



ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN

March 2026 – February 2029



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Table of Contents

1.	Zambezi Mubala Camp Overview	1
1.1.	Locality	1
1.2.	Lodge Vision.....	1
1.3.	Infrastructure and land use	2
1.4.	Operations and activities offered	3
1.5.	Projects and affiliations	4
2.	Environmental and Social Management Plan (ESMP)	4
2.1.	ESMP Objectives	4
2.2.	ESMP Implementation	5
2.2.1.	ESMP Administration	5
2.2.2.	Company organogram.....	6
2.2.3.	Environmental Awareness Training.....	6
2.2.4.	Environmental Compliance Monitoring.....	6
2.3.	Operational Phase.....	7
2.3.1.	Management Actions	7
2.3.1.1.	Environmental Management System (EMS)	7
2.3.1.2.	Socio-Economic & Community Management	7
2.3.1.3.	Biodiversity & Landscape Management.....	8
2.3.1.4.	Natural Resources Management	10
2.3.1.5.	Pollution Control & Waste Management.....	11
2.3.1.6.	Environmental Emergency Preparedness & Response	12
2.3.1.7.	Protection and preservation of heritage resources	13
2.3.2.	Environmental monitoring.....	14
2.4.	Decommissioning Phase	16
3.	Conclusion	16
4.	Annexures.....	17

List of figures

Figure 1: Location of Zambezi Mubala Camp	1
Figure 2: Zambezi Mubala Camp Infrastructure Map.....	2
Figure 3: Camping2Go Unit.....	3
Figure 4: Company Organogram	6

1. Zambezi Mubala Camp Overview

The Zambezi Mubala Camp is located in the Zambezi Region, along the banks of the Sikunga Fish Protect Area (FPA), Zambezi River, 35 kilometers south east of Katima Mulilo, which is the nearest main town. Owned by Gondwana Collection Namibia since 2017, it is part of a larger portfolio of lodges across Namibia. The name – “Mubala” means “colour” in the local Silozi language.

The Zambezi Mubala Camp is a paradise for nature and fishing enthusiasts, and a bucket-list stop for all bird-lovers with the seasonal (August-November) Southern Carmine Bee-eater colony visits to the banks of the Zambezi, approximately 3 to 4 km east of the Camp.

The Camp is within the Sikunga Conservancy. A benefit sharing contract has been agreed upon between the Sikunga Conservancy and the Gondwana Collection Namibia.

1.1. Locality

The Zambezi Mubala Camp is located in the Zambezi Region, along the banks of the Sikunga Fish Protect Area (FPA), Zambezi River, 35 kilometers south east of Katima Mulilo, which is the nearest main town. Access to the camp is gained about 2 km from the D3508 tarred road.

