

# Environmental Management Plan

Proposed surface exploration on EPL6162

March 2020



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PROJECT NAME	Environmental Management Plan: EPL6162
STAGE OF REPORT	Draft Environmental Management Plan
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DATE OF RELEASE	March 2020
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Environmental Management Plan:

Proposed surface exploration on EPL6162      March 2020



## DECLARATION

I hereby declare that I:

- have knowledge of and experience in conducting assessments, including knowledge of the Environmental Management Act (7 of 2007), its regulations and guidelines that have relevance to the proposed activity;
- have performed the work relating to the application in an objective manner, regardless of whether or not the views and findings were favourable to the applicant;
- have complied with the Act, and its regulations, guidelines and other applicable laws.

I also declare that there is, to my knowledge, no information in my possession that reasonably has or may have the potential of influencing –

- any decision to be taken with respect to the application in terms of the Act and its regulations; or
- the objectivity of this report, plan or document prepared in terms of the Act and its regulations.



Stephanie van Zyl

Environmental Assessment Practitioner (EAP)

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## ACRONYMS AND ABBREVIATIONS

DEA	Directorate of Environmental Affairs
EMP	Environmental Management Plan
EPL	Exclusive Prospecting License
MET	Ministry of Environment and Tourism
MME	Ministry of Mines and Energy

## APPENDIXES

Appendix 1 CV of EAP

Appendix 2 Consultation Report

# 1 INTRODUCTION

Antler Gold, on behalf of Esegjel Xamseb, the holder of EPL 6162, intends starting with surface exploration work on this licence. They aim to generate quality mineral projects in Namibia. EPL 6162 measures 105 square kilometres and is located within the Erongo region of central Namibia within the Navachab gold trend.

Enviro Dynamics has been appointed to develop an Environmental Management Plan (EMP) in line with the Environmental Management Act (2007) and its Regulations (2012) to control the impact of exploration on the environment. This includes the physical environmental and the interaction with the property and relationships with farm owners in the area.

The Regulations state that any listed activity stipulated therein requires an assessment to be done before the Directorate of Environmental Affairs (DEA) for that activity to take place. Exploration on an EPL is stipulated as a listed activity in the Regulations and is described in section 3.1 as:

*“The construction of facilities for any process or activities which requires a license, right or other form of authorisation, and the renewal of a license, right or other form of authorisation in terms of the Minerals (Prospecting and Mining Act), 1992”.*

During the assessment, potential impacts on the biophysical and social environments are identified and mitigated through the EMP. Public participation is also done mostly in the form of contacting the affected farm owners, is part of the assessment process.

This Environmental Management Plan (EMP) must be regarded as commitments, which will become part of the Environmental Contract between the prospector and the Government of the Republic of Namibia, duly represented by the Ministry of Environment and Tourism (MET) and the Ministry of Mines and Energy (MME).

The Focus of this report is to provide the necessary Environmental Impact Awareness with accompanied mitigation measures for both Exploration Phases.

The Scope of Works for this document (Table 1 below) is described as follows.

Table 1: Scope of Works of professional services rendered.

1	Receive affected farm owners (interested and affected parties) from the client.
2	Compile a draft Environmental Management Plan (This document) which will cover surface work on the EPL's.
3	Circulate the document to the affected farm owners and other stakeholders and incorporate their comments.
4	Apply to the MET for an ECC (Environmental Clearance Certificate) for surface exploration on the applicable EPLs.
5	Submit this report to the Department of Environmental Affairs (DEA) at Ministry of Environment and Tourism (MET) and follow up the issuing of an ECC.

## 2 EXPLORATION EXPLAINED

**Exploration:** is the process of sampling/collecting fragments of the earth's layers for testing of each sample's mineral composition, grade, and spatial dispersion to acquire an informed perspective of the target area's ore potential

Table 2 illustrates the categories/stages of exploration and highlights the stages which will be employed on these particular EPLs.

Table 2: The different stages of exploration

GREENFIELD STAGES		
CATEGORY	SUB-CATEGORY	DESCRIPTION
Greenfield Exploration		Greenfields exploration is conceptual, relying on the predictive power of ore genesis models to search for mineralisation in unexplored virgin ground.
Stage 1	Grassroots (non-invasive) exploration	When a geologist has a conceptual idea about where a mineral deposit might be and do, research is done to determine if the mineralization is truly there, this is referred to as grassroots exploration. Common non-invasive activities include: <ul style="list-style-type: none"> <li>airborne satellite surveys,</li> </ul>



GREENFIELD STAGES		
CATEGORY	SUB-CATEGORY	DESCRIPTION
		<ul style="list-style-type: none"> <li>• Ground based geological and geophysical prospecting and surveying; and</li> <li>• Determining drill target areas.</li> </ul>
Stage 2	Advanced grassroots exploration	Advanced exploration projects have clearly defined target/anomaly to be tested . Mineral resource data obtained via drilling, blasting, or trenching exercises over an extended period.

Exploration does not always follow a chronological pattern of activities as described in the table above. These activities can intersect and move between each other depending on operational practical necessity.

### 3 PROPOSED EXPLORATION ACTIVITIES

#### 3.1 Associated activities

Antler Gold, on behalf of Esegjel Xamseb is applying at this stage for Stage 1 (non-invasive) exploration only. More studies and environmental footwork will be required in the event that the project proceeds to Stage 2 exploration, when more invasive work will be done.

The activity will mainly focus on the farm onguati.

