



# **Environmental Audit Report for the Renewal of Mining License (ML) No. 91 on Mansfield Farm 66 near Usakos in the Karibib District, Erongo Region.**

**ECC Number:**

**EDS Project Number: PNEA2018-03**

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## 1 INTRODUCTION

### 1.1 Project Background

This bi-annual audit report is prepared on behalf of Manger Mining (Pty) Ltd (hereinafter referred to as *The Proponent*), who has been extracting tourmaline specimens on mining license 91 (ML 91) near Usakos in the Erongo Region. The report provides a summary of the environmental performance since the granting of the Environmental Clearance Certificate on 22 March 2019 and the last environmental audit on August 2020. Manger Mining and its contractors have proceeded with the extraction activities. The location of the Mining License 91 (ML 91) is shown in **Figure 1**.

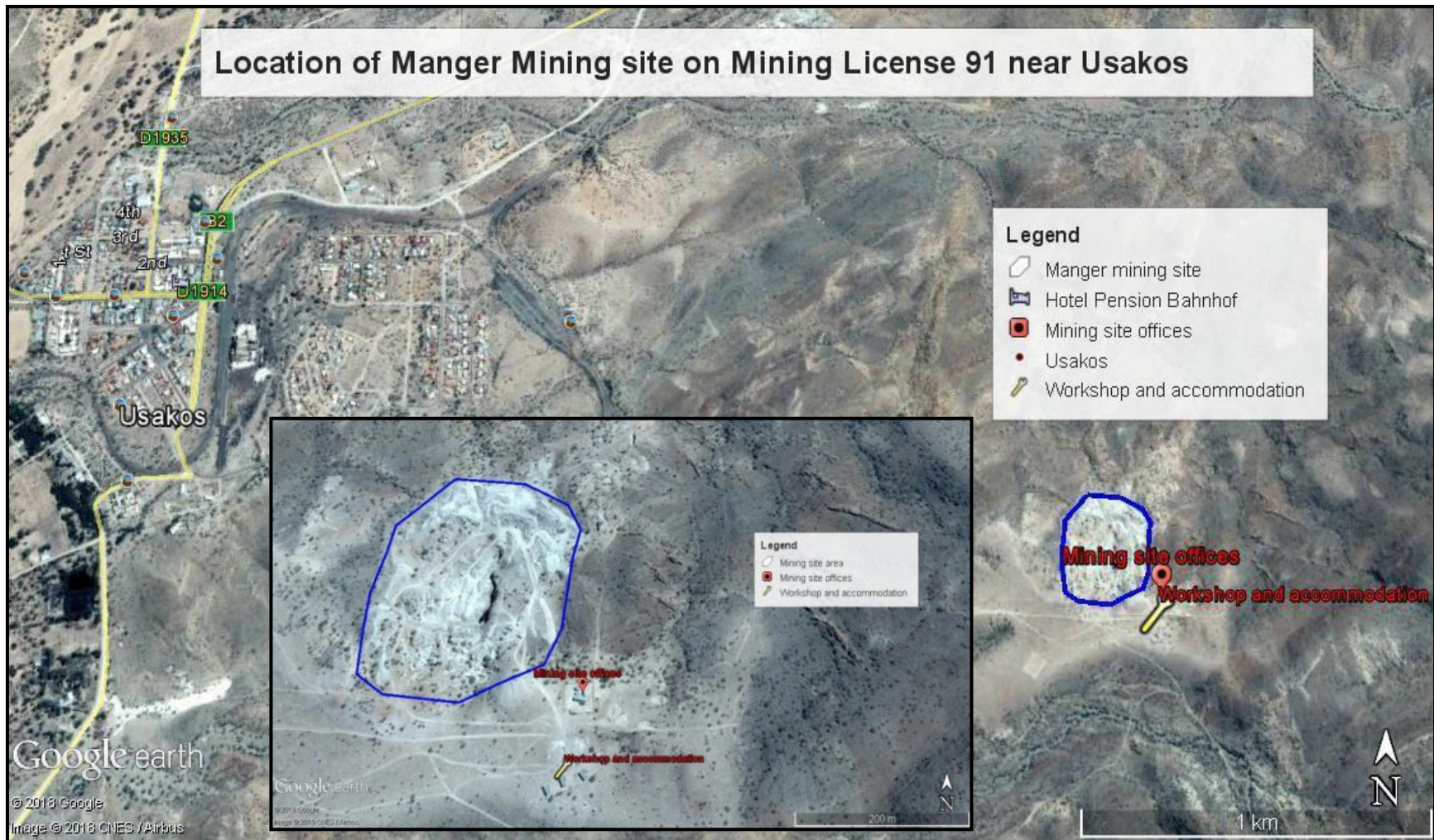


Figure 1:      Location of the mining license 91 near Usakos, Karibib District, Erongo Region

