

ENVIRONMENTAL MANAGEMENT PLAN (EMP): 2026-2028
for
LOSANGE LODGES (Pty) LTD t/a BUSH CAMP by CAMP KWANDO
in the MAYUNI CONSERVANCY, ZAMBEZI REGION
REQUEST for a NEW
ENVIRONMENTAL CLEARANCE CERTIFICATE (ECC)



Figure 1: Signage board indicating the turn-off from the B8 to Bush Camp (E Klingelhoefter).

APP reference number issued by the EC office of MEFT *APP 251222-006838*

PROPONENT

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Editor: Dr Marion Schramm

15 January 2026

Dr. Ekkehard Klingelhoefter: Environmental Assessment Practitioner (EAP)

**ENVIRONMENTAL MANAGEMENT PLAN (EMP) for Losange Lodges (Pty) LTD t/a BUSH CAMP
APP 251222-006838**

**APPLICATION FOR THE ENVIRONMENTAL CLEARANCE CERTIFICATE (ECC)
for BUSH CAMP by CAMP KWANDO of LOSANGE LODGES (Pty) LTD**

No. 4878

Government Gazette 6 February 2012

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**ANNEXURE 1
FORMS**

Form 1

**REPUBLIC OF NAMIBIA
ENVIRONMENTAL MANAGEMENT ACT, 2007**

(Section 32)

APPLICATION FOR ENVIRONMENTAL CLEARANCE CERTIFICATE



PART A: DETAILS OF APPLICANT

- | | |
|---|---|
| 1. Name: (person or business) | Losange Lodges (Pty) LTD t/a Bush Camp |
| 2. Business Registration / Identity No. (if applicable) | CC/2004/037 |
| 3. Correspondence Address: | P. O. Box 8016, Kongola, Zambezi Region |
| 4. Name of Contact Person: | Mrs. Anke Schwalbenbach-Levin |
| 5. Position of Contact Person: | Manager |
| 6. Telephone No.: | +264 (0) 81 865 3052 |
| 7. Fax No.: | N/A |
| 8. E-mail Address : (if any) | EAP: ekkehardwk@gmail.com and
Manager: info@campkwando.com |

☐ Tick () the appropriate box

**ENVIRONMENTAL MANAGEMENT PLAN (EMP) for Losange Lodges (Pty) LTD t/a BUSH CAMP
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PART B: SCOPE OF THE ENVIRONMENTAL CLEARANCE CERTIFICATE

1. The environmental clearance certificate is for:

- ☒ Hospitality operation at Bush Camp, Mayuni Conservancy
- ☒ To operate four (4) exclusive campsites
- ☒ To request for a new ECC

2. Details of the activity(s) covered by the environmental clearance certificate:

[Note: Please attach plans to show the location and scope of the designated activity(s), and use additional sheets if necessary: Please refer to BID and EMP for more details]

Title of Activity: Tourism (camp sites) on eastern bank of Kwando River
Nature of Activity: Offer 4x exclusive camps
Location of Activity: Latitude South: 17.85000 and Longitude East: 23.46111
Scale and Scope of Activity: Carbon Footprint impact low on a ca. 6ha plot

PART C: DECLARATION BY APPLICANT

I hereby certify that the particulars given above are correct and true to the best of my knowledge and belief. I understand the environmental clearance certificate may be suspended, amended or cancelled if any information given above is false, misleading, wrong or incomplete.


	Ekkehard Klingelhoef	Appointed EAP
Signature of Applicant	Full Name in Block Letters	Position
on behalf of	Losanges Lodges t/a Bush Camp	15 January 2026
		Date

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CONSULTING TEAM

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2	Marion	Schramm	Editor	namtours@iafrica.com.na

ACRONYMS

BC	Bush Camp
BID	Background Information Document
EC	Environmental Commissioner
EAP	Environmental Assessment Practitioner
ECC	Environmental Clearance Certificate
EEC	Employment Equity Commission
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
GDP	Gross Domestic Product
KAZA TFCA	Kavango-Zambezi Trans Frontier Conservation Area
MAFWLR	Ministry of Agriculture, Fisheries, Water and Land Reform
MEFT	Ministry of Environment, Forestry and Tourism

ABSTRACT

Bush Camp opened its doors as a tourism destination in the second half of 2019. In December 1999 the Mayuni Conservancy was registered and its management committee granted Bush Camp permission in November 2018 to operate 4 campsites. Bush Camp (previously called Mazambala Campsite), is strategically located (3km from the B8) along the Trans Caprivi Highway.

The Background Information Document (BID) submitted on 31 December 2025 provides background information relevant to this EMP. The carbon footprint of Bush Camp covers only a minor area of 6ha of the allocated 43.3ha which remains untouched.

The uniqueness of Bush Camp is that 80% of all solid waste is removed regularly by a private company and sorted and taken for recycling. The residue of paper and plastics is burnt on site in a sand pit. Grey and black water is removed regularly pending on tourist numbers and discarded in a pit 350m east of the Kwando River.

The current site for solid waste storage, out of view from guests, needs to be fenced off and secured with a gate; each waste type to be separated into containers ready for transport.

Licenses for the water abstraction (from the 80m borehole) and the effluent discharge are in process to be finalized with the Department of Water Affairs at the Ministry of Agriculture, Fisheries, Water and Land Reform.

“Best practices” regarding waste management is being implemented by management at Bush Camp:

- **avoid, minimize or remedy adverse impacts to the environment**
- **enhance the environmental and social benefits**
- **ensure that residual adverse impacts are kept within acceptable levels**

There is a current trend in Namibia where people seek for remote places with limited infrastructure which Bush Camp offers. The Proponent is encouraged to keep the 4 campsites which blend into the environment as they are. Upgrades are not recommended – keep Bush Camp simplistic.

In summary: Bush Camp operates 4 exclusive campsites in a remote and sensitive area of the Kwando River floodplains and attracts mainly guests from the SADC region. Solids (80%) are regularly removed from Bush Camp, and the 20% residue of paper and plastic is burnt on site in a sand pit. The grey and black water is removed at frequent intervals, pending on tourist numbers, and deposited in a sand pit (soak-away) 350m from the channel of the Kwando River.

SECTION 1: OVERVIEW: INSTRUCTIONS, LOCALITY, LAYOUT, INFRASTRUCTURE, EMP OBJECTIVES for BUSH CAMP

Operation of 4 exclusive campsites on the eastern banks of the Kwando River wetland located in the Mayuni Conservancy of the Zambezi Region

1. INTRODUCTION

Background information: Losange Lodges (Pty) Ltd opened its doors as a tourism destination at Camp Kwando in 1993. On 18 August 2018 Losange Lodges entered into a Joint Venture (JV) with the MAYUNI Conservancy (**Doc 1**) and agreed to construct 4 up-market private campsites at the existing but run-down *Mazambala Campsite* (now referred to as Bush Camp). In the second half of 2019 Bush Camp opened to the public offering 4 exclusive campsites which are located along a channel east of the Kwando River, 2.6km from the B8 (**pers. com. A. Schwalbenbach-Levin**). Bush Camp is being co-managed by Camp Kwando office and the current operational manager at Bush Camp is:

- Mr. Roxy Tembwe who is based at Bush Camp

The owners of Bush Camp are Swiss investors residing in Switzerland. Camp Kwando was initiated and financed by them in 1993 and in 2018 the decision was made to acquire and to improve the current Mazambala Campsite through a JV with the Mayuni Conservancy.

Since the JV with the Mayuni Conservancy in 2018, management has spent considerable funds to revamp the existing Mazambala Campsite into four exclusive campsites each with their own ablution and kitchen facility, now referred to as Bush Camp.

EAP appointment: Dr Ekkehard Klingelhoefter, the appointed EAP (**Doc 2**), was requested to formally apply for an Environmental Clearance Certificate (ECC). It was further requested that the EAP ensure that the **water abstraction** license (from the borehole) and the **effluent discharge** license, as prescribed by the Ministry of Agriculture, Fisheries, Water and Land Reform (MAFWLR), are secured.

During the visit of the EAP in August and November 2025, it was observed that Bush Camp offers the guests a unique experience in a remote wetland area where elephants and hippopotami seasonally roam.

Following discussions with EC Mr. Mufeti and his staff, it was requested that, since Camp Kwando and Bush Camp are located at different water masses of about 35km apart, separate applications for the ECCs are to be requested, with each application having its own EMP (**Doc. 3**).

The rustic ambience at Bush Camp invites guests to relax in a friendly and conducive eco-environment. From the deck, referred to as Mad Max, the Kwando River wetland can be viewed.

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The objective of this EMP, was to re-emphasize that the *key action verbs* applicable at every lodge and camp operating in Namibia, should focus on: **to rethink** on how to **reduce**, to **reuse**, to **recycle solid wastes**. In addition, the EAP was guided by:

- observations made at Bush Camp in August and November 2025
- the Waste Management Policy of 2018 (MEFT)
- the Guide of 2008 to the EMP of Act No 7 of 2007
- emails and discussions held with the Proponent between August and December 2025
- Water Resource Act of 2013 and Water Resource Regulation of 2023

Note: Together with this report the Background Information Document (BID dated 15 December 2025) needs to be consulted. The BID provides an overview of the current status of Losange Lodges (Pty) LTD t/a Bush Camp (refer to Part 2 of the bound copy submitted to the EC office). An electronic version of the BID was submitted on portal on 22 December 2025.

2. LOCALITY

Bush Camp is situated on a side channel of the Kwando River wetland ecosystem (**Fig. 2, Fig. 3 & Fig. 4**) and can be reached by vehicle from Kongola along the B8. The coordinates for Bush Camp recorded at the reception area (**Table 1**) are as follows with a carbon footprint expressed in ha:

NAME	LATITUDE (South)	LONGITUDE (East)	AREA (ha)
Bush Camp	17.85000	23.46111	43.3 but only use 6 (Fig. 3)



Figure 2: The location of Bush Camp (▲), east of the Kwando River (google maps).
BNP = Bwabwata National Park; = road to the B8 highway

As per JV Agreement, the area allocated to Losange Lodges (Pty) LTD is 43.3ha of which Bush Camp currently only makes use of 6ha (**Fig. 3**). Google earth map of 2026 was used to delineate the 43.3 ha and the 6ha currently utilized. Further expansions are envisaged, however, not in the immediate future.



Figure 3: Satellite image indicating portion of land allocated (43.3ha) on a lease agreement JV between Mayuni Conservancy and Losange Lodges (Pty) LTD (**in RED**), for Bush Camp.

