

**ENVIRONMENTAL
MANAGEMENT PLAN (EMP)
FOR THE OPERATION AND
MANAGEMENT OF THE
ADVENTURE CAMP LODGE AT
DZOTI IN THE ZAMBEZI REGION**

18 March 2025

*Prepared by
SM Dynamic Environmental Consultants.*

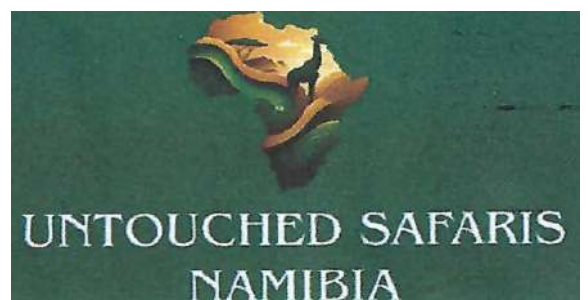




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PURPOSE OF THIS DOCUMENT

This Environmental Management Plan (EMP) has been prepared to outline how the proposed Adventure Camp Lodge development will manage its environmental impacts, ensuring they are minimised and that they are environmentally acceptable. It further provides details on the mitigation measures, monitoring protocols, and institutional requirements to protect the environment during all stages of the project, from design and construction to operation.

The intended Adventure Camp Lodge will be constructed at Kasungwe, Malengalenga, within the Dzoti Conservancy area, in the Zambezi Region. Malengalenga is situated in the Linyanti Constituency. The Malengalenga community, like many rural areas, faces socio-economic challenges including high poverty rates, reliance on subsistence agriculture, and limited access to resources and opportunities.

Where to find this EMP:

Electronic copies are available on request at the following address:

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MEFT's EIA Portal

LIST OF ACRONYMS

DEA	Department of Environment Affairs
EA	Environmental Assessment
EAP	Environmental Assessment Practitioner
EC	Environmental Commissioner
ECC	Environmental Clearance Certificate
EIA	Environmental Impact Assessment
EMA	Environmental Management Act
EMP	Environmental Management Plan
ZRC	Zambezi Regional Council
MEFT	Ministry of Environment, Forestry Tourism
NTB	Namibia Tourism Board
MTA	Mayeyi Traditional Authority
USN	Untouched Safaris Namibia

1. INTRODUCTION AND SCOPE

Established in October 2009, Dzoti Conservancy spans approximately 287 km² and supports approximately 2,286 residents. Hunting is crucial for income, especially where tourism is limited, and it finances salaries for conservancy staff and community projects. Between 2011 and 2018, hunting revenues were essential for covering operational costs exceeding N\$ 5.8 million and funded community initiatives, including compensation for human-wildlife conflicts and social projects. This initiative not only aims to improve economic conditions but also emphasises conservation and community resilience through sustainable practices.

The Linyanti constituency, particularly the Dzoti Community in Malengalenga, offers significant potential for tourism development due to its rich biodiversity and presence of iconic wildlife species, including the "big five." This potential can translate into job creation and income opportunities for the local population.

The primary aim of this EMP is the sustainable utilisation of a natural asset with an emphasis on biodiversity management and diverse tourism opportunities in the Dzoti Conservancy Area.

The EMP specifically aims for the following:

1. Comply with the requirements of the National Conservation Act, 2017 (Act 3 of 2017)
2. Review the current land use practice by identifying and mitigating the impacts of clients on biodiversity and heritage resources within the Park
3. Develop guidelines and an associated code of conduct for clients
4. Develop a coordinated approach to implement, monitor and enforce this EMP.
5. Identify the roles and responsibilities of operators and other stakeholders in the implementation and enforcement of the EMP

6. Sustain and strengthen a constructive partnership between operators and Park Management.
7. Manage future growth and diversity of the Dzoti Community in the Park.

This Environmental Management Plan serves as a management tool for the operation and management of the Adventure Camp Lodge at Kasungwe area in the Malengalenga jurisdiction. The main objective of this EMP is to assist in outlining measures to be implemented to minimise adverse environmental degradation associated with the planned development.

