



S M DYNAMIC
ENVIRONMENTAL CONSULTANTS

**ENVIRONMENTAL MANAGEMENT PLAN FOR THE OPERATION AND MANAGEMENT OF VILLA SABUTA LODGE AT
LISELO, ZAMBEZI REGION**

APPLICATION REFERENCE NUMBER: APP6493

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TABLE OF CONTENTS

1.	INTRODUCTION AND SCOPE.....	1
2.	OBJECTIVES.....	4
3.	LEGAL REQUIREMENTS	5
4.	BACKGROUND ON THE LODGING TOURISM IN ZAMBEZI	5
5.	LIMITATIONS 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	9
11.	EMERGENCY CONTACTS.....	10
12.	COMPLAINTS HANDLING.....	10
13.	COMMUNICATION AND CONSULTATION.....	10
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	19
19.	ANNEXURE A.....	20
20.	ANNEXURE B.....	21

PURPOSE OF THIS DOCUMENT

This Environmental Management Plan (EMP) has been prepared to outline how Villa Sabuta Lodge 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.

Mr Simataa Sabuta is the proponent of this project and the business co-owner of Villa Sabuta Lodge, which intends to submit an application for an Environmental Clearance Certificate (ECC) for the operation and management of its lodge establishment situated in the Liselo area within the Katima Mulilo Townland of the Zambezi Region.

Where to find this EMP:

Electronic copies are available on request at the following address:

info@smdynamic.org (Box 8387, Swakopmund, +264 81 144 3800)

ssabuta@s4trading.co.na (Box 115 Katima Mulilo, +264 81 345 1261)

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	Mafwe Traditional Authority

1. INTRODUCTION AND SCOPE

Mr Simataa Sabuta is the project proponent and the co-owner of Villa Sabuta lodge, which plans to apply for an Environmental Clearance Certificate (ECC) to operate and manage its currently active lodging facility located in the Liselo area of Katima Mulilo Townland, Zambezi Region. The proprietor has converted a portion of his privately owned land and built six self-contained apartments for lodging on a section of a 40,000 m² parcel. The business has the potential to drive local and national economic development through job creation. However, as a development of this nature falls within listed land-use activities, Namibian environmental regulations mandate an Environmental Clearance Certificate (ECC) and, in some cases, a full Environmental Impact Assessment (EIA) before lawful operation.

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 Zambezi Region.

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 the client on biodiversity and heritage resources within the Liselo area.
3. Develop guidelines and an associated code of conduct for Villa Sabuta Lodge.
4. Develop a coordinated approach to implement, monitor and enforce this EMP.
5. Identify the roles and responsibilities of the lodge personnel and other stakeholders in the implementation and enforcement of this EMP.
6. Sustain and strengthen a constructive partnership between the proponent and the relevant authorities.
7. Manage future growth and diversity of Villa Sabuta lodge.

This Environmental Management Plan (EMP) functions as the management tool for the operation and administration of Villa Sabuta lodge in Liselo, Zambezi. The primary purpose of this EMP is to

define measures that will be implemented to minimise potential environmental degradation associated with the proposed development.

The Proponents have converted part of their privately owned property and established six self-contained rooms for lodging and a campsite, in addition to their dwelling unit. This prior disturbance reduces the likelihood of significant negative environmental impacts. The site is situated in a communal, undeveloped, and unserviced area approximately 7 km from Katima Mulilo town centre.



Figure 1: Lodging units

Villa Sabuta's lodge operation in the Zambezi Region intends to blend natural colours and materials into its construction and landscaping to reduce visual impact and achieve harmony with the surrounding environment. Key construction and operational activities include:

1. **Minimal Vegetation Clearing:** Efforts have been 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 Source:** The main source of freshwater is via a Namwater supply connection, which already exists, and an existing borehole has been constructed to ensure an adequate supply of water for the small stock farming unit and garden project, ensuring that water needs are sustainably met.

SM Dynamic has been commissioned to develop the Environmental Management Plan (EMP) and to facilitate the Environmental Impact Assessment (EIA) process required to secure an Environmental Clearance Certificate. The study seeks to employ innovative approaches to natural resource management and to ensure adherence to applicable laws. The Namibian Constitution, especially Articles 91(c) and 95, establishes a framework for the sustainable use of natural resources for the benefit of current and future generations of Namibians.



Figure 2: Rental unit

The project is already under development and partially operating its first phase in the Liselo area, covering approximately 40,000 m² (4 hectares) at latitude -17.5816810 and longitude 24.2296700. This site presents an opportunity to balance development with ecological conservation, mixed land-use farming, and tourism within the Katima Rural constituency.