## 1.2 Purpose of the Environmental Compliance (Audit) Report

An Environmental Audit Report provides the link between the impacts identified in the EIA Process and the required environmental management on the ground during project implementation and operation, as assessed during compliance monitoring.

The compilation of this Environmental Audit Report was one of the requirements (scope of work) presented to Excel Dynamic Solutions (Pty) Ltd by The Proponent, to ensure environmental compliance with reference to the Environmental Management Plan (EMP), which has been prepared as a legal requirement by Section 8 of the Environmental Management Act (EMA), No. 7 of 2007 and its 2012 Environmental Impact Assessment (EIA) regulations.

This Environmental Audit Report serves to document the progress made on the mining works of ML 91. The phases of the renewal of the extraction of tourmaline activities are summarized below:

- **Operation and maintenance** – This is the phase during which the operation of Manger Mining (Pty) Ltd is extracting tourmaline specimens from the mining pit and undertaking related activities on site. It is also the phase during which maintenance of the mining pit, equipment and machinery is done by Manger Mining themselves.
- **Environmental Monitoring Requirements** - In order to support and ensure that the proposed mitigation measures are achieving the desired results, a monitoring plan was implemented alongside the mitigation plan.
- **Decommissioning and Rehabilitation** – This is the phase during which the mining of the target commodity cease. The decommissioning of the mining operations may be considered due to declining in the tourmaline specimens (below profitable specimens) and/or low demand for the mined tourmaline (falling of commodity prices on the market). During the operational phase and before decommissioning, the Proponent will need to put site rehabilitation measures in place.

It is expected from Manger Mining and its employees and/or contractors in guiding them during the mining operations to ensure that impacts on the environment, are avoided or limited if they cannot be avoided completely.

### 1.3 Appointed Environmental Assessment Practitioner

Manger Mining has appointed Excel Dynamic Solutions (Pty) Ltd, an independent team of Environmental Consultants to conduct the required Environmental Assessment process and prepare a detailed Environmental Management Plan that can be used as guide to monitor compliance to the recommendations made in the EIA; and thereafter, submit the Environmental Clearance Certificate (ECC) application to the Ministry of Environment, Forestry and Tourism and Ministry of Mines and Energy on their behalf.

Excel Dynamic Solutions (Pty) Ltd has been appointed as the external Environmental Control Officer (ECO) to ensure EMP compliance throughout the project life cycle, with the conditions of authorization, in performing environmental monitoring and auditing, in order to produce the subsequent bi-annual environmental compliance reports.

This document was compiled by Ms. Rose Mtuleni, and reviewed by Mr. Nerson Tjelos.

### 1.4 Environmental Auditing

The current baseline is expected to be reviewed and progress inspected according to the EMP that had been provided as part of the application for the Mining License 91, rendering bi-annual compliance reports a requisite part of environmental monitoring. In addition to the compliance audit and review provided in this report, the EMP is to be revised, and any monitoring gaps realized, identified; additional best practice measures that were absent from the previous EMP will be implemented. Site inspection is done as part of this submission.

### 1.5 Details of the Project Proponent

The details of the Proponent are presented in **Table 1** below.

**Table 1: Proponent contact details and purpose of the ECC**

Full name of Proponent	Physical Address & Contact number	Postal Address	ECC Application for:
Manger Mining (Pty) Ltd	Mansfield Farm 66, Usakos, Karibib District Tell: +264 (0) 61 223 396/081 128 3234	P. O. Box 3013, Windhoek, Namibia	Renewal of Mining License (ML) 91 and Associated Activities on Mansfield Farm 66 near Usakos, Karibib District in the Erongo Region

## 2 EMP ROLES AND RESPONSIBILITIES

As the ML holder, Manger Mining is ultimately responsible for the implementation of the EMP, and has delegated the responsibility for the effective implementation of the EMP to Excel Dynamic Solutions (Pty) Ltd.

