



HOANIB EXPLORATION (PTY) LTD

ENVIRONMENTAL MANAGEMENT PLAN

Prepared for: ML 57 near Outjo in the Kunene Region

April 2023

DOCUMENT CONTROL

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ACRONYMS AND ABBREVIATIONS

Below a list of acronyms and abbreviations used in this report.

Acronyms / Abbreviations	Definition
DEA	Department of Environmental Affairs
EAP	Environmental Assessment Practitioner
EAPAN	Environmental Assessment Professionals Association of Namibia
ECC	Environmental Clearance Certificate
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
EMS	Environmental Management System
MET	Ministry of Environment and Tourism

EMP FOR ML 57 NEAR OUTJO IN THE KUNENE REGION

1 INTRODUCTION

1.1 PROJECT OVERVIEW

Hoanib Exploration (Pty) Ltd (Hoanib Exploration) holds Mining Licence (ML) 57, located on the farms Hopewell and Meyerton in the Outjo District in the Kunene Region (see Figure 1). ML 57 is approximately 38 km east-northeast of Outjo and 52 km west-northwest of Otjiwarongo.

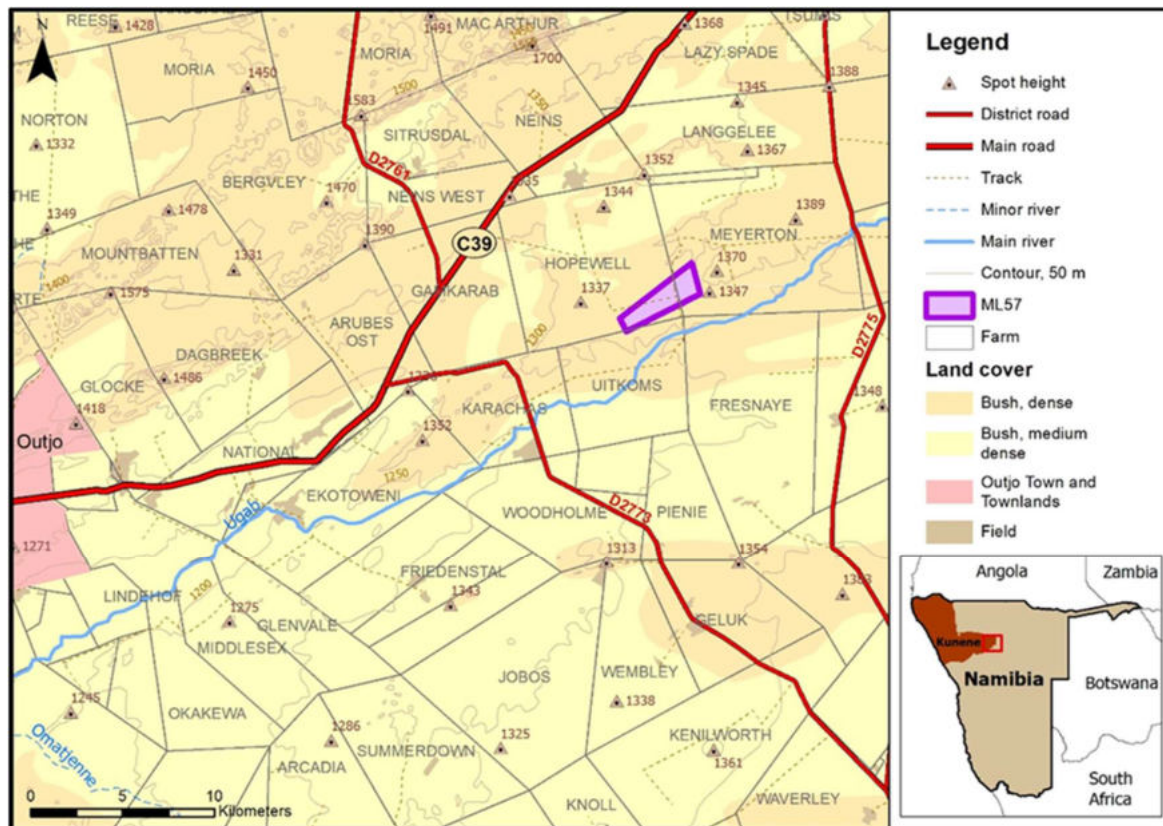


FIGURE 1: LOCATION OF ML 57 NEAR OUTJO IN THE KUNENE REGION

Since the 1980s pietersite is produced from small-scale mining operations on ML 57, but full-scale mining commenced in 2000 after a mining license was granted to Hoanib Exploration in 1999. The mine is still privately owned and in the hands of the same family who started the mine. Pietersite is considered fairly rare and is known to be mined at only two places in the world – on ML 57 near Outjo in Namibia and in the Henan Province of China.

The scale of the operations at ML 57 is directly linked to the restricted linear occurrence of the pietersite-bearing zone of pegmatite, which is confined to two parallel trends, about 170 m from each other and striking at an angle of 45 degrees. Subsequently, the “pit area” exists of a series of trenches varying in length between 24 and 250 m, depths of up to 5 m and widths of 5 - 25 m.

Loose material is searched manually for pietersite. If the subsurface bodies contain pietersite, selective small-scale blasting, about three times a week, is required to loosen the bedrock. The loose material is cleared by a front-end loader and deposited next to the open pits. Manual labour is required to hand pick the blocks of pietersite from the loose material. Waste rock is moved to dumps adjacent to the production pits or alternatively replaced into the trenches or used to establish ramps into the trenches. Some of the initial production trenches are partially filled with waste rock, as a result.

