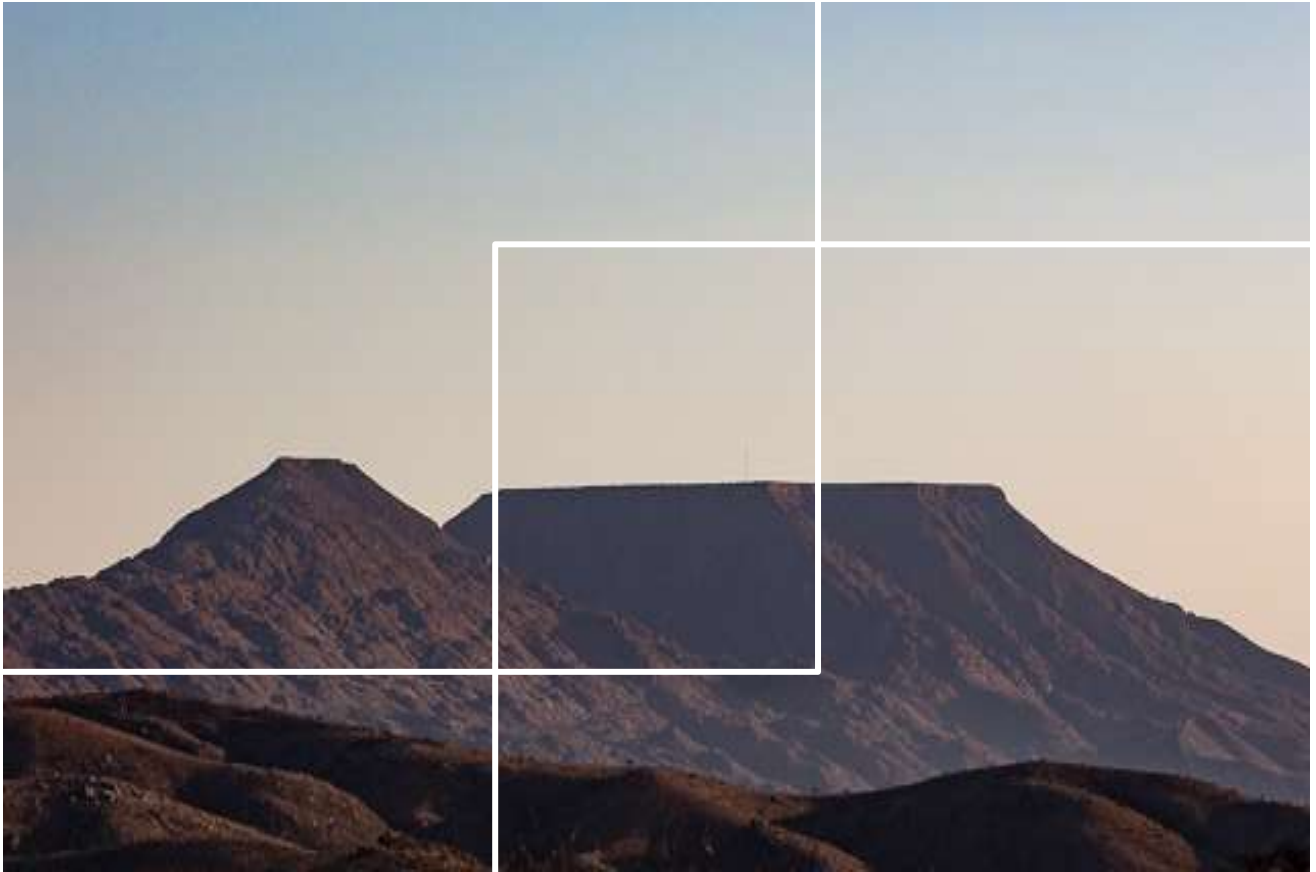




Submitted to: Weener Nature Reserve CC
Attention: Mr. Luc Van Raemdonck
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REPORT:

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN FOR WEENER LODGE

PROJECT NUMBER: ECC-174-661-REP-02-D

REPORT VERSION: REV 01

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DISCLAIMER

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ABBREVIATIONS

Abbreviation	Description
>	greater than
CC	Close Corporation
DEAF	Department of Environmental Affairs and Forestry
DSS	Directorate of Scientific Services
DWA	Department of Water Affairs
DWNP	Directorate of Wildlife and National Parks
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
GNR	Gamsberg Nature Reserve
GIS	geographic information system

Abbreviation	Description
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
MSDS	material safety data sheet
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
NTB	Namibia Tourism Board
NHC	National Heritage Council
NW	northwest
PPE	personal protective equipment
Pty	proprietary
PV	photovoltaic
W	west
WNR	Weener Nature Reserve CC

1 INTRODUCTION

1.1 PROJECT BACKGROUND

Environmental Compliance Consultancy (Pty) Ltd (ECC) has been engaged by Weener Nature Reserve CC (WNR) (hereafter referred to as “the Proponent”) to develop a comprehensive environmental and social management plan (ESMP) and apply for the environmental clearance certificate for the continued operation of Weener Lodge on farm Weener No. 193 (privately-owned land). Farm Weener No. 193 is located within the scenic Gamsberg Nature Reserve (GNR) landscape, in the Windhoek Rural Constituency, Khomas Region, Namibia (Figure 1).

The Proponent has duly signed a joint venture (JV) agreement with Chaffinch Trading Enterprises (Pty) Ltd (the farm owners) for this Project. The Lodge is fully operational and functions as a single high-end, self-contained, leisure and lounge accommodation unit. The Lodge can accommodate thirteen (13) guests at full capacity and is equipped with ablution facilities, a lounge, kitchen and an outdoor swimming pool. Additional Lodge infrastructure includes a horse barn, a workshop, a trickling filter wastewater treatment plant, a farmhouse for the Lodge manager and staff quarters for eight (8) Lodge employees.