### 2.1 Environmental Management Plan Actions and Audit

The aim of the management actions of the EMP is to avoid potential negative impacts where possible. Where impacts cannot be avoided, measures are provided to reduce the significance of these impacts. It is therefore important for the Proponent/Environmental Manager to be sure to adhere to the management actions.

Management actions recommended for the potential impacts rated in the EA carried out for the mining activities were based on the three project phases listed below:

- Phase 1: Operation and Maintenance (**Table 3**)
- Phase 2: Monitoring (**Table 4**)
- Phase 3: Decommissioning and Rehabilitation

The responsible persons at Manger Mining (Pty) Ltd should assess these commitments in detail and should acknowledge their commitment to the specific management actions detailed in the phases given under the following subsections. The compliance levels thereof, are measured in **Tables 3** and **4**.

### 2.2 Key Potential Environmental Impacts to be managed

From the EIA conducted, the following key potential negative impacts have been identified per project phase and are summarized in **Table 2** below.

**Table 2: Summary of key potential environmental impacts per project phase**

	Potential negative impacts identified in the EA
1	Health and safety, visual, waste, noise
2	Access to site
3	Visual impacts on landscape, Sufficiency of rehabilitation measures,



### 2.3 Phase 1: Operation (and Maintenance) Phase Management Action Plans

The management action plans recommended for this phase are presented in **Table 3** below.

**Table 3: Management action plans for the Operation and Maintenance Phase and EMP Audit**

Environmental Feature	Management Actions	Observations	Compliance comment	Corrective Action/Recommendation
EMP training	<ul style="list-style-type: none"> <li>Employees appointed for operation and maintenance on respective site must ensure that all personnel are aware of necessary health, safety and environmental considerations applicable to their respective works.</li> </ul>	This mining project has 4 staff members – all have been made aware.	<b>COMPLIANT</b>	N/A
Monitoring	<ul style="list-style-type: none"> <li>The ECO or the Proponent should monitor the implementation of this EMP.</li> </ul>	Undertaken on a weekly bases.	<b>COMPLIANT</b>	N/A
	<ul style="list-style-type: none"> <li>An EMP non-compliance penalty system should be implemented on site.</li> </ul>	No general non-compliance penalty system in place for the mining project. The crew size is also small, manageable and adherent to the safety, health and environment regulations thus far.	<b>PARTIALLY-COMPLIANT</b>	Implement a non-compliance penalty system based on the environmental features identified in the EMP, in order to ensure effectiveness of EMP mitigation measures for mining works.



Environmental Feature	Management Actions	Observations	Compliance comment	Corrective Action/Recommendation
Visual Impacts (sense of place)	<ul style="list-style-type: none"> <li>All the necessary options to improve the aesthetic of the site should be considered and incorporated in the mining activities and plans.</li> </ul>	The site is kept tidy and shows consideration of the natural aesthetic of the site, particularly preservation of surrounding vegetation.	<b>COMPLIANT</b>	N/A
Biodiversity	<ul style="list-style-type: none"> <li>Vegetation found on the site, but not in the targeted mining areas should not be removed, but left to preserve biodiversity on the site.</li> </ul>	No vegetation has been removed from site.	<b>COMPLIANT</b>	N/A
	<ul style="list-style-type: none"> <li>Shrubs, trees or shrubs found along new mining spots on sites should not be unnecessarily removed. Care should be taken so that mining activity occurs without destroying the vegetation.</li> </ul>	All staff are made aware	<b>COMPLIANT</b>	N/A
	<ul style="list-style-type: none"> <li>Workers should refrain from killing or snaring animals' species (big or small) that may be found on the site.</li> </ul>	All staff are made aware	<b>COMPLIANT</b>	N/A

Environmental Feature	Management Actions	Observations	Compliance comment	Corrective Action/Recommendation
	<ul style="list-style-type: none"> <li>Environmental awareness on the importance of biodiversity preservation should be provided to the workers</li> </ul>	Not separately implemented, but addressed through the two measures above, on protection of animals and vegetation.	<b>COMPLIANT</b>	N/A
Employment	<ul style="list-style-type: none"> <li>Preference for casual works during operational phase should be given to Karibib's locals.</li> </ul>	No casual workers employed.	<b>COMPLIANT</b>	N/A
	<ul style="list-style-type: none"> <li>No recruitment should be done on site.</li> </ul>	All vacancies are sourced locally face to face. There is no recruitment on site as members of the public are not allowed anywhere near the mining area.	<b>COMPLIANT</b>	N/A
Air Quality	<ul style="list-style-type: none"> <li>Mining schedule should be limited to the hours between 08h00 and 17h00. This will keep the vehicle-related dust level minimal in the area.</li> </ul>	The work hours are adhered to.	<b>COMPLIANT</b>	N/A