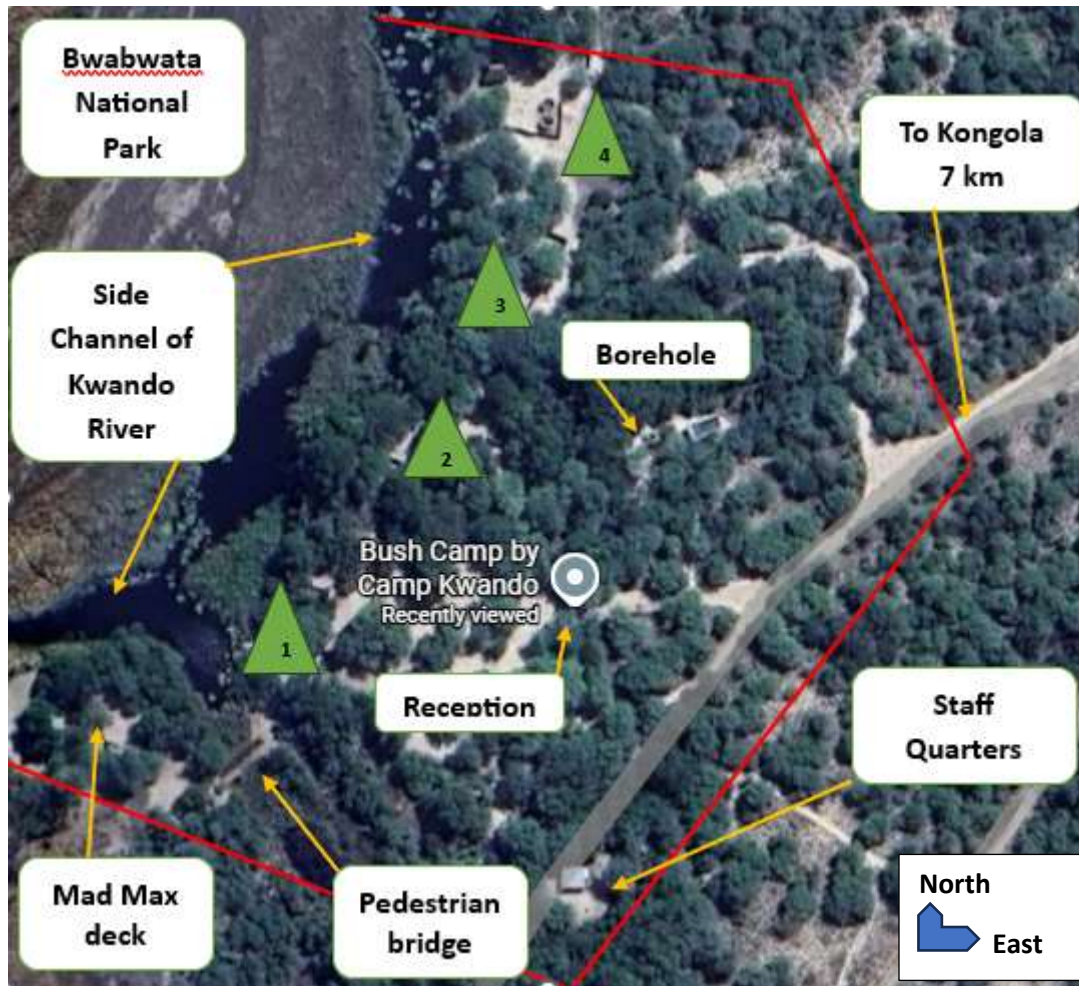


Figure 4: Satellite image indicating the location of Bush Camp (red block), on a 6ha raised landscape on the eastern bank of the Kwando River, (google maps).

▲ = Campsite No. 1 to 4

3. COMPANY OVERVIEW: the PROPONENT

3.1 Name and activity at Bush Camp

Bush Camp is operating as a tourism entity catering mainly for tourists from the SADC region. The focus of Bush Camp is to provide the tourists with a unique wildlife experience within the heart of the KAZA TFCA, which includes:

- Mokoro trip on the channels of the Kwando River
- Bird watching (490 species recorded in the Zambezi Region)
- Fishing (catch and release)

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**Table 1: GPS (in degree and decimals) of
Bush Camp layout of campsites and main infrastructure along the eastern banks
of the Kwando River**

No.	POSITION	COORDINATES (GPS)	COORDINATES (in dd)
1	Turn-off at B8	S Lat 17° 40' 18" and E Long 23° 21' 53"	S 17.71666 and E 23.49722
2	Entrance	S Lat 17° 48' 28" and E Long 23° 20' 54"	S 17.85000 and E 23.48333
3	Reception	S Lat 17° 48' 34" and E Long 23° 20' 46"	S 17.89444 and E 23.46111
3	Mad Max deck with pool	S Lat 17° 48' 34" and E Long 23° 20' 42"	S 17.89444 and E 23.45000
4	Staff quarters	S Lat 17° 48' 36" and E Long 23° 20' 46"	S 17.90000 and E 23.46111
5	Borehole with holding tanks	S Lat 17° 48' 32" and E Long 23° 20' 46"	S 17.88888 and E 23.46111
6	Workshop	S Lat 17° 48' 31" and E Long 23° 20' 47"	S 17.88611 and E 23.46388
6	Campsite 1	S Lat 17° 48' 33" and E Long 23° 20' 44"	S 17.88888 and E 23.45555
7	Campsite 2	S Lat 17° 48' 32" and E Long 23° 20' 44"	S 17.25833 and E 23.45555
8	Campsite 3	S Lat 17° 48' 30" and E Long 23° 20' 46"	S 17.88333 and E 23.46111
9	Campsite 4	S Lat 17° 48' 28" and E Long 23° 20' 47"	S 17.87777 and E 23.46388

3.2 The Proponent

Losange Lodges (Pty) Ltd was founded and registered as a tourist operating company by a group of Swiss investors. In 2018, the company signed a JV with the Mayuni Conservancy to operate campsites at the old Mazambala Campsite now referred to as Bush Camp. For additional information reference is to be made to the BID submitted on 22 December 2025 (MEFT Portal).

Camp Kwando applied for a certificate to commence business as Losange Lodges (Pty) Ltd. t/a Camp Kwando: Registration no. of the Company allocated on 9 February 2004 is: 2004/037 (**refer to the BID Part 2 bound copy and the electronic version submitted on 22 December 2025**). Since 2018 Bush Camp has been included in the tourism operation.

The Proponent is hereby applying for an Environmental Clearance Certificate (ECC) to operate the 4 exclusive campsites at Bush Camp.

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3.3 Staff complement

Bush Camp employs staff from adjacent villages of the Mayuni Conservancy as follows:

- Operational manager (camp and reception) x1
- Gardeners/camp cleaners x2
- Security x1

3.4 Vision of Bush Camp:

- to ensure that every guest receives a wildlife experience in an environment that is being managed and operated on eco-friendly principles
- management is committed to comply and adhere to all the Policies, Acts and Regulations that govern lodge operations in sensitive environments
- to retain the respect and trust of the adjacent communities
- to strive to **reduce, reuse** and to **recycle waste** where and whenever possible

3.5 Operation of Bush Camp

For Bush Camp to be accredited as an operating tourism destination, as prescribed by the Environmental Management Act and Regulation No. 7 of 2007 (**Table 2**), the company needs to apply for an ECC and to submit an EMP.

Table 2: Regulation 29 to conform to, based on the type of activity conducted.

Legislation	Description of listed activity	Relevance to proposed activity
Regulation 29 of: Government Notice No. 29 of 2012	TOURISM DEVELOPMENT ACTIVITY 6: The construction of resorts, lodges, hotels or other tourism hospitality facilities	EXISTING & OPERATIONAL LODGE & CAMP <u>Note:</u> No EIA but only an EMP is to be conducted

The Proponent of Bush Camp is committed to comply and has therefore appointed Dr E Klingelhoetter of Atlantic Consulting Services CC/ 2021/03824 as the Environmental Assessment Practitioner (EAP), to assist this company in the application for an Environmental Clearance Certificate (ECC) based on the EMP.

The tasks are as follows

- to ensure that the Environmental Management Plan (EMP) for Bush Camp addresses all possible impacts and make recommendations for mitigation
- to keep track of implementation
- to ensure that a rigorous waste management protocol is in place and that current waste storage for solid waste is tidied up and fitted with a fence and a gate
- to apply for water abstraction (borehole and surface) and discharge of effluent licenses with the Directorate of Water Affairs of the MAFWLR

4. ENVIRONMENTAL ASSESSMENT PRACTITIONER (EAP)

- The Proponent has appointed Atlantic Consulting Services, Dr Ekkehard Klingelhoetter, as the Environmental Assessment Practitioner (EAP) as of 6 December 2025 (**Doc 2** attached).
- The EAP hereby brings to the attention of the Ministry of Environment, Forestry and Tourism (MEFT) in accordance with the Environmental Management Act (7 of 2007), the intentions of the Proponent to operate their tourism establishment within the Mayuni Conservancy of the Zambezi Region
- Furthermore, the EAP is to secure an Environmental Clearance Certificate (ECC) for Bush Camp which is required for the control and mitigation of potential environmental consequences that could be associated with the day-to-day operation of the tourism establishment
- To apply for the necessary licenses at the MAFWLR of water abstraction (borehole and surface water) and discharge of effluent

5. INFRASTRUCTURE

Bush Camp offers 4 unique exclusive campsites with a deck under a thatched roof (**Fig. 5**) and a swimming pool at the “Mad Max” deck (**Fig. 6**).

Accommodation and related facilities: *Bush Camp includes:*

- 4 exclusive campsites facing the Kwando River floodplains (**Fig. 4**)
- “Mad Max” deck with a swimming pool (**Fig. 6**)
- Borehole, 2x 5000 liter tanks and an adjacent workshop and storage (**Fig. 7**)
- Staff quarters and the solar power unit
- Black and grey water cement holding ponds prior discharge into a sand pit 100m distant from the channel

Bush Camp has been allocated an area of 43.3ha by the MAFWE TA (**pers. comm. Michiel Levin**), of which only about. 6ha is being utilized and includes campsites, staff quarters, deck, workshop, reception, roads, walkways and a borehole.

This implies that the **carbon footprint** on the elevated woodland landscape is minimal. Management ensures that the remaining portion of the allocated land is protected in such a manner that it provides the ideal habitat for birds and other wildlife.



