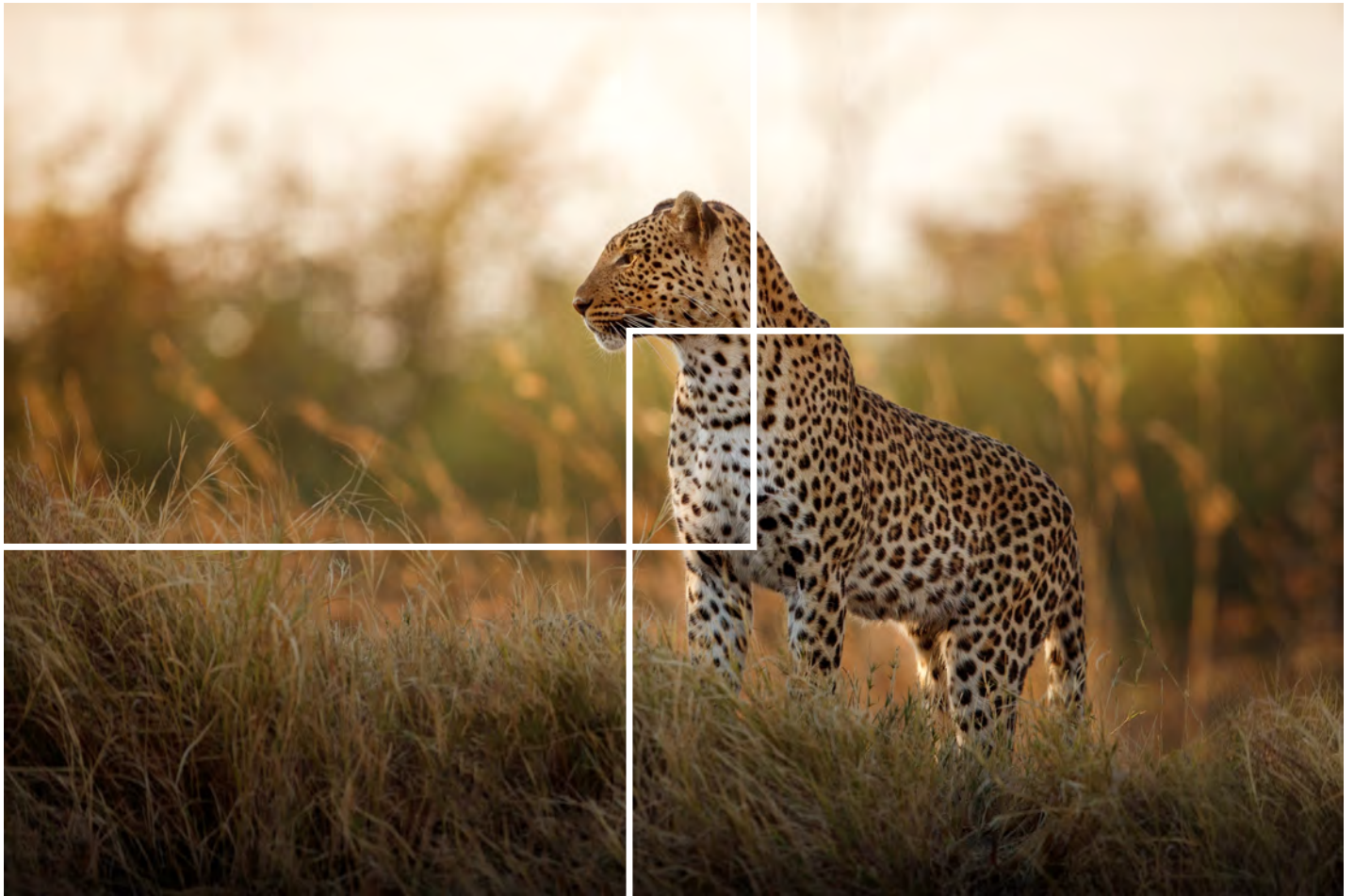




Submitted to: Burgland Zani Safaris (Proprietary)
Limited

Attention: Mr Marco Erasmus
P.O. Box 99292,
Windhoek

REPORT:

BACKGROUND INFORMATION DOCUMENT FOR THE LIANSHULU LODGE ESTABLISHMENT

PROJECT NUMBER: ECC-153-618-BID-04-D

REPORT VERSION: REV 01

DATE: 18 JUNE 2025

TITLE AND APPROVAL PAGE

Project Name: Background information document for the Lianshulu Lodge establishment

Client Company Name: Burgland Zani Safaris (Proprietary) Limited

Client Name: Mr Marco Erasmus

Client Address: P.O. Box 99292, Windhoek, 10005

Client Email: marco@naankuse.com

Client Phone Number: +264812688997

Ministry Reference: APP - 005931

Status of Report: Final for Submission

Project Number: ECC-153-618-BID-04-D

Date of issue: 18 June 2025

ENVIRONMENTAL COMPLIANCE CONSULTANCY CONTACT DETAILS:

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



Environmental Compliance Consultancy
PO Box 91193, Klein Windhoek, Namibia
Tel: +264 81 669 7608
Email: info@eccenvironmental.com

Quality Assurance

Authors:

Diaan Hoffman
Environmental Compliance Consultancy

Checked By:

Carlene Baufeldt
Environmental Compliance Consultancy

Approved By:

Jessica Bezuidenhout
Environmental Compliance Consultancy

DISCLAIMER

The 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.

TABLE OF CONTENTS

1	Background information document	6
1.1	Purpose of this document	6
1.2	Description of the Project	7
1.3	Need for the Project	9
1.4	Operational phase	9
1.5	Consideration of alternatives	10
2	The environmental and social impact assessment process	11
2.1	Stakeholder engagement.....	14
2.2	Environmental management plan	14
3	The way forward – public Pparticipation	15

LIST OF TABLES

Table 1 - Listed activities triggered by the Project	11
--	----

LIST OF FIGURES

Figure 1 – Locality map of the Lianshulu Lodge establishment	8
--	---

ABBREVIATIONS

Abbreviation	Description
BID	background information document
DEAF	Department of environmental affairs and Forestry
DWA	Department of water affairs
ECC	Environmental Compliance Consultancy (Pty) Ltd
ECC	environmental clearance certificate
ESIA	environmental and social impact assessment
EMP	environmental management plan
ha	hectares
I&APs	interested and affected parties
km	kilometre
kW	kilowatt
m	metre
m ²	square metre
m ³	cubic metre
MEFT	Ministry of Environment, Forestry and Tourism
Ltd.	limited
PPE	personnel protective equipment
Pty	proprietary
RoD	record of decision

1 BACKGROUND INFORMATION DOCUMENT

1.1 PURPOSE OF THIS DOCUMENT

Environmental Compliance Consultancy (Pty) Ltd (ECC) has been contracted by N/a'an Ku Sê Wildlife Experience (Pty) Ltd, on behalf of Burgland Zani Safaris (Pty) Ltd, (herein referred to as 'the Proponent' or Naankuse) to submit an environmental clearance certificate application and develop an environmental management plan (EMP) for the operation of the existing Lianshulu Lodge and Bush Lodge and development of Lianshulu Safari Lodge, a high-end lodge establishment in the Mudumu National Park, Zambezi Region, Namibia.

In this report, the Project is collectively referred to as the Lianshulu lodge establishment, or simply Lianshulu, to represent it as a single, interconnected lodge operation made up of multiple components.