Environmental Feature	Management Actions	Observations	Compliance comment	Corrective Action/Recommendation
	<ul style="list-style-type: none"> <li>Since the project site is in an area where, due to little vegetation cover, soils are exposed, it is highly probable that more dust will be generated from mining (excavating). It is therefore advisable that in extremely windy days, a reasonable amount of water should be used to suppress the dust that may be emanating from certain mining areas on the site.</li> </ul>	Water is kept on site for this purpose.	<b>COMPLIANT</b>	N/A
Waste Generation	<ul style="list-style-type: none"> <li>Workers should be sensitised to dispose of waste in a responsible manner and not to litter.</li> </ul>	Waste is collected and then removed from the site once a week, taken to the Usakos dump site.	<b>COMPLIANT</b>	N/A
	<ul style="list-style-type: none"> <li>After each daily works, the Proponent should ensure that there are no waste left at the mining pit and the work site.</li> </ul>	The mine manager inspects the site for waste after the workers have left.	<b>COMPLIANT</b>	N/A
	<ul style="list-style-type: none"> <li>All domestic and general operational waste produced on a daily basis should be contained until such that time it will be transported to designated waste sites.</li> </ul>	Waste is collected and contained on site until it can be disposed of.	<b>COMPLIANT</b>	N/A

Environmental Feature	Management Actions	Observations	Compliance comment	Corrective Action/Recommendation
	<ul style="list-style-type: none"> <li>No waste may be buried or burned on site or anywhere else.</li> </ul>	Waste is stored on site and removed for disposal once a week.	<b>COMPLIANT</b>	N/A
	<ul style="list-style-type: none"> <li>The mining site should be equipped with separate waste bins for hazardous and general waste/domestic.</li> </ul>	There is no hazardous waste used or generated on site.	<b>COMPLIANT</b>	N/A
	<ul style="list-style-type: none"> <li>A penalty system for irresponsible disposal of waste on site and anywhere in the area should be implemented.</li> </ul>	Workers have been notified of the precautions, however, no penalty system is in place yet.	<b>PARTIALLY COMPLIANT</b>	Implement a penalty system for irresponsible waste disposal on site and surrounding areas.
Health and Safety	<ul style="list-style-type: none"> <li>As part of their induction, the workers should be provided with an awareness training of the risks of mishandling equipment and materials on site.</li> </ul>	Implemented. Training is provided for all new recruits.	<b>COMPLIANT</b>	N/A
	<ul style="list-style-type: none"> <li>During operations on site, employees should be properly equipped with personal protective equipment (PPE) such as coveralls, masks, gloves, safety boots, earplugs, safety glasses, hard hat etc.</li> </ul>	The required PPE is provided to workers during works on site.	<b>COMPLIANT</b>	N/A

Environmental Feature	Management Actions	Observations	Compliance comment	Corrective Action/Recommendation
	<ul style="list-style-type: none"> <li>Workers should not be allowed to consume alcohol or any other intoxicants prior to and during working hours as this may lead to mishandling of equipment which results into injuries and other health and safety risks.</li> </ul>	Consumption of alcohol/intoxicants is prohibited on sites during working hours.  Regular inspection occurs on site.	<b>COMPLIANT</b>	N/A
	<ul style="list-style-type: none"> <li>Employees should not be allowed on site if under the influence of alcohol or any other intoxicants.</li> </ul>	Consumption of alcohol/intoxicants is prohibited on sites during working hours.  Employees found under the influence of alcohol are sent home immediately and given a written warning.	<b>COMPLIANT</b>	N/A
Noise	<ul style="list-style-type: none"> <li>The mining operational times should be set such that, no activity is carried out during the night or very early in the mornings.</li> </ul>	No mining is undertaken at night.  Employees arrive at the mine to begin work at 08:00 each morning on week days.	<b>COMPLIANT</b>	N/A

