



Submitted to: Gondwana Collection Namibia (Pty) Ltd
Attention: Mr. Quintin Hartung
P.O. Box 80205
Windhoek
Namibia

REPORT:

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN FOR DRAAIHOEK LODGE

PROJECT NUMBER: ECC-62-642-REP-03-A

REPORT VERSION: REV 01

DATE: 02 JULY 2025



TITLE AND APPROVAL PAGE

Project Name: Environmental and social management plan for Draaihoek Lodge
Client Company Name: Gondwana Collection Namibia (Pty) Ltd
Client Name: Mr. Quintin Hartung
Ministry Reference: APP-005965
Status of Report: Final for Government Submission
Project Number: ECC-62-642-REP-03-A
Date of Issue: 02 July 2025
Review Period: Record of decision period

ENVIRONMENTAL COMPLIANCE CONSULTANCY CONTACT DETAILS:

We welcome any enquiries regarding this document and its content. Please contact:

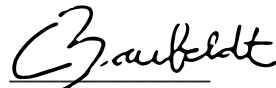


Environmental Compliance Consultancy (Pty) Ltd
PO Box 91193, Klein Windhoek, Namibia
Tel: +264 81 669 7608
Email: info@eccenvironmental.com

Quality Assurance**Authors:**

Samuel Shinyemba

Environmental Compliance Consultancy

Checked By:

Carlene Baufeldt

Environmental Compliance Consultancy

Approved By:

Jessica Bezuidenhout

Environmental Compliance Consultancy

DISCLAIMER

The report has been prepared by Environmental Compliance Consultancy (Pty) Ltd (ECC) (Reg. No. 2022/0593) on behalf of the Proponent. Authored by ECC employees with no material interest in the report's outcome, ECC maintains independence from the Proponent and has no financial interest in the Project apart from fair remuneration for professional fees. Payment of fees is not contingent on the report's results or any government decision. ECC members or employees are not, and do not intend to be, employed by the Proponent, nor do they hold any shareholding in the Project. Personal views expressed by the writer may not reflect ECC or its client's views. The environmental report's information is based on the best available data and professional judgment at the time of writing. However, please note that environmental conditions can change rapidly, and the accuracy, completeness, or currency of the information cannot be guaranteed.

TABLE OF CONTENTS

1	Introduction	7
1.1	Project background	7
1.2	Preliminary Project planning highlights	7
1.2.1	Stakeholder engagement	7
1.2.2	ESIA Screening exercise	8
1.3	Environmental regulatory requirements	12
1.4	Purpose of this report	12
1.5	Management of this ESMP	12
1.6	Limitations, uncertainties and assumptions related to this ESMP	12
1.7	Environmental assessment practitioner (EAP)	13
2	Environmental management framework	14
2.1	Objectives and targets	14
2.2	Organisational structure, roles and responsibilities	14
2.3	Contractors and subcontractors	16
2.4	Workforce competency	17
2.5	Employment	17
3	Communication and awareness	18
3.1	Internal communication	18
3.1.1	Site inspection and toolbox talks	18
3.1.2	Training and environmental awareness	19
3.2	External communication	19
3.2.1	Environmental emergency and response	19
3.2.2	Complaint handling and recording	20
4	Reporting, compliance and enforcement	21
4.1	Environmental performance management	21
4.2	Construction phase: environmental inspections and compliance monitoring	21
4.2.1	Daily and weekly compliance monitoring	21
4.2.2	Monthly compliance monitoring	21
4.3	Operational phase: environmental inspections and compliance monitoring	21
4.4	Reporting	22
4.4.1	Non-compliance	23
4.4.2	Disciplinary actions	23
5	Environmental and social management	24
5.1	Environmental performance management	24

5.2	Planning phase.....	24
5.3	Construction phase	29
5.4	Operational phase	40
5.5	Decommissioning phase.....	46
6	Property lease, transfer or cessation of the joint venture partnership.....	49
7	Implementation of the ESMP	50

LIST OF TABLES

Table 1 - Project team roles and responsibilities	15
Table 2 - Emergency contact details	19
Table 3 – Environmental aspects, management and mitigation measures for the planning phase	25
Table 4 – Environmental and social aspects, impacts, mitigation and monitoring measures for the construction phase	30
Table 5 – Environmental and social aspects, impacts, mitigation and monitoring measures for the operational phase	41
Table 6 - Rehabilitation plan for the Project	47
Table 8 - Archaeological and heritage aspects	54

LIST OF FIGURES

Figure 1 - Location of the proposed Project site	9
Figure 2 - Site infrastructure layout	10
Figure 3 - Visual overview of the pod	11

APPENDICES

Appendix A – Lodge technical drawings.....	51
Appendix B – Focus group meeting minutes and stakeholder’s consent letters.....	52
Appendix C – Examples of heritage features recorded in the broader NamibRand Nature Reserve.....	53
Appendix D - Chance find procedure	54

ABBREVIATIONS

Abbreviation	Description
%	percentage
>	greater than
±	plus minus
APU	Anti-Poaching Unit
DEAF	Department of Environmental Affairs and Forestry

Abbreviation	Description
DWA	Department of Water Affairs
EAP	environmental assessment practitioner
ECC	Environmental Compliance Consultancy (Pty) Ltd
EMA	Environmental Management Act, No. 7 of 2007
ESIA	environmental and social impact assessment
ESMP	environmental and social management plan
GCN	Gondwana Collection Namibia (Pty) Ltd
GSNL	Greater Sossusvlei- Namib Landscape
GSNLA	Greater Sossusvlei- Namib Landscape Association
GIS	geographic information system
GPS	geographic positioning system
ha	hectare
HR	human resources
I&APs	interested and affected parties
i.e.	that is
JV	joint venture
km	kilometre
km/h	kilometre per hour
L	litre
Ltd.	limited
m ³ /day	cubic metre per day
MSDS	material safety data sheet
MAFWLR	Ministry of Agriculture, Fisheries, Water and Land Reform
MEFT	Ministry of Environment, Forestry and Tourism
MIME	Ministry of Industrialisation, Mines and Energy
MLIREC	Ministry of Labour, Industrial Relations and Employment Creation
NRNR	NamibRand Nature Reserve
NTB	Namibia Tourism Board
NHC	National Heritage Council
PPE	personal protective equipment
Pty	proprietary
PV	photovoltaic

1 INTRODUCTION

1.1 PROJECT BACKGROUND

Environmental Compliance Consultancy (Pty) Ltd (ECC) has been engaged by Gondwana Collection Namibia (Pty) Ltd (GCN) (hereafter referred to as Gondwana or the Proponent) to develop a comprehensive environmental and social management plan (ESMP) and apply for the environmental clearance certificate for the proposed construction and operation of the Draaihoek Lodge on farm Draaihoek No. 119 (privately-owned land). Farm Draaihoek No. 119 is in the Maltahöhe District and lies adjacent to the NamibRand Nature Reserve (NRNR), within the Greater Sossusvlei-Namib Landscape (GSNL) conservation area, Hardap Region, Namibia (Figure 1).

Gondwana has duly entered into a joint venture (JV) agreement with the farm owners for this development. The Project entails the development of five (5) luxurious, exclusive, self-contained units (referred to as “pods”) which will be elevated on stilts and strategically positioned along the rocky mountainside. The overall footprint for the pod’s development is calculated to be approximately 490 m². A single lodge staff support facility will be constructed to serve as the operational hub and will comprise of key functional areas such as kitchen, office, bar, storage rooms (dry, cold and freezer), dining area, lounge and pantry. Additionally, a permanent staff lodge (±0.2 ha / 2,000 m²) will be developed for the operational personnel. The staff lodge will consist of 20x on-suite rooms, a kitchen, dining and entertainment area. Additional supporting infrastructure to be constructed include a trickling filter wastewater treatment plant for effective waste management and installation of roof-mounted photovoltaic (PV) solar panels and associated systems to supply sustainable energy supply required for lodge operations. The lodge will be energy self-sufficient and will not connect to any external power supply source. Two existing farmhouses will be used to temporarily accommodate the construction team and will be demolished upon completion of the construction phase. The Proponent plans to abstract approximately 10 m³ of water daily from existing boreholes during both the construction and operational phase. The technical drawings of the pods and staff lodge are provided in Appendix A.

The Project site (i.e. farm Draaihoek No. 119) is located approximately 55 km south of Sesriem and can be accessed via the D0826 gravel road (Figure 1). The site infrastructure layout is presented in Figure 2, while a visual overview of the pod is shown in Figure 3.

1.2 PRELIMINARY PROJECT PLANNING HIGHLIGHTS

1.2.1 STAKEHOLDER ENGAGEMENT

As part of the Project planning process, the Proponent engaged the neighbouring farming community, the NRNR and the GSNLA regarding the joint venture partnership and related Project activities. These engagements aimed to establish long-term collaborations and

transparent communications with the local stakeholders and interested and affected parties (I&APs) and ensure the Project aligns with broader social, environmental and conservation values. The minutes from these focus group meetings, along with the stakeholder's consents received to date in relation to the proposed Project are provided in Appendix B.

1.2.2 ESIA SCREENING EXERCISE

ECC conducted a preliminary screening exercise to assess the potential environmental and social impacts likely associated with the proposed development. The findings indicate that both construction and operational activities are expected to be minimal and low in impact. Additionally, the Project footprint is relatively small and will result in minimal environmental disturbances.

Considering the limited scale and low-impact nature of the Project and the absence of any sensitive or high-risk environmental receptors within the development area, ECC has determined that a full environmental and social impact assessment (ESIA) is not warranted at this stage. Additionally, no comprehensive studies are required, or extensive stakeholder consultation are required beyond the current engagement.

