

Submitted to: Toshari Lodge CC  
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# **REPORT:** **BACKGROUND INFORMATION DOCUMENT FOR THE EXISTING TOSHARI LODGE, KUNENE REGION, NAMIBIA.**

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## **TITLE AND APPROVAL PAGE**

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# 1 BACKGROUND INFORMATION DOCUMENT

## 1.1 PURPOSE OF THIS DOCUMENT

Environmental Compliance Consultancy (ECC) has been contracted by Toshari Lodge CC to conduct an environmental and social impact assessment (ESIA) and develop an environmental management plan (EMP), for the tourism-related activities at the existing and operational Toshari Lodge on portion 1 of Farm Afguns 447, 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 reasons: Toshari initially opened for tourism around 2000, predating the promulgation of the Environmental Management Act (EMA), No.7 of 2007. Secondly, small lodges like Toshari Lodge 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 ESIA process works
- Next steps and the way forward

## 1.2 DESCRIPTION OF THE PROJECT

Toshari Lodge has been fully built and is currently in operation. Its construction took place in several phases, culminating in the opening of the lodge to tourism in the year 2000. The most recent additions to the lodge, some additional rooms, were completed in 2023. Situated adjacent to the C38 main road on portion 1 of Farm Afguns 447. Toshari Lodge is strategically positioned, approximately 26 km to the south of Etosha National Park's Anderson Gate and about 73 km to the north of Outjo, as depicted in Figure 1.



