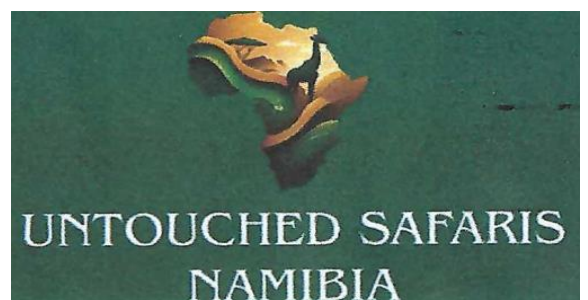


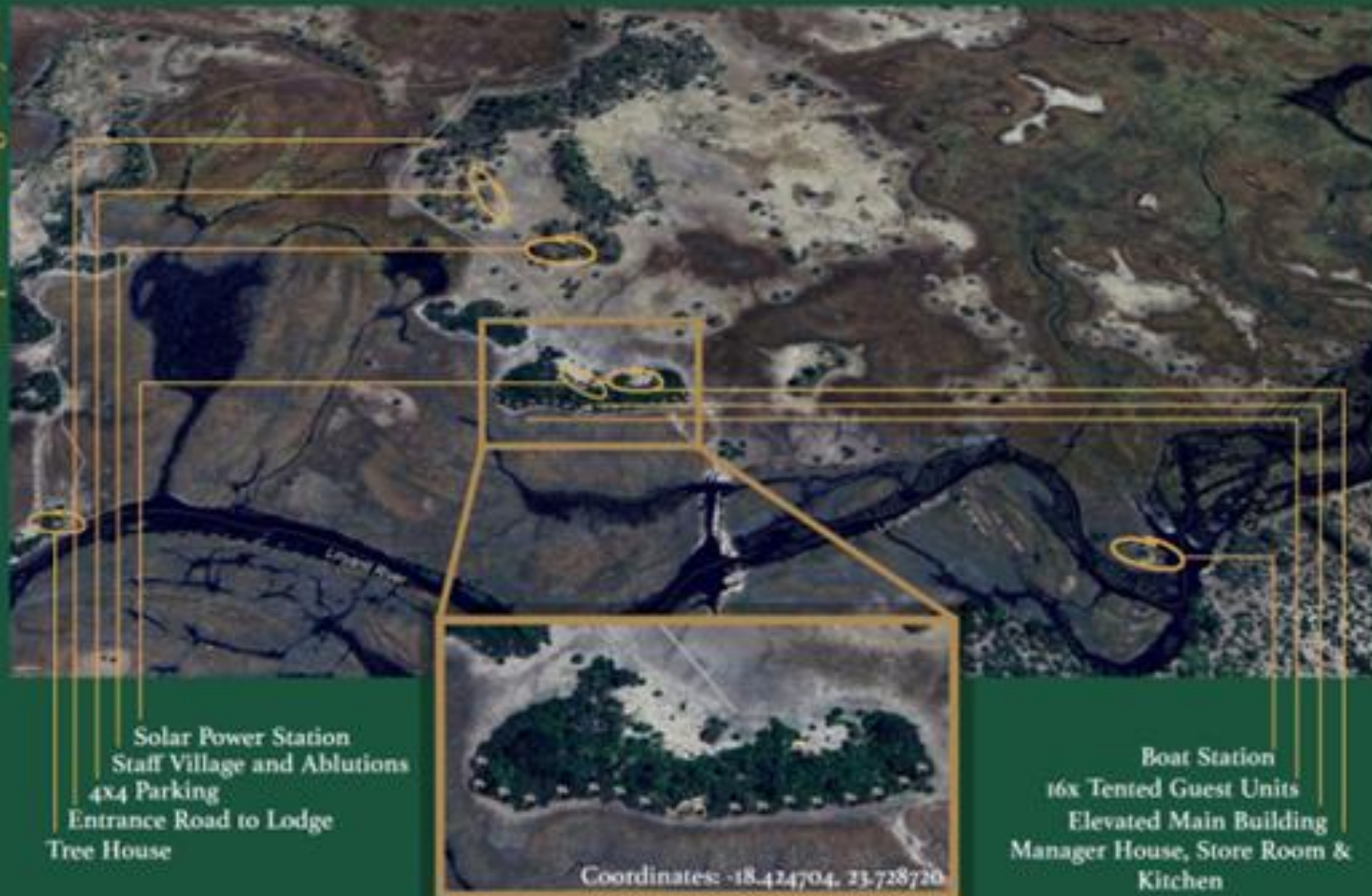
# ENVIRONMENTAL MANAGEMENT PLAN (EMP) FOR THE OPERATION AND MANAGEMENT THE LIADURA ISLAND LODGE