Environmental Feature	Management Actions	Observations	Compliance comment	Corrective Action/Recommendation
	<ul style="list-style-type: none"> <li>Mining hours should be restricted to between 08h00 and 17h00 to avoid noise generated by mining equipment and the movement of vehicles before or after hours.</li> </ul>	<p>No mining is undertaken at night. Employees arrive at the mine to begin work at 08:00 each morning on week days.</p>	<p><b>COMPLIANT</b></p>	<p>N/A</p>
	<ul style="list-style-type: none"> <li>When operating machinery onsite, workers should be equipped with personal protective equipment (PPE) such as earplugs to reduce noise exposure</li> </ul>	<p>Employees are properly equipped with PPE during works on site</p>	<p><b>COMPLIANT</b></p>	<p>N/A</p>
<p>Soils</p>	<ul style="list-style-type: none"> <li>Spill control preventative measures should be put in place to manage soil contamination, no matter how small the amount of pollution (spill) is.</li> </ul>	<p>There is no hazardous liquids/waste used on this site. Minor fuel/oil spills are attended to immediately.</p>	<p><b>COMPLIANT</b></p>	<p>N/A</p>
	<ul style="list-style-type: none"> <li>Site soils should not be disturbed, if not needed or related to the actual mining works.</li> </ul>	<p>Only the site area directly related to mining works is worked on.</p>	<p><b>COMPLIANT</b></p>	<p>N/A</p>
	<ul style="list-style-type: none"> <li>Overburden material should be handled more efficiently during mining operations to avoid erosion when subjected to erosional processes.</li> </ul>	<p>Overburden material handled efficiently</p>	<p><b>COMPLIANT</b></p>	<p>N/A</p>

Environmental Feature	Management Actions	Observations	Compliance comment	Corrective Action/Recommendation
	<ul style="list-style-type: none"> <li>Prevent the creation of huge piles of waste materials by performing sequential backfilling where possible</li> </ul>	Backfilling is undertaken.	<b>COMPLIANT</b>	N/A
Archaeology and cultural heritage	<ul style="list-style-type: none"> <li>Caution should be exercised when carrying out excavations associated with the mining activities in the event that archaeological/heritage remains are discovered.</li> </ul>	No sites of heritage/archaeological significance discovered on site up to this stage.	<b>COMPLIANT</b>	N/A
	<ul style="list-style-type: none"> <li>The worksite/mining manager should familiarise themselves with the National Heritage Council's regulations</li> </ul>	EDS has provided the Project Manager with relevant NHC regulations/procedures ( <b>Appendix B</b> ).	<b>COMPLIANT</b>	N/A.
Communication	<ul style="list-style-type: none"> <li>The Proponent should appoint a Public Relation Officer (PRO) to liaise with the farmers/landowners.</li> </ul>	Very small operation of 4 staff. Mining site is only on one farm and good relations with the farm owner are maintained.	<b>COMPLIANT</b>	N/A



Environmental Feature	Management Actions	Observations	Compliance comment	Corrective Action/Recommendation
	<ul style="list-style-type: none"> <li>The PRO should be introduced to the neighbors to the site and his or her contact details provided to them prior to undertaking activities for easy communication during the mining activities.</li> </ul>	Mining site is only on one farm and good relations with the farm owner are maintained.	<b>COMPLIANT</b>	N/A
	<ul style="list-style-type: none"> <li>The Proponent should compile a clear communication procedure/plan which should include a grievance mechanism for employees.</li> </ul>	No communication procedures and/grievance mechanism are in place	<b>NON-COMPLIANT</b>	Implement a communication procedure/grievance mechanism for human resources within the company.
COVID-19	<ul style="list-style-type: none"> <li>The workers should be engaged in health talks and training about the dangers of infections such as Covid-19.</li> </ul>	Included in induction for any new staff	<b>COMPLIANT</b>	N/A
	<ul style="list-style-type: none"> <li>Provision of any available public health education information to workers.</li> </ul>	Included in induction for any new staff.	<b>COMPLIANT</b>	N/A
	<ul style="list-style-type: none"> <li>Observation of social distancing, provision of health education on the novel Coronavirus and regular distribution of masks and hand sanitizer on site.</li> </ul>	Observed.	<b>COMPLIANT</b>	N/A

## 2.4 Phase 2: Monitoring Phase Management Action Plans

In order to support and ensure that the mitigation measures are achieving the desired results, a monitoring plan must be implemented. The management action plans recommended for mining operations are presented in **Table 4** below.