The activities involved for this stage of exploration are the following:

- Mapping and whole rock sampling (Samples of approximately 1 to 2kg in size).
- Desktop studies
- a Visual survey of the surface geology to determine areas of high potential in the overall project area; and
- Ground geophysics: Narrow tracks wide enough for a person to walk on will be opened on a grid pattern and cables laid down on these opened tracks. A current is then sent along these cables and an operator measures the returning signal from underground to gain geological information and possible target positions. No vehicles will be used and the methods are minimally invasive.

No destructive geophysical exploration activities will take place during this phase. The movement of personnel will be limited to small groups with a limited amount of light load vehicles with 4x4 capabilities.

### 3.2 Locality

EPL6162 is situated north of Karibib, in the Erongo mountains in the Erongo Region of Namibia (Figure 1).

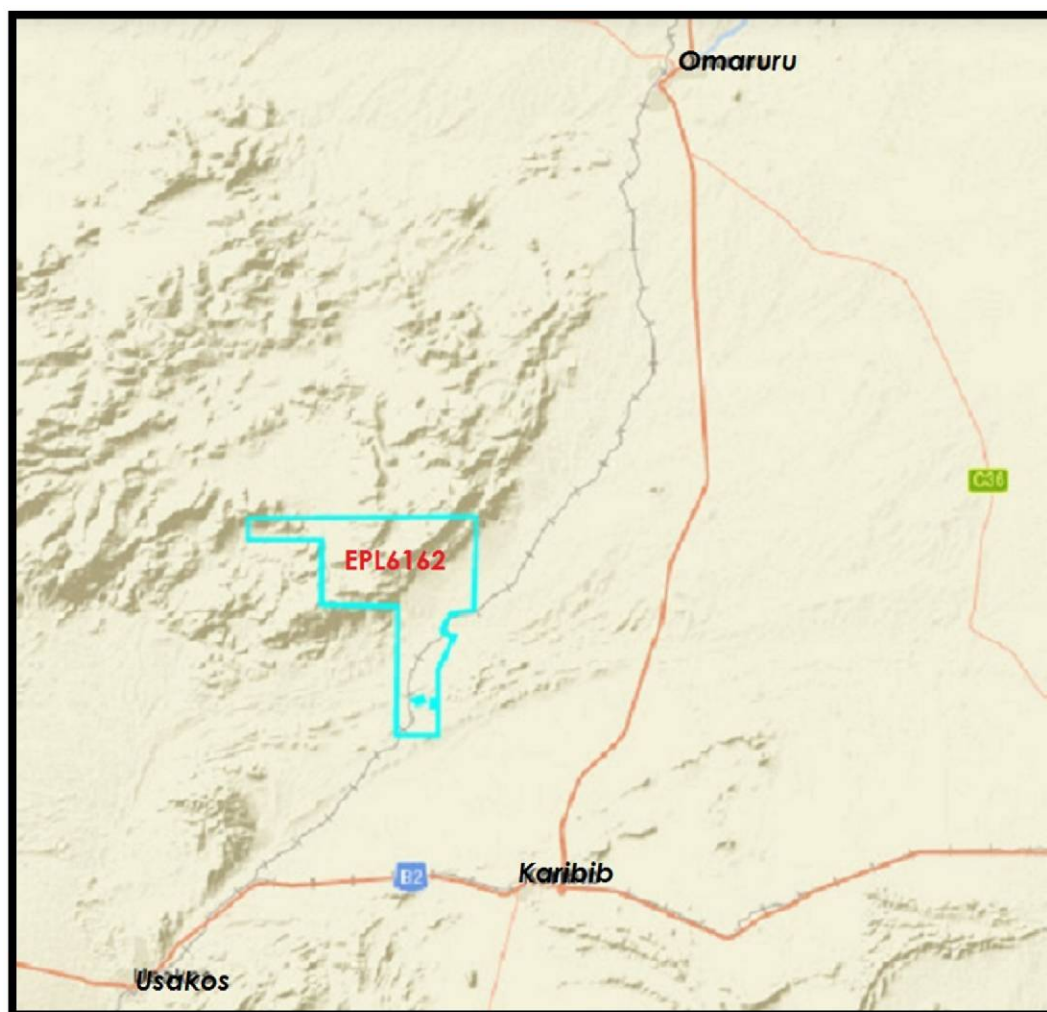


Figure 1: Locality map of EPL6162

(Source: Ministry of Mines and Energy Website Mining Cadastre Portal <http://portals.flexicadastre.com/Namibia/>).

Maps showing the farms affected for the EPL are shown in Figure 2.

