ERONGO REGION



Prepared for: Pelican Point Lodge March 2025



Title	ENVIRONMENTAL MANAGEMENT PLAN (EMP) FOR THE OPERATION OF THE EXISTING PELICAN POINT LODGE AND ASSOCIATED FACILITIES AT PELICAN POINT, WALVIS BAY, ERONGO REGION		
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ABBREVIATION

AIDS	Acquired Immune Deficiency Syndrome
DEAF	Department of Environmental Affairs and Forestry
EA	Environmental Assessment
EAP	Environmental Assessment Practitioner
ECC	Environmental Clearance Certificate
ECO	Environmental Compliance Officer
EIA	Environmental Impact Assessment
EMA	Environmental Management Act
EMP	Environmental Management Plan
HIV	Human Immunodeficiency Virus
KM	Kilometers
MAWLR	Ministry Agriculture, Water and Land Reform
MEFT	Ministry of Environment, Forestry and Tourism
MFMR	Ministry of Fisheries and Marine Resources
NAMPORT	Namibia Port Authority
PPE	Personal Protective Equipment

Tables of Contents

1. INTRODUCTION	5
2. PROJECT LOCATION.....	7
4. COMPLIANCE TO THE EMP	9
5. LEGAL AND POLICY FRAMEWORK	11
6. ROLES & RESPONSIBILITIES	20
6.1 Environmental Compliance Officer (ECO).....	20
6.2 The Proponent	20
6.3 Environmental Manager	20
6.4 Employees and Contractors	21
7. DISCIPLINARY ACTION.....	21
8. THE ENVIRONMENTAL MANAGEMENT PLAN.....	21
SECTION A: STAFF INDUCTION	22
SECTION B: HEALTH AND SAFETY	25
SECTION C: POLLUTION CONTROL AND WASTE MANAGEMENT	35
SECTION D: ENVIRONMENT	47
SECTION E: HERITAGE AND ARCHEOLOGICAL RESOURCES.....	50
SECTION F: SOCIO ECONOMIC	52
SECTION G: DECOMISSIONING/CLOSURE.....	54
9. CONCLUSION AND RECOMMENDATIONS	57

List of Figures

Figure 1: Location of the existing Pelican Point Lodge and associated facility at Walvis Bay, Erongo region (GPS coordinates 22°.89175 S, 14°.435417 E).....8

Figure 2: The existing Pelican Point Lodge and associated facility at Erf Namport, Walvis Bay, Erongo region.....8

List of Tables

Table 1: List of triggered activities identified in the EA process which apply to the envisaged project.6

Table 2. Legal requirements for the proposed operation of the existing Pelican Point Lodge and associated facilities at Walvis Bay, Erongo region.....10

Table 3: Staff Induction Mitigation Measures.....21

Table 4: Health and Safety Measures to be implemented24

Table 5: Pollution and Waste Management Mitigation Measures.....34

Table 6: Environmental Mitigation Measures to be implemented.....46

Table 7: Archaeology and Heritage Mitigation Measures.....49

Table 8: Social Economic Mitigation Measures.....51

Table 9: Decommissioning/closure Mitigation Measures to be implemented.....53

1. INTRODUCTION

Pelican Point Lodge operates the existing eco-lodge and associated facilities at Walvis Bay in Erongo region. The lodge is situated on a parcel of land measuring about 865.00 m² and it is located approximately 15 Km west of Walvis Bay in Erongo region. The proponent will operate a lodge and associated facility which comprises of an office/reception, 9 guest rooms, kitchen, mini-bar and restaurant/lounge. In addition, there are staff quarters at the facility that consist of three rooms and two separate toilets for male and female. The staff quarter is situated on the northern side of the facility. Other, additional facilities found at the lodge includes; a laundry room, a mini-desalination plant, storeroom, waste room and a light house.

The essence to operate an eco-lodge and associated facility is mainly enhance tourism activities in Walvis Bay as well as diversifying economic activities and positively contribute to the improvement of the quality of life for the local community and provide recreational benefits in the town. The project further aims to provide the much-needed employment opportunities to the residents of Walvis Bay.

The proponent (Pelican Point Lodge) which is the subsidiary of the umbrella company (Pelican Point Lighthouse) has through extensive market research determined that there is limited high-end tourism facility in the town. The two entities then entered into an agreement whereby the Pelican Point Lodge operates the property whereas the umbrella company engaged Namport to lease the property merely for tourism purposes. This initiative culminated in the proponent to operate the leased property from Namport after following all legitimate process. The lodge will have a huge economic impact to the town of Walvis Bay and boost high-end tourism in the town which include luxury tourism package. The lodge will employ about 10 permanent employees during its operational phase. However, cumulative jobs are anticipated due to the nature of the facility that require constant maintenance, waste management, tour guiding and car rental services. The lifespan of the project is not yet determined; however, the proponent will have a robust marketing strategy to ensure and maintain its sustainability.

The accessibility to the lodge will be gained from the D1986 road that stretches from Walvis Bay townland and pass Walvis Bay Salt Works factory through the pan and turn to the right at

the end of the D1986 and use the peninsula that stretches from 1st Paal Fishing Area all the way to Pelican Point for approximately 10 Km.

The operation of the lodge will include listed activities in terms of Namibia's Environmental Management Act (No. 7 of 2007) and EIA regulations (GN 30 of 6 February 2012). Therefore, an Environmental Clearance Certificate (ECC) from the Office of the Environmental commissioner, Department of Environmental Affairs and Forestry (DEAF) within the Ministry of Environment, Forestry and Tourism (MEFT) is required and this prompted the Environmental Assessment (EA) to be conducted.

Pelican Point Lodge (Pty) Ltd, hereinafter referred to as the proponent intends to carry out the following activity:

- **Environmental Management Plan (EMP) for the operation of the existing Pelican Point Lodge and associated facilities at Walvis Bay, Erongo region.**

Environmental Assessment is needed in order to assess the potential social, economic and environmental impacts associated with the intended operation of the Pelican Point Lodge and associated facility to provide measures on safety, health and environmental impacts associated with the envisaged project.

The above is a listed activity in terms of the Environmental Management Act (No. 7 of 2007) and Environmental Impact Assessment Regulations (Government Notice No. 30 of 2012).

In terms of the Environmental Management Act (No. 7 of 2007) and Environmental Impact Assessment Regulations (Government Notice No. 30 of 2012), the following listed activities in **Table 1** were triggered by the proposed development:

Table 2: List of triggered activities identified in the EA process which apply to the envisaged project.