Figure 5: Camp 1 at Bush Camp with thatched kitchen area (LHS) and ablution facilities (RHS) (E. Klingelhoefter).



Figure 6: “Mad Max”: view from the deck towards the Kwando River floodplains (E.Klingelhoefter).

6. ENVIRONMENTAL MANAGEMENT PLAN (EMP) and ENVIRONMENTAL CLEARANCE CERTIFICATES (ECC)

Currently there is no EMP in force and subsequently no ECC issued. It is for this reason that management of Losange Lodges has requested the EAP Klingelhoefter to develop an EMP as a requirement for the ECC. In addition, the EAP is to secure licenses for water abstraction and discharge of effluent from the Directorate of Water Affairs (MAFWLR).



Figure 7: The borehole at 80m depth and a capacity of 2 cubic meter (m³) per hour with 2x 5000-liter tanks (LHS) and carport & generator in the background (RHS) (E Klingelhoefter).

7. DISPOSAL STRATEGIES FOR SOLID WASTE and GREY/BLACK WATER EFFLUENT

Solid waste, i.e. 80%, is removed weekly from Bush Camp as follows:

- Solid waste (tins/paper/plastic/glass): on a weekly basis a member of the Mayuni Conservancy comes and collects all waste products which he then sorts and sells to recycling companies; waste residue is taken to the conservancy allocated dump site.

Grey/black water:

- All sewage is directed to concrete ponds of 10 sq meter which are emptied (sucked up) on a rotational basis as they reach a $\frac{3}{4}$ capacity and dispersed 350 m east of the channel into a sand pit (soak-away).

8. TOURISM STATUS IN THE ZAMBEZI REGION: KAZA TFCA

The vision for the KAZA TFCA is *‘to establish a world-class trans-frontier conservation area and tourism destination in the Okavango and Zambezi river-basin regions within the context of sustainable development’*.

The KAZA TFCA offers some of Africa’s best game viewing. This huge area, much of which is a vast and unique wilderness of savannas and endless rivers and marshes, is a safari connoisseur’s dream destination.

It is the will and ambition of the Proponent to build a formidable reputation that will continue to attract tourists from abroad to an eco-friendly environment and continue to support the Namibian economy and the adjacent local community.

9. ALLOCATION OF APP NUMBER

After having officially registered a request on portal (MEFT – DEA) for an ECC, the application was registered and the APP number allocated for the application of a new Clearance Certificate (ECC) was provided on 22 December 2025: i.e. **APP 251222-006838 (Doc 4)**.

10. INSTRUCTIONS FROM EC OFFICE

Following the receipt of the APP number, the EAP received clear instructions/verification from the EC office on 12 January 2026 (**Doc 5**), as to the official documents and reports which need to be submitted in both a soft and hard copy. The instructions provided by the EC office took the following into consideration:

- Location of the establishment
- Pollution potential (soil/water table)
- Scale of the operation of tourism offered

Instructions include:

- i) To compile an EMP outlining potential impacts and to provide mitigation
- ii) Confirmation of screening notice received in terms of assessment procedures (Section 35 (1) (a) (b) of the Environmental Management Act, No 7 of 2007)
- iii) Site map with coordinates (decimal degrees) and a legend
- iv) CV of the Environmental Assessment Practitioner (EAP)
- v) Declaration for the Submission of Assessment Reports and other support documents (upload Declaration Form)
- vi) Proof of written notice to any other organ of state having jurisdiction in respect of any aspect of the activity

In addition, the following reports and forms need to be completed and loaded onto portal:

- i) Formal application for ECC including stamp duties
- ii) Summary overview of Bush Camp facility

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- iii) BID – Background Information Document on Bush Camp
- iv) To compile a final report and to prepare 3 bound copies (MEFT EC office, the Proponent and the EAP)
- v) To load all information as per above requests onto the MEFT portal for final verification and review
- vi) To ensure that the water abstraction license (borehole and river) and an effluent discharge license, as prescribed by the MAFWLR, are secured

Table 3 provides a summary of Policies, Act and Regulations in place that the Proponent is required to comply with.

Table 3: Policy, Acts and Regulations that the Proponent needs to comply to for Bush Camp tourist operation.

No.	POLICY/ACT/REGULATION	ACTIVITY: CAUSE & EFFECT
1 2	<ul style="list-style-type: none"> EMP Act 2007 (Act No. 7 of 2007) Regulation 29 of 2012 (EMP) 	Day-to-day management of 4 campsites at Bush Camp
3 4	<ul style="list-style-type: none"> Water Resources Act of 2013 and Water Resources Regulation of 2023 	Water abstraction (borehole and surface water) and discharge of effluent
5 6	<ul style="list-style-type: none"> Forest Act 12 of 2001 Forest Regulation 2015 	Exotic invader plants and the removal of vegetation
7	<ul style="list-style-type: none"> Communal Land Reform Act of 2002 	Right of lease Agreement for Bush Camp
8	6th NDP & Vision 2030	Promote the tourism industry on Namibia
9	National Policy on Tourism of Namibia	Guidelines for tourism operation

11. PURPOSE OF THE BACKGROUND INFORMATION DOCUMENT (BID)

The purpose of the Background Information Document (BID), which was submitted as a separate report when applying for the APP number, was to provide a brief description of Losange Lodges (Pty) LTD and its 2 establishments viz. Camp Kwando and Bush Camp. Both establishments are operational and require separate EMPs for which Environmental Clearance Certificates (ECCs) are requested.

This BID, dated 15 December 2025, provides essential background information on:

- Application for APP number and location of Bush Camp
- The Proponent: company overview
- Environmental Assessment Practitioner: role and function
- Infrastructure and activities offered
- Operation of Bush Camp as a camping destination
- Tourism potential in the Zambezi Region
- The importance and necessity of an EMP for Bush Camp

12. EMP OBJECTIVES

The objective of this Environmental Management Plan (EMP) is to formulate measures which are to guide the Proponent and its staff in the execution of the EMP with focus on:

- Mitigate adverse impacts on various environmental abiotic and biotic components,
- Protect environmental resources where possible,
- Monitor day-to-day operations and to take appropriate action

Furthermore, this EMP is to assist management of Bush Camp (BC) to address its regulatory requirements in a systematic and cost-effective manner. A proactive approach can help BC to further reduce the risk of non-compliance and improve health and safety practices for employees and guests.

In summary the steps that the Proponent needs to follow and adhere to include:

Commitment, Planning, Implementation of EMP, Evaluation and Review

The National Solid Waste Management Strategy by MEFT (2018) was used as a guiding principle in this section of the report. A description of potential hazard waste and current mitigation practices in place, for Bush Camp, are listed in **Table 4**.

In addition, it is the objective of this new EMP to list and provide guidelines to the Proponent and operational manager in which sectors to improve, and to provide actions of mitigation, in order to comply with the Environmental Management Act of 2007. The EMP is a recognized tool that can provide the assurance that the Proponent is able to make suitable provisions for mitigation.

The aim at Bush Camp, regarding waste management of solids and grey/black water, is:

- to reduce (minimize/prevent) waste
- to recycle leftover foods and garden foliage (compost)
- to reduce the ecological carbon footprint at Bush Camp through “best practice management”

An EMP is the document that provides the Proponent with a description of the methods and procedures for mitigating and monitoring impacts. Furthermore, the EMP also contains environmental objectives and targets which the Proponent needs to achieve in order to reduce or eliminate the negative impacts.

This EMP document is to be seen as a living document which is to be used throughout the day-to-day operation of the establishment for which the ECC has been issued.

Government has a framework in place of legal policies, acts and regulations within which the tourism industry needs to comply, considering the potential negative environmental impacts the tourist operation could impact. **Table 3** provides a summary of Acts, Regulations and National Documents the Proponent needs to enforce.

SECTION 2: POTENTIAL ENVIRONMENTAL IMPACTS IDENTIFIED AND MITIGATION IN FORCE: in AUGUST and NOVEMBER 2025

Overview

Losange Lodges t/a Camp Kwando was issued with an ECC in 2017. Management assumed that this ECC would also cover Losange Lodges t/a Bush Camp which was to be established nearby. However, management became aware that they had defaulted to apply for a separate ECC in 2019 for Bush Camp. Dr Klingelhoefter recently was appointed to rectify the above non-compliance. The EAP, on his visits to Bush Camp in August and November 2025, tabulated all current activities identified (**Table 4**) and noted the potential environmental impacts and current mitigation in force.

In summary operational *cause and effect* identified, that may influence the environment, can be summed up into **3 main categories**:

Table 4 Part 1: Operational management

- Compliance - why an EMP
- Ongoing training for staff on the objectives of an EMP and its implementation
- Socio economic benefits: as per joint venture contract

Table 4 Part 2: Conservation related issues

- Protection of plants and wildlife on the 43.3ha landscape – promote biodiversity
- Minimize impacts on the water resources and use water sparingly
- Avoid soil and water pollution

Table 4 Part 3: Day-to-day activities

- Campsites
 - 4 exclusive sites each with a kitchen area, 220 volt electricity points and an ablution facility
 - the deck referred to as “Mad Max” bar with a pool
- Staff quarters and administration
 - manager and staff rooms
 - reception
- Workshop
 - generator as a backup; storeroom; car ports; work area (maintenance)
- Waste disposal sites
 - grey and black water; solids (glass, paper, plastic, tins)
- Environmental aesthetics
 - garden landscape (lawns, trees, pool); internal road network; solar panels and boreholes
- Tourism activities: mokoro trips, bird watching and fishing (catch and release)

Table 4: Current operational activities and their potential environmental impacts identified and mitigation in place as of August/November 2025.