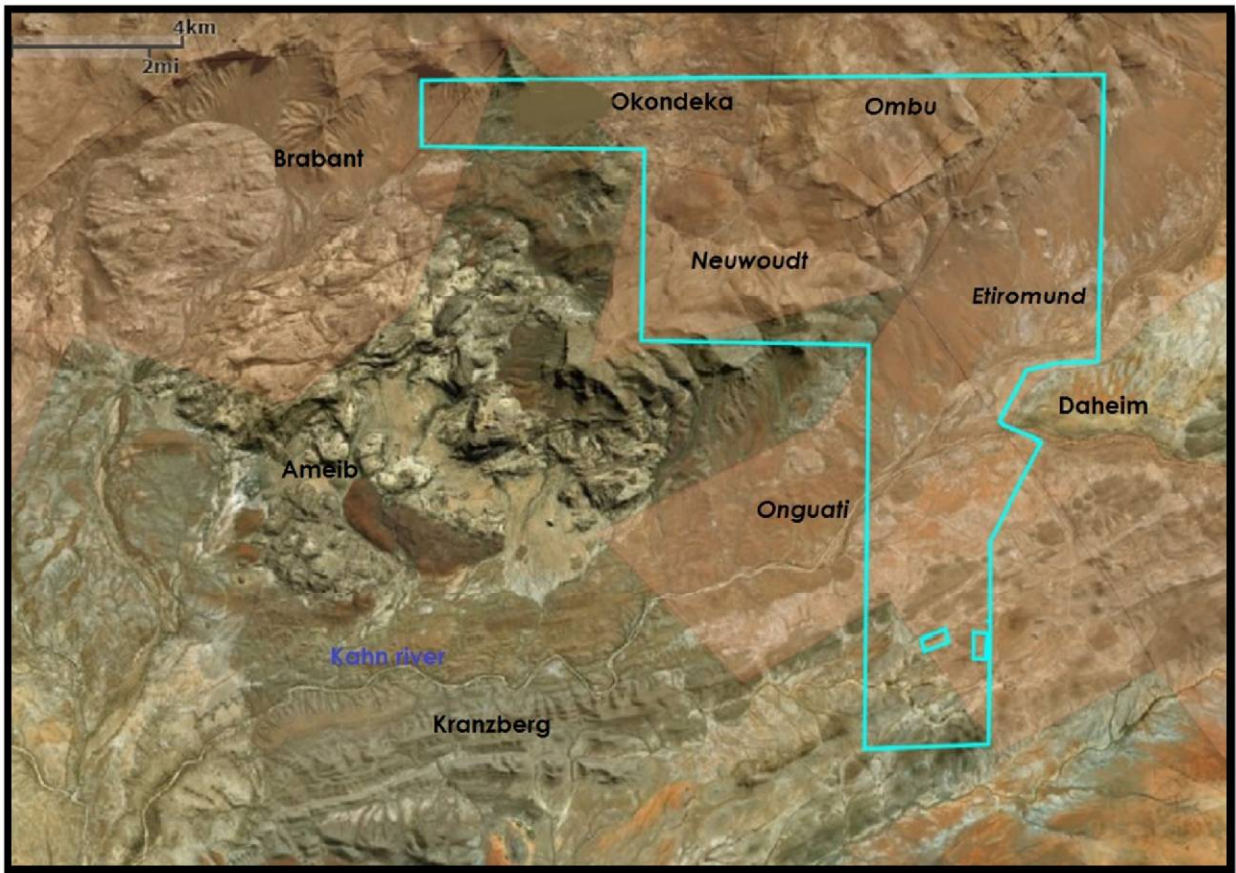


Figure 2: Locality of farms on EPLs 5974-5976

## 4 INFRASTRUCTURE AND SERVICE REQUIREMENTS

GRASSROOTS (NON-INVASIV) EXPLORATION	
Equipment needed	<ul style="list-style-type: none"> <li>• Two 4x4 vehicles;</li> <li>• Camping gear</li> </ul>
Water demand	<ul style="list-style-type: none"> <li>• Human consumption only</li> </ul>
Accommodation	<ul style="list-style-type: none"> <li>• A campsite will be erected on one of the farms, only upon agreement with the applicable farm owner. Personnel will move back and forth between the campsite and the EPLs.</li> </ul>
Proposed access route and movement	<ul style="list-style-type: none"> <li>• The C39 will be used to gain access as well as the tracks on the farms. Each farmer needs to be approached for access onto their farm.</li> </ul>

## 5 LEGAL REVIEW

This section lists the various legal instruments that have a bearing on the exploration work being considered.

Table 3: Description of the legal environment concerning the proposed exploration activities in the project area

THEME	LEGISLATION INSTRUMENT	MANAGEMENT REQUIREMENTS
The constitution of the Republic of Namibia	(Article 95 (i))	Maintenance of ecosystems, essential ecological processes and biological diversity of Namibia and utilization of living natural resources on a sustainable basis .  Application to the project: Generally to have a high view of biodiversity and the ecology during the exploration work.
Minerals (prospecting and mining) act, 1992	Act no. 33, 1992	This act enables the holder thereof to conduct reconnaissance, prospecting and mining for, and disposal of, and the exercise of control over, minerals in Namibia; and to provide for matters incidental thereto.  Application to this project: the proponent is allowed to do the following on EPL6162 as listed in the act;  To carry on prospecting operations in the prospecting area to which such licence relates in respect of such mineral or group of minerals specified in such licence;  To remove any mineral or group of minerals other than a controlled mineral or sample of such mineral or group of minerals, for any purpose other than sale or disposal, from any place where it was found or incidentally won in the course of prospecting rations referred to in paragraph (a) to any other place within Namibia; etc.

THEME	LEGISLATION INSTRUMENT	MANAGEMENT REQUIREMENTS
Environmental	<ul style="list-style-type: none"> <li>• Environmental Management Act 7 of 2007</li> <li>• EIA Regulations (2012)</li> </ul>	<p>The application for, amendment, transfer or renewal of the Environmental Clearance Certificate (EiAR s39-42). The renewal of Clearance Certificates takes place every three years after first issue.</p> <p>Contains the list of activities that may not be undertaken without an Environmental Impact Assessment: Applicable activity:</p> <p>Schedule 29, Section 3.1. Mining and Quarrying activities:</p> <p><i>"The construction of facilities for any <u>process</u> (exploration) or activities which requires a license (EPL), right or other form of authorisation...in terms of the Minerals Act (Prospecting and Mining Act), 1992."</i></p> <p>Section 21: Public Consultation Process:</p> <p>Advertisements placed in two daily national newspapers for a consecutive two week period to allow enough time for anyone to lodge their queries, opinions and suggestions about the proposed venture with the environmental consultant conducting the EIA.</p> <p>Give written notice to owners and occupiers of land adjacent to the site where the activity is or is to be undertaken or to any alternative site.</p> <p>Give notice to all authorities involved; regional councils, constituency councils and traditional authorities.</p> <p>Application to the project: It is in line with these instruments that the EIA for the proposed exploration activities was conducted.</p>
Forestry	Forest Act 12 of 2001	Protected tree species and any vegetation within 100m from a watercourse may not be removed without a permit

