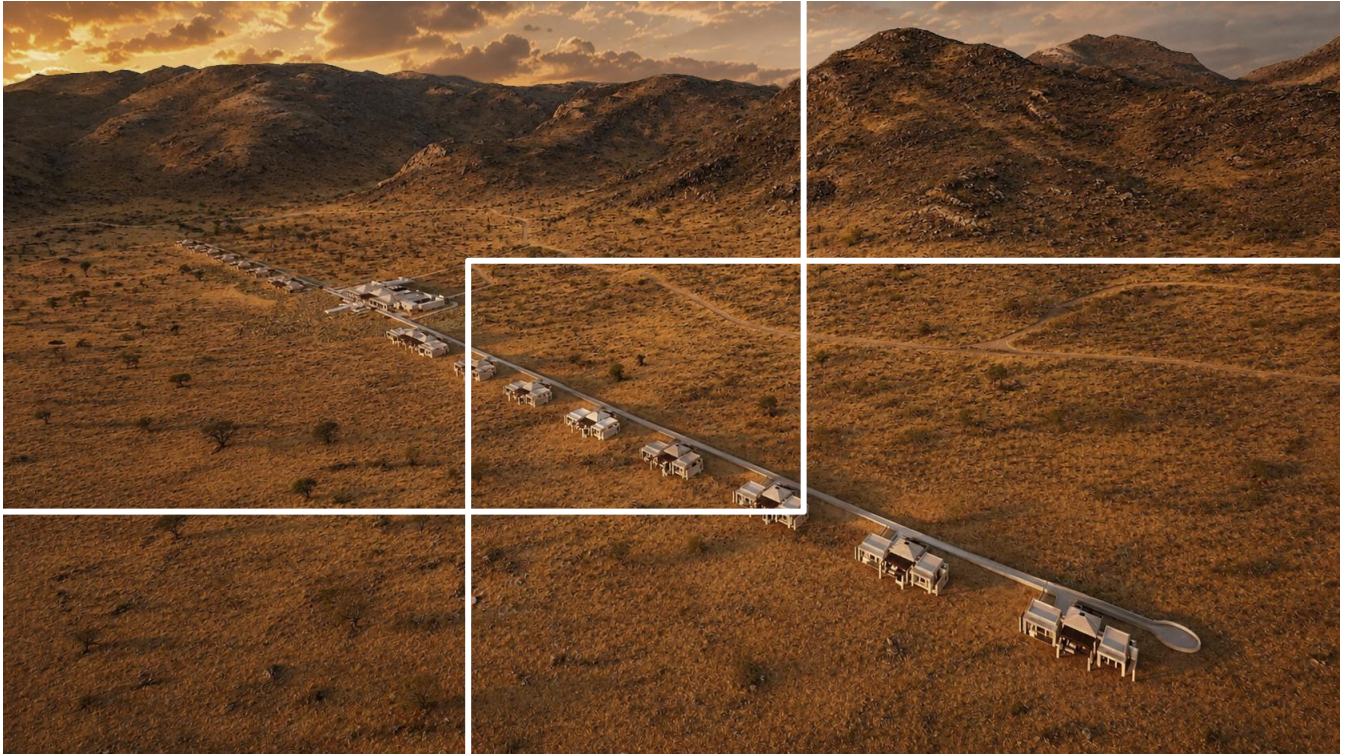




Submitted to: NeuHof Reserve (Pty) Ltd
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BACKGROUND INFORMATION DOCUMENT: PROPOSED CONSTRUCTION AND OPERATION OF THE SANCTUARY SOSSUSVLEI LODGE IN THE NAMIB DESERT, HARDAP REGION, NAMIBIA

PROJECT NUMBER: ECC-184-729-BID-02-A

REPORT VERSION: REV 02

DATE: 25 AUGUST 2026



TITLE AND APPROVAL PAGE

Project Name: Proposed construction and operation of the Sanctuary
Sossusvlei Lodge in the Namib desert, Hardap Region, Namibia

Client Company Name: Neuhof Reserve (Pty) Ltd

Client Name: Mr. Justin Matthee

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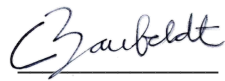
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ABBREVIATIONS