18 March 2025

Prepared by  
*SM Dynamic Environmental Consultants.*







### Sustainable Construction

Materials for the lodge, including the main building, guest rooms, and staff housing, will be carefully selected to minimize environmental impact.

#### Canvas



High quality canvas

#### Wood



Sustainably sourced

#### Thatching Grass

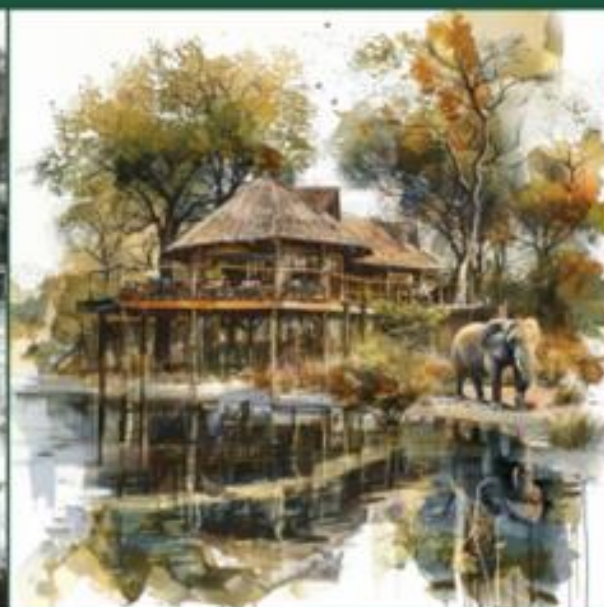


Traditional roofing



#### Main Building

ca. 180 sqm, featuring reception, bar, lounge, dining area, kitchen, public toilets, and a spacious outdoor deck of ca. 95 sqm.



#### Guest Rooms

16 elevated ensuite rooms, each ca. 65 sqm with private verandah overlooking the floodplains.

#### Fire Pit and Pool

Designed for relaxation and wildlife viewing from the main lodge area.

## TABLE OF CONTENTS

1. INTRODUCTION & SCOPE .....	1
2. OBJECTIVES .....	4
3. LEGAL REQUIREMENTS .....	4
4. BACKGROUND ON UNTOUCHED SAFARIS NAMIBIA.....	5
5. LIMITATION AND ASSUMPTIONS .....	8
6. ENVIRONMENTAL MANAGEMENT PLAN.....	8
7. RESPONSIBILITIES FOR ENVIRONMENTAL MANAGEMENT.....	8
8. TRAINING AND AWARENESS .....	9
9. ENVIRONMENTAL MONITORING .....	9
10. INCIDENT & EMERGENCY .....	10
11. EMERGENCY CONTACTS.....	10
12. COMPLAINTS HANDLING.....	11
13. COMMUNICATION AND CONSULTATION .....	11
14. ACCESS CONTROL AND INFORMATION BOARDS.....	11
15. WASTE MANAGEMENT .....	11
16. ENVIRONMENTAL ACTIVITY .....	12
17. CONCLUSIONS AND RECOMMENDATIONS.....	19
18. LIST OF KEY STAKEHOLDERS .....	20
19. ANNEXURE A .....	21
20. ANNEXURE B.....	22
21. ANNEXURE C.....	23

## PURPOSE OF THIS DOCUMENT

This document is the Environmental Management Plan (EMP) for the Operational and Management of Proposed Liadura Island Lodge in the Nkasa Rupara National Park, Zambezi Region. Untouched Safaris Namibia (USN) is a newly established safari operator dedicated to providing authentic and sustainable wildlife experiences in Namibia. Although USN is a recent entrant in the tourism industry, it is backed by the extensive expertise and support of TARUK, a renowned international tour operator with a long-standing reputation for delivering high-quality travel experiences globally within southern Africa as a focus destination.