THEME	LEGISLATION INSTRUMENT	MANAGEMENT REQUIREMENTS
Soil Conservation	Soil conservation Act 76 of (1969)	<p>The objects of this Act are to make provision for the combating and prevention of soil erosion, and for the conservation, protection, and improvement of the soil...</p> <p>Application to this project: The proponent is duty bound to protect the environment from soil erosion by implementing "soil conservation works" as described under Section 13 of the Act. Adherence to this Act will ensure that sensible use and conservation of the soils in the area are achieved. At this non invasive stage, it involves staying on existing roads, not to remove vegetation indiscriminately, etc. See the EMP for details.</p>
Nature Conservation	<ul style="list-style-type: none"> <li>• Forestry Ordinance No. 37 of 1952 and/or the Forest Act No. 72 of 1968</li> <li>• Nature Conservation Ordinance No. 4 of 1975</li> <li>• CITES protection: Appendix I and/or 11</li> <li>• Convention on biological diversity Rio de Janeiro (1992)</li> </ul>	<p>Application to the project: To conserve and protect the natural biodiversity of the project area.</p> <p>Permits required:</p> <p>Vegetation removal not necessary. Permits not required. May be applicable in later stages, for which a new EMP with applicable licences will be prepared.</p>

THEME	LEGISLATION INSTRUMENT	MANAGEMENT REQUIREMENTS
Labour	<ul style="list-style-type: none"> <li>• Labour Act 11 of 2007</li> <li>• Health and Safety Regulations (HSR) GN 156/1997 (GG 1617).</li> </ul>	<ul style="list-style-type: none"> <li>• Procedures regarding the presence of hazardous substances on site (HSR s176-195).</li> <li>• Appoint a safety officer (HSR s6).</li> <li>• All exploration workers to participate in environmental and safety induction (HSR s2) or as instructed due to recurring incidents.</li> <li>• Adhere to minimum wage (LA s10-14).</li> <li>• Provide personal protective clothing (HSR s210-217).</li> <li>• Make provision for first aid and emergency arrangements (HSR s228-242).</li> </ul>



## 6 DESCRIPTION OF THE RECEIVING ENVIRONMENT AND ITS SENSITIVITIES

CHARACTERISTIC			
Catchment	Kahn River toward the Atlantic Ocean	River is a life blood in the semi-arid environmental to the West	Surface water and soil pollution caused by indiscriminate waste disposal, littering, spilling or dumping of effluent.
Groundwater	Moderate to low productive aquifers	Aquifers are the water supply to the commercial farmers in the area	Groundwater pollution due to waste and effluent dumping, and spilling near water courses, boreholes and anywhere on the surface which drains toward groundwater bodies.
Average annual temperatures	Above 22 ° C	Temperatures influence climate and availability of water  Influence productivity and health of workforce	
Average Max Temperatures during hottest month	32-36° C		Heatstroke/exhaustion during summer
Average Min Temperatures during coldest month	8-10 ° C		

Average annual Rainfall	200-250mm, area known to be unpredictable, changing with climate change.	Vulnerability of farming, availability of food for animals	Contribution to vulnerability of the land, use of water, increased stress on farmers.
Biome Vegetation types	Western Highlands vegetation biome.  Grassland and scattered trees on various soils,  Erongo mountain vegetation should be considered sensitive, diverse and specialised.	Vegetation likely to be hosting sensitive species.	General damage to vegetation caused by movement off the existing roads.  Damage to conservation worthy mountain vegetation caused by movement outside of existing tracks.
Land use	Commercial farms – see Figure 2.  Mostly cattle and game farming	Farm owners managing their cattle and game in camps. Currently a drought situation.	Cattle and game disrupted in camps and let out causing deteriorated relationships with farmers, inconvenience, loss of game and cattle.

The above general sensitivities have been considered in the Environmental Management Plan. Should this initial stage of exploration lead to more intensive work in the area, then the management measures will be fine tuned and extended to ensure protection of specific features.

## 7 PUBLIC PARTICIPATION

The list of farms that cover the EPL licence, has been compiled. The objective was that they will receive this Draft document as a BID for comment. The Consultation Plan (Appendix 2) include the stakeholder list and communication.

Every endeavour were made to locate and contact the farm owners such as:

- Using GIS data of Ministry of Lands and Resettlement,
- Trying to locate farm owners through neighbours,
- Trying to locate farm owners through the Namibian National Farmers Union.

Only one farm owner could be located. This is Mr. Peter Berger of farm Onguati.

It should be noted that this document does not include specific features on each farm. In the Management section, it has been stipulated that the EPL holder should contact each individual farm owner for specific rules regarding gate opening and closing, water use, possible camping and other arrangements.

The applicable authorities are also being contacted, including the Regional Council.

**No comments were received during the comments period of 9 to 16 March 2020.**

## 8 KEY IMPACTS ASSOCIATED WITH THE NON-INVASIVE EXPLORATION STAGE

The following are the key issues identified that may ensure during the non-invasive exploration stage.

- Waste dumping and littering causing water and soil pollution, aesthetic deterioration, and health risks.
- Dumping leakages and spillages of effluent, hydrocarbons and other chemicals or hazardous substances causing water and soil pollution, aesthetic deterioration, risk to the health of plants, animals and people, and aesthetic deterioration.
- Off-road driving causing harm to sensitive habitat, and animals, soil erosion, dust, and aesthetic deterioration.
- Domestic water use contributing to the scarcity of water in the area.
- Movement on the farm causing security risk, gates left unopened and resulting game and cattle lost, uncertainly and unhappiness of farm owners.
- Uncertainty among farm owners as to the movement of the exploration team, and the future of the project, caused by a lack of communication and agreements with them.