Operating a tourism business in Namibia falls under the listed activities in Government Notice No. 30 of the Environmental Impact Assessment regulations of the Environmental Management Act No. 7 of 2007 (EMA). These listed activities are activities that cannot be undertaken without an Environmental Clearance Certificate.

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 a timely and careful manner.
- 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 ensure 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 that 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	The objective of this Act is to: - 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 THE LODGING TOURISM IN ZAMBEZI

Katima Mulilo's location is strategically advantageous for boosting tourism activities. There has recently become evident a growing demand for lodging among travellers and visitors. Guesthouse tourism in Namibia's Zambezi Region offers diverse experiences, ranging from riverside stays in Katima Mulilo to tranquil retreats near national parks, with opportunities for wildlife viewing, boat cruises, birding, and cultural tours. Guesthouses such as Villa Sabuta Lodge,

Namu Self-Catering Apartment, and Ndjangula Guesthouse contribute unique Zambezi hospitality and activities, helping to position the region as a premier destination for nature and culture.

The Zambezi Region is renowned for its lush riverine landscapes along the Zambezi River, which create a tranquil yet vibrant environment rich in wildlife and diverse ecosystems. The region's distinctive combination of natural beauty and local culture makes it a standout tourist destination.

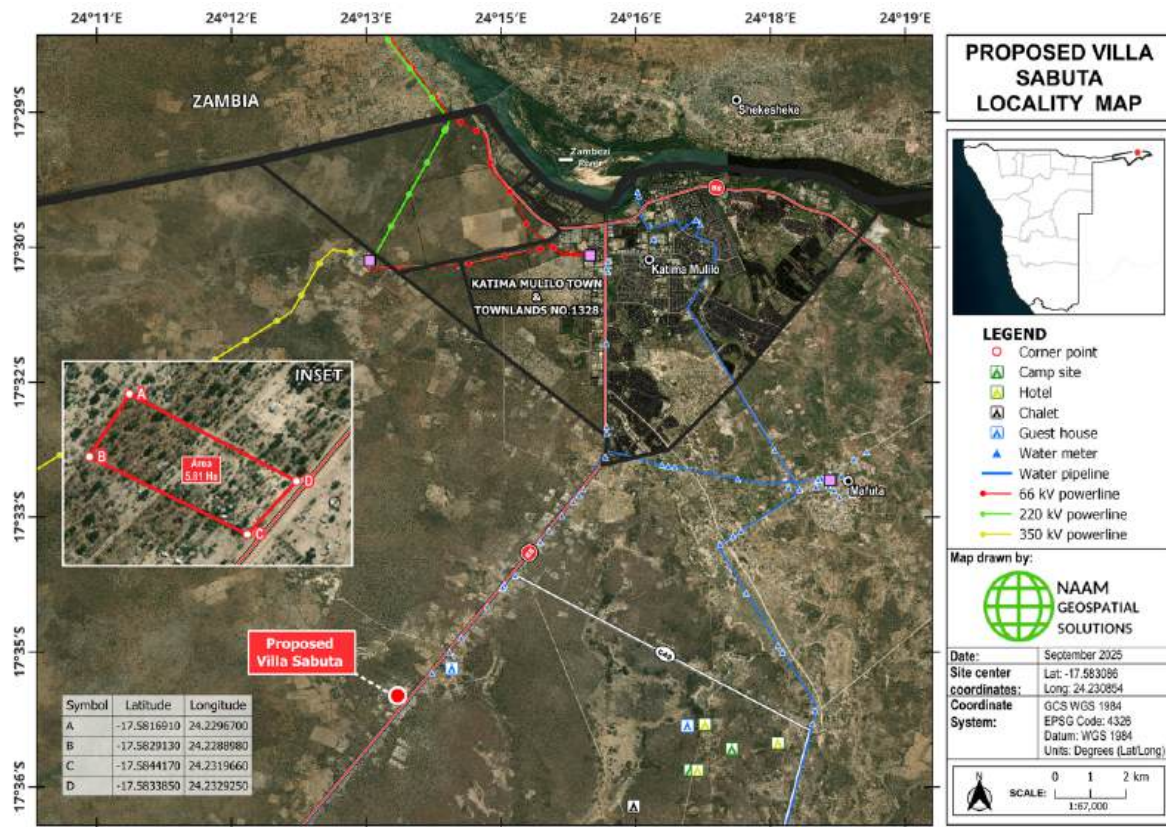


Figure 3: Study Area

The following activities form part of the existing amenities of Villa Sabuta Lodge:

- Guest suite (6 units)
- Fire pit/ Braai facilities
- Outdoor dining area & shower
- Free parking

- Main House
- Swimming pole
- Reception, Farm shop

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 4: Swimming Pool

Table 2: Site Coordinates

Proposed Site location		
#	Longitude	Latitude
A	-17.5816910	24.2296700
B	-17.5829130	24.2288980
C	-17.5844170	24.2319660
D	-17.5833850	24.2329250

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 Operation and Management of Namu Self-Catering. 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 facility is 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 facility.

