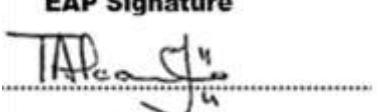


ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP) FOR THE PROPOSED EAGLE ROCK TENTED CAMPSITE AND TOURISM FACILITIES

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1. INTRODUCTION

This **Environmental and Social Management Plan** (ESMP) has been developed for **BB-9 Investment cc** to guide the construction and operation of the **Eagle Rock Tented Campsite and Tourism Facilities**. It ensures compliance with Namibia's Environmental Management Act (EMA) No. 7 of 2007.

Normally, an ESMP should demonstrate to the Office of the Environmental Commissioner (OEC) that the Proponent has taken reasonable measures to ensure all the primary set of management documents for the construction and operation of the lodge are provided. For this reason, the following documentations has been prepared as part of this ESMP:

- Guest Code of Conduct.
- Local Recruitment & Training Policy.
- Grievance Redress Mechanism.

2. PROJECT OVERVIEW AND RESPONSIBILITY

- **Proponent:** BB-9 Investment cc.
- **Location:** De Riet Village, Khorixas Constituency, Kunene Region.
- **Scope:** 10 luxury tented camps, 10 standard campsites, and 2 ablution blocks.
- **Key Responsibility:** The Proponent and the Site Manager are responsible for ensuring all staff and contractors adhere to this ESMP.

3. ENVIRONMENTAL MANAGEMENT MITIGATION

Table 1: mitigations.

Project Phase	Potential Impact	Mitigation Actions	Responsibility
Construction	Soil Erosion & Disturbance	Limit clearing to the footprint of the tents/structures. Avoid clearing endemic flora.	Site Contractor

Project Phase	Potential Impact	Mitigation Actions	Responsibility
Construction	Waste Generation	Implement a "leave-no-trace" policy. All construction rubble must be removed to a licensed site in Khorixas.	Site Contractor
Operation	Wildlife Disturbance	No fencing of the site to maintain biodiversity corridors for desert-adapted elephants and rhinos.	Site Manager
Operation	Water Scarcity	Install low-flow showerheads and dual-flush toilets. Implement a greywater recycling system for landscaping.	Proponent
Operation	Biodiversity Loss	Prohibition of off-road driving. Guests must stay on designated paths to protect endemic plant species.	Tour Guides
Operation	Light & Noise Pollution	Use "dark-sky" compliant downward-facing lighting. Enforce "quiet hours" to maintain the wilderness sense of place.	Site Manager

4. SOCIAL MANAGEMENT & BENEFIT SHARING PLAN

Because De Riet is highly dependent on climate-vulnerable farming, this project serves as a critical adaptation strategy.

- **Employment Priority:** A "Local First" policy shall be implemented, specifically targeting youth and women from De Riet for construction and hospitality roles.
- **Market Access:** Establish a dedicated space within the facility for local farmers and artisans to sell gastronomy products (traditional foods) and crafts.
- **Cultural Integration:** Tourism activities (tours/walks) must be designed in consultation with community elders to ensure traditional lifestyles are respected and not "commodified" disrespectfully.
- **Capacity Building:** BB-9 Investment cc will provide basic hospitality and conservation training to local employees to bridge the specialized expertise gap.

5. MONITORING AND AUDITING

To ensure the effectiveness of this plan, the following monitoring schedule is proposed:

1. **Water Usage Monitoring:** Monthly recording of water consumption to ensure local aquifers are not depleted.
2. **Wildlife Sightings Log:** Keeping a record of rhino and elephant movements near the site to ensure the campsite is not causing habitat avoidance.
3. **Annual Environmental Audit:** An independent Environmental Assessment Practitioner (EAP) should conduct an annual audit to verify compliance with the Environmental Clearance Certificate (ECC).

