



GONDWANA
COLLECTION
NAMIBIA

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REPORT:

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN FOR CANYON LODGE

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ABBREVIATIONS

Abbreviation	Description
%	percentage
>	greater than
APU	anti-poaching unit
DEAF	Department of Environmental Affairs and Forestry
DWA	Department of Water Affairs
DWNP	Directorate of Wildlife and National Parks
EAP	environmental assessment practitioner
ECC	Environmental Compliance Consultancy (Pty) Ltd
ERP	Elephant Rhino People Namibia
EMA	Environmental Management Act, No. 7 of 2007
EMP	environmental management plan
ESI	Environmental and Social Impact department
ESMP	environmental and social management plan
FRC	Fish River Canyon
GCN	Gondwana Collection Namibia (Pty) Ltd
GCT	Gondwana Care Trust
GIS	geographic information system
GCP	Gondwana Canyon Park
Gondwana	Gondwana Collection Namibia (Pty) Ltd
GPS	geographic positioning system
ha	hectare

Abbreviation	Description
i.e.	that is
km	kilometre
kVa	kilovolts amperes
km/h	kilometre per hour
L	litre
Ltd.	limited
MAFWLR	Ministry of Agriculture, Fisheries, Water and Land Reform
MEFT	Ministry of Environment, Forestry and Tourism
MIME	Ministry of Industries, Mines and Energy
MLIREC	Ministry of Labour, Industrial Relations and Employment Creation
MSDS	material safety data sheet
NHC	National Heritage Council
NTB	Namibia Tourism Board
NamPower	Namibia Power Corporation
NE	northeast
PPE	personal protective equipment
Pty	proprietary
SW	southwest

1 INTRODUCTION

1.1 LODGE BACKGROUND

Environmental Compliance Consultancy (Pty) Ltd (ECC) has been engaged by Gondwana Collection Namibia (Pty) Ltd (GCN) (herein referred to as "Gondwana" or "the Proponent") to revise and update the environmental management plan (EMP) of 2017 to an environmental and social management plan (ESMP) and compile the environmental clearance certificate renewal application for the continued management and operation (operational phase) of Canyon Lodge, located within the Gondwana Canyon Park (GCP) in the !Kharas Region, Namibia.

Canyon Lodge is located approximately 155 km southwest (SW) of Keetmanshoop and can be accessed via the C37 gravel road (Figure 1). The renowned Fish River Canyon (FRC) lies approximately 20 km northeast (NE) of the lodge. The privately owned GCP is a wildlife conservation area and covers an area of approximately 126 000 hectares (ha).

1.2 CURRENT LODGE OPERATIONS

The lodge currently comprises of thirty (30) natural stone-built chalets (twenty-eight (28) twin chalets and two (2) family chalets). Supporting infrastructure includes the following: the reception block with a curio shop, administration offices, ablution facilities, a bar, kitchen, restaurant, swimming pools, laundry rooms, workshop, management houses and staff accommodation.

The GCP is a vast conservation region, with abundant free-roaming wildlife populations. The region's unique landscape and renowned landmarks present opportunities for a range of recreational activities. In addition to accommodation, the lodge offers a range of recreational activities. This includes:

- Guided morning/afternoon excursions to the FRC;
- Guided sunset/sundowner drives through Gondwana Canyon Park;
- Guided hike excursions;
- Guided night walks; and
- Semi and self-guided activities such as sunset walks on established walking trails, hiking trails and self-drives through the Gondwana Canyon Park.

The lodge is connected to the NamPower Kharas T-off substation. Supplementary energy is supplied by ground-mounted solar arrays. A 120 kilovolts amperes (kVa) back-up diesel generator is also in place in the event of a power outage.

The water required for different lodge operational activities is sourced from existing groundwater boreholes and is pumped to different work areas through a network of water supply pipelines.

Wastewater is collected through a conventional gravity-fed sewage system and directed to a trickling filter wastewater treatment plant, where it is treated to reduce environmental contamination. The water is then reused in the garden.

Different waste types generated as a result of lodge operations are collected at a temporary waste storage area and segregated into categories, such as recyclable waste and reusable waste, then removed and disposed of off-site at a registered waste disposal site.

1.3 ENVIRONMENTAL REGULATORY REQUIREMENTS

Tourism development activities are listed activities under the Environmental Management Act, No. 7 of 2007 (EMA) and its 2012 Regulations. As such, an environmental clearance certificate must be obtained from the Department of Environmental Affairs and Forestry (DEAF) to ensure that the lodge operations remain compliant with applicable environmental legislations, standards and best practices. In addition to this, the lodge is required to be registered with the Namibia Tourism Board (NTB). In accordance with the Water Resources Management Act, No. 11 of 2013 and its Regulations of 2023, the lodge is required to obtain licences from the Department of Water Affairs (DWA) for the abstraction and use of water from existing boreholes, as well as a wastewater treatment, effluent discharge and reuse licence. This ESMP has been revised and updated in terms of the requirements of the EMA and its 2012 Regulations.

