# Bluestate Investments (Pty) Ltd (The Proponent)

Environmental Management Plan (EMP) to support the Application for Environmental Clearance Certificate (ECC) for the Proposed Exploration Activities in the Exclusive Prospecting License (EPL) 8448, **Keetmanshoop District,** //**Karas Region** 



P. O Box 26826 6 Amasoniet Street WINDHOEK, NAMIBIA

# PROPONENT, LISTED ACTIVITIES AND RELATED INFORMATION SUMMARY

TYPE OF AUTHORISATIONS REQUIRING ECC Exclusive Prospecting License (EPL) No. 8448

> NAME OF THE PROPONENT Blustate Investments (Pty) Ltd

COMPETENT AUTHORITY Ministry of Mines and Energy (MME)

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PROPOSED PROJECT Proposed Minerals Exploration / Prospecting activities in the Exclusive Prospecting License (EPL) No. 8448, Keetmashoop District, //Karas Region

> PROJECT LOCATION Keetmanshoop District, //Karas Region (-26.416944, 18.938889)

# ENVIRONMENTAL CONSULTANTS Risk-Based Solutions (RBS) CC

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# **Contents List**

N	ON-TECH	NICAL SUMMARY	V
1.	BACK	GROUND	1 -
	1.1. 1.2. 1.3.	INTRODUCTION PROPOSED SCOPE OF WORK REGULATORY REQUIREMENTS	· 1 - · 1 -
	1.4. 1.5.	LOCATION, LAND USE, INFRASTRUCTURE AND SERVICES	
2.	SUMM	ARY OF THE RECEIVING ENVIRONMENT	5 -
	2.1. 2.2. 2.2.1. 2.2.2. 2.2.3. 2.3. 2.3.	CLIMATE	- 5 - - 5 - - 6 - - 7 - - 8 - - 8 - - 8 -
	2.6.1. 2.6.2. 2.6.2.1. 2.6.2.2.	Overview	8 - 10 - 10 -
3.	OBJE	CTIVES OF THE EMP 1	6 -
	3.1. 3.2. 3.3. <i>3.3.1.</i> <i>3.3.2.</i> 3.4. <i>3.4.1.</i> <i>3.4.2.</i> <i>3.4.3.</i> <i>3.4.4.</i>	SUMMARY OBJECTIVES.       - 1         EMP MANAGEMENT LINKAGES.       - 1         SUMMARY OF IMPACT ASSESSMENT RESULTS       - 1         Summary of Impacts Assessment Methodology       - 1         Summary of Impact Assessment Results.       - 1         IMPLEMENTATION OF THE EMP       - 2         Roles and Responsibilities       - 2         Proponent's Representative (PR) / Project Manager (PM)       - 3         Project Health, Safety and Environment (Project HSE)       - 3         Contractors and Subcontractors.       - 3	16 - 16 - 16 - 35 - 35 - 35 - 35 - 35 - 36 -
4.	EMP N	IITIGATION MEASURES	
	4.1. 4.2.	HIERARCHY OF MITIGATION MEASURES IMPLEMENTATION	
5.	REHAI	BILITATION COMMITMENTS 5	5 -
	5.1. 5.2. <i>5.2.1.</i> <i>5.2.2.</i>	REHABILITATION PROCESS	57 - 57 -
6.	CONC	LUSION AND RECOMMENDATION 5	8 -
	6.1. 6.2. 6.3.	CONCLUSIONS 5 RECOMMENDATIONS 5 SUMMARY TOR FOR TEST MINING AND MINING STAGES 6	59 -
7.	REFEF	- 6	<b>;2</b> -

# **List of Figures**

Figure 1.1:	Detailed regional location of the EPL 8448 and related infrastructure 3 -
Figure 1.2:	Detailed regional location of the EPL 8448, related infrastructure and
	commercial farms and land use surrounding EPL area 4 -
Figure 2.1:	Dominant wind speed and direction of the Keetmanshop (IEM, 2022) 5 -
Figure 2.2:	Vegetation diversity found within and around the EPL No. 8448 area 12 -
Figure 2.3:	Rock types / solid geology found within and around the EPL No. 8448 area 13 -
Figure 2.4:	Soil types / surficial geology found within and around the EPL No. 8448 area 14 -
Figure 2.5:	Groundwater basin and boreholes found within and around the EPL No.
	8448 area 15 -
Figure 3.1:	RBS Schematic presentation of Namibia's Environmental Assessment
	Procedure 18 -

# List of Tables

Table 2.1	Endemic, near endemic, protected and forestry protected species occurring in the general area (National Herbarium of Namibia (WIND). 2020)	6 -
Table 3.1:	Summary of the proposed activities, alternatives and key issues considered during the Environmental Assessment (EA) process covering Scoping, EIA and EMP Processes.	- 19 -
Table 3.2:	Results of the sensitivity assessment of the receptors (Physical, Socioeconomic and Biological environments) with respect to the proposed exploration / prospecting activities.	
Table 3.3:	Results of the scored time period (duration) over which the impact is expected to last	23 -
Table 3.4:	Results of the scored geographical extent of the induced change	
Table 3.5:	Results of the qualitative scale of probability occurrence.	29 -
Table 3.6:	Significant impact assessment matrix for the proposed exploration activities	32 -
Table 4.1:	Key areas of the migration measures	39 -

# NON-TECHNICAL SUMMARY

Bluestate Investments (Pty) Ltd (the "Proponent") has applied for mineral rights under the Exclusive Prospecting License (EPL) No. 8448 with respect Base and Rare Metals, Dimension Stone, Industrial Minerals, Non-Nuclear Fuels Minerals, Nuclear Fuel Minerals, Precious Metals Precious Stones (http://portals.flexicadastre.com/Namibia). The physical license of the EPL 8448 will only be granted by the Mining Commissioner in the Ministry of Mines and Energy (MME) once the Proponent has obtained an Environmental Clearance Certificate (ECC) from the Environmental Commissioner in the Ministry of Environment, Forestry and Tourism (MEFT).

The proposed exploration / prospecting activities covers the following phases:

- (i) Initial desktop exploration activities (no fieldwork undertaken).
- (ii) Regional reconnaissance field-based mapping and sampling activities (Subject to the positive results of (i).
- (iii) Initial local field-based mapping and sampling activities (Subject to the positive results of (ii) above).
- (iv) Detailed local field-based activities such as local geological mapping, geochemical mapping, and sampling, trenching, and drilling of closely spaced boreholes and bulk sampling (Subject to the positive results of (iii) above), and.
- (v) Prefeasibility and feasibility studies (Subject to the positive results of (iv) above.

The scope of the field-based support and logistical activities will be dependent on the scale of proposed exploration activities to be undertaken at any given phase / stage. The proposed / ongoing exploration activities will be supported by existing tracks and campsites / farmstead as well as existing accommodation in the local area as may be applicable. In the absences of existing tracks and depending on the scale of exploration activities being undertaken, the field team will create such new tracks with the permission of the landowner/s and in compliance with the provisions of the EMP and all applicable regulations and standards. In the absences of existing suitable campsite / farmstead, a temporary camp site will be setup at suitable location with the permission of the landowner and in line with the provisions of the EMP. The size of the exploration camp will be of very limited footprint during the initial and detailed field-based exploration phases. In an event of a discovery of economic minerals resources, the exploration campsite may be expanded for the subsequent exploration phases such as prefeasibility and feasibility studies.

The proposed exploration activities are listed in the Environmental Management Act, 2007, (Act No. 7 of 2007) and cannot be undertaken without an Environmental Clearance Certificate (ECC). An application for ECC together with the supporting updated Environmental Scoping and Impact assessment and Environmental Management Plan (EMP) Report was prepared by the Risk-Based Solutions (RBS) CC on behalf of the Proponent and submitted to the Environmental Commissioner in the Ministry of Environment, Forestry and Tourism (MEFT).

The EPL 8448 is located in the Keetmanshoop district, //Karas Region, the EPL is approximately 10 km northeast of Keetmanshop town (Fig 1.1.1.2). The EPL has a total area of 97345 Ha and covers the following commercial privately owned farmlands including: Kubis (Belle Vue), Stampriet, Kameelmund (Marhof), Kloofland, Eisenstein, Gareb, Spitzkoppe, Daweb, Grauhoff, Goris, Aurus, Klein Spitskop, Koppie, Gariganus, and Gariganus. The land uses of the EPL area and surrounding general area is mainly centred on commercial agriculture and tourism freehold land including small stock, intensive agricultural operations, a small portion on the west of the EPL falls within the urban land

The area of the EPL falls within the Nama Karoo. The landscape is extremely barren and rocky with little soil cover. The vegetation consists of dwarf shrubs with some trees in riverbeds. Grass production is highly dependent on rainfall; thus, farming can be a difficult enterprise and livestock densities are low as a result of low vegetation cover and productivity of farmland (Mendelsohn et al. 2002). Generally,

the area of the EPL is regarded as "low to very low" in the overall (all terrestrial species) diversity while the overall terrestrial endemism is "moderate" (Mendelsohn et al. 2002).

The environmental consequence that the proposed exploration and associated infrastructure such as access and campsite would have on the receiving environment will depend on the extent of the proposed activities over the development area, management of the area and how the Proponent eventually implements the proposed mitigation measures. Avoiding sensitive habitats such as Ephemeral River channels, rock heads, mountainous terrains, granite features that might hold archaeological resources as well as track discipline (including no killing/poaching of fauna and unnecessarily cutting down of trees) must be adhered to and/or always enforced. The following is the assessment summary of the likely environmental impacts that the proposed exploration prospecting activities will have on the receiving environment (physical, biological, socioeconomic environments and ecosystem functions, services, use and non-use values or passive uses) without mitigations:

- (i) Initial desktop exploration activities: Overall likely negative impact on the receiving environment will be negligible with extremely unlikely probability of occurrence without mitigations. Overall significant impacts will be negligible, and no field work will take place.
- (ii) Regional reconnaissance field-based activities: Overall likely negative impact on the receiving environment will be negligible with extremely unlikely probability of occurrence without mitigations. Overall significant impacts will be negligible. Some field-based activities will have localised low impacts with low probability of occurrence without mitigations and negligible with mitigations. Overall significant impacts will be negligible.
- (iii) Initial local field-based activities: Initial field-based activities will have localised low impacts with low probability of occurrence without mitigations and negligible with mitigations. Overall significant impacts will be negligible. All desktop related activities and laboratory assessments will have negligible impacts with extremely unlikely probability of occurrence without mitigations. Overall significant impacts will be negligible.
- (iv) Detailed local field-based activities: Overall likely negative impact on the receiving environment will be high and localised impacts without mitigations and localised low impacts with mitigations. Overall significant impacts will be medium without mitigations and low with mitigations, and.
- (v) Prefeasibility and feasibility studies to be implemented on a site-specific area if the local field-based studies prove positive: Overall likely negative impact on the receiving environment will be high and localised impacts without mitigations and localised medium impacts with mitigations. Overall significant impacts will be high without mitigations and low with mitigations for bulk sampling, and field coordination including exploration camp.

The overall severity of potential environmental impacts of the proposed / ongoing project activities on the receiving environment (physical, biological, socioeconomic environments and ecosystem functions, services, use and non-use values or passive uses) will be of low magnitude, temporally duration, localised extent, and low probability of occurrence. Mitigation measures as detailed in Section 6 of the Updated Scoping and EMP Report attached to this application must be implemented and monitored by the Proponent. The proponent shall obtain permission / consent from landowners (surface rights holders) before exercising their subsurface rights for all areas covered by the EPL 8448.

Based on the findings of this updated Scoping and EMP Report, it is hereby recommended that the proposed / ongoing exploration activities by the Proponent be issued with an Environmental Clearance Certificate (ECC) with the following key conditions:

(i) The Proponent shall negotiate Access Agreements with the landowners as may be applicable.

- (ii) In consultation with the landowners and where possible and if key and core conservation, tourism or archaeological resources areas are identified within the EPL area, such areas shall be excluded from the proposed minerals exploration activities.
- (iii) The Proponent shall adhere to all the provisions of the EMP and conditions of the Access Agreement to be entered between the Proponent and the landowner/s in line with all applicable national legislations and regulations.
- (iv) Before entering any private property such as private farms or communal areas, the Proponent shall give advance notices to the surface land rights holders and always obtain permission to access the land to undertake prospecting activities in any given area.
- (v) Mitigation measures shall be implemented as detailed in Section 6 (EMP) of this updated Scoping and EMP report, and.
- (vi) Where possible, and if good quality freshwater is found during the detailed exploration borehole drilling operations, the Proponent shall support other land users in the area in terms of access to good quality freshwater resources for both human consumption, wildlife management and agricultural uses as may be requested by the local community / landowner/s. With permission from the Department of Water Affairs in the Ministry of Agriculture, Water and Land Reform (MAWLR), the abstraction of the groundwater resources shall include water levels monitoring, sampling and quality testing on a biannual basis, and that the affected landowner/s must have access to the results of the water monitoring analyses as part of the ongoing stakeholder disclosure requirements on shared water resources as may be applicable.

Once economic resources are discovered for possible mining operations, a separate field-based and site-specific Environmental Impact Assessment (EIA) and Environmental Management Plan (EMP) shall be undertaken as part of the prefeasibility and feasibility studies. The site-specific EIA and EMP shall cover the area/s identified to have potential economic minerals resources and the assessment shall include the entire planned mine layout areas such as local land uses, pit / shaft, waste rock, tailings dump, access, office blocks, mechanical workshop, water, and energy infrastructure support areas (water, energy, and road / access).

In addition to the site-specific possible mining EIA and EMP Terms of Reference (ToR) to be developed during the prefeasibility study phase, the following field-based and site-specific specialist studies shall be undertaken in an event of a discovery of economic minerals resources that can support the development of a mining project within the EPL No. 8448 area:

- (i) Groundwater studies including modelling as may be applicable.
- (ii) Field-based flora and fauna assessments.
- (iii) Dusts, noise and sound assessments and modelling linked to engineering studies.
- (iv) Socioeconomic assessment, and.
- (v) Others as may be identified / recommended by the stakeholders/ landowners/ Environmental Commissioner or specialists during the prefeasibility and feasibility phases.

#### 2. Summary of the Proposed Mitigation Measures

Avoiding sensitive habitats such as Ephemeral River channels, rock heads and mountainous terrains as well as track discipline (including not killing/poaching of fauna and unnecessarily cutting down of trees) must be adhered to and/or enforced at all times. Mitigation measures shall be implemented as detailed in this EMP report and includes the following:

- 1. Project planning and implementation.
- 2. Implementation of the EMP.
- 3. Public and stakeholders' relations.
- 4. Measures to enhance positive socioeconomic impacts.
- 5. Environmental awareness briefing and training.
- 6. Erection of supporting exploration infrastructure.
- 7. Use of existing access roads, tracks and general vehicle movements.
- 8. Mitigation measures for preventing flora destruction.
- 9. Mitigation measures for preventing faunal destruction.
- 10. Mitigation measures to be implemented with respect to the exploration camps and exploration sites.
- 11. Mitigation measures for surface and groundwater protection as well as general water usage.
- 12. Mitigation measures to minimise negative socioeconomic impacts.
- 13. Mitigation measures to minimise health and safety impacts.
- 14. Mitigation measures to minimise visual impacts.
- 15. Mitigation measures to minimise vibration, noise and air quality.
- 16. Mitigation measures for waste (solid and liquid) management.
- 17. Rehabilitation plan, and.
- 18. Environmental data collection.

# 3. Conclusions and Recommendations of the EMP

Based on the findings of the EIA and the mitigation measures provided in this EMP Report, it is hereby recommended that the proposed exploration activities be issued with an Environmental Clearance Certificate (ECC). The following is the summary of the key conditions that shall be implemented by the Proponent for the proposed project activities:

- (i) The Proponent will undertake to implement the conditions of the land lease agreements to be concluded with the owners of the land as may be required to support the proposed exploration activities.
- (ii) The proponent shall implement and adhere to all the provisions of this EMP report.
- (iii) Mitigation measures shall be implemented as detailed in this EMP report.

- (iv) Rehabilitation must be undertaken at all times.
- (v) The Proponent shall adhere to all the applicable national regulations and standards as well as Good International Industry Practice (GIIP) that defines leading industry best practices as provided for in the Equator Principles and International Finance Corporation (IFC) environmental management guidelines and frameworks, and.
- (vi) The Proponent shall adopt the precautionary approach / principles in instances where baseline information, national or international guidelines or mitigation measures have not been provided or do not sufficiently address the site-specific project impact.

The following are the recommended actions (roles and responsibility) to be implemented by the Proponent as a part of the management of the impacts through implementations of this EMP Report:

- (i) Appoint an Environmental Control Officer to lead and further develop, implement and promote environmental culture through awareness raising of the workforce, contractors and sub-contractors in the field during the whole duration of the proposed project.
- (ii) Provide with other support, human and financial resources, for the implementation of the proposed mitigations, rehabilitation plans and effective environmental management during the planned mine project life cycle.
- (iii) Develop a simplified environmental induction and awareness programme for all the workforce, contractors and sub-contractors.
- (iv) Where contracted service providers are likely to cause environmental impacts, these will need to identify and contract agreements need to be developed with costing provisions for environmental liabilities.
- (v) Implement internal and external monitoring of the actions and management strategies developed during the project duration and a final Environmental Monitoring report to be prepared by the Environmental Control Officer and to be submitted to the regulators, and.
- (vi) Develop and implement a monitoring programme that will fit into the overall company's Environmental Management Systems (EMS) as well as for any future EIA related to the expansion of the current delineated resources or development of completely new mine site within the EPL area.

All the responsibilities to ensure that the recommendations and provisions of this EMP Report are executed accordingly, rest with the Proponent. The Proponent shall provide all appropriate resource requirements for the implementation of this EMP as well as an independently managed (not directly controlled by the company) funding instrument for rehabilitation and associated environmental liabilities.

It is the responsibility of the Proponent to make sure that all members of the workforce including contractors and subcontractors are aware of the provisions of this EMP and its objectives. It is hereby recommended that the Proponent take all the necessary steps to implement all the recommendations of this EMP for the successful execution of the proposed exploration programme.

# 1. BACKGROUND

# 1.1. Introduction

**Bluestate Investments (Pty) Ltd,** the Proponent, holds mineral rights under Exclusive Prospecting License (EPL) No. 8448, and intend to undertake exploration activities covering desktop studies, followed by field-based regional and detailed site-specific explorations activities using techniques such as desktop studies, geophysical surveys, geological mapping, trenching, drilling and bulk sampling. The summary of the EPL is as follows:

**	Type of License:	Exclusive Prospecting License (EPL) No.8448

- EPL Holder and Proponent: Bluestate Investments (Pty) Ltd
- ✤ Application Date: 10/11/2020
- Commodities: Base and Rare Metals, Dimension Stone, Industrial Minerals, Non-Nuclear Fuels Minerals, Nuclear Fuel Minerals, Precious Metals Precious Stones.
- ✤ Size of the EPL: 97345 Ha

# 1.2. Proposed Scope of Work

The Proponent intends undertake exploration activities covering desktop studies: the purchase and interpretation of the existing Government high resolution airborne geophysical data sets, regional reconnaissance assessment covering field-based activities such as regional mapping and sampling to identify and verify potential targeted areas as delineated during the desktop stage, geological mapping, sampling, surveying and possible widely spaced trenching and drilling to test the viability of any delineated local target based on the regional data collected under localised site-specific detailed geological mapping, trenching, bulk sampling, surveying, and detailed drilling to determine the feasibility of the delineated local targets. If the detailed exploration activities lead to positive results, the exploration data collected will then be put together into a prefeasibility report and if the prefeasibility results prove positive, a detailed feasibility study supported by detailed site-specific drilling, bulk sampling and laboratory testing / test mining will be undertaken on the identified site-specific area.