This ESMP has been developed to outline the best environmental practices and practical mitigation measures and monitoring requirements to be implemented throughout the various phases of the Project to preserve the receiving environment and its ecological functions. The ESMP also aims to ensure that local social receptors are neither disturbed nor adversely impacted during any phase of the Project.

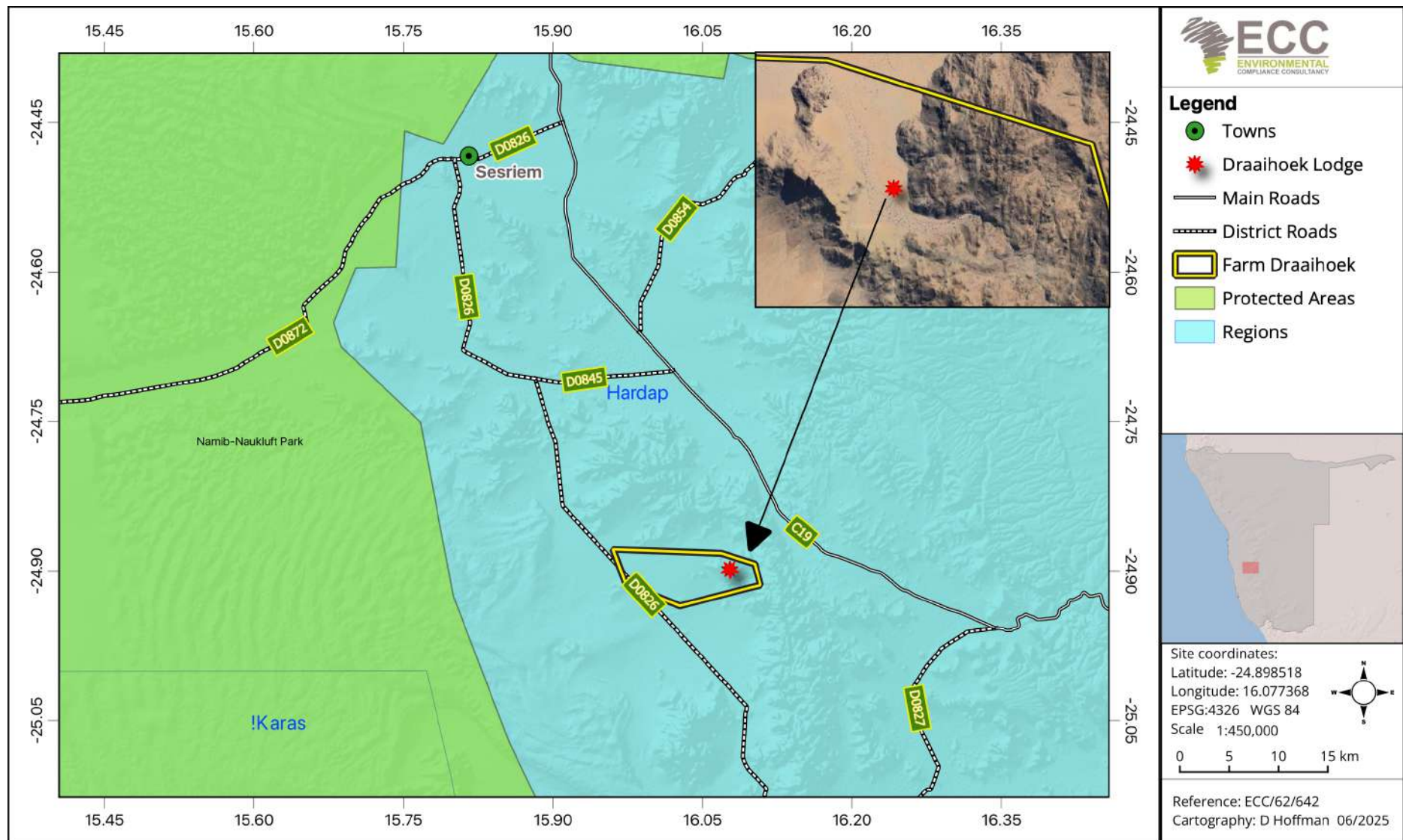


Figure 1 - Location of the proposed Project site

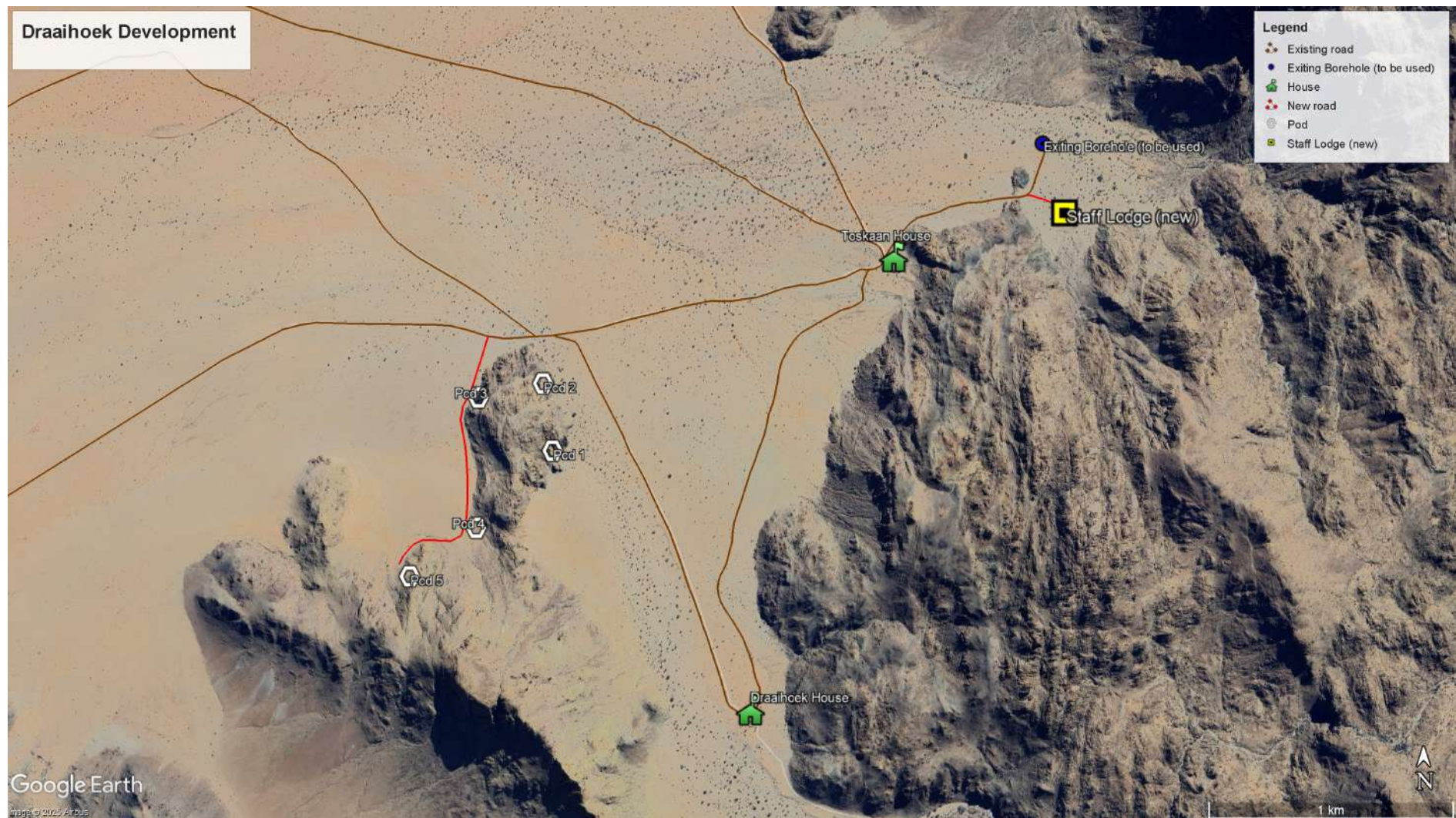


Figure 2 - Site infrastructure layout



Figure 3 - Visual overview of the pod

1.3 ENVIRONMENTAL REGULATORY REQUIREMENTS

The proposed Project activities trigger activities listed under the Environmental Management Act, No. 7 of 2007 (EMA) and its 2012 Regulations. Prior to commencement of construction activities, an environmental clearance certificate must be obtained from the Department of Environmental Affairs and Forestry (DEAF). In addition to this, the Project is required to register the Project with the Namibia Tourism Board (NTB) and must obtain licences from the Department of Water Affairs (DWA) for the registration, abstraction and use of water from existing boreholes, as well as for the construction and operation of a wastewater treatment facility.

This ESMP has been prepared in terms of the requirements of the EMA and its 2012 Regulations.

1.4 PURPOSE OF THIS REPORT

This ESMP provides a logical framework, mitigation measures, management strategies and monitoring requirements for the proposed Project and its associated activities. This ensures that the potential environmental impacts are curbed and minimised as far as practically possible and that statutory and other legal obligations are adhered to and fulfilled. Outlined in the ESMP are the protocols, procedures and roles and responsibilities to ensure the management arrangements are effectively and appropriately implemented.

This ESMP is a live document and shall be reviewed at predetermined intervals, and or updated when or if the scope of work alters, when information is added or when unforeseen environmental and social impacts have been identified. All lodge staff members and appointed contractors and their subcontractors will be legally required to comply with the requirements set out in this ESMP, once approved by the Ministry of Environment, Forestry and Tourism (the competent authority).

1.5 MANAGEMENT OF THIS ESMP

The Proponent will hold the environmental clearance certificate for the Project and will be responsible for the implementation and management of this ESMP. The implementation and management of this ESMP, and thus the monitoring of compliance, will be undertaken through daily duties and activities, as well as monthly inspections. All Project personnel throughout all Project phases are expected to comply with the requirements stipulated in this ESMP.