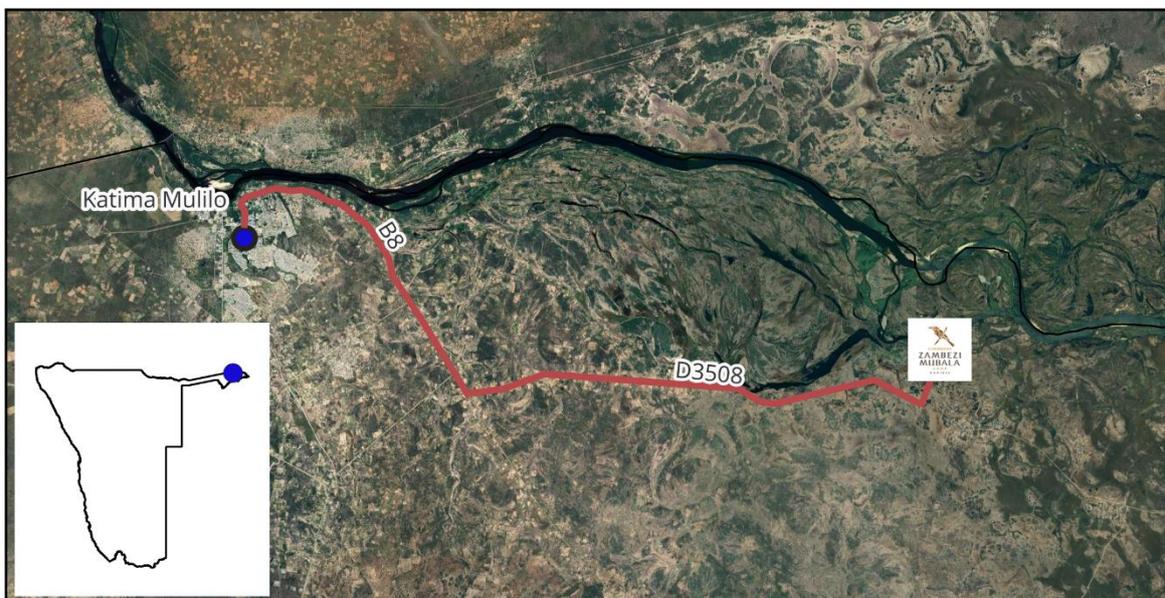


Figure 1: Location of Zambezi Mubala Camp

1.2. Lodge Vision



Fish Eagle calls resound through the day, amid birdsong and the soft splash of water against the riverbank. It's time to breathe in Life and relax to the tune of nature on the shores of one of Africa's most famous rivers. Hop aboard a boat trip to explore the Zambezi, try your luck at luring the elusive Tiger Fish and savor the colors of a rich red sunset over the calm surface of the water. When night falls, the stars put on one of the finest shows on the planet, and Zambezi peace drifts through the camp like a fresh and rejuvenating breeze.

1.3. Infrastructure and land use

The infrastructure footprint for Zambezi Mubala Camp (figure 3) indicates the area that is currently utilized by the Camp.



Figure 2: Zambezi Mubala Camp Infrastructure Map

The Camp consists of the following infrastructure:

Main building	Reception and curio shop
	Restaurant
	Bar
	Kitchen
	Public Bathrooms
	Office
Guest accommodation and amenities	8 stand-alone standard guest tented camps, all with en-suite bathrooms (Figure 1)
	10 campsites, each with their own ablution block
	3 pilot rooms
	1 larger ablution block (for groups)
	One medium-sized swimming pool
Operational facilities and staff accommodation	A boat launching area and jetty
	2 Staff accommodation cabins
	Laundry
	Workshop and generator room
	Waste water treatment plant



Figure 3: Camping2Go Unit

Guests can safely drive to Zambezi Mubala Camp, which is 2.2km from the tarred, D3508 Road.

Water for Camp usage is drawn from the river after it has undergone a filtration process. Registration for the abstraction of water at the Ministry of Agriculture, Water and Land is yet to be completed.

A wastewater treatment plant has been installed for the treatment of sewage and wastewater. The plant filters out solid waste which can be collected and discarded. Water is filtered through a trickling system which uses enzymes to treat used water. The treated water will be re-used in the garden. The plant was successfully installed in October 2025, pending application of water discharge from Ministry of Agriculture, Water and Land reform.

The Camp is connected to the national electricity grid, with one 50Kva diesel generator as back up.

Waste is managed by sorting into categories of general waste, paper, tins, glass and plastic. Currently waste is being transported to a designated municipal site in Katima Mulilo. The camp aims to enhance waste disposal and recycling by partaking in local initiatives and creating a composting bin for wet waste.

1.4. Operations and activities offered

Zambezi Mubala Camp offers the following activities to its guests:

- Guided boat cruise on the Zambezi River.
- Guided fishing cruise on Zambezi River.
- Fishing in the Sikunga FPA Channel

Guided boat cruises adhere to internal guidelines and external restrictions pertaining to speed limits, accessible areas and good practices on river activities. All activities are monitored, and guides are trained.

Guided fishing as an activity, is facilitated by trained guides from the local area. Procedures are in place for catch and release of fish. No fish are caught for consumption. Gondwana Collection is compliant in the relevant permit registrations.

1.5. Projects and affiliations

Gondwana Collection through Zambezi Mubala Camp is a member and supports the Sikunga Conservancy through multiple community initiatives under its Environmental and Social Impact (ESI) mandate:

Education: school renovations, provision of learning materials, scholarships, and environmental education programs.

Capacity-building: workshops for conservancy members on conservation governance, financial management, wildfire management skills, and resource monitoring.

Community-led conservation: support for anti-poaching patrols, monitoring of fish and wildlife resources, and establishment of community ranger networks.

Eco-tourism promotion: facilitation of local craft markets, cultural tourism, and homestays linked to lodges.

Community development projects: clean water initiatives, agricultural support (e.g., conservation farming techniques), village electrification projects, and small enterprise development.