The environmental clearance certificate for lodge was issued by the Ministry of Environment, Forestry and Tourism (MEFT) on 08 June 2017 and expired on 08 June 2020. This ESMP is submitted to MEFT for approval as part of the environmental clearance certificate renewal application.

The lodge currently does not have abstraction and water use licences. The lodge requires these licences to remain compliant with the Water Resources Management Act, No. 11 of 2013 and its Regulations of 2023.

The lodge also currently does not have a wastewater treatment, effluent discharge and reuse licence for its wastewater treatment processes and reuse of treated domestic waste. The licence is required to ensure compliance with the Water Resources Management Act, No. 11 of 2013 and its 2023 Regulations.

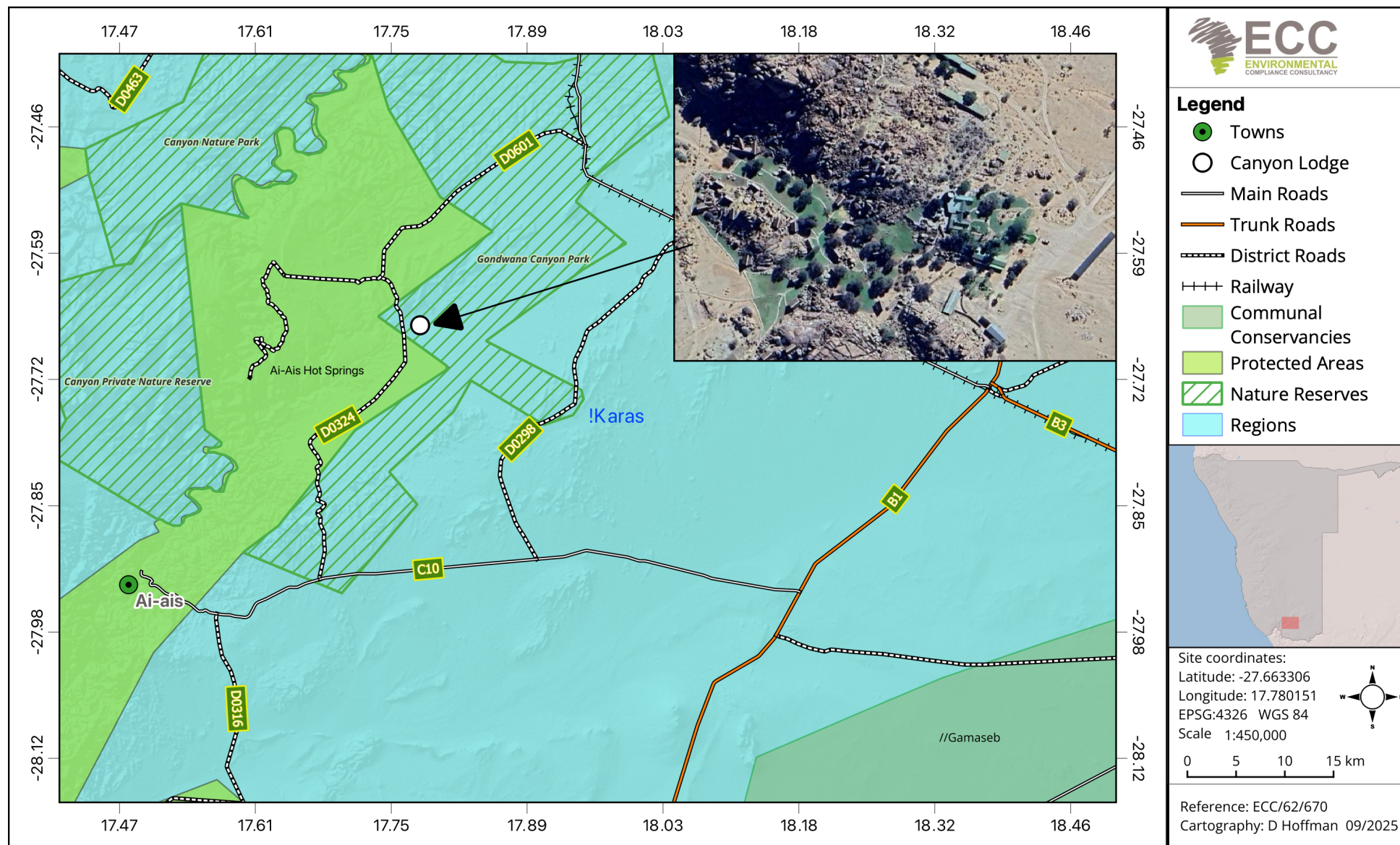


Figure 1 - Location of Canyon Lodge

1.4 PURPOSE OF THIS REPORT

This ESMP provides a logical framework, mitigation measures, management strategies and monitoring requirements for the lodge operations and 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 pre-determined intervals, 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 any appointed contractor and their subcontractors will be legally required to comply with the requirements set out in this ESMP, once approved by MEFT (the competent authority), along with the renewal of the environmental clearance certificate for the lodge.