The proposed site is well-suited for development due to its location within an already disturbed area, primarily affected by vehicle traffic from conservancy officials and park authorities. This prior disturbance minimises the potential for significant negative environmental impacts. The site selection is informed by the unique characteristics of the marshes, which showcase the complex interactions among various environmental factors. Notably, recurrent flooding plays a critical role in shaping the park's ecology, supporting Namibia's largest seasonally inundated grasslands and a diverse array of wildlife and bird species.

The development of the adventure camps lodge at Kasungwe in the Zambezi Region aims to integrate natural colours and materials into its construction and landscaping to minimise visual impact and harmonise with the environment. Key activities outlined for the construction and operation include:

1. **Minimal Vegetation Clearing:** Efforts will be made to limit the clearing of vegetation, preserving the natural landscape.
2. **No Levelling of the Site:** The site is already flat, so no additional levelling will be necessary, further reducing disruption.
3. **No Barrow Pits:** There will be no digging of barrow pits, which helps maintain the integrity of the surrounding environment.

4. **Water Borehole:** A borehole will be drilled to source water for construction and campsite use, ensuring that water needs are sustainably met.
5. **Dust Control Measures:** The main access route will be updated and regularly watered to control dust during construction activities.

The Dzoti Community, through the Silonga & Nkiye Sub-Khuta of the Mayeyi Traditional Authority, has commissioned an Environmental Study to comply with the Environmental Management Act (EMA) (Act No. 7 of 2007). This initiative is supported by Untouched Safaris Namibia, which emphasizes sustainable tourism and community upliftment.

SM Dynamic has been tasked with conducting the Environmental Scoping Study and facilitating the Environmental Impact Assessment (EIA) process necessary for obtaining the Environmental Clearance Certificate. The study aims to adopt innovative approaches to natural resource management and ensure compliance with relevant legislation. The Namibian Constitution, particularly Articles 91(c) and 95, provides a framework for the sustainable use of natural resources for the benefit of all Namibians, both present and future.

The proposed campsite development once approved, will be developed at Kasungwe in the Malengalenga area, encompassing approximately 17,000 m² (1.7 hectares) (Latitude: S 18.33016, Longitude: E 023.73240). This location presents an opportunity to balance development with ecological preservation in the Linyanti constituency.

Operating an adventure camp lodge in a conservancy area forms part of the listed activities under Government Notice No. 30 of the Environmental Impact Assessment regulations of the Environmental Management Act No.7 of 2007 (EMA). Listed activities refer to a list of activities that may not be undertaken without an Environmental Clearance Certification.

The key objective of the Environmental Management Act (EMA) is to prevent and mitigate impacts, based on the principles outlined in Section:

- Ensuring that the significant effects of activities on the environment are considered in time and carefully.
- Ensuring that there are opportunities for timeous participation of interested and affected parties throughout the assessment process; and,
- Ensuring that the findings of an assessment are considered before any decision is made in respect of activities.

The Environmental Management Plan (EMP) is the tool that can assure that the project proponent has made suitable provisions for mitigation. This Environmental Management Plan (EMP) describes the methods and procedures for mitigation and monitoring impacts. This section will contain environmental objectives and targets the project proponent needs to achieve to reduce or eliminate negative impacts. The EMP document can be used throughout the project life. It should be regularly updated to remain aligned with the project as it progresses throughout its operational phase, expansion and decommissioning.

2. OBJECTIVES

- To mitigate adverse impacts on various environmental aspects that have been identified during the assessment phase.
- Enhance the value of the environmental aspects where possible.
- To protect environmental resources where possible.