Part 1: Operational Management

Objectives to be achieved	Impacts observed	Current Management Measures	Responsibility	Findings Mitigation in place
To ensure that an EMP is understood by the operational manager & his staff	Currently no EMP in force	Best management practices are being implemented to a degree	Proponent and operational manager of Bush Camp	Manager Anke S-L is aware of the EMP and acknowledges the importance of it. Furthermore, she has undertaken to ensure that this EMP report will be strictly followed & implemented
Proponent to comply to EMA Act of 2007 and Regulation 29 Of 2012	Roles and responsibilities of various staff members regarding EMP compliance not clearly spelt out However, indirectly issues relating to an EMP are being addressed	Staff not well acquainted regarding the necessity of the EMP report	Operational manager of Bush Camp	The roles of staff are assigned to specific person/s. The operational camp manager Mr. Roxy Tembwe was informed to assume responsibility for all activities that potentially may impact the environment e.g. solid waste (paper, plastic, tins, glass) and sewage (grey & black water), offroad driving etc
To ensure that the agreed socio-economic benefits of the JV contract are achieved	Bi-annual JMC meetings between operator and conservancy take place	JV contract is implemented	Proponent, Camp Kwando lodge managers, Bush Camp operational manager Conservancy committee, MEFT	JMC meetings held and benefits shared as per JV contract of 18 November 2019

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Table 4: Part 2 Conservation related issues

Objectives to be achieved	Potential Impacts observed	Current Management Measures	Responsibility	Findings Mitigation in place
Minimise impacts on vegetation	No negative impacts observed	Existing vegetation at Bush Camp is not removed	Operational manager Mr. Roxy Tembwe based at Bush Camp	Great care taken to protect the vegetation during operations and during maintenance of buildings. BC has been transformed to a sought-after camping destination for bird enthusiasts
	Agave and Jatropha exotic plant invaders were detected at reception	Introduced ornamental plants must only be indigenous to the area	Operational manager	No exotic plants are being introduced. The Agave and Jatropha are still remnants of the Mazambala Campsite pre-2018
	No damage to vegetation observed	Staff do not fell trees or damage vegetation	Operational manager	Firewood purchased by guests from the community at Kongola; staff only collect dead wood to kindle a fire for cooking
	Minimal tracks at Bush Camp constructed	Tracks at Bush Camp are confined	Operational manager	No new tracks developed to and from the campsites; no offroad driving allowed
Minimise impact on wildlife	No incidences to date recorded of wildlife being injured or killed	Ensure that guests are aware of the potential danger of wild animals entering Bush Camp at night	Operational manager	All guests are briefed upon arrival of the presence and dangers of wild animals.
	None	Staff do not have an impact on wildlife e.g. hippo, elephants and crocodile at the Kwando River	Operational manager	The manager and staff are aware of the implications of illegal activities relating to wildlife.

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Objectives to be achieved	Potential Impacts observed	Current Management Measures	Responsibility	Findings Mitigation in place
Minimise land degradation & erosion	None detected	The terrain is well maintained	Operational manager	Guests are informed on arrival offroad driving is not permitted nor vegetation to be removed
Minimise impact on water abstraction: from the Kwando River (channel) and borehole	<u>Limited water</u> is taken from the Kwando River; water use mainly from the borehole	Staff are aware of the need not to use water wastefully	Operational manager	Staff receive on-going awareness of the need to use water wisely
	Borehole depth is 80m Potential impacts: Over-usage Leaking pipes Noise factor	Water usage and consumption is within the “best practice guidelines”	Operational manager	Capacity of 2 cubes/hour Licenses from GRN Water Affairs (MAFWLR) for the borehole and surface water abstraction will be applied by the EAP Holding tanks only filled during the day
Minimise soil & water pollution	Potential petrol and oil spillage on land (none); back-up generator not in use	Spillages of potentially harmful substances are cleared immediately	Operational manager	No spillages to date but manager was made aware of the need to monitor regularly, in case fuel and oils are brought to Bush Camp. Only accredited containers to be used
	Possible leakage and overflow of cement holding ponds especially during rainy season	Sewage pumped to sand pit once near capacity	Operational manager	Cement ponds emptied and discharged 350+ m from the Kwando River channel into a sand pit.
	Potential harmful soaps can contaminate both water and the soil micro- and macro-organisms	Use of environmentally friendly soaps and detergents	Operational manager	Both the staff and guests to be made aware that bio-degradable soaps are to be used

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			TABLE 4:	PART 3: DAY-TO-DAY	ACTIVITIES	
No.	ACTIVITY	WASTE TYPE	DESCRIPTION	STRATEGY IN PLACE	IMPACT +/-	MITIGATION
1	<p>At each of the 4 campsites is a: kitchen, shower, toilet</p> <p><u>Note:</u> Campsites 1&2 and 3&4 have their own storage facility for the grey/black water located 100m east of the ablution block</p> <p>The wastewater is fed into a rectangular open cement pond with a capacity of about 5000 liter</p>	Grey water	<p>Washing of dishes, pots and pans at field kitchen</p> <p>Shower and wash basin at ablution block</p>	Fed to the 5000 liter cement pond east of the channel of the Kwando River	<p>Low to medium</p> <p>No seepage to Kwando River</p> <p>No soak-away pits on site</p>	<p>40mm drainpipes in place; check daily for leakage</p> <p>Emptied whenever $\frac{3}{4}$ full; discarded 350 m from Bush Camp away from the river into a sand pit</p>
		Black water	Male/female toilets for guests and staff	Sucked up once $\frac{3}{4}$ full and discharged approx. 350 m of Bush Camp into a sand pit	<p>Low to medium</p> <p>No seepage directly to Kwando River;</p> <p>Soak-away sand pits in at least 350m distant from the river channel</p>	<p>110mm pipe directly to the cement pond storage facility;</p> <p>No bio-enzymes added to facilitate in breakdown of solids;</p> <p>Emptied whenever $\frac{3}{4}$ full; discarded about 350m from Bush Camp away from the river into a sand pit.</p>
		Solids	Glass, paper, plastic wrappings, tins, and cans	80% solid waste is stored and removed from BC on a weekly basis	Low	Solids are all collected for recycling and the residue (paper and plastics) burnt on site
		Organic	Food leftovers, peels, tea bags, etc.	Compost beneficial for plants	Insignificant	Clear separation and used for garden compost

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No.	ACTIVITY	WASTE TYPE	DESCRIPTION	STRATEGY IN PLACE	IMPACT +/-	MITIGATION
2	Accommodation At the staff quarters: a similar system is in place as the above	Grey water	Kitchen, shower and washbasin water	Fed to the 5000 liter cement pond east of the channel of the Kwando River	Low to medium	40mm drainpipes in place; check daily for leakage Emptied whenever $\frac{3}{4}$ full; discarded 350 m from Bush Camp away from the river into a sand pit
		Black water	Toilets	Directed to the cement pond; sucked up once $\frac{3}{4}$ full and discharged approx. 350 m of Bush Camp into a sand pit	Low to medium	110mm pipe directly to the cement pond storage facility; No bio-enzymes added to facilitate in breakdown of solids
		Solids	Tins, plastic, paper, glass	All items are collected and stored for collection on a weekly basis	Low	80% removal of solids on a weekly basis from Bush Camp; the residue of paper and plastic burnt in a sand pit on site.
3	Mad Max deck: pool and toilets	Grey water	Pool cleaner to kill algae	Only Borehole water used for the pool	Low	1x per month the pool is cleaned and refilled
		Black water	One male and one female toilet	Effluent waste directly to a French drain soak-away system Fig. 10	Medium	Soak-away system used; need to be rectified due to its proximity to the channel

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No.	ACTIVITY	WASTE TYPE	DESCRIPTION	STRATEGY IN PLACE	IMPACT +/-	MITIGATION
4a	Water abstraction facility Groundwater: Borehole	Potential noise factor from pumps	Borehole (80m depth) out of view from guests	To avoid wastage from leaks, abstraction pipe is checked daily	Low	Training to staff and guests on why to use water sparingly is an ongoing activity License application with MAFWLR in process i.e. Form WA04-GW
4b	Water abstraction facility Groundwater: Borehole	Water usage in excess in dry season	Pool at Mad max deck	During the cold winter season, the pool is not operational	Low	License application with MAFWLR in process i.e. Form WA04-GW
5	Storeroom safety (petrol, chemicals, paint, lubricant oil, backup generator)	Hazardous	Generator not used; No boat trips from Bush Camp; Therefore, no oils and petrol on site;	None	None	Storeroom is well secured and locked at all times to store garden and maintenance implements
		Solids	Empty cans and tins	Collected for recycling	Low	On a weekly basis all solids are collected and sent for recycling
6	Sorting and storing area for solid waste	Solids	Glass, paper, plastic wrappings, tins	Dedicated designated area adjacent to staff quarters prior collection	Medium	Visual impact not pleasing; the area (15sq.m) to be fenced with a gate; fence to be covered with reeds or shade net.

SECTION 3: NEW ENVIRONMENTAL MANAGEMENT PLAN (EMP) for 2026-2028

IMPACTS IDENTIFIED and RECOMMENDED MITIGATION of SOLID WASTE and GREY & BLACK WATER EFFLUENT DISCHARGE

Legal framework and policy

A tourism operation is a listed activity that may have a significant impact on the environment, and which consequently requires authorization from the relevant environmental authorities (**Table 2 & Table 3**). The Regulations 29 Activity 6, further specify the assessment process and the information that is required to enable DEA (MEFT) to take a decision regarding the activity.

The Ministry of Environment, Forestry and Tourism (MEFT) in this case, requires that an EMP is to be submitted i.e. to identify current potential impacts and to provide recommendations that will mitigate potential environmental impacts.

The following documents were consulted which have relevance on the EMP submitted in this report:

- i) Environmental Management Act (EMA), No 7 of 2007
- ii) Environmental Management Act (EIA Regulation), GG No 30 of 2012
- iii) Guide of 2008 to the EMA No 7 of 2007, MEFT
- iv) National Solid Waste Management Strategy (MEFT), 2018
- v) Visits to Bush Camp by the EAP in August and November 2025
- vi) Water Resource Act of 2013 and Regulations of 2023

Furthermore, this report responds to the instructions received from the EC office to ensure that the activities at Bush Camp comply with provision of the EMA of 2007 and its Regulations of 2012. In addition to the compliance of policies and legislation, Bush Camp operational manager Mr. Roxy Tembwe is committed to ensuring that the best practices in managing the environment and to mitigate the impacts are adhered to.

Major improvements made at Bush Camp since the signing of the JV with the Mayuni Conservancy include:

- The existing Mazambala campsites have been transformed into 4 exclusive campsites, each with a kitchen facility under a thatched roof and an ablution with separate shower and toilet
- Each campsite occupies a surface area of approximately 2500 sq meter
- Solid waste (80%) left by guests is collected weekly by a member of the Mayuni Conservancy who sorts items for further processing; the residue of paper and plastic is burnt on site in a sand pit
- Upgrade of the gardens
- Demolish unusable defunct buildings left by previous JV at Mazambala Campsite

Potential Impacts at Bush Camp

Any action taken be it road infrastructure, mining, agriculture, fishing, including tourism establishments, has a reaction. The challenge is on how *to reduce* and *to minimize potential impacts* brought about by development and in this case the day-to-day operation of Bush Camp on the eastern banks of the Kwando River.

