



Submitted to: Purple Rain Investments (Pty) Ltd
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BACKGROUND INFORMATION DOCUMENT:

THE PROPOSED CONSTRUCTION AND OPERATION OF A TOURISM LODGE IN THE MAHANGO CORE AREA WITHIN THE BWABWATA NATIONAL PARK, KAVANGO EAST REGION, NAMIBIA

PROJECT NUMBER: ECC-155-557-BID-03-A

REPORT VERSION: REV 01

DATE: 30 OCTOBER 2024





**The Proposed construction and operation of a tourism lodge in the
Mahango Core Area within the Bwabwata National
Park, Kavango East Region, Namibia**
Purple Rain Investments (Pty) Ltd

TITLE AND APPROVAL PAGE

Project Name: The Proposed construction and operation of a tourism lodge in
the Mahango Core Area within the Bwabwata National Park,
Kavango East Region, Namibia

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TERMS AND ABBREVIATIONS

Abbreviation	Description
BID	background information document
COVID-19	Coronavirus 2019
DEA	Directorate of Environmental Affairs
DWA	Department of Water Affairs
DWNP	Directorate of Wildlife and National Parks
EAP	environmental assessment practitioner
ECC	Environmental Compliance Consultancy (Pty) Ltd
ESIA	environmental and social impact assessment
EMA	Environmental Management Act No. 7 of 2007
EMP	environmental management plan
ESIA	environmental and social impact assessment
GDP	gross domestic product
ha	hectare
I&APs	interested and affected parties
km	kilometre
Ltd	limited
m ³	cubic meters
MAWLR	Ministry of Agriculture, Water and Land Reform
MEFT	Ministry of Environment, Forestry and Tourism
Pty	proprietary
ToR	terms of reference
RAMSAR	An international treaty established to protect, conserve and ensure sustainable use of wetlands worldwide.

1 BACKGROUND INFORMATION DOCUMENT

1.1 PURPOSE OF THIS DOCUMENT

This document has been compiled to provide interested and affected parties (I&APs) with an introduction to the scope of work for the proposed construction and operation of a tourism lodge in the Mahango Core Area of Bwabwata National Park, in the Kavango East Region, Namibia.

The Bwabwata National Park forms a transboundary corridor for seasonal wildlife migration and dispersal between Angola, Botswana, Namibia and Zambia. The park is zoned into core areas namely, Mahango Core Area (245 km²), Kwando Core Area (1 345 km²), Multiple Use Area (4 055 km²) and Buffalo Core Area (629 km²). The zoned areas are intended to offer special wildlife protection, enhance rural economic activities and regulate community-based tourism activities.

Environmental Compliance Consultancy (Pty) Ltd. (ECC) has been engaged by Purple Rain Investment (Pty) Ltd. (herein referred to as the Proponent) as the environmental assessment practitioner (EAP) to undertake an environmental and social impact assessment (ESIA) for the proposed Project in terms of the Environmental Management Act No. 7 2007 (EMA) and its Regulations of 2012.

This background information document (BID) serves to invite I&APs to register as part of the environmental scoping and assessment process. A platform for I&APs to submit comments, concerns or recommendations will be established and all registered I&APs will be informed about the proposed Project as the ESIA process advances.

This BID includes the following:

- The proposed Project and location;
- The necessity of the Project, potential benefits or adverse impacts anticipated;
- The alternatives that were considered;
- How the ESIA process works;
- The public participation process and how to become involved; and
- Next steps and the way forward.

1.2 DESCRIPTION OF THE PROPOSED PROJECT

The proposed Project area is currently utilised as a campsite. The campsite will be redeveloped and refurbished into a tourist's attraction site. The proposed Project involves the construction of eight (8) accommodation units (bungalows) and supporting infrastructure to uniformly operate as a tourism lodge. The Proponent has been granted tourism concession rights for this development. To enhance the visitor's experience, the lodge will offer a range of recreational activities, including game viewing drives and river game viewing and photography from a boat in the Kavango River.