1.6 LIMITATIONS, UNCERTAINTIES AND ASSUMPTIONS RELATED TO THIS ESMP

Where there is any conflict between the provisions of this ESMP and any contractor's obligations under their respective contracts, including statutory requirements (such as licences, Project approval conditions, permits, standards, guidelines, and relevant laws), the contract should be amended, and statutory requirements are to take precedence.

The information presented in this ESMP is based on the proposed scope of work as provided by the Proponent. When the design or operation method changes, this ESMP will need to be updated, and additional assessment may be required.

1.7 ENVIRONMENTAL ASSESSMENT PRACTITIONER (EAP)

This report has been prepared by Environmental Compliance Consultancy (Pty) Ltd (ECC) (Reg. No. 2022/0593) on behalf of the Proponent. Authored by ECC employees with no material interest in the report's outcome, ECC maintains independence from the Proponent and has no financial interest in the Project apart from fair remuneration for professional fees. Payment of fees is not contingent on the report's results or any government decision. ECC members or employees are not, and do not intend to be, employed by the Proponent, nor do they hold any shareholding in the Project. Personal views expressed by the writer may not reflect ECC or its client's views. The environmental report's information is based on the best available data and professional judgment at the time of writing. However, please note that environmental conditions can change rapidly, and the accuracy, completeness, or currency of the information cannot be guaranteed.

All compliance and regulatory requirements regarding this report should be forwarded by email or posted to the following address:

Environmental Compliance Consultancy (Pty) Ltd
PO Box 91193, Klein Windhoek, Namibia
Tel: +264 81 669 7608
Email: info@eccenvironmental.com

2 ENVIRONMENTAL MANAGEMENT FRAMEWORK

2.1 OBJECTIVES AND TARGETS

The Project site is in a pristine ecological environment. The climatic condition is variable, and the general areas is characterised by minimal human disturbances, farming community, sparse vegetation and diverse wildlife populations and their natural corridors. To prevent and mitigate potential negative environmental and social impacts, specific environmental objectives and targets have been developed. These are developed to ensure that all Project activities are conducted in a manner that minimise potential impacts on both the receiving environment and surrounding social receptors.

The overall environmental and social objectives for the Project are as follows and must align with Gondwana's strategic corporate environmental and social objectives for new developments:

- Manage waste efficiently and reduce the potential for environmental pollution;
- Use natural resources effectively and efficiently;
- Prevent environmental degradation by limiting land use and development to designated areas of development (Project footprint);
- Alignment with the NRR and the GSNL environmental policies and guidelines;
- Preserve the natural state of the farm;
- Resolve complaints received from the surrounding community through effective grievance resolutions mechanisms;
- Minimal interruptions and interactions with wildlife populations and their natural corridors; and
- Engage in eco-tourism initiatives and best environmental practices throughout the Project's lifespan.

2.2 ORGANISATIONAL STRUCTURE, ROLES AND RESPONSIBILITIES

The Proponent shall be responsible for:

- Ensuring all lodge staff members, appointed contractors, subcontractors and visitors (including tourists) comply with the procedures set out in this ESMP;
- Ensuring that all personnel receive adequate supervision, and instruction to effectively fulfil the requirements stipulated in this ESMP;
- Ensuring that any person allocated specific environmental responsibilities is formally notified of their appointment and confirms that their responsibilities are clearly understood;
- Monitoring and evaluating the implementation of the ESMP to ensure continuous improvement and compliance throughout all phases of the Project;
- Keeping records of environmental incidents, corrective actions and induction activities for audit and reporting purposes;
- Promoting a culture of environmental awareness and accountability among all staff, contractors and visitors through ongoing communication and engagement; and

- Ensuring that contractors and subcontractors and all personnel under their employment comply with the requirements of this ESMP.

Table 1 outlines the key roles and responsibilities assigned to Project team members tasked with executing Project activities in compliance with the ESMP requirements.

Table 1 - Project team roles and responsibilities

Role	Responsibilities and duties
Proponent / Appointed Project manager	<ul style="list-style-type: none"> - Responsible for the overall management and implementation of this ESMP; - Develop a safety management plan to ensure that lodge staff are adequately trained, equipped and are fully aware of potential risks in their work areas; - Ensure site specific environmental policies are drafted/updated and communicated to all personnel employed at the lodge; - Responsible for providing the resources required to effectively run operations and comply with the ESMP; and - Appoint all managers and supervisors required to ensure effective running of operations.
Appointed Lodge manager	<ul style="list-style-type: none"> - Responsible for ensuring compliance with this ESMP including overseeing the execution of the proposed Project activities; - Ensure all personnel are aware of the commitments made in the ESMP and statutory licence and permit conditions approved for the Project; - Responsible for the overall management and revision of this ESMP. The frequency of review and updates shall be determined based on any material changes to the Project scope or other relevant developments; - Ensure adequate resources are made available for lodge staff to effectively implement commitments made in this ESMP; - Overseeing and supervising any work undertaken by the lodge staff members or appointed contractors; - Provisioning of environmental awareness/management training and inductions for all employees; - Ensure that best environmental practices are implemented throughout the Project lifecycle; - Receiving, recording and responding to community complaints; and - Report any non-compliance or accidents to stakeholders and regulatory authorities (e.g. MEFT, MAFWLR, MLIREC, NRNR, GSNLA and National Heritage Council (NHC)).

Role	Responsibilities and duties
Lodge supervisor(s)	<ul style="list-style-type: none"> - Overseeing the execution of Project activities carried out by personnel under their supervision to ensure work remain compliant to this ESMP; - Report any non-compliance or accidents to the Lodge manager; and - Allocating adequate resources to promote a safe and healthy working environment.
Lodge employees, Contractors, subcontractors and Gondwana's environmental department	<p>Responsible to comply with this ESMP throughout the Project lifecycle, in addition to:</p> <ul style="list-style-type: none"> - Demonstrating an understanding of the ESMP, including its content and requirements; - Attending briefings, training and toolbox talks on specific environmental matters; - Report any construction or operational activities that deviate from the ESMP; and - Timely implement corrective or remedial actions as directed by the Project manager or Lodge manager.

2.3 CONTRACTORS AND SUBCONTRACTORS

Contractors and their subcontractors contracted by the Proponent must be compliant with this ESMP and shall be responsible for the following:

- Undertake activities in accordance with this ESMP, as well as relevant policies, procedures, management plans, method statements, licences and contract obligations;
- Implement effective environmental and safety management measures;
- Adopt environmental best practices to ensure the preservation of the receiving environment and minimise potential environmental impacts to the greatest extent possible;
- Report environmental issues, including actual or potential environmental incidents and aspects, to the Project manager (during the construction phase), Lodge manager and supervisors (during the operational phase);
- Cooperate fully with environmental inspections, audits and monitoring activities conducted by the Project manager, Lodge manager, Lodge supervisor or regulatory authorities;
- Ensure that employees under their employment are made aware of, and comply with the requirements of this ESMP; and
- Ensure that appropriate corrective or remedial actions are implemented to address all environmental aspects and incidents. Lessons learnt should always be documented for future reference and continuous improvement.

2.4 WORKFORCE COMPETENCY

All personnel working on the Project shall be competent to perform tasks that have the potential to cause an environmental impact. In this instance, competence is defined in terms of appropriate vocational and hospitality education, specialised skill sets and work experience.

The Proponent, contractors and subcontractors shall comply with the Republic of Namibia's Regulations for Labour, Health and Safety and any subsequent amendments to these Regulations. The following conditions, amongst others must be complied with:

- A competent workforce must be employed for the construction phase, with demonstrated capability to perform effectively in elevated and mountainous environments;
- All Project personnel shall be provided with the necessary and appropriate personal protective equipment (PPE);
- Should foreign workers be hired, the Proponent shall ensure that they have valid work permits at all times;
- Occupational health and safety protocols are to be enhanced throughout the Project lifecycle;
- Regular toolbox talks and refresher training courses shall be conducted to reinforce health and safety and environmental responsibilities; and
- All Project personnel shall undergo an induction course covering environmental awareness, occupational safety procedures and site-specific risks before commencing work.

2.5 EMPLOYMENT

The Proponent and all contractors shall comply with the provisions of the Republic of Namibia's Regulation for Labour, Health and Safety, including and any amendments thereto, in relation to the recruitment of the Project workforce. The following shall be complied with:

- The Proponent and contractors in collaboration with local government and community authorities and their recruitment mechanisms, shall ensure that local people have access to information regarding job opportunities and are prioritised for employment in construction, operations or maintenance roles;
- The number of job opportunities shall be made known together with the associated skills and required qualifications;
- The maximum expected duration of the job, whether temporary or permanent, shall be indicated;
- Foreign workers with no proof of permanent legal residence and work permit shall not be hired; and
- All employees hired must be issued valid employment contracts specifying their position, hourly remuneration rate and assigned duties.

3 COMMUNICATION AND AWARENESS

To ensure potential environmental impacts are minimised, it is important that Project personnel are appropriately informed and briefed on how to properly implement the ESMP. It is also important that regular communication is maintained with stakeholders and regulatory authorities (i.e. surrounding farming community, NHC, MEFT, NRNR and GSNLA). This section outlines the framework for communication related to the implementation of the commitments that are specified in this ESMP.

3.1 INTERNAL COMMUNICATION

During construction, the Project manager and Site supervisor(s) shall communicate site-wide environmental issues to the Project team through the following means (as and when required):

- Site induction;
- Site notices;
- WhatsApp group (or preferred social communication mobile application tool);
- Method statements and risk assessment briefings;
- Daily, weekly and monthly audits and site inspections;
- Toolbox talks, including instructions on incident response procedures; and
- Briefing on key Project-specific social and environmental issues.

This ESMP shall be distributed to the Project team including contractors and subcontractors to ensure that the environmental requirements are adequately communicated. The key activities and environmentally and socially sensitive operations must be highlighted clearly to workers and contractors.

