

**ENVIRONMENTAL IMPACT SCOPING ASSESSMENT AND ENVIRONMENTAL MANAGEMENT
PLAN FOR THE PROPOSED KRONE ELEPHANT LODGE, TWYFELFONTEIN AREA, KUNENE
REGION
BACKGROUND INFORMATION DOCUMENT**



Prepared by:



Prepared for:

Krone Elephant Lodge CC

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1 INTRODUCTION

Geo Pollution Technologies (Pty) Ltd (GPT) was appointed by Krone Elephant Lodge CC to undertake an environmental assessment for the proposed Krone Elephant Lodge in the Twyfelfontein area, Kunene Region, Namibia (Figure 1-1). The proposed development will entail the establishment and operation of a tourism lodge and associated support infrastructure within a defined leasehold area. The proposed development is supported by the relevant Traditional Authority, with lease renewal currently in process. The assessment will include activities related to the construction and operation of the proposed lodge and associated services.

An environmental clearance certificate (ECC) for the construction and operation of the proposed lodge is required as per the Environmental Management Act No. 7 of 2007 (EMA). A scoping environmental assessment report and an environmental management plan (EMP) are proposed to be submitted to the Ministry of Environment, Forestry and Tourism's Department of Environmental Affairs (DEA) in support of an application for an ECC. The environmental assessment will include all construction and operational activities associated with the lodge development and associated activities of the Proponent.

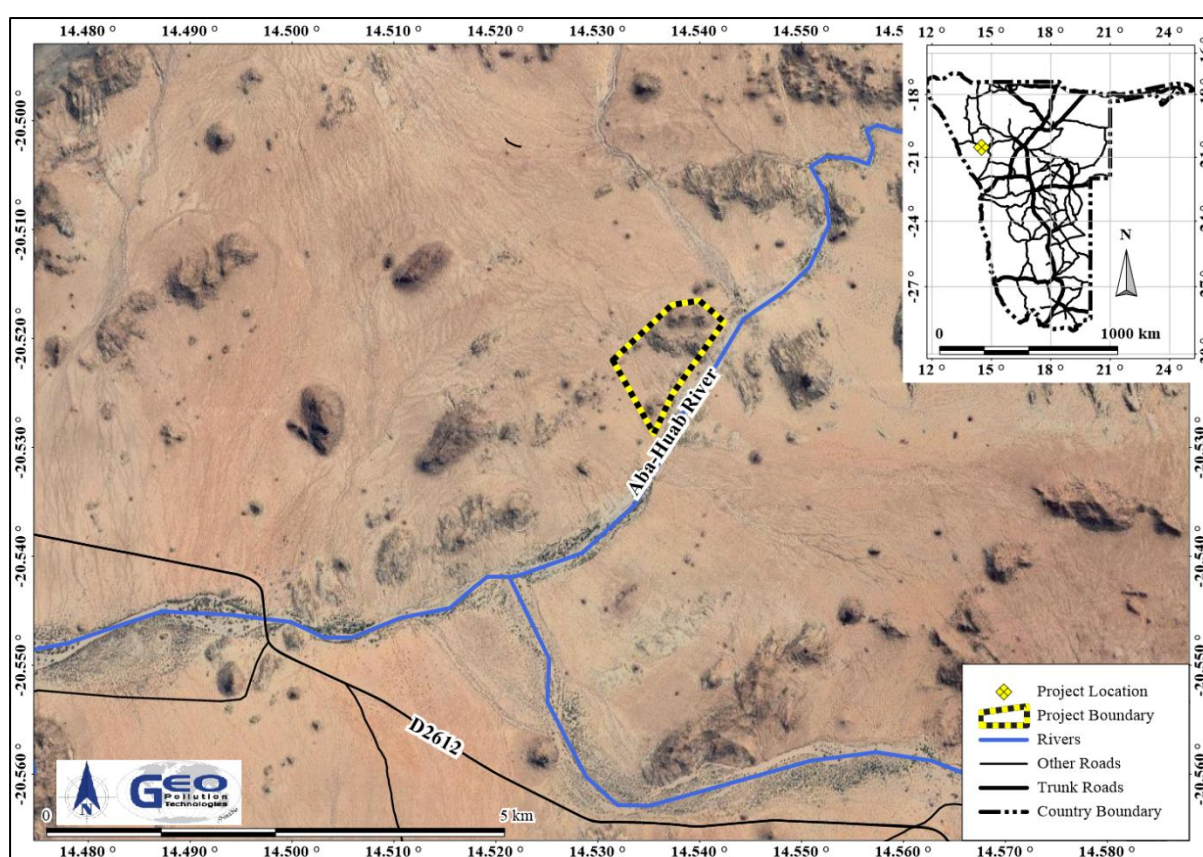


Figure 1-1 Project location

2 PURPOSE OF THE BID

With this background information document (BID), GPT aims to provide interested and affected parties (IAPs) with information about the project and interact with them regarding it. All IAPs are therefore invited to register with GPT for the project.

3 PROJECT DESCRIPTION

Activities associated with the project have been divided into the following phases: planning, maintenance/construction, operational and the decommissioning phase. A brief outline of expected activities for each phase is detailed below.