Commitments will be made to ensure construction and operational activities align with best environmental practices as outlined in the park's management plan.

1.3 PROJECT LOCATION

The Project site is approximately 35 hectares (ha) in size and is situated within the Mahango Core Area, on the western bank of the Kavango River, approximately 25 km southeast of Divundu. The Project site can be accessed via the B8 trunk road (Trans-Zambezi highway) and the C48 district road connecting Divundu with the Mohembo border post (Figure 1). Local rural developments are governed by the Divundu Village Council, while MEFT manages the national park services through national park authorities, communal conservancies and community forests. This approach preserves natural and cultural resources for the benefit of both current and future generations.

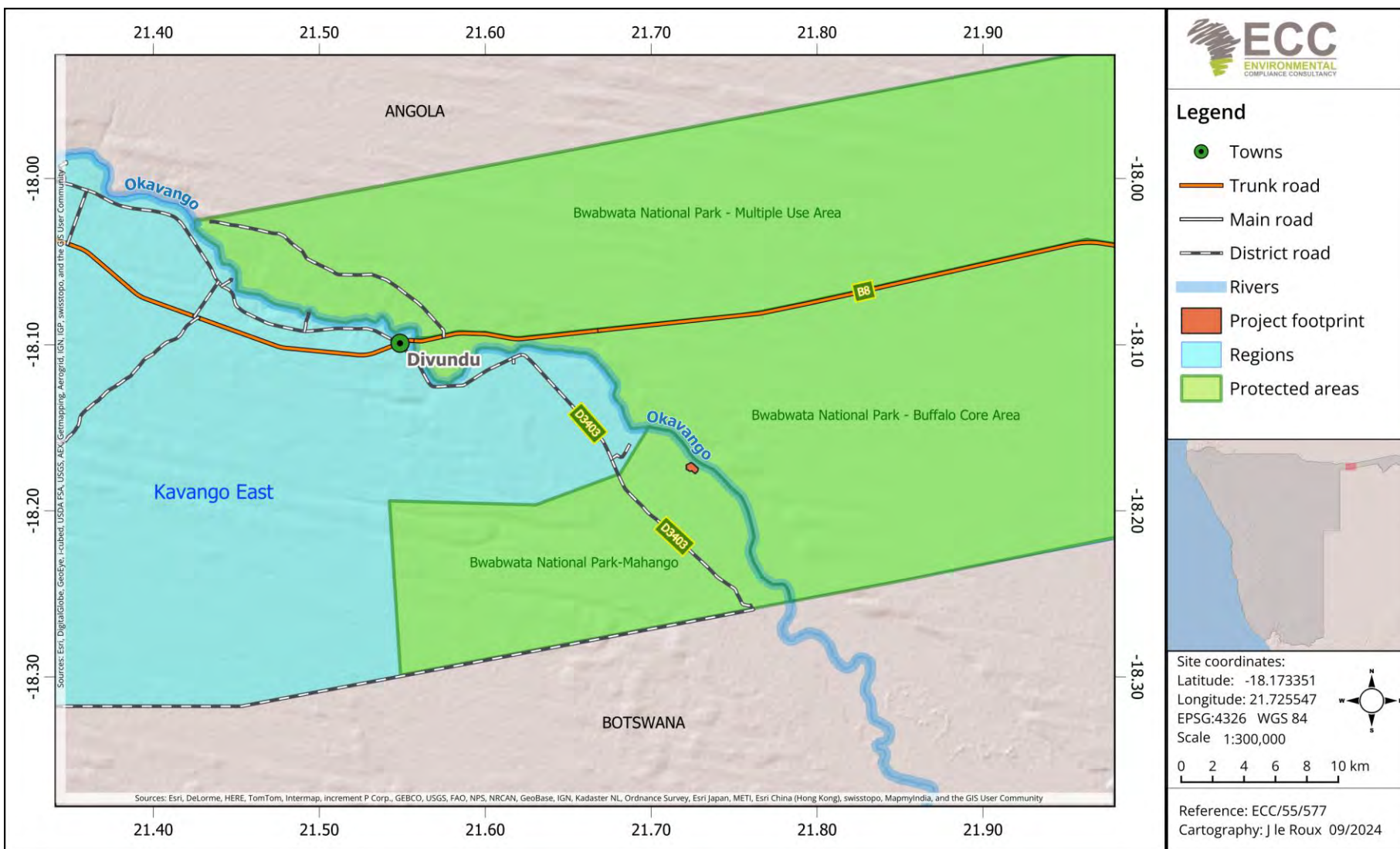


Figure 1 - Location of the proposed Project site

1.4 NEED FOR THE PROJECT

Namibia is a sought-after tourism destination for travellers worldwide due to various popular features and sites of attraction across the country. The tourism industry contributes to the gross domestic product (GDP) of Namibia. The tourism industry of most African countries significantly recovered since the resumption of international travels, post the COVID-19 global pandemic. The proposed Project capitalises on the local competitive tourism and market industry and enhances ecotourism by balancing economic development with environmental conservation and social responsibility.

The proposed Project is expected to be beneficial by creating both temporal and permanent jobs. It is anticipated that approximately 10 - 30 employees will be employed or contracted during the construction phase, while 30 permanent employees will be required during the lodge operations. It is anticipated that these employees will be from the local region. This will contribute to the economic well-being of the community and development of the Divundu Region.

1.5 PROJECT DETAILS - CONSTRUCTION AND OPERATIONAL PHASES

1.5.1 CONSTRUCTION

The site has been established and minimal vegetation will be cleared. No earthmoving equipment will be used during the construction phase. The foundation will be established, with no other major land disturbances expected. The construction phase is expected to commence in the first quarter of 2025 and will include the following:

- Construction of eight double units. The lodge will accommodate 16 guests at full capacity;
- Ablution facilities will be built and connected to conservancy tanks and septic tanks with a French drain soak-away system;