The GNR is a vast, unique and scenic landscape, renowned for its natural landmarks (such as the Gamsberg Mountain) and abundant free-roaming wildlife populations. Farm Weener No. 193 covers approximately 9 600 hectares (ha), whereby approximately 2 000 ha have been low fenced for sustainable wildlife management purposes. No major civil works or expansion activities are currently planned by the Proponent. Therefore, this ESMP is prepared to provide a guiding tool and management framework to ensure the Lodge activities pose minimal impacts on both the biophysical and social environment.

Farm Weener No. 193 is located approximately 65 km west (W) of Rehoboth and is accessible via the C26 and D1278 gravel roads (Figure 1). The renowned Gamsberg Mountain lies northwest (NW) of the farm. The zoomed in satellite view of the Project site is provided in Figure 2.

1.2 CURRENT LODGE OPERATIONS

The Lodge’s current operations are conducted through its various departments. These administrative, hospitality and service-oriented activities are described in detail in the section below.

The Lodge is fully energy self-sufficient (i.e. not connected to an external off-grid power supply source). The energy for Lodge operations is supplied by photovoltaic (PV) roof-mounted solar panels, two (2) big batter systems and two (2) back-up diesel generators are installed to

ensure uninterrupted operations in the event that the solar system is unable to meet the Lodge's energy demand.

The water for Lodge operations and wildlife management is sourced from the farm's existing groundwater boreholes. Approximately 200 litres (L) of water are abstracted daily from the boreholes and subsequently pumped to various work areas and artificial waterholes via water pump stations and network of water supply pipelines.

Wastewater generated as part of the Lodge operations is collected through a conventional gravity fed sewage system and conveyed to a trickling filter wastewater treatment plant, where it undergoes microbiological treatment processes to minimise the risk of environmental contamination. The treated water is then discharged into the environment.

Different domestic waste types generated on-site as part of the Lodge operations are segregated into categories such as recyclable, non-recyclable and reusable waste, before being removed and disposed of at the Kupferberg waste disposal site in Windhoek.

The region's unique landscape and notable landmarks present opportunities for a range of recreational activities. To enhance the guests Lodge experience, the Lodge offers the following recreational activities:

- Guided scenic drives throughout the property using established tracks;
- Horse riding;
- Trophy hunting;
- Stargazing; and
- Nature walks.

The Lodge's exterior (bird's-eye view) and interior design is presented in Figure 3, while the staff quarters and horse barn are presented in Figure 4.

1.3 PRELIMINARY PROJECT PLANNING HIGHLIGHTS

1.3.1 STAKEHOLDER ENGAGEMENT

The Proponent engaged the farm owner during the Project planning phase to formalise a JV partnership and lease of the farm. The duly signed farm lease agreement is provided in Appendix A. On a related note, the Proponent also maintains positive and good working relations with the neighbouring farming community. This ensures open communication, builds trust with interested and affected parties (I&APs) and promotes joint and coordinated management of wildlife populations.

1.3.2 ESIA SCREENING EXERCISE

ECC conducted a preliminary screening exercise to assess the potential environmental and social impacts likely associated with ongoing Lodge operations. The findings indicate that the

Lodge footprint is very small and therefore its operational activities are expected to have minimal to low environmental and social impacts.

Considering the limited scale and low-impact nature of the Project and the absence of any sensitive or high-risk environmental receptors within the operational areas and that no Project expansions are currently planned, 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 provide a comprehensive framework which outlines the best environmental practices, practical mitigation measures and monitoring protocols to be implemented throughout the Lodge's lifespan. The primary objective is to preserve the receiving environment and its ecological functions. Through proactive management, the ESMP also seeks to minimise the potential environmental impacts and ensure that any impacts arising as a result of the Lodge's operations are effectively controlled and mitigated.

In addition to environmental protection, the ESMP takes into consideration the local social receptors. This report aims to ensure that local communities and other social receptors are neither disturbed nor adversely impacted by the Lodge's operations and its associated activities.