3. LEGAL REQUIREMENTS

Table 1: Legal Framework

LEGISLATION	PROVISION AND REQUIREMENTS
Article 95 of the Namibian Constitution	Provide overarching guidance in terms of the maintenance and sustainable use of natural resources for the benefit of all Namibians, both present and future.
Environmental Management Act No.7 of 2007	Ensures that the significant effects of activities on the environment are considered carefully and timeously. It promotes the sustainable management of the environment and the use of natural resources by establishing principles for decision making on matters relating to the built environment.
Nature Conservation Amendment Act, 2017 (Act 3 of 2017)	To provide for a proper administrative, legal and procedural framework for tourism concessions in protected areas and other State land.
National Heritage Act No. 27 of 2004	Provide for the protection and conservation of places and objects of heritage significance and registration of such places and objects.
Public Health and Environmental Act, 2015	<p>The objective of this Act is to:</p> <ul style="list-style-type: none"> Prevent injuries, diseases, and disabilities Promote individuals and community from public health risks Provide for early detection of diseases and public health risks Promote public health and wellbeing

4. BACKGROUND ON DZOTI COMMUNITY

The Dzoti Community, in collaboration with the Mayeyi Traditional Authority, is spearheading an exciting development project to establish a self-catering campsite. Untouched Safaris Namibia is supporting this initiative by providing sponsorship for the construction and training of the Dzoti Community in managing and operating the campsite once it is complete. As a tour and safari operator, Untouched Safaris aims to enhance the tourism experience for its high-end clients through this joint venture, combining cultural engagement with sustainable tourism practices. This partnership fosters community empowerment and promotes the preservation of the region's unique heritage and natural beauty.



Figure 1: Study Area

The proposed area will be constructed on an area measuring approximately 1,5 hectare on State land, under the jurisdiction of the Mayeyi Traditional Authority. The project is envisaged to commence this year pending approval for the ECC. Therefore, this EMP only focuses on the lodge's operational activities. The following activities form part of the existing establishment:

- Guest suite (8-12 units)
- Main building/reception
- Staff village
- Borehole
- Laundry and storage unit
- Solar System

SM Dynamic Environmental Consultants have been appointed to facilitate the application for an Environmental Clearance Certificate (ECC), which is required to continue operating this business in the National Park.



Figure 2: Artist Design for Guest Suite

Table 2: Site Coordinates

Proposed Site location		
#	Longitude	Latitude
A	18.33016	-23.73240
B	18.42454	-23.72984
C	18.42318	-23.73496
D	18.42939	-23.72293

5. LIMITATIONS AND ASSUMPTIONS

This Environmental Management Plan (EMP) does not include measures for compliance with statutory health and safety requirements, as health and safety are considered out of the scope of this EMP. Should any conflict arise between sections of this EMP or other legal requirements, the contract and legal framework must be adopted.

6. ENVIRONMENTAL MANAGEMENT PLAN

An Environmental Management Plan is a guidance document to measure and achieve compliance with a planned project's environmental protection and mitigation requirements, as per Environmental Management Act No. 7 of 2007. This EMP document was prepared for the Environmental Clearance Permit application stage for the Dzoti Adventure Camp lodge development. The client has agreed to follow management strategies to avoid and mitigate environmental impacts during project work. SM Dynamic has completed several of these management plans, taking into consideration specific clients' requirements and best

environmental management practices for a diverse range of projects, such as tourism development and property development.

7. RESPONSIBILITIES FOR ENVIRONMENTAL MANAGEMENT

All personnel, including contractors, will be made aware of how the lodge development is to be constructed, operated and managed to ensure compliance with this EMP. Below is a summary of the authority and environmental responsibilities of key personnel at the Dzoti Adventure Camp Lodge.

Camp Manager

- Carefully manage the handling of all hydrocarbons and other hazardous materials.
- Implement the waste management plan.
- Conduct regular inspections of compliance management of this EMP and other related permit requirements.
- Allocate project resources to handle environmental issues.
- Ensure compliance with park rules and regulations.
- Monitor and maintain all equipment and machinery.
- Ensure that staff are controlled through the implementation of security measures.
- Monitor excessive dust and noise levels and implement control measures.
- Maintain a complaint register and report incidents to the Park Authorities.