6. EMERGENCY RESPONSE: HUMAN-WILDLIFE CONFLICT (HWC)

Given the proximity to rhinos and desert-adapted elephants, a specific HWC protocol is required:

- **Staff Training:** All staff must be trained by MEFT (Ministry of Environment, Forestry and Tourism) or local conservancy officers on elephant safety.
- **Guest Briefing:** Mandatory safety briefings for all guests upon arrival regarding wildlife encounters.
- **Infrastructure:** Secure food storage and waste bins to prevent "problem animal" behavior from hyenas or elephants.

7. CONCLUSION

This ESMP transforms the Eagle Rock project from a simple construction task into a sustainable development tool for De Riet. By focusing on biodiversity corridors and local economic trickledown, BB-9 Investment cc can successfully pivot the local economy from vulnerable farming to resilient ecotourism.

GUEST CODE OF CONDUCT: EAGLE ROCK TENTED CAMPSITE

This **Guest Code of Conduct** is designed to preserve the "sense of place" at Eagle Rock and protect the fragile ecosystem of the Khorixas Constituency. It should be printed on recycled paper and placed in every tented room and at the reception area.

Welcome to the ancient landscapes of De Riet. To ensure your stay supports the conservation of our desert-adapted wildlife and the prosperity of our local community, we kindly ask you to adhere to the following guidelines:

1. Wildlife & Habitat Protection

- **Maintain Distance:** You are in a high-density rhino and desert-adapted elephant area. Always maintain a minimum distance of **50 meters** from wildlife. Never attempt to feed or track animals without a certified local guide.
- **Stay on the Path:** The transition zone between the savannah and desert hosts **66% of Namibia's endemic plants**. Walking off designated trails can crush rare flora that takes decades to grow.
- **No Off-Roading:** Driving off marked tracks causes permanent soil compaction and erosion in this arid environment.

2. Resource Conservation

- **Water is Life:** De Riet is a water-scarce region recovering from prolonged drought. Please keep showers short and reuse towels when possible.
- **Dark Sky Policy:** To protect the nocturnal behavior of local fauna and allow for world-class stargazing, please turn off outdoor tent lights when not in use.

3. Social & Cultural Respect

- **Ask Before You Snap:** When visiting De Riet village or interacting with local inhabitants, please ask for permission before taking photographs of people or their homesteads.
- **Support Local:** We encourage you to purchase crafts and gastronomy products directly from the community market. This ensures that the benefits of your visit "trickle down" to the families who call this land home.

Water Management & Conservation Flow

To help you understand why we prioritize water conservation, the diagram below illustrates how we manage this precious resource in a desert-transition zone.

Safety & Coexistence

Because Eagle Rock is an unfenced facility located within a vital biodiversity corridor, please observe these safety rules:

1. **Night Escorts:** Do not walk between the campsites and the main lodge alone after dark; please request a staff escort.
2. **No Food in Tents:** To avoid attracting curious wildlife (such as hyenas or elephants), please do not keep unsealed food inside your luxury tent.

LOCAL RECRUITMENT & TRAINING POLICY: DE RIET COMMUNITY

1. The "Community First" Hiring Hierarchy

To ensure equitable benefit-sharing, BB-9 Investment cc will follow a tiered recruitment strategy:

1. **Tier 1:** Residents of De Riet Village (with a focus on youth and women).
2. **Tier 2:** Residents of the wider Khorixas Constituency.
3. **Tier 3:** Kunene Region at large.
4. **Tier 4:** National recruitment (only for highly specialized roles not available locally).

2. Targeted Quotas & Inclusion

- **Youth Empowerment:** At least **40%** of the construction and operational workforce shall be under the age of 35.
- **Gender Equality:** A minimum of **30%** of roles, including leadership positions (e.g., Assistant Manager, Head Housekeeper), will be reserved for women.
- **Farming Transition:** Preference will be given to family members of farmers severely impacted by the 2013–2022 drought.