- Construction of supporting infrastructure which includes kitchen, restaurant, bar, fire pit, curio shop, boat and launch, spa and gym, and jacuzzi/splash pool per accommodation unit;
- Temporary contractors camp, ablution facilities and workshop;
- One borehole will be drilled to supply water required for the construction and operational phases (approximately 10 cubic meters (m³) of water per day will be required during both phases);
- Construction of a solar plant and battery room to provide energy required during the lodge operation; and
- Construction of a staff village.

1.5.2 OPERATION

The lodge operations are expected to commence in mid to end 2025. The proposed Project is envisioned to be a fully functional tourism lodge and will provide tourists and photographic

enthusiasts with a luxury African safari and lodging experience. Experienced guides will be hired to lead expeditions in the park. Field guides will be tasked with other recreational activities such as game viewing drives (on established roads) and boating (river game viewing and photography) from a boat in the kavango River. Overall, the Project will seek to promote ecotourism, build a holistic relationship with the surrounding communities through cultural interactions, engage in best environmental practices, and abide to the park's resource use policies and wildlife management plans to ensure ecosystem services benefit other park users. It is estimated that 30 employees will be recruited to assist during lodge operations.

1.6 CONSIDERATION OF ALTERNATIVES

Best practice environmental assessment methodology calls for consideration and assessment of alternatives to a proposed Project.

The abandoned Kwetshe camp was considered as an alternative Project site. However, its susceptibility to noise and light pollution from the nearby Mohembo settlement and bridge in Botswana presented a significant drawback. Tourism is a competitive industry in Namibia; therefore, visitors are unlikely to be attracted to a location with disruptive surroundings.

During the ESIA assessment, alternatives will take the form of consideration of optimisation and use of eco-friendly solutions to reduce potential impacts.

2 THE ENVIRONMENTAL IMPACT ASSESSMENT PROCESS

The ESIA is undertaken in terms of the EMA and its 2012 Regulations. The process followed for this ESIA is set out in the flowchart in Figure 2. The construction and operation of the tourism lodge triggers various listed activities as per the EMA and its Regulations. The activities triggered are provided in Table 1.