8. TRAINING AND AWARENESS

Ensure all site employees (and contractors, where required) receive suitable environmental training to ensure they are aware of their responsibilities and competent to carry out their work.

Environmental requirements are explained to employees as part of their inductions and refresher training. In addition, during site inductions and on an ongoing basis, training will be provided in meetings and the like. All inductions and ongoing training shall be recorded.

9. ENVIRONMENTAL MONITORING

Regular environmental inspections will be undertaken by the Site Manager to ensure that the environmental controls are been implemented, meet the required specifications, and are maintained accordingly. Compliance reporting is required to produce systematic, comprehensive, and informative reports on the environmental performance due to the operational activities of the campsite development.

Detailed sampling analytical methods should be well-defined in relevant procedures and work instructions. The implementation of the monitoring requirements is the responsibility of the Site Manager.

10. INCIDENT & EMERGENCY

The main objective of this EMP is to identify potential risks and develop and maintain mitigation measures to manage them. The approach to be adopted involves the following: risk analysis, prevention, preparedness, response, and recovery.

Incident notification will depend on the extent of the event and the incident classification and is to take place per the company's incident reporting procedure. Corrective action will be implemented to prevent the recurrence of incidents.

11. EMERGENCY CONTACTS

The following are the internal emergency contacts for the adventure centre, which include regulatory authorities, the local community, and emergency services.

Table 3: Emergency Contacts

Position	Phone Number	Mobile number
Camp Manager	To be appointed	To be appointed
MEFT	066 253027	081 129 7178
Police (Sangwali Police Station)	066 261300	
Traditional Authority	To be appointed	To be appointed

12. COMPLAINTS HANDLING

Close liaison will be maintained between the Camp Manager and visitors to provide effective feedback regarding operations at the lodge. In this manner, operations can be coordinated where necessary to minimise disturbance to park users and ensure prompt response to complaints, should they occur. The site manager shall record all complaints or reports received externally. These records will be kept for at least four years after the complaint is made.

13. COMMUNICATION AND CONSULTATION

The Adventure Camp Lodge is committed to meaningful stakeholder engagement and continues to work in collaboration with other stakeholders and the local community to resolve issues that impact the local environment. Relevant stakeholders will be kept informed of the centre's future development proactively and responsively through meetings, local newspapers, leaflets, and community notice boards.

14. ACCESS CONTROL AND INFORMATION BOARDS

The sign displays signage to advise visitors of operational times, park rules, and contact numbers will be placed at the main entrance. Additional signage includes:

- Directional parking area.
- Restrictions and operational times.
- Signage for safety, work health, and safety requirements.

15. WASTE MANAGEMENT

The Adventure Camp Lodge facility will be responsible for refuse collection and storage facilities, including recycling of waste. Scheduled weekly refuse removals must be set, and designated employees must ensure the daily litter picking and cleaning of the premises and surrounding areas.

Uncontrolled handling of fuel and other chemicals poses a threat to the environment and may result in soil, groundwater, and surface water contamination. Proper storage of these fuels and chemicals must be planned carefully to avoid spillages. The team should implement spill prevention measures immediately, and spill kits must always be available. Spill kits must contain the following items: absorbent material, sawdust, shovels, heavy-duty plastic bags, and protective clothing (overalls and gloves). It is recommended that all major spills to be recorded and reported to the park authorities.

16. ENVIRONMENTAL ACTIVITY

The management measures proposed to mitigate potential impacts upon operating this business are as follows:

Action Plan 1: Management of hydrocarbon and related spills.

The objective is to handle and store hydrocarbons in such a manner as to prevent spills. In case of a spillage, the spill must be contained and the contamination cleaned up and disposed of accordingly.