**Table 4: Management action plans for the Monitoring Phase and EMP Audit**

Environmental Feature	Management Objectives	Actions/Monitoring	Frequency (Effective upon commencement of operations)	Observation	Compliance	Recommended Action
Soils	<ul style="list-style-type: none"> <li>All measures should be considered to prevent the loss of top soil.</li> </ul>		Weekly	Areas that are not part of the mining/extraction process area remain undisturbed.	<b>COMPLIANT</b>	N/A
Monitoring	<ul style="list-style-type: none"> <li>The ECO or the Proponent/Contractor should monitor the implementation of the EMP to ensure compliance.</li> </ul>		Daily	Regular monitoring (daily and weekly) occurs, and is audited bi-annually by consultant	<b>COMPLIANT</b>	N/A

Environmental Feature	Management Objectives	Actions/Monitoring Frequency (Effective upon commencement of operations)	Observation	Compliance	Recommended Action
	<ul style="list-style-type: none"> <li>The ECO(s) should inspect the site throughout the mining period and after completion.</li> </ul>	Daily	Frequent environmental inspections are observed. External Environmental audits occur and will continue until rehabilitation and closure phase of mine.	<b>COMPLIANT</b>	N/A
Biodiversity	<ul style="list-style-type: none"> <li>Clear only minimal access tracks where necessary, to maintain as much of the remaining natural vegetation on site and to prevent loss of habitat outside areas of mining interest.</li> </ul>	Weekly	There is minimal vegetation in the area.	<b>COMPLIANT</b>	N/A
	<ul style="list-style-type: none"> <li>No equipment should be left leaning on or on top of the site shrubs or trees during and after mining work.</li> </ul>	Weekly	No vegetation within the mining area.	<b>COMPLIANT</b>	N/A

Environmental Feature	Management Objectives	Actions/Monitoring	Frequency (Effective upon commencement of operations)	Observation	Compliance	Recommended Action
Health and Safety	<ul style="list-style-type: none"> <li>Mining workers should be trained on how to handle materials and equipment on site (if they do not already know how to) in order to avoid injuries.</li> </ul>		Daily/Weekly	Training undertaken.	<b>COMPLIANT</b>	N/A
	<ul style="list-style-type: none"> <li>Mining equipment and materials transported to site should be securely fastened to the vehicles (trucks and cars). This is to ensure that the materials and equipment do not fall off the vehicles and cause injuries to anyone while transporting them.</li> </ul>		Daily/Weekly	Equipment is secured to the back of the mine vehicle securely when transporting to and from the mine.	<b>COMPLIANT</b>	N/A

Environmental Feature	Management Objectives	Actions/Monitoring Frequency (Effective upon commencement of operations)	Observation	Compliance	Recommended Action
	<ul style="list-style-type: none"> <li>The proponent and ECO/SHE Officer should ensure that all personnel are provided with appropriate personal protective equipment (PPE), such as gloves, masks, safety boots, safety glasses and hard hats at all times during mining (operation) hours on site to prevent serious injuries or loss of life.</li> </ul>	Daily/Weekly	Staff are provided with the required PPE for mining operations.	<b>COMPLIANT</b>	N/A
	<ul style="list-style-type: none"> <li>No employee should be allowed to consume alcohol or any other intoxicants prior to and during working hours as this may lead to mishandling of equipment which may result into injury and/or other health and safety risks..</li> </ul>	Daily/Weekly	Monitored regularly.	<b>COMPLIANT</b>	N/A

Environmental Feature	Management Objectives	Actions/Monitoring	Frequency (Effective upon commencement of operations)	Observation	Compliance	Recommended Action
Neighbours to the site	<ul style="list-style-type: none"> <li>Mining works schedule should be limited to normal working hours, between 08h00 and 17h00. This is to ensure generated noise does not disturb residents during home hours.</li> </ul>		Weekly	The working hours are adhered to.	<b>COMPLIANT</b>	N/A
Waste	<ul style="list-style-type: none"> <li>The mining site should be kept tidy at all times.</li> </ul>		Daily	Regularly monitored. Adhered to.	<b>COMPLIANT</b>	N/A
	<ul style="list-style-type: none"> <li>All domestic and general construction waste produced on a daily basis should be cleaned and contained daily to prevent environmental pollution.</li> </ul>		Daily	Regularly monitored. Adhered to.	<b>COMPLIANT</b>	N/A
	<ul style="list-style-type: none"> <li>Avoid combining of hazardous and non-hazardous waste by providing separate waste containers (bins) for hazardous and domestic / general waste must be provided on site.</li> </ul>		Daily	Regularly monitored. Adhered to. No hazardous waste is used or generated on site.	<b>COMPLIANT</b>	N/A