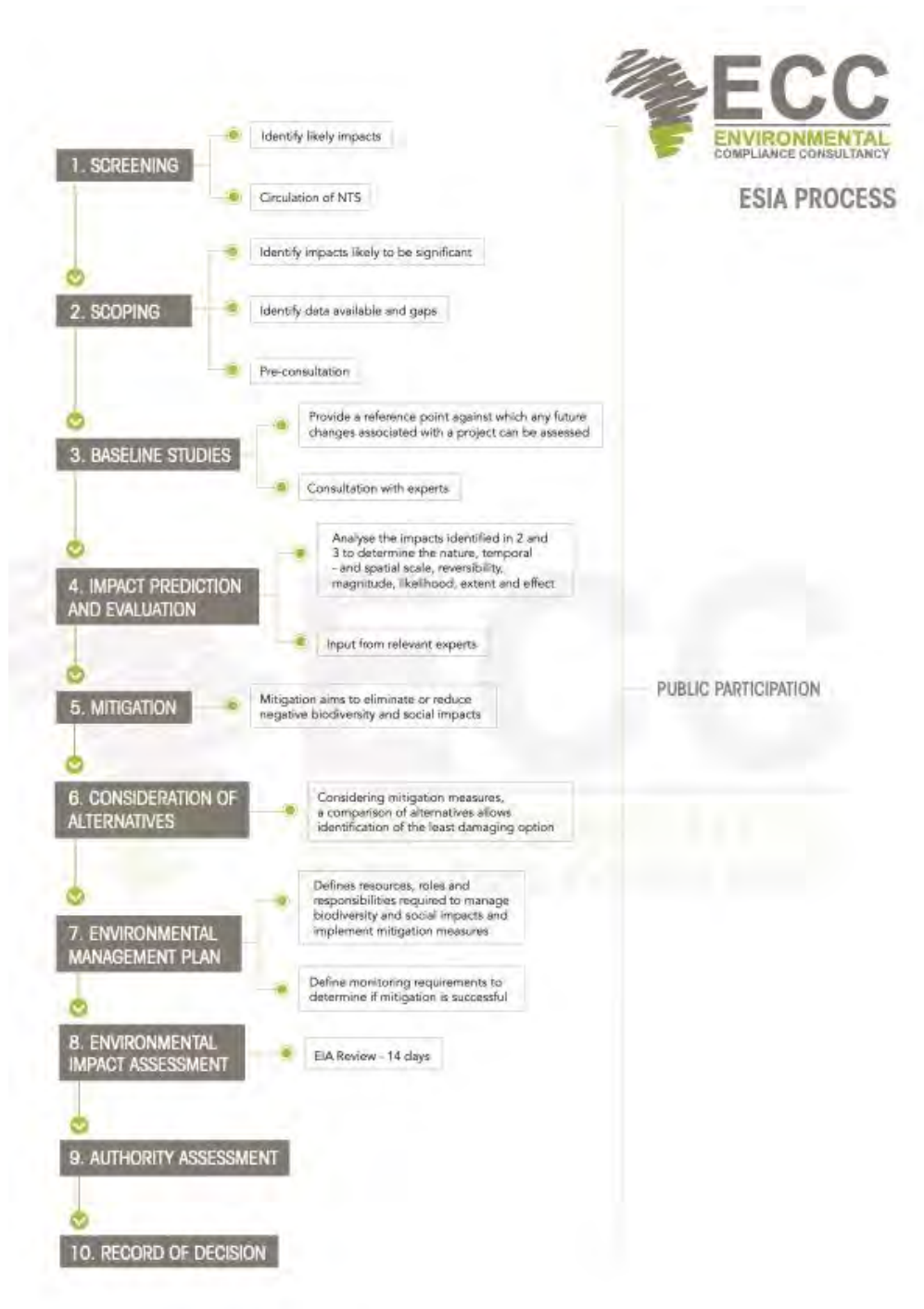


Figure 2 - Flowchart of the environmental and social assessment process

The Ministry of Environment, Forestry and Tourism (MEFT) has been identified as the competent authority and will be consulted and engaged during the ESIA process. The relevant departments to be consulted include the Department of Environmental Affairs (DEA) and the Directorate of Wildlife and National Parks (DWNP). A final decision on the environmental clearance certificate application relating to the Project will be made by the DEA.

