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REPORT: **BACKGROUND INFORMATION DOCUMENT FOR** **THE EXISTING LODGE DAMARALAND, KUNENE** **REGION, NAMIBIA.**

PROJECT NUMBER: ECC-141-475-BID-04-D

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1 BACKGROUND INFORMATION DOCUMENT

1.1 PURPOSE OF THIS DOCUMENT

Environmental Compliance Consultancy (Pty) Ltd (ECC) has been contracted by Damaraland Lodge CC to develop an environmental management plan (EMP), for the tourism-related activities at the existing and operational Lodge Damaraland situated on Portion 14 of the farm Khorixas Townlands no 884, Kunene Region, Namibia. Consistent with the Environmental Management Act, 2007 and its regulations. An environmental clearance certificate application will be submitted to the Ministry of Environment, Forestry and Tourism (MEFT) for the Project, which is the relevant authority to make a Record of Decision (RoD) with regards to the Project.

For this project, ECC proposes to only develop a comprehensive environmental management plan (EMP) for the following reason Lodge Damaraland is situated in the Khorixas townland and is on a portion of land which is only 5.5 hectares in size. Small lodges by nature have limited environmental footprints and low potential for significant adverse impacts on their surroundings. Thus, subjecting them to a full-blown Environmental Impact Assessment (EIA) could be excessively resource intensive.

The purpose of this Background Information Document (BID) is to provide MEFT and the Interested and Affected Parties (I&APs) a background to the Project and to invite I&APs to register as part of the environmental and social impact assessment (ESIA) process.

All those who register as an I&AP will be kept informed throughout the process. Registration provides a platform for participants to submit comments, concerns, or recommendations regarding the Project. This BID includes the following information:

- The project and location
- Infrastructure on site
- How the application process works
- Next steps and the way forward

1.2 DESCRIPTION OF THE PROJECT

Lodge Damaraland has been fully built and is currently in operation. Its construction took place since the start of 2023, culminating in the opening of the lodge to tourism in August 2023. Situated adjacent to the D2625 district road on Portion 14 of farm Khorixas Townlands no 884 in the Kunene Region, Namibia. Lodge Damaraland is strategically positioned, in Damaraland (2.2 km from Khorixas) and near Etosha National Park as depicted in Figure 1.