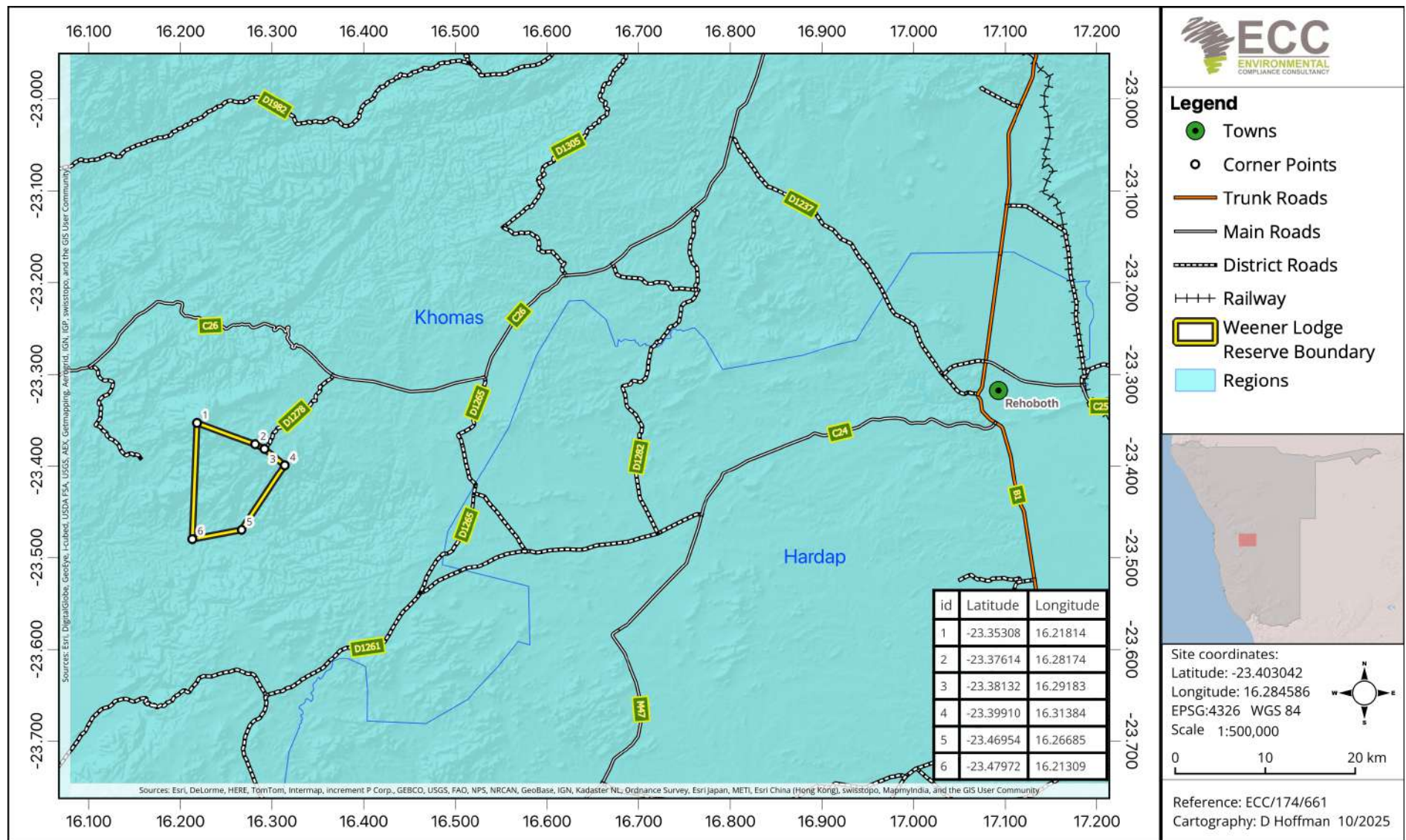


Figure 1 – Locality map of the Project site (farm Weener No. 193)

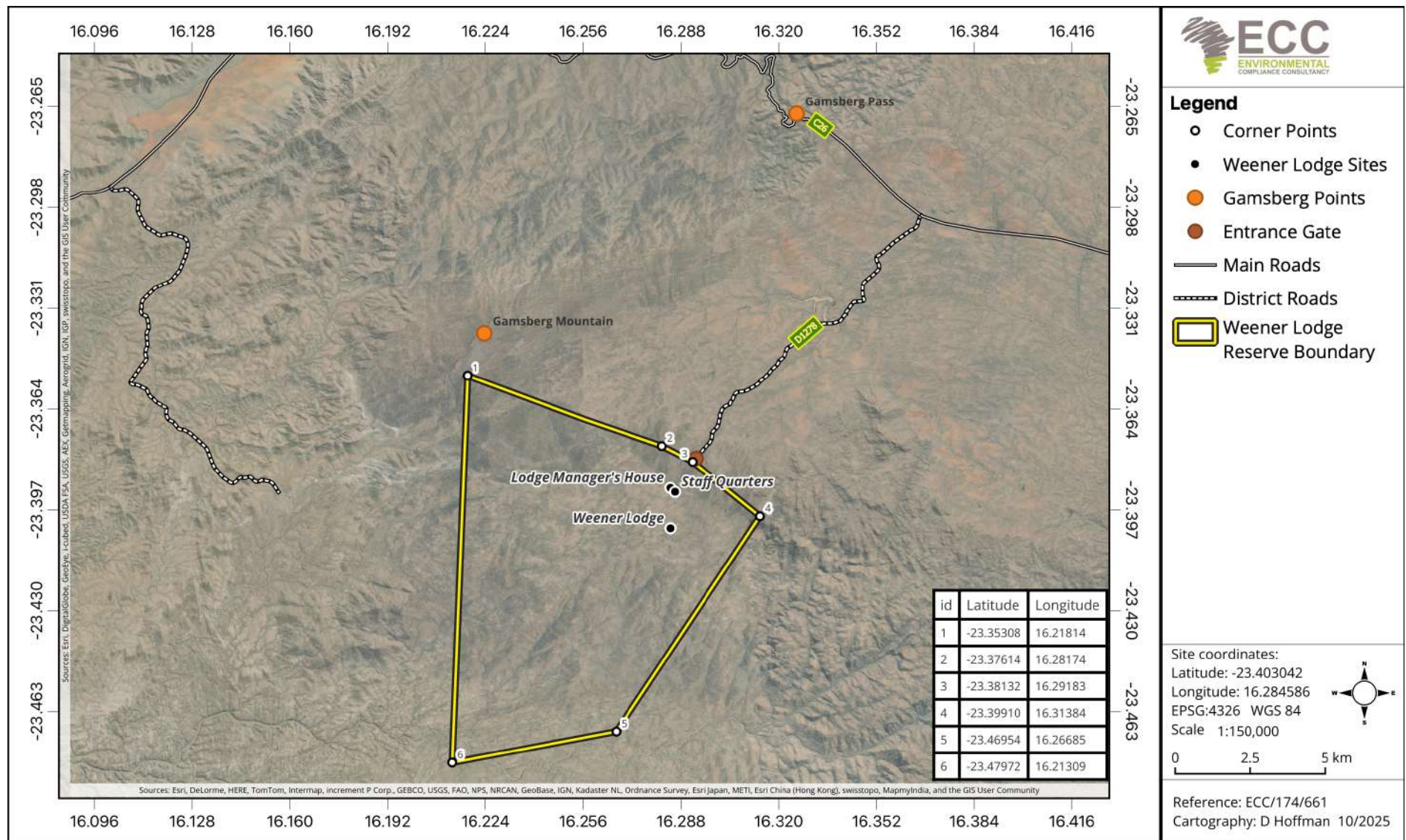


Figure 2 - Satellite view of the Project site (farm Weener No. 193)