Where to find this EMP:

Electronic copies are available on request at the following address:

[info@smdynamic.org](mailto:info@smdynamic.org)

[j.dedig@taruk.com](mailto:j.dedig@taruk.com)

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

This Environmental Management Plan (EMP) provides an overarching framework for the management and regulation of the Nkasa Rupara National Park Concession (Untouched Safaris Namibia) in line with the Tourism Development Plan for the Park to conduct and operate the following:

1. **Environmental Conservation:** the proponent is dedicated to minimizing the environmental footprint through eco-friendly practices and promoting the rich biodiversity of Nkasa Rupara National Park. Through active support of conservation efforts, the proponent aims to enhance the park's attractiveness and wildlife richness.
2. **Community Development:** Creating a significant economic opportunity for the community is a cornerstone of this project. This includes job creation, supplementary income opportunities, and empowerment through education designed to enhance their quality of life.
3. **Exceptional Guest Experience:** The lodge will offer guests a unique opportunity to immerse themselves in the natural beauty and ecological richness of the Liadura Islands. The goal is to provide an unforgettable experience that fosters a deep appreciation for Namibia's natural heritage.

The primary aim of this EMP is the sustainable utilization of a natural asset with an emphasis on biodiversity management and diverse tourism opportunities in the Nkasa Rupara National Park.

The EMP specifically aims for the following:

1. Comply with the requirement of the National Conservation Act, 2017 (Act 3 of 2017)
2. Review the current land use practice by identifying and mitigating 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 Untouched Safaris Namibia in the Park.

This Environmental Management Plan serves as a managing tool for the operation and management of the Liadura Island Lodge. The main objective of this EMP is to assist in outlining measures to be implemented to minimize adverse environmental degradation associated with the planned development.

The lodge will be strategically situated on the Liadura Islands, taking full advantage of the natural beauty and unique landscape of the Linyanti flood plains. The layout is designed to blend seamlessly with the environment, ensuring minimal disruption to the flora and fauna while providing maximum comfort and experience to guests. The reference point of the concession is situated at coordinates -18. 424704, 23.728720 adjacent to the Linyanti River, with a concession radius of 3 kilometers. Untouched Safaris Namibia will hold exclusive lodge and activity rights within this area. It is suggested that a radius of 3 kilometers from the reference point is applied, as nearly half of the potential concession area is lost south of the banks of the Linyanti River in Botswana.

Since 2006, the NamParks Project (formerly BMM Parks Project), co-funded by the Federal Republic of Germany through KfW, has helped develop these parks. Funding has been used to set up tourism, business and management plans, improve infrastructure, translocate animals back into their natural habitat and develop partnerships between the Government and communities to manage parks with other land units. Nkasa Rupara National Park forms part of the Mudumu South complex. Complexes group formally protected areas, conservancies and forestry management areas into single units to manage resources across park and conservancy boundaries. Stakeholders work together on law enforcement and anti-poaching, fire management (early burning), game monitoring and wildlife translocations. This approach is

known as integrated park management. A park management plan guides activity in Nkasa Rupara. As the area is now a National Park, the business needs to be regulated in line with the Nature Conservation Amendment Act, 2017 (Act 3 of 2017) and Environmental Management Act, 2007 (Act 7 of 2007). The business has been provisionally awarded a twenty-five-year (25-year) Tourism Concession with the following tourism rights pending approval of this EMP:

1. The right to construct the lodge at Liadura.
2. The right to provide guided safari tours, and other tourism activities.

Operating a lodge business in a National Park 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> <p>Prevent injuries, diseases, and disabilities</p> <p>Promote individuals and community from public health risks</p> <p>Provide for early detection of diseases and public health risks</p> <p>Promote public health and wellbeing</p>

#### 4. BACKGROUND ON UNTOUCHED SAFARIS NAMIBIA

Untouched Safaris Namibia (USN) is a newly established safari operator dedicated to providing authentic and sustainable wildlife experiences in Namibia. Although USN is a recent entrant in the tourism industry, it is backed by the extensive expertise and support of TARUK, a renowned international tour operator with a long-standing reputation for delivering high-quality travel experiences globally within southern Africa as a focus destination.