Table 4: Hydrocarbon and related spills

Activity	Management and mitigation strategy	Action Plan	
		Frequency/targeted date	Responsible parties
Machinery, vehicles, and generators equipment	<p>Regular environmental awareness should include potential risks associated with hydrocarbons.</p> <p>Ensure drip trays around machinery, generators and equipment are available.</p> <p>All repairs/services for machineries on site, care must be taken to prevent spillages of oil/diesel by placing proper drip trays of work on impermeable surfaces.</p> <p>Used parts for machineries such as oil filters, pipes, rags cans, must be collected and removed from site and disposed off at a hazard landfill site in Walvis Bay.</p>	Throughout the operations	Camp Manager
Storage of hydrocarbons	The hydrocarbons shall only be stored in original containers undamaged and sealed appropriately.	Throughout the operation	Camp Manager
General (spills)	<p>Any spills will be contained and cleaned immediately.</p> <p>Spill kits must be readily available on site. Training must be given to employees on how to use spill kits for remediation of potential pollution incidents.</p>	Throughout the operation	Camp Manager

14 **Action plan 2: Management of waste.**

The objective is to ensure proper storage, removal, transportation, and final disposal of all waste types.

Table 5: Waste management

Activity	Management and mitigation strategy	Action Plan	
		Frequency/targeted date	Responsible parties
General	<p>Waste shall be stored in appropriate waste containers provided by Untouched Safaris.</p> <p>No burning of waste will be allowed on site or in the park.</p> <p>Employees must be trained on waste management issued such as the importance of waste minimization, recycling.</p>	Throughout the operations	Camp Manager
Waste Collection, storage, and disposal	<p>Suitable storage containers are provided by the Lodge</p> <p>The campsite will be responsible for weekly waste collection as per refuse collection calendar.</p> <p>All waste types will be disposed of at designated Landfill Site or recycled.</p> <p>No waste is allowed to be stored or disposed in the park.</p>	Throughout the operation	Camp Manager

15 Action Plan 3: Visual Impacts

The objective of this mitigation measure is to avoid visual impacts on travellers and the nearby community of Malengalenga.

Table 6: Visual Impacts

Activity	Management and mitigation strategy	Action Plan	
		Frequency/targeted date	Responsible parties
The Adventure Camp Lodge Facility	Ensure that the operations and facilities are well maintained and kept in good order.	Throughout the operations	Camp Manager
Buildings	Only wood and canvas infrastructure	Throughout the operations	Camp Manager

Action Plan 4: Air and Noise Pollution

The objective of the mitigation plan is to prevent negative air pollution impacts emitted from the park.

Table 7: Air and Noise Pollution

Activity	Management and mitigation strategy	Action Plan	
		Frequency/targeted date	Responsible parties
Emission of Dust as a health risk	Ensure water is regularly springled in areas of the park that emits dust.	Throughout the operations	Camp Manager
Noise	Regular consultation with the neighbouring community should be done to inform them	Throughout operation	Camp Manager

	about the park activities that could temporarily cause noise pollution.		
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Action Plan 5: Social Issues and Training

The objective of this mitigation strategy is to prevent negative social impacts associated with the workforce.

Table 8: Social Issues and Training

Activity	Management and mitigation strategy	Action Plan	
		Frequency/targeted date	Responsible parties
Employees/social issues	Have a zero-tolerance policy for employees with regards to alcohol in the workplace. A First Aid Kit should always be available on site.	Throughout the operations	Camp Manager
Training & Awareness	All individual who works at the centre must undergo training on the contents of this EMP.	Throughout the operation	Camp Manager
Socio-economic	All complaints received will be reviewed and addressed for improved performance and feedback will be provided accordingly.	Throughout the operation	Camp Manager

Action Plan 5: Socio-Economic Development

The objective of this mitigation strategy is to enhance positive economic impacts.

Table 9: Socio-Economic Development

Activity	Management and mitigation strategy	Action Plan	
		Frequency/targeted date	Responsible parties
Recruitment	<p>Utilise recruitment platforms such as the recruitment database from the Regional Office to recruit unemployed members of society. Preference must be given to local communities.</p> <p>Be gender sensitive and select woman for interview, training and recruitment.</p>	Throughout the operations	Campsite Committee

Action Plan 6: Biodiversity

The objective of this mitigation strategy is to minimise potential impacts on biodiversity.