Figure 3 – Exterior and interior design of the Lodge (Source: WNR, 2025)



Figure 4 – Staff quarters and horse barn (Source: WNR, 2025)

1.4 ENVIRONMENTAL REGULATORY REQUIREMENTS

The Weener Lodge is fully operational. The Lodge's operational activities trigger activities listed under the Environmental Management Act, No. 7 of 2007 (EMA) and its 2012 Regulations. To ensure regulatory compliance, an environmental clearance certificate must be obtained from the Department of Environmental Affairs and Forestry (DEAF) for the Lodge and its associated operational activities. In addition to this, the Proponent is required to register the establishment with the Namibia Tourism Board (NTB) and must obtain licences from the Department of Water Affairs (DWA) for the abstraction and use of water from existing boreholes, as well as for the operation of a wastewater treatment facility. Permits related to trophy hunting activities and utilising of game products, approved by the Directorate of Scientific Services (DSS) are also required.

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

1.5 PURPOSE OF THIS REPORT

This ESMP provides a logical framework, mitigation measures, management strategies and monitoring requirements for the Project and its associated operational 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 (MEFT) (the competent authority).

1.6 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 lodge personnel throughout all of the Lodge's lifespan are expected to comply with the requirements stipulated in this ESMP.

1.7 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 Lodge's operational activities, compiled in consultation with the Proponent. As no additional works or activities have been proposed, this ESMP has been compiled based on the current Lodge footprint and the nature of its operational activities. However, when the design, operation method changes or Lodge expansion works are proposed, this ESMP will need to be updated, and additional assessment may be required.

1.8 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:

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2 ENVIRONMENTAL MANAGEMENT FRAMEWORK

2.1 OBJECTIVES AND TARGETS

The Project site is in a pristine ecological environment, with scenic landmarks. The climatic condition is variable and the general area is predominantly characterised by game farming activities. Human disturbance is minimal and as a result, diverse wildlife populations roam the broader area and their natural corridors. To prevent and mitigate potential negative environmental and social impacts, specific environmental and social 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 WNR'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 the GNR environmental policies and guidelines;
- Preserve the natural state of the farm;
- Resolve complaints received from the surrounding farming community through effective grievance resolutions mechanisms;
- Minimal interruptions and interactions with wildlife populations and their natural corridors;
- Engage in eco-tourism initiatives and best environmental practices throughout the Project's lifespan; and
- Compliance with the conditions of all permits, licences and certificates issued for the Lodge.

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 the Lodge's lifespan;
- 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
- Upholding the Lodge's reputation by ensuring timely reporting of environmental incidents to the relevant regulatory authorities.

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

Table 1 - Project team roles and responsibilities

Role	Responsibilities and duties
Proponent (WNR)	- Responsible for the overall management and implementation of this ESMP; - Ensure site specific environmental policies are drafted/updated and communicated to all lodge personnel; - 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 the day-to-day Lodge operations to ensure compliance with this ESMP; - Ensure all personnel are aware of the commitments made in the ESMP and statutory licence and permit conditions approved for the Project (Lodge); - 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; - 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. Ministry of Environment, Forestry and Tourism (MEFT), Ministry of Agriculture, Fisheries, Water and Land Reform (MAFWLR), Ministry of Labour Industrial Relations and Employment Creation (MLIREC), Ministry of industries, Mines and Energy (MIME), GNR and National Heritage Council (NHC)).

Role	Responsibilities and duties
Lodge supervisor(s)	- 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 and subcontractors	Responsible to comply with this ESMP throughout the Project lifecycle, in addition to: - Demonstrating an understanding of the ESMP, including its content and requirements; - Attending briefings and training sessions 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 supervisor(s).

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 the Lodge manager and Lodge supervisor(s);
- Cooperate fully with environmental inspections, internal and external auditors and monitoring activities conducted by the Lodge manager, Lodge supervisor(s) 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

Any personnel employed for the Lodge operational phase shall be competent to perform tasks that have the potential to cause an environmental or social impact. In this instance, competence is defined in terms of appropriate vocational and hospitality education, specialised skill sets in wildlife management and prior work experience.

WNR 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:

- 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 refresher training courses shall be conducted to reinforce health, 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 Lodge operational workforce consists of eight (8) employees. The recruitment approach of new Lodge employees shall comply with the following criteria:

- Ensure that local people have access to information regarding job opportunities;
- 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, assigned duties and hourly remuneration (in accordance with the wage standard bracket 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 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, where required (i.e. surrounding farming community, NHC, MEFT, MAFWLR, MIME and GNR). 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 procedure; and
- Briefing on key social and environmental issues.

This ESMP shall be distributed to the Lodge team (including contractors and subcontractors, when contracted for any mechanical repairs, civil works 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 impacts. 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 contractor site supervisor(s) must ensure records of these training sessions are always kept onsite and filed.