Activity description and No(s):	Description of relevant Activity	The portion of the development as per the project description that relates to the applicable listed activity
Activity 6 (Tourism development activities)	The construction of a lodge or other tourism and hospitalities facilities.	The proposed project entails the operation of the existing Pelican Point Lodge and associated facility for tourism purposes.

Activity description and No(s):	Description of relevant Activity	The portion of the development as per the project description that relates to the applicable listed activity
Activity 8.1 (Water resource developments)	The abstraction of ground or surface water for industrial or commercial purposes.	The proposed project entails the operation of the existing borehole at Pelican Point for the purpose of supplying water to an existing lodge and associated facility for tourism purposes.
Activity 8.12 (Water resource developments)	The release of brine back into the ocean by desalination plants	The proposed project entails the operation of an existing mini-desalination plant that release water back into the ocean as an effort to reduce salinity level to acceptable drinking water standards.

An Environmental Management Plan (EMP) is one of the imperative outputs of the EA process as it details all of the proposed mitigation and monitoring arrangements, establish timeline as well as explicit dispensed tasks. This EMP provide the mitigation and monitoring actions to be applied during the subsequent phases of the intended project:

- Operational phase - the period during which the proponent commenced with the operation of the eco-lodge and associated facilities.

The rehabilitation of the of the eco-lodge and associated facilities is not anticipated to take place once the facility commences with its operation although continuous maintenance is recommended. It is further suggested that the subject area assumes economically viable alternative uses and not cause adverse hazard to local people optimising this land; when the facility ceases its operation, some suggested recommendation is detailed in this EMP.

2. PROJECT LOCATION

The existing Pelican Point Lodge and its associated facility is situated at Erf Namport, Pelican point approximately 15 Km west of Walvis Bay, Erongo Region (see **Figure 1** below for the site).

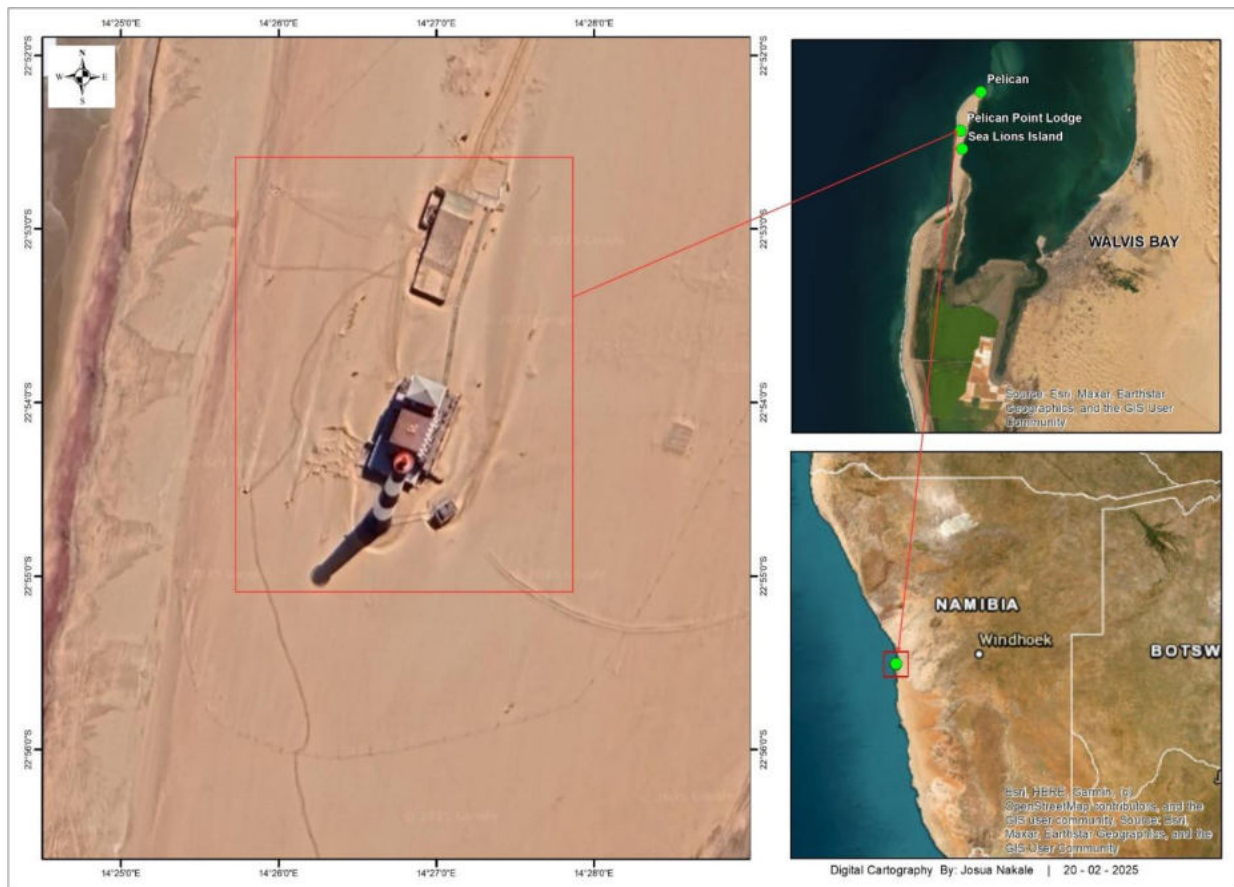


Figure 2: Location of the existing Pelican Point Lodge and associated facility at Walvis Bay, Erongo region (GPS coordinates 22°.89175 S, 14°.435417 E).