Environmental Feature	Management Objectives	Actions/Monitoring	Frequency (Effective upon commencement of operations)	Observation	Compliance	Recommended Action
Transport	<ul style="list-style-type: none"> <li>Mining project workers will be transported, in an SUV/ bus (or similar suitable passenger vehicle) to and from site prevent inhaling of dust.</li> </ul>	Daily	Workers reside on site during the week.	<b>COMPLIANT</b>	N/A	
Vehicular traffic safety	<ul style="list-style-type: none"> <li>All drivers of the project vehicles should be in possession of valid and appropriate driving licenses to operate such vehicles.</li> </ul>	Weekly	Copies of valid driving licenses are on file.	<b>COMPLIANT</b>	N/A	
	<ul style="list-style-type: none"> <li>Project vehicles should be in a roadworthy condition and serviced regularly in order to avoid accidents as a result of mechanical faults of vehicles.</li> </ul>	Weekly	Service undertaken as and when needed.	<b>COMPLIANT</b>	N/A	
	<ul style="list-style-type: none"> <li>Vehicle drivers should not be allowed to operate vehicles while under the influence of alcohol or any other intoxicants.</li> </ul>	Weekly	Monitored regularly.	<b>COMPLIANT</b>	N/A	



Environmental Feature	Management Objectives	Actions/Monitoring	Frequency (Effective upon commencement of operations)	Observation	Compliance	Recommended Action
	<ul style="list-style-type: none"> <li>No heavy trucks or project related vehicles should be parked next to the residents' properties or obstruct the local traffic in any way.</li> </ul>		Weekly	All mine vehicles and equipment is parked at the mining site and only used on site.  (Appendix D, Fig. 5)	<b>COMPLIANT</b>	N/A

## SUMMARY OF COMPLIANCE

This environmental audit has identified 35 management actions and 18 monitoring actions. After on site observation, one (1) out of the 35 management actions has been identified as **Non-compliant**, and two identified as **Partially Compliant**. Thirty-two (32) of the management actions were observed as **Compliant**. All 18 monitoring actions were identified as **Compliant**. The large proportion of compliant action recorded for the environmental audit, therefore, renders the general state of the ongoing Operations and Maintenance phase of the project **Compliant**. According to the overall observation of this audit, Manger Mining have been cautious and have paid attention to the environmental aspects and compliance of this project.

There were no serious issues of Non-Compliance identified during this Environmental Audit.

This environmental audit has identified two issues of Partial Compliance, which may be regarded jointly as one issue, requiring a single solution/intervention. The audit has also identified one issue of Non-compliance. The issues identified have thus far had little to no significant negative effects to the mining operations, the employees and the environment; and are, therefore, regarded as minor non/partial-compliances. The compliance issues are identified as:

1. There is no penalty system for waste disposal and general EMP non-compliance in place
2. There are no communication procedures and grievance mechanisms in place for employees.

## 3 CONCLUSION AND RECOMMENDATIONS

The minor partial and non-compliances identified in this biannual environmental audit report need corrective action in order for the mining operations of Manger Mining CC to reach a 100% Compliance rate. Recommendations for corrective action are as follows:

- Implement a penalty system for EMP Compliance to enforce accountability towards environmental management within mining operations
- Implement a communication procedure/grievance mechanism for human resources within the company.

The potential positive and negative impacts stemming from the mining activities were identified, assessed and mitigation measures made thereof. Mitigation measures need to be adhered to at all times. Most importantly, monitoring of the environmental components described in the Environmental Management Plan should be conducted by the Proponent and an appointed Environmental Health Officer or any applicable Competent Authority.

The next site inspection will be undertaken in September 2022, and a resultant audit report will be produced thereafter.