3.2 EXTERNAL COMMUNICATION

The Lodge manager and shall represent the Project and shall liaise with external regulatory authorities (e.g. MEFT, NTB, NHC and MAFWLR), stakeholders from the GNR, community representatives and neighbouring farming community. This will ensure good working relations with the stakeholders and compliance with all relevant conservation regulations and the approved licences, certificate and permits for the Lodge.

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	Fire brigade
Rehoboth	+264 62 523811	+264 62 523 223	+264 62 522091

All wildlife crimes must be promptly investigated and reported to the GNR and MEFT.

The procedures for reporting of environmental incidents are discussed in section 4.3.

3.2.2 COMPLAINT HANDLING AND RECORDING

Any complaints received verbally by any personnel on the Lodge 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 who is overall responsible for managing and responding to 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 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 operational and decommissioning phase of the Project. It details procedures to ensure routine inspections and audits are conducted to ensure that the Lodge 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 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 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 any environmental issue, wildlife crimes, failure of equipment or accident, is reported to the 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, for example poaching incidents must be reported to MEFT through the Directorate of Wildlife and National Parks (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) 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.

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.

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. The licence renewal application must be submitted at least three (3) prior to the licence expiry.

Occupational incidents and accidents incurred on-site should be reported to the authorities (i.e. Occupational Safety & Health Department) at MLIREC, by using form F.5.

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

The Lodge manager must ensure that the final 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 licenses are fully met, should this be required by DWA. The licence renewal application must be submitted at least three (3) prior to the licence expiry.

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

4.4 ENVIRONMENTAL CERTIFICATES, LICENCES AND PERMITS

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 regulatory authorisation	Act/Regulation/policy
Wastewater treatment, effluent discharge and reuse licence	DWA	Required for the treatment and discharge of domestic waste.	Water Resources Management Act, No. 11 of 2013 and the 2023 Regulations
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 and the 2023 Regulations

Licence or certificate	Relevant authority	Related activity requiring regulatory authorisation	Act/Regulation/policy
Registration of the five (5) existing dams on the farm	DWA	Required for the legalisation of five (5) existing dams on the farm.	Water Resources Management Act, No. 11 of 2013 and the Regulations of 2023
Environmental clearance certificate	DEAF	Required to undertake the listed activities associated with the Lodge operations.	Environmental Management Act, No. 7 of 2007 and the 2012 Regulations
NHC consent	NHC	NHC consent for the management and preservation of heritage objects, if discovered within the Lodge's work areas.	National Heritage Council Act, No. 27 of 2004
NTB certificate	NTB	Registration of the establishment with the NTB.	Namibia Tourism Board Act, No. 21 of 2000
Trophy hunting permit	DDS	Trophy hunting permits are required for hunting huntable game (i.e. if planned to hunt more animals than allocated under the yearly hunting regulations). Importantly, special predator trophy hunting permits must be obtained to hunt cheetah or leopards.	Nature Conservation Ordinance Act, No. 4 of 1975
Permit to utilise game (wild animals)	DDS	A permit is required for the following: shoot and sell, shoot for own use, keep and sell, transport, night culling, trophy meat, catch, keep and sell trophy.	Nature Conservation Ordinance Act, No. 4 of 1975

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 the routine inspections across all service/work 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 supervisor 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, permits and certificates;
- Complete or partial suspension of Lodge 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 impacts of the Lodge 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 Lodge supervisor(s) will use the operational management plan to undertake daily, weekly and monthly inspections to ensure the Lodge remains compliant with this ESMP during operations and manage any ad hoc activities.

This ESMP has been developed to provide guidance to the Lodge personnel, appointed contractors and subcontractors throughout the operational and decommissioning phase. Specifically, it covers:

- **Operational phase:** the day-to-day management of the Lodge and its associated activities, including any required mechanical or maintenance work; and
- **Decommissioning phase (future phase):** the systematic cessation of Lodge operations, including the implementing of appropriate after-care measures following cessation of Lodge operations.

5.2 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, 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 and social aspects, impacts, mitigation and monitoring measures for the operational phase

Aspect	Potential impact	Management and mitigation measures	Monitoring requirement	Responsibility
Operational phase				
Environmental awareness	- Environmental grievances and misconduct due to lack of awareness.	- Keep environmental policies and guidelines on file; - Ensure environmental awareness posters are displaced across different Lodge areas, staff quarters and roadways; - Ensure the ESMP is revised as required to align with the provisions outlined in the environmental policies, regulations and their amendments thereof; - Ensure staff are regularly inducted (trained) on environmental matters to ensure they understand the requirements of the ESMP; and - Ensure roles and responsibilities of various staff members are clearly defined in their employment contracts.	- Ad hoc	- WNR Principals and Human Resource (HR) department
Stakeholder engagement	- Good stakeholder and community relations.	- Collaborate with nature conservation groups (i.e. GNR) and the neighbouring farming community in the management of wildlife populations. - The Proponent and Lodge manager must represent the Lodge by maintaining good working relations with the regulatory authorities (MEFT, MAFWLR, NHC, MIME and MLIREC); - 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 timely reported to NHC; and - Maintain a complaints register or similar complaint logging system to ensure any complaints received from the community is recorded and addressed through the appropriate complaint resolution mechanisms.	- Ad hoc	- WNR Principals - Lodge manager