1.5 MANAGEMENT OF THIS ESMP

Gondwana's Environmental and Social Impact (ESI) department and management of Canyon Lodge will hold the environmental clearance certificate for the Lodge 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 lodge staff and appointed contractor(s) 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, Lodge approval conditions, permits, certificates, 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 current lodge operational activities. When the design or operations method changes, this ESMP will need to be updated, and additional assessment may be required.

1.7 ENVIRONMENTAL ASSESSMENT PRACTITIONER (EAP)

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

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2 ENVIRONMENTAL MANAGEMENT FRAMEWORK

2.1 OBJECTIVES AND TARGETS

The lodge is in a pristine ecological environment, with abundant wildlife populations. To minimise and mitigate potential negative environmental and social impacts, specific environmental objectives and targets have been developed. These have been developed to ensure that all lodge 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 Lodge are as follows and must align with Gondwana's strategic corporate environmental and social objectives:

- Manage waste efficiently and reduce the potential for environmental pollution;
- Use natural resources effectively and efficiently;
- Alignment with established environmental policies and guidelines (i.e. policies developed for the GCP);
- Resolve complaints received from the surrounding community through effective grievance resolutions mechanisms;
- Minimal interruptions and interactions with wildlife populations, their home ranges and natural corridors; and
- Engage in eco-tourism programs and best environmental practices throughout the Lodge's lifespan.

2.2 ORGANISATIONAL STRUCTURE, ROLES AND RESPONSIBILITIES

The Proponent shall be responsible for:

- Ensuring that all lodge staff members, any appointed contractor, 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 the Lodge operational and decommissioning phases;
- Keeping records of environmental incidents, corrective actions, training and induction activities for audit and reporting purposes;
- Promoting a culture of environmental awareness and accountability among all staff and visitors through ongoing communication and engagement; and
- Upholding the Lodge's reputation by ensuring timely reporting of environmental incidents to the relevant authorities.

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

Table 1 - Lodge team roles and responsibilities

Role	Responsibilities and duties
Proponent (Gondwana)	- Responsible for the overall management and implementation of this ESMP; - 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	- Responsible for overseeing and supervising lodge operations and ensuring compliance with this ESMP; - Ensure all personnel are aware of the commitments made in the ESMP and statutory licence conditions; - 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 Lodge scope or other relevant developments; - Ensure adequate resources are made available for lodge staff to effectively implement commitments outlined in this ESMP; - Schedule environmental awareness/management training and inductions for all employees; - Ensure that best environmental practices are implemented throughout the Lodge lifecycle; - Receiving, recording and responding to community complaints; and - Report any non-compliance or accidents to stakeholders and regulatory authorities (e.g. MEFT, Ministry of Agriculture, Fisheries, Water and Land Reform (MAFWLR), Ministry of Labour Industrial Relations and Employment Creation (MLIREC), MIME and National Heritage Council (NHC)).
Lodge supervisor(s)	- Overseeing the execution of operational activities carried out by personnel under their supervision to ensure works remain compliant to this ESMP; - Report any non-compliance or accidents to the Lodge manager; and

Role	Responsibilities and duties
	- Allocating adequate resources lodge personnel to promote a safe and healthy working environment.
Lodge employees, contractors and subcontractors	Responsible to comply with this ESMP throughout the Lodge lifecycle, in addition to: - Demonstrating an understanding of the ESMP, including its content and requirements; - Attending briefings, training and toolbox talks on specific environmental matters; - Report any operational activities that deviate from the ESMP; and - Timely implement corrective or remedial actions as directed by the Lodge manager or Lodge supervisors.
Gondwana's Environmental and Social Impact Department	- Ensure that lodge staff are adequately and regularly trained on environmental topics and are fully aware of potential risks and impacts, including those arising from changes in technology and working environment; - Responsible for reviewing environmental legislation, policies and regulations to ensure lodge operations align with changes to these policies and amendments thereof; - Ensure that this ESMP is updated regularly or as required to ensure lodge operations align with statutory requirements and best environmental practices; and - Conduct regular site inspections to assess the level of compliance with this ESMP.