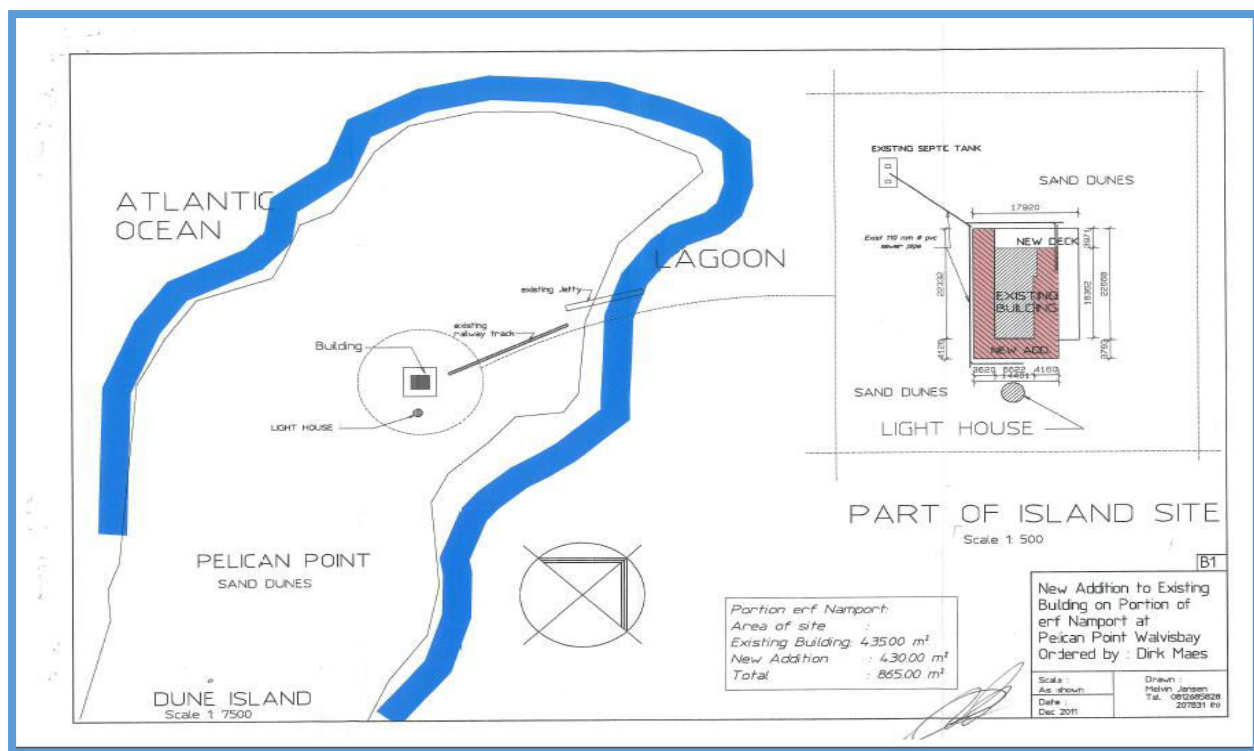


Figure 2: The existing Pelican Point Lodge and associated facility at Erf Namport, Walvis Bay, Erongo region.

3. PURPOSE OF THE EMP

The Environmental Management Plan (EMP) contains the empirical measures that must be carried out to ensure that the negative impacts associated with the project are reduced to negligible while the positive impacts are amplified. The EMP details the mitigation approach, monitoring actions and management control programs that have been formulated with the purpose of minimizing the possible environmental impacts that may emerge as a result of the suggested project. In addition, the roles and responsibility of persons liable for in the proposed operation of the existing Pelican Point Lodge and associated facilities at Walvis Bay, Erongo region.

4. COMPLIANCE TO THE EMP

This EMP is a living and a legal binding document as specified under the provisions of the Environmental Management Act, 2007 (Act No. 7 of 2007). Therefore, compliance with the EMP ensure that the proponent adhere to all applicable environmental legislation as well as to the suggested mitigation measures that are detailed in this document. The proponent should be cognizant that the EMP is subjected to amendment depending on the changes with the

state of the environment and new information that may be imminent, hence, it must be reviewed and updated accordingly with the provision of the EMA.

5. LEGAL AND POLICY FRAMEWORK

The proposed project shall be operated under the provision of the relevant statutory framework of Namibia and international laws of which Namibia is signatory.

5.1 Applicable and relevant statutory framework of Namibia

Table 2. Legal requirements for the proposed operation of the existing Pelican Point Lodge and associated facilities at Walvis Bay, Erongo region.

Legislature/Policies	Relevant provision	Project Implication
The Constitution of the Republic of Namibia	Article 95(1) of the Constitution of Namibia states that: “The State shall actively promote and maintain the welfare of the people by adopting policies aimed at the maintenance of ecosystems, essential ecological processes and biological diversity of Namibia and utilization of living natural resources on a sustainable basis for the benefit of all Namibians, both present and future”. Article 91 (c) provides for duty to guard against “the degradation and destructions of ecosystems and failure to protect the beauty and character of Namibia”.	To undertake the EA in order to maintain the ecological process and diversity of ecosystem. The proponent shall advocate for sound environmental management as stipulated in the Constitution through the implementation of the environment management plan prepared for this project. The operation the existing Pelican Point Lodge and associated facilities

		should be done in a sustainable manner to ensure that the beauty of the area and/or Namibia is maintained.
Environmental Management Act No. 7 of 2007 (EMA)	<p>Section 2 outlines the objective of the Act which is to promote the sustainable management of the environment and the use of natural resources by establishing principles for decision-making on matters affecting the environment; to provide for a process of assessment and control of projects which may have significant effects on the environment. The Act gives legislative effect to the Environmental Impact Assessment Policy.</p> <p>Additionally, the act also provides procedure for adequate public participation during the environmental assessment process for the interested and affected parties to raise and register their opinions and concern about the proposed project.</p>	The management of this project must be informed by the EMA.
EIA Regulations GN 28, 29, and 30 of EMA (2012)	GN 29 Identifies and lists certain activities that cannot be undertaken without obtaining an environmental clearance certificate. GN 30 provides the regulations governing the environmental assessment (EA) process.	The operation of the existing lodge and associated facilities is one of the listed activities hence this EIA study.

Environmental Assessment Policy of Namibia (1995)	The Policy seeks to ensure that the environmental consequences of development projects and policies are considered, understood and incorporated into the planning process, and that the term ENVIRONMENT is broadly interpreted to include biophysical, social, economic, cultural, historical and political components.	This EA should consider the term "Environment".
The Occupational Safety and Health Act No. 11 of 2007;	<p>Safety risk is a statistical concept representing the potential of an accident occurring, owing to unsafe operation and/or environment. In the working context "SAFETY" is regarded as "free from danger" to the health injury and to properties.</p> <p>Occupational Health is intended at the promotion and maintenance of the highest degree of physical, mental and social wellbeing of workers in all occupations. This is done by ensuring that all work-related hazards are prevented and where they occur, managed.</p>	The operation of the existing Pelican Point Lodge and associated facilities should comply with the guidelines outlined.
Draft Procedures and Guidelines for conducting EIAs and compiling EMPs (2008)	Part 1, Stage 8 of the guidelines states that if a proposal is likely to affect people, certain guidelines should be considered by the proponent in the scoping process.	The EA should incorporate the aspects outlined in the guidelines.