Untouched Safaris Namibia will hold exclusive lodge and activity rights within the designated concession area on the Liadura Islands. This includes the right to conduct a range of activities aimed at providing guests with immersive and unique experiences. The lodge will offer game drives, boat safaris, walking safaris and other activities. Additionally, we will have traversing rights throughout the Nkasa Rupara National Park, allowing for wildlife viewing. Thier activities will also extend beyond the National Park into the bordering Dzoti Conservancy, where guests can participate in community-based cultural tours and other sustainable tourism initiatives, ensuring a varied experience that benefits both the environment and the local communities.



Figure 1: Study Area

The proposed area will be constructed on an area measuring approximately 3 hectares 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:

- **Tree House:** This unique facility will offer exclusive experience with three to four guest rooms and a lounge, allowing guests to immerse themselves in the natural surroundings.
- **Boat Station:** A dedicated boat station will provide access to scenic boat trips and safaris along the Linyanti River.
- **High-Quality Kitchen and Restaurant:** A modern kitchen will serve the lodge's high-quality restaurant, ensuring an exceptional dining experience for guests.
- **Storeroom and Manager's House:** Essential facilities include a storeroom for supplies and a manager's house, ensuring smooth operations and staff welfare.

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: Locality Map

Table 2: Site Coordinates

Proposed Site location		
#	Longitude	Latitude
A	-18.424704	23.728720



## 5. LIMITATION AND ASSUMPTIONS

This Environmental Management Plan (EMP) does not include measures for compliance with statutory health and safety requirements as health and safety is 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 Tourism Concession in Nkasa Rupara National Park. 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 client's requirements and environmental best 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 for the Liadura Island lodge/untouched Safaris.

### **Lodge Manager/ Regional 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 is controlled through the implementation of security measures.
- Monitor excessive dust and noise levels and implement control measures.
- Maintain complaint register and report incidents to 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 alike. 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 because of the operational activities of the Liadura Island Lodge 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, local community, and emergency services.

**Table 3: Emergency Contacts**

Position	Phone Number	Mobile number
Site Manager	<b>081 488 8224</b>	<b>081 128 4491</b>
MEFT	<b>066 253027</b>	<b>081 129 7178</b>
Police (Sangwali Police Station)	<b>066 261300</b>	
Traditional Authority		

## 12. COMPLAINTS HANDLING

Close liaison will be maintained between the Site Manager and visitors to provide effective feedback regarding operations at the lodge. In this manner, operations can be coordinated where necessary to minimize 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

Untouched Safaris Namibia 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 include:

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

## 15. WASTE MANAGEMENT

Untouched Safaris Namibia will be responsible for refuse collection and storage facilities including recycling of waste. Scheduled weekly refuse removals must set and designated



12

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 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, generators and equipment	Regular environmental awareness should include potential risks associated with hydrocarbons.	Throughout the operations	Lodge Manager

	<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>		
Storage of hydrocarbons	The hydrocarbons shall only be stored in original containers undamaged and sealed appropriately.	Throughout the operation	Lodge 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	Lodge Manager

## 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	Lodge Manager
Waste Collection, storage, and disposal	<p>Suitable storage containers are provided by the Lodge</p> <p>The Lodge 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	Lodge Manager

### Action Plan 3: Visual Impacts

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

Table 6: Visual Impacts

Activity	Management and mitigation strategy	Action Plan	
		Frequency/targeted date	Responsible parties
Untouched Safaris	Ensure that the operations and facilities are well maintained and kept in good order.	Throughout the operations	Lodge Manager
Buildings	Only wood and canvas infrastructure	Throughout the operations	Lodge 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	Lodge Manager
Noise	Regular consultation with the neighbouring community should be done to inform them	Throughout operation	Lodge 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	Lodge Manager
Training & Awareness	All individual who works at the centre must undergo training on the contents of this EMP.	Throughout the operation	Lodge Manager
Socio-economic	All complaints received will be reviewed and addressed for improved performance and feedback will be provided accordingly.	Throughout the operation	Lodge 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	Lodge Manager