For this Project, ECC proposes to only develop a comprehensive environmental management plan (EMP) for the following reason: Lianshulu Lodge was already constructed in 1989 and Lianshulu Bush Lodge in 1998, thus predating the promulgation of the Environmental Management Act (EMA), No. 7 of 2007. The lodge establishment will primarily be located within an combined area of approximately 12 hectares, with the infrastructure occupying only around one hectare. Small to medium lodges by nature have limited environmental footprints and low potential for significant adverse impacts on their surroundings. Thus, subjecting them to a full environmental and social impact assessment (ESIA) could be excessively resource-intensive, furthermore, this is a pre-established lodge establishment. The EMP will include all new developmental requirements for the establishment of the Lianshulu Safari Lodge and Lianshulu operations area.

Consistent with the Environmental Management Act, No. 7 of 2007 (EMA) and its associated 2012 Regulations, an environmental clearance certificate application will be submitted to the Ministry of Environment, Forestry and Tourism (MEFT) for the Project, which in terms of Section 32 (1) of the EMA has been identified as the relevant competent authority for the Project, in order to make a record of decision (RoD). The tourism-related activities trigger the listed activities as per the EMA, which are provided in section 2 of this BID as part of the screening exercise of this Project.

The purpose of this background information document (BID) is to provide MEFT and interested and affected parties (I&APs) with a background to the Project and to invite I&APs to register as part of the environmental assessment 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; and
- Next steps and the way forward.

1.2 DESCRIPTION OF THE PROJECT

The Lianshulu establishment is situated along the banks of the Kwando River, on an 800-ha private concession within the Mudumu National Park. It is located approximately 40 km from Kongola, to the west of the C49 main road, after entering Mudumu National Park in the Zambezi Region of Namibia. The lodge establishment occupies a prime location next to the Kwando River, with Botswana on the opposite side of the river, as shown in Figure 1.