2.3 CONTRACTORS AND SUBCONTRACTORS

Contractors and their subcontractors contracted by the Proponent for any mechanical or maintenance repairs during the operational phase 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 Gondwana's Environmental and Social Impact department, Lodge manager and Lodge supervisors;

- Cooperate fully with environmental inspections, audits and monitoring activities conducted by Gondwana's Environmental and Social Impact department, 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 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.

Gondwana must 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:

- All Lodge personnel shall be provided with the necessary and appropriate personal protective equipment (PPE) (i.e. overalls, safety boots and proper uniform);
- Should foreign workers be hired, the Proponent shall ensure that they have valid work permit(s) at all times;
- Occupational health and safety protocols are to be enhanced throughout the Lodge lifecycle;
- Regular refresher training courses shall be conducted to reinforce health and safety and environmental responsibilities; and
- All Lodge personnel shall undergo an induction course covering environmental awareness, occupational safety procedures and site-specific risks and impacts before commencing work.

2.5 EMPLOYMENT

Gondwana's People Team (Human Resources) department must comply with the following:

- Ensure that their recruitment mechanisms prioritise local people;
- Job adverts must clearly state the 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, assigned duties and hourly remuneration (in accordance with the wage standards stipulated in the Wage Order Setting the National Minimum Wage for Employees (Government Notice 218 of 2024).

3 COMMUNICATION AND AWARENESS

To ensure potential environmental impacts are minimised, it is important that lodge 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 tourism operators, neighbouring parks, NHC, MEFT, MIME, MLIREC and MAFWLR). This section outlines the framework for communication related to the implementation of the commitments that are specified in this ESMP.

3.1 INTERNAL COMMUNICATION

The Lodge manager and Lodge supervisor(s) shall communicate site-wide environmental issues to the lodge team through the following means (as and when required):

- Site notices;
- WhatsApp group (or preferred social communication mobile application tool);
- Daily, weekly and monthly briefings;
- Instructions on incident response procedures; and
- Briefing on key social and environmental issues.

This ESMP shall be distributed to the lodge team (including contractors and subcontractors, when hired for any maintenance, mechanical repairs or lodge upgrade work) 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, in English and their local language, where required.

Effective communication must be maintained and should include procedures for receiving, logging and resolution of complaints, the non-conformances with this ESMP observed and remediation/corrective actions required.

3.1.1 TRAINING AND ENVIRONMENTAL AWARENESS

All lodge personnel must be competent to perform tasks to avoid potential negative 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 Lodge supervisor(s) must ensure records of these training sessions are always kept on-site and filed.

3.2 EXTERNAL COMMUNICATION

The Lodge manager shall represent the Lodge and shall liaise with external regulatory authorities (e.g. MEFT, NTB, NHC, MLIREC, MIME and MAFWLR), neighbouring parks (e.g. Ais-Ais National Park), nature conservation organisations (e.g. Elephant Rhino People Namibia (ERP)) and community representatives. This will ensure good working relations with the stakeholders and compliance with all relevant policies, regulations, Lodge approved licences, certificates 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 a site, but where functional resources can manage the response. An emergency response plan must be in place by the Proponent 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	Fire brigade
Keetmanshoop	+264 63 223388	+264 63 221800	+264 63 221211

All wildlife crimes must be promptly investigated and reported to MEFT through the Directorate of Wildlife and National Parks (DWNP). ERP must also be informed about any rhino poaching incident.

Should there be large-scale fuel spills (i.e. > 200 litres), the Ministry of Industries, Mines and Energy (MIME) must be notified by completing form PP/11 (telephone: +264 61 284 8111).

Should there be large-scale domestic effluent spills into any river course or tributary river, DWA must be promptly informed, since the lodge is in close proximity to the Kanebis River.

3.2.2 COMPLAINT HANDLING AND RECORDING

Any complaints received verbally by any lodge personnel 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 who is overall responsible for managing complaints. The Lodge 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 lodge team 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 Lodge 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 operational and decommissioning phase of the Lodge. It details procedures to ensure routine inspections and audits are conducted to ensure that Lodge's activities are aligned and remain compliant with this ESMP.

4.2 OPERATIONAL PHASE: ENVIRONMENTAL INSPECTIONS AND COMPLIANCE MONITORING

An audit and inspection program must be in place to ensure effective operational performance. For example, the wastewater treatment facility, 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 potential groundwater contamination is detected and addressed timely. The maintenance team (i.e. artisans and mechanics) will conduct these routine inspections.

The Lodge manager will conduct regular inspections of all lodge infrastructure and work areas to ensure compliance with operational specifications and identify any signs of wear, damage or 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(s) taken and any necessary follow up measures required.