Throughout the construction phase, communication among the construction team shall include discussion on any complaints received and actions to resolve them, results of inspections and audits conducted, any non-conformance with this ESMP, and updates on objectives or target achievements.

3.1.1 SITE INSPECTION AND TOOLBOX TALKS

All personnel involved in the Project shall be inducted to the site regarding any specific environmental, social, health and safety issues. The workforce must be briefed on the observations recorded during the site inspection and risk assessment findings during toolbox talks. The workforce must demonstrate an understanding of the principles outlined in this ESMP, and the potential environmental and social impacts associated with their activities. All Project personnel must also demonstrate a clear understanding of the procedures required to control these impacts and the consequences of departure from these procedures.

All Project personnel must demonstrate an understanding of the following:

- Demonstrate an understanding of the site's environmental rules and the broader conservation policies and regulations established by MEFT, NRNR and GSNLA;

- Understand the necessary steps to address any environmental issues and identify the appropriate contacts for resolving such problems;
- Understand the potential consequences of non-compliance with this ESMP and violation of relevant statutory licences and permits conditions; and
- The roles of responsible people working on the Project.

3.1.2 TRAINING AND ENVIRONMENTAL AWARENESS

All personnel working on the Project during both the construction and operational phase must be competent to perform tasks that have the potential to cause an environmental impact. Competence is defined in terms of appropriate education, training and work experience. When it has been determined that certain skills are lacking, training and refresher courses must be offered to the workforce. The Lodge manager and Site supervisor(s) must ensure records of these training sessions are always kept onsite and filed.

3.2 EXTERNAL COMMUNICATION

The Project manager and Lodge manager shall represent the Project and shall liaise with external regulatory authorities (e.g. MEFT, NTB, NHC and MAFWLR), local conservation organisations (e.g. NRNR and GSNLA), civil society organisations and community representatives. This will ensure good working relations with the stakeholders and compliance with all relevant conservation regulations, Project approved licences and permits.

3.2.1 ENVIRONMENTAL EMERGENCY AND RESPONSE

An emergency is any abnormal event, which demands immediate attention. It is any unplanned event, which results in the temporary loss of management control at site, but where functional resources can manage the response. An emergency response plan document will be put in place that manages the response in relation to emergencies including environmental emergencies.

Table 2 provides a list of numbers to be contacted in case of an emergency.

Table 2 - Emergency contact details

Town	Ambulance	Police
Sesriem	+264 63 293 056	+264 63 293 005

All wildlife crimes must be promptly investigated and reported to MEFT and the local conservation groups (NRNR and GSNLA).

A 5000 litre above-ground storage tank will be installed on a concrete slab. The installation will include a bunded containment area (spillage tank) designed to capture and contain potential fuel spills or leaks. Should there be large-scale fuel spills (i.e. > 200 litres), the Ministry of Industrialisation, Mines and Energy (MIME) must be notified by completing form PP/11 (telephone: +264 61 284 8111) (as discussed in Section 4.4).

3.2.2 COMPLAINT HANDLING AND RECORDING

Any complaints received verbally by any personnel on the Project site shall be recorded by the receiver including:

- The name of the complainant;
- The contact details of the complainant;
- Date and time the complainant was received; and
- The nature of the complaint.

The information shall be provided to the Lodge manager and Project manager (during the construction phase) who are overall responsible for managing complaints. The Lodge manager and Project Manager must address the complaints by following these measures:

- Record the complaint in the complaint register; and
- Provide a written response to the complainant of the results of the investigation and action to be taken to rectify or address the matter(s). Where no action is taken, the reasons why are to be recorded in the register.

The Project team and contractor employees shall be informed about the complaints register, its location and the person responsible, to refer tourists or the public who wish to lodge a complaint. The complaints register shall be kept for the duration of the Project and must be available for government or public review, upon request.

4 REPORTING, COMPLIANCE AND ENFORCEMENT

4.1 ENVIRONMENTAL PERFORMANCE MANAGEMENT

This section outlines the overall monitoring commitments required for implementation during the construction, operational and decommissioning phase of the Project. It details procedures to ensure routine inspections and audits are conducted to ensure that Project's activities are aligned and remain compliant with this ESMP.

4.2 CONSTRUCTION PHASE: ENVIRONMENTAL INSPECTIONS AND COMPLIANCE MONITORING

4.2.1 DAILY AND WEEKLY COMPLIANCE MONITORING

A copy of this ESMP will be on-site throughout the construction phase and will be available upon request. Contractors and subcontractors must be issued with a copy of this ESMP. It is the responsibility of the Project manager and Site supervisor(s) to ensure this ESMP is complied with through their daily roles. Daily and weekly inspections will be undertaken by the Site supervisors. Any environmental concerns or impacts identified will be reported to the Project manager and actioned as soon as is reasonably practicable.

4.2.2 MONTHLY COMPLIANCE MONITORING

Monthly inspections will be undertaken by the Project manager and Site supervisors to assess whether the standards and procedures set out in this ESMP are being complied with and that environmental control measures are in place and working correctly and effectively. Any non-conformance will be recorded, including the following details: a brief description of non-conformance; the reason for the non-conformance; the responsible party; the result (consequence); and the corrective action(s) taken and any necessary follow up measures required.

4.3 OPERATIONAL PHASE: ENVIRONMENTAL INSPECTIONS AND COMPLIANCE MONITORING

An audit and inspection program must be developed to ensure effective operational performance. For example, the wastewater treatment facility and its drainage systems and water metering systems must be inspected and monitored accordingly based on a defined schedule (daily or weekly inspections). This will ensure leakages and groundwater contaminations are timely detected and addressed. The maintenance team (i.e. artisans, handymen and mechanics) will conduct these routine inspections.

The Lodge manager will conduct regular inspections of all infrastructure to ensure they are operating according to specifications and to identify any signs of deterioration. Any non-conformance will be recorded, including the following details: a brief description of non-

conformance; the reason for the non-conformance; the responsible party; the result (consequence); and the corrective action taken and any necessary follow up measures required.

4.4 REPORTING

All incident or non-compliance, including any environmental issue, wildlife crimes, failure of equipment or accident, is reported to the Project manager and Lodge manager throughout the lodge's lifecycle. The MEFT reserves the right to require the Proponent to submit bi-annual reports evaluating the Project's compliance with the commitments that are outlined in this ESMP. Wildlife crimes must also be reported to the local conservation groups (NRNR and GSNLA).

For large-scale spills (i.e., > 200 litres) and other significant environmental incidents, the fire service should be notified as required and the MEFT office should be informed of the incidents (telephone +264 61 284 2111). If the spillage is of a fuel source (i.e. petrol/diesel), the Ministry of Industrialisation, Mines and Energy (MIME) must be notified by completing form PP/11 (telephone: +264 61 284 8111).

If significant environmental spills (hydrocarbons) occur close or in a water source, the Department of Water Affairs (DWA) is to be notified. All correspondence with the relevant ministries should be by the Project manager or Lodge manager, with the assistance of the Site supervisor(s). Notification should occur no later than 48 hours after the incident has occurred.

For the clean-up of smaller spills, the relevant material safety data sheet (MSDS) should be consulted to determine the appropriate clean-up procedure. Basic spill response training will be provided as part of the site environmental induction, spill response equipment, including relevant MSDS copies, will be provided in areas where potentially environmentally hazardous chemicals may be used.

Occupational incidents and accidents incurred on site should be reported to the authorities (i.e. Occupational Safety & Health Department) at the Ministry of Labour, Industrial Relation and Employment Creation (MLIREC), by using form F.5.

In case of archaeological objects or heritage artefacts discovered on-site, the chance find procedure (Appendix D) must be followed and the NHC must be informed by the Project manager or Lodge manager.

The Lodge manager must ensure that the final effluent complies with general standards (Annexure 11) of the Water Resources Management Regulations and that all water quality analysis and reporting requirements specified in the licenses for the proposed activities are fully met, should this be required by DWA.

All correspondence and communication with local and regulatory authorities should be undertaken by the Lodge manager or Project manager.

4.4.1 NON-COMPLIANCE

Where it has been identified that activities are not compliant with this ESMP, the Project manager or Lodge manager must ensure that corrective actions are implemented to the extent that the activities return to being compliant as soon as possible. In instances where the requirements of the ESMP are not upheld, a non-conformance and corrective action notice will be produced. The notice will be generated during the inspections and the Lodge manager will conduct follow ups to determine whether the corrective actions are implemented as planned and instructed.

A non-compliance event / situation is considered if:

- There is evidence of contravention of this ESMP and associated indicators or objectives;
- The contractors or subcontractors have failed to comply with corrective actions or other instructions issued to them by the project manager, Lodge manager or qualified authority; or
- There is evidence of negligence in recording, investigating and responding to community complaints through the established reporting channels and grievance resolution mechanisms.

Work will be stopped in the event of a non-compliance, until corrective action(s) has been completed. The non-compliance will be closed out once the Project or Lodge manager has inspected the corrective action and confirmed that the issue has been satisfactorily resolved.

4.4.2 DISCIPLINARY ACTIONS

This ESMP is a legally binding document. Non-compliance with its provisions may result in disciplinary and/or legal action(s) against the responsible party or parties. These actions may include, but not limited to the following:

- Legal actions in accordance with other applicable environmental and labour laws;
- Imposition of monetary fines or penalties on contractors or subcontractors;
- Termination of contractual agreements with contractors, subcontractors or suppliers;
- Requirement for immediate corrective or remedial actions at violator's expense;
- Suspension or withdrawal of the Project approved licences and permits;
- Complete or partial suspension of Project activities until compliance is restored; or
- Disqualification from participating in future Project activities.