Aspect	Potential impact	Management and mitigation measures	Monitoring requirement	Responsibility
Operational phase				
Legalisation of water resources	- Regulatory compliance with the Water Resources Management Act, No. 11 of 2013 and the Regulations of 2023.	- The ten (10) existing boreholes on the farm (Figure 5) must be registered with the DWA in accordance with section 6 of the Water Resources Management Act, No. 11 of 2013; - An abstraction and water use licence should be obtained from the DWA as required under section 44 of the Water Resources Management Act, No. 11 of 2013; and - The five (5) existing water dams on the farm (Figure 6) must be registered with the DWA to ensure compliance with section 129 of the Water Resources Management Regulations of 2023.	- Once off, and renewal to be submitted in advance to expiry (where applicable)	- WNR Principals - Lodge manager
Water resources management	- Potential lowering of the water table as a result of daily water abstraction (~ 200 litres (L) daily). - Unsustainable abstraction and improper water use.	- 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); - Develop an inspection schedule for all water pipelines to ensure leakages are detected timely and fixed; - As per the current schedule, test the water quality every six (6) months; and - Record (daily) flowmeter readings from all metering systems to monitor water usage and address irregular trends.	- Daily - Weekly - Bi-annually	- All Lodge staff - Guests at the Lodge - Maintenance team
Domestic waste management	- Littering, visual nuisance,	- Implement the waste management hierarchy across the site: avoid, reuse, recycle and then dispose of;	- Daily - Weekly - Monthly	- All Lodge staff - Staff member(s) tasked with

Aspect	Potential impact	Management and mitigation measures	Monitoring requirement	Responsibility
Operational phase				
	odours and health risks.	- Maintain good housekeeping on-site to ensure vermin are not attracted to the Lodge 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 Kupferberg Landfill Site in Windhoek; - The waste storage area must always be kept clean and tidy and be scavenger and baboon proof; - Once emptied, food waste bins must be cleaned, dried and returned to their designated areas; and - Fat traps for the kitchen grease must be emptied when full and disposed of at the designated area and treated as hazardous waste.		waste management duties
Wastewater (effluent) management	- Possible sewage discharge runs. - Leakage and seepage of effluent into water resources. - Odours and disease transmissions.	- Obtain a wastewater treatment, effluent discharge and reuse licence for the trickling filter wastewater treatment system in accordance with Water Resource Management Act, No. 11 of 2013; - Ensure compliance with the licence conditions, including 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;	- Daily - Weekly - Monthly - Annually	- Lodge manager - Lodge supervisor - Lodge maintenance team

Aspect	Potential impact	Management and mitigation measures	Monitoring requirement	Responsibility
Operational phase				
		- 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.		
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; - Fire management should be conducted in accordance with the guidelines outlined in the Fire Management Strategy for Namibia's Protected Areas; and - All fire extinguishers must be regularly inspected and kept within their prescribed service schedule.	- Ad hoc	- Lodge manager - Maintenance team
Biodiversity management	- Interaction with biodiversity. - Potential introduction and spread of	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:	- Daily - Weekly - Monthly - Annually	- Lodge manager - All Lodge staff - Guests at the lodge

Aspect	Potential impact	Management and mitigation measures	Monitoring requirement	Responsibility
Operational phase				
	alien or invasive species. - Poaching.	Flora: - Incorporate indigenous plants into the landscaping and ornamental design and ensure no alien invasive species are introduced; - Off-road driving is strictly prohibited; - Invasive plant species should be removed, and their spread should be prevented; and - The use of herbicides and pesticides is strictly prohibited. Mechanical pest control methods should be used instead. Fauna: - Feeding wild animals or deliberately interacting with them is strictly prohibited; - Off-road driving is strictly prohibited; - Nighttime recreational activities (i.e. stargazing) must be carefully planned to prevent intrusion into established wildlife home ranges to avoid disturbances and unintended wildlife interactions; - 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; - The setting of snares, illegal collection of veld foods (e.g. tortoises, etc.) is strictly prohibited. Indiscriminate the killing of species perceived as dangerous (e.g. snakes, etc.); - Encourage whistleblowing by all lodge personnel through the established anonymous reporting channels;		

Aspect	Potential impact	Management and mitigation measures	Monitoring requirement	Responsibility
Operational phase				
		- Set site specific speed limits (ideally 40 km/h) and ensure that appropriate road signages are clearly erected; - Collaborate with the regulators and conservation authorities in joint wildlife management efforts; - Police, MEFT and GNR must be notified of any wildlife crime incidents; - Bird nests discovered on infrastructure should not be removed or destroyed; - Trophy hunting permits must be obtained from DSS, and special permits are required for hunting protected species such as leopards and cheetahs; - Hunting activities must be strictly conducted in accordance with the species-specific quotas and specific hunting seasons approved by DSS; - All trophy hunting permits must be valid and shall be deemed void upon expiry; - Trophy hunting expeditions must be supervised by registered professional hunters; and - Conduct annual game counts and maintain records of hunted game to ensure wildlife population dynamics are well understood.		
Historical, archaeological and cultural heritage	- Potential damage to heritage or undiscovered archaeological finds during the	- In the event that heritage objects or sites are discovered, the chance find procedure (Appendix B) must be adopted and followed; - Heritage consent from the NHC will be required for the management and preservation of any future heritage finds; and - Ensure compliance to the heritage consent conditions (e.g. reporting to NHC every six (6) months and annual renewal of the heritage consent throughout the Lodge lifecycle), if required.	- Project lifespan	- All staff

Aspect	Potential impact	Management and mitigation measures	Monitoring requirement	Responsibility
Operational phase				
	operational phase.			
Small civil works	- Littering - Noise nuisance - Occupational safety risks	- Limit civil works to designated working hours (i.e. between 07:00 am and 17:00 pm) to minimise the generation of disruptive noise; - Collect and remove all debris and surplus materials upon completion of work; - Train staff on safe handling of tools, equipment, machinery and on emergency response procedures; and - Ensure building materials, tools and machinery are stored on stable ground and properly secured to prevent them from tipping and injury to personnel.	- Ad hoc and as scheduled	- Maintenance team
Lodge repair, maintenance and renovation work	- Impact on the viewshed and the area's aesthetic appeal.	- Ensure additional refurbishing features of the Lodge blend with the natural background; and - Ensure no flood lights are used. This will require an amendment to the environmental clearance certificate.	- As scheduled	- WNR Principals - Lodge manager - Maintenance team
Visitor's relations and management	- Violation of the commitments outlined in this ESMP.	- 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).	- Daily	- All lodge visitors