The environmental scoping and impact assessment process will include:

1. Screening Phase (completed);
2. Scoping Phase, which includes baseline studies and consultation with key stakeholders and I&APs; and
3. Assessment Phase which includes impact prediction and evaluation of alternatives, assigning mitigation measures and developing conceptual monitoring plans. This phase culminates in the drafting of the ESIA report and draft environmental management plan (EMP) and submission to the appropriate competent authorities.

The main objectives of the ESIA are to:

1. Provide information describing the proposed Project and associated activities;
2. Provide an independent environmental impact social assessment of the activities associated with the proposed Project; and
3. Develop management and mitigation measures associated with any identified potential impacts, where necessary.

2.1 SCREENING

A review of the proposed Project was undertaken, and the findings of the screening exercise were compared against the listed activities; the findings are summarised in Table 1.

Table 1 - Listed activities triggered by the proposed Project

Listed activity as defined by the Regulations of the EMA	Screening findings and relevance to the Project
Energy generation, transmission and storage activities 1. The construction of facilities: (a) The generation of electricity. (b) The transmission and supply of electricity.	– Each lodge unit will have its own solar and battery plant. Energy will be generated and to all lodge infrastructure. The proposed Project will be self-sufficient and no connection to external energy sources is foreseen. – Diesel generators will be used during the construction phase.

Listed activity as defined by the Regulations of the EMA	Screening findings and relevance to the Project
Waste management, treatment, handling, and disposal activities (2.1) The construction of facilities for waste sites, treatment of waste and disposal of waste. (2.3) The import, processing, use and recycling, temporary storage, transit or export of waste.	– Waste generated onsite, including construction waste will be removed and disposed of at the municipal waste disposal site in Divundu. – Ablution facilities will be built. For effective wastewater management, the ablution facilities will be connected to conservancy tanks, septic tanks which in turn will be linked to the French drain soak away system. A licence will be required from the Department of Water Affairs (DWA) for this system, in terms of the newly promulgated Water Resources Management Act No. 11 of 2013.
Forestry activities (4.) The clearance of forest areas, deforestation, afforestation, timber harvesting or any other related activity that requires authorisation in terms of the Forest Act, 2001 (Act No.12 of 2001) or any other law.	– Minimal vegetation clearing will be required to establish the lodge unit's foundations and associated infrastructure. No protected trees will be cut down. Landscaping may be considered to enhance an aesthetic appeal for the lodge.
Tourism development activities (6) The construction of resorts, lodges, hotels or other tourism and hospitality facilities.	– A tourism lodge will be constructed, comprising of eight (8) accommodation units, a restaurant, bar, fire pit, kitchen, reception area, parking lot, spa and gym and staff accommodation units. – Any permanent development within 100 m of a water course requires a licence from the DWA of the Ministry of Agriculture, Water and Land Reform.
Water resources development (8.1) The abstraction of ground or surface water for industrial or commercial purposes.	– A borehole will be drilled to supply water required for the construction and operation phase. It is anticipated that approximately 10 m³ of water per day will be required daily during both phases. A borehole and abstraction licence, approved by the

Listed activity as defined by the Regulations of the EMA	Screening findings and relevance to the Project
(8.6) Construction of industrial and domestic wastewater treatment plants and related pipeline systems. (8.8) Construction and other activities within watercourses within flood lines. (8.9) Construction and other activities within a catchment area.	Department of Water Affairs (DWA) in terms of the newly promulgated Water Resources Management Act No.11 of 2013 will be required. – A wastewater management system will be constructed. This includes conservancy tanks and septic tanks connected to a French drain soak away drainage system. Licences will be required from the DWA for this system, in terms of the newly promulgated Water Resources Management Act No.11 of 2013. – The Project falls within a water-controlled area where water is controlled and managed by the Ministry of Agriculture, Water and Land Reform (MAWLR). – The Project borders the Okavango River Basin to the east. The basin comprises of river networks, the headwaters of which are in Angolan highlands stretching into Botswana where it forms the Okavango Delta. The Okavango Delta is declared a RAMSAR site.
Other activities (11.2) Construction of cemeteries, camping, leisure and recreation sites.	– The existing campsite will be redeveloped and transformed into an operational lodge.