In addition to the above projects, Damara Mopane Lodge is a member of the Gondwana Care Trust. Proceeds of the trust are used to fund:

- Back2School project in which stationery and school bags are donated to school children every year.
- Meal4Two whereby daily meals are provided to food-insecure communities across Namibia.
- Eduvision, providing digital learning solutions to under resourced schools.

2. Environmental and Social Management Plan (ESMP)

2.1. ESMP Objectives

The objectives of this plan are to:

- a) Enhance the socio-economic and pro- biodiversity impacts of the operation.
- b) Identify, minimize and mitigate negative environmental impacts of the operation.
- c) Meet the requirements of relevant legislation.

- d) Initiate a process which ensures that successive managers have a consistent environmental approach to operating the Camp into the future in conformity with Executive Management, Board guidelines and systems.
- e) Enable management to monitor and mitigate environmental impacts.
- f) Create awareness amongst all staff on the importance of maintaining sound environmental practices in all spheres of operation.
- g) Implement the environmental policies and philosophy of the Gondwana Collection.
- h) In close co-operation with the Environmental and Social Impact Department of Gondwana, promote and sustainably manage biodiversity conservation in the region, which in turn will increase the opportunities for ecotourism activities in the local area and create Employment opportunities (community development and engagement, botanical walks, bird watching cruises, fishing trips & Sundowner cruises.)

The strategies employed to achieve the above objectives include:

- a) Ensure that the ESMP becomes an integral part of the daily operating procedures for the Camp via the Annual Work Plan, which includes environmental monitoring.
- b) Create environmental awareness among all staff and build environmental responsibility and authority into job descriptions and operation manuals.
- c) Expose guests to this awareness program through information materials and encourage their active participation where appropriate.
- d) Subject the camp and its activities to independent, external assessments from time to time via Eco-awards Namibia.

2.2. ESMP Implementation

2.2.1. ESMP Administration

This ESMP has been reviewed by the Gondwana ESI Department and the Gondwana EXCO. Along with additional environmental policies and management procedures, it is the principal document guiding daily environmental operational activities at the Camp.

The Collection and Camp Managers shall carry overall responsibility for the implementation of the ESMP and the ESI Department will be responsible for monitoring the process.

The ESMP is, however, a dynamic document and needs to respond to changing conditions over time. All Camp staff are encouraged to find ways to improve environmental standards and to test new approaches. Such a change shall be motivated by the Camp management and submitted to the ESI department for review. The ESI department and EXCO will look favorably at new innovative ideas that improve both environmental management and efficiency and will facilitate their sharing with other Lodges in the Gondwana Collection.

The ESMP consists of two phases:

- Operational Phase (current phase)
- Decommissioning phase (future phase – not determined)