Table 10: Biodiversity

Activity	Management and mitigation strategy	Action Plan	
		Frequency/targeted date	Responsible parties
Protection of built environment	Management should ensure guided tours are conducted only within the demarcated areas.	Throughout the operations	Camp Manager

Action Plan 7: Archaeological/Heritage Areas

The objective of this mitigation strategy is to minimise potential impacts on archaeological sites.

Table 11: Archaeological/Heritage Areas

Activity	Management and mitigation strategy	Action Plan	
		Frequency/targeted date	Responsible parties
Archaeology discoveries	<p>In the event that archaeological resources are discovered, a chance find emergency procedure will be implemented which includes the following:</p> <ol style="list-style-type: none"> 1. Operations will be stopped to prevent damage. 2. An appropriate heritage specialist will be appointed to assess the find and related impacts. 3. Permit application will be made to relevant authorities if required. 	Throughout the operations	Camp Manager

Action Plan 8: Sewerage Management

The objective of this mitigation measure is to minimise potential impacts relating to the management of sewerage systems.

Table 12: Sewerage management

Activity	Management and mitigation strategy	Action Plan	
		Frequency/targeted date	Responsible parties
Sewerage	Only chemical toilets will be allowed in the park. Septic tank constructed on site is for toilets and is regularly	Throughout the operations	Camp Manager

	<p>emptied to prevent overflow (Modern wastewater system is recommended).</p> <p>Plan must be in place to monitor septic tank for damages and leakages and must be done weekly.</p>		
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17. CONCLUSIONS AND RECOMMENDATIONS