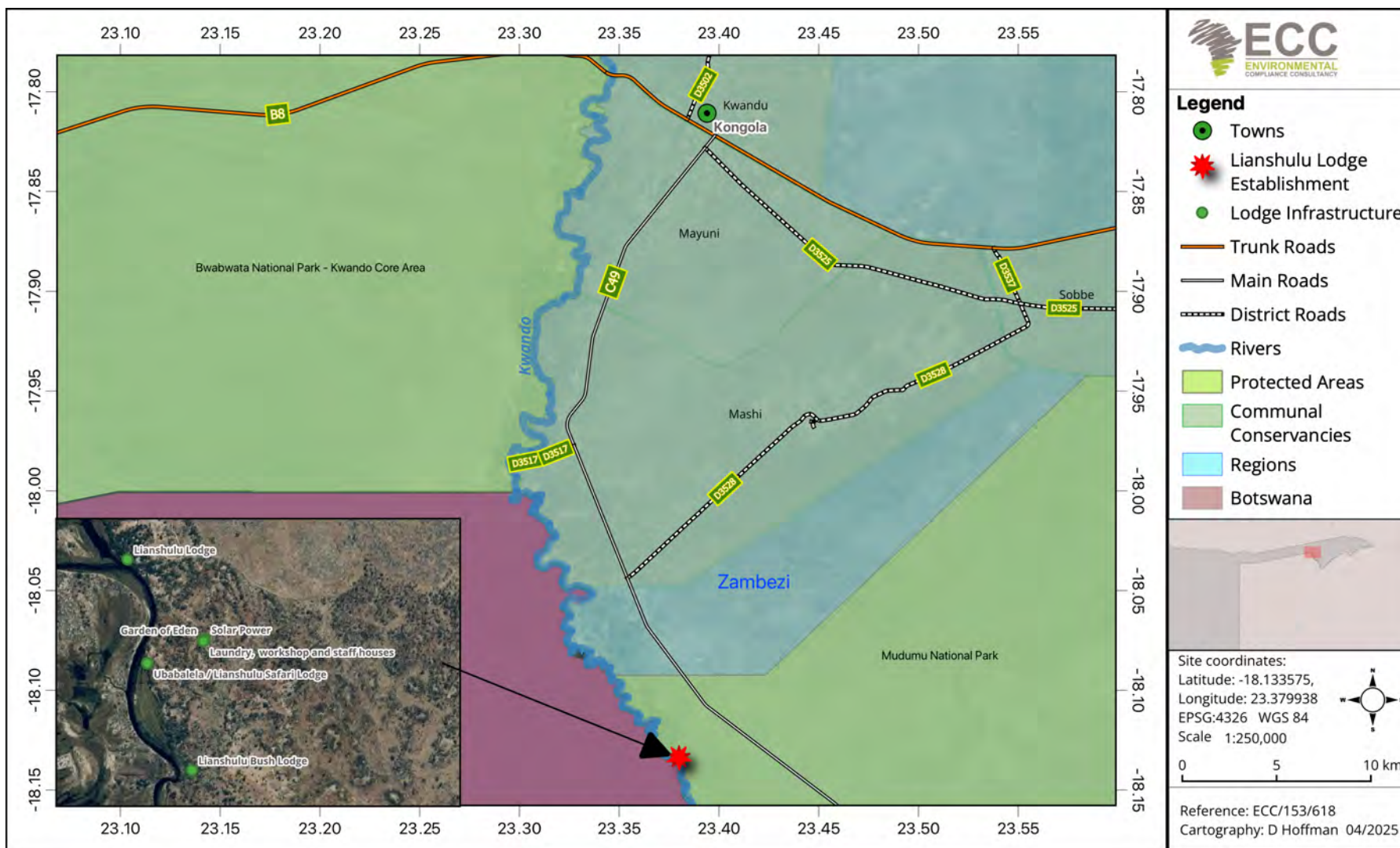


Figure 1 - Locality map of the Lianshulu Lodge establishment

1.3 NEED FOR THE PROJECT

Namibia is an international tourism destination 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.

The strategic placement of the Lianshulu Lodge establishment adjacent to the Kwando River in Namibia, in proximity to the Bwabwata National Park with its renowned Kwando core areas, falls within the Mudumu National Park, as well as near Nkasa Rupara National Park, fulfils a need for travellers and wildlife enthusiasts. This pristine location not only provides a unique experience for visitors but also serves as a crucial base for exploring the remarkable biodiversity of the region. With the lodge acting as a gateway to these ecologically significant areas, guests have the opportunity to witness the rich diversity of flora and fauna that thrive in this area.

The primary aim of the Naankuse Foundation is to aid in the conservation of Namibia's landscapes, protect the wildlife and improve the lives of the people it works with. Its envisioned impact of this Project is to help conserve the landscapes of the Babwata and Mudumu National Parks, to help protect the wildlife of the parks through supporting the anti-poaching efforts of the government and to establish social projects similar to the Lifeline Clinic and the Naankuse Primary school. Special focus will be on a research study to look at the feasibility of reintroducing rhinos into the area and if such a study supports the idea to find a way to implement such a Project.

1.4 OPERATIONAL PHASE

Lianshulu currently comprises two established lodges: Lianshulu Lodge, constructed in 1989, and Lianshulu Bush Lodge, built in 1998. Lianshulu Lodge offers eight twin en-suite guest rooms, two double rooms, and one family room, accommodating up to 24 guests, along with two guide rooms. Lianshulu Bush Lodge consists of 12 en-suite chalets and two guide rooms, with four chalets overlooking the lagoon marsh and another four situated within dense bush vegetation, each featuring private decks. Both lodges include reception areas, river-viewing decks, spacious kitchens, and supporting service facilities, with accommodation provided on a full board or dinner, bed and breakfast basis.

As part of a planned expansion, a third lodge is proposed for development between the two existing lodges along the banks of the Kwando River. This expansion, provisionally named Ubabalela Lodge or Lianshulu Safari Lodge, will comprise six luxury tented units elevated 2.5 meters above ground level on raised walkways. Additionally, the expansion will involve the establishment of Lianshulu operations, including 15 staff houses, a laundry area, a workshop, a

manager's house, a solar installation, and a "Garden of Eden", a small garden for crops, fruits and vegetables.