5 ENVIRONMENTAL AND SOCIAL MANAGEMENT

5.1 ENVIRONMENTAL PERFORMANCE MANAGEMENT

Table 4 and Table 5 provides the overall management plan of potential impacts of the Project during construction and operational phases. These plans provide mitigation and monitoring commitments, as well as the roles responsible for execution. The Project manager and Site supervisor(s) will use the construction management plan to undertake daily, weekly and monthly inspections to ensure the Project remain compliant with this ESMP during the construction phase. The operational management plan will be used by the Lodge manager and appointed Lodge supervisors to undertake inspections during the operational phase, including during routine maintenance activities and any ad hoc work as required.

This ESMP has been developed to provide guidance to the Lodge personnel, contractors and subcontractors through the different phases. This includes the following:

- **Planning phase:** planning for the construction phase by ensuring that the best available technology is procured for Project execution and operations. It also includes strategic planning for future expansion or the eventual replacement of infrastructure, equipment and services;
- **Construction phase:** the undertaking of construction activities in accordance with industry best practices to develop on-site Project infrastructure. Emphasis is placed on environmental protection and social responsibility to ensure minimal environmental disturbances and reduce impacts on neighbouring communities;
- **Operational phase:** daily management of the lodge and its associated activities; and
- **Decommissioning phase:** systematic cessation of lodge operations including implementing after-care measures following cessation of lodge operations.

5.2 PLANNING PHASE

This phase involves procuring all necessary Project materials, tools, equipment and consumables in preparation for the transition into the construction phase. Key materials such as cement, glass, wood and steel will be procured from the local markets and transported to the site for mobilisation. Fabrication is planned off-site. Materials that are not available in the local market will be imported. Contractors will be appointed to oversee the procurement process, to ensure that all Project components are acquired on schedule and that energy and water supply systems are established in line with the overall Project timeline.

The location and design of the infrastructure must harmonise with the natural environment. The Proponent is responsible for ensuring that the development does not significantly alter or detract the visual landscape and the area's sense of place.

The specific requirements required during the planning phase are discussed in Table 3.

Table 3 – Environmental aspects, management and mitigation measures for the planning phase

Aspect	Management and mitigation measures	Monitoring requirement	Responsibility
Planning phase			
Job creation, skills development and business opportunities	<ul style="list-style-type: none"> - The Proponent, contractors and subcontractors must prioritise local employment, particularly for unskilled or semi-skilled labour; - Efforts should be made to enhance and support skills development and capacity building wherever reasonably possible; and - Goods and services and consumables must be sourced from the local and regional suppliers to stimulate the local economy and promote inclusive growth. 	- Project planning phase	<ul style="list-style-type: none"> - Gondwana's human resource (HR) department - Contractors - Subcontractors
Aesthetic and visual appeal	<ul style="list-style-type: none"> - Project planning should consider the visual appeal of infrastructure to be built on-site. Efforts must be made so that the infrastructure blends in with the natural surroundings; - The use of earth colours (paints) on structures which are in harmony with the natural environment are strongly recommended; - Infrastructure development must be confined to the designated Project footprint to minimise disturbance to surrounding non-targeted areas; - Plan and design temporary on-site waste storage areas; - Avoid any neon or non-earthly toned signage that detract from the sense of place. Instead, use well-crafted wood signs. This should be considered as part of the overall Project design; and - Where feasible, plan for water pipes and power cables to be buried underground to keep them out of sight from the public and visitors. 	- Project planning phase	<ul style="list-style-type: none"> - The Proponent - Project manager
Water consumption efficiency	<ul style="list-style-type: none"> - Make arrangement and provisions to encourage guests and staff to use water sparingly. Arrange for clear signages and notices to be displayed across the lodge areas; 	<ul style="list-style-type: none"> - Project planning phase - Project lifespan 	<ul style="list-style-type: none"> - Project manager - Lodge manager - Construction team

Aspect	Management and mitigation measures	Monitoring requirement	Responsibility
	<ul style="list-style-type: none"> - Design the Project infrastructure to avoid encroachment on streams and catchment areas to avoid disturbance to natural surface water flows; - Establish a monitoring plan of water flow metering systems to track overall water consumption and promptly detect leaks and other plumbing faults; - Establish collaboration with other local water users in the broader community and any basin management committee, if one exists for coordinated water resource management in the region; and - Investigate water recycling options or alternative water-efficient systems/equipment that minimise water consumption. These should be prioritised and considered as best practices during the construction and operational phase should they be deemed applicable. 		
Wildlife management	<ul style="list-style-type: none"> - Develop an integrated wildlife management framework to forecast the impact of anthropogenic activities on free-ranging wildlife populations and their natural corridors. This framework will guide management measures aimed at conservation and promoting sustainable ecotourism; and - Ensure ongoing engagement and collaboration with the NRNR, GSNLA, MEFT's officials and the broader farming community to enhance wildlife conservation and security. 	<ul style="list-style-type: none"> - Project planning phase - Project lifespan 	<ul style="list-style-type: none"> - Project manager - Lodge manager - Gondwana's environmental department
Fire management	<ul style="list-style-type: none"> - Develop site-specific fire management and emergency response procedures; - Identify and signpost dedicated assembly points at the lodge area; - Equip lodge areas with appropriate firefighting equipment (e.g. fire extinguishers or fire hydrants); and 	<ul style="list-style-type: none"> - Project lifespan 	<ul style="list-style-type: none"> - Project manager - Lodge manager

Aspect	Management and mitigation measures	Monitoring requirement	Responsibility
	<ul style="list-style-type: none"> - Emergency contact details should be readily available on-site and updated regularly as needed. 		
Energy consumption efficiency	<ul style="list-style-type: none"> - As planned, renewable energy sources, particularly solar power, must be prioritised over diesel generators. Solar installations must be installed prior to construction to enable early energy supply and to establish solar power as the primary energy source; and - Energy-efficient devices, such as energy-saving light bulbs, must be prioritised and installed. 	<ul style="list-style-type: none"> - Project planning phase - Project lifespan 	<ul style="list-style-type: none"> - Contractors - Subcontractors
Management of solid waste	<ul style="list-style-type: none"> - Tender documents must include provision for pollution control, material substitution and promotion of recycling to ensure contractors and subcontractors compliance; - The Proponent must establish areas designated for temporary waste storage (including construction waste); - Develop a waste management plan to ensure waste is disposed of off-site, as required; and - Ensure there is provision to reuse or recycle consumables and containers that require off-site disposal. 	<ul style="list-style-type: none"> - Project planning phase 	<ul style="list-style-type: none"> - Project manager
Procurement, transport and storage of materials	<ul style="list-style-type: none"> - All the materials required for construction, namely: steel, bricks, cement, poles, roofing, etc., must be sourced from registered suppliers; - Vehicles that transport building materials to site must be road worthy; - All drivers that transport materials must have valid driver's licences and must always adhere to traffic rules and regulations; - Loads on vehicles must be properly secured to avoid them from falling off the vehicles; 	<ul style="list-style-type: none"> - Project planning phase 	<ul style="list-style-type: none"> - Delivery company employees (suppliers) - Contractors - Subcontractors

Aspect	Management and mitigation measures	Monitoring requirement	Responsibility
	<ul style="list-style-type: none"> - The materials used in the construction process for example cement, bricks, poles, etc., must be stored at a central laydown or storage area for the site to be neat and orderly; - A designated area for concrete batching must be established; - Concrete mix must not be discharged into or disposed in any water resource, catchment area or stream; - Fuels, paints, solvents and chemicals must be stored in watertight containers to ensure that they cannot react with each other or be spilled onto the ground; and - The construction team shall locate and secure sand from permitted sources outside the Project areas, as sand mining is strictly prohibited. 		

5.3 CONSTRUCTION PHASE

The construction phase will involve Project-related activities that are expected to be low-impact and less invasive. Although extensive earthworks are not anticipated, limited land clearing will be required to set up the pod's operational areas. In addition to land clearing, on-site construction will include assembling the pods prefabricated materials and structures, as well as installing supporting components such as water pipelines, drainage systems and the wastewater treatment plant. The construction of the staff lodge will include the installation of roof-mounted solar panels as part of its sustainable energy design. All Project activities will be conducted within the farm boundaries. The overall Project footprint is relatively small, and targeted mitigation measures will be undertaken to minimise the impacts on the receiving environment. Responsibility for environmental compliance during the construction phase rests with the Proponent, contractors and subcontractors, with contractors assuming overall accountability for on-site construction activities.

The Proponent must ensure that the contractors and their subcontractors are fully informed of the ESMP requirements and that these are strictly enforced throughout the construction phase. The Project manager is responsible for conducting site inspections at least once a month to ensure that all the mitigation and management measures are being properly implemented and adhered to. Upon completion of construction activities, the Project manager must conduct a final site inspection and, if satisfied that the Project has been executed in accordance with the ESMP, issue the contractors with a letter of completion which confirms compliance and satisfactory Project outcomes.

Construction activities can be associated with accidents and spillages from vehicles and generators that generate excessive noise or heat, which may lead to public concerns or negative perception. There are mitigation measures that must be implemented to minimise or prevent environmental damage, pollution or community nuisances. These mitigation measures are discussed in Table 4.