No plant processing activity is applied to extract the pietersite-containing rocks from the waste rock. Only manual processes are used and as a result, there is no chemical processing involved, no tailings are produced, and no tailings storage facility is present. Also, no water is required during the mining process.

The active mining area on ML 57 is fenced in, with warning signs. Access to ML 57 is via a farm road from the D2773 district road (see Figure 1).

At the former homestead on Farm Hopewell the following facilities are established:

- Accommodation quarters, including ablution, for the workers.
- The old farmhouse, which is occupied by the Site Manager.
- A basic workshop, sheds for storage and open storage areas, within the fenced-in former farmyard.
- An above-ground diesel storage tank (21,000 L) with a refilling facility.
- A water supply system, consisting of a borehole, solar pump, pipes and a reservoir.
- An explosives' magazine, consisting of two small storage facilities located in a dedicated fenced-in area, approximately 1,500 m from the other facilities at the old homestead.

Mobile equipment consists of a front-end loader, excavator, compressor, trucks and light vehicles and are stored / parked at a designated area at the former homestead. Basic support equipment and tools to do maintenance are also kept onsite (in the workshop, the sheds and on the open storage area).

Electricity is provided by a diesel generator and solar panels.

Permanent ablution facilities are connected to a French drain system for the handling and containment of sewage from both the workers' houses and the main farmhouse. A mobile toilet is used in the active mining area and is moved from time to time as activities shift.

Non-mineralized, not-hazardous waste is disposed of in former excavations and covered with waste rock when they are full. Only small quantities of hazardous waste onsite is possible as suppliers and service providers are contracted to take their refuse offsite.

Mining activities only occur during the daytime. Eight persons, all male, are employed at the Hopewell Mine on ML 57 while four are employed at the processing facility in Swakopmund.

Rough pietersite is transported to the company's Swakopmund facility for further sorting and beneficiation.

It is not envisaged that any additional facilities will be constructed on ML 57 in the near future. No extensive pit extension is planned in the near future as well – at most the narrow trenches will be widened by a few meters (<20 m) and excavated deeper, depending on the availability of pietersite and the manoeuvring requirements of the mobile equipment. Hopewell Mine's current and future footprint will therefore largely be restricted to the already disturbed, active mining area.