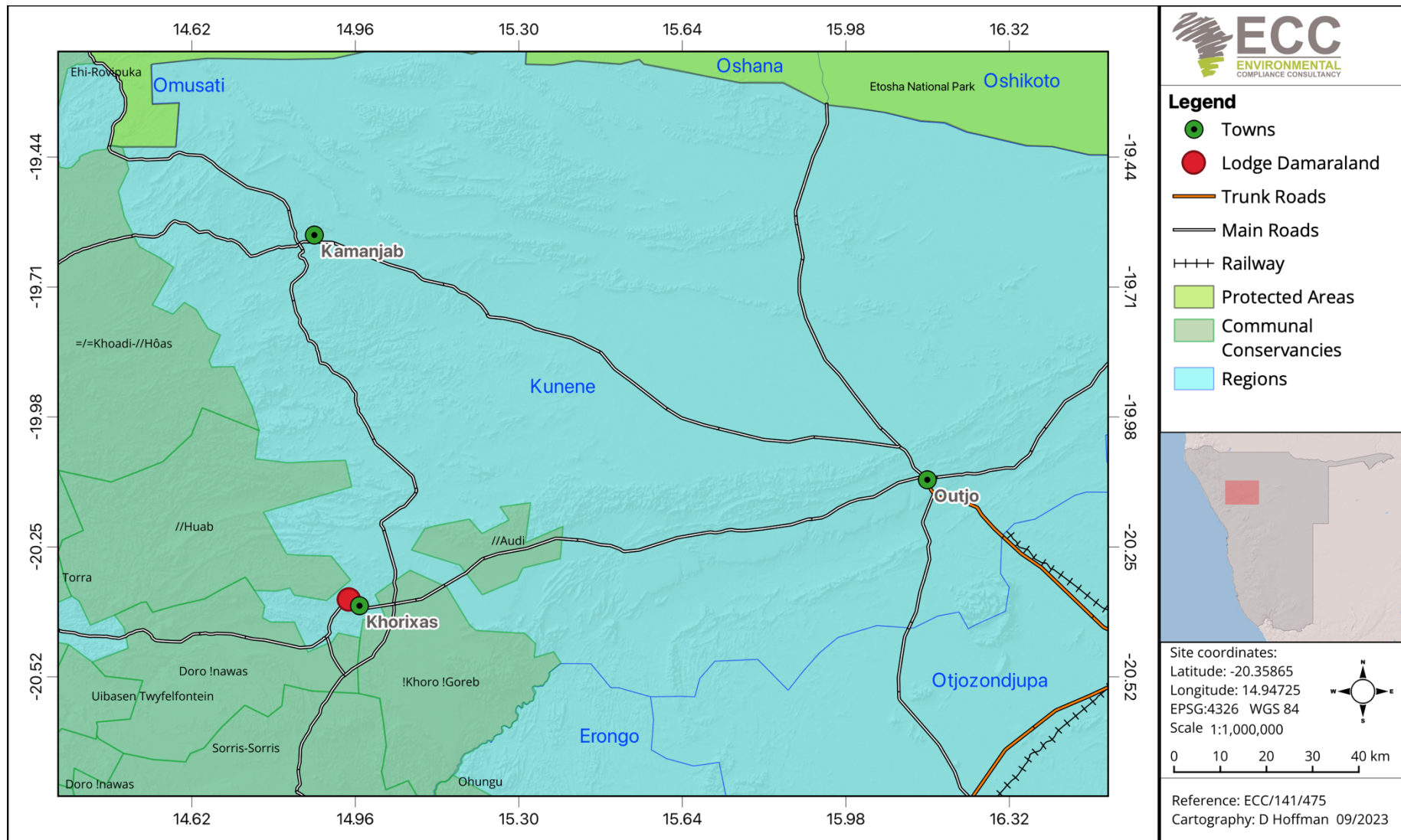


Figure 1 – Lodge Damaraland Locality Map

In terms of Section 32 (1) of the Environmental Management Act, No. 7 of 2007, ECC has determined that MEFT is the competent authority for the Project. The tourism-related activities trigger the listed activities as per the Environmental Management Act Regulations. The relevant activities list is provided later in the BID.

1.3 NEED FOR THE PROJECT

Namibia is a tourism destination for people around the world due to its various unique and popular geological features, wildlife attractions and popular sites across the country. The tourism industry is a major contributor to the Gross Domestic Product (GDP) of Namibia and plays an important part in socio-economic sustainability and wildlife conservation within the country.

There is a compelling need for tourism lodges like Lodge Damaraland in Namibia, particularly in the vicinity of Damaraland and Etosha National Park.

Lodges in Damaraland can contribute to sustainable tourism practices that benefit local communities, promote conservation efforts, and ensure the preservation of this pristine wilderness for future generations to enjoy.

1.4 OPERATIONAL PHASE

All infrastructure falls within the boundaries of portion 14 of the farm Khorixas Townlands no 884, which is 5.5 ha in size. The following infrastructure is on the project site:

- Main building with a restaurant,
- Swimming pool,
- 30 guest rooms, and
- 1 manager house.

The lodge has the capacity to house around 86 guests per day.

1.5 CONSIDERATION OF ALTERNATIVES

Best practice environmental assessment methodology calls for consideration and assessment of alternatives to a proposed project. In a project such as this one, it is not possible to identify an alternative site due to the lodge already being constructed and in operation since August 2023.

During the project, alternatives will take the form of consideration of optimisation and using eco-friendly solutions to reduce potential impacts. This will be addressed in the EMP for the Project.

2 THE ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT PROCESS

The ESIA for the Project is being conducted by ECC and will be undertaken in terms of the Environmental Management Act, 2007 and its regulations. The process followed for this ESIA is set out in the flowchart in Figure 2.

A final decision relating to the above-mentioned application will be made by the Ministry of Environment, Forestry and Tourism (MEFT), Department of Environmental Affairs (DEA).

For this Project, ECC proposes to only develop a comprehensive EMP, which will cover the following:

1. Screening phase (completed)
2. Evaluation of potential impacts and the drafting of an Environmental Management Plan (EMP) and submission to the appropriate competent authority.