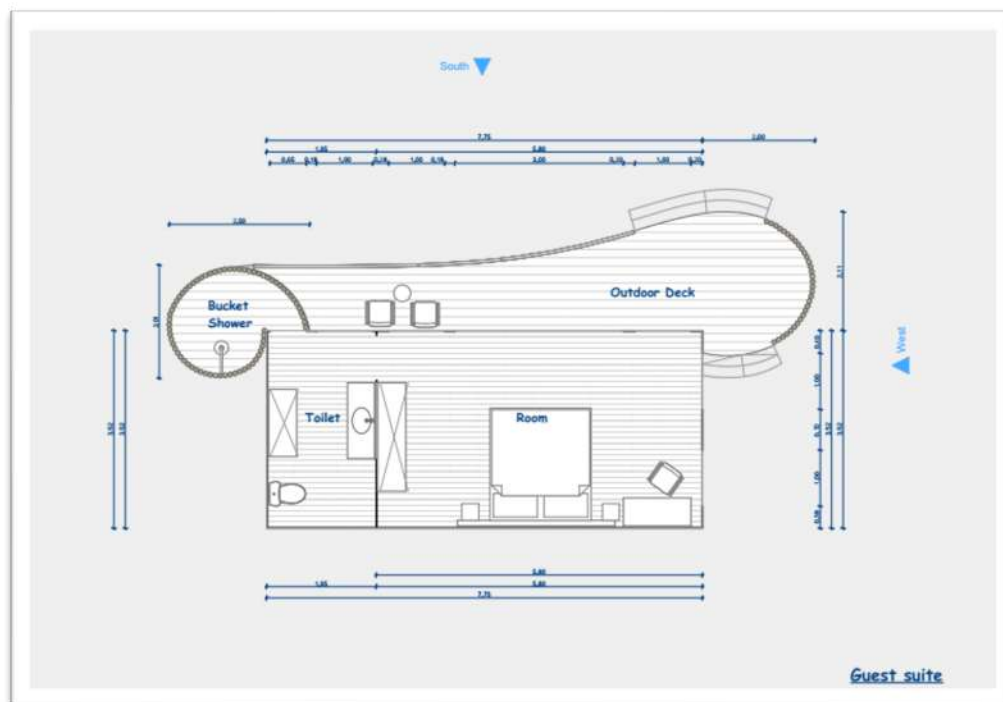
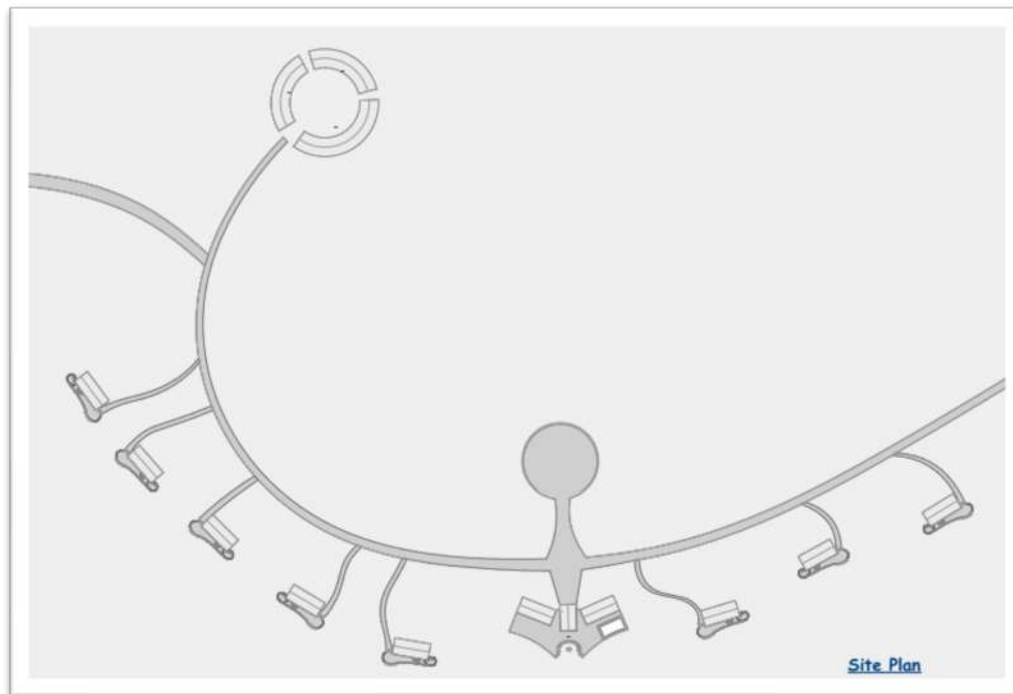
The Environmental Management Plan (EMP) must be implemented and used as an on-site reference manual. Monitoring and review must take place to ensure compliance with environmental commitments. The transgressor must be held accountable for improved performance. Approval of this EMP is required for the adventure camp lodge facility to be awarded the tourism concession and continue operating for sustainable economic development in this country.