2.2 SCOPING

The scoping phase is directed towards defining the range and nature of anticipated potential impacts that may have significance to the biophysical and social environments at the scale of the proposed operations. The appropriate available data and the literature are identified forming the starting point for the assessment.

2.2.1 BASELINE STUDIES

For the proposed Project, baseline information will be obtained through the existing studies such as the Bwabwata National Park Management Plan 2013/2014 to 2017 /2018. The focus will be on environmental receptors that could be affected by the proposed Project. ECC will also engage the

stakeholders, I&APs and the Proponent to seek input into the assessment, and should it be required, specialist studies will be initiated.

2.2.2 STAKEHOLDER/I&APS ENGAGEMENT

The public and key stakeholders receive invitations to register as I&APs. After the presentation of the proposed Project and ESIA process through the defined public consultation process, a period for input will be granted for the environmental assessment practitioner (EAP) to receive any additional concerns or comments from registered I&APs. All feedback from the initial public consultation process will be incorporated into the scoping report.

2.2.3 TERMS OF REFERENCE

Based on the stakeholder engagement through the defined public consultation process, including any written correspondence and the baseline studies, the terms of reference (ToR) for the impact assessment may be finalised and submitted to the office of the Environmental Commissioner for approval.

2.3 SCOPING AND IMPACT ASSESSMENT REPORT

The scoping and impact assessment report will be drafted and made available to the registered I&APs for comment before being submitted to the competent authority (i.e. MEFT). The scoping section of the report will contain a description of the Project and the biophysical and socio-economic environments, the specialist baseline studies (if any) and the stakeholder engagement report.

The impact assessment section will include ECC's ESIA methodology, a discussion on the potential impacts that have been identified and are likely to be triggered, an evaluation of the impact ratings and the management and mitigation measures to minimise the impacts.

2.3.1 POTENTIAL ENVIRONMENTAL IMPACTS

The potential social and environmental impacts should be considered with due regard to the nature and scale of the proposed Project. The potential environmental impacts that have been anticipated may include the following:

- Potential impact on the viewshed in the surrounding Project area;
- Impact on the tourism sector;
- Potential for lodge infrastructure to infringe delineated river flood lines and riparian buffer zones;
- Potential alteration of natural surface water flow patterns;
- Artificial light impacts on nocturnal wildlife;
- Job creation, skills development and transferability;
- Potential disturbance to heritage objects or sites;

- Potential contamination of surface, groundwater resources and vital shared water resources from the French drain system; and
- Potential human wildlife conflict and direct interaction with wildlife.

2.4 ENVIRONMENTAL MANAGEMENT PLAN

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

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, as well as aid the planning process for the scoping phase of the defined 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, municipalities, environmental groups and interested or affected members of the public, hereafter referred to as I&APs;
- Carry out a public consultation process in accordance with Regulation 21 of the EMA 2007 including:
 - o Distribute the BID for the proposed development and operation of the tourism lodge (this document).
 - o Advertise the environmental application and call for registration of I&AP's in two national newspapers.
 - o Open an I&AP register and record all comments of I&APs and present such comments, as well as responses provided by ECC, in the comments and responses report, which will be included in the scoping report that shall be submitted with the application.
- Prepare a scoping and impact assessment report and provide same to registered I&APs for comment; and
- Submit the scoping report and the I&AP comments 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 ECC's website via the "projects" page, or by using this link: <https://eccenvironmental.com/projects/>

Registration as an I&AP should be submitted on or before 30 November 2024.

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

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