All these risks are considered to have a low significance because the scope of the work is non-invasive, with a small team and with limited equipment.

## 9 ENVIRONMENTAL MANAGEMENT REQUIREMENTS

### 9.1 Roles and Responsibilities Concerning the Implementation of the EMP

This is a small exploration team and for this purpose, the responsible person needs to be identified and he should familiarise himself fully with the stipulations in this document, and make the necessary arrangements, preparation, training, budgeting, etc. in order to fulfil these requirements.

The following are management actions that should be adhered to by the proponent at all times during this non-invasive exploration phase.

*This EMP is not adequate for further exploration phases, in which case further management actions should be considered and approved by the MET should they become necessary.*

## 9.2 Planning for Exploration

Table 4: Management requirements for the Planning and Design phase

ASPECT	MANAGEMENT REQUIREMENT
EMP Implementation	<ul style="list-style-type: none"> <li>Develop an effective strategy to accurately carry out the mitigation actions relevant to the exploration activities in this environment.</li> <li>Establish an applicable penalty system for non-compliance.</li> </ul>
Environmental Conservation	No exploration labourers should reside on site, only security personnel. Environmental conservation should be strictly applied.
Financial Provisions	Allocate appropriate budgetary allowances to developing proper exploration planning and environmental rehabilitation actions through the compulsory development of plans and strategies to mitigate negative environmental and social impacts.
Sub-contractors	Should sub-contractors be used, ensure that these stipulations are included in their contracts.
Permit Requirements	There are no further permit requirements other than the EPLs and the Environmental Clearance Certificates for this non-invasive phase.
Recruitment	Adhere to the legal provisions for the recruitment of labour (target percentages for gender balance, optimal use of local labour and SME's, etc.) in the contract.
Health and Safety	Adhere to all legal requirements as laid out in legal section above.

### 9.3 EXPLORATION MITIGATION DETAILS

#### 9.3.1 SECTION A: WASTE MANAGEMENT

ASPECT	MITIGATION MEASURE
<b>GENERIC MITIGATION DETAILS</b>	
Waste management plan	The Proponent should compile a Waste Management Plan that should address as a minimum the mitigation measures included below.
Hazardous waste	<ul style="list-style-type: none"> <li>• All exploration vehicles should be maintained regularly to prevent oil leakages. Maintenance of vehicles is not permitted to occur on site. If such is unavoidable and has to occur on site, then make sure an oil spill kit is readily available to clean up all oil spills immediately.</li> <li>• Spilled oil or fuel should be treated as hazardous waste, disposed of as it occurs in the appropriate hazardous waste containers (sealable drums) on site, and kept for disposal at a fuel station in Karibib or Omaruru.</li> </ul>
Sewage	An agreement should be reached with the farm owners regarding ablutions, should a farm be occupied for a prolonged period of time and to the satisfaction of the farm owner.
General waste	<ul style="list-style-type: none"> <li>• The exploration site should be kept tidy at all times. All domestic and general waste produced on should be contained daily.</li> <li>• No waste may be buried or burned.</li> <li>• Waste containers should be emptied regularly and the waste taken to the Karibib or Omaruru Waste Disposal Site.</li> <li>• Exploration personnel should be sensitised to dispose of waste in a responsible manner and not to litter.</li> <li>• No waste may remain on site after the completion of the project.</li> </ul>
<b>MONITORING REQUIREMENTS</b>	
<ul style="list-style-type: none"> <li>• Monitor that all staff on prudent regarding these provisions, and address any non-compliance issues as soon as they arise.</li> </ul>	

## 9.3.2 SECTION B: HEALTH AND SAFETY

ASPECT	MITIGATION MEASURE
<b>GENERIC MITIGATION MEASURES</b>	
Health and Safety Plan	The Proponent should compile a Health and Safety Plan that should address as a minimum the mitigation measures included below.
Road Safety	<ul style="list-style-type: none"> <li>• Off-road driving should not be allowed.</li> <li>• Alcohol is prohibited during the exploration project.</li> <li>• All vehicles must be road worthy.</li> <li>• Drivers should have a valid driver's license and should adhere to all traffic rules.</li> <li>• Loads upon vehicles should be properly secured to avoid items falling off the vehicle.</li> <li>• Rules of the applicable farm owners should be adhered to.</li> <li>• Look out for animals and maintain a speed limit of no more than 40km/h.</li> </ul>
Open fires	<ul style="list-style-type: none"> <li>• No wood may be collected within or near the project area.</li> <li>• Fires may only be made at the campsite at an area cleared and away from vegetation, and only if so allowed by the farm owner.</li> </ul>
Protective clothing	<ul style="list-style-type: none"> <li>• Safety boots, protective socks, long sleeves, and hats, are mandatory.</li> <li>• Sufficient drinking water should be provided.</li> </ul>
Noise	<ul style="list-style-type: none"> <li>• The team should refrain from loud music or other noisy activities which are within hearing distance from any homestead or other sensitive receptor.</li> </ul>
<b>MONITORING REQUIREMENTS</b>	
<ul style="list-style-type: none"> <li>• Constantly check staff for adherence to these measures and correct constantly as necessary.</li> <li>• Any complaints received should be addressed immediately.</li> </ul>	