Abbreviation	Description
BID	background information document
DEA	Department of Environmental Affairs
DWA	Department of Water Affairs
ECC	Environmental Compliance Consultancy
EAP	environmental assessment practitioner
ESIA	environmental and social impact assessment
ESMP	environmental and social management plan
EMA	Environmental Management Act
GPS	global positioning system
Hardap Region	Hardap Region, Namibia
I&AP	interested and affected party
IFC	International Finance Corporation
km	kilometre
m ²	square metre
MEFT	Ministry of Environment, Forestry and Tourism
PV	photovoltaic
ToR	terms of reference
WRMA	Water Resources Management Act (No. 11 of 2013)

1 BACKGROUND INFORMATION DOCUMENT

1.1 PURPOSE OF THIS DOCUMENT

Environmental Compliance Consultancy (Pty) Ltd (ECC) has been appointed by Pula Cost Consulting (Pty) Ltd on behalf of Neuhof Reserve Pty Ltd (Project Proponent) as the independent environmental assessment practitioner (EAP) to submit an environmental clearance certificate application and undertake an environmental and social impact assessment (ESIA) process and develop an environmental and social management plan (ESMP) for the proposed construction and operation of the high end Sanctuary Sossusvlei Lodge in the Namib Desert, Hardap Region, Namibia. The Project is located within the private reserve of the Namib Tsaris Conservancy and will be operated by A&K Sanctuary Namibia, a luxury hospitality and conservation focused tourism operator.

The purpose of this background information document (BID) is to provide the competent authority and approving authority, the Ministry of Environment, Forestry and Tourism (MEFT) and interested and affected parties (I&APs) with an overview of the proposed Project and to invite I&APs to register as part of the ESIA process.

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

- The proposed Project and location;
- The necessity of the Project, benefits or adverse impacts anticipated;
- The alternatives within the Project that will be considered and assessed;
- 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 entails the construction and operation of a luxury high end Sanctuary Sossusvlei Lodge in the Namib Desert, Hardap Region, Namibia. The proposed development is a Greenfields tourism development intended to provide high-quality accommodation and tourism facilities.

The following activities are envisioned, which shall be further defined as the Sossusvlei Lodge is refined:

- Fifteen (15) luxury guest accommodation units (13 single and 2 family units);
- Wellness centre;
- Gym facilities;
- Lookout points and viewing areas;
- Staff facilities;

- Conference rooms;
- Swimming pools; and
- Associated supporting infrastructure and services.

1.3 PROJECT LOCATION

The proposed Project is located within the Namib Desert in the Sossusvlei area of the Hardap Region, Namibia (Figure 1 and Figure 2) with the private reserve of the Namib Tsaris Conservancy. The Project site is situated within a remote desert environment characterised by arid conditions, sparse vegetation and unique desert landscapes that contribute to the area's high conservation and tourism value. The proposed development footprint covers approximately 18 500 square metres (m²) and will accommodate the luxury lodge and its associated infrastructure.