1.2 BACKGROUND ON ML 57'S ENVIRONMENTAL COMPLIANCE

The initial ML was issued by the Ministry of Mines and Energy (MME) in 1999 and was valid for fifteen years. It was issued **prior** to the Environmental Management Act, No. 7 of 2007 as well as its associated Environmental Impact Assessment (EIA) regulations (promulgated in 2012). In 2014 Hoanib Exploration applied for the renewal of its ML, which was issued by MME for another ten years (i.e. until 2024). The application for the renewal of the ML was done in tandem with an application for an Environmental Clearance Certificate (ECC), on the basis of an approved EIA Scoping (including Impact Assessment) Report, which included an Environmental Management Plan (EMP). The application for the ECC, the EIA Scoping (including Impact Assessment) Report, and the EMP (part of the main report) were done by SLR (SLR, 2014). The requested ECC was issued by the Directorate of Environmental Affairs (DEA) at the former Ministry of Environment and Tourism (MET) in 2014.

With the expiry date of the ML in 2024 in mind, Hoanib Exploration approached Namisun Environmental Projects and Development (Namisun) to assist in addressing the required renewals of its environmental legal requirements. After investigation, Namisun realized that the previously assessed and approved activities (of 2014) did not change, which means that no reassessment of the environmental impacts is necessary, neither is an amendment application

necessary. Only a renewal application for the ECC is required, to meet the conditions of Section 57 of the Environmental Management Act, No. 7 of 2007 and its associated regulations.

Namisun was appointed by Hoanib Exploration to conduct an environmental audit against the approved EMP commitments and to compose a subsequent “Environmental Performance Report”. In addition, Namisun was appointed to administer the application process for the renewal of the ECC, and to convert the existing EMP to a stand-alone document (this document).

1.3 AIM OF THIS DOCUMENT

Like the original EMP of 2014, the aim of this EMP is to detail the actions required to effectively implement management and mitigation measures required to minimise negative impacts and enhance positive impacts associated with the mining activities on ML 57. The EMP also gives the environmental commitments, which must be implemented on ML 57 by Hoanib Exploration.

Since the EMP was integrally part of the EIA Scoping (including Impact Assessment) Report before, the entire Chapter 1 was **added** to the stand-alone EMP (this document). The original EMP of 2014 provides action plans to achieve the objectives listed in tabular format. This content has been retained as Chapter 2 of the EMP (this document), only editorial changes were made in addition to minor rewordings and the inclusion / deletion of relevant text (all changes are marked in **red**). These changes have been made due to the request of Hoanib Exploration to make the EMP a stand-alone document and based on the recent review of environmental performance on ML 57.

1.4 KEEPING THE EMP UP TO DATE

It is the intention that this EMP should be seen as a “living document” which will be amended during the operation (where relevant) as new information (e.g.: environmental data), policies, authority guidelines, technologies and as the activities might change, or new ones be introduced.

Hoanib Exploration will conduct periodic reviews of the EMP, should circumstances change.

Should any listed activity(s) as defined in the EIA-regulations associated with the Environmental Management Act, No. 7 of 2007 be triggered because of future modifications / changes, this EMP will be required to be updated through another EIA process as stipulated in the Act and its regulations.

1.5 OVERALL OBJECTIVES

The following overall environmental objectives have been set for the mining activities associated with ML 57, to be implemented by Hoanib Exploration:

- Ensure compliance to this EMP and other relevant conditions or approvals and all national legislation and standards for the protection of the environment.
- Keep key stakeholders informed about Hoanib Exploration's activities, where relevant.
- Promote ongoing environmental awareness.
- Apply the precautionary principle throughout by enforcing responsibility – by supporting and training of all employees and service providers to ensure that all the employees and contractors adhere to the relevant management commitments.
- Incorporate the relevant requirements stipulated in this EMP into the designs and contracts as well as work instructions, procedures, and other relevant documents.
- Without infringing on the rights of workers, manage their movements and set rules for behaviour, with special emphasis placed on preventing transgression and punishment of transgressors.
- Pollution will be prevented through basic infrastructure design and through maintenance of equipment.
- Clean up in case of incidents, through appropriate measures.
- Ensure the legal and appropriate management and disposal of general and hazardous waste, through the implementation of a strategy for the minimisation, recycling (where possible), management, temporary storage and removal of waste.
- Develop, implement and manage monitoring systems as required to ensure good environmental performance and reporting.
- In the case of incidents, the Site Manager should be informed, and the necessary action taken (including the reporting of incidents to the implied authorities).

1.6 ROLES AND RESPONSIBILITIES

This section describes the roles and responsibilities for implementing the EMP.

1.6.1 GENERAL MANAGER

The General Manager shall ensure compliance to this EMP. Compliance with the EMP will be part of the employees' work contracts and form part of the conditions for contractors' agreements. All contractors, sub-contractors and their employees will be contractually required to comply with the relevant commitments in this EMP. The General Manager must ensure that contractors adhere to the conditions of the EMP and other relevant permits. Contract documents should consider the inclusion of penalties for non-conformance to the EMP, or to link the sign-off of the contract to a retainer clause.

It is the duty of the General Manager to ensure that appropriate environmental risk assessments are conducted and that an environmental risk management plan is developed and implemented.

The General Manager must ensure that an adequate protection and indemnity insurance cover for incidents exists, an Emergency Response Plan (including firefighting and oil spill contingency) is developed and implemented, and the necessary procedures and protocols required for emergencies are developed and implemented. The General Manager shall also ensure that sufficient financial and human resources are available to implement emergency procedures and take corrective action pro-actively when environmental risks are evident in advance.

1.6.2 SITE MANAGER

The Site Manager has overall responsibility for environmental management. To assist the Site Manager, it is recommended to appoint a dedicated person responsible for environmental management activities onsite who will be dedicated to managing and monitoring the environmental issues associated with the ongoing mining activities.

The Site Manager shall be responsible for responding to any actual environmental emergencies / incidences that occur, as specified in procedures and protocols. The Site Manager will be responsible for the following aspects related to compliance of this EMP:

- Regular inspections and auditing compliance to this EMP and any other relevant legal requirements e.g., permits and authorisations.
- Ensure that environmental awareness training is conducted during induction training and on an ad hoc basis thereafter.
- Ensure compliance to this EMP and permits and authorisations issued to Hoanib Exploration by relevant authorities.
- Submit required information to relevant authorities such as reporting on compliance with the EMP, permit and relevant authorisations.
- Develop and implement a Waste Management Strategy to ensure that waste is minimized, segregated, recycled, collected, handled and stored, removed and disposed of correctly.

1.7 MONITORING

An inspection program shall be established to check that standards and procedures as contained in the EMP are implemented and complied with.

Incidents and non-conformances shall be recorded and addressed with appropriate corrective action.

A reporting system shall be maintained to ensure that all applicable statutory requirements are met. Monitoring reports shall be submitted to the authorities, as and when required.

Reporting of incidents and non-conformances shall include details such as the reason for incidents and non-conformance, responsible persons, consequences, the corrective action taken and the necessary follow-up activities. Incidents and non-conformances shall be reported to the Site Manager and General Manager. The cause of incidents and non-conformances shall be investigated, and recommendations formulated to prevent recurrence.

Monitoring requirements include, but are not limited to:

General monitoring:

- Conduct audits and inspections. All non-compliances should be recorded and discussed at weekly site meetings and timeous remedial actions taken.
- Check for non-compliances (lack of good housekeeping, spills and leaks, incorrect storage of substances, etc.) during a general site-wide inspection weekly.
- Monitor the site daily. Record all non-compliances, grievances and transgressions and initiate corrective measures.
- Constant monitoring and record keeping of clean-ups until the tasks are completed, approved and signed off by the General Manager.