Camp Manager

- 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 the environmental 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 relevant 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 Lodge Manager to ensure that the environmental controls are 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 Lodge, which include regulatory authorities, the local community, and emergency services.

Table 3: Emergency Contacts

Position	Landline Number	Mobile number
Lodge Manager		081 345 1261
MEFT	066 253027	081 129 7178
Police Station	066 261300	
Fire Station		081 379 4559
Hospital	066 25 1402	

12. COMPLAINTS HANDLING

Close liaison will be maintained between the Lodge Manager and visitors to provide effective feedback regarding operations at the facility. In this manner, operations can be coordinated where necessary to minimise disturbance to other neighbouring communities and ensure prompt response to complaints, should they occur. The Lodge 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 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 lodge's future development proactively and responsively through meetings, local newspapers, leaflets, and at local & traditional authorities.

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.



Figure 5: Water Supply

15.WASTE MANAGEMENT

The Lodge 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 be recorded and reported to the park authorities. No mechanical workshop will be permitted at these premises.



Figure 6: Water storage

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	Regular environmental awareness should include potential risks associated with hydrocarbons. Ensure drip trays around machinery, generators and equipment are available. 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. Used parts for machineries such as oil filters, pipes, rags cans, must be collected and removed from site and disposed off at a designated dumpsite in Katima Mulilo.	Throughout the operations	Lodge Manager
Storage of hydrocarbons	The hydrocarbons shall only be stored in original containers undamaged and sealed appropriately.	Throughout the operation	Lodge Manager
General (spills)	Any spills will be contained and cleaned immediately. 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.	Throughout the operation	All personnel

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	Waste shall be stored in appropriate waste containers provided by the Lodge. No burning of waste will be allowed on site or in the park. Employees must be trained on waste management issued such as the importance of waste minimization, recycling.	Throughout the operations	All Personnel
Waste Collection, storage, and disposal	Suitable storage containers are provided by the Lodge The campsite will be responsible for weekly waste collection as per refuse collection calendar. All waste types will be disposed of at designated dumpsite or recycled.	Throughout the operation	All Personnel

Action Plan 3: Visual Impacts

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

Table 6: Visual Impacts

Activity	Management and mitigation strategy	Action Plan	
		Frequency/targeted date	Responsible parties
Villa Sabuta Lodge's facility	Ensure that the operations and facilities are well maintained and kept in good order.	Throughout the operations	Lodge Manager
Buildings	Approved building plan in accordance with the Town Planning requirements	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 to the surrounding community.

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 sprinkled in areas of that emits dust (gravel access roads).	Throughout the operations	Lodge Manager
Noise	Regular consultation with the neighbouring community should be done to inform them about the facility's activities that could temporarily cause noise pollution.	Throughout the operation	Lodge Manager

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 facility 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	LodgeManager

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	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. Be gender sensitive and select woman for interview, training and recruitment.	Throughout the operations	Lodge Manager

Action Plan 7: 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	Lodge Manager

Action Plan 8: 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	In the event that archaeological resources are discovered, a chance find emergency procedure will be implemented which includes the following: 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	Lodge Manager

Action Plan 9: 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. Septic tank constructed on site is for toilets and is regularly emptied to prevent overflow (Modern wastewater system is recommended). Plan must be in place to monitor septic tank for damages and leakages and must be done weekly.	Throughout the operations	Lodge Manager

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 lodge facility to be awarded the Environmental Clearance Certificate and continue operating for sustainable economic development in both the Region and the country at large.

In conclusion, SM Dynamic recommends that Villa Sabuta Lodge be allowed to 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

Table 13: Key stakeholders

Ministry of Environment, Forestry and Tourism
Mafwe Traditional Authority
Zambezi Regional Council
Namibia Tourism Board
Namibia Tourism Board
Zambezi Regional Business Community



SM Dynamic Environmental Consultants.
5973 Ocean View, Swakopmund.

P.O. Box 8387
Swakopmund, Namibia

info@smdynamic.org

www.smdynamic.org