# 1.3. Regulatory Requirements

The proposed prospecting activities are listed in the Environmental Management Act, 2007, (Act No. 7 of 2007) and the EIA Regulations, 2012 and cannot be undertaken without an Environmental Clearance Certificate (ECC). The Proponent is required to have undertaken Environmental Assessment comprising this Environmental Impact Assessment (EIA) and Environmental Management Plan (EMP) reports for the proposed minerals prospecting activities.

In fulfilment of the environmental requirements, the Proponent appointed Earth Environmental Services (EES) CC as the Environmental Consultants led by Ms Emerita Ashipala as the Environmental Assessment Practitioner in the preparation of the EIA and EMP Reports in order to support the application for ECC.

# 1.4. Location, Land Use, Infrastructure and Services

The EPL 8448 is located in the Keetmanshop district, //Karas Region, the EPL is approximately 10 km northeast of Keetmanshop town (Fig 1.1.1.2). The EPL has a total area of 97345 Ha and covers the following commercial privately owned farmlands including: Kubis (Belle Vue), Stampriet, Kameelmund (Marhof), Kloofland, Eisenstein, Gareb, Spitzkoppe, Daweb, Grauhoff, Goris, Aurus, Klein Spitskop, Koppie, Gariganus, and Gariganus (Fig 1.1.1.2).

The land uses of the EPL area and surrounding general area is mainly centred on commercial agriculture and tourism freehold land including small stock, intensive agricultural operations (Figs. 1.1 - 1.2).

# 1.5. Supporting Infrastructure and Services

The EPL area is accessible from Keetmanshop on the B1 road, via the M29, C17 and C16 gravel road (Figs. 1.1 -1.2). Private minor roads may require high clearance  $4 \times 4$  vehicles and may only be used with permission from the landowners (Fig. 1.1-1.2).

The following supporting infrastructures and services will be required if detailed field-based studies such as geological mapping, trenching, or drilling need to be conducted following the delineation of potential targets requiring field verifications and / or investigations:

- (i) External and internal roads network: The Proponent will use the already existing external and internal road networks during the exploration phase (Fig 1.1 and 1.2).
- Water supply: Raw water will be sourced from local groundwater resources (Fig. 2.5). The Proponent will utilise the existing boreholes with permission from the landowners. The exploration activities such as drilling operations will require limited water resources which could also be supplied by a tanker truck.
- (iii) Energy: The proposed exploration operations will use diesels and solar energy as may be required for exploration equipment and lighting, respectively, and.
- (iv) Accommodation and other supporting facilities and services: The exploration team will utilise the exiting accommodation facilities and services in the area. In absence of such facilities and services, the Proponent will provide onsite camping accommodation and supporting portable infrastructures such as chemical toilets as well as other requirements as may be applicable. The establishment of an exploration camp will only be done with thepermission of the landowner.

If, required, field-based exploration activities will only be conducted once an Access Agreement has been concluded with the affected landowner/s.

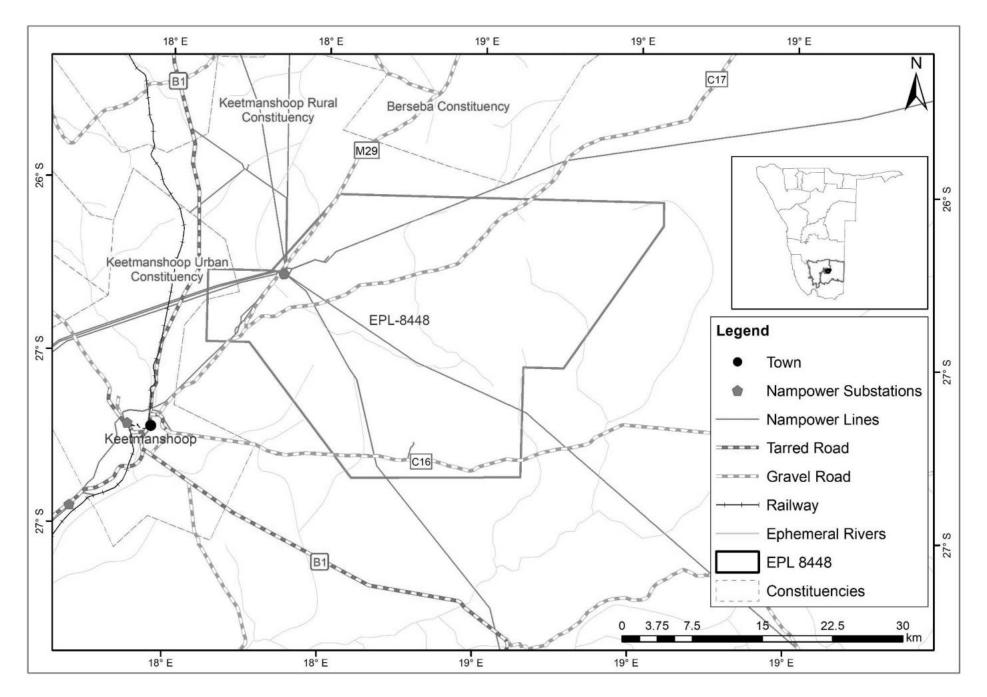


Figure 1.1: Detailed regional location of the EPL 8448 and related infrastructure.

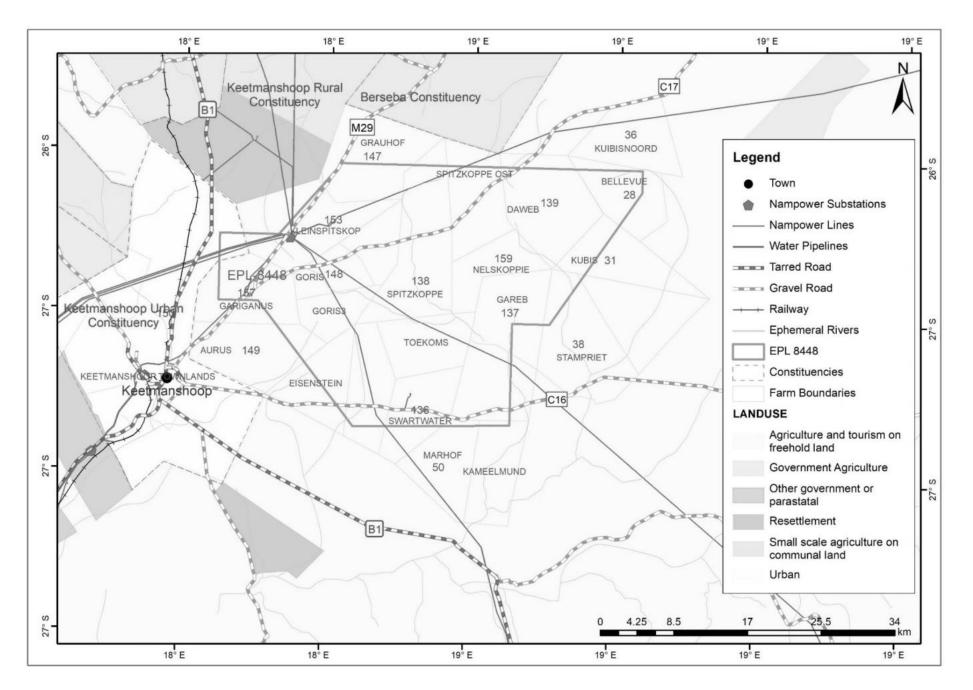


Figure 1.2: Detailed regional location of the EPL 8448, related infrastructure and commercial farms and land use surrounding EPL area

# 2. SUMMARY OF THE RECEIVING ENVIRONMENT

# 2.1. Climate

The Karas Region is an arid zone with low and erratic rainfall as a result of low rainfall, vegetation is generally sparse and limited.

The general area of the EPL falls within the subtropical desert climate. Precipitation of the area is characterised by relatively low summer rainfall (average 50-230 mm per year) mainly in February, March, and April, but the extreme south-western areas of Karas receive occasional winter rain. Year to year variability of rainfall is very high, whereas years without significant rainfall are normal.

The project area does not have a weather station with reliable wind records. However, based on the regional wind patterns, the prevailing wind in the area seems to be dominated by winds from the northeastern and southwestern quadrants with an average wind speed of 3.4 meters per second. Locally, the situation may be different dues various influences including topographic effects.

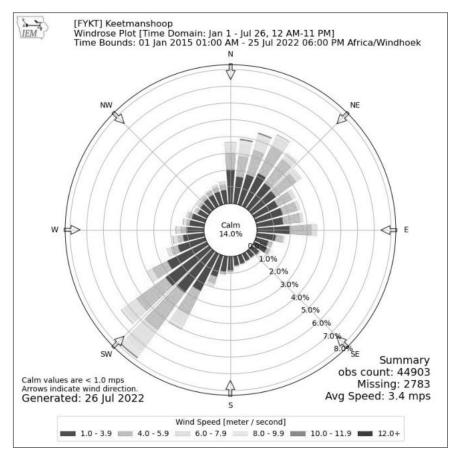


Figure 2.1: Dominant wind speed and direction of the Keetmanshop (IEM, 2022).

# 2.2. Biological Diversity

# 2.2.1. Overview

The area of the EPL falls within the Nama Karoo. This large, flat-lying plateau dominates much of southern Namibia. The landscape is extremely barren and rocky with little soil cover. The vegetation consists of dwarf shrubs with some trees in riverbeds. Grass production is highly dependent on rainfall; thus, farming can be a difficult enterprise and livestock densities are low as a result of low vegetation cover and productivity of farmland (Mendelsohn et al. 2002). Generally, the area of the EPL is regarded as "low to very low" in the overall (all terrestrial species) diversity while the overall terrestrial endemism is "moderate" (Mendelsohn et al. 2002).

## 2.2.2. Flora

Important tree and shrub species are the endemic (*Aizoanthemum dinteri, Aloe pachygaster Dinter*) etc, near endemic (*Aloidendron dichotomum, Blepharis gross, Commiphora glaucescens* etc), species protected under the Forestry Ordinance No. 37 of 1952 and/or Forest Act No. 72 of 1968 (*Acacia erioloba, Boscia albitrunca, Maerua schinzii, Parkinsonia africana Sond*) Table 2.1. The EPL falls within the Nama Karoo with extremely diverse vegetation cover as indicated in Fig. 4.1.

Table 2.1 Endemic, near endemic, protected and forestry protected species occurring in the general area (National Herbarium of Namibia (WIND). 2020).

SPECIES	ENDEMISM	PROTECTED
Abutilon pycnodon Hochr.		
Acacia erioloba E.Mey.		Forestry Protected
Aizoanthemum dinteri (Schinz)		
Friedrich	Endemic	
Aloe pachygaster Dinter	Endemic	Protected
Aloidendron dichotomum (Masson)		
Klopper & Gideon F.Sm.	Near Endemic	Protected
Anisostigma schenckii (Schinz) Schinz	Endemic	
Blepharis fleckii P.G.Mey.	Endemic	
Blepharis grossa (Nees) T.Anderson	Near Endemic	
Blepharis spinifex Merxm.	Endemic	
Boscia albitrunca (Burch.) Gilg &		
Gilg-Ben.		Forestry Protected
Cleome suffruticosa Schinz	Endemic	
Commiphora glaucescens Engl.	Near Endemic	
Crassula muscosa L. var. muscosa		Protected
Euphorbia lignosa Marloth	Near Endemic	
Euphorbia spartaria N.E.Br.	Endemic	
Lapeirousia gracilis Vaupel	Endemic	
Maerua schinzii Pax		Forestry Protected
Merremia bipinnatipartita (Engl.)		
Hallier f.	Endemic	
Mollugo walteri Friedrich	Endemic	
Monechma calcaratum Schinz	Endemic	
Monsonia trilobata Kers	Endemic	
Monsonia umbellata Harv.	Near Endemic	
Myxopappus acutilobus (DC.)		
Källersjö	Near Endemic	
Namophila urotepala U.MüllDoblies & D.MüllDoblies	Endemic	
Ondetia linearis Benth.	Endemic	
Ozoroa namaensis (Schinz & Dinter)	Endernic	
R.Fern.	Near Endemic	
Parkinsonia africana Sond.		Forestry Protected
Pavonia rehmannii Szyszyl.	Endemic	
Pegolettia oxyodonta DC.	Near Endemic	
Petalidium setosum C.B.Clarke ex		
Schinz	Near Endemic	
Psilocaulon gessertianum (Dinter &		
A.Berger) Dinter & Schwantes	Endemic	

SPECIES	ENDEMISM	PROTECTED
Ptycholobium biflorum (E.Mey.)		
Brummitt subsp. biflorum	Near Endemic	
Ruschia odontocalyx (Schltr. & Diels)		
Schwantes	Endemic	Protected
Sisyndite spartea E.Mey. ex Sond.	Near Endemic	
Solanum dinteri Bitter	Endemic	
Solanum rigescentoides Hutch.	Endemic	
Tephrosia dregeana E.Mey. var.		
dregeana	Near Endemic	
Tripteris nervosa Hutch.	Endemic	

# 2.2.3. Fauna

#### Reptile

Diversity Approximately 261 species of reptiles are known or expected to occur in Namibia thus supporting approximately 30% of the continent's species diversity (Griffin 1998a). At least 22% or 55 species of Namibian lizards are classified as endemic. The occurrence of reptiles of "conservation concern" includes about 67% of Namibian reptiles (Griffin 1998a).

The high percentage of endemic reptile species (39%) associated with the general south-central part of Namibia underscores the importance of area. The most important reptiles in the area are viewed as those classified as vulnerable and protected game under Namibian legislation – i.e. Stigmochelys pardalis, *Psammobates oculiferus, Psammobates tentorius verroxii, Python natalensis & Varanus albigularis. Tortoises – e.g. Stigmochelys pardalis, Psammobates oculiferus, Psammobates tentorius verroxii – are viewed as the group of reptiles most under threat in Namibia (Griffin 1998a). Reptile species of concern are the burrowing species such as the blind snakes <i>Rhinotyphlops boylei* and *Rhinotyphlops schinzi* as these species are very difficult to study (and observe) with very little known about their ecological role and actual status in Namibia. However, none of these species are exclusively associated with the proposed development site.

#### Amphibian Diversity

Amphibians are declining throughout the world due to various factors of which much has been ascribed to habitat destruction. Basic species lists for various habitats are not always available with Namibia being no exception in this regard while the basic ecology of most species is also unknown. Approximately 4,000 species of amphibians are known worldwide with just over 200 species known from southern Africa and at least 57 species expected to occur in Namibia. 6 Griffin (1998b) puts this figure at 50 recorded species and a final species richness of approximately 65 species, 6 of which are endemic to Namibia. This "low" number of amphibians from Namibia is not only as a result of the generally marginal desert habitat, but also due to Namibia being under studied and under collected. Most amphibians require water to breed and are therefore associated with the permanent water bodies, mainly in northeast Namibia. There is no permanent surface water in the study area. Any frog species present would be adapted to opportunistic breeding in ephemeral pools after rains. The loss of habitat would be limited to the actual footprint of the exploration. Of the 14 species of frogs that may occur in the study area, two are of conservation interest – the Dombe Dwarf Toad (*Poyntonophrynus dombensis*) and the Spotted Rubber Frog (*Phrynomantis affinis*). They may be rare and seasonal in the area.

#### Mammal Diversity

Namibia is well endowed with mammal diversity with at least 250 species occurring in the country. These include the well-known big and hairy as well as a legion of smaller and lesser-known species. Currently 14 mammal species are considered endemic to Namibia of which 11 species are rodents and small carnivores of which very little is known. Most endemic mammals are associated with the Namib and escarpment with 60% of these rock dwelling (Griffin 1998c). About 61-75 species of mammals likely occurs in the study area.

#### Bird Diversity

Although Namibia's avifauna is comparatively sparse compared to the high rainfall equatorial areas elsewhere in Africa, approximately 658 species have already been recorded with a diverse and unique group of arid endemics (Brown et al. 1998, Maclean 1985). Fourteen species of birds are endemic or near endemic to Namibia with the majority of Namibian endemics occurring in the savannas (30%) of which ten species occur in a north-south belt of dry savannah in central Namibia (Brown et al. 1998). The area has relatively low bird diversity with only about 81-110 species of likely occurrence.

## 2.3. Soils

The area of the EPL 8448 is dominated by Eutric Leptosols and rock outcrops (Fig.4.3). Leptosols typically form in actively eroding landscapes, especially in the hilly or undulating areas that cover much of southern and north-western Namibia (Mendelsohn et al. 2002). These coarse-textured soils are characerised by their limited depth caused by the presence of a continuous hard-rock highly calcareous or cemented layer within 30 cm of the surface. The leptosols are, therefore, the shallowest soils to be found in Namibia and they often contain much gravel. As a result, their water-holding capacity is low, and vegetation in areas in which they occur is often subject to drought. Rates of water run-off and water erosion can be high when heavy rains all. At best, these soils can support low densities of livestock and wildlife (Mendelsohn et al. 2002).

# 2.4. Geology

Namibia's varied geology encompasses rocks of Archaean to Cenozoic age, thus covering more than 2 600 million years (Ma) of Earth history (Mendelsohn et al. 2002). Much of the southern part of Namibia is underlain by sedimentary rocks of the Nama Group and thus forms the large hydrogeological unit of the Fish River Basin and the Keetmanshoop-Aroab area. Due to their predominantly horizontal bedding, rocks of the Nama Group tend to weather and erode in layers, resulting in flat plains, with major drainages forming canyons and gorges. Erosion produces rock fragments or clay-size particles, and rivers accumulate very little sandy alluvium. The western boundary of the Nama Group is clearly defined as the major escarpment adjacent to the Schwarz and, while to the east, the escarpment of the Weissrand, made up by younger deposits of the Stampriet basin, forms the natural boundary. The geology consists of Dwyka shale and tillite of the Karoo Sequence, which are intruded by dolerite dykes and shale (Nama Group), which is generally a weak aquifer (Fig 4.2).

## 2.5. Water

Rock types of the Nama Group are inherently impermeable with little or no primary porosity. Groundwater is hosted in secondary features like faults and joints in sedimentary rocks of clastic origin (sandstone, quartzite, and shale) and in solution features in limestones and dolomites. Lack of recharge and poor groundwater quality in most areas further aggravates the situation. In the //Kharas region water levels are generally shallow in the east, close to the course of the Fish River, but become progressively deeper towards the escarpment in the west, where water levels deeper than 200m are recorded. The EPL falls within the Fish River basin (Fig. 4.4). Drilling targets are mostly tectonic features such as faults and joints. The largest town and regional centre, source water from a surface water scheme fed from Naute Dam whereas smaller towns like Aroab, Maltahöhe, Kalkrand, Gibeon, Berseba, and Bethanie rely on groundwater extracted from aquifers in Nama sediments.