APPENDIX A:  
**AUDIT OBSERVATIONS**  
**(Pictures)**



A sign at mine entrance restricting access due to mining activity on site



A waste container at a waste collection site on the mine





The mining pit with vegetation on its edge still intact





Mining equipment at storage sites



APPENDIX B:

# **CHANCE FINDS PROCEDURE**

## **(Heritage & Archaeology)**

# CHANCE FINDS PROCEDURE

(After Kinahan, 2020)

Areas of proposed development activity are subject to heritage survey and assessment at the planning stage. These surveys are based on surface indications alone, and it is therefore possible that sites or items of heritage significance will be found during development work. The procedure set out here covers the reporting and management of such finds.

**Scope:** The “*chance finds*” procedure covers the actions to be taken from the discovery of a heritage site or item to its investigation and assessment by a trained archaeologist or other appropriately qualified person.

**Compliance:** The “chance finds” procedure is intended to ensure compliance with relevant provisions of the National Heritage Act (27 of 2004), especially Section 55 (4): “*a person who discovers any archaeological .... object .....must as soon as practicable report the discovery to the Council*”. The procedure of reporting set out below must be observed so that heritage remains reported to the NHC are correctly identified in the field.

Manager/Supervisor must report the finding to the following competent authorities:

- **National Heritage Council of Namibia’s Head Office (061 244 375) and Technical Office (061 301 903)**
- **National Museum (061 276800),**
- **National Forensic Laboratory (061 240461).**

Archaeological material must NOT be touched. Tempering with the materials is an offence under the heritage act and punishable upon conviction by the law.

## Responsibility:

**Operator:** To exercise due caution if archaeological remains are found

**Foreman:** To secure site and advise management timeously

**Superintendent:** To determine safe working boundary and request inspection

**Archaeologist:** To inspect, identify, advise management, and recover remains

**Procedure:**

Action by person identifying archaeological or heritage material:

- a) If operating machinery or equipment stop work
- b) Identify the site with flag tape
- c) Determine GPS position if possible
- d) Report findings to foreman

Action by foreman

- a) Report findings, site location and actions taken to superintendent
- b) Cease any works in immediate vicinity

Action by superintendent

- a) Visit site and determine whether work can proceed without damage to findings
- b) Determine and mark exclusion boundary
- c) Site location and details to be added to project GIS for field confirmation by archaeologist

Action by Archaeologist

- a) Inspect site and confirm addition to project GIS
- b) Advise NHC and request written permission to remove findings from work area
- c) Recovery, packaging and labelling of findings for transfer to National Museum

In the event of discovering human remains

- a) Actions as above
- b) Field inspection by archaeologist to confirm that remains are human
- c) Advise and liaise with NHC and Police
- d) Recovery of remains and removal to National Museum or National Forensic Laboratory, as directed.

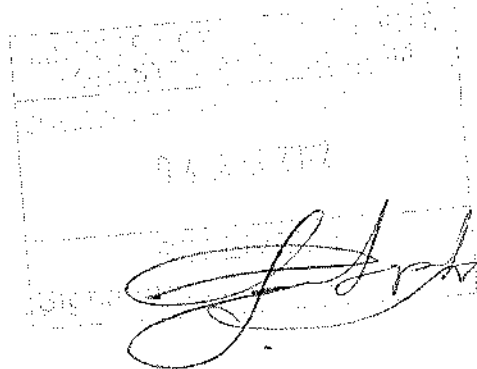


**Excel Dynamic Solutions**  
(PTY) Ltd

Reg. 2019/0817

**31 March 2022**

The Environmental Commissioner  
Department of Environmental Affairs  
Ministry of Environment and Tourism  
Private Bag 13306  
Windhoek



Attention: Mr. Timoteus Mufeti

Dear Sir

**SUBMISSION: BI-ANNUAL ENVIRONMENTAL AUDIT REPORT FOR MINING LICENSE (ML) NO. 91 NEAR USAKOS IN THE KARIBIB DISTRICT, ERONGO REGION, NAMIBIA.**

Excel Dynamic Solutions (Pty) Ltd was appointed by Manger Mining (Pty) Ltd to prepare and submit the bi-annual environmental audit report for the Mining Licence No. 91 located near Usakos in the Erongo Region.

The audit report has been prepared according to the findings of the Scoping Report and the Environmental Management Plan for which an Environmental Clearance Certificate was granted in March 2019. For the purpose of this submission, the bi-annual environmental audit report, as per the requirements of the granted Environmental Clearance Certificate (ECC), is attached.

Please do not hesitate to contact us should you need further information.

Yours faithfully

**Nerson Tjelos**

**Head of Projects**

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