The main objectives of the EMP will be to:

- a) Provide information describing the Project and associated activities; and
- b) Develop management and mitigation measures associated with any identified potential impacts where necessary.



Figure 2 - Flowchart of the environmental and social assessment process

2.1 SCREENING

A review of the Project was undertaken and the screening findings against the listed activities were identified, the findings of which are summarised in Table 1.

Table 1- Listed activities triggered by the project

Listed activity	EIA screening finding
<p>Waste management, treatment, handling and disposal activities (2.3) The import, processing, use and recycling, temporary storage, transit or export of waste.</p>	<ul style="list-style-type: none"> - This Project involves the temporary storage of general waste. Waste is collected by the Municipality and disposed of at the Municipal Landfill Site.
<p>Tourism development activities (6.) The construction of resorts, lodges, hotels or other tourism and hospitality facilities.</p>	<ul style="list-style-type: none"> - The following infrastructure has been constructed on site: Main building with Restaurant, swimming pool, 30 guest rooms and 1 manager house.
<p>Water resource developments (8.1) The abstraction of ground or surface water for industrial or commercial purposes.</p>	<ul style="list-style-type: none"> - There is one borehole on-site, which is unfit for human consumption which is used for the watering of indigenous tree species on-site.
<p>Hazardous substance treatment, handling and storage (9.1) The manufacturing, storage, handling or processing of a hazardous substance defined in the Hazardous Substances Ordinance, 1974.</p>	<ul style="list-style-type: none"> - A Septic tank system has been installed on-site and included the following: Septic tank with 2 tanks (3456 l and 1728 l) with a 7 m soak away trench on the 2nd tank outlet. 4 x Septic tanks on-site (same design, but 2 different sizes).

Listed activity	EIA screening finding
<p>(9.2) Any process or activity which requires a permit, licence or other form of authorisation, or the modification of or changes to existing facilities for any process or activity which requires an amendment of an existing permit, licence or authorisation or which requires a new permit, licence or authorisation in terms of a law governing the generation or release of emissions, pollution, effluent or waste.</p>	
<p>Land use and development activities 5.3) Construction of veterinary protected area or game proof and international boundary fences.</p>	<ul style="list-style-type: none"> - A fence has been constructed around the lodge for security purposes.
<p>Other activities (11.2) Construction of cemeteries, camping, leisure and recreation sites.</p>	<ul style="list-style-type: none"> - The lodge does provide leisure and recreation activities.

2.2 STAKEHOLDER ENGAGEMENT

The neighbouring farmers will receive a letter notifying them of the intent to apply for an environmental clearance certificate and receive invitations to register as I&APs. A Period of time for input will be granted for the Environmental Assessment Practitioner (EAP) to receive any additional concerns or comments from registered I&AP's.

2.3 DRAFT ENVIRONMENTAL MANAGEMENT PLAN

An EMP shall be developed for the Project setting out auditable management actions for the Project to ensure careful and sustainable management measures are implemented for their activities in respect of the surrounding environment and community. The EMP becomes the legally binding commitment upon approval of the EMP and issuing of the environmental clearance certificate. Environmental clearance certificates are issued for a period of 3 years and renewal is subject to compliance with the provisions and conditions of the environmental clearance certificate.

3 THE WAY FORWARD – PUBLIC PARTICIPATION

Public participation is an important part of the ESI process. It allows you, the public and stakeholders to raise concerns or provide valuable local environmental knowledge that can benefit the assessment process. At this phase, ECC will perform the following:

- Prepare and submit the application for the environmental clearance certificate in the prescribed manner
- Identify relevant key stakeholders, authorities, and municipalities hereafter referred to as I&APs
- Submit the EMP to the competent authority and Environmental Commissioner for a record of decision

Your request for registration as an I&AP as well as any comments on the BID or Project must be submitted in writing and can be emailed using the details in the contact us section below. Registration as an I&AP for the Project can be completed online on ECCs website on the Projects page, or by using this link: <https://eccenvironmental.com/download/the-operation-of-the-existing-lodge-damaraland-on-portion-14-of-the-farm-khorixas-townlands-no-884-kunene-region-namibia/>.

Registration as an I&AP should be submitted on or before **25 November 2023**.

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

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