During the two visits by the EAP and his team to Bush Camp the following observations were made:

- That the Proponent is committed to accommodate best ecological management practices and to showcase the camp as an eco-friendly tourism destination.
- Main sources of impacts on the environment arise from:
 - Grey water (shower, wash basin, kitchen sink)
 - Black water (staff and guest toilets)
 - Solids (plastic, paper, glass, tins)
 - Organic waste (food leftovers and garden refuse)
 - Other (fuel, paint, building rubble)

Bush Camp, which is situated on the eastern bank of a channel of the Kwando River, within the Mayuni Conservancy, has its challenges regarding waste disposal. In an area next to the staff quarters (out of site from guests), all solids are stored prior pick-up. However, it is to be noted that on a weekly basis 80% of solid waste is removed by a member of the Mayuni Conservancy e.g. tins for recycling (**Fig. 8 LHS**) and the residue taken to the official dump site within the Mayuni Conservancy. Paper and plastic are burnt in a sand pit on site (**Fig. 8 RHS**).

It is recommended that the designated area of approximately 15m² for storage of the solid waste, be entirely fenced off and fitted with a gate. The current storage facility is located next to the staff quarters accessible to rodents, carnivores and primates causing an unpleasant environmental situation.

Waste types, their potential impacts and mitigation in place (Table 5)

Bush Camp can be referred to as a low impact operation which can cater for a maximum of 4 guests per campsite per day, however, due to its proximity to the Kwando River wetland ecosystem a detailed EMP needs to be in place.

The potential impacts identified in August and November 2025 are linked to the day-to-day operation of the tourism establishment. A qualitative approach was taken to assess the current management practices regarding waste disposal i.e. to identify and to understand the complex phenomena of waste collection and disposal through on-site visits by the EAP, in-depth open-

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ended data collection, interviews with Camp Kwando managers and the operational manager of Bush Camp and the analysis thereof.

The approach taken was to list and tabulate “**Type of Activity**”; “**Potential and severity of Impacts**”, “**Current mitigation in place**” and “**Gaps identified**”.

The **New recommended EMP** has been presented in **Table 5: Impacts, Action (who responsible) and Mitigating protocols recommended** are based on findings made by the EAP:

In summary the following main activities/infrastructure were identified:

- i) Campsites: 4x with kitchen, braai area and ablution facility
- ii) Deck which is referred to as Mad Max with a pool and 2 toilets
- iii) Administration: reception/office
- iv) Accommodation: staff quarters
- v) Storeroom safety: generator and garden implement
- vi) Site for sorting and storage of solid waste prior to collection
- vii) Grey and black water disposal rectangular cement holding ponds

Current waste protocol in place at Bush Camp

- Grey and black water from campsites and staff quarters feed into rectangular 1,5m deep cement ponds prior to discharge to a sandpit (soak-away) (**Fig. 9**)
 - Campsites 1 & 2: effluent discharge fed to a cement pond
 - Campsites 3 & 4: effluent discharge fed to a cement pond
 - Staff quarters: discharge fed to a cement pond
 - Mad Max deck toilets feed directly into a French drain soak-away (**Fig 10**)
- Solid refuse (plastic, paper, glass, containers) are stored out of sight from guests and removed weekly from BC

Bush Camp can be referred to as an eco-friendly lodge which strives to:

- Maintain low key impact waste generated
- Protocols are in place to reduce, reuse and recycle solid waste generated
- Overall best practice procedures are followed



Figure 8: Site where solid waste is stored prior to burning and disposal.

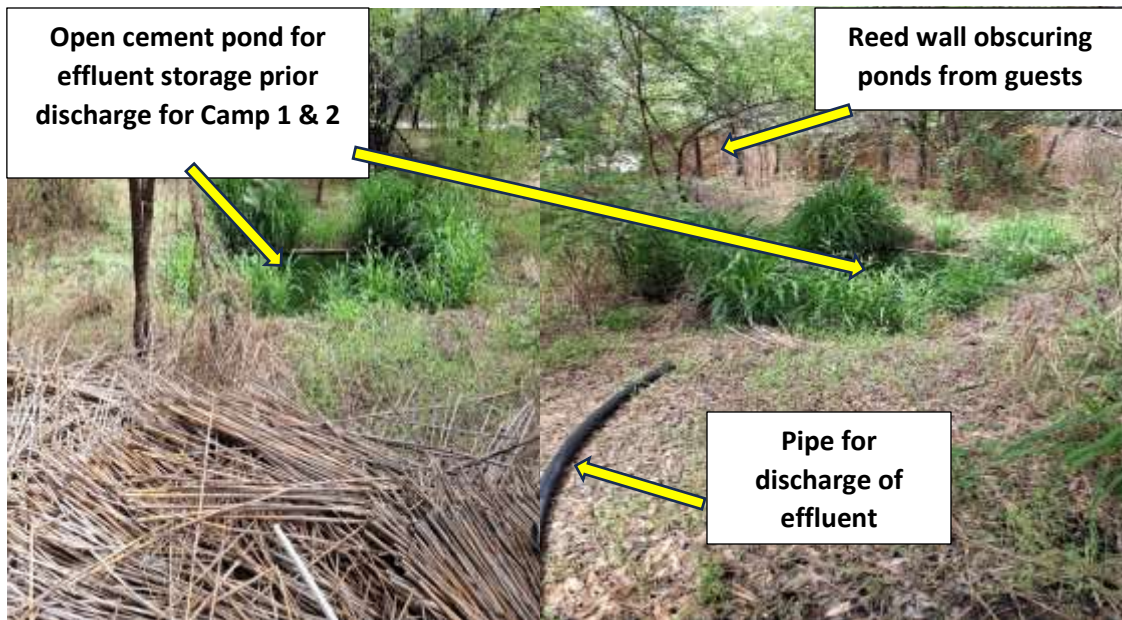


Figure 9: Collector cement ponds for grey and black water prior to discharge to a sand pit 350m away from the Kwando River.



Figure 10: Male and female toilets next to Mad Max deck.

Figure 11: Exotic plants at reception: from Mexico: Agave & Jatropha.

Mitigating solid waste, grey and black water disposal

Due to the type and nature of the business, Bush Camp operation strives to be in line with the best tourism industry practice. Mitigation measures are key to the operation of Bush Camp and need to be revised from time to time, i.e. to minimize the environmental effects at the specific location adjacent to a channel on the eastern bank of the Kwando River. It is for this reason that the existing potential environmental impacts identified have been presented in **Table 5** and recommended mitigation provided.

Bush Camp is a tourism-based business venture that impacts on the environment in one way or another, that calls for consideration of different alternatives to:

- reduce the risks to both the environment and public health
- promote staff and community awareness on strategies to be considered and implemented in the “waste minimization”

In this Environmental Management Plan (EMP), the mitigation principles focus on:

- avoiding, minimizing, and/or compensating for negative environmental impacts arising from an activity, through measures like reducing pollution, conserving resources, and restoring ecosystems.

A list of *actions* that are *recommended* to ensure *mitigation* of potential environmental impacts are provided in **Table 5**. The objective of this EMP is to re-emphasize the key action verbs applicable at every tourism establishment operating in Namibia, viz: **to reduce (minimize), to reuse and to recycle** solid waste.

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**Table 5: Action (who responsible) and mitigating protocols recommended based on findings
August & November 2025**

`No.	ACTIVITY	POTENTIAL IMPACTS TAKEN NOTE OF	WHO RESPONSIBLE	MITIGATION-ACTION RECOMMENDED
1	Bush Camp strives to comply to the EMA ACT of 2007 and Regulation 29 o 2012	<p>No EMP in force to guide management on the day-to-day operation.</p> <p>However, it was observed that management strives to follow and ensure that Bush Camp is run and managed on eco-enviro principles</p>	Proponent and management at Kamp Kwando and operational manager at Bush Camp	<p>Manager Anke S-L is aware of the importance of an EMP and acknowledges the necessity of compliance. Furthermore, she has undertaken to ensure that this EMP report will be strictly followed and implemented. It is recommended that:</p> <p>i) a bound copy of the EMP be kept in the office at Bush Camp</p> <p>ii) the EMP to be consulted weekly and form an integral part of management</p> <p>iii) staff to receive ongoing training in the objectives and importance of the EMP, service delivery, hygiene, the recycle and reuse concept</p> <p>iv) all open sewage ponds to be checked daily to determine capacity</p> <p>iv) designated refuse storage area adjacent to staff quarters to be entirely fenced off</p>
2	Socio-economic benefits of the JV contract are achieved and bi-annual JMC meetings attended	Bi-annual JMC meetings between operator and conservancy do take place	Proponent and Management	<p>To prioritize JMC meetings held and benefits shared as per JV contract</p> <p>Outcomes of meeting to be summarized in the bi-annual reports to MEFT EC office</p>

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No.	ACTIVITY	POTENTIAL IMPACTS TAKEN NOTE OF	WHO RESPONSIBLE	MITIGATION-ACTION RECOMMENDED
3	Achieve compliance regarding Employment Equity Commission (EEC)	To ensure that Bush Camp complies with ECC policy and labour issues are prevented	Proponent and management	Management is to be complimented on the socio-economic benefits provided to their staff and complying with the Affirmative Action (Employment) Act of 1988
4	Minimize negative impacts on the vegetation	Water abstraction from the Kwando River channel during dry periods for the deck pool at Mad Max No removal of bush or trees was observed Exotic trees/shrubs can compete with indigenous trees e.g. refer to Fig. 10 Accumulation of organic litter of leaves, twigs, branches over time could be unpleasing	Operational manager and staff	Litter (leaves, twigs, branches) to a designated compost next to the vegetable garden. Only to plant indigenous trees and shrubs that occur naturally in the Mayuni Conservancy and that are adapted to the climate. The exotic plants at reception i.e. Agave and Jatropha are to be removed over time.
5	Minimize negative impacts on wildlife	Guests made aware of the potential danger of wild animals entering Bush Camp at night Feeding of vervet monkeys by guests to be forbidden	Operational manager and staff	All guests are briefed upon arrival of the presence and dangers of wild animals. The manager and staff are aware of the implications of illegal activities relating to wildlife.
6	Ensure care and respect to the environment is always achieved	Potential disturbance of wildlife during mokoro trips on the Kwando River channel	Operational manager	Ongoing training of mokoro guides e.g. safety of guests and to keep safety distance to wildlife.