## 9.3.3 SECTION C: ENVIRONMENTAL TRAINING AND AWARENESS

ASPECT	MITIGATION MEASURE
<b>GENERIC MITIGATION DETAILS</b>	
Environmental Induction (Training)	<p>All exploration personnel are to undergo environmental induction (training) for the non-invasive phase, and there should be talks held each day to correct any non-compliance or corrective issues.</p> <ul style="list-style-type: none"> <li>• Explanation of the importance of complying with all the measures in this EMP.</li> <li>• Explanation of potential bio-physical damage and make the team aware of movement on commercial farm land and the sensitivities regarding this.</li> <li>• Discussion of the potential environmental impacts of the activities.</li> <li>• Employees' roles and responsibilities, including emergency preparedness.</li> <li>• Explanation of the mitigation measures that must be implemented when particular work groups carry out their respective activities.</li> <li>• Exploration staff should be educated and informed of their environmental obligations. Meaningful penalties for damages should be stipulated. To prevent '<i>passing of the buck</i>' the main contractor should be held responsible for all unnecessary damage due to non-compliance, whether caused by his/her company or by subcontractors.</li> </ul>
<b>MONITORING REQUIREMENTS</b>	
The supervisor to ensure all are present when training is done.	



## 9.3.4 SECTION D: ENVIRONMENTAL CONSERVATION

ASPECT	MITIGATION MEASURE
GENERIC MITIGATION DETAILS	
Conservation of vegetation	<ul style="list-style-type: none"> <li>• Phase-One of the exploration programme only entail minimum movement on the EPL with the focus being put only on sampling of surface rocks.</li> <li>• Follow the track creation and management procedure below.</li> <li>• In general, any disturbance to an area should be kept to the minimum.</li> <li>• No off-road driving allowed. If exploration must be carried out on “virgin” land it must be done by foot.</li> <li>• If it is unavoidable to make a new track, then this needs to be discussed with the farm owner and an agreement reached.</li> <li>• No tracks are to be made on rock outcrops and steep slopes.</li> </ul>
Conservation of fauna (including livestock and game)	<ul style="list-style-type: none"> <li>• No one from the exploration team is allowed to kill for any purpose any head of game on any farm in and around the project area.</li> <li>• No one is permitted to remain on site after hours and on weekends, unless agreed with the owner.</li> <li>• No one should leave open or permit to leave open any access gate belonging to farm owners and risk wildlife escaping from farms. Movements of personnel are restricted to the exploration areas targeted only.</li> <li>• No hunting, trapping, setting of snares, or any other disturbance of any fauna species allowed.</li> <li>• Any poaching incidents shall be reported to the exploration manager immediately, who must lay a charge at the nearest police station against the guilty party.</li> </ul>
Water Supply	<ul style="list-style-type: none"> <li>• The proponent must negotiate the use of farm boreholes to supply water for exploration purposes and an agreement be reached between the two parties.</li> </ul>
Rehabilitation	<ul style="list-style-type: none"> <li>• During the initial prospecting phase, only limited surface rock and soil sampling will take place and it is unlikely that any scars be left by this activity.</li> <li>• All waste should be removed and taken to the Karibib or Omaruru waste disposal site.</li> <li>• Any pits dug for ablutions should be covered and done according to the arrangements with the farm owners.</li> </ul>
MONITORING REQUIREMENTS	
<ul style="list-style-type: none"> <li>• New track making is strictly prohibited.</li> <li>• If traps are identified in the project area this should be reported to the farm owner.</li> <li>• The Exploration Manager must regularly inspect the roadworthy condition of all tracks used on the EPL and record and inform all deterioration observed.</li> <li>• If any portion of a fence or a gate becomes damaged, it should be reported to the exploration manager, who then reports it to the farm owner and have it repaired.</li> </ul>	

## 9.3.5 SECTION E: EMPLOYMENT/RECRUITMENT

ASPECT	MITIGATION MEASURE
<b>GENERIC MITIGATION DETAILS</b>	
Legislation	Adhere to the legal provisions in the Labour Act (See Section 11 of the EMP) for the recruitment of labour in the Contract.
<b>MONITORING REQUIREMENTS</b>	
<ul style="list-style-type: none"> <li>Keep records of staff including wages given, non-compliance reports, leave, etc. according to legislation.</li> </ul>	

## 9.3.6 SECTION F: STAKEHOLDER COMMUNICATION

ASPECT	MITIGATION MEASURE
<b>GENERIC MITIGATION DETAILS</b>	
Communication plan	<p>The proponent should draft a Communication Plan, which should outline as a minimum the following:</p> <ul style="list-style-type: none"> <li>• Develop access agreements with all necessary farm owners to obtain written permission to enter the properties of farmers to gain access to the project area.</li> <li>• How stakeholders, who require on-going communication for the duration of the exploration period, will be identified and recorded and who will manage and update these records;</li> <li>• How these stakeholders will be consulted on an on-going basis;</li> <li>• Make provision for grievance mechanisms – i.e. how concerns can/ will be lodged/ recorded and how feedback will be delivered as well as further steps of arbitration in the event feedback is deemed unsatisfactory.</li> <li>• Each farm owner must be notified before entering his/her land, where they will be moving, period of occupation, etc.</li> <li>• All registered I&amp;APs should be notified of the completion of the overall exploration programme and the future of the project from thenceforth made clear to them.</li> </ul>
General communication matters	<ul style="list-style-type: none"> <li>• The Environmental Manager must list the stakeholders of the project and their contact details with whom on-going communication would be required for duration of the exploration contract. This list, together with the Communication Plan must be agreed upon and given to the EC before exploration commences.</li> <li>• The Environmental Manager should liaise with the proponent regarding all issues related to community consultation and negotiation as it occurs before exploration commences.</li> <li>• A procedure should be put in place to ensure that concerns raised have been followed-up and addressed.</li> <li>• All people on the stakeholders list should be informed about the availability of the complaints register in writing by the EC prior to the commencement of exploration activities.</li> </ul>
<b>MONITORING REQUIREMENTS</b>	
<ul style="list-style-type: none"> <li>• Keep constant updated records of all concerns and issues lodged by the directly affected I&amp;APs during the course of the exploration programme.</li> <li>• Monitor the speed and effectiveness of remedial actions taken upon concerns and issues raised by the public during exploration and remedy all timeously.</li> </ul>	