1.5 CONSIDERATION OF ALTERNATIVES

Best practice environmental assessment methodology calls for consideration and assessment of alternatives for a proposed Project. In a Project such as this one, it is not possible to identify an alternative site due to the lodge establishment already being constructed and in operation since 1989.

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

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

1. Screening phase (completed). The activities provided during the screening phase are provided in Table 1; and
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.

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 and Forestry (DEAF).

Table 1 - Listed activities triggered by the Project

Listed activity	ESIA screening finding
ENERGY GENERATION, TRANSMISSION AND STORAGE ACTIVITIES (1.a) The construction of facilities for the generation of electricity;	- A 250 kW solar plant will form part of the Project to produce electricity for the Lianshulu lodge establishment.
WASTE MANAGEMENT, TREATMENT, HANDLING AND DISPOSAL ACTIVITIES (2.3) The import, processing, use and recycling, temporary storage, transit or export of waste.	- This Project involves the temporary storage of general waste. The Lianshulu lodge establishment will recycle waste and general waste will be disposed of at the nearest registered landfill site.
LAND USE AND DEVELOPMENT ACTIVITIES (5.3) Construction of veterinary protected area or game proof and international boundary fences.	- There is the possibility of constructing a fence around the lodge establishment for security purposes.

Listed activity	ESIA screening finding
TOURISM DEVELOPMENT ACTIVITIES (6.) The construction of resorts, lodges, hotels or other tourism and hospitality facilities.	- Renovations of the Lianshulu lodge establishment. As part of the planned expansion, an additional lodge area is proposed between the two existing lodges along the banks of the Kwando River. This new addition, provisionally named Ubabalela Lodge or Lianshulu Safari Lodge, will feature six luxury tented units, elevated 2.5 meters above ground on raised walkways. The expansion will also involve the development of the Lianshulu operations area, which will include 15 staff houses, a laundry facility, a workshop, a manager's residence, a solar power installation and a "Garden of Eden" – a small, cultivated area for growing crops, fruits, and vegetables.
WATER RESOURCE DEVELOPMENTS (8.1) The abstraction of ground or surface water for industrial or commercial purposes.	- Water will be abstracted from a borehole for the Lianshulu lodge establishment. The daily usage of the lodge is approximately 5 m³ to 12 m³. - A water abstraction licence will be applied for from the Department of Water Affairs (DWA).
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. (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.	- French drain systems have been installed on-site at the existing establishment facilities. This will be replaced with new systems (where required). - A wastewater disposal licence will be applied for from DWA (if applicable with new systems) for the lodge establishment. - Approximately 100l of diesel will be stored on-site for generator use.

Listed activity	ESIA screening finding
OTHER ACTIVITIES (11.2) Construction of cemeteries, camping, leisure and recreation sites.	- Lianshulu will provide leisure and recreation activities, like boat cruises, game drives, nature walks/hiking and cultural activities.

2.1 STAKEHOLDER ENGAGEMENT

The neighbouring lodges 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, as per legislative requirements, will be granted for the environmental assessment practitioner (EAP) to receive any additional concerns or comments from registered I&AP's.

Comments received from I&APs throughout the process will be considered for inclusion into the final environmental management plan, that will be submitted to MEFT for a RoD.

2.2 ENVIRONMENTAL MANAGEMENT PLAN

An EMP shall be developed for the 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 document upon issuance environmental clearance certificate and approved EMP by MEFT. 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 ESIA process. It allows 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; and
- Submit the EMP to the competent authority and Environmental Commissioner for a record of decision.

The 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.

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

Environmental Compliance Consultancy (ECC)

info@eccenvironmental.com

Tel: +264 816 697 608

www.eccenvironmental.com

At ECC we make sure all information is easily accessible to the public.

Follow our social platforms online to be kept up to date.