4.3 REPORTING

All incidents or non-compliances, including environmental issues, wildlife crimes, failure of equipment or accidents, are to be reported to the Lodge manager throughout the Lodge's lifecycle. MEFT reserves the right to require the Proponent to submit bi-annual reports evaluating the Lodge's compliance with the commitments that are outlined in this ESMP. Wildlife crimes, for example the poaching of rhinos must be reported to the local conservation groups (ERP) and MEFT must be notified through the DWNP.

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 MIME must be notified by completing form PP/11 (telephone: +264 61 284 8111).

If significant environmental spills (hydrocarbons or domestic effluent) occur close or in a water source, the DWA is to be notified. All correspondence with DWA must be done by the Lodge manager no later than 48 hours after the incident has occurred. All correspondence with the

relevant ministries should be by the Lodge manager or Gondwana's Environmental and Social Impact department.

The lodge's water abstraction volumes must be reported to DWA, either monthly or quarterly. The frequency of reporting will be determined by DWA under the abstraction and water use licences.

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 by lodge staff during operations must 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 are discovered on-site, the chance find procedure (Appendix A) must be followed and the NHC must be informed by the Lodge manager.

The Lodge manager must ensure that the final domestic effluent complies with general standards (Annexure 11) of the Water Resources Management Regulations (2023) and that all water quality analysis and reporting requirements specified in the licences for the proposed activities are fully met, should this be required by DWA. Gondwana's Environmental and Social Impact department is also required for monitoring compliance with the licence conditions and ensure renewal requirements are tracked and met.

All correspondence and communication with neighbouring parks, researchers, nature conservation groups, local and regulatory authorities should be undertaken by the Lodge manager and Gondwana's Environmental and Social Impact department.

4.4 ENVIRONMENTAL LICENCES AND CERTIFICATES

Table 3 outlines the licences and certificates that are required for the Lodge operational phase.

Table 3 – Licence, certificate and authorisation required for the Lodge operational phase

Licence or certificate	Relevant authority	Related activity requiring permit	Act/Regulation/Policy
Waste water treatment, effluent discharge and reuse licence	DWA	Required for the treatment and discharge of domestic waste	Water Resources Management Act, No. 11 of 2013

Licence or certificate	Relevant authority	Related activity requiring permit	Act/Regulation/Policy
Abstraction and water use licences	DWA	Required for the abstraction of water from groundwater boreholes and water use during lodge operations	Water Resources Management Act, No. 11 of 2013
Environmental clearance certificate	DEAF	Required to undertake the listed activities associated with the lodge operations	Environmental Management Act, No. 7 of 2007
Authorisation to keep domestic pets at the lodge	DWNP	An exemption is required to comply with the provisions outlined in the Gondwana Canyon Park Policy	Gondwana Canyon Park Policy
National Heritage Council consent	NHC	NHC consent for the management and preservation of heritage objects, if discovered within the Lodge's footprint	National Heritage Act, No. 27 of 2004

4.4.1 NON-COMPLIANCE

Where it has been identified that activities are not compliant with this ESMP, the 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 inspections of the different service areas 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;
- Lodge staff fail to comply with corrective actions or other instructions issued to them by the Lodge manager, Lodge supervisors 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.

Depending on severity, 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 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;
- Suspension or withdrawal of the Lodge approved licences and certificates;
- Complete or partial suspension of operations until compliance is restored; or
- Disqualification from participating in future tourism activities.

5 ENVIRONMENTAL AND SOCIAL MANAGEMENT

5.1 ENVIRONMENTAL PERFORMANCE MANAGEMENT

Table 4 and Table 5 provides the overall management plan of potential Lodge impacts during the operational and decommissioning phases. These plans provide mitigation and monitoring commitments, as well as the roles responsible for execution. The Lodge manager and appointed Lodge supervisor(s) will use the operational management plan to undertake daily, weekly and monthly inspections to ensure the Lodge remain compliant with this ESMP during operations and to manage any ad hoc activities.

This ESMP has been revised and updated to provide clear guidance to the Lodge personnel and any appointed contractor and subcontractor throughout the operational and decommissioning phase. Specifically, it covers:

- **Operational phase (current phase):** the day-to-day management of the lodge and its associated activities, including mechanical and maintenance activities; and
- **Decommissioning phase (future phase):** the systematic cessation of lodge operations, including the implementation of appropriate after-care measures following cessation of lodge operations.

5.1.1 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 practices are enhanced, 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 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 (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 Lodge-approved certificates, licences and their conditions.

The specific environmental management measures and monitoring requirements required for implementation during the operational phase are discussed in Table 4.