Table 4 – Environmental and social aspects, impacts, mitigation and monitoring measures for the construction phase

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
Construction phase				
Noise	- Community severance and disruption of social interactions.	<ul style="list-style-type: none"> - Provide advance notice to the farm owner, neighbouring community and conservation-focused stakeholders (NRNR and GSNLA) prior to the commencement of construction activities. The construction schedule may be communicated through direct engagement, or other appropriate engagement platform deemed suitable; - Erect a noticeboard at the Project site boundary to inform the neighbouring community about the Project and the appointed contractors and subcontractors involved; - Conduct pre-start checks on equipment; - Nighttime work is strictly prohibited (i.e. construction activities must only be conducted between dawn and dusk); - Avoid unnecessary idling of equipment and machineries; - Ensure the best available technology with low sound power is sourced; and - A complaint register must be kept. Complaints received should be addressed as per complaint handling procedures. 	<ul style="list-style-type: none"> - Daily - Weekly - Monthly 	<ul style="list-style-type: none"> - Project manager - Site supervisor - Contractors - Subcontractors
Visual	- Disruption of the visual landscape and diminished sense of place.	<ul style="list-style-type: none"> - Maintain good housekeeping throughout the construction phase; and - Equipment and machinery should only be retained on-site for the duration of the construction phase. 	<ul style="list-style-type: none"> - Daily - Weekly 	<ul style="list-style-type: none"> - Site supervisor - Contractors - Subcontractors
Occupational health and safety	- Potential for injuries or fatalities to be sustained on-site.	<ul style="list-style-type: none"> - The Project manager shall ensure that occupational health and safety requirements are incorporated into the bidding and tendering processes to guarantee that all contractors and subcontractors comply with these standards; 	<ul style="list-style-type: none"> - Daily - Weekly - Monthly 	<ul style="list-style-type: none"> - Project manager - Contractors - Subcontractors

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
Construction phase				
		<ul style="list-style-type: none"> - Contractors and subcontractors should comply with all safety requirements outlined in the contracts signed with the Proponent; - Only contractor employees with specialised skills should be assigned tasks associated with injury risks; - Construction activities should only be conducted between dawn and dusk; - The consumption of alcoholic beverages and drugs is strictly prohibited on-site. Anyone found to be under the influence of alcohol/drugs must be disciplined; - All employees must be equipped with appropriate personal protective equipment (PPE) (e.g. work overalls, hard hat, gloves, steel capped safety boots); - Conduct regular toolbox talks on occupational health and safety with all personnel involved in construction activities; - A first aid kit must always be kept on-site and must be easily accessible; - Ensure that semi-skilled workers (if employed) receive comprehensive training and clear instructions on safe handling of tools and equipment; - The Site supervisor must conduct regular site inspections to monitor compliance with safety standards (e.g. ensuring that tools are securely stored and PPE is properly worn by the workforce); and - Maintain records of all injury statistics, track corrective actions and record lessons learnt to improve safety practices on-site. 		

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
Construction phase				
Air quality	- Dust generation	<ul style="list-style-type: none"> - Ensure that all land preparation and clearing activities are limited to the defined Project footprint to avoid unnecessary environmental disturbances; - Designate a cement handling zone; - Take necessary measures to cover and secure cement bags to minimise wind-blown dust and material loss; - Project vehicles must be confined to existing roadways. No off-road driving; and - The speed limit on all construction roads and within the construction site must not exceed 40 km/h to minimise dust generation. 	- Daily	<ul style="list-style-type: none"> - Contractors - Subcontractors
Soil	- Potential for soil contamination	<ul style="list-style-type: none"> - Ensure that the 5000-litre fuel storage tank is installed as per specifications and that a consumer installation certificate is acquired from MIME; - Fuel bowzers (if kept on-site) must be equipped with drip trays during each refuelling event to prevent spills and ensure proper containment; - All fuel and chemical containers shall be stored on an impervious base, be bunded and capable of containing at least 110% of the total capacity of the storage container; - All fuel and chemical storage containers must be placed on stable ground to prevent them from tipping over or spillage; - All Project vehicles, machinery and equipment to be serviced as required to reduce the risk of oil spillage; - Major servicing of equipment should be conducted off-site; 	<ul style="list-style-type: none"> - Daily - Weekly - Monthly 	<ul style="list-style-type: none"> - Contractors - Subcontractors

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
Construction phase				
		<ul style="list-style-type: none"> - Fully stocked spill kits are to be kept on-site throughout the Project site; and - Material safety data sheets (MSDS) are to be kept of each chemical used on-site. These must be accessible to all personnel. <p>The following measures are to be implemented in response to a spill:</p> <ul style="list-style-type: none"> - Spills are to be stopped at source as soon as possible; - Spilt material is to be contained to the smallest area possible using a combination of absorbent materials, earthen bunds or containment methods; - Spilt material is to be recovered as soon as possible using appropriate equipment. In most cases, it will be necessary to excavate the underlying soil until clean soil is encountered; - Recovered contaminated soil must be disposed to an appropriate disposal facility; - The Site supervisor and Project manager are to be informed as soon as possible in the event of a spill; - A written incident report must be submitted to the Site supervisor; and - Large spills must be reported immediately to MEFT. If hydrocarbon and petroleum spills of >200 L occur, the Ministry of Industrialisation, Mines and Energy (MIME) must be informed. 		

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
Construction phase				
Water resources management	- Daily water abstraction (~10 m ³ /day) could potentially lead to a reduction in local water availability.	<p>Water required during the construction phase will be sourced from existing boreholes. The following measures must be followed:</p> <ul style="list-style-type: none"> - The existing boreholes (planned to be the main water sources for the Project) must be registered and an abstraction and water use licences must be acquired in terms of the Water Resources Management Act No. 11 of 2013 and its Regulations; - Water must be used sparingly during the construction phase. Turn off pumps when abstraction is not required; - No stagnant/pooling water; - All taps, pipes and tanks must be properly maintained and managed to prevent leaks; - Water leakages or pipe bursts should be reported and fixed as soon as possible; - Reservoirs used for temporary storage of water must be covered to reduce water loss through evaporation; and - Monitor water abstraction rates to assess actual water usage and ensure it aligns with projected demands. 	<ul style="list-style-type: none"> - Daily - Weekly - Monthly 	<ul style="list-style-type: none"> - Contractors - Subcontractors
Domestic and construction waste management	- Litter and visual nuisance.	<ul style="list-style-type: none"> - Ensure consistent and effective housekeeping is maintained on-site throughout the construction phase; - Litter generated during construction activities, such as cement bags and scrap metals must be collected and stored directly in the waste receptors; - Food waste at contractor accommodations must be securely stored in sealable waste bins to deter scavengers, for example jackals, hyenas or vultures; 	<ul style="list-style-type: none"> - Daily - Weekly 	<ul style="list-style-type: none"> - Contractors - Subcontractors

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
Construction phase				
		<ul style="list-style-type: none"> - All construction waste (either combustible or non-combustible) temporary stored on site must be stored securely in waste drums that must be disposed of off-site at an appropriate waste disposal site; - No construction waste may be burnt or buried on-site; - No paint, solvents, thinners, diesel, oil or any other harmful substances may be poured onto the ground or any drainage systems; and - Empty containers and oil filters (if used) should be removed from the site and disposed of at a suitable registered hazardous waste facility. 		
Wastewater (effluent) management	- Odours and health risks	<ul style="list-style-type: none"> - Ensure a wastewater treatment and discharge licence is obtained from the DWA prior to the construction of the trickling filter wastewater treatment plant; - Procure all necessary wastewater system components to facilitate efficient construction, effective treatment processes and reliable operations; - All ablution facilities must be flush-type toilets and must be maintained and repaired as required; - Only ablution facilities to be used; - No employee or contractor on-site may relieve himself or herself in the surrounding environment or work area; and - Ablution facilities must be cleaned regularly to maintain hygiene and prevent health risks. 	<ul style="list-style-type: none"> - Daily - Weekly - Monthly 	<ul style="list-style-type: none"> - Project manager - Site supervisor - Contractors - Subcontractors
Flora	- Potential introduction and spread of alien or	The Project site has a low vegetation density. No protected species will be removed or disturbed. However, the following precautions must be observed to maintain the ecological integrity of the site:	<ul style="list-style-type: none"> - Daily - Weekly 	<ul style="list-style-type: none"> - Contractors - Subcontractors

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
Construction phase				
	invasive plant species. - Potential removal of protected plant species in the Project area	<ul style="list-style-type: none"> - Construction activities must be confined strictly to the designated development areas to prevent unnecessary disturbance to the surrounding environment; - Conduct thorough weed inspections on all equipment, tools, machinery and delivered materials to prevent the potential introduction and spread of alien or invasive plant species; - Clearly demarcate all new gravel roads and road networks prior to construction to ensure minimal disruption to vegetation, and to maintain organised access routes; - Off-roading is strictly prohibited; - No veld fires or controlled burns are permitted at any time; and - Herbicides should not be used on-site. 		
Wildlife management	<ul style="list-style-type: none"> - Illegal hunting (poaching). - Potential to encounter and interact with wildlife on-site during the construction phase. 	<ul style="list-style-type: none"> - Poaching is prohibited. No wild animals on-site may be trapped or killed by the contractors or subcontractors workers; - Any staff members caught engaging in such an activity shall be handed over to the authorities and shall be dismissed from the contract; - Animals encountered on-site have the right of way; - Feeding wild animals is strictly prohibited, as this may disrupt their natural feeding habits; - The unauthorised use of surveillance equipment (e.g. drones) on-site is strictly prohibited; - The construction team must maintain a high level of housekeeping to prevent odours, vermin and pests; 	<ul style="list-style-type: none"> - Daily - Weekly - Monthly 	<ul style="list-style-type: none"> - Contractors - Subcontractors - Gondwana's environmental department