Public Health Act No. 36 of 1919	The Act serves to protect the public from nuisance and states that no person shall cause a nuisance or shall suffer to exist on any land or premises owned or occupied by him or of which he is in charge any nuisance or other condition liable to be injurious or dangerous to health.	The operation of the existing Pelican Point Lodge and associated facilities should adhere to this regulation.
Namibian Vision 2030	Vision 2030 states that the solitude, silence and natural beauty that many areas in Namibia provide are becoming sought after commodities and must be regarded as valuable natural assets.	Care should be taken that the operation of existing Pelican Point Lodge and associated facilities; do not lead to the degradation and destruction of the habitat.
Water Resources Management Act No. 11 of 2013	<p>Section 13(1) deals with the prohibition of pollution of underground and surface water bodies.</p> <p>The Act also provides provision for the control, conservation and use of water for domestic, agricultural, urban and industrial purposes. In addition, the Act clearly gives provision that pertain with license or permit that required abstracting and using water as well as for discharge of effluent.</p>	<p>The pollution of water resources should be avoided at all costs during the operation of the existing Pelican Point Lodge and associated facilities.</p> <p>The facility will use a septic tank drainage system during the operation phase that must be properly design, constructed, maintained and should be far from watercourse to avoid any see page into sea water, or infiltration into soil.</p>

The Ministry of Environment and Tourism (MET) Policy on HIV & AIDS	MEFT has recently developed a policy on HIV and AIDS. In addition, it has also initiated a programme aimed at mainstreaming HIV and gender issues into environmental impact assessments.	The proponent is required to adhere to the guidelines provided to manage the aspects of HIV/AIDS.
Labour Act No. 11 of 2007	This Act aims to regulate labour in general and includes the protection of the health, safety and welfare of employees. The 1997 Regulations relating to the Health and Safety of employees at work sets out the duties of the employer, welfare and facilities at the workplace, safety of machinery, hazardous substances, physical hazards, medical provisions, construction safety and electrical safety.	Given the employment opportunities presented through the operation of a lodge and associated facility, compliance with the law by contractors and sub-contractors is necessary.
Public and Environmental Health Act of 2015	This Act (GG 5740) provides a framework for a structured uniform public and environmental health system in Namibia. It covers notification, prevention and control of diseases and sexually transmitted infections; maternal, ante-natal and neo-natal care; water and food supplies; infant nutrition; waste management; health nuisances; public and environmental health planning and reporting. It repeals the Public Health Act 36 of 1919 (SA GG 979).	The construction and operation of a recreational park and accommodation facility should comply with these legal requirements.
Petroleum Product and Energy Act No, 13 of 1990	This Act provides a framework for handling and distribution of petroleum products which may include purchase, sale, supply, acquisition, possession, disposal, storage or transportation thereof.	Safe handling of the petroleum products such as fuel and lubricants.

Hazardous Substances Ordinance No. 14 of 1974	This ordinance gives provision to control the handling of hazardous substance in all circumstances, such as manufacturing, imports and exporting of these to ensure human and environmental safety.	The proponent should comply with this legislation.
Marine Resource Act, 2000 (Act 27 of 2000)	The act aims to conserve the marine ecosystem and promote sustainable utilisation of marine resources, including fisheries management.	The management of this project must comply with this Act.
Nature Conservation Ordinance No. 4 of 1975	Chapter 6 provides for legislation regarding the protection of indigenous plants.	Indigenous and protected plants must be managed within the legal confines.
Soil Conservation Act 6 of 1969 Ministry of Agriculture, Water and Forestry	The Act advocates for the prevention and combating of soil erosion; the conservation, improvement and manner of use of the soil and vegetation; and the protection of water sources.	Soils should not be polluted or left un-rehabilitated.
National Heritage Act No. 27 of 2004	The Act provides for the protection and conservation of places and objects of heritage significance and the registration of such places and objects. Part V Section 46 of the Act prohibits removal, damage, alteration or excavation of	Any material of cultural, heritage or archaeological importance shall be reported in accordance with this act.

	heritage sites or remains, while Section 48 sets out the procedure for application and granting of permits.	
Labour Act No. 11 of 2007	This Act aims to regulate labour in general and includes the protection of the health, safety and welfare of employees. The 1997 Regulations relating to the health and safety of employees at work sets out the duties of the employer, welfare and facilities at the workplace, safety of machinery, hazardous substances, physical hazards, medical provisions, construction safety and electrical safety.	Follow legal labour requirements such as safety, remuneration etc.
Regional Council Act, 1992 (Act No. 22 of 1992)	The Regional Councils Act legislates the establishment of Regional Councils that are responsible for the planning and coordination of regional policies and development. The main objective of this Act is to initiate, supervise, manage and evaluate development at regional level.	Observe the municipal by laws
Pollution Control and Waste Management Bill	The Bill aims to regulate and prevent the discharge of pollutants to air and water as well as providing for general waste management. The Bill will be licensed is charge into watercourses and emissions into the air.	All activities shall be conducted within the framework of this Bill
The International Convention	The main international convention covering the prevention of pollution of marine environment by ship from operational or accidental causes. MARPOL was developed by the International Maritime Organisation with	Comply with MARPOL I requirements including all the annexures that Namibia is a signatory.

for the prevention of Pollution from Ships (MARPOL)	an objective to reduce the of the oceans and seas that encompass; dumping, oil and air pollution.	
RAMSAR Convention	The convention on wetland is an intergovernmental treaty that provide the for the framework for the conservation and wise use of wetlands and their resources.	The operation of the proposed project should take into consideration the necessary framework relevant to the conservation and wise use of Walvis Bay Lagoon which is a RAMSAR site.
African Convention on the Conservation of Nature and Natural Resources (African Union, 2003)	Article 9 subsection (h) Article IX subsection (h), on Species and Genetic Diversity is particularly noteworthy, stating that signatory states “shall strictly control the international and, as far as possible, accidental introductions, in any area, of species which are not native to that area and endeavor to eradicate those already introduced where the consequences are detrimental to native species or to the environment in general.”	Care should be taken to ensure that the introduction of alien species does not threaten the natural environment and proper management plans should be in place to prevent the introduction of any alien plants into the natural environment.

<p>Word's Best Practises</p>	<p><i>Precautionary Approach Principle</i></p> <p>This principle is worldwide accepted when there is a lack of sufficient knowledge and information about the possible threats to the environment. Hence if the anticipated impacts are greater, then precautionary approach is applied. In this project, there are no eminent uncertainty however in cases when they arise, this approach should be applied.</p> <p><i>Polluter Pays Principle</i></p> <p>This principle ensures that proponents takes responsibility of their actions. Hence in cases of pollution, the proponent bears the full responsibility to clean up the environment.</p>	<p>Major operational activities and maintenance particularly in the sensitive area such as the peninsula can be detrimental to the sea and underground water. Therefore, precaution must be taken to avoid any potential contamination of both the sea and underground water.</p> <p>In the event of any water or soil contamination, the proponent must be responsible to clean up the environment and liaise with all relevant authority in the country such as the Ministry of Fishery and Marine Resources (MFMR) and Ministry of Environment, Forestry and Tourism (MEFT) as well as all stakeholders involve in the management of the marine environment.</p>
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6. ROLES & RESPONSIBILITIES

6.1 Environmental Compliance Officer (ECO)

The Ministry of Environment, Forestry and Tourism (MEFT) is the upholder of environmental protection. The Environmental Compliance Officer shall be an appointed Environmental Officer from the Directorate of Environmental Affairs delegated to enforce compliance as per the provision of the EMA. The ECO may carry out inspection at any given time to impose compliance. Based on his/her work schedule, the ECO shall visit the site at any time for environmental inspection and monitoring.