## 2.6. Socioeconomic

#### 2.6.1. Overview

The //Kharas Region has an estimated population of 76000 (CBS, 2011), the average population density being 0.5 persons per square kilometre. The predominant languages in the region are Nama and Damara, Afrikaans although Otjherero and Oshiwambo are also commonly spoken. The region has been divided into seven constituencies, namely the Nami-#Nus, Berseba, Oranjemund, Karasburg east,

Karasburg west, Keetmanshoop Urban, and Keetmanshoop Rural. The EPL falls within the Berseba constituency.

The following is a summary of the socio – economic setting of the EPL area:

- According to the Namibia 2001 Population and Housing Census, //Karas had a population of 69,329 (32,346 females and 36,976 males or 114 males for every 100 females) growing at an annual rate of 1.3% (National Statistics Agency (NSA), 2016 and 2013).
- About 54% lived in urban areas, while 46% lived in rural areas, and with an area of 161,215 km<sup>2</sup>, the population density was 0.4 persons per km<sup>2</sup>.
- By age, 11% of the population was under 5 years old, 20% between 5 and 14 years, 63% between 15and 59 years, and 6% 60 years and older.
- The population was divided into 15,481 households, with anaverage size of 4.1 persons; 35% of households had a female head of the house, while 65% had a male. For those 15 years and older, 69% had never married, 20% married with a certificate, 2% married traditionally, 5% married consensually, 1% were divorced or separated, and 2% were widowed.
- For those 15 years and older, the literacy rate was 87%. Nearly 45% of the population are from coloured and white Namibian groups. In terms of education, 52% of girls and 48% of boys between the ages of 6 and 15 were attending school, and of those 15 years and older, 77% had left school, 7% were currently at school, and 7% had never attended.
- According to the 2012 Namibia Labour Force Survey, unemployment in the //Karas Region stood at 23.9% (National Statistics Agency (NSA), 2016 and 2013). Among households, 94% had safe water, 26% had no toilet facility, 50% had electricity for lighting, 81% had access to radio, and 35% had wood or charcoal for cooking. In terms of households' main sourcesof income, 7% derived it from farming, 69% from wages and salaries, 6% from cash remittances, 5% from business or nonfarming, and 10% from pensions (National Statistics Agency (NSA), 2016 and 2013).
- For every 1,000 live births, 37 female and 56 male infant deaths occurred. The life expectancy at birth was 61 years for females and 54 for males (National Statistics Agency (NSA), 2016 and 2013). Among children younger than 15, 4% had lost a mother, 6% had a father, and 1% were orphaned by both parents. About 3% of the entire population had a disability, of which 22% were deaf, 29% blind, 10% had a speech disability, 13% had hand disability, 27% had leg disability, and 7% had mental disability.
- There has been a proportional decline in the //Karas Regions population as only 3.66% of the country's population live in the region and the region's population is growing at a slower rate (1.1%) than the national growth rate (1.4%).
- There is a high migration rate from especially the north central regions to the //Karas region.
- There is only slightly more males than female indicating that either migratory male job seekers had moved away from the region (a possible explanation for the negative growth rate in the Lüderitz/!Nami=nüs constituency) or that more females are being employed by companies that historically employed men.
- ✤ A high proportion (63%) of the population is of working age (between 15 and 59 years);
- There is a large urban population (54% compared to 43% nationally) and 92.4% of the residents in the Lüderitz /!Nami=nüs constituency live in the town.
- The main source of income in the region is wages and salaries (72%) and the fishing and mining industries are the largest employers, and.

There is a high labour force participation rate of 75.4% for the region.

Locally, the EPL falls within the Keetmanshop Rural constituency with the following socio – economic summary:

- Keetmanshoop Urban was the most densely populated among all constituencies, with a density of 37.1 persons per square kilometre. On the other hand, Keetmanshoop Rural was the least densely populated constituency with a density of 0.2 persons per square kilometre.
- Keetmanshoop Urban constituency accommodated over 25 percent of the total population, or 19,447 persons - up from 22.8 percent 10 years ago. Only 9.3 percent of the population (7,219 persons) lived in the Keetmanshoop Rural constituency.
- The regional adult literacy rate was 96.6 percent with no major difference between males and females. The adult literacy rate in urban areas stood at 98.0 percent compared to 94.9 percent in rural areas. Furthermore, adult literacy was 93.6%.
- The labour force participation rate for the //Karas Region was 75.4 percent. The rate was higher for males (79.6%) than for females (70.9%). There was no difference in the Labour force participation rate in rural and urban areas (75.4% each). The labour force participation rates for Keetmanshop Rural constituency were 72.3%
- Higher proportion of unemployed females than males in all constituencies were actively looking for work. However, the highest proportion of job seekers of both sexes in Keetmanshop Rural was 21.4%

#### 2.6.2. Archaeology, Historical and Cultural Resources

#### 2.6.2.1. Regional Archaeological Setting

Modern humans and their ancestors have lived in Namibia for more than one million years, and there are fossil remains of lineal hominin ancestors as early as the Miocene Epoch (Kinahan, 2017). Namibia has a relatively complete sequence covering the mid-Pleistocene to Recent Holocene period, represented by thousands of archaeological sites mainly concentrated in the central highlands, escarpment, and Namib Desert. According to Kinahan, (2017), the Recent Holocene archaeological sequence in Namibia, i.e., the last 5 000 years, is of particular importance because it provides the background evidence for the development and recent history of the indigenous peoples of Namibia before the advent of written historical records during the colonial era. Many archaeological sites from this period are of great significance to the understanding of Namibian history, and some are of global importance.

#### 2.6.2.2. Local Archaeological Setting and Recommendation

In the absence of field-based assessment being undertaken, it is likely that the general area around the EPL area may have archaeological resources that are protected by the National Heritage Act, 2004 (Act No. 27 of 2004) under the National Heritage Council of Namibia. The EPL area is likely to have evidence from the early colonial period related to a combination of mining, trade, missionary, and indigenous tribes' activities. The expectation is therefore:

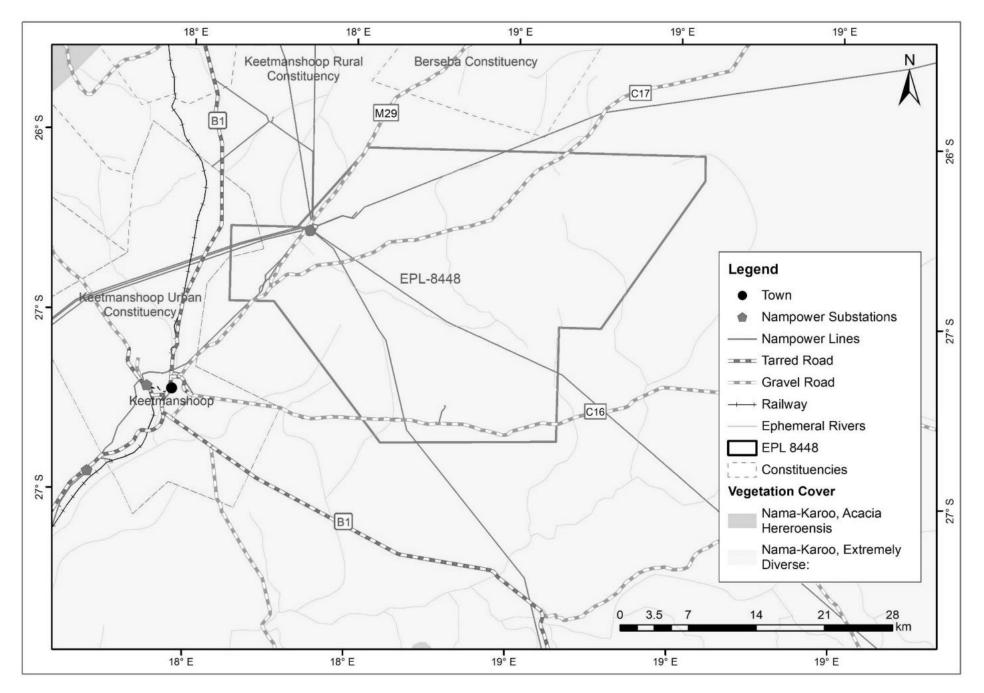
- (i) A high likelihood of Holocene age archaeological sites, including rock art, associated with outcropping granite in the EPL area, and.
- (ii) A high likelihood of late precolonial and colonial settlement sites.

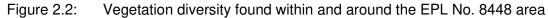
The following are the key recommended actions related to archaeology in the EPL Area:

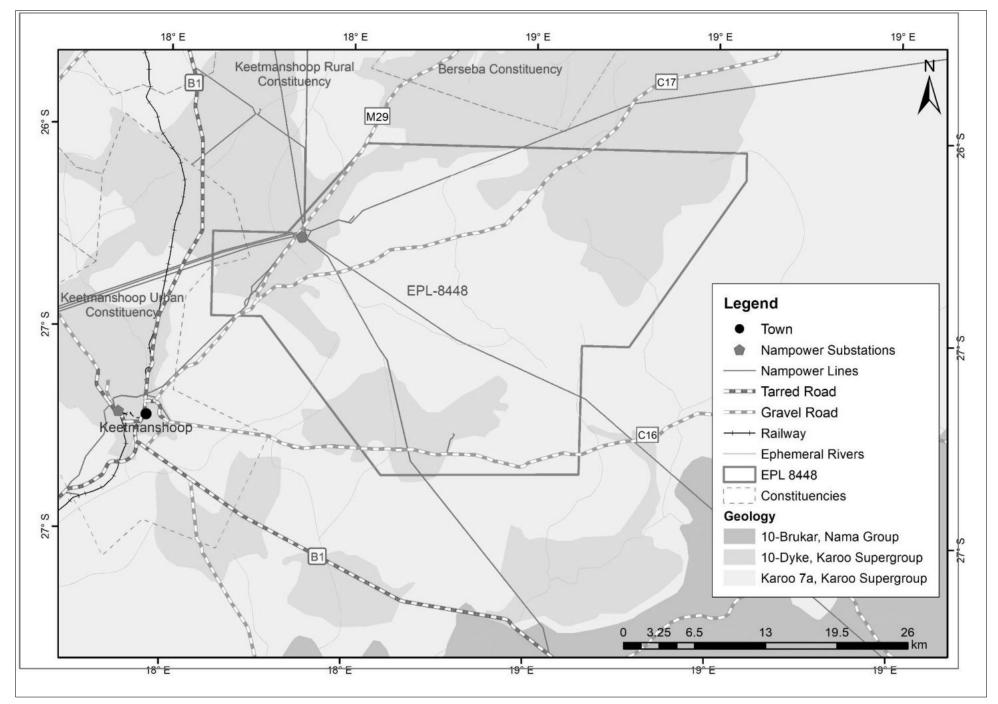
- (i) The exploration team should be made aware that under the National Heritage Act, 2004 (Act No. 27 of 2004) any items protected under the definition of heritage found in the course of the prospecting process should be reported to the National Heritage Council.
- (ii) The chance finds procedure as outlined in the EMP must be always implemented, and.
- (iii) Detailed field survey should be carried out if suspected archaeological resources or major natural cavities / shelters have been unearthed during the prospecting process.

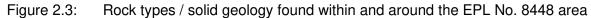
According to stakeholders' input, there are presence of Mesosaurus fossil sites on the farm: Portion 2 of Farm Spitskoppe Ost No.159, and the Remainder of Farm 159, Spitskoppe Ost No. 159, and Portion 1 of the Farm Spitzkoppie Ost (Nelskoppe) No 159. These need to be taken into consideration during any field – based activities.

Furthermore, the Proponent must not disturb major natural shelters or cavities that may be unearthed because they could hold some highly significant historical or cultural sites that would require detailed documentation and possibly mitigation measures to be adopted in the event of encroachment by the proposed exploration activities.









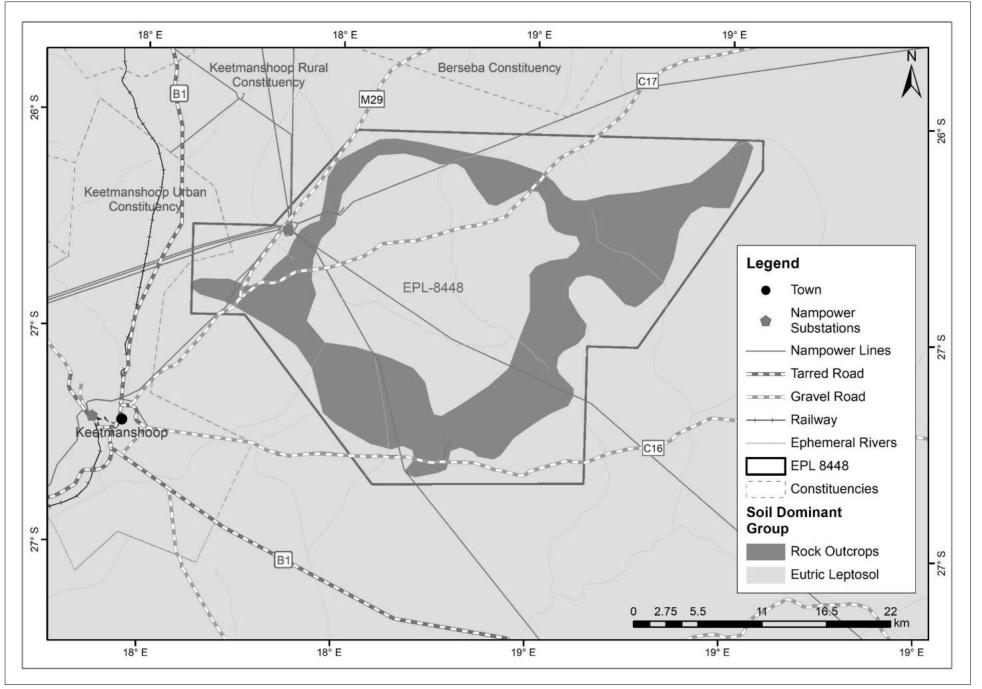


Figure 2.4: Soil types / surficial geology found within and around the EPL No. 8448 area

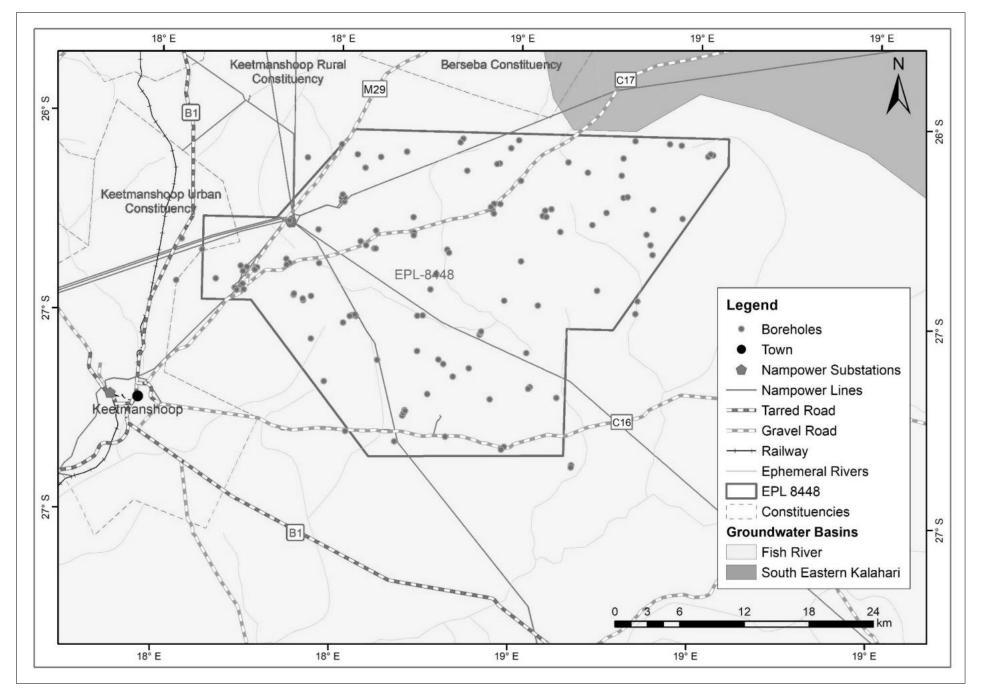


Figure 2.5: Groundwater basin and boreholes found within and around the EPL No. 8448 area

Bluestate Investments cc- EPL 8448

# 3. OBJECTIVES OF THE EMP

# 3.1. Summary Objectives

This EMP provides a detailed plan of actions required in the implementation of the mitigation measures for minimising and maximising the identified negative and positive impacts respectively. The EMP also provides the management actions with roles and responsibilities requirements for the successful implementation of environmental management strategies by Proponent.

# 3.2. EMP Management Linkages

The mitigation measures described in this EMP report are based on the impacts assessment results detailed in the EIA Report. The EMP must be continuously updated during the implementation of the proposed project activities and throughout the project lifecycle. This EMP Reports incorporates the provisions of the Namibian Environmental regulations and policies as well as international environmental best practices in mining development, operational, rehabilitation, and closure and aftercare activities.

# 3.3. Summary of Impact Assessment Results

## 3.3.1. Summary of Impacts Assessment Methodology

The EIA and EMP process used for this project took into considerations the provisions of the Environmental Impact Assessment (EIA) Regulations, 2012 and the Environmental Management Act (EMA), 2007, (Act No. 7 of 2007) as outlined in Fig. 3.1.

The Proponent intends undertake exploration activities covering desktop studies, followed by sitespecific activities on targets that may be delineated and using exploration techniques/ methods such as geophysical surveys, geological mapping, trenching, drilling, bulk sampling and test mining. The detailed outline of all the activities associated with each of the exploration stages as sources of potential environmental impacts are outlined in Table 3.1. The impact assessment methodology adopted a two-dimensional matrix approach in predicting the potential impacts of the proposed project on the receiving environment. The two-dimensional matrix consisted of the following cross-referencing (Table 3.3 - Table 3.4):

- The activities linked to the project that could have an impact on the receiving environment, and.
- The existing environmental and social conditions that could possibly be affected by the project.

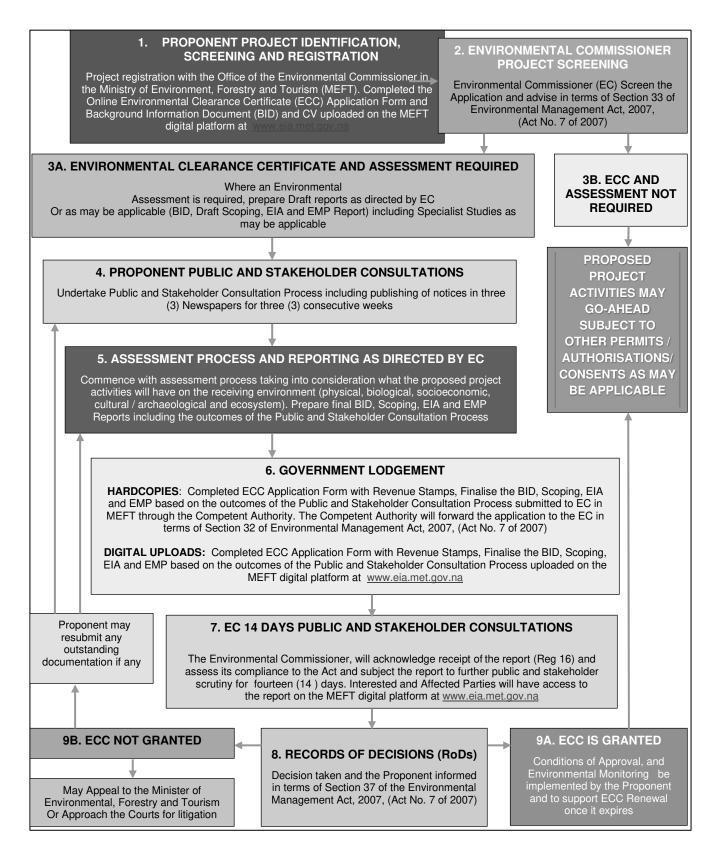
The impact assessment considerations included land disturbance/land use impacts. potential impacts to specially designated areas. impacts to soil, water and air resources. impacts to vegetation, wildlife, wildlife habitat, and sensitive species. Visual, cultural, paleontological, socioeconomic and potential impacts from hazardous materials are provided in the EIA Report.