# Appendix 1

## Appendix 2 – Public Consultation Plan

### Strategy and results

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- No BID will be distributed. The EMP report will be used as a BID to fully inform the farmers.
  - No adverts will be placed. Farm owners will be contacted directly.
  - Relevant Authorities will be contacted.
- 

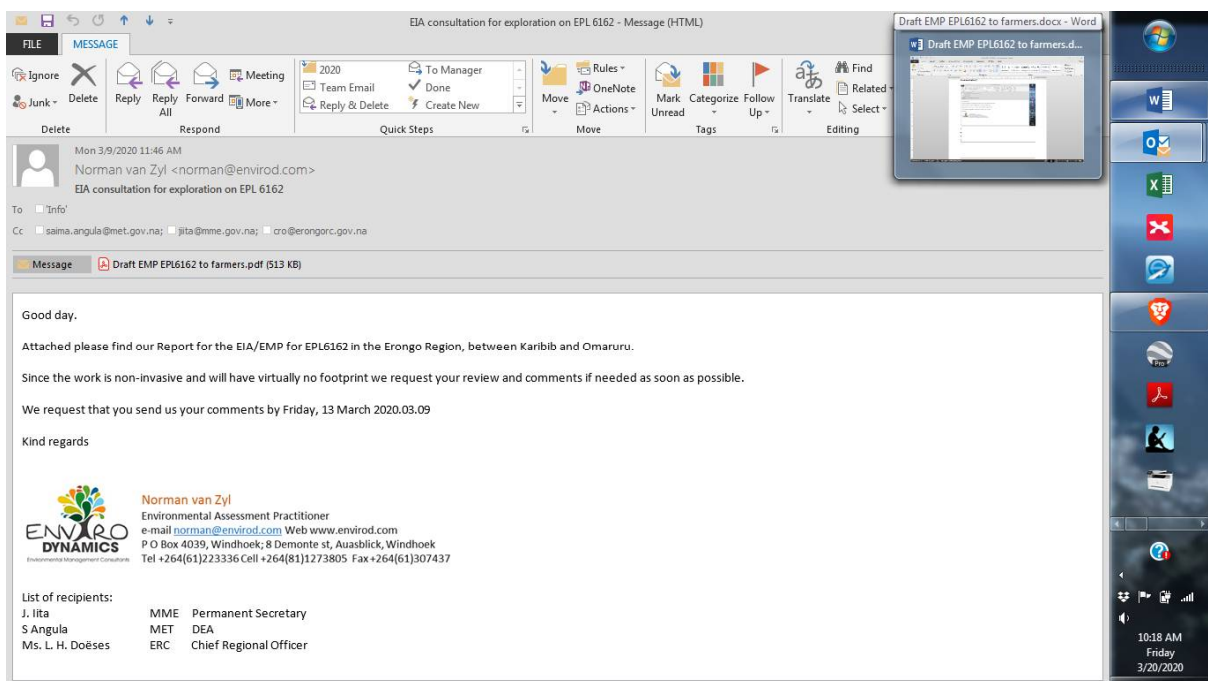
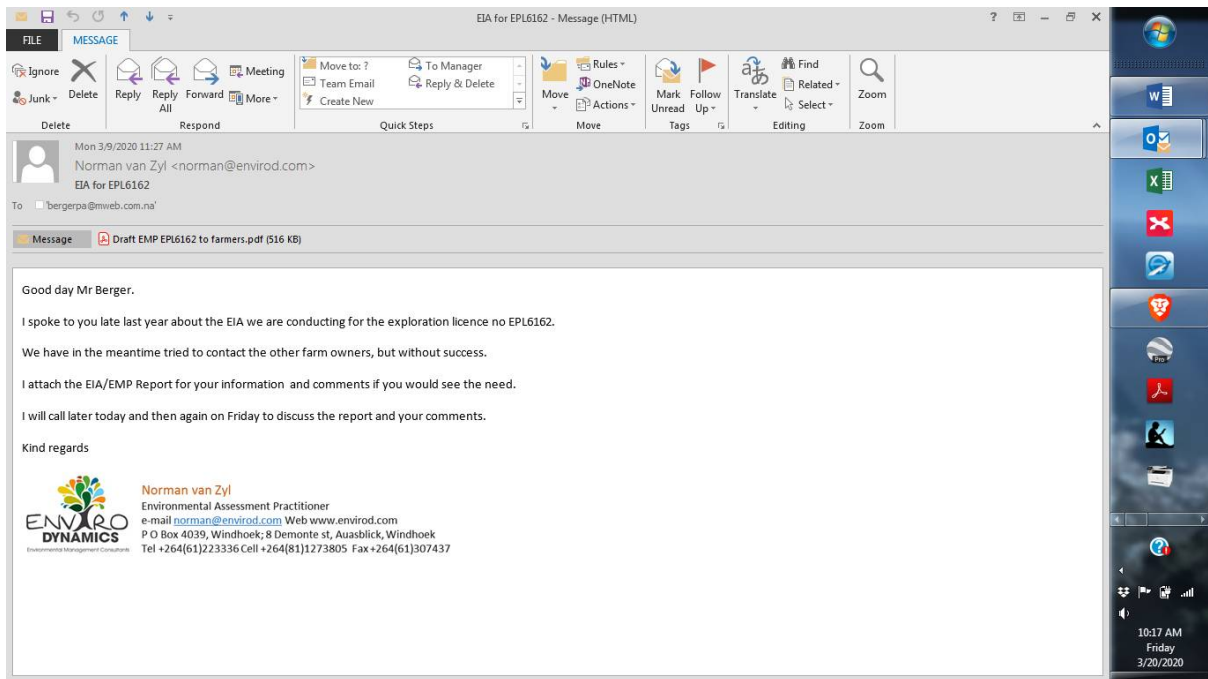
- Every endeavour were made to locate and contact the farm owners such as:
  - Using GIS data of Ministry of Lands and Resettlement,
  - Trying to locate farm owners through neighbours,
  - Trying to locate farm owners through the Namibian National Farmers Union.
  - Only one farm owner could be located. This is Mr. Peter Berger of farm Onguati.
- 