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No.	ACTIVITY	POTENTIAL IMPACTS	WHO RESPONSIBLE	MITIGATION-ACTION RECOMMENDED
7	Minimize land degradation (erosion)	Road network to Bush Camp and internal roads Lead to potential erosion and land degradation Excessive vehicle traffic, new roads and potholes	Operational manager at Bush Camp	No new roads to be initiated without the consent of MEFT Potholes to be filled with building rubble
8	Minimize impacts on water abstraction from the Borehole	From the Kwando River Aesthetics of pump station in Kwando River Noise pollution Excess abstraction	Operational Manager at Bush Camp	i) Ensure that pump system is protected at all times from wildlife (hippo, crocodile, elephant) ii) Operate pumps only during daylight hours iii) To acquire Abstraction License for surface water from Ministry of Agriculture, Water & Land Reform (Form No. WA03-SW) iv) To install a water logger meter
		From the borehole Increase in water abstraction during dry periods From the Kwando River channel No surface water abstraction takes place	Operational manager at Bush Camp	i) Operate pumps only during daylight hours (noise factor) ii) Water flow to reservoir tanks to be switched off timely when full capacity to prevent wastage iii) To acquire Borehole License from Ministry of Agriculture, Water & Land Reform (Form No. WA04-GW) – in process
9	Minimize soil and water pollution (storeroom, discharge effluent, pool at deck)	Potential spillage of liquid chemicals; leakage of containers at storeroom possible leakage and overflow at open cement ponds of effluent	Operational manager at Bush Camp	No spillages recorded to date; ongoing training to staff recommended on safety precautions; effluent cement ponds to be emptied on a rotational basis and emptied once $\frac{3}{4}$ capacity; to be fenced in and covered; only certified containers to be used for chemical storage

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No.	ACTIVITY	POTENTIAL IMPACTS OBSERVED	WHO RESPONSIBLE	MITIGATION-ACTION RECOMMENDED
10	<p>Accommodation (4 self-catering campsites and staff quarters)</p> <p>Mad Max Deck pool and toilets</p>	<p>Accommodation: i) Solids (paper, tins, glass and plastics) not sorted and well stored prior dispatch ii) Soap and detergents in case of spillage or leakage harmful to micro-organisms in the soil iii) In case of cement ponds for effluent overflow blocked a foul smell and seepage into the sandy soil a possibility iv) Pollute the unique environment if not contained (aesthetics/wildlife)</p> <p>Mad Max Deck i) Current direct soak-away system from toilets not permitted ii) Not in place wildlife proof trash bin iii) Chemicals added to pool can pollute underground water and the soil during discharge</p>	<p>Proponent and the operational manager</p>	<p>Accommodation: i) Only bio-degradable soaps to be used by staff and guest to be encouraged to do so; notice to be placed at ablution block ii) Gardeners and security to report leakage iii) To ensure that all solids are well stored at designated refuse storage site iv) The current cement ponds once covered and fenced off can remain, however at each of the 4 campsites and staff quarters a 1000 liter digester septic tank to be installed which is fed with enzyme digesters weekly</p> <p>At Mad Max deck the following recommendations are made: i) A 1000 liter capacity septic tank digester to be installed next to toilet; weekly enzyme digester to be added; overflow to soak-away then possible ii) Wildlife proof trash bin to be installed iii) Bio-degradable chemicals only to be added to the pool</p> <p>Note: The function of the 1000 liter septic digester tanks are to ensure that prior effluent discharge solids are broken down</p> <p>Note: License application for the Discharge of Effluent W07 with MAFWLR in process</p>

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No.	ACTIVITY	POTENTIAL IMPACTS OBSERVED	WHO RESPONSIBLE	MITIGATION-ACTION & RECOMMENDATIONS
11	Sorting and storing area for solid waste	<p>Site for glass, paper, plastic and tins stored for collection/burning – currently not safe – wildlife have access to the area</p> <p>Only tins and glass are currently sorted</p> <p>Potential attraction to wild animals (rodents, carnivores, primates)</p> <p>Eyesore (Fig. 7) and danger to animals (plastics) if trash is not safely confined</p>	Operational manager	<p>Recommend that solids such as tins, glass and cardboard should go to recycling depot (Sijwa Project) where recycling is carried out (ca 20km south of Bush Camp) where the trash is converted to treasure</p> <p>i) Bins for sorting solids to be placed at specified site at staff quarters ii) storage of solid waste to be fenced with a gate that can be locked; fence to be covered with shade net (aesthetics); area max of 15sq meter; iii) weekly collection of all solids by a member of Mayuni Conservancy is ongoing</p>
12	Maintenance of buildings (rubble and discarded building material)	Building rubble (left-over trash from building)	Operational manager	<p>i) Rubble to be used to fix access and internal roads (2,6km) from the B8– an ongoing activity</p> <p>ii) remainder of discarded building material to be stored for collection</p> <p>iii) Need to tidy up staff quarters and site for solid waste storage</p>

Solid waste management at Bush Camp

It is to be mentioned that 80% of solid waste accumulated at Bush Camp is removed from the site on a weekly basis by a member of the Mayuni Conservancy. The residue of paper, hardboard and plastics are burnt in a pit on site.

This implies that NO solid waste is deposited in a landfill at the establishment which makes it one of the few tourist destinations that ensures that Bush Camp does not become a dumping site over time. In **Table 5**, action points are listed to ensure that mitigation is maintained at all times.

Summary of Key Points raised in Table 5 that require further attention

An update on progress made on points raised below shall be presented in the bi-annual EMP report as per requirement of the EC office of MEFT: Section C Points 6 and Point 14.

1. The **EMP is a living document**: this report must be filed at the operational manager's office and always be available to be consulted.
2. It is essential that **ongoing staff training** is provided by the Camp Kwando management to Bush Camp staff on the importance and necessity of this EMP. All team members to be made aware of compliance.
3. The current **storage area for waste solids to be fenced** off to ensure that the area is safe from primates and rodents.
4. **Specific bins** for glass, plastic, paper, tins to be placed at each camp site and at the deck, staff quarters and reception. Bins to be taken to the solid storage area daily where similar bins are to be in place.
5. Management to continue to ensure that they maintain **good standing with EEC** regarding labour issues.
6. **Water abstraction** (ground water and surface water) and discharge of effluent: need to apply for licenses at the Ministry of Agriculture, Water and Land Reform; the process has been initiated by the EAP for water abstraction and effluent discharge.
7. **The removal of exotic plant invaders** is recommended that can negatively impact the Kwando wetland ecosystem.
8. The **current discharge of effluent** as per the Water Resource Act and Regulation (2013 and 2023), does not comply and need to be rectified.

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In accordance with section 37(2) of the Environmental Management Act, Act 7 of 2007 and Environmental Impact Assessment Regulation of 2012 (GG 4878) an ECC can be issued by the EC based on the EMP submitted. The Proponent is advised to comply with the conditions of approval as set out in Section C Points 1-17 after receiving of the ECC.

Point 6: “The Proponent shall appoint a suitable experienced environmental control officer, or site agent where appropriate, before the commencement of any listed activities to ensure compliance with the conditions of approval and mitigation stipulated in the approved EMP”.

Point 14: “The Proponent is required, from the date of commencing implementation of project activities, to compile and submit environmental monitoring reports (on project progress and the environmental management profile) on a bi-annual basis to the Office of the Environmental Commissioner”.

SECTION 4: RECOMMENDATIONS AND CONCLUSION

The Management of Bush Camp is determined to take appropriate action to deliver sustainable and safe waste management that minimizes environmental impact on fauna and flora and which in turn will support the socio-economic viability of the local community of the Mayuni Conservancy.

The Proponent is complimented on the current efforts in place to mitigate waste disposal and was requested to continue to strive and to maintain “best practices” regarding waste management, namely to:

- **avoid, minimize or remedy adverse impacts to the environment i.e. to find better alternatives and ways of doing things**
- **enhance the environmental and social benefits**
- **ensure that residual adverse impacts are kept within acceptable levels**

The operational manager of Bush Camp has recognized the urgent need to improve their solid waste storage location, which is located adjacent to the staff quarters out of sight of tourists. It is recommended that the Proponent make the following activities a priority:

- to fence off an area (15 square meters) used for solid waste storage and to have each waste type separated into containers ready for collection (the area to be vervet monkey proof)
- continue to investigate strategies to be considered and implemented in “waste minimization”
- always reduce the risks to both the environment and public health

In addition, this EMP outlines the roles and responsibilities of the Proponent and management, to ensure that the best environmental management practices are in place.

**ENVIRONMENTAL MANAGEMENT PLAN (EMP) for Losange Lodges (Pty) LTD t/a BUSH CAMP
APP 251222-006838**

It is to be re-emphasized that *Bush Camp is a small tourist operation with only 4 campsites* which caters for a maximum of 16 guests per day during peak season. Overall, the environmental impact can be rated as low. Management has in place procedures which focus on safeguarding adverse environmental impacts to both the abiotic and biotic environment. It is the mission of Bush Camp to continue to promote its 4 campsites as an environmentally eco-friendly destination.

In conclusion

The unique location of Bush Camp, which is positioned in the heart of KAZA TFCA, is contributing to the following entities:

- Promoting and operating an effective and efficient tourism niche
- Contribution to Namibia's GDP
- Positive upliftment to the socio-economic structure of Mayuni Conservancy
- Contribution to livelihoods of people through job creation
- Stimulate, attract and encourage tourism in the KAZA TFCA and provide guests with the best wildlife experience ever.

There is a current trend in Namibia where people seek for remote places with limited infrastructure which Bush Camp offers. The Proponent is encouraged to keep the 4 campsites which blend into the environment as they are. Upgrades are not recommended.

Furthermore, it is to be mentioned that management informed the EAP that this EMP will be adopted and implemented to ensure that the EMP is well understood by all staff.

Policies, procedures and practices are available to the Proponent that can assist in managing and reducing the impact of waste on the immediate environment. It is the responsibility of the Proponent to continue to identify, evaluate and mitigate environmental impacts.

In conclusion, management is encouraged to aim to: reduce (avoid/minimize), reuse and recycle waste where and whenever possible, which Bush Camp currently strives to ensure that their 4 campsites are rated and known for its environmental eco-friendly operation on the eastern banks of the Kwando River where the carbon footprint is negligible.

References

- i) Environmental Management Act (EMA), No 7 of 2007
- ii) Environmental Management Act (EIA Regulation), GG No 30 of 2012
- iii) The 2008 Guide to EMA No 7 of 2007, MEFT
- iv) Google maps (2025)
- v) National Solid Waste Management Strategy (MEFT), 2018
- vi) Water Act and Regulation of 2013 and 2023
- vii) Contract: JV between the Mayuni Conservancy and Losange Lodges (Pty) LTD t/a Bush Camp, November 2018

Note: AI was not used to compiling nor to generate both the BID and EMP reports.