## 3.3.2. Summary of Impact Assessment Results

In order to determine the likely environmental impacts as well as the overall significant impacts of individual sources associated with the proposed exploration activities within the EPL area (Table 3.6), an impact identification and assessment process was undertaken as detailed in this report. Details of the impact assessment results, definitions, methodology as well as the baseline \ receiving environment are provided in the EIA Report.

As detailed in the EIA Report, the significant impact identification and assessment processes focused on the evaluation of the influences of the proposed project activities pathways and the likely targets or receptor (receiving environment). In this process, components of the project activities that are likely to impact the natural environment (physical, biological, and socioeconomic) were broken down into individual development stages and activities.

The summary of the overall impact and significant impact assessment results as detailed in the EIA Report associated with the proposed activities / sources of potential impacts with respect to the receiving environment that could potentially be affected are presented in Table 3.2 -Table 3.5.



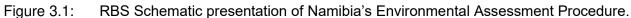


Table 3.1:Summary of the proposed activities, alternatives and key issues considered during the<br/>Environmental Assessment (EA) process covering Scoping, EIA and EMP Processes.

	PROJECT	ACTIVITIES		ALTERNATIVES	-	aluated and Assessed al Management Plan
	THOULOT	AONNILO		CONSIDERED		Measures Developed
1.	Project Implementation and Initial Desktop Exploration Activities	Review of existing information and all previous activities in order identify any potential target/s in within the EPL Area	(i)	Location for Minerals Occurrence: A number of economic deposits are known to exist in different parts of Namibia and some have been	coexistence between	Water Quality
2.	Regional Reconnaissance Field-Based	Reginal mapping and sampling to identify and verify potential targeted areas based on the recommendations of the desktop work undertaken under (1) above May include: Widely		explored by different companies over the years. The proponent intends to explore / prospect for possible economic minerals occurrence in the EPL area as licensed. Minerals occurrence is linked to the geology or local rock outcrops and	PHYSICAL ENVIRONMENT	<ul> <li>Physical infrastructure and Resources</li> <li>Air quality,</li> <li>Noise and dust</li> <li>Landscape and topography value</li> <li>Soil quality</li> <li>Climate Change</li> </ul>
3.	Initial Local Field-Based Activities	spaced geological mapping, sampling, surveying and possible trenching and drilling in order to determine the viability of any delineated local target/s		Site-specific. Other Alternative Land Uses: Game farming, tourism and agriculture Ecosystem Function (What the Ecosystem	BIOLOGICAL ENVIRONMENT	<ul> <li>Influences</li> <li>Habitat Protected Areas</li> <li>Flora</li> <li>Fauna</li> <li>Ecosystem functions, services, use</li> </ul>
4.	Detailed Local Field-Based Activities on Delineated Targets If Any	Following the delineation of potential target/s, conduct detailed mapping, trenching, sampling, surveying and drilling in order to determine the viability of the project.	(v) (vi)	Does. Ecosystem Services. Use Values. Non-Use, or Passive Use. )The No-Action	SOCIOECONOMIC, CULTURAL AND	<ul> <li>values and non- Use or passive use</li> <li>Local, regional and national socioeconomic settings</li> <li>Commercial Agriculture</li> <li>Community Protected Areas</li> </ul>
5.	Prefeasibility and Feasibility Studies	Assess the viability of any delineated local target/s and more detailed mapping, trenching, bulk sampling, drilling and test mining activities where applicable. If the project proves viable, a feasibility report and application for Mining License will be undertaken.	(vii	Alternative i) Others to be identified during the public consultation process and preparation of the EIA and EMP Reports	ARCHAEOLOGICAL ENVIRONMENT	<ul> <li>Protected Areas</li> <li>Tourism and Recreation</li> <li>Cultural, Biological and Archaeological Resources</li> </ul>

Table 3.2: Results of the sensitivity assessment of the receptors (Physical, Socioeconomic and Biological environments) with respect to the proposed exploration / prospecting activities.

RECEPT	RECEPTOR SENSITIVITY				IENT		I	1	BIOL	.ogic/	AL ENV	/IRONN	MENT	SOCIOECONOMIC, CULTURAL AND ARCHAEOLOGICAL ENVIRONMENT					
SENSI 1 2 3 4 5	TIVITY RATING Negligible Low Medium High Very High	CRITERIA     The receptor or resource is resistant to change or is of little environmental value.     The receptor or resource is tolerant of change without detriment to its character,     is of low environmental or social value, or is of local importance.     The receptor or resource has low capacity to absorb change without     fundamentally altering its present character, is of high environmental or social     value, or is of national importance     The receptor or resource has moderate capacity to absorb change     without significantly altering its present character, has some environmental or     social value, or is of district/regional importance.     The receptor or resource has little or no capacity to absorb change     without fundamentally altering its present character, is of very high     environmental or social value, or is of international importance.	Water Quality	Physical infrastructure and Resources	Air Quality, Noise and Dust	Landscape Topography	Soil Quality	Climate Change Influences	Habitat	Protected Areas	Flora	Fauna	Ecosystem functions, services, use values and non-Use or passive use	Local, regional and national socioeconomic settings	Commercial Agriculture	Community Protected Areas	Tourism and Recreation	Cultural, Biological and Archaeological Resources	
Initial De		General evaluation of satellite, topographic, land tenure, accessibility, supporting infrastructures and socioeconomic environment data	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	
Exploration Activities		Purchase and analysis of existing Government high resolution magnetics and radiometric geophysical data	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	
		Purchase and analysis of existing Government aerial hyperspectral	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	
		Data interpretation and delineating of potential targets for future reconnaissance regional field-based activities for delineated targets	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	
		Regional geological, geochemical, topographical and remote sensing mapping and data analysis	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	
Regional Reconna Field-Bas	aissance sed	Regional geochemical sampling aimed at identifying possible targeted based on the results of the initial exploration and regional geological, topographical and remote sensing mapping and analysis undertaken	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	
Activities	5	Regional geological mapping aimed at identifying possible targeted based on the results of the initial exploration and regional geological, topographical and remote sensing mapping and analysis undertaken	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	
		Limited field-based support and logistical activities including exploration camp site lasting between one (1) to two (2) days	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	
		Laboratory analysis of the samples collected and interpretation of the results and delineating of potential targets for future detailed site-specific exploration if the results are positive and supports further exploration of the delineated targets	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	

RECEPTOR SENSIT	EPTOR SENSITIVITY				Ι	Ι		BIOL	.OGIC,	AL EN\	/IRONN	MENT	SOCIOECONOMIC, CULTURAL AND ARCHAEOLOGICAL ENVIRONMENT						
SENSITIVITY RATIN												use use							
1 Negligible	The receptor or resource is resistant to change or is of little environmental value.		and	IST			es					s, u ve L	al al		as		S		
2 Low	The receptor or resource is tolerant of change without detriment to its character, is of low environmental or social value, or is of local importance.		ire ar	nd Du	aphy		nence		S			, services, or passive	national ettings	ulture	d Areas		cal and esource		
3 Medium	The receptor or resource has low capacity to absorb change without fundamentally altering its present character, is of high environmental or social value, or is of national importance	Water Quality	l infrastructu Resources	Joise ar	Topogi	Soil Quality	nge Infli	Habitat	Protected Areas	Flora	Fauna	ions, se Jse or p	מס	al Agricı	rotecte	Tourism and Recreation	iologica cal Res		
4 High	The receptor or resource has moderate capacity to absorb change without significantly altering its present character, has some environmental or social value, or is of district/regional importance.	Water	Physical infrastructure Resources	Air Quality, Noise and Dust	Landscape Topography	Soil 6	Climate Change Influences	На	Protect	Ē	Е	m funct Id non-l	cal, regional and nation socioeconomic settings	Commercial Agriculture	Community Protected	Touri Recr	Cultural, Biological rchaeological Reso		
5 Very High	The receptor or resource has little or no capacity to absorb change without fundamentally altering its present character, is of very high environmental or social value, or is of international importance.		Phys	Air Q	Lan		Clima					Ecosystem functions, values and non-Use c	Local, soci	Co	Comn		Cul Arch		
	Local geochemical sampling aimed at verifying the prospectivity of the target/s delineated during regional reconnaissance field activities	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2		
	activities																		
Initial Local Field-	Local geological mapping aimed at identifying possible targeted based on the results of the regional geological and analysis undertaken	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2		
Based Activities	Ground geophysical survey (Subject to the positive outcomes of i and ii above)	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2		
	Possible Trenching (Subject to the outcomes of i - iii above)	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3		
	Field-based support and logistical activities will be very limited focus on a site-specific area for a very short time (maximum five (5) days)	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2		
	Laboratory analysis of the samples collected and interpretation of the results and delineating of potential targets	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2		
Detailed Local	Access preparation and related logistics to support activities	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3		
Field-Based Activities	Local geochemical sampling aimed at verifying the prospectivity of the target/s delineated during the initial field-based activities	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3		
	Local geological mapping aimed at identifying possible targeted based on the results of the regional geological and analysis undertaken	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3		
	Ground geophysical survey, trenching, drilling and sampling (Subject to the positive outcomes of i and ii above).	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3		
Prefeasibility and Feasibility Studies	Detailed site-specific field-based support and logistical activities, surveys, detailed geological mapping	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3		
	Detailed drilling and bulk sampling and testing for ore reserve calculations	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3		
	Geotechnical studies for mine design	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3		

RECEP	ECEPTOR SENSITIVITY			SICAL IRONN	IENT				BIOL	.OGIC/	AL ENV	'IRONN	IENT	SOCIOECONOMIC, CULTURAL AND ARCHAEOLOGICAL ENVIRONMENT					
SENS 1 2 3 4 5	SITIVITY RATING Negligible Low Medium High Very High	CRITERIA The receptor or resource is resistant to change or is of little environmental value. The receptor or resource is tolerant of change without detriment to its character, is of low environmental or social value, or is of local importance. The receptor or resource has low capacity to absorb change without fundamentally altering its present character, is of high environmental or social value, or is of national importance The receptor or resource has moderate capacity to absorb change without significantly altering its present character, has some environmental or social value, or is of district/regional importance. The receptor or resource has little or no capacity to absorb change without fundamentally altering its present character, is of very high environmental or social value, or is of international importance.	Water Quality	Physical infrastructure and Resources	Air Quality, Noise and Dust	Landscape Topography	Soil Quality	Climate Change Influences	Habitat	Protected Areas	Flora	Fauna	Ecosystem functions, services, use values and non-Use or passive use	egional al economic	Commercial Agriculture	Community Protected Areas	Tourism and Recreation	Cultural, Biological and Archaeological Resources	
		Mine planning and designs including all supporting infrastructures (water, energy and access) and test mining activities	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	
		EIA and EMP to support the ECC for mining operations	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	
		Preparation of feasibility report and application for Mining License	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	

Table 3.3:Results of the scored time period (duration) over which the impact is expected to last.

RECEPTOR SENSI	ΓΙVΙΤΥ		PHYSIC		ENT				BIOL	.OGIC/	AL ENV	(IRONN	MENT	SOCIOECONOMIC, CULTURAL AND ARCHAEOLOGICAL ENVIRONMENT					
SCALE	DESCRIPTION		-	e and	Dust	phy		souces					'ices, use ssive use	tional ngs	ure	Areas		and urces	
т	Temporary	2	Aun -	cture	and	ogra	ty	nflue		reas			serv or pa	d na settii	ricult	cted	and tion	ical a esot	
Р	Permanent	Matar Ouality	r Qua	l infrastruct Resources	Noise	e Top	Soil Quality	inge l	Habitat	ted A	Flora	Fauna	tions, Use c	nal an omic	al Ag	Protec	ism a reatic	tiolog cal R	
		Mate	. wate	Physical infrastructure Resources	Air Quality, Noise and Dust	Landscape Topography	Soil	Climate Change Influences	H	Protected Areas		Ĕ	Ecosystem functions, services, values and non-Use or passive	Local, regional and national socioeconomic settings	Commercial Agriculture	Community Protected Areas	Tourism and Recreation	Cultural, Biological and Archaeological Resources	
Initial Desktop	General evaluation of satellite, topographic, accessibility, supporting infrastructures and senvironment data		- 1	т	т	Т	Т	Т	т	т	т	т	т	Т	Т	т	т	т	
Exploration Activities	Purchase and analysis of existing Governme magnetics and radiometric geophysical data		ר   י	т	Т	т	Т	Т	т	т	т	т	т	Т	Т	т	т	т	
	Purchase and analysis of existing Governme hyperspectral	ent aerial T	· 1	т	Т	Т	Т	Т	т	т	т	т	Т	Т	Т	т	т	т	
	Data interpretation and delineating of potent reconnaissance regional field-based activitie targets		- 1	т	т	т	т	т	т	т	т	т	т	т	т	т	т	т	
	Regional geological, geochemical, topograp sensing mapping and data analysis	hical and remote T	· 1	т	Т	Т	Т	Т	Т	Т	т	Т	Т	Т	Т	Т	Т	Т	
Regional Reconnaissance Field-Based	Regional geochemical sampling aimed at ide targeted based on the results of the initial ex regional geological, topographical and remote and analysis undertaken	ploration and	- т	Т	т	т	т	т	т	т	т	т	т	т	т	т	т	т	
Activities	Regional geological mapping aimed at identi targeted based on the results of the initial ex regional geological, topographical and remote and analysis undertaken	ploration and te sensing mapping	- т	Т	т	т	т	т	т	т	т	т	т	т	т	т	т	т	
	Limited field-based support and logistical active exploration camp site lasting between one (1	) to two (2) days	·   1	т	Т	Т	Т	Т	Т	Т	Т	Т	Т	Т	Т	т	Т	Т	
	Laboratory analysis of the samples collected the results and delineating of potential targe site-specific exploration if the results are pos further exploration of the delineated targets	l and interpretation of ts for future detailed	- 1	т	Т	Т	т	т	Т	т	т	т	т	т	т	Т	т	Т	

RECEPTOR SENSIT	ΓΙVΙΤΥ		HYSI NVIR		ENT	1	1		BIOL	.OGIC/	AL EN\	/IRONN	MENT	SOCIOECONOMIC, CULTURAL AND ARCHAEOLOGICAL ENVIRONMENT					
SCALE T P	DESCRIPTION Temporary Permanent	Mator Ouality		Physical infrastructure and Resources	Air Quality, Noise and Dust	Landscape Topography	Soil Quality	Climate Change Influences	Habitat	Protected Areas	Flora	Fauna	Ecosystem functions, services, use values and non-Use or passive use	Local, regional and national socioeconomic settings	Commercial Agriculture	Protected Areas	Tourism and Recreation	Cultural, Biological and Archaeological Resources	
		4cM		Physical in Re	Air Quality,	Landscap	Soi	Climate Ch		Prote			Ecosystem fun values and non	Local, regic socioecol	Commerc	Community Protected	Tou	Cultural, Archaeolog	
Initial Local Field- Based Activities	Local geochemical sampling aimed at verifying the prospect of the target/s delineated during regional reconnaissance fin activities	tivity eld T	. 1	т	т	т	т	т	т	т	т	т	т	т	т	т	т	Т	
	Local geological mapping aimed at identifying possible targ based on the results of the regional geological and analysis undertaken	eted 5 T	• -	Т	Т	т	т	т	т	т	т	т	т	т	т	т	т	Т	
	Ground geophysical survey (Subject to the positive outcom i and ii above)	es of T	. 1	Т	Т	т	Т	т	Т	т	т	Т	т	т	Т	т	Т	Т	
	Possible Trenching (Subject to the outcomes of i - iii above	) Т	. 1	т	Т	Т	Т	Т	Т	Т	Т	Т	Т	Т	Т	Т	Т	Т	
	Field-based support and logistical activities will be very limit focus on a site-specific area for a very short time (maximum (5) days)	ted	. 1	т	т	т	т	т	т	т	т	т	т	т	т	т	т	Т	
	Laboratory analysis of the samples collected and interpreta the results and delineating of potential targets	tion of T	. 1	т	т	т	т	т	т	т	т	т	Т	Т	т	т	Т	Т	
	Access preparation and related logistics to support activitie	s T	. 1	Т	Т	Т	Т	Т	Т	Т	Т	Т	Т	Т	Т	Т	Т	Т	
Detailed Local Field-Based	Local geochemical sampling aimed at verifying the prospect of the target/s delineated during the initial field-based activity	ties	. 1	Т	Т	Т	Т	Т	Т	Т	Т	Т	Т	Т	Т	Т	Т	Т	
Activities	Local geological mapping aimed at identifying possible targ based on the results of the regional geological and analysis undertaken	s T	. 7	т	Т	т	т	т	т	т	т	т	т	т	т	т	т	Т	
	Ground geophysical survey, trenching, drilling and sampling (Subject to the positive outcomes of i and ii above).	-	. 1	Т	Т	Т	Т	Т	Т	Т	т	Т	Т	Т	Т	Т	Т	Т	
	Detailed site-specific field-based support and logistical activity surveys, detailed geological mapping		. 1	Т	Т	Т	Т	Т	Т	Т	Т	Т	Т	Т	Т	Т	Т	Т	
Prefeasibility and Feasibility Studies	Detailed drilling and bulk sampling and testing for ore reser calculations	ve T	. 1	Т	Т	Т	Т	Т	т	Т	Т	Т	Т	Т	Т	Т	Т	Т	
	Geotechnical studies for mine design	Т	1	Т	Т	Т	Т	Т	Т	Т	Т	Т	Т	Т	Т	Т	Т	Т	

					PHYSICAL ENVIRONMENT							AL ENV	/IRONI	MENT	SOCIOECONOMIC, CULTURAL AND ARCHAEOLOGICAL ENVIRONMENT					
SCA T P	LE	DESCRIPTION Temporary Permanent		Water Quality	Physical infrastructure and Resources	Air Quality, Noise and Dust	Landscape Topography	Soil Quality	Climate Change Influences	Habitat	Protected Areas	Flora	Fauna	Ecosystem functions, services, use values and non-Use or passive use	gional and national conomic settings	Commercial Agriculture	Community Protected Areas	Tourism and Recreation	Cultural, Biological and Archaeological Resources	
	infr	ne planning and designs including astructures (water, energy and acc ivities	all supporting cess) and test mining	т	т	т	т	т	т	т	т	Т	т	Т	т	т	т	Т	Т	
	EIA	and EMP to support the ECC for	mining operations	т	т	Т	т	т	т	т	т	т	Т	Т	Т	т	Т	Т	Т	
		eparation of feasibility report and a ense	pplication for Mining	Т	т	т	т	т	Т	т	т	Т	т	Т	Т	т	Т	Т	Т	