2.2.2. Company organogram

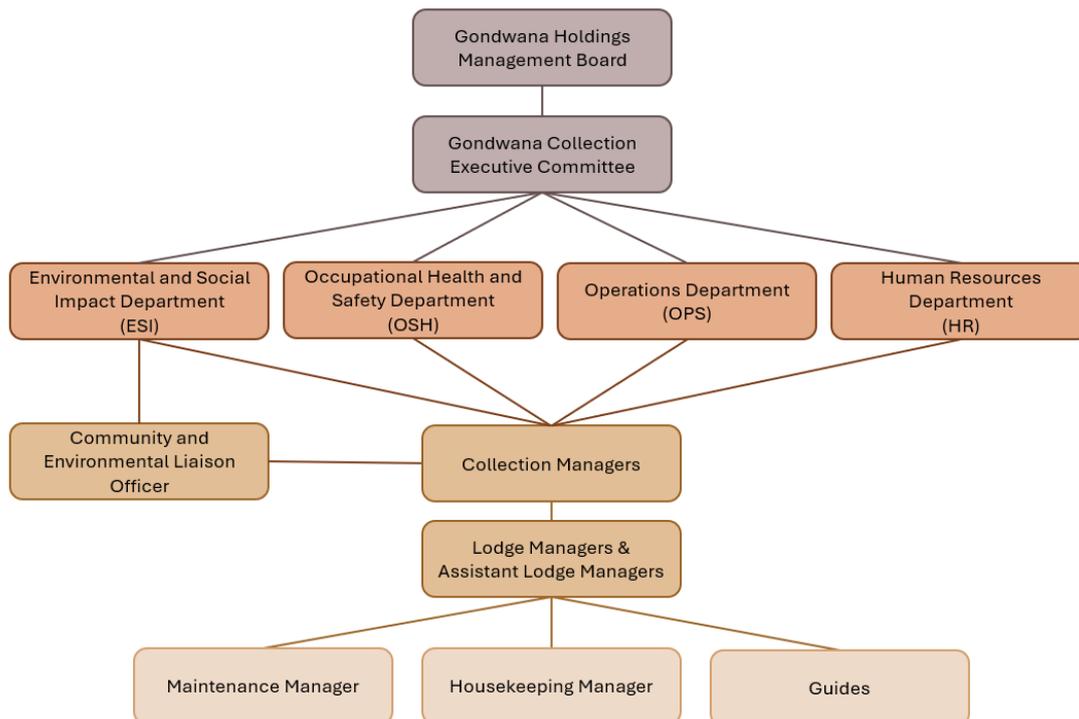


Figure 4: Company Organogram

2.2.3. Environmental Awareness Training

Once the ESMP has been approved all employees shall undergo an awareness training program, aimed at explaining the roles and responsibilities of all staff as well as the reasons and importance of good environmental management. Where appropriate, specific activities contained in the ESMP shall be included in job descriptions and be recognized as key performance areas against which staff should be evaluated.

2.2.4. Environmental Compliance Monitoring

The ESI department carries the responsibility of reviewing compliance and its management thereof. Regular checks and reporting as per requirement of the environmental clearance will be done on a bi-annual basis in accordance with the ESMP management and monitoring actions. Overall monitoring and evaluation reach beyond the ESMP. It is encouraged to continuously monitor environmental impacts and improvements. Non-compliances found shall be reported to the relevant department for correction and re-evaluation.

2.3. Operational Phase

2.3.1. Management Actions

2.3.1.1. Environmental Management System (EMS)

Objective	Management Measure	Monitoring Action & Method	Responsibility
To ensure that company Environmental policies & the ESMP are understood by management & staff	Environmental policies & ESMP incorporated into contract of Camp employees	Contract which aligns Environmental policies & ESMP	HR Department, Collection Management, Camp Management
	Staff receive training and understand the implications and reasons for the ESMP	Training held & roles and responsibilities of various staff members clearly spelt out and included in job descriptions	ESI Department, Camp Management
	External monitoring of ESMP process via Eco-Awards	Submit Camp for Eco-Awards Certification	Camp Management, ESI Department

2.3.1.2. Socio-Economic & Community Management

Objective	Management Measure	Monitoring Action & Method	Responsibility
Ensure that the agreed socio-economic benefits of the JV contract are achieved	Implement contract monitoring tool at quarterly JV meetings	Ensure that JV agreement is reviewed and acted upon and attend JMC meetings and circulate minutes to Operations Manager and Environmental Committee	ESI Department, Community Liaison Environmental Officer, Camp Management
	Maintain regular contact with conservancy management	Communicate as the need arises to address issues of mutual interest/concern	ESI Department, Community Liaison Environmental Officer, Camp Management
	Provide support where appropriate, for conservancy income generating enterprises (e.g. Carmine Bee-Eater project)	Support tabled and recorded during JV meetings	ESI Department, Community Liaison Environmental Officer, Camp Management

	Provide support with wildlife monitoring	Participate when possible, in Wildlife senses, counts in the conservancies and event book monitoring	ESI Department, Community Liaison Environmental Officer, Camp Management, Guides
	Ensure all payments are made in accordance with the JV contract	Share at JV meetings and keep monthly records	Community Liaison Environmental Officer, Camp Management, Guides

2.3.1.3. Biodiversity & Landscape Management

Objective	Management Measure	Monitoring Action & Method	Responsibility
Minimise impacts on vegetation	Identify and remove existing invasive alien plants in Camp area	Conduct regular inspections and keep staff informed when the need arises to remove invasive alien species	Camp Management, Maintenance Manager
	Ensure introduced ornamental plants are indigenous to the area or non-invasive (e.g. for screening of walls, unsightly fences etc.)	Ask Environmental Committee for list of suitable plants, if required	Camp Management, Maintenance Manager
	Conduct activities with due regard for vegetation	Guide training in boat handling & monitoring	Camp Management, Guides
Minimize impact on wildlife	Ensure staff do not have an impact on wildlife	Staff to be aware of the legal implications and company policy in catching, trapping or killing wild animals	Camp Management
	No wild or domesticated wild animals will be kept	Including mammals, birds, reptiles and amphibians	Camp Management
	Implement company domestic animal/pet policy	Especially, no non-neutered domestic cats will be kept	Camp Management
	River boat cruises do not unduly disturb wildlife and cause them to move out of the area	Guides to be trained on not causing disturbance to wildlife, especially key and sensitive species	Camp Management, Guides