Aspect	Potential impact	Management and mitigation measures	Monitoring requirement	Responsibility
Operational phase				
Domestic animals and pets (cats, dogs and horses)	- Uncontrolled breeding, aggression and disease transmission.	- Unneutered pets must not be kept at the lodge to prevent uncontrolled breeding and aggression; - Do not allow pets to accompany guests on nature walks or game drives; - Ensure adequate resources are in place for proper care and management of animal welfare (horses); - Maintain regular vaccination and deworming schedules, including rabies vaccinations; and - Ensure responsible breeding control to prevent overpopulation.	- Throughout the Lodge lifespan	- Lodge manager - Lodge staff
Career uplifting opportunities	- Skills development. - Commitment to ethical employment practices.	- Engage in general environmental awareness, skills empowering, career advancing workshops and training (e.g. first aid training, hospitality, technical and software skills training); - Where possible, ensure that local community members are prioritised for employment opportunities; and - Ensure deserving candidates are promoted to leadership roles.	- Ad hoc basis	- WNR Principals - Lodge manager - Lodge staff

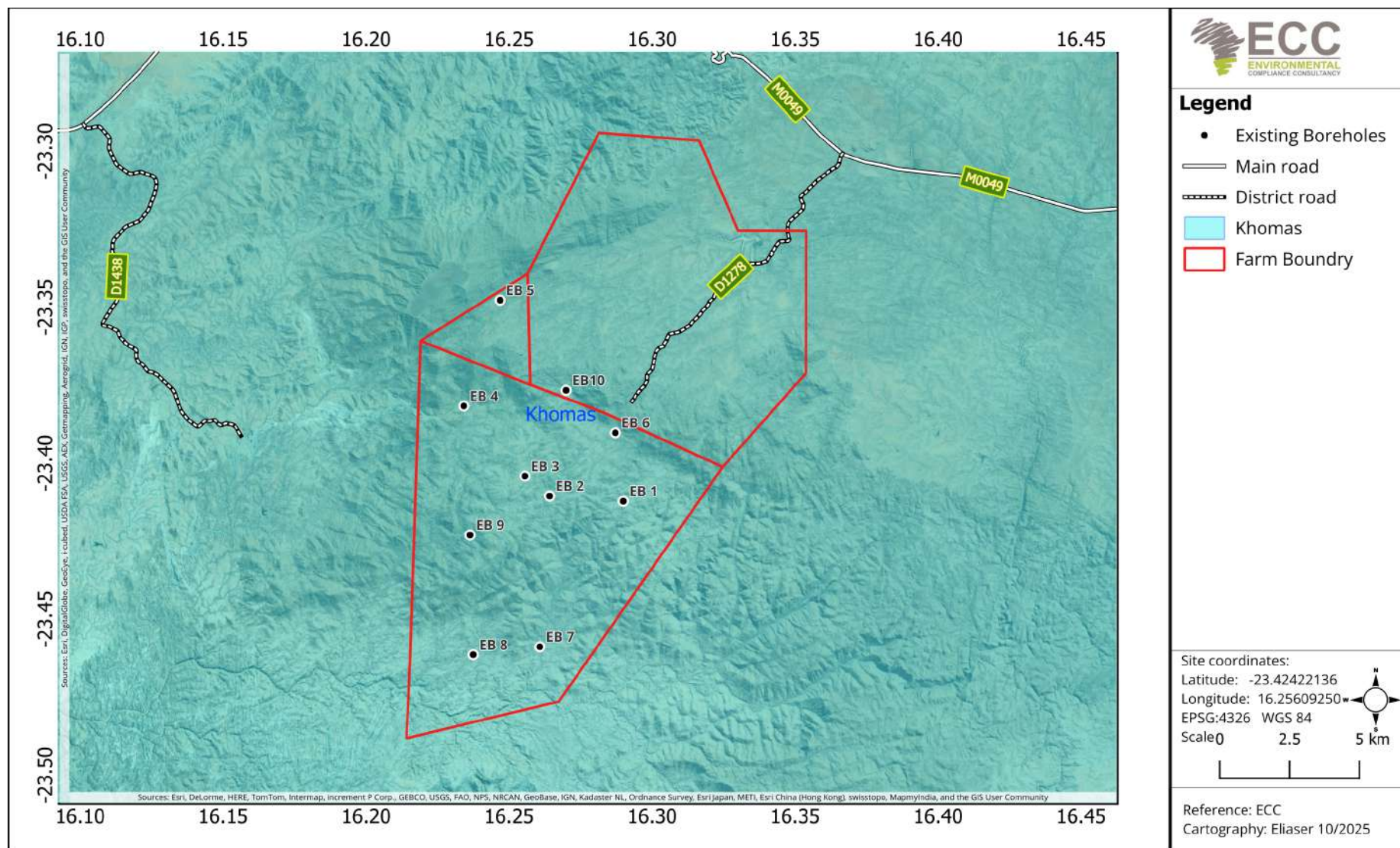


Figure 5 - Ten (10) existing boreholes on farm Weener No. 193

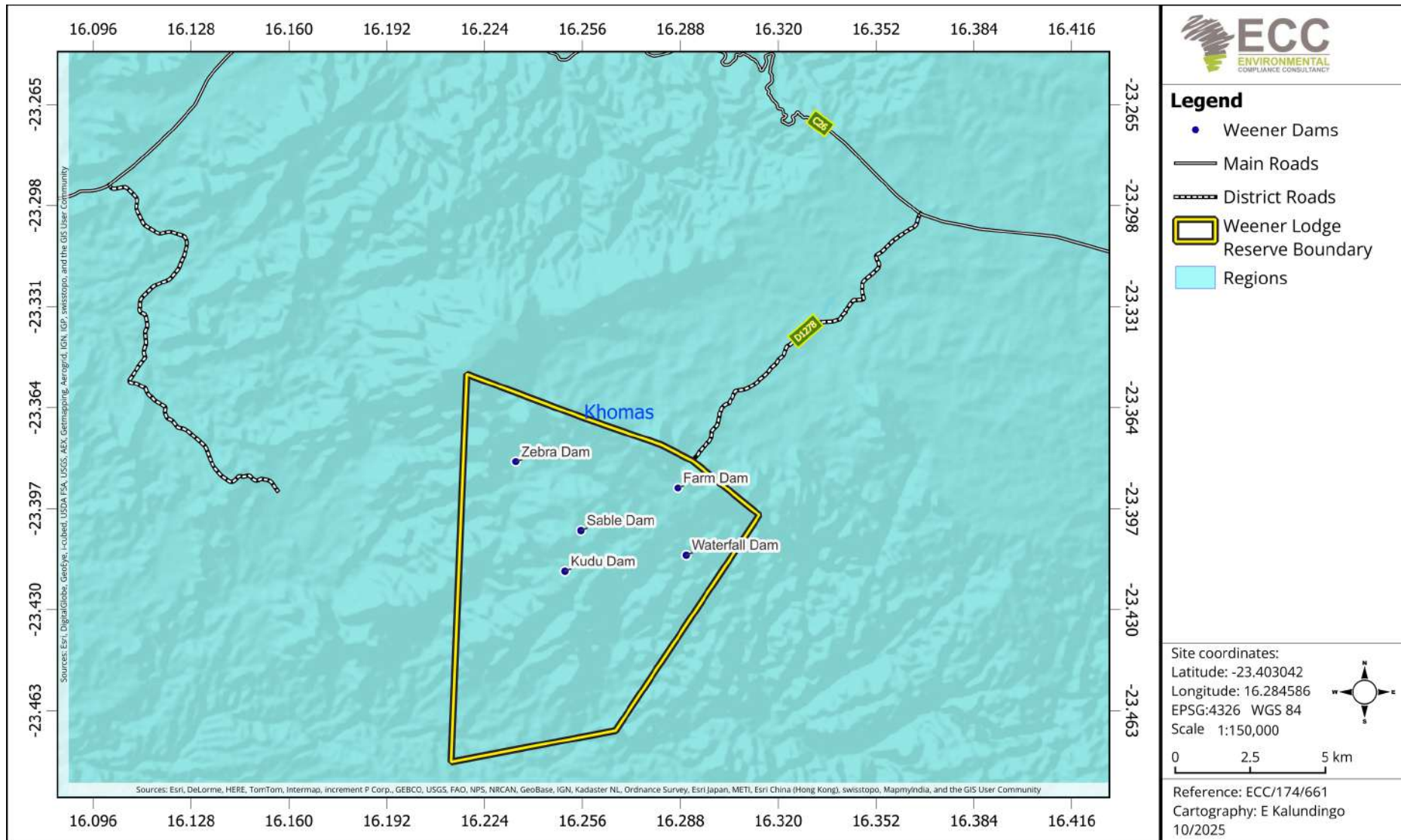


Figure 6 - Five (5) existing water dams on farm Weener No. 193

5.3 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 consultation and 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.

Recreational activities are prohibited during the decommissioning phase. This is to avoid interference with decommissioning operations and to avoid further environmental disturbances such as noise, habitat disruption and disturbance to local fauna.

Table 5 - Rehabilitation plan for the Project

Aspect	Management measures required	Responsibility
Tools and equipment	- 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.	- WNR Principals - 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 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).	- WNR Principals - Lodge manager - Contractor - Maintenance team