#### Table 3.4:Results of the scored geographical extent of the induced change.

GEOGRAPHICAL EXTENT OF IMPACT		PHYSICAL ENVIRONMENT							.OGICA	L ENV	'IRONN	MENT	SOCIOECONOMIC, CULTURAL AND ARCHAEOLOGICAL ENVIRONMENT				
SCALE	DESCRIPTION	Water Quality	Physical infrastructure and Resources	Air Quality, Noise	Landscape Topography	Soil Quality	Climate Change Influences	Habitat	Protected A	Flora	Fauna	Ecosystem functions, services, use values and non-Use or passive use	Local, regional and nationa socioeconomic settings	Commercial Agriculture	Community Protected Areas	Tourism and Recreation	Cultural, Biological and Archaeological Resources
L	limited impact on location	ţ	astru	Voise	Торо		ange		Areas			funct non-	nal a mic s	l Agri	Prot		ologic
0	impact of importance for municipality		lotur	e an	grap		Influ					ions Jse	nd n ettin	cult	ecte		ial a
R	impact of regional character		e ar	and Dust	ohy		ienc					, sei or p	iatio igs	lre	d Ar		nd A
N	impact of national character		nd R	Jst			ës					vice assi	nal		eas		<b>\rch</b> a
M	impact of cross-border character		eso									ve u					aeol
5.° X.			urces									se se					ogica
Initial Desktop	General evaluation of satellite, topographic, land tenure, accessibility, supporting infrastructures and socioeconomic environment data	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L
Exploration Activities	Purchase and analysis of existing Government high resolution magnetics and radiometric geophysical data	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L
	Purchase and analysis of existing Government aerial hyperspectral	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L
	Data interpretation and delineating of potential targets for future reconnaissance regional field-based activities for delineated targets	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L
	Regional geological, geochemical, topographical and remote sensing mapping and data analysis	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L
Regional Reconnaissance Field-Based	Regional geochemical sampling aimed at identifying possible targeted based on the results of the initial exploration and regional geological, topographical and remote sensing mapping and analysis undertaken	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L
Activities	Regional geological mapping aimed at identifying possible targeted based on the results of the initial exploration and regional geological, topographical and remote sensing mapping and analysis undertaken	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L
	Limited field-based support and logistical activities including exploration camp site lasting between one (1) to two (2) days	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L
	Laboratory analysis of the samples collected and interpretation of the results and delineating of potential targets for future detailed site-specific exploration if the results are positive and supports further exploration of the delineated targets	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L

GEOGRAPHICAL EXTENT OF IMPACT			PHYSICAL ENVIRONMENT							L ENV	IRONN	MENT	SOCIOECONOMIC, CULTURAL AND ARCHAEOLOGICAL ENVIRONMENT				
7		Water Quality	Physic	Air Qu	Landscape	Soil Quality	Climat	Habitat	Protected Areas	Flora	Fauna	Ecosystem functions, services, use values and non-Use or passive use	Local, regional and national socioeconomic settings	Commercial Agriculture	Comm	Tourism and Recreation	Cultural, Biological and Resources
SCALE DESCRIPTION		Qua	ál in	ality	cape	ualit	te Cr	1 <sup>44</sup>	ted	ted	ш ш	sterr anc	regi	nerci	luniț	m ar atior	al, B ırces
L	limited impact on location	lity	frast	Noi	, Top	~	nang		Area			1 fun	onal omic	al Aç	/ Pro	_ д	iolog
0	impact of importance for municipality		ruct	Air Quality, Noise and Dus	Topography		Climate Change Influences		ò			ction 1-Use	and sett	gricu	otect		jical
R	impact of regional character		ure a		aphy							ıs, se e or	natii ings	lture	Community Protected Areas		and
N	impact of national character		Physical infrastructure and Resources	ust								ervic pass	onal				Arch
M	impact of cross-border character				I							es, L ive L					laeo
8			urces									ISe ISe					Archaeological
Local geochemical sampling aimed at verifying the prospectivity of the target/s delineated during regional reconnaissance field activities		L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L
	Local geological mapping aimed at identifying possible targeted based on the results of the regional geological and analysis undertaken	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L
Initial Local Field- Based Activities	Ground geophysical survey (Subject to the positive outcomes of i and ii above)	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L
	Possible Trenching (Subject to the outcomes of i - iii above)	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L
	Field-based support and logistical activities will be very limited focus on a site-specific area for a very short time (maximum five (5) days)	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L
	Laboratory analysis of the samples collected and interpretation of the results and delineating of potential targets	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L
	Access preparation and related logistics to support activities	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L
Detailed Local	Local geochemical sampling aimed at verifying the prospectivity of the target/s delineated during the initial field-based activities	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L
Field-Based Activities	Local geological mapping aimed at identifying possible targeted based on the results of the regional geological and analysis undertaken	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L
	Ground geophysical survey, trenching, drilling and sampling (Subject to the positive outcomes of i and ii above).	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L
	Access preparation and related logistics to support activities	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L
Detailed Local	Local geochemical sampling aimed at verifying the prospectivity of the target/s delineated during the initial field-based activities	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L
Field-Based Activities	Local geological mapping aimed at identifying possible targeted based on the results of the regional geological and analysis undertaken	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L

GEOGRAPHICAL E	XTENT OF IMPACT		SICAL IRONN	1ENT				BIOL	.OGIC/	AL ENV	/IRON	MENT	CUL <sup>-</sup> ARC	IOECO FURAL HAEOL RONM	AND .OGIC	,	
SCALE	DESCRIPTION	Water Qu	Physical infrastructure	Air Quality,	Landscape	Soil Quality	Climate (	Habitat	Protected	Flora	Fauna	Ecosystem functions, values and non-Use c	Local, regional socioeconomic	Commercial Agriculture	Community	Tourism and Recreation	Cultural, Biological Resources
L	limited impact on location	Quality	infras	ty, No		lity	) Change		d Areas			stem functions, services, use and non-Use or passive use	giona nomi	cial A	ity Pr	and	Biolo 9S
0	D impact of importance for municipality		struct	Noise a	Topography				as			nctio n-Us	l anc c set	gricu	otec		gical
R	impact of regional character			and [	aphy		Influences					ns, s e or	and national settings	ılture	Protected Areas		and
N	impact of national character		and F	Dust			lces					ervic pass	onal	-	Vreas		Arch
M	impact of cross-border character		Reso									es, u ive u					iaeol
2. F 8. 6			Resources									se se					Archaeological
	Ground geophysical survey, trenching, drilling and sampling (Subject to the positive outcomes of i and ii above).	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L
	Detailed site-specific field-based support and logistical activities surveys, detailed geological mapping	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L
Prefeasibility and Feasibility Studies	Detailed drilling and bulk sampling and testing for ore reserve calculations	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L
	Geotechnical studies for mine design	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L
	Mine planning and designs including all supporting																
	infrastructures (water, energy and access) and test mining activities	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L
	EIA and EMP to support the ECC for mining operations	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L
	Preparation of feasibility report and application for Mining License		L	L	L	L	L	L	L	L	L	L	L	L	L	L	L

IMPACT PROBABIL	ITY OCCURRENCE		SICAL	1ENT					.OGIC/	AL ENV		MENT	CUL <sup>-</sup> ARC	IOECO TURAL HAEOL IRONM	AND OGIC	AL	
ì		Water Quality	Physic	Air Quality, Noise and Dust	Lands	Soil Quality	Climate Change Influences	Habitat	Protected Areas	Flora	Fauna	Ecosy: values	Local, regional and national socioeconomic settings	Commercial Agriculture	Community Protected Areas	Tourism and Recreation	Cultural, Biological and Resources
SCALE	DESCRIPTION	Qu	alir	ality	cape	Jalit	e C	-	ted			sten	regi	erci	unit	m a atior	зI, Е rces
Α	Extremely unlikely (e.g. never heard of in the industry)	ality	ıfra	Z	ъ т	×	nan		Are			n fu	ona	al A	y P	bu	iolo
В	Unlikely (e.g. heard of in the industry but considered unlikely)		stru	Dise	jode		ge I		as			ncti	ll ar	vgrio	rote		gic
С	Low likelihood (egg such incidents/impacts have occurred but are uncommon)		cture	and I	andscape Topography		Influer					ons, s Jse or	nd nat ettings	culture	cted /		al and
D	Medium likelihood (e.g. such incidents/impacts occur several times per year within the industry)		and R	Dust			nces					ervice passi	ional	Ű	Areas		
E	High likelihood (e.g. such incidents/impacts occurs several times per year at each location where such works are undertaken)		Physical infrastructure and Resource									Ecosystem functions, services, use values and non-Use or passive use					Archaeologica
Initial Desktop	General evaluation of satellite, topographic, land tenure, accessibility, supporting infrastructures and socioeconomic environment data	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A
Exploration Activities	Purchase and analysis of existing Government high resolution magnetics and radiometric geophysical data	А	А	А	А	А	А	А	А	А	А	А	А	А	А	А	А
	Purchase and analysis of existing Government aerial hyperspectral	А	А	А	А	А	А	А	А	А	А	А	А	А	А	А	А
	Data interpretation and delineating of potential targets for future reconnaissance regional field-based activities for delineated targets	А	A	A	A	A	A	A	A	A	A	A	A	A	А	A	A
	Regional geological, geochemical, topographical and remote sensing mapping and data analysis	А	A	A	А	A	А	А	A	А	А	А	A	А	А	A	А
Regional Reconnaissance Field-Based	Regional geochemical sampling aimed at identifying possible targeted based on the results of the initial exploration and regional geological, topographical and remote sensing mapping and analysis undertaken	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A
Activities	Regional geological mapping aimed at identifying possible targeted based on the results of the initial exploration and regional geological, topographical and remote sensing mapping and analysis undertaken	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A
	Limited field-based support and logistical activities including exploration camp site lasting between one (1) to two (2) days	В	В	В	В	В	В	В	В	В	В	В	В	В	В	В	В
	Laboratory analysis of the samples collected and interpretation of the results and delineating of potential targets for future detailed	А	А	А	А	А	А	А	А	А	А	А	А	А	А	А	А

## Table 3.5:Results of the qualitative scale of probability occurrence.

IMPACT PROBABIL	ITY OCCURRENCE		SICAL IRONN	IENT				BIOL	.OGIC#	AL ENV	(IRONI	MENT		<b>FURAL</b>	LOGIC/ IENT	AL	
<u></u>		Water Quality	Physic	Air Quality, Noise and Dus	Lands	Soil Quality	Climate Change Influences	Habitat	Protected	Flora	Fauna	Ecosy values	Local, regional and nationa socioeconomic settings	Commercial Agriculture	Community Protected Areas	Tourism and Recreation	Cultur Resou
SCALE	DESCRIPTION	Q	<u>à</u>	ality	cap	uali	ie C	÷.	ted			ster an	reg	lerc	luni	m a atio	al, E Irce
Α	Extremely unlikely (e.g. never heard of in the industry)	ality	nfra	, Z	e T	ţ	har		Areas			n fu na	ion	ial /	t⊽ P	n	Biolo
В	Unlikely (e.g. heard of in the industry but considered unlikely)		stru	oise	opo		Ige		eas			on-L	al a ic s	Agri	rote		ogic
С	Low likelihood (egg such incidents/impacts have occurred but are uncommon)		icture	e and	.andscape Topography		Influe					ions, s Jse or	nd nat ettings	culture	ected .		al and
D	Medium likelihood (e.g. such incidents/impacts occur several times per year within the industry)	8	and F	Dust	Y		nces					ervice	ional	Ū	Areas		Arch
E	High likelihood (e.g. such incidents/impacts occurs several times per year at each location where such works are undertaken)	8	Physical infrastructure and Resources									Ecosystem functions, services, use values and non-Use or passive use					Cultural, Biological and Archaeological Resources
	site-specific exploration if the results are positive and supports further exploration of the delineated targets		es														cal
	Local geochemical sampling aimed at verifying the prospectivity of the target/s delineated during regional reconnaissance field activities	А	A	A	А	A	A	А	A	A	A	А	A	A	A	A	A
Initial Local Field- Based Activities	activitiesLocal geological mapping aimed at identifying possible targetedLocal Field-based on the results of the regional geological and analysis		в	в	в	в	в	в	в	В	в	в	в	в	В	В	В
	Ground geophysical survey (Subject to the positive outcomes of i and ii above)	В	В	В	В	В	В	В	В	В	В	В	В	В	В	В	В
	Possible Trenching (Subject to the outcomes of i - iii above)	В	В	В	В	В	В	В	В	В	В	В	В	В	В	В	В
	Field-based support and logistical activities will be very limited focus on a site-specific area for a very short time (maximum five (5) days)	В	в	в	В	В	в	В	в	В	В	В	В	В	В	в	В
	Laboratory analysis of the samples collected and interpretation of the results and delineating of potential targets	А	А	А	А	А	А	А	А	А	А	А	А	А	А	А	А
	Access preparation and related logistics to support activities	Α	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A
Detailed Local	Local geochemical sampling aimed at verifying the prospectivity of the target/s delineated during the initial field-based activities	С	С	С	С	С	С	С	С	С	С	С	С	С	С	С	С
Field-Based Activities	Local geological mapping aimed at identifying possible targeted based on the results of the regional geological and analysis undertaken	С	с	с	с	с	с	с	с	С	с	с	С	с	С	С	С
	Ground geophysical survey, trenching, drilling and sampling (Subject to the positive outcomes of i and ii above).	С	С	С	С	С	С	С	С	С	С	С	С	С	С	С	С
	Detailed site-specific field-based support and logistical activities, surveys, detailed geological mapping	С	С	С	С	С	С	С	С	С	С	С	С	С	С	С	С
Prefeasibility and Feasibility Studies	Detailed drilling and bulk sampling and testing for ore reserve calculations	С	С	С	С	С	С	С	С	С	С	С	С	С	С	С	С

IMPACT PROBABII	LITY OCCURRENCE		SICAL IRONN	1ENT				BIOL	.OGIC/	AL ENV	/IRON	MENT	CUL <sup>-</sup> ARC	IOECC TURAL HAEOL IRONN	AND OGIC		
SCALE A B C D E	DESCRIPTION           Extremely unlikely (e.g. never heard of in the industry)           Unlikely (e.g. heard of in the industry but considered unlikely)           Low likelihood (egg such incidents/impacts have occurred but are uncommon)           Medium likelihood (e.g. such incidents/impacts occur several times per year within the industry)           High likelihood (e.g. such incidents/impacts occur several times per year at each location where such works are undertaken)	Water Quality	Physical infrastructure and Resources	Air Quality, Noise and Dust	Landscape Topography	Soil Quality	Climate Change Influences	Habitat	Protected Areas	Flora	Fauna	Ecosystem functions, services, use values and non-Use or passive use	Local, regional and national socioeconomic settings	Commercial Agriculture	Community Protected Areas	Tourism and Recreation	Cultural, Biological and Archaeological Resources
	Geotechnical studies for mine design	С	С	С	С	С	С	С	С	С	С	С	С	С	С	С	С
	Mine planning and designs including all supporting infrastructures (water, energy and access) and test mining activities		С	С	С	С	С	С	С	С	С	С	С	С	С	С	С
	EIA and EMP to support the ECC for mining operations	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A
	Preparation of feasibility report and application for Mining License	А	A	A	A	A	A	A	A	A	A	A	А	A	A	A	A

 Table 3.6:
 Significant impact assessment matrix for the proposed exploration activities.

		SIGNIFICAN	Г ІМРАСТ					PHY ENVIRC	SICAL INMEN	т		BIC	)LOGIC/	AL ENVI	RONMI	ENT		ND AF		CULTU LOGICA	
	Magnitude, Duration, Extent, Probability Very High (5) High (4) Medium (3) Low (2) M	RECEPTOR CH /ery High (5) High(4) Major [5/5] Major [4/5] Major [5/3] Moderate[4/3] Ioderate [5/2] Moderate[4/2] Minor [5/1] Minor [4/1]	Moderate [3/4] Moderate[3/3]	Low (2) Moderate [2 /5]	Negligible (1) Minor 1/5 Minor[1/4] None[1/3] None[1/2] None [1/1]	Water Quality	Physical infrastructure and Resources	Air Quality, Noise and Dust	Landscape Topography	Soil Quality	Climate Change Influences	Habitat	Protected Areas	Flora	Fauna	Ecosystem functions, services, use values and non-Use or passive use	Local, regional and national socioeconomic settings	Commercial Agriculture	Community Protected Areas	Tourism and Recreation	Cultural, Biological and Archaeological Resources
	heitigt Destates	(i) General evaluation o supporting infrastruct		• •		1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1
1.	Initial Desktop Exploration Activities	(ii) Purchase and analysis and radiometric geopt		nment high resolu	ution magnetics	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1
		(iii) Purchase and analysis	of existing Governn	nent aerial hyper	spectral	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1
		(iv) Data interpretation reconnaissance region				1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1
		<ul> <li>(i) Regional geological, mapping and data ana</li> </ul>	•	ographical and r	remote sensing	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1
2.	Regional       (ii)       Regional geochemical sampling aimed at identifying possible targeted based on the results of the initial exploration and regional geological, topographical and remote sensing mapping and analysis undertaken         Field-Based       Image: Comparison of the initial exploration is the initial exploration exploration exploration exploration exploration exploration explo		1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1			
	Activities	<ul> <li>(iii) Regional geological m on the results of topographical and ren</li> </ul>	the initial explora	ation and regio	onal geological,	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1
		(iv) Limited field-based su camp site lasting betw			ding exploration	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1

	SIGNIFICANT IMPACT			PHY ENVIRC	SICAL ONMEN	Г		BIC	)LOGIC/	AL ENVI	RONMI	ENT		ND AF	NOMIC, RCHAEO IRONM	LOGICA	
Magnitude, Duration, Extent, Probability Very High (5) High (4) Medium (3)	RECEPTOR CHARACTERISTICS (SENSITIVITY)         'ery High (5)       High(4)       Medium (3)       Low (2)       Negligible (1)         Major [5/5]       Major [4/5[       Moderate [3/5]       Moderate [2 /5]       Minor 1/5         Major [5/4]       Major [4/4]       Moderate [3/4]       Moderate [2/4]       Minor[1/4]         Major [5/3]       Moderate[4/3]       Moderate[3/3]       Minor[2/3]       None[1/3]         oderate [5/2]       Moderate[4/2]       Minor[3/2]       None[2/2]       None[1/2]         Minor [5/1]       Minor [4/1]       None [3/1]       None [2/1]       None [1/1]	Water Quality	Physical infrastructure and Resources	Air Quality, Noise and Dust	Landscape Topography	Soil Quality	Climate Change Influences	Habitat	Protected Areas	Flora	Fauna	Ecosystem functions, services, use values and non-Use or passive use	Local, regional and national socioeconomic settings	Commercial Agriculture	Community Protected Areas	Tourism and Recreation	Cultural, Biological and Archaeological Resources
	(v) Laboratory analysis of the samples collected and interpretation of the results and delineating of potential targets for future detailed site-specific exploration if the results are positive and supports further exploration of the delineated targets	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1
	<ul> <li>Local geochemical sampling aimed at verifying the prospectivity of the target/s delineated during regional reconnaissance field activities</li> </ul>	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1
3. Initial Local	<ul> <li>Local geological mapping aimed at identifying possible targeted based on the results of the regional geological and analysis undertaken</li> </ul>	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1
Field-Based Activities	(iii) Ground geophysical survey (Subject to the positive outcomes of i and ii above)	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2
	(iv) Possible Trenching (Subject to the outcomes of i - iii above)	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2
	<ul> <li>(v) Field-based support and logistical activities will be very limited focus on a site-specific area for a very short time (maximum five (5) days)</li> </ul>	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2
	<ul> <li>(vi) Laboratory analysis of the samples collected and interpretation of the results and delineating of potential targets</li> </ul>		1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1
	(i) Access preparation and related logistics to support activities	2\2	2\2	2\2	2\2	2\2	2\2	3/2	1/1	3/2	3/2	3/2	2\2	2\2	2\2	2\2	2\2
	<ul> <li>(ii) Local geochemical sampling aimed at verifying the prospectivity of the target/s delineated during the initial field-based activities</li> </ul>	2\2	2\2	2\2	2\2	2\2	2\2	3/2	1/1	3/2	3/2	3/2	2\2	2\2	2\2	2\2	2\2