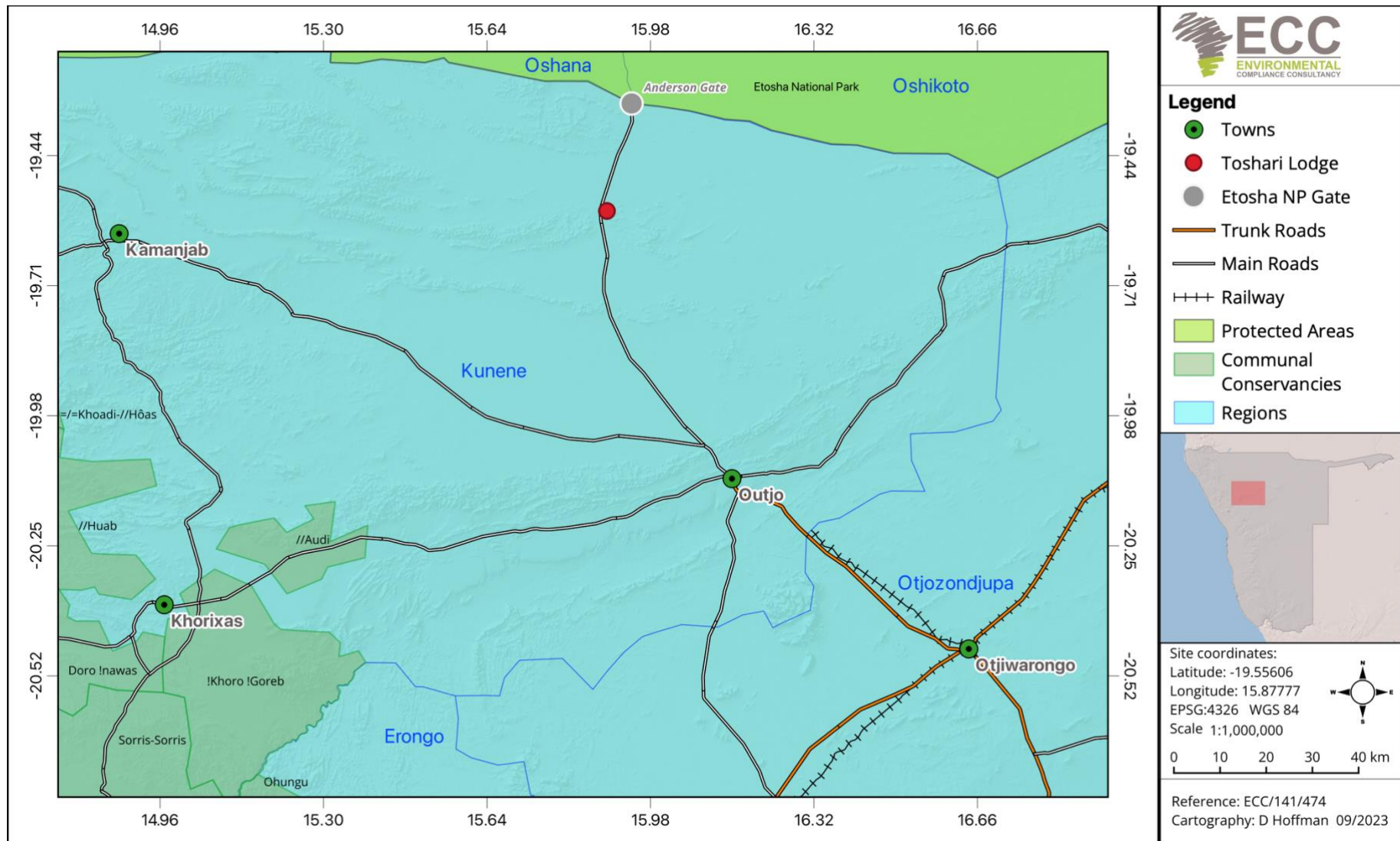


Figure 1 – Toshari Lodge Locality Map

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 Toshari Lodge, particularly in the vicinity of Etosha National Park in Namibia. Etosha National Park is a renowned wildlife sanctuary, attracting visitors from across the globe eager to witness its diverse and unique flora and fauna. Toshari Lodge, along with similar establishments, offers comfortable and eco-conscious lodging for tourists, providing a safe and convenient base from which to explore the park's wonders. These lodges also play a vital role in promoting responsible tourism, fostering awareness about the fragile environment, and contributing to local economies through job creation and community engagement. Thus, they fulfil a crucial role in enhancing the overall visitor experience while safeguarding the natural treasures of Namibia.

### 1.4 OPERATIONAL PHASE

The following infrastructure is on the Project site:

- Guest rooms (x38), guide rooms (x5) and manager houses (x2).
- Main building with dining area, bar, offices, curio shop, kitchen, laundry and storage rooms.
- Swimming pools (x3)
- Staff accommodation blocks (x3), and
- Conference rooms

The lodge has the capacity to house around 100 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 2000.

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.

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## **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 mainly 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.