Table 4 – Environmental aspects, management and mitigation measures for the operational phase

Aspect	Potential impact	Management and mitigation measures	Monitoring requirement	Responsibility
Operational phase				
Environmental awareness	- Environmental grievances and misconducts due to a lack of awareness.	- Keep environmental policies and guidelines on file; - Ensure environmental awareness posters are displayed across different lodge areas and staff quarters; - Ensure the ESMP is revised as required to align with the provisions outlined in environmental policies, regulations and their amendments thereof; - Ensure staff are inducted on environmental matters and receive regular training to ensure they understand the requirements of the ESMP; and - Ensure roles and responsibilities of various staff members are clearly spelt out in their job descriptions.	- Ad hoc	- HR department - Gondwana's Environmental and Social Impact department
Corporate social responsibility and stakeholder engagement	- Good community relations.	- Collaborate with nature conservation groups, neighbouring parks, partners and researchers in the management of wildlife populations; - Support local communities through the Gondwana Care Trust (GCT); and - Participate in community programs (e.g. infield clean-up campaigns).	- Ad hoc	- Gondwana's Environmental and Social Impact department - All lodge staff
Groundwater resources management	- Potential lowering of the water table as a result of daily water abstraction.	- Abstraction and water use licences 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;	- 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				
	- Improper water usage.	- 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; - Develop a monitoring plan for all water pipelines to ensure leakages are detected timely and fixed; - As per the current schedule, test water quality every six (6) months; and - Record (daily) flowmeter readings from all metering systems to monitor water usage and address irregular trends.		
Handling, storage and dispensing of hydrocarbon containers, maintenance of equipment, machinery and vehicles	- Soil contamination. - Visual nuisance. - Surface and groundwater contamination.	Hydrocarbon management requirements: - Maintain good housekeeping; - All lodge vehicles, equipment and machinery must be serviced and repaired at the designated workshop; - All fuel and chemical containers must 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 a spillage; - Fully stacked appropriate spill kits are to be kept on-site; and - MSDSs are to be kept of each chemical used on-site. These must be accessible to all personnel and personnel must be trained therein.	- Daily - Weekly - Monthly - Annually	- All lodge staff - Appointed fuel attendants

Aspect	Potential impact	Management and mitigation measures	Monitoring requirement	Responsibility
Operational phase				
		Spill response measures: The following measures are to be implemented in response to a spill: - 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 Lodge manager and Lodge supervisors are to be informed as soon as possible in the event of a spill; - A written incident report must be submitted MIM for significant spillages; and - Large hydrocarbon spills (i.e. > 200 L) must be reported immediately to MEFT and DWA, if it enters the Kanabis River course or its tributaries. If the spillage is of a fuel source (i.e. petrol/diesel), the MIM must be notified by completing form PP/11 (telephone: +264 61 284 8111).		
Biodiversity management	- Interaction with biodiversity. - Potential introduction	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	- Daily - Weekly - Monthly - Annually	- Lodge manager - Park wardens - Guests at the lodge

Aspect	Potential impact	Management and mitigation measures	Monitoring requirement	Responsibility
Operational phase				
	and spread of alien or invasive species. - Poaching, - Bird collision into the solar power plant.	any encounters with wildlife within the site boundaries. In addition to this, the following measures must be complied with: Vegetation: - Incorporate indigenous plants into the landscaping and ornamental design and ensure that no alien invasive species are introduced; - Ensure the continued implementation of the “Adopt-a-Quiver Tree Project”; - Off-roading is strictly prohibited. Movements should be restricted to approved roads and walking trails; and - The use of pesticides is strictly prohibited. Mechanical pest control methods should be used instead. Wildlife: - Avoid erecting any fences around the lodge perimeter to enable free movement of wildlife through the area; - Unneutered domestic pets must be removed and relocated from the lodge. Alternatively, an exemption must be sought from the Gondwana Executive Management; - Feeding wild animals or deliberately interacting with them is strictly prohibited (this also include during field excursions); - Off-road driving is strictly prohibited. All lodge recreational activities must be conducted using existing tracks and roads;		

Aspect	Potential impact	Management and mitigation measures	Monitoring requirement	Responsibility
Operational phase				
		- Poaching, possession and consumption of game and game products is strictly prohibited; - Encourage whistleblowing by all lodge personnel through the established anonymous reporting channels; - Collaborate with established anti-poaching units (APU) in the fight against poaching; - Wild animals encountered on-site or within the lodge operational areas have the right of way; - Upon arrival at the lodge, guests should be warned of free roaming wild animals, and clear signage should be in place to raise awareness; - Set site specific speed limits (ideally 40 km/h) and ensure that appropriate road signages are clearly erected; - The use of unmanned aerial vehicles (drones) is strictly prohibited without prior approval by Gondwana Executive Management or ESI department; - Collaborate with regulators and conservation authorities in joint wildlife management efforts (e.g. conducting park patrols and annual game counts); and - All wildlife crime incidents must be reported to the Police and DWNP. Any incidents specifically involving the rhino population must be reported immediately to ERP.		
Small civil works	- Littering - Noise nuisance	- Civil works such as concrete mixing should be undertaken at a designated concrete bay;	- Ad hoc and as scheduled	- Maintenance team