👉 Skills Development & Capacity Building

Since specialized tourism expertise may be limited locally, the project will implement a two-phase training program:

Phase A: Pre-Opening "Hospitality Bootcamp"

Before the campsite opens, selected local candidates will undergo a 4-week training program covering:

- **Eco-Tourism Ethics:** Understanding the sensitivity of the rhino and elephant populations.
- **Service Excellence:** Housekeeping, food & beverage service, and guest relations.
- **Language & Communication:** Basic English and tourism-specific terminology.

Phase B: On-the-Job Mentorship

- **Guide Mentorship:** Senior guides will pair with local youth to transfer knowledge on desert-adapted flora and fauna.
- **Financial Literacy:** Training for local staff on savings and micro-entrepreneurship, helping them manage their new steady income.

Community Liaison Committee (CLC)

To maintain transparency and prevent social friction, a **Community Liaison Committee** will be established:

- **Composition:** One representative from BB-9 Investment cc, the De Riet Traditional Authority, and a representative for the local youth/women.
- **Role:** To oversee the recruitment process, verify the "local status" of applicants, and act as a grievance channel for any community concerns.

Monitoring Social Impact

The success of this policy will be measured annually through:

- **Total Local Wage Bill:** The percentage of total salaries paid directly to De Riet residents.
- **Promotion Rate:** Number of local staff moving from entry-level to supervisory roles.
- **Local Procurement:** Total spend on local gastronomy (meat, vegetables) and crafts.

GRIEVANCE REDRESS MECHANISM (GRM)

1. Purpose and Scope

The GRM is available to any person or group affected by the project's activities (e.g., noise, dust, unfair hiring, or environmental damage).

It is designed to be **accessible, culturally appropriate, and free of cost.**

2. The Five-Step Grievance Process

Step	Action	Timeline
1. Submission	The complainant submits a verbal or written grievance to the Community Liaison Officer (CLO) or via a "Suggestion Box" at the village office.	Day 0
2. Acknowledgement	The Site Manager acknowledges receipt of the complaint in writing or via a community meeting.	Within 3 Days
3. Investigation	The Proponent investigates the claim. For complex issues (e.g., land disputes), the Traditional Authority is consulted.	Within 7 Days
4. Resolution	A proposed solution is presented to the complainant. If accepted, the action is implemented.	Within 14 Days
5. Follow-up	The CLO checks back with the complainant to ensure the issue has been permanently resolved.	Within 30 Days

3. Channels for Communication

To bridge the "specialized expertise gap," we offer multiple ways to communicate:

- **The "Green Box":** A physical box located at the De Riet community center for anonymous feedback.
- **Direct Access:** A designated hour every Friday where the Site Manager is available at the campsite gate for "Open Door" talks.
- **Traditional Authority:** Community members may choose to report grievances through their traditional leaders, who will then contact BB-9 Investment cc.

4. Grievance Categories

To ensure quick processing, grievances are categorized as follows:

- **Category A (Environmental):** Issues regarding water waste, off-road driving, or wildlife disturbance.
- **Category B (Social/Labor):** Unfair recruitment practices, late wage payments, or disrespectful behavior by staff/tourists.
- **Category C (Health & Safety):** Construction dust, unsafe driving, or incidents involving domestic livestock and camp vehicles.

Grievance Log Maintenance

The Proponent will maintain a **Grievance Register** as part of the Environmental Clearance Certificate (ECC) requirements. This log will track:

1. Date of complaint.
2. Name/Contact (unless anonymous).
3. Description of the issue.
4. Action taken.
5. Status (Open/Closed).

Note on Confidentiality: All complainants have the right to remain anonymous. Retaliation against any person filing a grievance is strictly prohibited and will lead to disciplinary action for project staff.

5. Escalation Path

If a grievance cannot be resolved through the internal process, the matter may be referred to:

1. The **Khorixas Constituency Councillor**.
2. The **Ministry of Environment, Forestry and Tourism (MEFT)** – Office of the Environmental Commissioner.