Building remnants, scrap metals etc.	- All infrastructure 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.	- WNR Principals - 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.	- WNR Principals - Lodge manager - Contractor - Maintenance team
Gravel roads and internal fences	- Dis-used roads and site access roads must be rehabilitated to enhance the aesthetic value of the site; and	- WNR Principals - Lodge manager

Aspect	Management measures required	Responsibility
	- Remove all fences that could pose as obstacles to wildlife moving between different home ranges.	- Contractor - Maintenance employees
Site closure	- Conduct a final site inspection with the representatives of the conservation groups (i.e. GNR), 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.	- WNR Principals - Lodge manager - GNR representatives - Regulatory authorities - Farm owner
Future land use	- Collaborate with selected stakeholders and the farm owner on future land use planning decisions.	- WNR Principals - Selected stakeholders - Farm owner

6 PROPERTY LEASE, TRANSFER OR CESSATION OF THE JV PARTNERSHIP

In the event that Lodge operations cease due to a transfer of ownership, lease of the property or cessation of the JV 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 November 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 – THE SIGNED FARM LEASE AGREEMENT

APPENDIX B - 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 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/WNR Principals – 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 NHC immediately. Should a heritage site or archaeological site be uncovered or discovered particularly during the 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 global positioning system (GPS) position if possible;

	- Report findings to the Lodge supervisor; - Report findings, site location and action taken to the Lodge manager or WNR Principals; - 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. 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.
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