Aspect	Potential impact	Management and mitigation measures	Monitoring requirement	Responsibility
Operational phase				
	- Occupational safety risks	- Prevent runoffs from aways of operation; - Collect and remove all debris and surplus materials upon completion of work; - Limit noisy activities to designated working hours (i.e. 07:00 am – 17:00 pm); - Train staff in safe handling of tools, equipment and machinery and on emergency procedures; and - Store fuels and oil containers on stable impermeable surfaces to avoid soil contamination; and - Ensure building materials, tools and machinery are stored on stable ground and properly secured to prevent tipping and injury to personnel.		
On-site solar plant	- Potential risk of avifauna collision with the on-site ground-mounted solar panels. - Attraction of fauna.	- Bird nests discovered on infrastructure should not be removed or destroyed. - Maintain records of bird collisions with the solar power plant; and - Instances of high collision rates must be investigated to identify potential causes and appropriate mitigation measures.	- Daily - Weekly	- Park wardens - Lodge guides
	- Poor operations. - Erosion risks.	- The ground-mounted solar array must be inspected and cleaned regularly to ensure it remains functional;	- Bi-weekly	- Maintenance team

Aspect	Potential impact	Management and mitigation measures	Monitoring requirement	Responsibility
Operational phase				
		- Prevent pooling of water to minimise attraction of wildlife or avifauna from nesting; and - Prevent creating erosion gullies when utilising water during cleaning operations.		
	- Enhance operations	- The ground-mounted solar array must be inspected and cleaned regularly to ensure it remain functional.	- Bi-weekly	- Maintenance team
Domestic waste management	- Littering, visual nuisance, odours and health risks.	- 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 a registered 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; - Ensure used oil is not disposed on-site, but rather trucked to the head office and recycled in collaboration with Oil Tech; - Ensure proper management of the composite site to organic waste is properly managed. Measures should be implemented to ensure vermin are not attracted to the site; and	- Daily - Weekly - Monthly	- All lodge staff - Staff member(s) tasked with waste management duties

Aspect	Potential impact	Management and mitigation measures	Monitoring requirement	Responsibility
Operational phase				
		- Fat trap for the kitchen grease must be emptied when full and disposed of at the designated area.		
Wastewater (effluent) management	- Possible sewage discharge runs. - Leakage and seepage of effluent into water resources. - Odours and disease transmissions,	- In terms of the Water Resources Management Act, No. 11 of 2013, obtain a wastewater treatment, effluent discharge and reuse licence from DWA for the treatment of domestic wastewater and reuse processes; - Ensure compliance with the licence conditions issued for the conventional gravity sewage system, 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 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 soaps and toilet cleaning products 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	- Daily - Weekly - Monthly - Annually	- Lodge manager - Lodge supervisor - Lodge maintenance team

Aspect	Potential impact	Management and mitigation measures	Monitoring requirement	Responsibility
Operational phase				
		emergency protocols to ensure effective management and monitoring of the facility.		
Land degradation	- Risk of fire,	- Roads are to be maintained regularly to redefine them as fire breaks; - Emergency response aids are to be in place throughout the Lodge lifecycle; and - All fire extinguishers must be regularly inspected and kept within their prescribed service schedule.	- Ad hoc	- Maintenance team - Lodge manager
Historical, archaeological and cultural heritage	- Potential damage to heritage or undiscovered archaeological finds,	- In the event that heritage objects or sites are discovered, the chance find procedure (Appendix A) must be adopted and followed; - A heritage consent from the National Heritage Council (NHC) will be required for the management of any future heritage finds; and - Compliance to the heritage consent conditions will be required (e.g. reporting to NHC on a biannual basis and renewal of the heritage consent throughout the Lodge lifecycle).	- Lodge lifespan	- All staff
Lodge renovation	- Impact on the viewshed and the area's aesthetic appeal.	- Ensure the design and features of new development and renovation are screened through the Environmental and Social Impact department prior to implementations. This will ensure the designs blend in with the natural background; and - Ensure no flood lights are used. This will require an amendment to the environmental clearance certificate.	- As scheduled	- ESI department - Lodge manager
Visitor's relations and management	- Violation of the commitments	- All lodge visitors are expected to abide by the information/notices conveyed to them for the duration of their stay at the lodge;	- Daily	- All lodge visitors