3.1 PLANNING PHASE

While planning for construction / maintenance, operations and decommissioning of the lodge and associated infrastructure, it is the responsibility of the Proponent to ensure compliance with all legal requirements. The Proponent must also ensure that all required management measures are in place prior to and during all phases, to ensure potential impacts and risks are minimised. Typical planning activities include:

- ◆ Obtain permits and approvals from local and national authorities including Ministry of Environment, Forestry and Tourism and the local traditional authority.
- ◆ Ensure continued compliance with land use rights and completion of the lease renewal process with the relevant Traditional Authority.
- ◆ Appoint a health, safety and environmental coordinator to implement the EMP and prepare and update various emergency response plans, waste management plans, etc.
- ◆ Provide for a fund to cater for environmental incidents such as pollution clean-up and ecological restoration if ever required.
- ◆ Ensure all appointed contractors and employees enters into an agreement which includes the EMP.
- ◆ Establish and / or maintain a reporting system to report on aspects of construction and maintenance, operations and decommissioning as outlined in the EMP and as required by the DEA.

3.2 CONSTRUCTION AND MAINTENANCE PHASE

Construction activities will include the establishment of the proposed lodge and associated infrastructure within the project area. This may include site preparation, limited clearing of vegetation where required, the setting out of internal access areas and roads, and the construction and installation of the required lodge infrastructure and services. The proposed development will include a mix of tented accommodation units and campsites, with the initial development envisaged in the range of 30 to 40 overnight units, approximately 10 campsites, a restaurant facility in the range of 60 to 70 seats, and associated staff, management, water supply and service infrastructure. Tent

bases will be constructed of brick and concrete. Primary initial electricity supply is proposed by means of a solar-powered 3-phase 30 KVA system, with backup power provided by a 40 KVA generator. Water will be supplied from a registered borehole. Maximum water consumption is estimated at approximately 22,000 litres per day. Wastewater infrastructure will comprise septic holding tanks with a soakaway trench system.

3.3 OPERATIONAL PHASE

Once construction and setup are complete, the lodge will be operated by the Proponent. Operational activities will include the provision of accommodation, camping, ablution, restaurant and general guest services, as well as the operation and maintenance of the associated support infrastructure. The proposed lodge will provide a combination of tented accommodation and campsites, supported by communal and en-suite ablution facilities where applicable. Water will be supplied from a registered borehole. Water and wastewater services will be managed through the on-site water storage and wastewater disposal infrastructure. Electricity will be supplied from the proposed solar power system. General waste generated during operations will be managed on site and removed for appropriate disposal, with recycling will be applied where feasible.

3.4 DECOMMISSIONING PHASE

Decommissioning is not foreseen during the validity of the ECC. Decommissioning will however be assessed. Should decommissioning occur at any stage, rehabilitation of the area may be required. Decommissioning will entail the complete removal of all infrastructure including buildings and underground infrastructure not required for future land use. Pollution present on the site, if any, must be remediated as part of the decommissioning process.

3.5 PRELIMINARY IDENTIFIED IMPACTS

During the environmental assessment, all components of the environment will be considered, however only those components which are being impacted on significantly, or are deemed to be sensitive, will be assessed. These include the following:

- ◆ Health and safety risks
- ◆ Soil and groundwater pollution
- ◆ Over abstraction of groundwater
- ◆ Fire risks
- ◆ Waste and effluent generation and disposal
- ◆ Traffic
- ◆ Noise
- ◆ Visual
- ◆ Ecosystem and biodiversity
- ◆ Socio-economic contributions

4 PUBLIC CONSULTATION

GPT invites all IAPs to provide in writing, any issues and suggestions regarding the development. This correspondence must include:

- ◆ Name and surname,
- ◆ Organisation represented or private interest,
- ◆ Position in the organisation,
- ◆ Contact details, and
- ◆ Any direct business, financial, personal or other interest which you may have in the approval or refusal of the application.

All contributions become public knowledge and will be circulated along with the reports as per the EMA requirements. The comments, inputs and suggestions will also be submitted to the DEA along with how any issues have been addressed in the reports. The public participation process will remain ongoing during the environmental assessment.

The project team may be contacted on the contact details below



Your Rights as an IAP according to the Environmental Management Act, No7 of 2007, Government Notice No 30 (Environmental Impact Assessment Regulations)

Section 23. (1) A registered interested or affected party is entitled to comment in writing, on all written submissions made to the Environmental Commissioner by the applicant responsible for the application, and to bring to the attention of the Environmental Commissioner any issues which that party, believes may be of significance to the consideration of the application, as long as -

- (a) comments are submitted within 7 days of notification of an application or receiving access to a scoping report or an assessment report;*
 - (b) the interested and affected party discloses any direct business, financial, personal or other interest which that party may have in the approval or refusal of the application.*
- (2) Before the applicant submits a report compiled in terms of these regulations to the Environmental Commissioner, the applicant must give registered interested and affected parties access to, and an opportunity to comment in writing on the report.*
- (3) Reports referred to in sub regulation (2) include (a) scoping reports; (b) scoping reports amended and resubmitted; (c) assessment reports; and (d) assessment reports amended and resubmitted.*
- (4) Any written comments received by the applicant from a registered interested or affected party must accompany the report when the report is submitted to the Environmental Commissioner.*
- (5) A registered interested or affected party may comment on any final report that is submitted by a specialist reviewer for the purposes of these regulations where the report contains substantive information which has not previously been made available to a registered interested or affected party.*

Section 24: The applicant responsible for an application must ensure that the comments of interested and affected parties are recorded in reports submitted to the Environmental Commissioner in terms of these regulations, and comments by interested and affected parties on a report which is to be submitted to the Environmental Commissioner may be attached to the report without recording those comments in the report itself.