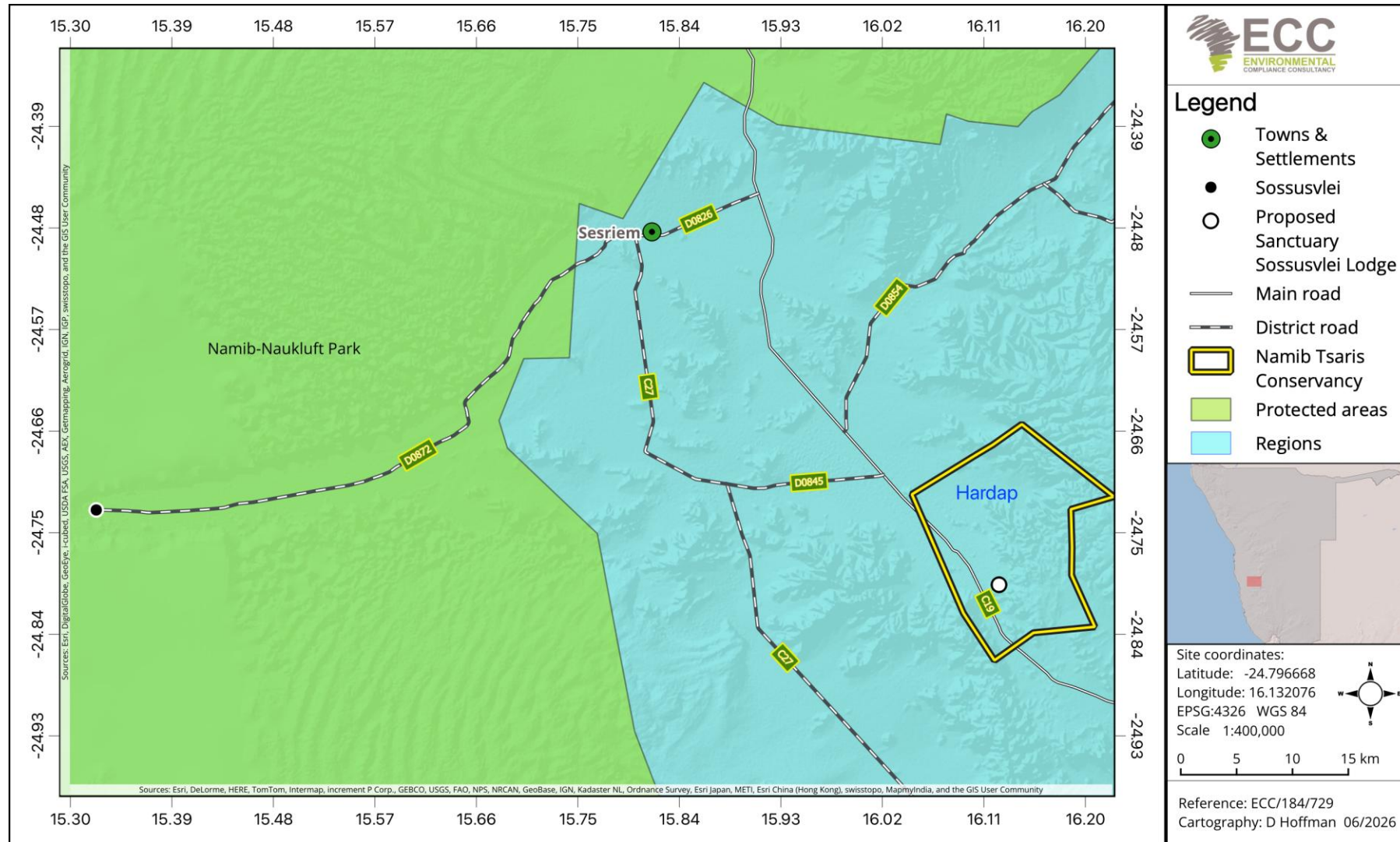


Figure 1 - Locality map of the Project site

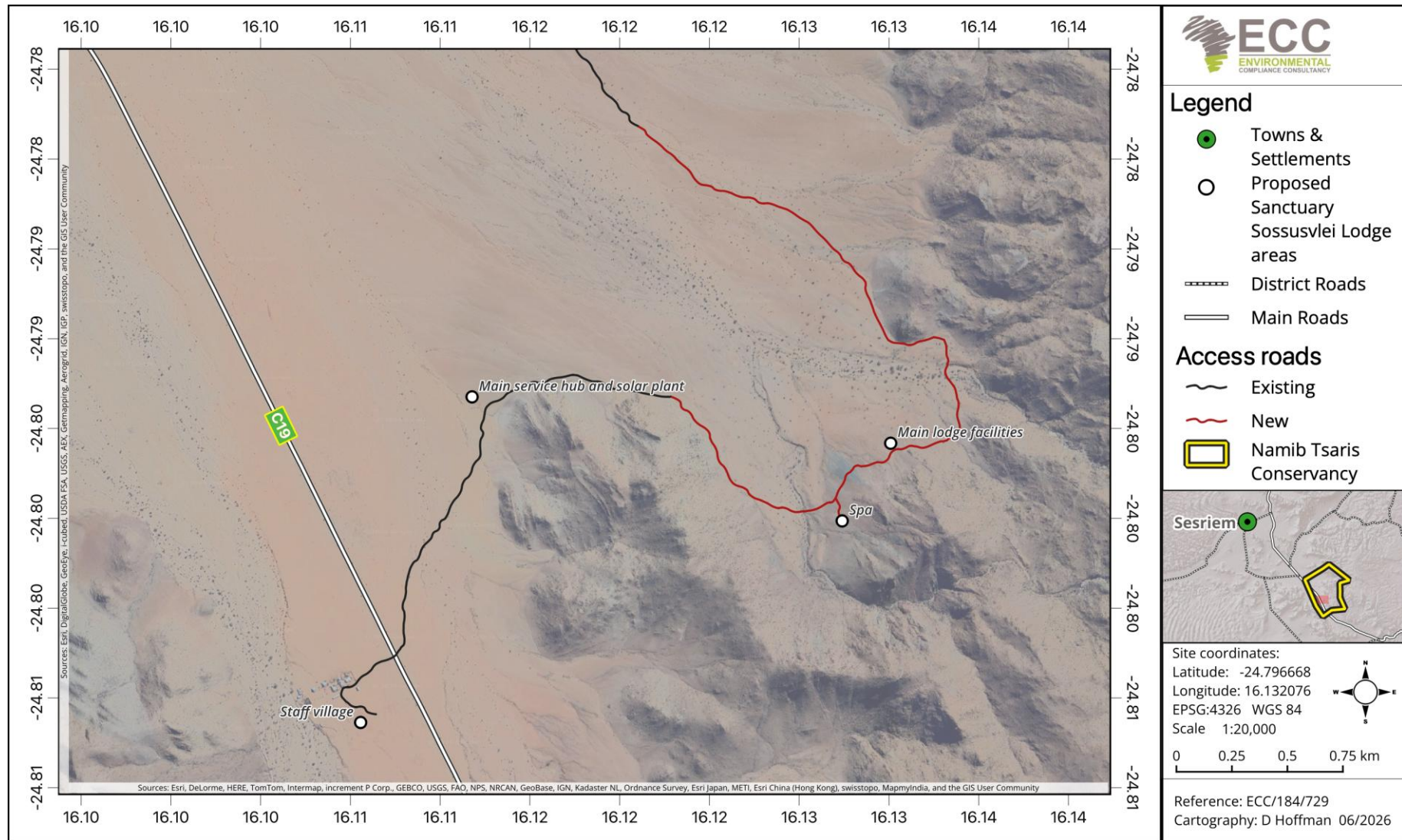


Figure 2 - Zoomed in locality map of the Project site

1.4 NEED FOR THE PROJECT

Tourism is a key driver of Namibia's economy, contributing significantly to employment, foreign exchange earnings and regional development. The proposed Greenfields luxury lodge will support the continued growth of the tourism sector in the Sossusvlei area by expanding high-quality accommodation options, creating employment opportunities, strengthening local business participation and enhancing the region's tourism infrastructure. Located within a private reserve, the development will support conservation objectives through the sustainable management of natural resources and the protection of biodiversity. The Project is also expected to contribute to both conservation and sustainable economic growth while showcasing Namibia's unique desert landscapes and tourism attractions. During the construction phase, 30 – 50 temporary jobs will be created and during the operational phase, 70 permanent jobs will be created.

1.5 CONSTRUCTION PHASE

During the development of the Sanctuary Sossusvlei Lodge various infrastructure will be constructed:

- Site preparation, earthworks and limited vegetation clearing within the development footprint;
- Construction of guest accommodation units, lodge facilities, staff accommodation and associated amenities;
- Development of access roads, parking areas, stormwater drainage infrastructure and road crossings, including the crossing of the C19 road, where required;
- Drilling and installation of boreholes, water supply, wastewater treatment and management systems, solid waste management facilities, fuel storage facilities and electrical and communication infrastructure;