RELEVANT DOCUMENTS 1 - 7 AS PER EC REQUEST

Document 1: Memorandum of Agreement of a JV between the Mayuni Conservancy and Losange Lodges (Pty) Ltd 18 August 2018: Summary

MEMORANDUM OF AGREEMENT FOR THE PROPOSAL FOR THE RE-
DEVELOPMENT, UPGRADING AND OPERATING OF MAZAMBALA PREMESIS IN
THE MAYUNI CONSERVANCY

Made and entered into by and between

THE MAYUNI CONSERVANCY

Herein represented by Geoffrey Tukahupwile

he warranting to be duly authorised thereto.

(hereinafter referred to as the "Conservancy")

And

LOSANGE LODGES (PTY) LTD

t/a BUSCH CAMP

Herein represented by BARENGERE GAUTIER

(hereinafter referred to as the "Operator")

DATE: 18 Nov. 2018

**ENVIRONMENTAL MANAGEMENT PLAN (EMP) for Losange Lodges (Pty) LTD t/a BUSH CAMP
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notice from one party to the other with effect from the date of receipt by the latter of such notice.

THE CONSERVANCY: MAYUM CONSERVANCY
THE OPERATOR: Losange Lodges (Pty) LTD

9. WARRANT OF AUTHORITY

The persons signing this agreement on behalf of the parties expressly warrants their authority to do so.

Thus done and signed at BUSH CAMP on this the 18 day
AUGUST 2018

WITNESSES:

1. [Signature]
2. SSK

[Signature]
FOR CONSERVANCY

Thus done and signed at BUSH CAMP on this the 18 day
AUGUST 2018

WITNESSES:

1. [Signature]
2. [Signature]

[Signature]
FOR OPERATOR

Document 2: Appointment letter of EAP Dr E Klingelhoefter



**The Environmental Commissioner
Mr Timothy Mufeti
Ministry of Environment and Tourism
Private bag 13306
WINDHOEK**

**REQUEST for the RENEWAL of ENVIRONMENTAL CLEARANCE CERTIFICATE
for the operation of
CAMP KWANDO, ZAMBEZI REGION**

**APPOINTMENT OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER (EAP)
Dr Ekkehard Klingelhoefter**

Dear EC Dr. T Mufeti,

Date: 4 August 2025

I make reference to the letter from the then Environmental Commissioner (EC) Mr. T. Nghitila, dated 20th September 2017 (find attached). This is to inform your kind office, that Camp Kwando was closed for an extended period due to COVID 19 during 2021 to 2022 and only has commenced with operation as of January 2023. During the past years management has embarked on the following activities:

- extensive maintenance of the buildings
- upgrade of the solar power unit
- upgrade of the waste management protocols
- implement extensive marketing strategies to attract clients
- at the discontinued camp sites, established additional accommodation

Project Name: Operation of CAMP KWANDO, Zambezi Region

Nature of Activity: Operating CAMP KWANDO on the eastern bank of Kwando River adjacent to Bwabwata National Park.

For Camp Kwando to be accredited as an operating lodge as prescribed by the Environmental Management Act No. 7 of 2007, we are aware that our Environmental Clearance Certificate to operate as a lodge needs to be reviewed every three years.

We hereby wish to inform your kind office that I have appointed Dr. Ekkehard Klingelhoefter, of Atlantic Consulting Services CC/ 2021/03824 as the Environmental Assessment Practitioner (EAP), to assist my company to be re-issued an Environmental Clearance Certificate. His task will be as follows:

1. To ensure that the Environmental Management Plan is updated and implemented
2. To ensure that a rigorous Waste Management Protocol is in place

Dr Klingelhoefter will be provided with a copy of the existing EMP and the current ECC including any additional documents relevant to the EMP that the EAP requires to update our current EMP.

PO Box 606 | Kongola | Namibia
Tel +264 66 686 021 | Fax +264 66 686 020 | Mobile +264 81 358 2200 | Skype +49 22 548 3024
General enquiries: info@campkwando.com | Web: www.campkwando.com
Bookings/reservations: bookings@campkwando.com or +264 66 661-677



Animal and Ecosystem Health Consultant
DR EKKEHARD KLINGELHOEFFER
☎ 081 719 3939
✉ ekkehardwk@gmail.com
📦 P.O. Box 594 Swakopmund

ENVIRONMENTAL MANAGEMENT PLAN (EMP) for Losange Lodges (Pty) LTD t/a BUSH CAMP
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Please let me know if there is any additional information that is required by your kind office to ensure that our Environmental Clearance Certificate can be re-issued for a period of 3 years.

Yours sincerely,

Mrs. Anke Levin (Manageress)

Email: info@campkwando.com

Cell no: 081- 815 3440

Mr. Michiel Levin (Manager)

Email: info@campkwando.com

Cell no: 081- 815 3440

P.O. Box 8016 | Kangola | Namibia
Tel: +264 66 666 001 | Fax: +264 66 666 003 | Mobile: +264 81 358 2280 | Skype: +41 22 546 3604
General enquiries: info@campkwando.com | Web: www.campkwando.com
Bookings/reservations: bookings@campkwando.com or +264 64 451 627

**Document 3: Carbon Footprint at Camp Kwando and Bush Camp, Mayuni
Conservancy, 1 September 2025**

Dear Mrs. and Mr. Levin,

1 September 2025

Subject: REQUEST for one (1) EMP for CAMP KWANDO and BUSH CAMP

Our discussions, pertaining to the above, have reference to the Environmental Clearance Certificate/s (ECC) to be issued to CAMP KWANDO (Lodge and Bush Camp).

My correspondence and WhatsApp with the Environmental Commissioner (EC) and his staff, refers. The outcome/feedback is as follows:

- Both hospitality establishments have a different “carbon footprint” i.e. Camp Kwando and Bush Camp are located at a different water mass distant from each other (Fig. 1 below)
- It is for this reason that two EMPs are to be submitted i.e. for each hospitality establishment

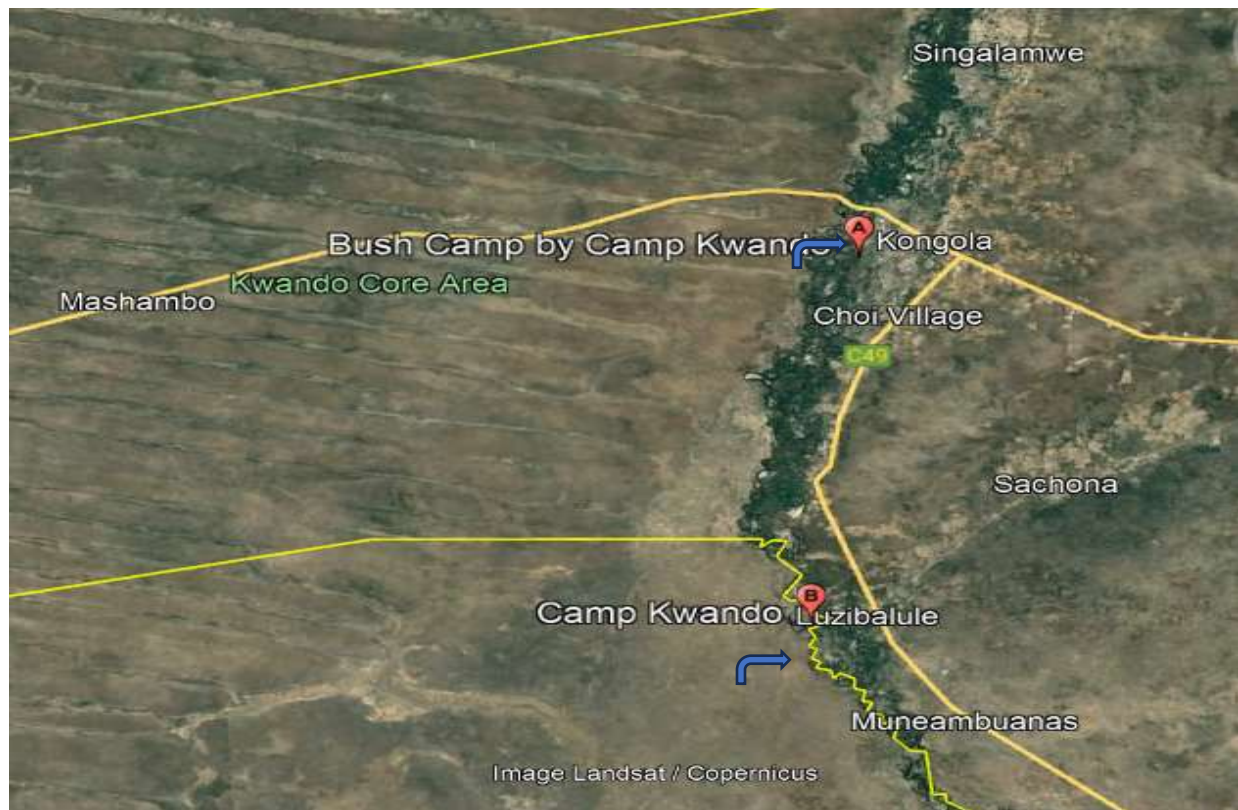
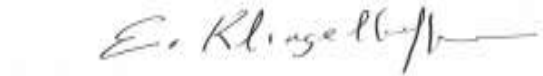


Figure 1: Both hospitality operations viz. Camp Kwando and Bush Camp, with a different “carbon footprint”, approximately 35km apart, Zambezi Region.

**ENVIRONMENTAL MANAGEMENT PLAN (EMP) for Losange Lodges (Pty) LTD t/a BUSH CAMP
APP 251222-006838**

This implies that 2 separate submissions (EMPs) are to be made to the EC office requesting per “carbon footprint” an Environmental Clearance Certificate (ECC). Please let me know whether I should include Bush Camp in the consultancy, as this will have additional costs.

Yours sincerely,



Dr. Ekkehard Klingelhoef: Environmental Assessment Practitioner (EAP)

Document 4: APP number allocation from EC office (22 December 2025)

New application for an Environmental Clearance Certificate

Ministry of Environment and Tourism

Mon 22 Dec, 20:28 (8
hours ago)



REPUBLIC OF NAMIBIA
Ministry of Environment, Forestry & Tourism

2025-12-22

Dear Ekkehard Klingelhoefter,

Thank you for applying for an Environmental Clearance Certificate (ECC) for
Losange Lodges t/a Bush Camp.