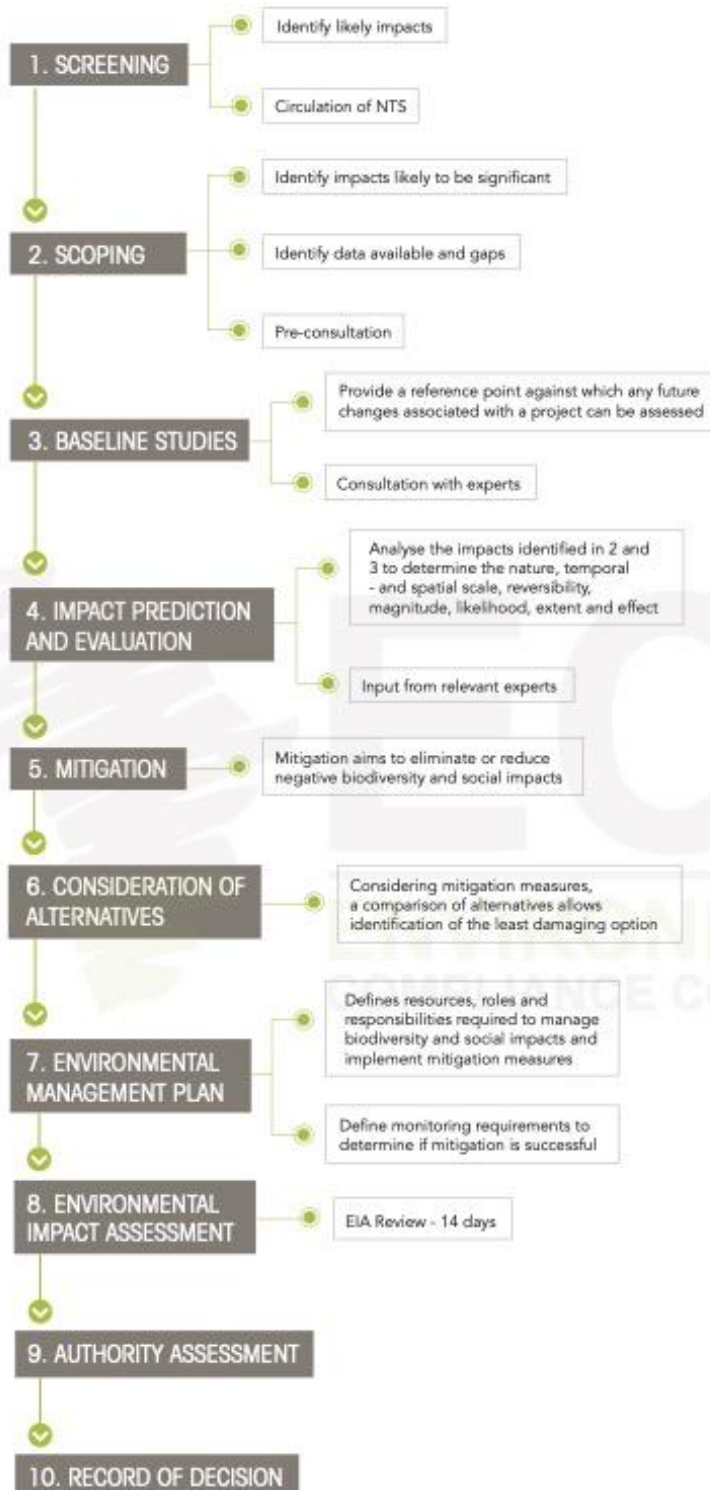


Figure 2 - Flowchart of the environmental and social assessment process



## 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><b>ENERGY GENERATION, TRANSMISSION AND STORAGE ACTIVITIES</b> (1.a) The construction of facilities for the generation of electricity;</p>	<p>- A 129 kWp solar plant with a battery room (with 577 kWh storage capacity) has been constructed and is used to produce electricity for the lodge.</p>
<p><b>WASTE MANAGEMENT, TREATMENT, HANDLING AND DISPOSAL ACTIVITIES</b> (2.3) The import, processing, use and recycling, temporary storage, transit or export of waste.</p>	<p>- Food waste is removed from the site by a contractor and general waste is disposed of by the Lodge at the municipal landfill site in Outjo.</p>
<p><b>TOURISM DEVELOPMENT ACTIVITIES</b> (6.) The construction of resorts, lodges, hotels or other tourism and hospitality facilities.</p>	<p>- The following infrastructure has been constructed on site: Guest rooms (x38), guide rooms (x5) main building with a dining area, bar, offices, curio shop, kitchen, laundry, and storage rooms. swimming pools (x3), managers houses (x2), staff accommodation blocks (x3), conference rooms</p>
<p><b>WATER RESOURCE DEVELOPMENTS</b> (8.1) The abstraction of ground or surface water for industrial or commercial purposes.</p>	<p>- Water is sourced from two existing boreholes with a demand of approximately 20 m<sup>3</sup> per day. - There are 5 x 5000 L plastic tanks that are used on-site to store water.</p>

LISTED ACTIVITY	EIA SCREENING FINDING
<p><b>HAZARDOUS SUBSTANCE TREATMENT, HANDLING AND STORAGE</b></p> <p>(9.1) The manufacturing, storage, handling or processing of a hazardous substance defined in the Hazardous Substances Ordinance, 1974.</p> <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>	<ul style="list-style-type: none"> <li>- Two 2000-litre diesel tanks are installed on-site and used to support daily lodge activities (i.e., vehicles).</li> <li>- A 2-stage septic tank with a french drain system has been installed on-site to service the lodge during the operational phase.</li> </ul>
<p><b>LAND USE AND DEVELOPMENT ACTIVITIES</b></p> <p>5.3) Construction of veterinary protected area or game proof and international boundary fences.</p>	<ul style="list-style-type: none"> <li>- A fence has been constructed around the lodge for security purposes.</li> </ul>
<p><b>OTHER ACTIVITIES</b></p> <p>(11.2) Construction of cemeteries, camping, leisure and recreation sites.</p>	<ul style="list-style-type: none"> <li>- The lodge does include leisure and recreation activities and 3 private camping sites have been constructed on site.</li> </ul>

## 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.

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### **3 THE WAY FORWARD – PUBLIC PARTICIPATION**

Public participation is an important part of the ESIA 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 apply 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.

Registration as an I&AP should be submitted on or before **15 December 2023**.

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

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