- Landscaping and rehabilitation of disturbed areas, where required;
- Implementation of environmental, occupational health and safety management measures throughout construction; and
- Testing and commissioning of utility infrastructure, safety systems and emergency response procedures prior to operation.

1.6 OPERATIONAL PHASE

The following forms part of the operational phase:

- Provision of luxury accommodation services for international and local guests, as single units and family units;
- Hospitality, restaurant and catering services;
- Guided tourism and nature-based recreational activities;
- Spa, wellness and leisure services;
- Conference facilities;
- Operation and maintenance of lodge facilities and supporting infrastructure; and

-
- Employment of operational and hospitality personnel.

1.6.1 SUPPORT INFRASTRUCTURE AND SERVICES

- Staff accommodation and support facilities;
- Spa, gym and lookout facilities;
- Swimming pools;
- Airconditioning facilities;
- Solar photovoltaic (PV), electrical infrastructure and backup power generation systems;
- Borehole water supply and storage infrastructure;
- Wastewater treatment and disposal infrastructure (modular system with French drain system);
- Internal access roads and parking areas; and
- Communication infrastructure, including telephone, radio and internet services.

1.6.2 WASTE MANAGEMENT

Waste generated during the construction and operational phase will be managed in accordance with good environmental practice and the Project environmental and social management plan (ESMP). Waste will be separated at source, stored in designated waste receptacles, and recycled or reused where feasible. A dedicated waste storage area will be established for the temporary storage of waste prior to collection and disposal at approved offsite recycling or waste disposal facilities.