			SIGNIFICANT	ТМРАСТ						SICAL DNMEN	т		BIC	DLOGIC	AL ENVI	IRONMI	ENT		ND AF	NOMIC, RCHAEC /IRONM	LOGIC	
	IMPACT SEVERITY Duration, Extent, Probability Very High (5) High (4) Medium (3) Low (2) Negligible (1)	Very High (5) Major [5/5] Major [5/3]	ECEPTOR CH High(4) Major [4/5] Major [4/4] Moderate[4/3] Moderate[4/2] Minor [4/1]		Low (2) Moderate [2 /5]	Negligible (1) Minor 1/5	Water Quality	Physical infrastructure and Resources	Air Quality, Noise and Dust	Landscape Topography	Soil Quality	Climate Change Influences	Habitat	Protected Areas	Flora	Fauna	Ecosystem functions, services, use values and non-Use or passive use		Commercial Agriculture	Community Protected Areas	Tourism and Recreation	Cultural, Biological and Archaeological Resources
4.	Detailed Loca Field-Based Activities			ing aimed at ident onal geological and			2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2
	Activities		l geophysical su e outcomes of i	rvey, trenching, dr i and ii above).	illing and samplir	ng (Subject to the	2\2	2\2	2\2	2\2	2\2	2\2	3/2	3/2	3/2	3/2	3/2	2\2	2\2	2\2	3\2	3\2
		.,	d site-specific f d geological ma	ield-based suppor	t and logistical a	ctivities, surveys,	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2
5.	Prefeasibility and Feasibilit		d drilling and b	ulk sampling and te	esting for ore res	erve calculations	3/3	3/3	3/3	3/3	3/3	3/3	3/3	3/3	3/3	3/3	3/3	3/3	3/3	3/3	3/3	3/3
	Studies	(iii) Geotec	hnical studies f	or mine design			2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2	2\2
				signs including all s d test mining activi		tructures (water,	3/3	3/3	3/3	3/3	3/3	3/3	3/3	3/3	3/3	3/3	3/3	3/3	3/3	3/3	3/3	3/3
		(v) EIA and	EMP to suppo	rt the ECC for mini	ng operations		1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1
		(vi) Prepara	ation of feasibil	ity report and appl	ication for Minin	g License	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1

### 3.4. Implementation of the EMP

#### 3.4.1. Roles and Responsibilities

Management of the environmental elements that may be affected by the different activities of the proposed / ongoing exploration is an important element of the proposed / ongoing exploration activities. The EMP also identifies the activity groups / environmental elements, the aspects / targets, the indicators, the schedule for implementation and who should be responsible for the management to prevent major impacts that the different exploration activities may have on the receiving environment (physical and biological environments).

#### 3.4.2. Proponent's Representative (PR) / Project Manager (PM)

The Proponent is to appoint a **Proponent's Representative (PR)** / **Project Manager (PM)** with the following responsibilities with respect to the EMP implementation:

- Act as the site project manager and implementing agent.
- Ensure that the Proponent's responsibilities are executed in compliance with the relevant legislation.
- Ensure that all the necessary environmental authorizations and permits have been obtained.
- Assist the exploration contractor/s in finding environmentally responsible solutions to challenges that may arise.
- Should the PR be of the opinion that a serious threat to, or impact on the environment may be caused by the exploration activities, he/she may stop work. the Proponent must be informed of the reasons for the stoppage as soon as possible.
- The PR has the authority to conduct disciplinary proceedings in accordance with the company policies and national legislation requirements and provisions for transgressions of basic conduct rules and/or contravention of the EMP.
- Should the Contractor or his/her employees fail to show adequate consideration for the environmental aspects related to the EMP, the PR can have person(s) and/or equipment removed from the site or work suspended until the matter is remedied.
- Maintain open and direct lines of communication between the landowners and Proponent, as well as any other identified Interested and Affected Parties (I&APs) with regards to environmental matters, and.
- Attend regular site meetings and inspections as may be required for the proposed / ongoing exploration programme.

### 3.4.3. Project Health, Safety and Environment (Project HSE)

The Proponent is to appoint a Project Health, Safety and Environment (Project HSE) with the following responsibilities with respect to the EMP implementation:

- Assist the PR in ensuring that the necessary environmental authorizations and permits have been obtained.
- Assist the PR and Contractor in finding environmentally responsible solutions to challenges that may arise.
- Conduct environmental monitoring as per EMP requirements.
- Carry out regular site inspections (on average once per week) of all exploration areas with regards to compliance with the EMP. report any non-compliance(s) to the PR as soon as possible.
- Organize for an independent internal audit on the implementation of and compliance to the EMP to be carried out half way through each field-based exploration activity. audit reports to be submitted to the PR.
- Continuously review the EMP and recommend additions and/or changes to the EMP document.
- Monitor the Contractor's environmental awareness training.
- Keep records of all activities related to environmental control and monitoring. the latter to include a photographic record of the exploration activities, rehabilitation process, and a register of all major incidents, and.
- Attend regular site meetings.

#### 3.4.4. Contractors and Subcontractors

The responsibilities of the **Contractors and Subcontractors** that may be appointed by the Proponent to undertake certain field-based activities of the proposed / ongoing exploration programme include:

- Comply with the relevant legislation and the EMP provision.
- Preparation and submission to the Proponent through the Project HSE of the following Management Plans:
  - Environmental awareness training and inductions.
  - Emergency preparedness and response.
  - Waste management, and.
  - Health and safety.
- Ensure adequate environmental awareness training for senior site personnel.
- Environmental awareness presentations (inductions) to be given to all site personnel prior to work commencement. the Project HSE is to provide the course content and the following topics, at least but not limited to, should be covered:
  - The importance of complying with the EMP provisions.

- Roles and responsibilities, including emergency preparedness.
- Basic rules of conduct (do's and don'ts).
- EMP: aspects, impacts and mitigation.
- Conduct disciplinary proceedings in accordance with the company policies and national legislation requirements and provisions for transgressions for failure to adhere to the EMP, and.
- Health and safety requirements.
- Record keeping of all environmental awareness training and induction presentations, and.
- Attend regular site meetings and environmental inspections.

## 4. EMP MITIGATION MEASURES

### 4.1. Hierarchy of Mitigation Measures Implementation

A hierarchy of methods for mitigating significant adverse effects has been adopted in order of preference and as follows:

- (i) Enhancement, e.g. provision of new habitats.
- (ii) Avoidance, e.g. sensitive design to avoid effects on ecological receptors.
- (iii) Reduction, e.g. limitation of effects on receptors through design changes, and.
- (iv) Compensation, e.g. community benefits.

### 4.2. Mitigation Measures Implementation

The Environmental Management Plan (EMP) provides a detailed plan of action required in the implementation of the mitigation measures for minimising and maximising the identified negative and positive impacts respectively.

The EMP also provides the management actions with roles and responsibilities requirements for implementation of environmental management strategies by the Proponent through the Contractors and Subcontractors who will be undertaking the exploration activities.

The EMP gives commitments including financial and human resources provisions for effective management of the likely environmental liabilities during and after the implementation of the proposed / ongoing exploration programme.

Based on the findings of the EIA, key mitigation measures as detailed in Table **4.1**: Key areas of the migration measureshave been prepared to be implemented by the Proponent with respect to the proposed / ongoing exploration programme activities and in particular for the field-based exploration activities. The following is the summary of the key areas of the migration measures provided in Tables Table **4.1**:

- 1. Project planning and implementation.
- 2. Implementation of the EMP.
- 3. Public and stakeholders relations.
- 4. Measures to enhance positive socioeconomic impacts.
- 5. Environmental awareness briefing and training.
- 6. Erection of supporting exploration infrastructure.
- 7. Use of existing access roads, tracks and general vehicle movements.
- 8. Mitigation measures for preventing flora destruction.
- 9. Mitigation measures for preventing faunal destruction.
- 10. Mitigation measures to be implemented with respect to the exploration camps and exploration sites.
- 11. Mitigation measures for surface and groundwater protection as well as general water usage.
- 12. Mitigation measures to minimise negative socioeconomic impacts.
- 13. Mitigation measures to minimise health and safety impacts.
- 14. Mitigation measures to minimise visual impacts.
- 15. Mitigation measures to minimise vibration, noise and air quality.
- 16. Mitigation measures for waste (solid and liquid) management.
- 17. Rehabilitation plan, and.
- 18. Environmental data collection.

#### Table 4.1:Key areas of the migration measures

OBJECTIVES	INDICATOR	SCHEDULE	RESPONSIBILITY
	Project planning and imp	lementation	
Establish a strong environmental awareness protocol from project implementation to final closure in order to ensure the least possible impact to the environment.	<ol> <li>Resources (Human and Financial) are provided for the Environmental Awareness and Training, Regular Safety, Health and Environment meetings and for internal and external Environmental Monitoring Costs as well as for any rehabilitation costs that may arise.</li> <li>Appointment of senior and experienced persons as Proponent's Representative (PR), Project Manager (PM) and Project HSE to assume responsibility for environmental issues.</li> <li>All individuals including sub-contractors who work on, or visit, the sites are aware of the contents of the Environmental Policy and the EMP.</li> <li>The EMP and Environmental Policy will be included in Tender Documents.</li> <li>Field visit will take place during which main access tracks will be discussed in cooperation with the land owner/s</li> </ol>	<ol> <li>Regional reconnaissance field- based mapping and sampling activities.</li> <li>Initial local field-based mapping and sampling activities.</li> <li>Detailed local field-based activities such as local geological mapping and sampling, trenching and drilling of closely spaced boreholes and bulk sampling.</li> <li>Prefeasibility and feasibility studies.</li> </ol>	<ul> <li>(i) Proponent's Representative (PR)</li> <li>(ii) Project Manager (PM)</li> <li>(iii) Project HSE</li> <li>(iv) Contractor</li> <li>Subcontractors</li> </ul>
	Implementation of the	ne EMP	
<ol> <li>Define roles and responsibilities in terms of the EMP. To make all personnel, contractors and subcontractors aware of these roles and responsibilities to ensure compliance with the EMP provisions.</li> <li>Implement environmental management that is preventative and proactive.</li> <li>Establish the resources, skills, etc. required for effective environmental management.</li> </ol>	<ol> <li>Senior staff and senior contractors are aware of, and practice the EMP requirements. These persons shall be expected to know and understand the objectives of the EMP and will, by example, encourage suitable environmentally friendly behaviour to be adopted during the exploration</li> <li>Recognition will be given to appropriate environmentally acceptable behaviour.</li> <li>Inappropriate behaviour will be corrected. An explanation to why the behaviour is unacceptable must be given, and, if necessary, the person will be disciplined. e.g. fees set out for non-compliance</li> </ol>	<ul> <li>(i) Regional reconnaissance field- based mapping and sampling activities.</li> <li>(ii) Initial local field-based mapping and sampling activities.</li> <li>(iii) Detailed local field-based activities such as local geological mapping, geochemical mapping and sampling, trenching and drilling of closely spaced boreholes and bulk sampling.</li> <li>(iv) Prefeasibility and feasibility studies.</li> </ul>	<ul> <li>(i) Proponent's Representative (PR)</li> <li>(ii) Project Manager (PM)</li> <li>(iii) Project HSE</li> <li>(iv) Contractor</li> <li>Subcontractors</li> </ul>

OBJECTIVES	INDICATOR	SCHEDULE	RESPONSIBILITY
	Public and stakeholders	s relations.	
Maintain sound relationships with the Other land users/ land owner/s and another stakeholders / public	<ol> <li>No littering or any other activity prohibited</li> <li>Permission to utilise water as well as all applicable permits are obtained.</li> </ol>	<ol> <li>Regional reconnaissance field- based mapping and sampling activities.</li> <li>Initial local field-based mapping and sampling activities.</li> <li>Detailed local field-based activities such as local geological mapping, geochemical mapping and sampling, trenching and drilling of closely spaced boreholes and bulk sampling.</li> <li>Prefeasibility and feasibility studies.</li> </ol>	<ul> <li>(i) Proponent's Representative (PR)</li> <li>(ii) Project Manager (PM)</li> <li>(iii) Project HSE</li> <li>(iv) Contractor</li> <li>Subcontractors</li> </ul>
	Measures to enhance positive soc	ioeconomic impacts.	
<ul> <li>Measures to enhance positive socioeconomic impacts in order to:</li> <li>1. Avoid exacerbating the influx of unemployed people to the area.</li> <li>2. Develop a standardised recruitment method for subcontractor and field workers.</li> </ul>	<ol> <li>Stipulate a preference for local contractors in its tender policy. Preference to local contractors should still be based on competitive business principles and salaries and payment to local service providers should still be competitive.</li> <li>Develop a database of local businesses that qualify as potential service providers and invite them to the tender process.</li> <li>Scrutinise tender proposals to ensure that minimum wages were included in the costing.</li> <li>Stipulate that local residents should be employed for temporary unskilled/skilled and where possible in permanent unskilled/skilled positions as they would reinvest in the local economy.</li> <li>Must ensure that potential employees are from the area, they need submit proof of having lived in the area for a minimum of 5 years.</li> <li>Must ensure that contractors adhere to Namibian Affirmative Action, Labour and Social Security, Health and Safety laws. This could be accomplished with a contractual requirement stipulating that monthly proof should be submitted indicating payment of minimum wages to workers, against their ID numbers,</li> </ol>	<ul> <li>(i) Regional reconnaissance field-based mapping and sampling activities.</li> <li>(ii) Initial local field-based mapping and sampling activities.</li> <li>(iii) Detailed local field-based activities such as local geological mapping, geochemical mapping and sampling, trenching and drilling of closely spaced boreholes and bulk sampling.</li> <li>(iv) Prefeasibility and feasibility studies.</li> </ul>	<ul> <li>(i) Proponent's Representative (PR)</li> <li>(ii) Project Manager (PM)</li> <li>(iii) Project HSE</li> <li>(iv) Contractor</li> <li>Subcontractors</li> </ul>

OBJECTIVES	INDICATOR	SCHEDULE	RESPONSIBILITY
	payment of social security and submission of affirmative action data. Encouraged to cater for the needs of employees to increase the spending of wages locally.		
	Environmental awareness brie	fing and training.	
	1. Every senior/supervisory member of the team shall familiarise themselves with the contents of the EMP. They shall understand their roles and responsibilities with regard to personnel and project compliance with the EMP.	<ul> <li>(i) Regional reconnaissance field- based mapping and sampling activities.</li> <li>(ii) Initial local field-based mapping and sampling activities.</li> </ul>	(i) Proponent's Representative
Implement environmental awareness briefing / training for individuals who visit, or work, on site.	2. Subject to agreement of the parties, the Environmental Coordinator will hold an Environmental Awareness Briefing meeting, which shall be attended by all contractors before the start of the mineral exploration activities.	(iii) Detailed local field-based activities such as local geological mapping, geochemical mapping and sampling, trenching and drilling of closely spaced boreholes	(PR) (ii) Project Manager (PM) (iii) Project HSE (iv) Contractor Subcontractors
	3. Briefings on the EMP and Environmental Policy shall discuss the potential dangers to the environment of the following activities: public relations, littering, off-road driving, waste management, poaching and plant theft etc. The need to preserve soil, conserve water and implement water saving measures shall be presented.	and bulk sampling. (iv) Prefeasibility and feasibility studies.	
	Individuals can be questioned on the Environmental Philosophy and EMP and can recall contents.		
	Erection of supporting explora		F
<ol> <li>Get Environmental Clearance before implementation</li> <li>Establishment of the supporting exploration infrastructure done on an area with the least disturbance to the environment and within the non-sensitive areas</li> </ol>	<ol> <li>Documented Environmental Clearance from MET.</li> <li>All on site exploration infrastructure (e.g. water tanks, sewage tanks, waste disposal) are not situated on environmental sensitive area and have disturbed as less as possible.</li> <li>No littering.</li> </ol>	<ul> <li>(i) Regional reconnaissance field- based mapping and sampling activities.</li> <li>(ii) Initial local field-based mapping and sampling activities.</li> <li>(iii) Detailed local field-based activities such as local geological mapping, geochemical mapping and sampling, trenching and drilling of closely spaced boreholes and bulk sampling.</li> </ul>	<ul> <li>(i) Proponent's Representative (PR)</li> <li>(ii) Project Manager (PM)</li> <li>(iii) Project HSE</li> <li>(iv) Contractor</li> <li>(v) Subcontractors</li> </ul>

OBJECTIVES	INDICATOR	SCHEDULE	RESPONSIBILITY
		(iv) Prefeasibility and feasibility studies.	
		studies.	
	Use of existing access roads, tracks and	general vehicle movements.	
<ol> <li>Plan a road/track network that considers the environmental sensitivity of the area and a long-term tourism potential, and which is constructed in a technically and environmentally sound manner.</li> <li>Stick to the recommended track and sensitivity management zones.</li> </ol>	<ol> <li>Avoid unnecessary affecting areas viewed as important habitat – i.e. Ephemeral River and its network of tributaries of ephemeral rivers. rocky outcrops. clumps of protected tree species.</li> <li>Make use of existing tracks/roads as much as possible throughout the area.</li> <li>Do not drive randomly throughout the area (could cause mortalities to vertebrate fauna and unique flora. accidental fires. erosion related problems, etc.).</li> <li>Avoid off-road driving at night as this increases mortality of nocturnal species.</li> <li>Implement and maintain off-road track discipline with maximum speed limits (e.g.30km/h) as this would result in fewer faunal mortalities and limit dust pollution.</li> <li>Use of "3-point-turns" rather than "U-turns".</li> <li>Where tracks have to be made to potential exploration sites off the main routes, the routes should be selected causing minimal damage to the environment – e.g. use the same tracks. cross drainage lines at right angles. avoid collateral damage (i.e. select routes that do not require the unnecessary removal of trees/shrubs, especially protected species).</li> <li>Leave vehicles on tracks and walk to point of interest, when possible. Rehabilitate all new tracks created.</li> </ol>	<ul> <li>(i) Regional reconnaissance field-based mapping and sampling activities.</li> <li>(ii) Initial local field-based mapping and sampling activities.</li> <li>(iii) Detailed local field-based activities such as local geological mapping, geochemical mapping and sampling, trenching and drilling of closely spaced boreholes and bulk sampling.</li> <li>(iv) Prefeasibility and feasibility studies.</li> </ul>	<ul> <li>(i) Proponent's Representative (PR)</li> <li>(ii) Project Manager (PM)</li> <li>(iii) Project HSE</li> <li>(iv) Contractor</li> <li>(v) Subcontractors</li> </ul>
Mitigation r	neasures for preventing flora and ecosystem 1. Limit the development and avoid rocky	destruction and promotion of co	nservation.
	outcrops throughout the entire area.		
	2. Avoid development and associated		
	infrastructure in sensitive areas – e.g. Ephemeral River, in/close to drainage lines, cliffs, boulder and rocky outcrops in the area, etc. This would minimise the negative effect on	<ul> <li>(i) Regional reconnaissance field- based mapping and sampling activities.</li> </ul>	