	Only catch and release fishing is allowed.	All fish caught needs to be put back into the river. No fish may be taken back to the Camp.	Camp management, Guides
Capitalize on presence of Camp for biodiversity and environmental management	Maximize wildlife viewing opportunities for guests	Encourage guests to go on game viewing activities or botanical walks	Camp Management, Reception, Guides
	Maintain strict anti-poaching policy on fauna and flora	No fauna or flora may be removed from the property by means of poaching	Camp management, Guides
	Participate in specialist monitoring as recommended by ESI Department	As per requirements of programme	ESI Department, Community Liaison and Environmental Officer, Camp Management, Guides
	Maintain integrity of area	Report any suspicious behaviour to management and MEFT and other relevant authorities	Community Liaison and Environmental Officer, Camp Management
	Maintain conservation of the natural area	Keep record and report any significant impacts to the area.	ESI Department, Camp Management, Guides
	Maintain seasonal Carmine Bee-eater guard initiative	Keep record of bird behavior and report any significant impacts to the area. Review event book system once a month	ESI Department, Community Liaison and Environmental Officer, Camp Management, Guides, Bee Eater Guards
Minimise land degradation & erosion	Minimize potential impact of wildfires and reduce risk of fire damage to property	Maintain clear areas around all accommodation. Maintain 'Fire-fighter' on weekly basis.	Camp Management, Maintenance Manager
	Minimize potential impact of wildfires and reduce risk of fire damage to property	Store gas bottles outside kitchen in a closed off cage	OSH Department, Camp Management, Maintenance Manager
	Ensure that tracks used exclusively for Camp activities and are not subjected to erosion	Undertake inspections twice per year and, if required, install additional drainage or	Camp Management, Maintenance Manager

		undertake repairs as required to rehabilitate and reduce erosion	
	Minimize impact of motorboats on exposed banks of Sikunga FPA Channel and Zambezi River	Ensure that guides handle boats with due regard for the potential for wave action to undermine exposed riverbanks. Identify sensitive areas on river used on boat cruises.	Camp Management, Guides
	Minimize erosion by the river by placing sandbags along the riverbanks	Place and replace sandbag as needed. Continuously evaluate options for improved sand bank erosion control.	Camp Management, Maintenance Manager
	Rainfall run-off at Camp site does not cause undue erosion	Regular inspections and if required remedial contouring or drainage	Camp Management
To preserve scenic quality & “sense of place”	Ensure that all buildings/structures and/or renovations are in accordance with the best practice of minimizing visual impact	Regular inspections of screens, pipelines etc. hiding services & installations are functional and repair if required	OPS Department, Camp Management, Maintenance Manager
Road maintenance & erosion control	Ensure roads remain free of obstacles. Maintain road infrastructure.	Fix as required	Camp Management, Maintenance Manager

2.3.1.4. Natural Resources Management

Objective	Management Measure	Monitoring Action & Method	Responsibility
Minimise impact on water resources	Staff are aware of the need to use water wisely	Undertake staff training	ESI Department, Camp Management
	Water Recycling System	Monitor water recycling plant / system. Maintain where needed.	Camp Management, Maintenance Manager
	Water usage & consumption is within the “best practice guidelines”	Monitor water usage on a monthly basis and calculate usage per guest and for staff members and compare against targets	ESI Department, Camp Management