Hazardous and hydrocarbon waste, including waste oils, fuels, chemicals, cleaning agents, batteries, paints and contaminated materials, will be stored in appropriately labelled, sealed containers within designated containment areas and removed by licensed waste management contractors for treatment or disposal at approved off-site facilities.

1.7 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, it is difficult to identify alternatives to satisfy the needs of the proposed Project, different lodging facilities currently exist on the reserve in specific locations.

During the design phase, alternatives considered included the following:

- Routing of internal linear infrastructure;
- Staff accommodation;
- Placement of central support services;
- Technology for power supply;
- Technology for wastewater treatment systems;
- Floor plan sizing of single and family units;
- Roofing structural options; and

- Utilisation of shared infrastructure with existing services on the reserve.

A thorough assessment for alternative land uses for the site will be conducted, particularly in consultation and collaboration with selected stakeholders.

The assessment of alternatives seeks to identify the most environmentally and socially acceptable option while meeting the objectives of the proposed development. Where required, specialist investigations, including biodiversity, groundwater and geotechnical assessments, will be undertaken to inform decision-making and minimise potential environmental impacts during the assessment phase of the Project.

2 THE ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT PROCESS

The environmental clearance certificate application process and ESIA for the proposed Project is being conducted by ECC and will be undertaken in terms of the Environmental Management Act, 2007 and its 2012 Regulations. The process followed for this ESIA is set out in the flowchart in Figure 3. Note the ToR issued by MEFT following Project registration will determine if the Project requires a scoping with impact assessment process (one report) or an environmental and social impact assessment process (two reports). At this stage, the full ESIA process is described below.

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) as the identified competent authority and approving authority on the record of decision (RoD).

The related environmental process will include:

1. Screening phase (completed);
2. Scoping phase and scoping report, which includes baseline studies, the development of the terms of reference (ToR) based on MEFT requirements and development of the draft environmental and social management plan (not initiated – next phase); and
3. Assessment phase, which includes impact prediction and evaluation of alternatives, assigning mitigation measures and developing monitoring and conceptual rehabilitation plans. This phase culminates in the drafting of the ESIA report and finalisation of the environmental and social management plan (ESMP) and submission to the appropriate competent authorities for a RoD (not initiated – dependent on MEFT ToR).
4. Stakeholder engagement is conducted throughout all phases of the Project.



PUBLIC PARTICIPATION

Figure 3 - Flowchart of the environmental and social assessment process

2.1 SCREENING

A review of the planned Project was undertaken and the screening findings against the listed activities was conducted; the findings of which are summarised in Table 1.

Table 1- Listed activities triggered by the proposed Project

LISTED ACTIVITY	SCREENING FINDING
ENERGY GENERATION, TRANSMISSION AND STORAGE ACTIVITIES 1. The construction of facilities for: (a) The generation of electricity; and (b) The transmission and supply of electricity.	- Diesel generators and solar power systems may be utilised during both the construction and operational phases to provide backup and supplementary electricity supply to the lodge and associated infrastructure.
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.	- The proposed Project involves the construction and operation of the Sanctuary Sossusvlei Lodge and associated infrastructure, which will generate general domestic waste, recyclable waste and hazardous and hydrocarbon waste streams during both the construction and operational phases. - Ablution facilities will be constructed as part of the lodge infrastructure and wastewater generated during operation will be managed through an on-site wastewater treatment system. - Waste bins and designated waste storage areas will be provided to ensure the proper collection, separation and management of general waste, including food waste, packaging materials and housekeeping waste. - A wastewater treatment. reuse and discharge licence, issued in terms of the Water Resources Management Act, No. 11 of 2013 (WRMA) by Department of Water Affairs (DWA) will be required for the wastewater treatment facility.