## Action Plan 6: Biodiversity

The objective of this mitigation strategy is to minimise potential impacts on the 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	Lodge 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"> <li>1. Operations will be stopped to prevent damage.</li> <li>2. An appropriate heritage specialist will be appointed to assess the find and related impacts.</li> <li>3. Permit application will be made to relevant authorities if required.</li> </ol>	Throughout the operations	Lodge 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	Lodge Manager

	<p>emptied to prevent overflow (Modern wastewater system will be installed).</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

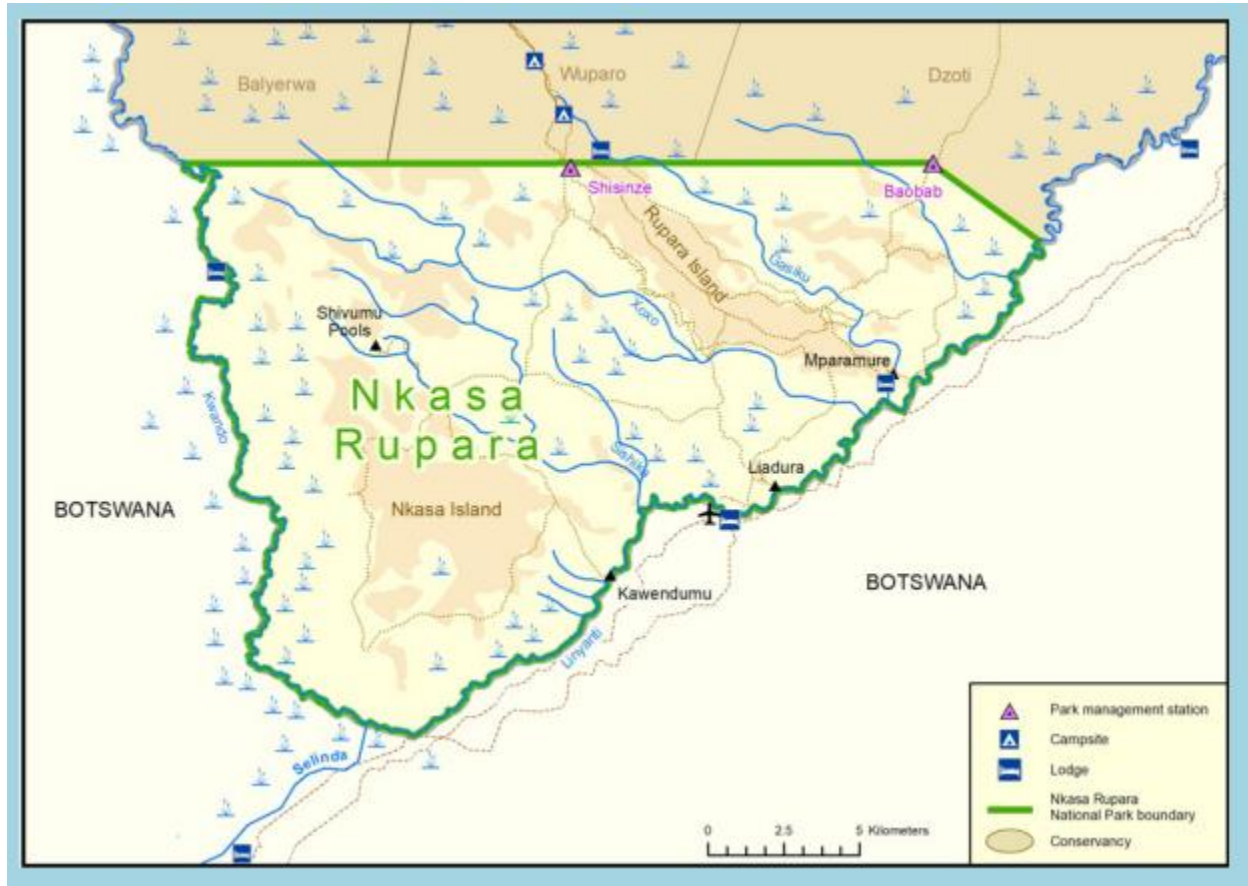
The Environmental Management Plan (EMP) must be implemented and used as an on-site reference manual. Monitoring and review must take place to ensure compliance with environmental commitments. The transgressor must be held accountable for improved performance. Approval of this EMP is required for Untouched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