	Water for gardens managed to reduce unnecessary waste	Provide training to gardeners. Water gardens as best identified in seasonal climate.	Camp Management, Maintenance Manager
	Ensure there is no leakage from water systems	Undertake regular inspections of all water pipes	Camp Management, Maintenance Manager
	Maintain low water usage installations	Maintain dual flush, low flow systems	Camp Management, Maintenance Manager
	Guests are aware of the need to use water wisely	Place appropriate information in rooms Emphasizing the need for wise water use	Camp Management
Minimise energy use & wastage	Staff are aware of the need to save energy	Undertake staff training	Camp Management
	Energy use is within the “best practice guidelines”	Install electricity meters. Monitor energy usage monthly.	Camp Management, Maintenance Manager
	Wood for fires is from invasive wood eradication projects, or is from a sustainable source	Investigate sources of wood from a sustainable source. Ensure wood has a permit from Dept. of Forestry	Camp Management
	Guests are aware of the need to save energy	Place appropriate information in rooms Emphasizing the need for energy saving	Camp Management
	Electrical cables are intact	Undertake regular inspections of all electrical cables	Camp Management, Maintenance Manager
	Use low energy bulbs where appropriate	Ensure bulbs which need replacement are done with LED bulbs	Camp Management, Maintenance Manager
Minimise light pollution	Use yellow bulbs & orientate them downwards	Check functioning regularly	Camp Management, Maintenance Manager

2.3.1.5. Pollution Control & Waste Management

Objective	Management Measure	Monitoring Action & Method	Responsibility
Minimise soil, water & air pollution	Disposal procedure for FOG (fats, oils, and grease) in place	Old engine oil used to weatherproof/termite proof poles or sending it to partnered suppliers specialising in recycling of FOGs.	Camp Management, Maintenance Manager

	Spillages of potentially harmful substances must be cleared immediately and disposed of at appropriate site	Inspection and follow-up clean-ups if required	Camp Management, Maintenance Manager
	Functional fat traps	Inspect & clean regularly	Camp Management, Kitchen Staff
	Functional soak-away	Inspect on a regular basis	Camp Management, Maintenance Manager
	Functional & leak free covered drains	Inspect on a regular basis	Camp Management, Maintenance Manager
	Functional and leak-free wastewater pipes	Inspect on a regular basis on repair if required	Camp Management, Maintenance Manager
	Use of environment-friendly soaps & detergents	Ensure that procurement specifies this need	Camp Management, Housekeeping Manager
	Consistent water quality	Test water quality once a year	Camp Management
	No contamination of soil or water by fuels or oil	Ensure that all fuels stored and managed to reduce risk of spillages	Camp Management, Maintenance Manager
	Poisons or pesticides only used when absolutely necessary	Ensure pesticides are only used when absolutely necessary. Environmentally friendly options researched first before utilizing poisons / pesticides.	Camp Management, Housekeeping Manager
Manage solid waste according to best practice standards	Separate organics, metal, glass, paper and plastic waste	Monitor the units of waste produced. Ensure waste (by type) is sent to an appropriate waste management facility.	Camp Management, Maintenance Manager
	Dispose of garden and organic waste in compost heap	Implement a compost heap. Inspect on a regular basis	Camp Management, Maintenance Manager

2.3.1.6. Environmental Emergency Preparedness & Response

Objective	Management Measure	Monitoring Action & Method	Responsibility
	Ensure staff are trained in fire emergency response	Keep record of staff trainings	OHS department, Camp Management

Maintain fire response plan and equipment	Regular inspections and maintenance on fire response equipment (including extinguishers and fire fighter)	Ensure fire extinguishers are within the appropriate range of pressure and serviced on a regular basis. Report faulty fire extinguishers.	OHS Department, Camp Management, All staff concerned
	Maintain fire breaks along borders of Camp	Ensure clear fire breaks are maintained regularly	Camp Management, Maintenance Manager

2.3.1.7. Protection and preservation of heritage resources

Objective	Management Measure	Monitoring Action & Method	Responsibility
Protect heritage resources	Prevent disturbance or damage to known physical heritage features in the area	Inform staff and guests of sensitive heritage areas	ESI department, Collection Managers, Community and Environmental Liaison Officer, Lodge Management, All staff concerned
Implementation of chance finds procedure	Ensure legal compliance if heritage material is discovered	In the event of finding heritage material, all activities in the area are to be halted. Area should be demarcated and NHC, police and other relevant authorities are to be informed.	ESI department, Collection Managers, Community and Environmental Liaison Officer, Lodge Management, Guides
Heritage awareness and compliance	Ensure ongoing heritage awareness and staff compliance	Heritage awareness in inductions; incident recording; restrict access during operation	ESI department, Collection Managers, Community and Environmental Liaison Officer, Lodge Management

Traditional heritage preservation	Ensure respect towards traditional heritage and traditions	Raise awareness of and encourage traditional inclusivity and heritage	Community and Environmental Liaison Officer, Lodge Management
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2.3.2. Environmental monitoring

The following actions form the basis of the primary monitoring activities that shall be executed regularly in order to function within the environmental and operational parameters as prescribed. Overall monitoring and evaluation of the actions and objectives fall to the Camp management in collaboration with the ESI department. The actions below must be undertaken within the context of the measures and monitoring in section 2.3 of this ESMP.