6.2 The Proponent

Pelican Point Lodge shall hold the all-encompassing responsibility of environmental management by adequately executing the environmental management plan. Furthermore, it shall be a full responsibility of the **proponent** to execute the following activities.

- Appoint an Environmental Manager;
- Ensures that all workers and contractors are acquainted with the Environmental Management Plan (EMP) and induction on safety measures pertaining to the operation of the eco-lodge and associated facility are initiated;
- Ensure a safe and healthy working environment;
- Provide workers with appropriate Personal Protective Clothing (PPE);
- Monitor the employees works with regard to safety;
- Ensure good environment performance and compliance;
- Contract an environmental consultants or specialist to carry out environmental audits.

6.3 Environmental Manager

The Environmental Manager shall represent the proponent and should ensure that the daily operations of the lodge are monitored and employees and contractors are conforming with the EMP. The copy of the EMP shall be available at the lodge at all time and all the employees

must be acquainted with the EMP. The Environmental Manager should initiate the formulation of the environmental policy that is tailor-made for the operation of the lodge.

6.4 Employees and Contractors

All stakeholders, particularly employees and contractors must;

- Comply and adhere to the EMP;
- Ensuring that all employees have personal protective gears at all time when working;
- Report damaged uniforms as well as PPE and request for replacement;
- Adhere to the company rules and policies.

7. DISCIPLINARY ACTION

The EMP is considered as a live and a legally binding document. Therefore, any nonconformity on compliance to the EMP must be handled in considerate disciplinary legal action against the proponent such as;

- Deferment of work;
- Pecuniary consequences.

The punitive deed shall be determined as per the provision of EMA and relevant statutory legal framework. Under Section 27 (4), *Any person who contravenes subsection (3) commits an offence and is on conviction liable to a fine not exceeding N\$500 000 or to imprisonment for a period not exceeding 25 years or to both such fine and such imprisonment”.*

8. THE ENVIRONMENTAL MANAGEMENT PLAN

This EMP outlines how the impact associated with the operation of the Pelican Point Lodge will be mitigated, monitored and managed and where possible ameliorated and environmentally acceptable. The following tables details the management actions recommended to contain the potential negative impacts associated with the operation of the existing; Pelican Point Lodge. These management actions have been organised temporally according to the proposed operation of the lodge and includes the Social, Environmental, Occupational Health and Safety related aspects.

SECTION A: STAFF INDUCTION

Table 3: Staff Induction Mitigation Measures

Environmental or Social Aspects	Objective	Proposed Mitigation Measures	Monitoring Indicators	Responsibility
Staff Induction	To ensure that all employees are conversant with the requirements of the EMP including environmental policy and procedures.	<p>All employees and contractors must go through a thorough induction course on all the provisions of the EMP including environmental policy and procedures.</p> <ul style="list-style-type: none"> • There must be an annual induction course for all the workers. • New employees must not start work without under-going through an induction course which covers; environmental and health and safety issues. 	<p>Induction minutes and attendance register signed by each staff member.</p> <p>Induction report</p>	Environmental Manager and/or proponent representative

Environmental or Social Aspects	Objective	Proposed Mitigation Measures	Monitoring Indicators	Responsibility
	Disciplinary	<ul style="list-style-type: none"> The proponent must adopt a disciplinary system to discipline staff for non-conformity, this may include aspects such as not wearing PPE while working etc. Stringent measures must be put in place for any employee found contravening provisions of the EMP, must be granted a warning letter. 	<p>Disciplinary meetings and actions</p> <p>Disciplinary letters / Warnings</p>	Environmental Manager and/or proponent representative
	Availability of the EMP and Environmental Policy Statement at the site for ease of reference.	<ul style="list-style-type: none"> Ensure that a copy of the EMP and Environmental Policy Statement are kept at the lodge at all time and it should be readily accessible. 	Empirical view of the EMP and Environmental Policy Statement.	Environmental Manager and/or proponent representative

Environmental or Social Aspects	Objective	Proposed Mitigation Measures	Monitoring Indicators	Responsibility
Communication	To ensure effective communication and improve environmental management and awareness.	<ul style="list-style-type: none"> • The proponent must develop a communication strategy. • Correspondences must be in writing. • The contact numbers for the Environmental Manager must be available, displayed at key areas at the lodge in case of emergencies. • There must be an assembly point for emergency communication. • All employees who are in a position to make or take actions that will influence the conservation and management of the environment must be vested with a good knowledge 	<p>Communication Strategy</p> <p>Letters, e-mail, notices, minutes</p> <p>Display of the Environmental Manager and emergency numbers at key areas of the lodge.</p>	Environmental Manager and/or proponent representative

Environmental or Social Aspects	Objective	Proposed Mitigation Measures	Monitoring Indicators	Responsibility
		of their respective responsibilities in order to ensure accurate implementation of the EMP, Environmental Policy Statement and Environmental Management System.		

SECTION B: HEALTH AND SAFETY

Table 4: Health and Safety Measures to be implemented

Environmental / Social Aspects	Objective	Operation Phases Mitigation Measures	Monitoring Indicators	Management Indicators	Responsibility
Health & Safety	Adhere to the Health and Safety Regulations, Government Notice 156/1997 (GG 1617).	<ul style="list-style-type: none"> The proponent must develop a health and safety plan; A compulsory safety induction course 	Health and safety included and reflected in the induction minutes	Approved certification of completion.	Environmental Manager and/or proponent representative

Environmental / Social Aspects	Objective	Operation Phases Mitigation Measures	Monitoring Indicators	Management Indicators	Responsibility
		<p>must be given to all employees.</p> <ul style="list-style-type: none"> Each employee must be provided with personal protective equipment (PPE) as well as uniform and must be worn at all time during working hours. Ensure all employees are inducted on the dangers of the risks associated with working at the lodge and the available emergency response; 	<p>Visual Inspection</p> <p>Visual Signs available</p>	<p>Visual Inspection</p> <p>Availability of fire extinguishers on the wall of the lodge, quest rooms and other facility. Evidence of training attended must be displayed and copies filed. The minutes,</p>	