Aspect	Potential impact	Management and mitigation measures	Monitoring requirement	Responsibility
Operational phase				
	outlined in this ESMP.	- Visitors are not allowed to feed or deliberately interact with 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).		
Career uplifting opportunities	- Skills development.	- Engage in general environmental awareness, skills empowering, career advancing workshops and training (e.g. first aid training, hospitality, technical and software skills training); - 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.	- Ad hoc basis	- Gondwana People Team Department - Lodge manager - Lodge staff
Job creation and impacts on the local and regional economy	- Commitment to fair recruitment practices.	- Prioritise the employment of local community members, with all new recruitments to be conducted in accordance with Gondwana's corporate recruitment strategies; and - Where available, ensure that goods and services are sourced from local and regional suppliers to support the surrounding economy (e.g. wood from local farmers).	- Ad hoc basis	- Gondwana People Team Department - Lodge Management
Community relations	- Strong working relationship with the neighbouring parks, key	- The Proponent and Lodge manager must represent the Lodge by maintaining good working relations with the surrounding communities, neighbouring parks (e.g. Ais-Ais National Park), researchers, conservation groups (i.e. ERP), external auditors and regulatory authorities;	- Ad hoc basis	- The Proponent - Lodge manager

Aspect	Potential impact	Management and mitigation measures	Monitoring requirement	Responsibility
Operational phase				
	stakeholders 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; and - Maintain a complaint register or similar complaint logging system to ensure any complaint received from the community is recorded and addressed through the appropriate complaint resolution mechanisms.		

5.1.2 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 Lodge. The section also outlines detailed remediation; site control and monitoring activities that will be conducted once Lodge infrastructure is 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 Lodge. These measures aim to minimise the likelihood and extent of post-decommissioning impacts;
- Establish a long-term management plan for the Lodge 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, particularly in collaboration with selected stakeholders. 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 5 shall be followed and implemented, as best practice measures.

Table 5 - Rehabilitation plan for the Lodge

Aspect	Management measures required	Responsibility
Tools and equipment	- All fuel containers and tanks must be removed, and any hydrocarbon stains or spillages within lodge work areas must be promptly and thoroughly cleaned up; and - The fuel storage tanks, solar panels, all hand and power tools must be cleared from site prior to site closure.	- Lodge manager - Contractor - Maintenance team
Wastewater management systems	- All drainage systems, wastewater pipes and components of the wastewater treatment facility must be disconnected, dismantled and safely disposed offsite at a registered waste disposal facility or wastewater treatment works; and - Ensure all wastewater is properly drained (i.e. no pooling shall remain on-site upon closure).	- Lodge manager - Contractor - Maintenance team
Building remnants, scrap metals etc.	- All infrastructure, including concrete foundations must be demolished to ensure there will be no free-standing structures; and - Building remnants should be disposed offsite at a registered waste disposal site.	- Lodge manager - Contractor - Maintenance team
Solid waste management	- All solid waste generated must be handled in accordance with the site waste handling procedures; and - No waste may be buried on-site.	- Lodge manager - Contractor - Maintenance employees
Gravel roads	- Dis-used roads and site access roads must be rehabilitated to enhance the aesthetic value of the site.	- Lodge manager - Contractor - Maintenance employees

Aspect	Management measures required	Responsibility
Site closure	- Conduct a final site inspection with the representatives of the conservation organisations (i.e. ERP and management committees of the neighbouring parks), and / or regulatory authorities (MEFT, MIME, MLIREC, NHC 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 park representatives.	- Lodge manager - Selected stakeholders (ERP and neighbouring park Representatives) - Regulatory authorities
Future land use	- Collaboration with selected stakeholders is required to guide future land use planning.	- Proponent - Selected stakeholders

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

In the event that Lodge operations cease due to a transfer of ownership or lease of the property, 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 revised pursuant to the contract with the Proponent;
- B. Has been revised on the basis of information provided to ECC up to September 2025;
- C. Is for the sole use by the Proponent, lodge employees, contractors and subcontractors during the operational and decommissioning 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 - 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 6 provides the environmental aspects and impacts, mitigation and monitoring measures for archaeological and heritage aspects.

Table 6 - Archaeological and heritage aspects

Responsibility:	– The Lodge manager, Lodge supervisor(s), Lodge employees, contractors and subcontractors
Potential issues or impacts:	– Impact on heritage features.
Management /mitigation measures	
Potential to unearth heritage objects or resources	– 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. 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: – If operating machinery or equipment, stop work;

	- Demarcate the site with danger tape; - Determine geographical positioning system (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 Lodge's geographic information system (GIS) for field confirmation by an archaeologist; - Inspect the site and confirm addition to the Lodge 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.
	Should human remains be found, the following actions must be followed: - 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.