Untouched Safaris Namibia is committed to its Corporate Social Responsibility Plan. It has managed to significantly contribute positively towards community development through education (providing local schools with stationaries and books), employment opportunities will be at the front of this development both upon construction and operation stage.



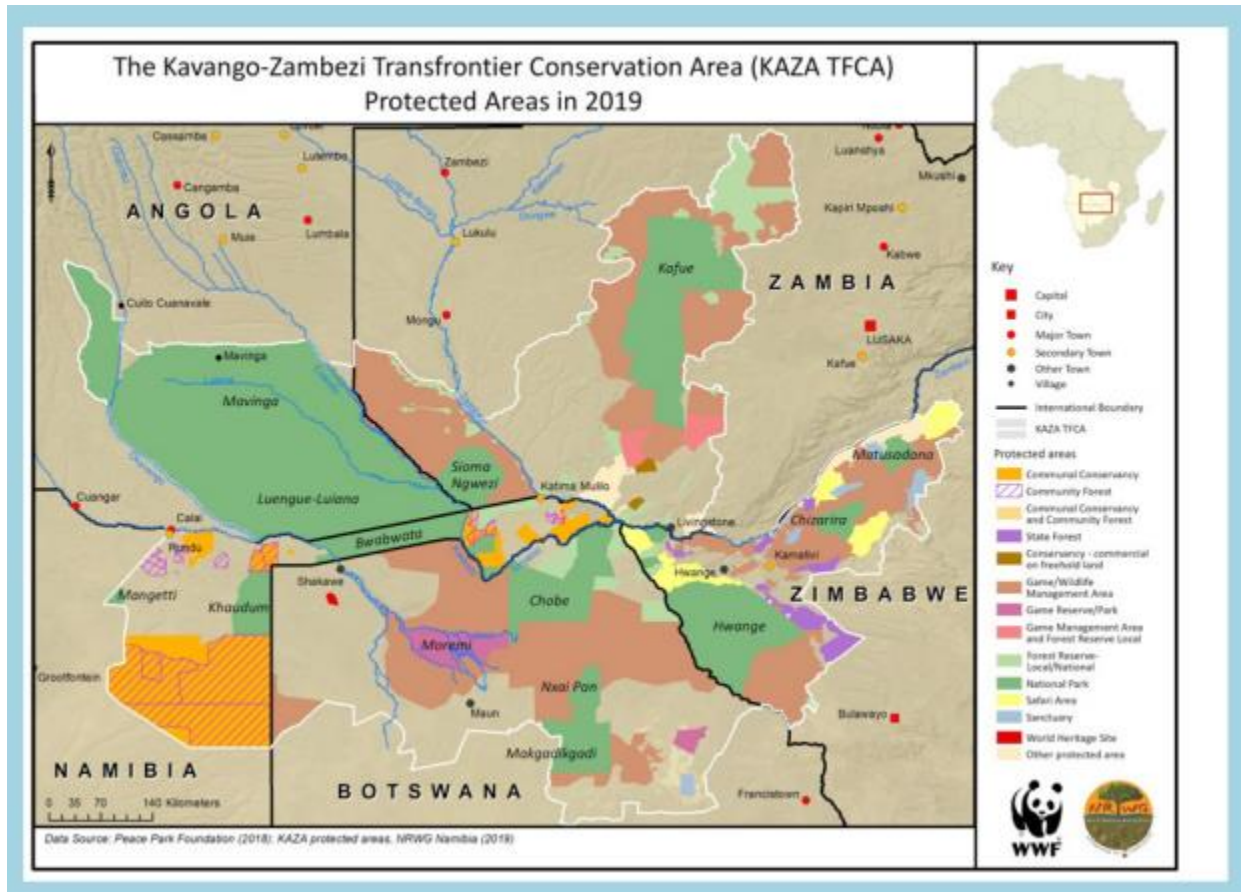