Environmental / Social Aspects	Objective	Operation Phases Mitigation Measures	Monitoring Indicators	Management Indicators	Responsibility
		<ul style="list-style-type: none"> There must be clear health and safety signs at designated area such as, ASSEMBLY AREA, NO SMOKING “DANGER”, “ENTRANCE PROHIBITED” etc. Employees must NOT be exposed to noise levels above the required -85dB (A) limit over a period of 8 hours. Should the noise level be higher than 85dB, the proponent must implement a hearing 	<p>Record of hearing loss</p> <p>No noise signs at the quest rooms areas.</p>	<p>training pictures etc should also be displayed and visible signages should be erected at the facility.</p> <p>Report of health check-ups.</p>	

Environmental / Social Aspects	Objective	Operation Phases Mitigation Measures	Monitoring Indicators	Management Indicators	Responsibility
		<p>conservation program such as noise monitoring;</p> <ul style="list-style-type: none"> • Supply safe drinking water. • Ensure adequate, hygienic and user-friendly ablution facilities for all the guests at the lodge as well as employees and visitors; • Inspect ablution facilities at the lodge regularly. • Biodegradable toilet cleaners are used to 	<p>Clean water</p> <p>Clean toilets at all time</p> <p>Proof of Certification</p>	<p>Laboratory analysis report</p> <p>Clean toilets at all time</p>	

Environmental / Social Aspects	Objective	Operation Phases Mitigation Measures	Monitoring Indicators	Management Indicators	Responsibility
		<p>preserve bacteria in the septic system.</p> <ul style="list-style-type: none"> The supervisors at the lodge must undertake an occupational health and first aid course. 			
Open fires	To prevent fire	<ul style="list-style-type: none"> No open fires may be made anywhere at the lodge without management knowledge and full supervision. Fire-fighting equipment must be made available, regularly maintained and employees must 	<p>Visual Inspection</p> <p>Service records</p>	<p>Visual Inspection</p> <p>Service reports</p>	<p>Environmental Manager and/or proponent representative</p>

Environmental / Social Aspects	Objective	Operation Phases Mitigation Measures	Monitoring Indicators	Management Indicators	Responsibility
		<p>be trained in fire safety.</p> <ul style="list-style-type: none"> • Fire extinguishers must be placed strategically around the lodge and must be easily accessible. 			
Energy use	To reduce excessive use of fossil fuel	<ul style="list-style-type: none"> • Energy use for instances; electricity, diesel and gas should be metered and monitored. • Solar system to provide most of the energy for the facility. • All cooking must be done with gas. 	Energy audit report	Energy audit report	Environmental Manager and/or proponent representative

Environmental / Social Aspects	Objective	Operation Phases Mitigation Measures	Monitoring Indicators	Management Indicators	Responsibility
		<ul style="list-style-type: none"> • All electrical appliance that is being used at the lodge must be energy efficient models. • Generator should be used as a back-up only. • Generator must be housed in a noise tight building structure. • All employees and guests must be sensitised about the energy conservation. 			

Environmental / Social Aspects	Objective	Operation Phases Mitigation Measures	Monitoring Indicators	Management Indicators	Responsibility
Road safety		<ul style="list-style-type: none"> Only permitted access road road/track leading to the peninsula must be used and no off-road driving is allowed. All vehicles that transport supplies and guests to and from the lodge must be roadworthy. Drivers that transport supplies and guests to the lodge should have a valid driver's license and should adhere to all traffic rules. 	Road signs	Road signs	Environmental Manager and/or proponent representative

Environmental / Social Aspects	Objective	Operation Phases Mitigation Measures	Monitoring Indicators	Management Indicators	Responsibility
		<ul style="list-style-type: none"> • Loads upon vehicles must be properly secured to avoid items falling off the vehicle. • The road leading to the lodge should have proper signages that are corrosive resistant and made out of material and in the colours that contribute to the sense of the place. • Parking bays at the lodge must be properly demarcated. 			

Environmental / Social Aspects	Objective	Operation Phases Mitigation Measures	Monitoring Indicators	Management Indicators	Responsibility
		<ul style="list-style-type: none"> Pipes and cables are buried or otherwise not visible by the quests and visitors. 			
Establish and Maintain an Occupational health and Safety Management System (SMS)	Improved occupational health and safety at work place	<ul style="list-style-type: none"> Maintain high safety standards at the lodge and arrange annual audits by credible institutions. 	Accident records	High standards of occupational health and safety ratings is maintained.	Environmental Manager and/or proponent representative

SECTION C: POLLUTION CONTROL AND WASTE MANAGEMENT

Table 5: Pollution and Waste Management Mitigation Measures

Environmental / Social Aspect	Objectives	Operation Phase Mitigation Measures	Monitoring Indicator	Management Indicator	Responsibility
Vehicle Emissions	Reduce greenhouse gas (GHG) emissions from vehicles / machinery	<ul style="list-style-type: none"> All equipment and vehicles must be kept in good working condition and serviced frequently to prevent emission of noxious smoke etc. Switch off engines when vehicles are at the lodge. 	Vehicle service records books Reports of smoke emissions from machinery	Endorsement by the management	Environmental Manager and/or proponent representative

Environmental / Social Aspect	Objectives	Operation Phase Mitigation Measures	Monitoring Indicator	Management Indicator	Responsibility
Surface and ground water contamination / pollution	To prevent soil and water pollution	<ul style="list-style-type: none"> Contaminated runoff from the various operational activities at the lodge must be prevented at all cost from entering any surface water bodies. 	<p>Service records</p> <p>Visible drip trays</p> <p>Proper storage with concrete bund surface of septic tanks.</p>		Environmental Manager and/or proponent representative
Oil Spillages	To prevent oil spill from minor servicing of	<ul style="list-style-type: none"> No oils, lubricants and hydrocarbons are allowed to be kept at the facility at all. 	Place warning signs	Site inspection and record keeping	Environmental Manager and/or proponent representative

Environmental / Social Aspect	Objectives	Operation Phase Mitigation Measures	Monitoring Indicator	Management Indicator	Responsibility
	equipment and machineries.	<ul style="list-style-type: none"> To prevent any potential spillage no servicing must take place at the lodge at all. No refuelling of vehicles is permitted at the site, and must only take place at the existing filling stations in Walvis Bay townland. 			
Oil leakage	To prevent fuel leakages during construction and operation of the facility.	<ul style="list-style-type: none"> All stationary vehicles and machinery must have drip trays to collect leakages of oils and lubricant. Vehicle and machinery to be used during 	Visible monitoring		Environmental Manager and/or proponent representative

Environmental / Social Aspect	Objectives	Operation Phase Mitigation Measures	Monitoring Indicator	Management Indicator	Responsibility
		<p>operation of the lodge must be in good condition and well serviced to avoid leakages of oils and lubricants;</p> <ul style="list-style-type: none"> Although not anticipated to be significant, oil drops for instance of less than 500ml, if it happens to contaminate the soils must be collected and be treated with bioremediation. 			