LISTED ACTIVITY	SCREENING FINDING
FORESTRY ACTIVITIES (4.) The clearance of forest areas, deforestation, afforestation, timber harvesting or any other related activity that requires authorisation in term of the Forest Act, 2001 (Act No. 12 of 2001) or any other law	- Limited vegetation clearing will be required within the development footprint to accommodate lodge infrastructure, internal access roads, parking areas and associated services. - Disturbed areas will be rehabilitated following construction, and necessary permits will be obtained where protected or controlled plant species are affected.
TOURISM DEVELOPMENT ACTIVITIES (6.) The construction of resorts, lodges, hotels or other tourism and hospitality facilities.	- The lodge comprising of thirteen (13) single units and two (2) family units will be constructed along with the following supporting infrastructure: swimming pools, restaurant, conference rooms, gym, reception block, spa and staff village.
WATER RESOURCE DEVELOPMENTS (8.1) The abstraction of ground or surface water for industrial or commercial purposes.	- Water will be abstracted from onsite borehole(s) to support construction activities and lodge operations including, domestic use and housekeeping. - A borehole abstraction and water use licence issued by DWA in terms of WRMA will be required. - If new boreholes are to be drilled, these boreholes will need to be registered before drilling is to take place. This requires the submission of an application for a borehole drilling licence.
HAZARDOUS SUBSTANCE TREATMENT, HANDLING AND STORAGE	- Fuels, oils, cleaning chemicals and other hazardous and hydrocarbon substances will be stored and used during both the construction and operational phases.

LISTED ACTIVITY	SCREENING FINDING
(9.1) The manufacturing, storage, handling or processing of a hazardous substance defined in the Hazardous Substances Ordinance, 1974	– Diesel for the backup diesel generator – (approximately 5000 litres (L) will be stored on site in double walled, self-bunded diesel storage tanks. In terms of the Petroleum Act, No. 13 of 1990 and its Regulations of 2000, a consumer installation certificate will be required for the bulk fuel storage (> 600 L above ground), handling and dispensing of fuel in a rural area.
OTHER ACTIVITIES (11.2) Construction of cemeteries, camping, leisure and recreation sites.	– A lodge will be constructed, comprising of thirteen (13) single units and two (2) family units.

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 literature are identified forming the starting point for assessment of the required baseline and specialist studies that may be required for assessment of the Project impacts.

2.3 ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT PHASE

2.3.1 POTENTIAL IMPACTS

The proposed construction and operation of the Sanctuary Sossusvlei lodge may result in a range of social, economic, heritage, biophysical and biodiversity impacts, considering the scale of the development, its location within a private reserve and conservancy, and its interaction with existing activities and the surrounding environment.

The anticipated environmental and social impacts associated with the construction and operation of the Project may include the following:

Socio-economic and social impacts

- Potential employment creation and local economic development opportunities;
- Potential impacts on existing reserve operations, guests, staff and residents;
- Potential disturbance to the sense of place, wilderness character and tourism experience;
- Potential impacts on road users and traffic safety along the C19 road;
- Potential pressure on water, power and other supporting services;

-
- Potential community expectations regarding employment, procurement and project benefits;
 - Potential disturbance of archaeological, cultural heritage or palaeontological resources; and
 - Potential cumulative impacts associated with increased tourism activities, infrastructure development, road use, water demand and waste generation within the reserve and conservancy.

Biophysical and biodiversity impacts

- Potential noise, dust and air quality impacts during construction and operation;
- Potential visual impacts from lodge infrastructure, access roads and associated services;
- Potential soil disturbance, erosion and contamination from construction activities, fuel storage, waste and hazardous substances;
- Potential impacts on groundwater and surface water quality and availability due to water abstraction, wastewater generation, stormwater runoff, spills or leaks;
- Potential alteration of natural drainage patterns and stormwater flows;
- Potential impacts associated with waste generation, storage, handling and disposal;
- Potential disturbance or loss of vegetation and sensitive desert habitats;
- Potential impacts on fauna movement, behaviour and habitat use;
- Potential impacts on protected, endemic or sensitive plant and animal species; and
- Potential introduction or spread of invasive alien species.

2.3.2 DRAFT ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN

An ESMP shall be developed for the proposed 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, reserve and community. The commitments in the ESMP becomes the legally binding upon approval of the ESMP 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 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 construction and operation of Sanctuary Sossusvlei Lodge project (this document).
 - o Advertise the environmental application and call for registration of I&APs in two national newspapers for two consecutive weeks.
 - o If required by MEFT in the ToR, conduct public with the public and/or focus group meetings with identified stakeholders.
 - o Open a 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 and/or ESIA report that shall submit with the application.
- Prepare a scoping report and/or ESIA report and provide same to registered I&APs for comment.
- Submit the scoping report and/or ESIA 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 ECCs website on the projects page, or by using this link: <https://eccenvironmental.com/download/proposed-construction-and-operation-of-the-sanctuary-sossusvlei-lodge-in-the-namib-desert-hardap-region-namibia/>

Registration as an I&AP should be submitted on or before 01 July 2026.

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

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