## 18. LIST OF KEY STAKEHOLDERS

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



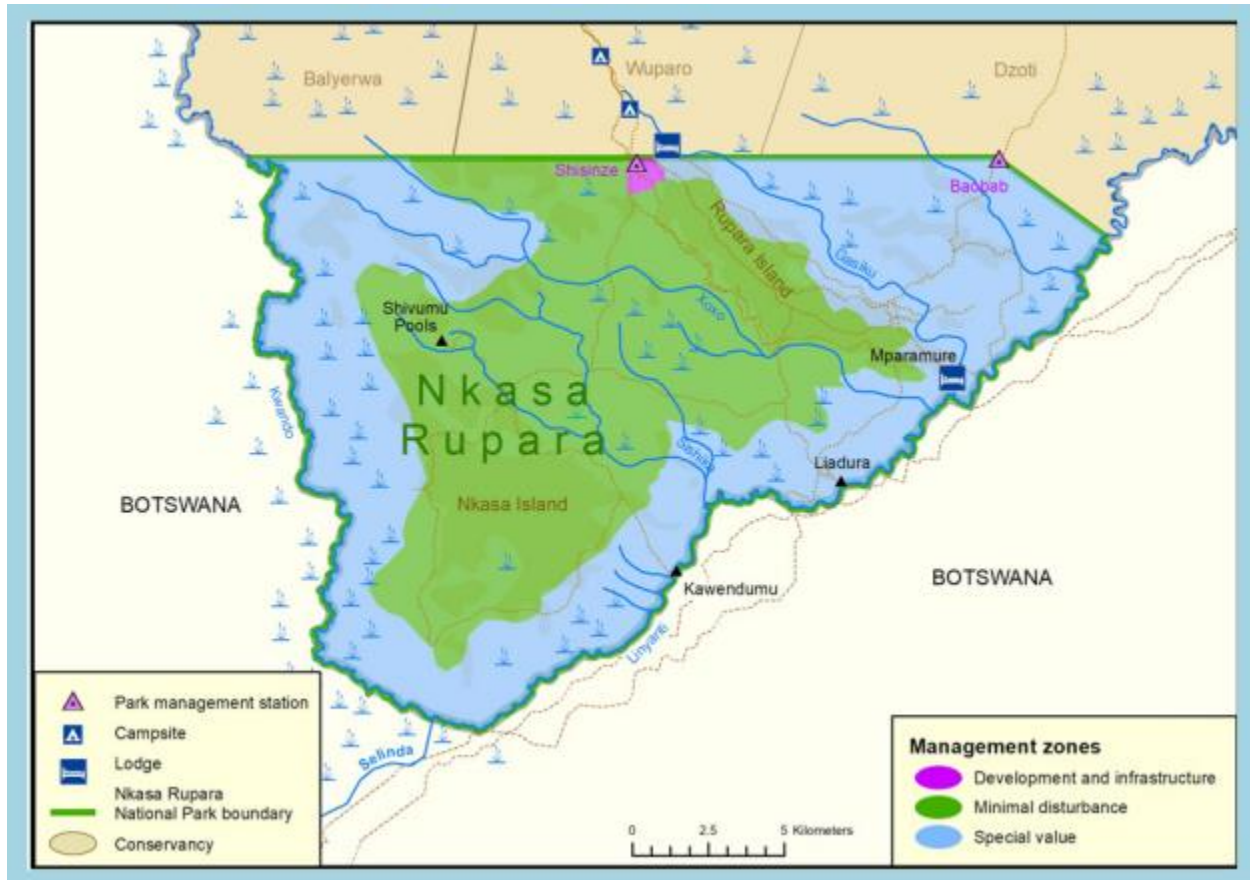
Location of Liadura Islands

## 20. ANNEXURE B



The Kavango Zambezi Transfrontier Conservation Area (KAZA TFCA)

## 21. ANNEXURE C



Special Value Management Zone





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