Environmental / Social Aspect	Objectives	Operation Phase Mitigation Measures	Monitoring Indicator	Management Indicator	Responsibility
Waste generation	To prevent littering	<ul style="list-style-type: none"> The lodge shall be kept clean and free of litter at all time and waste must be kept in appropriate receptacles. All personnel shall be instructed to dispose of all waste in a proper manner. The lodge must have adequate wheelie bins that are labelled to dispose waste fractions. The wheelie bins must always be kept in a waste 	<p>Waste bins and skip containers</p> <p>Waste management plan</p>	<p>Waste bins and skip containers</p> <p>Waste management plan</p>	Environmental Manager and/or proponent representative

Environmental / Social Aspect	Objectives	Operation Phase Mitigation Measures	Monitoring Indicator	Management Indicator	Responsibility
		<p>room at the lodge with control access.</p> <ul style="list-style-type: none"> • The waste room must have a scavenger-proof door and kept closed all the time to prevent scavenger including birds from entering the facility. 			

Environmental / Social Aspect	Objectives	Operation Phase Mitigation Measures	Monitoring Indicator	Management Indicator	Responsibility
		<ul style="list-style-type: none"> • The proponent shall identify and separate materials that can be reused or recycled to minimise waste e.g. metals, packaging and plastics, and provide separate marked bins for these items. • No dumping of waste products of any kind is permitted. 			

Environmental / Social Aspect	Objectives	Operation Phase Mitigation Measures	Monitoring Indicator	Management Indicator	Responsibility
		<ul style="list-style-type: none"> • Fat and grease traps must be installed at kitchen outlets and kept in a correct receptacle and taken at appropriate facility in Walvis Bay for treatment. • Discourage the use of fat and grease products at the lodge. • No waste may be burned on site. 			

Environmental / Social Aspect	Objectives	Operation Phase Mitigation Measures	Monitoring Indicator	Management Indicator	Responsibility
		<ul style="list-style-type: none"> • General waste is to be collected either by the local Municipality or removed by the proponent or by the contractor. • The frequency of collections will be such that waste containment receptacles do not unduly accumulate at the site or overflow. • All waste from the lodge must be securely transported to Walvis Bay landfill for disposal. 			

Environmental / Social Aspect	Objectives	Operation Phase Mitigation Measures	Monitoring Indicator	Management Indicator	Responsibility
		<ul style="list-style-type: none"> Ensure that Namibian National Solid Waste Management Strategy of 2017 is in place and enforce. 			
Sewerage system	To prevent unpleasant odour and leakages.	<ul style="list-style-type: none"> Regular maintenance of sewerage system as per the company policies as well as procedures. If leakage or unpleasant odour has been identified, the leaking materials or source of odour must be remediated within a day. 	Maintenance schedules.	Maintenance records and report.	Environmental Manager and/or proponent representative

Environmental / Social Aspect	Objectives	Operation Phase Mitigation Measures	Monitoring Indicator	Management Indicator	Responsibility
		<ul style="list-style-type: none"> The lodge must have a service level agreement with a reputable local plumbing company to attend to all plumbing problem and to be always on stand-by when there is an emergency. Apply for the sewerage permit at MAWLR. 	Endorsed service level agreement.	Endorsed service level agreement.	
Dust	To reduce dust impact	<ul style="list-style-type: none"> The lodge must install dust proof windows and doors. Clean the windows of the facility regularly. 	Dust proof windows and doors	Dust proof windows and doors	Environmental Manager and/or proponent representative

Environmental / Social Aspect	Objectives	Operation Phase Mitigation Measures	Monitoring Indicator	Management Indicator	Responsibility
		<ul style="list-style-type: none"> • Wipe dust off the windows regularly. • Install dust screens • Use a purifier at the facility. • During high wind conditions the project manager must make that all the guests rooms windows and doors are closed. • Dust protection masks should be provided to workers and guests if they complain about dust. 	Dust monitoring	Dust monitoring	

SECTION D: ENVIRONMENT

Table 6: Environmental Mitigation Measures to be implemented

Aspect	Objective	Operation Phase Mitigation Measures	Monitoring Indicator	Responsibility
Biodiversity	Maintain the biodiversity of the area.	<ul style="list-style-type: none"> Guest and employees should be made aware that they are in a sensitive environment and be taught how to interact with marine biological resources such as the avian fauna and other species found in the area. No fishing is permitted in the area without a valid permit. No workers should be permitted to disturb, remove or collect any fauna or flora or its materials. Pick, uproot, or damage any fauna or flora materials in the area without the necessary permit. Prevent the destruction of protected fauna and flora species in the area. 	<p>Disciplinary records</p> <p>Biodiversity management plan</p>	Environmental Manager and/or proponent representative

Aspect	Objective	Operation Phase Mitigation Measures	Monitoring Indicator	Responsibility
		<ul style="list-style-type: none"> Disciplinary actions must be taken to any person not complying and strict penalties shall be imposed. Employees and contractors must be educated and made aware in writing of the consequence of transgression and any breach of this should be treated as criminal offence. 		
Poaching of any fauna and flora	To prevent poaching and illegal harvesting of fauna and flora including avian-fauna and their genetic resources.	<ul style="list-style-type: none"> No worker and contractors are permitted to collect fauna and flora materials, etc. during the operational phase of the lodge, neither to harvest any biological materials. Any illegal harvesting or poaching of fauna or flora materials should be report to the relevant authorities such as MFMR, MEFT and Namibian Police. 	Disciplinary records	Environmental Manager and/or proponent representative
Water resource	Conservation of water resource	<ul style="list-style-type: none"> No pollution or contaminant should be allowed to enter the water. 		Prop Environmental Manager and/or

Aspect	Objective	Operation Phase Mitigation Measures	Monitoring Indicator	Responsibility
		<ul style="list-style-type: none"> • Apply for the water abstraction permit at Ministry of Agriculture, Water and Land Reform (MAWLR) for any borehole and operation of a small desalination plant at the lodge. • Recycle water and promote the re-use of water. • Monitor and control water usage and minimise if possible. • Keep record of water consumption, set target and put action plan when targets are exceeded. 	Valid water abstraction permit.	proponent representative
Soil erosion		<ul style="list-style-type: none"> • Appropriate erosion control structures must be put in place where soil may be prone to erosion. • Checks must be carried out at regular intervals to identify areas within the facility where erosion is occurring. Appropriate 		