OBJECTIVES	INDICATOR	SCHEDULE	RESPONSIBILITY
Prevent flora and ecosystem destruction and promote conservation	<ul> <li>the local environment especially unique features serving as habitat to various species.</li> <li>Avoid placing access routes (roads and tracks) trough sensitive areas – e.g. over rocky outcrops/ridges and along drainage lines. This would minimise the effect on localised potentially sensitive habitats in the area.</li> <li>Avoid driving randomly through the area (i.e. "track discipline"), but rather stick to permanently placed roads/tracks – especially during the detailed field-based exploration phase. This would minimise the effect on localised potentially sensitive habitats in the area.</li> <li>Stick to speed limits of maximum 30km/h as this would result in less dust pollution which could affect certain flora – e.g. lichen species. Speed humps could also be used to ensure the speed limit.</li> <li>Remove unique and sensitive flora (e.g. all Aloe sp.) before commencing with the development activities and relocate to a less sensitive/disturbed site if possible.</li> <li>Prevent and discourage the collecting of firewood as dead wood has an important ecological role – especially during the development phase(s). Such collecting of firewood, especially for economic reasons, often leads to abuses – e.g. chopping down of live and/or protected tree species such as <i>Acacia erioloba</i> which is a good quality wood.</li> <li>Attempt to avoid the removal of bigger trees during the development phase(s) – especially with the development phase(s) – as this could easily cause runaway veld fires causing problems (e.g. loss of grazing and domestic stock mortalities, etc.) for the neighbouring farmers.</li> <li>Rehabilitation of the disturbed areas – i.e. initial development access route "scars" and</li> </ul>	<ul> <li>(ii) Initial local field-based mapping and sampling activities.</li> <li>(iii) Detailed local field-based activities such as local geological mapping, geochemical mapping and sampling, trenching and drilling of closely spaced boreholes and bulk sampling.</li> <li>(iv) Prefeasibility and feasibility studies.</li> </ul>	<ul> <li>(i) Proponent's Representative (PR)</li> <li>(ii) Project Manager (PM)</li> <li>(iii) Project HSE</li> <li>(iv) Contractor</li> <li>(v) Subcontractors</li> </ul>

OBJECTIVES	INDICATOR	SCHEDULE	RESPONSIBILITY
	associated tracks as well as temporary		
	accommodation sites. Preferably workers		
	should be transported in/out to the EPL area on		
	a daily basis to avoid excess damage to the		
	local environment (e.g. fires, wood collection, poaching, etc.). Such rehabilitation would not		
	only confirm the company's environmental		
	integrity, but also show true local commitment		
	to the environment.		
	11. Implement erosion control. The area(s)		
	towards and adjacent the drainage line(s) are		
	easily eroded and further development may		
	exacerbate this problem. Avoid undertaking		
	any exploration activities including supporting		
	activities such as camping within 20m of the		
	main drainage line(s) to minimise erosion		
	problems as well as preserving the riparian associated fauna.		
	12. Conduct a thorough investigation on the flora		
	associated with the proposed exploration		
	site(s).		
	13. Prevent the introduction of potentially invasive		
	alien plant species (e.g. Tecoma stans,		
	Pennisetum setaceum, etc.) for ornamental		
	purposes as part of the landscaping should		
	mining activities eventually commence. Alien		
	species often "escape" and become invasive		
	causing further ecological damage. A thorough investigation of water use and ground		
	water extraction should take place before actual		
	mining activities commence as this would affect		
	the local flora, especially the ephemeral riparian		
	vegetation, not only locally, but downstream as		
	well.		
Mitigation n	neasures for preventing faunal and ecosystem	n destruction and promotion of c	onservation
	1. Limit the development and avoid rocky		
	outcrops throughout the entire area. 2. Avoid development & associated infrastructure		
	in sensitive areas – e.g. in/close to drainage		
	lines, cliffs, boulder and rocky outcrops in the		
	area, etc. This would minimise the negative		
	effect on the local environment especially		
	,		

OBJECTIVES	INDICATOR	SCHEDULE	RESPONSIBILITY
Prevent faunal and ecosystem destruction and promote conservation	<ul> <li>INDICATOR</li> <li>unique features serving as habitat to various species.</li> <li>Avoid placing access routes (roads &amp; tracks) trough sensitive areas – e.g. over rocky outcrops/ridges and along drainage lines. This would minimise the effect on localised potentially sensitive habitats in the area.</li> <li>Avoid driving randomly through the area (i.e. "track discipline"), but rather stick to permanently placed roads/tracks – especially during the detailed field-based exploration phase. This would minimise the effect on localised potentially sensitive habitats in the area.</li> <li>Stick to speed limits of maximum 30km/h as this would result in fewer faunal road mortalities. Speed humps could also be used to ensure the speed limit.</li> <li>Remove (e.g. capture) unique fauna and sensitive fauna before commencing with the development activities and relocate to a less sensitive/disturbed site if possible.</li> <li>Prevent and discourage the setting of snares (poaching), illegal collecting of veld foods (e.g. tortoises, etc.), indiscriminate killing of perceived dangerous species (e.g. snakes, etc.) and collecting of wood as this would diminish and negatively affect the local fauna.</li> <li>Prevent and discourage fires – especially with the development of access routes – as these serve as habitat for a myriad of fauna.</li> <li>Prevent and discourage fires – especially during the development phase(s) – as this could easily cause runaway veld fires affecting the local fauna, but also causing problems (e.g. loss of grazing &amp; domestic stock mortalities, etc.) for the neighbouring farmers.</li> <li>Rehabilitation of the disturbed areas – i.e. initial development access route "scars" and associated tracks as well as temporary accommodation sites. Preferably workers</li> </ul>	<ul> <li>(i) Regional reconnaissance field-based mapping and sampling activities.</li> <li>(ii) Initial local field-based mapping and sampling activities such as local geological mapping, geochemical mapping and sampling, trenching and drilling of closely spaced boreholes and bulk sampling.</li> <li>(iv) Prefeasibility and feasibility studies.</li> </ul>	(i) Proponent's Representative (PR) (ii) Project Manager (PM) (iii) Project HSE (iv) Contractor (v) Subcontractors

OBJECTIVES	INDICATOR	SCHEDULE	RESPONSIBILITY
	should be transported in/out to the EPL area on		
	a daily basis to avoid excess damage to the		
	local environment (e.g. fires, wood collection,		
	poaching, etc.). Such rehabilitation would not		
	only confirm the company's environmental		
	integrity, but also show true local commitment		
	to the environment.		
	11. Implement erosion control. The area(s)		
	towards & adjacent the drainage line(s) are		
	easily eroded and further development may		
	exacerbate this problem. Avoid undertaking		
	exploration activities including supporting		
	activities such as camping within 20m of the		
	main drainage line(s) to minimise erosion		
	problems as well as preserving the riparian associated fauna.		
	12. Conduct a thorough investigation on the fauna		
	associated with the proposed exploration		
	site(s).		
	13. Prevent the number of domestic pets – e.g.		
	cats & dogs - accompanying the workers		
	during the field-based exploration activities as		
	cats decimate the local fauna and interbreed &		
	transmit diseases to the indigenous African		
	Wildcat found in the area. Dogs often cause		
	problems when bonding on hunting expeditions		
	thus negatively affecting the local fauna. The		
	indiscriminate and wanton killing of the local		
	fauna by such pets should be avoided at all		
	costs.		
Mitigation	neasures to be implemented with respect to t	he exploration camps and explo	ration sites
	1. Select camp sites and other temporary lay over		
	sites with care – i.e. avoid important habitats.		
	2. Use portable toilets to avoid faecal pollution		
	around camp and exploration sites.		
	3. Initiate a suitable and appropriate refuse	(i) Regional reconnaissance field-	
	removal policy as littering could result in certain	based mapping and sampling	
	animals becoming accustomed to humans and	activities.	
	associated activity and result in typical	(ii) Initial local field-based mapping	
Promotion of conservation through	problem animal scenarios – e.g. baboon, black-	and sampling activities.	
preservation of flora, fauna and	backed jackal, etc		
		L	

OBJECTIVES
ecosystem around the exploration camps and exploration sites

OBJECTIVES	INDICATOR	SCHEDULE	RESPONSIBILITY
	<ul> <li>13. Rehabilitate all areas disturbed by the exploration activities – i.e. camp sites, exploration sites, etc</li> <li>14. Implement a policy of replacing 2 tree species (preferably the same species) for every 1 protected tree species having to be removed (if necessary).</li> <li>15. Although fires are not expected to be a major issue in the general area due to the overall lack of grass cover, some years it may be necessary to consider fire prevention. Ensure that adequate firefighting equipment (e.g. fire beaters. extinguishers, etc.) is available at camp sites and clear kitchen areas to avoid accidental fires.</li> <li>16. Employ an independent environmental auditor to ensure compliance, especially of the rehabilitation of all the affected areas.</li> </ul>		
	Mitigation measures to minimise negative	ve socioeconomic impacts.	
Effective management of socioeconomic benefits of the proposed / ongoing project activities	<ol> <li>The employment of local residents and local companies should be a priority. To ensure that potential employees are from the area, they need submit proof of having lived in the area for a minimum of 5 years.</li> <li>Providing information such as the number and types of jobs available, availability of accommodation facilities and rental costs and living expenses, could make potential job seekers wary of moving to the area.</li> <li>Addressing unrealistic expectations about large numbers of jobs would be created.</li> <li>Exploration camp if required should be established in close consultation with the land owners.</li> <li>Exploration camp should consider provision of basic services.</li> <li>When the contracts an employee is terminated or not renewed, contractors should transport the employee out of the area to their hometowns within two days of their contracts coming to an end.</li> </ol>	<ul> <li>(i) Regional reconnaissance field-based mapping and sampling activities.</li> <li>(ii) Initial local field-based mapping and sampling activities.</li> <li>(iii) Detailed local field-based activities such as local geological mapping, geochemical mapping and sampling, trenching and drilling of closely spaced boreholes and bulk sampling.</li> <li>(iv) Prefeasibility and feasibility studies.</li> </ul>	<ul> <li>(i) Proponent's Representative (PR)</li> <li>(ii) Project Manager (PM)</li> <li>(iii) Project HSE</li> <li>(iv) Contractor</li> <li>(v) Subcontractors</li> </ul>

OBJECTIVES	INDICATOR	SCHEDULE	RESPONSIBILITY
	<ol> <li>Tender documents could stipulate that contractors have HIV/Aids workplace policies and programmes in place and proof of implementation should be submitted with invoicing.</li> </ol>		
	8. Develop strategies in coordination with local health officers and NGO's to protect the local communities, especially young girls.		
	<ol> <li>Contract companies could submit a code of conduct, stipulating disciplinary actions where employees are guilty of criminal activities in and around the vicinity of the EPL. Disciplinary actions should be in accordance with Namibian</li> </ol>		
	<ul> <li>legislation.</li> <li>10. Contract companies could implement a no- tolerance policy regarding the use of alcohol and workers should submit to a breathalyser test upon reporting for duty daily.</li> </ul>		
	<ol> <li>Request that the Roads Authority erect warning signs of heavy exploration vehicles on affected public roads.</li> <li>Ensure that drivers adhere to speed limits and</li> </ol>		
	<ul> <li>that speed limits are strictly enforced.</li> <li>13. Ensure that vehicles are road worthy and drivers are qualified.</li> <li>14. Train drivers in potential safety issues.</li> </ul>		
	Mitigation measures to minimise he	alth and safety impacts	
	<ol> <li>Physical hazards: Follow national and international regulatory and guidelines provisions, use of correct Personal Proactive Clothing at all times, training programme, as well as the implementation of a fall protection program in accordance with the Labour Act.</li> <li>Some of the public access management measures that may be considered in an event</li> </ol>		
Promotion of health and safe working environment in line with national Labour Laws	of vandalism occurring are: • All exploration equipment must be in good working condition and services accordingly.	<ul><li>(i) Regional reconnaissance field- based mapping and sampling activities.</li><li>(ii) Initial local field-based mapping and sampling activities.</li></ul>	(i) Proponent's Representative (PR)

OBJECTIVES	INDICATOR	SCHEDULE	RESPONSIBILITY
	<ul> <li>Control access to the exploration site through using gates on the access road(s) if required.</li> <li>The entire site, must be fenced off. the type of fencing to be used would, however, be dependent on the impact on the visual resources and/or cost. and.</li> <li>Notice or information boards relating to public safety hazards and emergency contact details to be put up at the gate(s) to the exploration area.</li> <li>There is a comprehensive First Aid Kit on site and that suitable anti-histamine for bee stings / snake bites should be available.</li> <li>Rubber gloves are used in case of an accident to reduce the risk of contracting HIV/AIDS.</li> <li>All individuals have received instructions concerning the dangers of dehydration or hyperthermia. Encourage all to drink plenty of clean water not directly from the surface water bodies.</li> <li>No person under the influence of alcohol or drugs is allowed to work on site.</li> <li>The Exploration Manager ensures compliance with the requirements of the relevant Namibian Labour, Mining and Health and Safety Regulations.</li> <li>Dangerous or protected / sensitive areas are clearly marked and access to these areas is controlled or restricted.</li> <li>Due care must be taken when driving any vehicles on any roads particularly the gravel roads (day and night).</li> <li>Persons driving a vehicle must be in possession of a valid driver's license</li> <li>Awareness on HIV/AIDS among workers is raised</li> </ul>	<ul> <li>(iii) Detailed local field-based activities such as local geological mapping, geochemical mapping and sampling, trenching and drilling of closely spaced boreholes and bulk sampling.</li> <li>(iv) Prefeasibility and feasibility studies.</li> </ul>	(ii) Project Manager (PM) (iii) Project HSE (iv) Contractor (v) Subcontractors
Mitigation measures to minimise visual impacts.			

OBJECTIVES	INDICATOR	SCHEDULE	RESPONSIBILITY
Preserve the landscape character in the development of supporting infrastructure and choice of visual screening	<ol> <li>Consider the landscape character and the visual impacts of the exploration area including camp site from all relevant viewing angles, particularly from public roads.</li> <li>Use vegetation screening where applicable. Do not cut down vegetation unnecessary around the site and use it for site screening.</li> <li>Avoid the use of very high fencing.</li> <li>Minimise access roads and no off-road that could result in land scarring is allowed.</li> <li>Minimise the presence of secondary structures: remove inoperative support structures.</li> <li>Remove all infrastructure and reclaim, or rehabilitate the project site after exploration activities are completed.</li> </ol>	<ul> <li>(i) Regional reconnaissance field-based mapping and sampling activities.</li> <li>(ii) Initial local field-based mapping and sampling activities.</li> <li>(iii) Detailed local field-based activities such as local geological mapping, geochemical mapping and sampling, trenching and drilling of closely spaced boreholes and bulk sampling.</li> <li>(iv) Prefeasibility and feasibility studies.</li> </ul>	<ul> <li>(i) Proponent's Representative (PR)</li> <li>(ii) Project Manager (PM)</li> <li>(iii) Project HSE</li> <li>(iv) Contractor</li> <li>(v) Subcontractors</li> </ul>
	Mitigation measures to minimise vibra	tion, noise and air quality.	
Promote of effective management of vehicle movement, drilling and blasting operations and use of Personal Protective Equipment (PPE) in mitigating air quality and vibrations impacts in line with national laws	<ol> <li>Limit vehicle movements and adhere to the speed of 60 km/h.</li> <li>Vehicles and all equipment must be properly serviced to minimise noise pollution.</li> <li>Use of Personal Protective Equipment (PPE) to minimise Occupational Health Safety impacts dues to noise pollution around the site.</li> <li>National or international acoustic design standards must be followed.</li> <li>Drilling and blasting operations can major sources of vibration, noise and dust and where required the following mitigation measure shall be implemented.</li> <li>Drilling and blasting operations shall only be done by a qualified person who must at all times adhere to the required blasting protocol.</li> <li>Prior warning shall be given to all persons, neighbour and visitors before the blasting takes place.</li> </ol>	<ul> <li>(i) Regional reconnaissance field- based mapping and sampling activities.</li> <li>(ii) Initial local field-based mapping and sampling activities.</li> <li>(iii) Detailed local field-based activities such as local geological mapping, geochemical mapping and sampling, trenching and drilling of closely spaced boreholes and bulk sampling.</li> <li>(iv) Prefeasibility and feasibility studies.</li> </ul>	<ul> <li>(i) Proponent's Representative (PR)</li> <li>(ii) Project Manager (PM)</li> <li>(iii) Project HSE</li> <li>(iv) Contractor</li> <li>(v) Subcontractors</li> </ul>

OBJECTIVES	INDICATOR	SCHEDULE	RESPONSIBILITY
	Careful planning and timing of the blast		
	program to minimise the size of the charge.		
	• Where practicable, use of explosive products		
	with lower detonation velocities, but noting		
	that this would require more explosives to		
	achieve the same blast result.		
	• Use of detonating caps with built-in time		
	delays, as this effectively reduces each		
	detonation into a series of small explosions.		
	• Use of a procedure ("decking the charge") which subdivides the charge in one blast hole		
	into a series of smaller explosions, with drill		
	patterns restricted to a minimum separation		
	from any other loaded hole.		
	Over-drilling the holes to ensure fracturing of		
	the rock.		
	Staggering the detonation for each blast hole		
	in order to spread the explosive's total		
	overpressure over time.		
	Matching, to the extent possible, the energy		
	needed in the "work effort" of the borehole to the		
	rock mass to minimise excess energy vented into		
	the receiving environment.	and liquid) management	
	Mitigation measures for waste (solid1. Burial of waste on anywhere within the EPL	and inquid) management.	
	area is not allowed and all generated solid		
	waste must be disposed at the at an approved		
	municipal waste disposal site.		
	2. Toilet and ablution facilities must be provided		
	on site and should not be located close to		
	Ephemeral Rivers or visible discontinuities		
	(fractures, joints or faults).	(i) Regional reconnaissance field-	
	3. Provide site information on the difference	based mapping and sampling	
Promotion of effective waste	between the two main types of waste, namely:	activities.	
(solid and liquid) management	General Waste. and	(ii) Initial local field-based mapping	
through the adoption of sound	Hazardous Waste.	and sampling activities.	
and hierarchical approach to	4. Sealed containers, bins, drums or bags for the	(iii) Detailed local field-based	(i) Proponent's Representative
waste management, which would	different types of wastes must be provided.	activities such as local	(PR)
include waste minimisation, re-	Never dispose of hazardous waste in the bins	geological mapping,	(ii) Project Manager (PM)
use, recovery, recycling,	or skips intended for general waste.	geochemical mapping and	(iii) Project HSE
treatment, and proper disposal.	5. All solid and liquid wastes generated from the	sampling, trenching and drilling	(iv) Contractor
	proposed / ongoing project activities shall be		(v) Subcontractors