### Stakeholder list

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- |                           |              |                |  |
|---------------------------|--------------|----------------|--|
| • Peter Berger            | Farm Onguati | tel 0812413918 | <a href="mailto:bergerpa@mweb.com.na">bergerpa@mweb.com.na</a>       |
| • S Angula                | MET          |                | <a href="mailto:saima.angula@met.gov.na">saima.angula@met.gov.na</a> |
| • J lita                  | MME          |                | <a href="mailto:jiita@mme.gov.na">jiita@mme.gov.na</a>               |
| • Erongo Regional Council |              |                | <a href="mailto:cro@erongorc.gov.na">cro@erongorc.gov.na</a>         |
-

# Communication



Re: FW: Farm contact details - Message (HTML)

Wed 2/19/2020 8:01 AM  
Eddy Kully <kulwoye8@gmail.com>  
Re: FW: Farm contact details

To: Norman van Zyl

Message farms.xlsx (12 KB)

Dear Norman,

Please find the attached information.  
Unfortunately I only have farm numbers and owners names, not the contact details. For Daheim I only have the farm number. I think with the farm number you can get contact information at Ministry of Land and Reform.

No need for payments.  
Kind regards,  
Eddy

On Mon, Feb 17, 2020 at 11:18 AM Norman van Zyl <[norman@envirod.com](mailto:norman@envirod.com)> wrote:

Hi Eddy

Do you maybe have the contact details for the farms below on your database?

If so, can you please extract and invoice me for it asap?

Farm contact details - Message (HTML)

Thu 2/13/2020 12:47 PM  
Norman van Zyl <[norman@envirod.com](mailto:norman@envirod.com)>  
Farm contact details

To: info@nmfu.org.na

You forwarded this message on 2/17/2020 11:11 AM.

Good day  
My name is Norman van Zyl. I am an environmental assessment practitioner at Enviro Dynamics. We are conducting an EIA for EPL No 6162 in the Erongo region, in the Erongo mountains near Karibib.


I am trying to find the contact details of the farm owners but am not very successful at this stage.

Is it possible to check your records for contact details for the following farms?

- Farm Okondeka
- Farm Ombu
- Farm Neuwoudt
- Farm Etiromund
- Farm Brabant
- Farm Onguati
- Farm Daheim


Your assistance will be highly appreciated.

Kind regards

 Norman van Zyl  
Environmental Assessment Practitioner  
e-mail [norman@envirod.com](mailto:norman@envirod.com) Web [www.envirod.com](http://www.envirod.com)  
P O Box 4039, Windhoek; 8 Demonte st, Auasbick, Windhoek  
Tel +264(61)223336 Cell +264(81)1273805 Fax +264(61)307437

The screenshot shows an Outlook email interface. The window title is "RE: EIA consultation for exploration on EPL 6162 - Message (HTML)". The email is from Ms. Surina F. Eichas, Private Secretary of the Erongo Regional Council, dated Monday, 9 March 2020 at 12:16 PM. The subject is "RE: EIA consultation for exploration on EPL 6162". The email body contains the following text:

Good day,  
Erongo Regional Council acknowledges receipt of your information.  
Kindly be informed that it will receive the necessary attention.  
Best Regards,

 ERONGO REGIONAL COUNCIL  
**Ms. Surina F. Eichas**  
Private Secretary  
Tel: 0644105729/ +264 81 2954019  
Fax: 0644105701  
Address: Acacia Building, Tobias Haiyeko Street  
Private Bag 5019, Swakopmund, Namibia  
Website: [www.erc.gov.na](http://www.erc.gov.na)

The information contained in this e-mail is confidential and may be subject to legal privilege. If you are not the intended recipient, you must not use, copy, distribute or disclose the e-mail or any part of its contents or take any action in reliance on it. If you have received this e-mail in error, please e-mail the sender by replying to this message. The Erongo Regional Council shall not be held liable for any damages so caused to the unintended recipient and any unauthorised distribution by the unintended recipient. Any views expressed in this message are those of the individual sender, except where the sender expressly, and with authority, states them to be the views of The Erongo Regional Council.

**From:** Norman van Zyl [<mailto:norman@envirod.com>]  
**Sent:** Monday, 9 March 2020 11:46 AM  
**To:** 'Info' <[info@envirod.com](mailto:info@envirod.com)>  
**Cc:** [sama.angula@met.gov.na](mailto:sama.angula@met.gov.na); [jita@mme.gov.na](mailto:jita@mme.gov.na); [cro@erongorc.gov.na](mailto:cro@erongorc.gov.na)  
**Subject:** EIA consultation for exploration on EPL 6162