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
Construction phase				
		<ul style="list-style-type: none"> - All contractors and subcontractors must report any wildlife crimes to Gondwana's environmental department, which in turn must notify the relevant local conservation groups and MEFT; - No living organism should be removed from site by anyone other than a professional/registered animal handler, MEFT/MAFWLR or relevant rehabilitation or wildlife organisations (this includes the handling of snakes and dangerous wildlife); and - Project activities should be carefully managed to avoid interference with existing wildlife movement corridors. 		
Historical, archaeological and cultural heritage	- Potential damage to heritage or undiscovered archaeological finds during construction activities.	<p>Archaeological sites and objects are protected under Section 55(4) of the National Heritage Act No. 27 of 2004. Existing archaeological literatures were reviewed as part of the ESIA screening phase for the Project to gain a comprehensive understanding of the archaeological context within the NamibRand Nature Reserve. This review provided insights into the region's heritage and the best practical management measures for implementation should heritage objects or sites be discovered within the Project footprint.</p> <p>Archaeological sequences of the greater NamibRand Nature Reserve provide evidence of intermittent human occupation in the southern Namib Desert, dating approximately 100 000 years ago. These early human occupations are marked by surface scatters of crude stone tools (flake and blade tools belonging to the upper Pleistocene Middle Stone Age), a few rock painting sites, grindstones and other occupational debris found in rock shelters. Additional features include grave cairns and extensive systems of hunting blinds (ambush hunting sites). These blinds measure approximately 3 m</p>	- The duration of the construction phase	<ul style="list-style-type: none"> - Contractors - Subcontractors

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
Construction phase				
		<p>across¹. This indicate that the greater NamibRand Nature Reserve was inhabited by small, but highly mobile hunter-gatherer groups who moved across the landscape, from the interior to the coast in response to wildlife migration patterns. Wildlife migrations were seasonal, driven by the availability of good pastures, which in turn depended on rainfall events that were influenced by climatic conditions such as the Benguela Southern Oscillation (BSO)². Examples of these features can be seen in Appendix C.</p> <p>Apart from the kudu rock art reported at Vreemdelingspoort, which is approximately 20 km north of farm Draaihoek No. 119, no other significant heritage features have been identified or reported on the farm.</p> <p>Should contractors discover any surface or subsurface archaeological scatter or site be discovered within the Project area throughout the Project lifecycle, these features must be reported immediately and preserved by following these measures:</p> <ul style="list-style-type: none"> - No surface scatters or artefacts shall be collected, or damaged in any way; - Demarcate a 5 m radius of the site to prevent further encroachment of disturbance; - Should rock paintings be discovered, they must not be moved, painted over or polished; and 		

¹ Kinahan, J. (2020). *Namib: The archaeology of an African desert* (p.224). University of Namibia Press.

² Scott, A., Shaw, D., Clapham, L., Odendaal, N., & Scott, M. (2017). *A guidebook to the NamibRand Nature Reserve* (pp. 156-164). Venture Media Publisher.

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
Construction phase				
		<ul style="list-style-type: none"> - The chance find procedure (Appendix D) must be adopted and followed throughout the construction phase. 		
Security (overnight guarding of the Project site)	<ul style="list-style-type: none"> - Theft of construction materials and other related security concerns. 	<ul style="list-style-type: none"> - All contractor employees shall reside in the accommodation provided by the Proponent. The construction team is not allowed to set up overnight camps during the construction phase; - No visitors are allowed without prior approval from the Site supervisor or Project manager; and - If a security guard is required, he/she must be sourced from a formal registered security company. 	<ul style="list-style-type: none"> - Daily 	<ul style="list-style-type: none"> - Contractors - Subcontractors - Security personnel
Post construction environmental restoration	<ul style="list-style-type: none"> - Landscape degradation, visual nuisance, unrehabilitated disturbed areas. 	<ul style="list-style-type: none"> - Following the completion of construction activities, a final site inspection must be conducted across all work areas to verify that all partially disturbed areas have been restored in accordance with the requirements outlined in this ESMP; and - Contractors and subcontractors must be issued compliance certificates upon successful completion of work, provided ESMP requirements are satisfactory met. 	<ul style="list-style-type: none"> - Once-off. Final site approval exercise post-construction activities 	<ul style="list-style-type: none"> - Project manager

5.4 OPERATIONAL PHASE

This section outlines the management, mitigation and monitoring measures to be implemented during the daily operation and management of the lodge and its associated activities. To ensure eco-tourism-oriented operations, all operational activities should be guided by the following principles:

- To manage lodge operations and activities in ways that minimise disturbance to the surrounding natural environment;
- To encourage and enforce environmentally responsible behaviours amongst lodge staff and guests;
- To prioritise the conservation of the natural and human environment by integrating sustainable practices into all aspects of the lodge operations;
- To conform to eco-tourism standards and hospitality best practices;
- To foster partnership with community stakeholders (new and established conservation groups) to jointly manage natural resources and conservation initiatives; and
- To actively collaborate with regulatory authorities and stakeholders by maintaining open communication and ensuring full compliance with all Project-approved permits, licences and their conditions.

The specific environmental management measures and monitoring requirements required for implementation during the operational phase are discussed in Table 5.

Table 5 – Environmental and social aspects, impacts, mitigation and monitoring measures for the operational phase

Aspect	Potential impact	Management and mitigation measures	Monitoring requirement	Responsibility
Operational phase				
Domestic waste management	<ul style="list-style-type: none"> - Littering, visual nuisance, odours and health risks. 	<ul style="list-style-type: none"> - Implement the waste management hierarchy across the site: avoid, reuse, recycle, and then dispose of; - Maintain good housekeeping across all lodge operational areas; - Provide clearly labelled waste bins to encourage proper waste sorting by guests and staff; - Separate waste at source into categories such as organic (food waste), recyclable (plastic, paper, metal) and non-recyclable waste; - A temporary solid waste storage area must be established, and waste bins must be covered and collected periodically for disposal at an approved waste disposal site off-site; - The waste storage area must always be kept clean and tidy; - Once emptied, food waste bins must be cleaned, dried and returned to their designated areas; - Investigate the possibility of composting food waste to produce organic matter for use in landscaping activities; and - Fat trap for the kitchen grease must be emptied when full and disposed of at the designated area. 	<ul style="list-style-type: none"> - Daily - Weekly - Monthly 	<ul style="list-style-type: none"> - All lodge staff - Staff member(s) tasked with waste management duties
Wastewater (effluent) management	<ul style="list-style-type: none"> - Possible sewage discharge runs. - Leakage and seepage of effluent into 	<ul style="list-style-type: none"> - Ensure compliance with the permit conditions issued for the trickling filter wastewater treatment plant, particularly with regards to effluent discharge, reuse, sampling and reporting to DWA (if required); - All sewage waste to be treated to general standards (Annexure 11 of the Water Resources Regulations of 2023), unless determined 	<ul style="list-style-type: none"> - Daily - Weekly - Monthly - Annually 	<ul style="list-style-type: none"> - Lodge manager - Lodge supervisor - Lodge maintenance team

Aspect	Potential impact	Management and mitigation measures	Monitoring requirement	Responsibility
Operational phase				
	water resources. - Odours and disease transmissions.	otherwise by DWA in the approved wastewater treatment, effluent discharge and reuse licence conditions; - No employee may relieve himself or herself in the surrounding environment; - Use biodegradable toilet cleaners that do not impact on the microbial activities required for effective wastewater treatment processes; - Develop a wastewater inspection schedule covering all drainage systems and components of the waste treatment plant to ensure malfunctions are timely detected and repaired; and - Conduct regular training and refresher courses with the maintenance team on environmental regulations, operational procedures and emergency protocols to ensure effective management and monitoring of the facility.		
Groundwater resources management	- Potential lowering of the water table as a result of daily water abstraction (10 m ³ /day). - Improper water usage.	- An abstraction and water use licence should be in place as required under section 44 of the Water Resources Management Act No. 11 of 2013; - Ensure compliance with all licence conditions and reporting requirements (if required) and renew the licence within the required timeframe; - Turn off pumps when abstraction is not required; - Adopt a water-wise mindset on-site (e.g. encourage guests and lodge staff to take short showers); - Monitor irrigation systems to ensure water is used sparingly;	- Daily - Weekly - Monthly - Annually	- All lodge staff - Guests at the lodge - Maintenance team

Aspect	Potential impact	Management and mitigation measures	Monitoring requirement	Responsibility
Operational phase				
		<ul style="list-style-type: none"> - Develop a monitoring plan for all water pipelines to ensure leakages are detected timely and fixed; and - Record (daily) flow meter readings from all metering systems to monitor and track water usage. 		
Biodiversity management	<ul style="list-style-type: none"> - Interaction with biodiversity. - Potential introduction and spread of alien or invasive species. 	<p>The Nature Conservation Ordinance Act No. 4 of 1975 and its Regulations, Controlled Wildlife Products and Trade Act No. 9 of 2008 and the Animal Protection Act No. 71 of 1962 must be closely followed with regards to any encounters with wildlife within the site boundaries. In addition to this, the following measures must be complied with:</p> <ul style="list-style-type: none"> - Incorporate indigenous plants into the landscaping design; - Feeding wild animals or deliberately interacting with them is strictly prohibited; - Off-road driving is strictly prohibited; - Poaching, possession and consumption of game and game products is strictly prohibited; - Wild animals encountered on-site or within the lodge operational areas have the right of way; - Set site specific speed limits (ideally 40 km/h) and ensure that appropriate road signages are clearly erected; - Collaborate with regulators, conservation authorities in joint wildlife management efforts; - Police and MEFT should be notified of any wildlife crime incidents; 	<ul style="list-style-type: none"> - Daily - Weekly - Monthly - Annually 	<ul style="list-style-type: none"> - Lodge manager - All lodge staff - Guests at the lodge