Your application has been registered with application number **APP 251222
006838**

Thank you

Phillip Troskie Building
P/Bag 13306, Windhoek | Tel: +264 61 284 2111 | DEA: +264 61 284 2701

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Correspondences can be done on the portal or please use
eia@met.gov.na



Animal and Ecosystem Health Consultant
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✉ ekkehardwk@gmail.com
📦 P.O. Box 594 Swakopmund

**Document 5: Screening notification & instructions received from EC
office (12 January 2026)**

Your application is verified

13:11 (3
hours ago)

to me



REPUBLIC OF NAMIBIA
Ministry of Environment, Forestry & Tourism

2026-01-12

Dear Ekkehard Klingelhoefter,

This email serves to inform you that your application **APP-006838** has been verified for Losange Lodges (Pty) LTD t/a Bush Camp:

Taking the following into considerations:

- Location of the project
- Pollution potential
- Scale of operation of the project

Please upload the following documents:

- EMP
- Confirmation of screening notice received (through email) in terms of assessment procedures (Section 35 (1)(a)(b) of the Environmental Management Act, No 7 of 2007)

**ENVIRONMENTAL MANAGEMENT PLAN (EMP) for Losange Lodges (Pty) LTD t/a BUSH CAMP
APP 251222-006838**

- Preliminary Site Map (Project boundaries) with coordinates (decimal degrees) and a Legend
- CV of Environmental Assessment Practitioner (EAP)
- Declaration for the Submission of Assessment Reports and other Support Documents (upload Declaration Form from www.eia.mef.gov.na (downloads)
- Proof of written notice to any other organ of state having jurisdiction in respect of any aspect of the activity

Please login onto our portal to upload required documents, if any
<https://eia.met.gov.na>

NB- for the purpose of Section 38 of the Environmental Management Act, 2007 read with Regulation 4(d), kindly forward copies of all relevant documents i.e. (application forms, EIA, Scoping reports, EMP etc.) to the office of the Environmental Commissioner

Thank you

Phillip Troskie Building
P/Bag 13306, Windhoek | Tel: +264 61 284 2111 | DEA: +264 61 284 2701

Please do not reply directly to this email. It was sent from an unattended mailbox.
Correspondences can be done on the portal or please use
eia@met.gov.na



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✉ ekkehardwk@gmail.com
📦 P.O. Box 594 Swakopmund

**Document 6: Declaration for the Submission of Assessment Reports
for Bush Camp, Mayuni Conservancy**

Declaration of authorship

APPLICATION NUMBER: APP 25122-006838

Project Title:

To offer and operate 4 exclusive camp-sites east of the Kwando River in Mayuni Conservancy.

Report 1: Background Information Document (BID) for Bush Camp, Mayuni Conservancy

Report 2: Environmental Management Plan (EMP) for Bush Camp

Note: AI was not used to generate nor to compile the above 2 reports

I, Ekkehard Klingelhoef (full name of Environmental Assessment Practitioner - EAP) understand and agree that the information I have furnished in this submission will be reviewed by the Office of the Environmental Commissioner (OEC). I accept that the Environmental Commissioner, will hold me accountable in terms of Section 43(1)(b) of the Environmental Management Act, Act No. 7 of 2007 for any inaccurate or misleading information knowingly provided in the following documentation.

Tick the box (es) applicable to your submission:

- ☐ Pro Forma Environmental Contract for Mining Claim(s)
- ☐ Environmental Questionnaire For Mining
- ☒ Scoping report / Background Information Document
- ☐ Environmental Impact Assessment (EIA)
- ☒ Environmental Management Plan (EMP),
- ☐ Consent from Relevant Authority

I certify, and, acknowledge that the provision of such information will impede the lawful carrying out of the duties, responsibilities and functions of the Environmental Commissioner. I declare that the information submitted is my own work. All direct or indirect sources used are acknowledged as references.

Consultancy Name: Atlantic (Aquatic & Terrestrial) Consulting Services

EAP Signature: *E. Klingelhoef*

Date: 15 January 2026

NB- To be submitted jointly with Scoping Report, EIA, EMP documents to the Office of the Environmental Commissioner

Document 7: Abbreviated CV of EAP Dr E Klingelhoefter – December 2025



Ekkehard Klingelhoefter

Domicile

Wasserfall Street No. 2
Swakopmund,
Erongo Region

Plot No 18
Kubu and Kwena, Kaliembeza Village
Katima Mulilo, Zambezi Region

Contact details

Email: ekkehardwk@gmail.com

Cellphone: 081 719 3939

Marital status Married to Marion (Homeopathic Practitioner); they have a daughter and a son.

Higher Education Qualifications achieved:

- BSc degree major in Botany and Zoology
- BSc (Hons) in Wildlife Management
- MSc in Terrestrial Ecology: Tongaland Elephant
- PhD in Fishery Management and Oceanography
- Diploma in Tertiary Education (focus on Androgocis and Gerongocis)
- Diploma in Oceanography: Open University, UK

Languages spoken

- a. English (fluent) b. German (fluent) c. Afrikaans (fluent)
d. Numerous Nguni dialects (basic to fluent)

**ENVIRONMENTAL MANAGEMENT PLAN (EMP) for Losange Lodges (Pty) LTD t/a BUSH CAMP
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Positions held to date

- Student researcher: on human elephant conflict amongst the Tonga community (30 months), Kwa Zulu Natal, RSA
- Regional Conservation Ecologist (4 years), Mpumalanga, RSA
- Lecturer to future teachers (2 years) at Mgwenya Teachers College: Biology, RSA
- Lecturer to future wildlife conservationists (3 years) at NUST (Polytechnikon of Namibia)
- Principal scientist of the horse mackerel research unit: Swakopmund, Atlantic Ocean (7 years)
- Chief scientist of the oceanographer research unit: Swakopmund, Atlantic Ocean (6 years)
- Director & Deputy Director: Aquaculture & Inland Fisheries (8 years) for MFMR
- Regional Training Officer for: Angola, Namibia, South Africa: BCC (Benguela Current Commission - 1 year)
- Lecturer & HoD: Department of Wildlife Management and Tourism Studies -UNAM (10 years)
- Currently operating as a Freelance Environmental Consultant (EIA and EMPs) and student support

Atlantic Consulting Services cc

Director of this CC and with a team of professionals offer the following services with focus on Wildlife, Fisheries, Tourism i.e. Compliance (EMPs) and student support.

- EMPs at tourism establishments with focus on:
 - waste management (solids and liquids) to facilitate ECCs at MEFT
 - water usage and discharge of effluent to facilitate licenses at MAFWLR
- Business plans and EMP's for aquaculture & aquaponics projects
- Guide for international students on educational tours in Namibia
- Part time lecturing and student support (research proposals, editing Hons, MSc and PhD thesis)
- Logistics for student internships, practical and field excursions
- Aquaculture license application
- Business plans relating to conservation and aquaculture
- Consultancies in other related fields disciplines

Other fields of expertise

- a. Acquired skills in project implementation and management e.g. GRN capital projects (Aquaculture Units) and co-ordinated the development of infrastructure for a Wildlife/Tourism Campus at Katima Mulilo.
- b. Feasibility studies e.g. aquaponics for Hans Seidel Foundation.
- c. EIA/EMP consultancies: focus on aquaculture e.g. Salmon Farming in the sea off Luederitz, EMP for waste management at Lodges.
- d. Capacity building to staff and students within the Department of Wildlife Management and Tourism Studies (DWMTS), at Katima Mulilo UNAM Campus.
- e. Experience in staff structure development for different Divisions/Directorates based on expected outcomes/deliverables.
- f. Pre-planning, implementation, monitoring and evaluation of donor agency projects within the Ministry of Fisheries and Marine Resources e.g. with GTZ/GIZ, JICA, VietNam, Cuba, Spain, Norway, Finland, Iceland and lately KfW (through UNAM).
- g. Gained experience in working with international / regional organizations such as GTZ/GIZ; KfW; NORAD; ICEDA; JICA; NNF; IWC, Tuna Commission, NAMPAB, Spanish Agency (SAIDC); Benguela Current Commission - BCC (Angola, and South Africa).

**ENVIRONMENTAL MANAGEMENT PLAN (EMP) for Losange Lodges (Pty) LTD t/a BUSH CAMP
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- h.** Represented Namibia at the:
 - International Whaling Commission in Grenada and Newfoundland
 - FAO in Rome, Italy on Fisheries related issues.
- i.** Ability to teach and mentor students – at Polytechnic (NUST) and UNAM pertaining to conservation, wildlife management, HWC, plant taxonomy, entomology, ornithology, ecology, coastal and inland fishery research – to name a few.
- j.** Instrumental in promoting and developing the aquaculture sector in Namibia; assist in drafting the Aquaculture Strategic Plan, Act and Regulations.
- k.** Curriculum development in conservation, wildlife management and aquaculture programs.
- l.** Develop the field Attachment (Internship) Training Manual for students of the Polytechnikon (1988) and revised/updated for the Department of Wildlife Management and Tourism Studies (2014 and 2023).
- m.** Conducted a feasibility study on the potential of aquaponics in the Zambezi Region as an alternative livelihood, for the Hans Seidel Foundation (Windhoek) in 2021.
- n.** Current focus on compilation of EMPs for lodges located along perennial rivers to ensure compliance to secure ECCs

Latest co-author Publication

Meyer, M., **Klingelhoefter, E.**, Naidoo, R., Wingate, V., and Börner, J...2021. Tourism opportunities drive woodland and wildlife conservation outcomes of community-based conservation in Namibia's Zambezi Region. *ECOLEC*, Vol. 180 (c). DOI: 10.1016/j.ecolecon.2020.1068638.

Currently in draft:

- i) Biannual bird counts in the Kasai Channel at Impalila Island, of the Zambezi Region.
- i) Vegetation and village mapping of Impalila Island, in the Zambezi Region.

Self-drive ambitions:

It is my ambition to contribute through new innovative approaches to:

- ☐ the betterment of the livelihoods of communities in rural areas
- ☐ parttime lecture students and to ensure that they acquire the necessary skills to enter the job market or to be self-employed (entrepreneurship)
- ☐ to continue to promote and to support the aquaculture industry (mariculture and aquaponics)
- ☐ encourage lodges to implement best practices in waste management and water abstraction
- ☐ contribute to the sustainable management and utilization of the natural marine and terrestrial resources
- ☐ to offer student support and mentorship in research projects, internship and field excursions.