Aspect	Objective	Operation Phase Mitigation Measures	Monitoring Indicator	Responsibility
		remedial actions are to be undertaken wherever erosion is evident.		
Alien invasive	Maintain natural ecosystem	<ul style="list-style-type: none"> No alien invasive plant species may be permitted to be planted at the lodge. No pets are allowed to stay on the lodge. 	Alien invasive species record.	Environmental Manager and/or proponent representative

SECTION E: HERITAGE AND ARCHEOLOGICAL RESOURCES

Table 7: Archaeology and Heritage Mitigation Measures

Environment / Social Aspect	Objectives	Construction and Operation Phase Mitigation Measure	Monitoring Indicator	Responsibility
Heritage Resources / Artefacts	Preserve Heritage and Archaeological materials	<ul style="list-style-type: none"> The management should be made aware of the provision of the National Heritage Act regarding prompt reporting of any archaeological findings. 	Sighting report/s of heritage resources / artefacts	Environmental Manager and/or proponent representative

Environment / Social Aspect	Objectives	Construction and Operation Phase Mitigation Measure	Monitoring Indicator	Responsibility
		<ul style="list-style-type: none"> • Immediately inform the Environmental Manager or management, who will inform the NHC. • Retain all the artefacts recovered and where feasible; maintain a photographic record, take note of the date, time, location and type of artefacts found in the logbook; • Contract an archaeologist in consultation with NHC to survey the area. • Avoid construction within 500m from the centre once of the area that has been surveyed in order to obtain the baseline data, a 2-3 baseline data is recommended. 		

SECTION F: SOCIO ECONOMIC

Table 8: Social Economic Mitigation Measures

Environmental / Social Aspects	Objectives	Construction and Operation Phase Mitigation Measures	Monitoring Indicator	Responsibility
Employment	Promote benefits to the local resident	<ul style="list-style-type: none"> • Adopt a local first policy to ensure that all general work is reserved for local people from Walvis Bay or within the Erongo region, unless in circumstances where specialised skills are required. • Ensure that wellness program includes all the employees. • Employ local contractors e.g. SMEs from Walvis Bay. • Where possible expand wellness programs to contracted SMEs. 	Employee structure and proportion of local employment	Environmental Manager and/or proponent representative

Environmental / Social Aspects	Objectives	Construction and Operation Phase Mitigation Measures	Monitoring Indicator	Responsibility
		<ul style="list-style-type: none"> Fair compensation and labour practise as per Namibian Labour Laws must be followed. 		
Corporate Social Responsibility	Enhance the livelihood of the local communities	<ul style="list-style-type: none"> With the resources available support appropriate initiatives to improve the community welfare particularly in Kuisebmund and other less privilege neighbourhoods. 	Undertaking corporate social responsibility activities.	Environmental Manager and/or proponent representative
HIV/AIDS	To prevent the spread of HIV/AIDS	<ul style="list-style-type: none"> Provide HIV/AIDS awareness at induction. 	HIV/AIDS awareness campaigns.	Environmental Manager and/or proponent representative
Alcohol and Drug use	Prevent alcohol and drug use	<ul style="list-style-type: none"> Ban the use of drugs onsite. Employees must not consume alcohol when on-duty. Teach employees about dangers alcohol and substance abuse. 	Drunk / Misbehaving employees Breathalyser report	Environmental Manager and/or proponent representative

Environmental / Social Aspects	Objectives	Construction and Operation Phase Mitigation Measures	Monitoring Indicator	Responsibility
		<ul style="list-style-type: none"> Employees must be screen with the breathalyser when suspected to be intoxicated personnel to entering the facility. 		
Working hours	Adhere to the Labour Act No. 11 of 2007	<ul style="list-style-type: none"> Operate within the prescribed working days and hours as per the Namibian Labour laws and regulations 	Labour unrest / Demonstration	Environmental Manager and/or proponent representative

SECTION G: DECOMISSIONING/CLOSURE

Table 9: Decommissioning/closure Mitigation Measures to be implemented

Aspect	Objective	Construction and Operation Phase Mitigation Measure	Monitoring Indicator	Responsibility
Closure Plan	To ensure and attain the decommission/closure targets.	<ul style="list-style-type: none"> Ensure closure plan is continuous throughout the life cycle of the project. 	Updated decommissioning/closure plan.	Environmental Manager and/or proponent representative

Aspect	Objective	Construction and Operation Phase Mitigation Measure	Monitoring Indicator	Responsibility
		<ul style="list-style-type: none"> When there are any renovation taking place post renovation the rubbers or remnants should be stockpiled in a demarcated area and securely transported to the appropriate municipal landfill in Walvis Bay. Collect all relevant information throughout the life cycle of the project to ensure that all environmental risks are quantified and managed properly. Submit the closure plan to the office of the Environmental Commissioner for approval. 		
Financial provision for the decommissioning/closure of the facility and rehabilitation.	Enhance decommissioning/closure and rehabilitation	<ul style="list-style-type: none"> Allocate substantial operational cost in order to attain the EMP objectives by ensuring that potential impacts are managed or monitored. Maintain sufficient Protection and Indemnity (P&I) Insurance Cover for the purpose of closure and rehabilitation liabilities. 	Protection and Indemnity (P&I) Insurance Cover.	Environmental Manager and/or proponent representative

Aspect	Objective	Construction and Operation Phase Mitigation Measure	Monitoring Indicator	Responsibility
		<ul style="list-style-type: none"> Reserve sufficient funds for specialist assessments in the event that the closure of the Lodge and its associated facility will be taking place and resources for continuous monitoring. 		

9. CONCLUSION AND RECOMMENDATIONS

The Pelican Point Lodge is situated in an environmental sensitive area and its operation requires constant monitoring as well as the need for the implementation of the environmental audit on quarterly basis. Most of the negative impacts associated with the operation of the lodge can be reduced to negligible, if the mitigation measures detailed in this EMP are properly implemented. All potential impacts were identified, and mitigation measures proposed were provided with high confidence. Due to the uniqueness of the area, the lodge management are encouraged to apply for the eco-award certification.

It's highly unlikely for the operation of the lodge to cease unless the property will be sold and transferred to the new owner. In the event that the property will be sold and transferred to the new owners, all the relevant authority must be informed and a change of ownership plan must be prepared and shared with the relevant authorities including the municipality and the residents of Walvis Bay. It is recommended that the Environmental Clearance Certificate (ECC) shall be issued to necessitate the operation of the Pelican Point Lodge. The lodge must immediately implement regular monitoring as well as environmental auditing and biannual environmental reports that must be submitted to the Office of the Environmental Commissioner at MEFT.