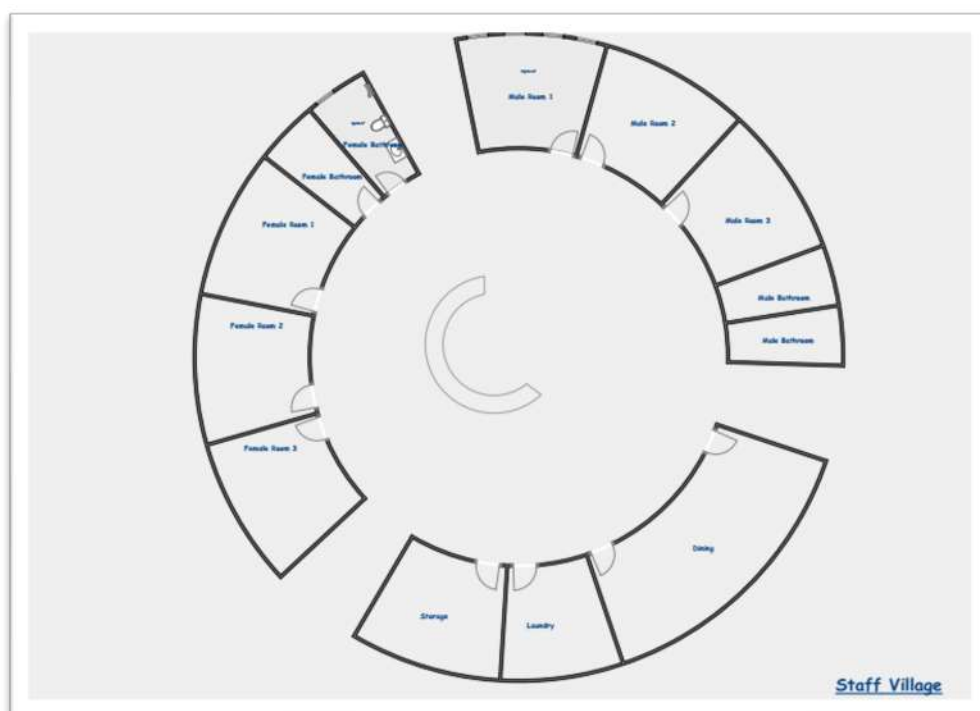
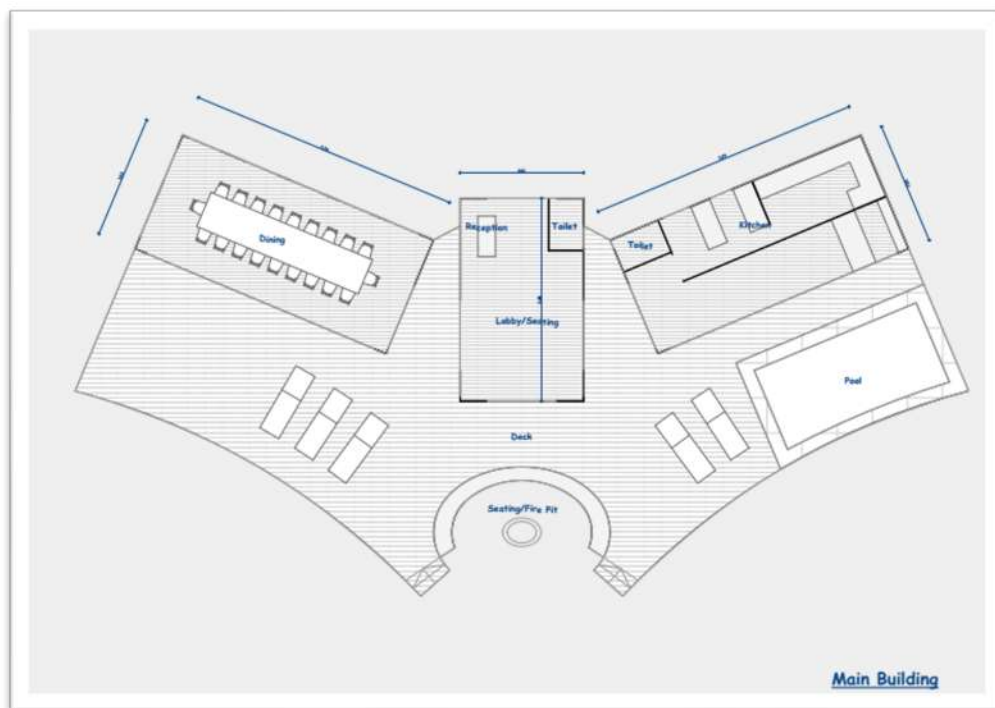
In conclusion, SM Dynamic recommends that the proposed adventure camp lodge operate in conjunction with the outlined management plan, fostering a sustainable and community-focused tourism model. This approach will not only protect the environment but also enhance the socio-economic well-being of local communities.

18. LIST OF KEY STAKEHOLDERS

Ministry of Environment, Forestry and Tourism
Ministry of Works and Transport
Mayeyi Traditional Authority
Zambezi Regional Council
Integrated Rural Development and Nature Conservation (IRDNC)
Namibia Tourism Board
Dzoti Conservancy

19. ANNEXURE A







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