Aspect	Potential impact	Management and mitigation measures	Monitoring requirement	Responsibility
Operational phase				
		<ul style="list-style-type: none"> - Bird nests discovered on infrastructure should not be removed or destroyed; and - Invasive plant species should be removed, and their spread should be prevented. 		
Historical, archaeological and cultural heritage	<ul style="list-style-type: none"> - Potential damage to heritage or undiscovered archaeological finds during the operational phase. 	<ul style="list-style-type: none"> - In the event that heritage objects or sites are discovered, the chance find procedure (Appendix D) must be adopted and followed. 	<ul style="list-style-type: none"> - Project lifespan 	<ul style="list-style-type: none"> - All staff
Visitor's relations and management	<ul style="list-style-type: none"> - Violation of the commitments outlined in this ESMP. 	<ul style="list-style-type: none"> - All lodge visitors are expected to abide by the information/notices conveyed to them for the duration of their stay at the lodge; - Visitors are not allowed to feed or deliberately interact with any wild animals; - Visitors are expected to drive responsibly when travelling to and from the lodge, with consideration of wildlife and other road users; and - Engage in proper waste management practices (e.g. dispose waste in the provided waste bins). 	<ul style="list-style-type: none"> - Daily 	<ul style="list-style-type: none"> - All lodge visitors
Career uplifting opportunities	<ul style="list-style-type: none"> - Skills development. 	<ul style="list-style-type: none"> - Engage in general environmental awareness, skills empowering, career advancing workshops and training (e.g. first aid training, hospitality, technical and software skills training). 	<ul style="list-style-type: none"> - Ad hoc basis 	<ul style="list-style-type: none"> - Lodge manager - Lodge staff

Aspect	Potential impact	Management and mitigation measures	Monitoring requirement	Responsibility
Operational phase				
Community relations	<ul style="list-style-type: none"> - Commitment to ethical employment practices. - Strong working relationship with the neighbouring farming community, conservation groups, key stakeholders and regulatory authorities. 	<ul style="list-style-type: none"> - The Proponent and Lodge manager must represent the Project by maintaining good working relations with the surrounding communities, conservation groups (i.e. NRNR and GSNLA), external auditors and regulatory authorities; - The Proponent shall actively participate in conservation-focused initiatives, water resources management forums and other related environmental conservation or ecological restoration efforts; - Ensure that cultural or archaeological objects and sites (if discovered or unearthed) are not damaged and are reported to NHC; - Ensure that local community members are prioritised for employment opportunities; - Ensure resources are in place to ensure all lodge staff participate in regular training and refresher courses to enhance their skills, knowledge and overall competence; and - Ensure deserving candidates are promoted to leadership roles. 	<ul style="list-style-type: none"> - Ad hoc basis 	<ul style="list-style-type: none"> - The Proponent - Lodge manager

5.5 DECOMMISSIONING PHASE

The decommissioning phase follows the operational phase. This section provides a site-specific plan developed to ensure that appropriate environmental and management practices are followed during the decommissioning phase of the Project. The section also outlines detailed remediation; site control and monitoring activities that will be conducted once lodge infrastructure are no longer required.

The decommissioning phase:

- Provide effective and implementable site-specific procedures and mitigation measures to monitor and manage environmental impacts throughout the decommissioning phase of the Project. These measures aim to minimise the likelihood and extent of post-decommissioning impacts;
- Establish a long-term management plan for the Project site to ensure its effective transition to its next intended use;
- Aims to eliminate the long-term liability issues and reduce the likely occurrence of irreversible impacts post site closure; and
- Provide a platform for the Proponent to engage/collaborate with local communities, stakeholders and regulatory authorities in the planning and implementation of decommissioning activities, including the disposal of waste, building remnants and post-closure care requirements.

Prior to the implementation of any decommissioning or closure measure, a thorough investigation into potential alternative end uses of the site must be conducted. This will ensure that opportunities for sustainable land use and appropriate ecological restoration measures are fully considered and effectively integrated into the overall site closure strategy.

The decommission phase or site closure is yet to be determined. However, should this be required or determined for any reason, the following general conditions outlined in Table 6 shall be followed and implemented, as best practice measures.

Table 6 - Rehabilitation plan for the Project

Aspect	Management measures required	Responsibility
Tools and equipment	<ul style="list-style-type: none"> - All fuel containers must be removed, and any hydrocarbon stains within lodge work areas must be promptly and thoroughly cleaned up; and - Ensure all hand and power tools are cleared from site prior to site closure. 	<ul style="list-style-type: none"> - Lodge manager - Contractor - Maintenance team
Wastewater management systems	<ul style="list-style-type: none"> - All drainage systems, wastewater pipes and components of the wastewater treatment facility must be disconnected, dismantled and safely disposed offsite at an approved waste disposal facility or wastewater treatment works; and - Ensure all wastewater is properly drained (i.e. no pooling shall remain on-site upon closure). 	<ul style="list-style-type: none"> - Lodge manager - Contractor - Maintenance team
Building remnants, scrap metals etc.	<ul style="list-style-type: none"> - All infrastructure must be demolished to ensure there will be no free-standing structures; and - Building remnants should be disposed offsite at the waste disposal site. 	<ul style="list-style-type: none"> - Lodge manager - Contractor - Maintenance team
Solid waste management	<ul style="list-style-type: none"> - All solid waste generated must be handled in accordance with the site waste handling procedures; and - No waste may be buried on-site. 	<ul style="list-style-type: none"> - Lodge manager - Contractor - Maintenance employees
Gravel roads	<ul style="list-style-type: none"> - Dis-used roads and site access roads must be rehabilitated to enhance the aesthetic value of the site. 	<ul style="list-style-type: none"> - Lodge manager - Contractor - Maintenance employees

Aspect	Management measures required	Responsibility
Site closure	<ul style="list-style-type: none"> - Conduct a final site inspection with the representatives of the conservation groups (i.e. NRNR and GSNLA), farm owner and / or regulatory authorities (MEFT or MAFWLR) to verify satisfaction with decommissioning outcomes; and - Once approval is granted, a satisfaction letter or certificate must be issued to the Proponent by the relevant regulatory or conservation representatives. 	<ul style="list-style-type: none"> - Lodge manager - NRNR and GSNLA representatives - Regulatory authorities - Farm owner

6 PROPERTY LEASE, TRANSFER OR CESSATION OF THE JOINT VENTURE PARTNERSHIP

In the event that lodge operations cease due to a transfer of ownership, lease of the property or cessation of the joint venture partnership (whether upon Project completion or by mutual consent), the incoming owner is required to comply fully with all conditions outlined in this ESMP. At this stage, should infrastructure be removed, it is recommended that the Proponent implement a comprehensive rehabilitation plan to restore the site to its natural and ecological state, as far as reasonably practicable. This will prevent further environmental degradation and prepare the land for its next intended use.

7 IMPLEMENTATION OF THE ESMP

This ESMP:

- A. Has been prepared pursuant to the contract with the Proponent;
- B. Has been prepared on the basis of information provided to ECC up to June 2025;
- C. Is for the sole use by the Proponent, lodge employees, contractors and subcontractors during the construction and operational phase;
- D. Must not be used by any person other than (1) the Proponent (2) Contractors and subcontractors; and
- E. Must not be copied without the prior written permission of ECC.

APPENDIX A – LODGE TECHNICAL DRAWINGS

APPENDIX B – FOCUS GROUP MEETING MINUTES AND STAKEHOLDER'S CONSENT LETTERS

APPENDIX C – EXAMPLES OF HERITAGE FEATURES RECORDED IN THE BROADER NAMIBRAND NATURE RESERVE



APPENDIX D - CHANCE FIND PROCEDURE

This section covers the procedures, reporting and management of sites or items of heritage significance should they be discovered, encountered or unearthed within the lodge operational areas.

Scope: The "chance finds" procedure covers the actions to be taken from the discovery of a heritage site or item to its investigation and assessment by a trained archaeologist or other appropriately qualified person.

Compliance: The "chance finds" procedure is intended to ensure compliance with relevant provisions of the National Heritage Act No. 27 of 2004, especially Section 55 (4) which states that: "a person who discovers any archaeological object must as soon practicable possible report the discovery to the Council". The procedure of reporting set out below must be observed so that heritage remains reported to the National Heritage Council (NHC) are correctly identified in the field.

Responsibilities

Contractors/employees – to exercise due caution if archaeological remains are discovered.

Lodge supervisor(s) – to secure the site and advise management timeously.

The Lodge manager – to determine safe working boundaries and request for inspection.

Archaeologist – to inspect, identify, advise management and recover remains.

Table 7 provides the environmental risks and issues, mitigation and monitoring measures for archaeological and heritage aspects.

Table 7 - Archaeological and heritage aspects

Responsibility:	<ul style="list-style-type: none"> – The Lodge manager, Lodge supervisor(s), Lodge employees, contractors and subcontractors
Potential issues or impacts:	<ul style="list-style-type: none"> – Impact on heritage features.
Management /mitigation measures	
Potential to unearth heritage objects or resources	<ul style="list-style-type: none"> – All lodge personnel and contractors should be aware of the protected archaeological site and the legal obligation to report any new findings to the National Heritage Council (NHC) immediately. <p>Should a heritage site or archaeological site be uncovered or discovered particularly during the construction or operational phase, a chance find procedure should be applied in the order they appear below:</p> <ul style="list-style-type: none"> – If operating machinery or equipment, stop work; – Demarcate the site with danger tape;

	<ul style="list-style-type: none"> - Determine GPS position if possible; - Report findings to the Lodge supervisor; - Report findings, site location and action taken to the Lodge manager; - Cease any works in the immediate vicinity; - Visit the site and consult any potentially affected community to determine whether work can proceed without damage to the findings; - Determine and demarcate the exclusion boundary; - Site location and details to be added to the Project's geographic information system (GIS) for field confirmation by an archaeologist; - Inspect the site and confirm addition to the Project GIS; - Advise the NHC and request written permission to remove findings from work area; and - Recover, package and label findings for transfer to the National Museum.
	<p>Should human remains be found, the following actions must be followed:</p> <ul style="list-style-type: none"> - Apply the chance find procedure as described above; - Schedule a field inspection with an archaeologist to confirm that the remains are human; - Advise and liaise with the NHC and Police; and - Remains will be recovered and removed to either the National Museum or the National Forensic Laboratory.