Category	Aspect to be monitored	Specific monitoring	Frequency	Responsibility
Water Management	Water consumption	Liters used /guest/staff and gardens	Daily readings	Camp Management, Maintenance Manager
	Wastewater Treatment Plant	System is functioning correctly	Daily readings	Camp Management, Maintenance Manager
		Volume of water used	Calculated monthly	ESI Department
	Ground water	Water quality	Annually	Camp Management, Maintenance Manager
		Volume of water used	Calculated monthly	ESI Department
	Water reticulation systems	Irrigation pipes/ taps/ sprayers etc	Daily / weekly on-going	Camp Management, Maintenance Manager, All staff concerned
Swimming pool	Clean and correct chlorine levels	Daily/weekly	Camp Management, Maintenance Manager	
Energy & Fuel Management	Energy consumption	kWh used	Monthly readings - Calculated monthly	Camp Management, Maintenance Manager
	Gas installations	Correct functioning	Weekly	Camp Management, Maintenance Manager, All staff concerned

	Fuel consumption	Km driven by Camp vehicles/ boats	Monthly odometer & pump readings	Camp Management, Maintenance Manager
		Litres of petrol per vehicle/boat per week	Weekly	OPS Department
	Fuel and gas storage facilities	Correct storage of fuel and gas to prevent leakage, spillage and fire	Daily/ Weekly	Camp Management, Maintenance Manager, All staff concerned
Pollution Control & Waste Management	Fuel leakages in car parks	Check car parks for any fuel/oil spillages. Remove & replace contaminated gravel	Daily/Weekly	Camp Management, Maintenance Manager
	Drainage system, fat traps & soak away	Leakage, effectiveness of bacteria	Daily	Camp Management, Maintenance Manager
	Appropriate soaps, detergents etc.	All soaps, detergents comply with specifications of being bio-degradable & are suitable for use in septic tanks	Monthly	Camp Management, Housekeeping Manager
	Solid Waste Management	Correct sorting, storage and disposal of inorganic and organic material.	Daily / Weekly	Camp Management, Maintenance Manager, All staff concerned
		Units of waste produced	As required	ESI Department, Camp Management
Camp surrounds	Rainfall	Check & empty rain-gauges	Monthly, or after heavy rains	Camp Management, Maintenance Manager

2.4. Decommissioning Phase

Gondwana Collection, currently does not foresee closure of the lodge. However, should there be an eventual closure, a site-specific decommissioning and rehabilitation plan may be prepared and submitted to the Gondwana Board and relevant stakeholders of the entity including any competent authorities for approval prior to closure. This should include but is not limited to:

- Infrastructure removal: All temporary and permanent lodge infrastructure, including buildings, services and access structures, will be dismantled and removed as far as practicable, unless otherwise agreed with the landowner and competent authority.
- Waste removal: All demolition materials, hazardous substances and general waste will be collected, stored and disposed of at approved waste disposal facilities.
- Site closure: The site will be secured during closure activities to prevent unauthorized access. All services will be safely disconnected, and any potential sources of contamination will be identified and managed.
- Rehabilitation: All disturbed areas will be rehabilitated to a stable condition as far as practicable, using locally appropriate materials and vegetation. Erosion control measures will be implemented where necessary, and any heritage resources encountered during closure will be managed in accordance with applicable procedures.

3. Conclusion

The Environmental and Social Management Plan acts as workable tool that is integrated into daily camp operations without undermining guest experience or operational efficiency. The management actions, monitoring schedule and assigned responsibilities give camp management and staff practical guidance on how to protect biodiversity, use water and energy efficiently, manage waste, and uphold community and heritage commitments in a consistent manner. With ongoing training, routine monitoring and periodic review of procedures, the plan will enable the Zambezi Mubala Camp team to identify issues early, correct non-compliances, and progressively improve environmental performance over the lifetime of the operation.

4. Annexures

Annexure 1: Declaration of Authorship