OBJECTIVES	INDICATOR	SCHEDULE	RESPONSIBILITY
	<ul> <li>reduced, reused, or recycled to the maximum extent practicable.</li> <li>6. Trash may not be burned or buried, except at approved sites under controlled conditions in accordance with the municipal regulations.</li> <li>7. Never overfill any waste container, drum, bin or bag. Inform your Contractor or the Environmental Control Officer / Site Manager if the containers, drums, bins or skips are nearly full.</li> <li>8. Never litter or throwaway any waste on the site, in the field or along any road. No illegal dumping.</li> <li>9. Littering is prohibited.</li> <li>10. Latrines and French drains built &gt;100m from watercourses or pans to avoid pollution of primary and secondary aquifers.</li> <li>11. Chemical toilets or suitable waste water management system shall be provided on site and around the camp as may be required.</li> </ul>	of closely spaced boreholes and bulk sampling. (iv) Prefeasibility and feasibility studies.	
	Rehabilitation p	lan	
Contributions toward environmental preservation and sustainability through rehabilitation of disturbed areas such as exploration sites and remove all unwanted part of the fixtures and restore the sites to close an approximation of the pristine state as is technically, financially and reasonably possible.	<ol> <li>The following rehabilitation actions are practiced:         <ul> <li>Small samples are preferably removed from site to avoid additional scars in the landscape.</li> <li>Litter from the site has been taken to the appropriate disposal site.</li> <li>Debris, scrap metal, etc is removed before moving to a new site or closure of the mine.</li> <li>Water tanks are dismantled and removed if not need for after use.</li> <li>Tracks on site and the access road are rehabilitated by smoothing the 'middle mannetjie'(middle ridge between the tracks) and raking the surface.</li> </ul> </li> <li>The following should be undertaken at all disturbed areas that require further</li> </ol>	<ul> <li>(i) Regional reconnaissance field- based mapping and sampling activities.</li> <li>(ii) Initial local field-based mapping and sampling activities.</li> <li>(iii) Detailed local field-based activities such as local geological mapping, geochemical mapping and sampling, trenching and drilling of closely spaced boreholes and bulk sampling.</li> <li>(iv) Prefeasibility and feasibility studies.</li> </ul>	<ul> <li>(i) Proponent's Representative (PR)</li> <li>(ii) Project Manager (PM)</li> <li>(iii) Project HSE</li> <li>(iv) Contractor</li> <li>(v) Subcontractors</li> </ul>

OBJECTIVES	INDICATOR	SCHEDULE	RESPONSIBILITY
	<ul> <li>rehabilitation:         <ul> <li>if applicable the stockpiled subsoil to be replaced (spread) and/or the site is neatly contoured to establish effective wind supported landscape patterns.</li> <li>Replace the stored topsoil seed bank layer.</li> </ul> </li> <li>Five (5) years after rehabilitation the sites are not visible from 500 m away.</li> </ul>	ollection	
	1. Environmental Monitoring Report Compiled		
<ol> <li>Collect data that will add value to environmental monitoring and reporting to the regulators</li> <li>Collect data that will add to the general scientific and geographic knowledge of the environment in which the exploration process takes place.</li> <li>Acknowledged that the required skills and knowledge to collect all the suggested data may not be available within the mine /exploration team, however, as much data as is practical should be collected.</li> </ol>	<ul> <li>and submitted by the Environmental Coordinator to the regulators</li> <li>2. The following types of information should be gathered: <ul> <li>Fauna. What tracks or signs of animal activity have been seen? (photographs and GPS recording) What animals, birds etc were identified? Alternatively provide a description and/ or photo if unidentified.</li> <li>Unusual weather conditions, e.g. records of the prevailing wind direction and the direction from which storm events come. Was there fog or rain, frost overnight or intense heat? Preferably have a thermometer and rain gauge on site.</li> </ul> </li> </ul>	<ul> <li>(i) Regional reconnaissance field-based mapping and sampling activities.</li> <li>(ii) Initial local field-based mapping and sampling activities.</li> <li>(iii) Detailed local field-based activities such as local geological mapping, geochemical mapping and sampling, trenching and drilling of closely spaced boreholes and bulk sampling.</li> <li>(iv) Prefeasibility and feasibility studies.</li> </ul>	<ul> <li>(i) Proponent's Representative (PR)</li> <li>(ii) Project Manager (PM)</li> <li>(iii) Project HSE</li> <li>(iv) Contractor</li> <li>(v) Subcontractors</li> </ul>

## 5. REHABILITATION COMMITMENTS

### 5.1. Rehabilitation Process

The following is the summary of key rehabilitation process to be implemented by the proponent:

#### Step 1: Backfilling excavated or disturbed areas:

- Transporting all stockpiled overburden back to the excavated voids.
- Backfilling the trenches, pits and quarries using original excavated and stockpiled materials.
- If applicable, backfill the various layers of overburden in the reverse order in which they were removed, i.e. Last out should be first in as far as possible, and.
- When backfilling, bear in mind that some space must be left for the backfilling of the soil on top of the overburden.

#### Step 2: Remove all waste and unwanted materials:

- Once the drilling slimes ponds have dried sufficiently, scrape out the slimes and transporting back to an exploration excavated voids during the overburden backfilling stage.
- Allow the pollution control dam to evaporate completely, scrape all waste that has collected in the pond and dispose of these and the pond lining at a suitable site.
- Bulldoze the walls of the pollution control pond over and contour.
- Collect remaining domestic waste on site and transport to an approved municipal waste disposal site.
- Clean out the oil traps, collect the waste material in drums and transport to a suitable site for disposal, and.
- Manually remove all weedy species that are present at the site (the entire plant can easily be removed because the plants tend not to root deeply).

#### Step 3: Remove all structures:

- Remove all building materials from the exploration / test mining site and either:
  - Transporting to a new site if it is to be used or stored elsewhere. or
  - Disposing at a suitable approved municipal waste disposal site. or
  - Making them available to the farmer or local persons, or,
  - Selling at an auction.

- Remove all machinery from the site and transport to a new site where it is to be used or stored or sell at an auction.
- Remove all fences that have been constructed and either make the material available to the local persons/farmer, dispose at a suitable site or sell at an auction.
- Remove the generators from the sites from site and either transport to a new site for storage or sell it to the farmer or an Auction.
- Seal all petrol, diesel, oil and grease containers and remove from the site to a storage facility or make it available to the farmer.
- Collect all scrap metal and dispose at a suitable site or sell at an auction, and.
- Break up all concrete slabs and structures on-site and transport the fragments to a suitable site for disposal.

#### Step 4: Rehabilitate the excavated voids:

- Replace the subsoil layer by backfilling the soil on top of the overburden and contour cap the subsoil with a topsoil layer about 10cm deep, and.
- Cap the topsoil containing the seed bank with a layer of gravel by manually spreading the fragments across the surface using a rake.

#### Step 5: Rehabilitate site-specific storm-water channel:

- Remove all the site structures created.
- Dispose of the plastic/wire and use the fill material to backfill the storm-water channel.
- $\circ$  Cap with a layer of topsoil to a depth of about 10cm, and.
- Cap the topsoil containing the seedbank with a gravel layer by manually spreading the fragments across the surface using a rake.

#### Step 6: Rehabilitate all adjacent exploration / test mining sites affected:

- $\circ$  Rip the surfaces to a depth of 40 cm to 50 cm using a multi-toothed ripper and tractor.
- Cover with a layer of topsoil to a depth of about 10 cm, and.
- Cap the topsoil containing the seedbank with a layer of gravel by manually spreading the fragments across the surface using a rake.

#### Step 7: Rehabilitate all unwanted access roads created:

- Rip the road surface to a depth of at least 50 cm using a multi-toothed ripper and tractor.
- Disk the ripped surface to break up the clods.

- Cover with a layer of topsoil to a depth of about 10 cm, and.
- Cap the topsoil containing the seed bank with a gravel layer by manually spreading the fragments across the surface using a rake.

### 5.2. Monitoring of the Environmental Performance

#### 5.2.1. Rehabilitation Evaluation and Performance Monitoring

The following is the summary of key rehabilitation evaluation and performance monitoring to be implemented by the proponent:

- Monitoring: A monitoring program is instituted to ensure that the requirements of the mining site rehabilitation program are met. A rehabilitation program may be subjected to various natural or man-made forces that can hinder progress and lead to problems or failure of the rehabilitation program. Regular monitoring will ensure that these factors are identified early so they may be resolved through appropriate recommendations.
- Frequency: All rehabilitated areas should be monitored over a three (3) years period from the onset of the rehabilitation procedures. The frequency of monitoring suggested above is dependent on satisfactory performance. If, however, the requirements are not being met, the frequency of monitoring can be increased. It is suggested that the monitoring be conducted once a year around September when the grasses and forbs are flowering.
- Methods: The rehabilitated areas might be monitored by the sampling randomly located 1m<sup>2</sup> quadrates. Approximately 10 quadrates per hectare (or a minimum of 3) should be sampled per plant community. The factors that will be examined in each quadrate include:
  - Percentage basal cover.
  - Percentage aerial cover.
  - Species composition and diversity.
  - Vigor and health of plants.
  - Presence of and evidence of fauna, and.
  - Nature of the substrate.
- Controls: To enable a comparison, control plots located within the surrounding un-mining areas should also be monitored. This will give an indication of the progress of rehabilitated areas versus the natural vegetation and will set the goals, which ultimately should be achieved. By monitoring the natural vegetation annually, it will also be possible to assess the natural changes that are taking place. These findings can then be applied to the rehabilitated areas so as to account for the changes, which may have resulted from natural events. Approximately 5 to 10 quadrates of 1m<sup>2</sup> should be sampled per community type to set the controls.
- Maintenance: Maintenance requirements may include seeding (if there is poor germination of the seedbank), fertiliser applications, correcting erosion problems, removing weeds, etc.

Maintenance of the rehabilitated areas will be necessary periodically. The need for and extent of maintenance activities will be determined during the regular monitoring of the site, and.

Qualified Personnel: The rehabilitation procedures from implementation to monitoring should be overseen by qualified personnel. Any persons involved in the rehabilitation of the mining site should be trained in the techniques involved.

### 5.2.2. Overall Environmental Performance Monitoring and Reporting

The monitoring of the environmental performances for the proposed / ongoing exploration project can be divided into two (2) parts and these are:

- (i) Routine / ongoing daily monitoring activities to be undertaken by the Project HSE Officer with the support of the external specialist consultants as maybe required, and.
- (ii) Preparation of annual Environmental Monitoring Report and Environmental Closure covering all activities related to the Environmental Management Plan during exploration / prospecting stages and at the closure of the proposed / ongoing exploration to be undertaken by the Project HSE Officer with the support of the external specialist consultants as may be required.

The proponent will be required to report regularly (twice a year or as the case may be) to the Environmental Commissioner in the Ministry of Environment, Forestry, and Tourism (MEFT), the environmental performances as part of the ongoing environmental monitoring programme. An environmental monitoring programme is part of the EMP performance assessments and will need to be compiled and submitted as determined by the Environmental Commissioner. The process of undertaking appropriate monitoring as per specific topics (such as fauna and flora) and tracking performances against the objectives and documenting all environmental activities is part of internal and external auditing to be coordinated by the Project HSE Officer.

The second part of the monitoring of the EMP performance will require a report outlining all the activities related to the effectiveness of the EMP at the end of the planned mineral exploration to be undertaken by the Project HSE Officer with the support of the external specialist consultants as may be required. The objective will be to ensure that corrective actions are reviewed, and steps are taken to ensure compliance for future EIA and EMP implementation.

The report shall outline the status of the environment and any likely environmental liability after the completion of the proposed / ongoing project activities. The report shall be submitted to the Environmental Commissioner in the Ministry of Environment and Tourism and will represent the final closure and fulfillment of the conditions of the Environmental Clearance Certificate (ECC) issued by the Environmental Commissioner and the conditions of the Pro-Forma Environmental Contract signed by the Proponent, Environmental Commissioner and the Mining Commissioner.

# 6. CONCLUSION AND RECOMMENDATION

### 6.1. Conclusions

Bluestate Investment (Pty) Ltd (**the Proponent**) intends to undertake exploration activities in the Exclusive Prospecting Licence (EPL) No. 8448 covering base and rare metals, dimension stone,

industrial minerals, non-nuclear fuels minerals, precious metals and precious stones. The exploration activities to be undertaken as assessed in this environmental assessment are as follows:

- (i) Initial desktop exploration activities.
- (ii) Regional reconnaissance field-based activities.
- (iii) Initial local field-based activities including detailed mapping, sampling and drilling operations.
- (iv) Detailed local field-based activities including detailed mapping, sampling and drilling operations, and.
- (v) Prefeasibility and feasibility studies including possible test mining.

The overall severity of potential environmental impacts of the proposed / ongoing project activities on the receiving environment (physical, biological, socioeconomic environments and ecosystem functions, services, use and non-use values or passive uses) will be of low magnitude, temporally duration, localised extent and low probability of occurrence.

#### 6.2. Recommendations

Based on the findings of the EIA, it's hereby recommended that the proposed / ongoing exploration activities be issued with an Environmental Clearance Certificate (ECC). It's hereby recommended that the proposed / ongoing exploration activities be issued with an Environmental Clearance Certificate (ECC). The Proponent shall implement precautionary measures / approach to environmental management.

The Proponent shall take into consideration the following key requirements for implementing the proposed exploration programme:

- (i) Mitigation measures must be implemented as detailed in this EMP report.
- (ii) Based on the findings of the EIA, it's hereby recommended that the proposed / ongoing exploration activities be issued with an Environmental Clearance Certificate (ECC). It's hereby recommended that the proposed / ongoing exploration activities be issued with an Environmental Clearance Certificate (ECC). The Proponent shall implement precautionary measures / approach to environmental management.
- (iii) The Proponent shall negotiate Access Agreements with the land owner/s as may be applicable.
- (iv) The Proponent shall adhere to all the provisions of the EMP and conditions of the Access Agreement to be entered between the Proponent and the land owner/s in line with all applicable national regulations.
- (v) Before entering any private or protected property/ area such as a private farm, the Proponent must give advance notices and obtain permission to access the EPL area at all times, and.

(vi) Where possible, and if water is found during the detailed exploration boreholes drilling operations, the Proponent shall support other land uses in the area in terms of access to freshwater supply for both human consumption, wildlife, and agricultural support as may be requested by the local community / landowners/s. The abstraction of the groundwater resources shall include water levels monitoring, sampling, and quality testing on a bi-annual basis, and the affected landowners must have access to the results of the water monitoring analyses as part of the ongoing stakeholder disclosure requirements on shared water resources as may be applicable.

The Proponent must take all the necessary steps to implement all the recommendations of the EMP for the successful implementation and completion of the proposed / ongoing exploration programme covering the EPL 8448. Recommended actions to be implemented by the Proponent through implementations of the EMP are:

- (i) The Proponent must implement precautionary measures / approach to environmental management. Once a viable and potential economic resource have been identified, the Proponent must develop and implement a separate EIA and EMP inclusive of the specialist studies such as fauna and flora to be undertaken by specialist consultants as part of the feasibility study stage.
- (ii) Before detailed site-specific exploration activities such as extensive drilling operations and access routes are selected, the Project HSE Officer with the support of the external specialist consultants as may be required, should consider the flora, fauna and archaeological sensitivity of the area and commission a field survey in advance of any site development as may be required based on the assessment undertaken.
- (iii) The Project HSE Officer shall lead, implement, and promote environmental culture through awareness-raising of the workforce, contractors and sub-contractors in the field during the whole duration of the proposed / ongoing exploration period.
- (iv) The Proponent to provide all the necessary support including human and financial resources, for the implementation of the proposed / ongoing mitigations and effective environmental management during the planned exploration activities for the EPL 8448.
- (v) Project HSE Officer with the support of the external specialist consultants as may be required to develop a simplified environmental induction and awareness programme for all the workforce, contractors, and sub-contractors.
- (vi) Where contracted service providers are likely to cause environmental impacts, these will need to be identified and contract agreements need to be developed with costing provisions for environmental liabilities.
- (vii) Implement monitoring of the actions and management strategies developed during the mineral exploration process. Final Environmental Monitoring report shall be prepared by the Project HSE Officer with the support of the external specialist consultants as maybe required to be submitted to the regulators and to mark the closure of the proposed / ongoing mineral exploration, and.
- (viii)Develop and implement a monitoring programme that will fit into the overall company's Environmental Management Systems (EMS) as well as for any future EIA for possible mining projects.

## 6.3. Summary ToR for Test Mining and Mining Stages

In an even that economic minerals resources are discovered within the EPL 8448 area and could lead to the development of mining project, a new Environmental Clearance Certificate (ECC) for mining will be required. The ECC being supported by this EMP report only covers the exploration phase. A separate field-based and site-specific Environmental Impact Assessment (EIA) and Environmental Management Plan (EMP) reports supported by specialist studies as maybe applicable must be prepared in order to support the application for the new ECC for mining operations. The EIA and EMP studies shall form part of the prefeasibility and feasibility study with respect to the test mining or possible mining operations.

The site-specific EIA and EMP shall cover the area identified to have potential economic minerals resources as well as all areas to be used for infrastructural support areas such as pit / shaft area/s, waste rock, tailings dump, access, office blocks, water, and energy infrastructure support areas (water, energy and road / access). In addition to the Terms of Reference (ToR) to be developed during the Environmental Scoping study phase for the test mining / mining stages, the following field-based and site-specific specialist studies shall be undertaken as part of the EIA and EMP for possible test mining or mining operations in an event of a discovery of economic minerals resources and possible development of a mining project:

- (i) Groundwater studies including modeling as may be applicable.
- (ii) Field-based flora and fauna diversity.
- (iii) Archaeology.
- (iv) Noise and Sound modeling linked to engineering studies.
- (v) Socioeconomic assessment, and.
- (vi) Others as may be identified/recommended by the stakeholders/ landowners/ Environmental Commissioner or specialists.

The aims and objectives of the Environmental Assessment (EA) covering EIA and EMP to be implemented as part of the feasibility study if a variable resource is discovered are:

- (i) To assess all the likely positive and negative short- and long-term impacts on the receiving environment (physical, biological, and socioeconomic environments) at local (EPL Area), regional, national (Namibia), and Global levels using appropriate assessment guidelines, methods and techniques covering the complete project lifecycle. The EIA and EMP to be undertaken shall be performed with reasonable skill, care, and diligence in accordance with professional standards and practices existing at the date of performance of the assessment and the guidelines, methods, and techniques shall conform to the national regulatory requirements, process, and specifications in Namibia and in particular as required by the Ministry of Mines and Energy, Ministry of Environment and Tourism and Ministry of Agriculture, Water Affairs and Forestry, and.
- (ii) The development of appropriate mitigation measures that will enhance the positive impacts and reduce the likely negative influences of the negative impacts identified or anticipated. Such mitigation measures shall be contained in a detailed EMP report covering the entire project lifecycle.

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