Waste Management:

- Monitor whether the provisions set out in this EMP concerning waste management is being applied as per instructions.
- Keep safe disposal certificates.

Training and awareness:

- The General Manager must request attendance registers to be completed by all personnel attending induction training sessions.

1.8 AUDITING

Auditing against the commitments in the EMP is compulsory. A distinction between internal and external audits can be made.

1.8.1 INTERNAL AUDITS

The Site Manager will conduct internal management audits. These audits will be conducted periodically. The audit findings will be documented for both record keeping purposes and for informing continual improvement.

The Site Manager will conduct weekly site-wide inspections and daily when necessary.

1.8.2 EXTERNAL AUDITS

External environmental performance assessments, or external audits, are conducted bi-annually by an independent qualified Environmental Practitioner.

1.9 DETAILS OF THE PERSONS WHO COMPOSED THIS EMP

Namisun (a Namibia-based, independent environmental consultancy firm) was appointed by Hoanib Exploration to convert the original EMP (SLR, 2014) to a stand-alone document.

Dr Pierré Smit, the author, holds a PhD in Landscape Ecology and has more than twenty-eight years of experience in environmental management, managing environmental assessment, the implementation of EMPs and Environmental Management Systems (EMSs) in Namibia.

Werner Petrick, the reviewer, has more than twenty-four years of relevant experience in conducting / managing EIAs, compiling EMPs and implementing EMPs and Environmental Management Systems (EMSs). Werner has a B. Eng (Civil) degree and a master's degree in environmental management and is certified as lead environmental assessment practitioner (EAP) and reviewer under the Environmental Assessment Professionals Association of Namibia (EAPAN).

2 MANAGEMENT AND MITIGATION PLANS

The management and mitigation measures proposed to avoid, minimise, or mitigate the potential impacts are detailed in the action plans below.

2.1 ACTION PLANS TO ACHIEVE OBJECTIVES

Activities during the site preparation and the construction phase include, but are not restricted to the following:

Action plans to achieve the objectives are listed in tabular format together, separated by activities. The action plans also include the frequency for implementing the mitigation measures as well as identifying the responsible party:

TABLE 1: ENVIRONMENTAL MANAGEMENT AND MITIGATION MEASURES

ACTIVITY	ENVIRONMENTAL ISSUE	MANAGEMENT AND MITIGATION MEASURES	ACTION PLAN	
			FREQUENCY	RESPONSIBLE PARTIES
Mine pits, waste rock dumps and associated infrastructure	Injury / fatality to animals falling/trapped in the pit	<ul style="list-style-type: none"> • Liaise with the owner of Farm Hopewell and agree on the requirements for additional fence(s) around the pit areas. • Monitoring requirement: <ul style="list-style-type: none"> ○ Visually inspect the fence around the camp on a quarterly basis. ○ Visually inspect all mine pits to ensure no animals are trapped in the pits. • Rescue all animals trapped in the pits. 	Once-off	General Manager
			Quarterly	Site Manager
			Daily	Site Manager
Ongoing mining activities	General disturbance and physical destruction of biodiversity	<ul style="list-style-type: none"> • Keep disturbance to a minimum and carefully plan extension of the pit(s). • Minimize the creation of new access tracks and using existing tracks. • Hoanib Exploration will implement a zero-tolerance policy with regards to the killing of any animals or collecting of any vegetation. Collecting of firewood will be with the farms owner's permission only. This applies to people directly employed by Hoanib Exploration as well as any family members, etc. staying on the premises associated with the mine workers. • No open fires will be permitted onsite. • Where relevant - keep topsoil separate, to be used for rehabilitation of the waste rock dumps. • Keep the flanks of the waste rock dumps at the angle of repose to enhance natural plant growth 	Once-off	General Manager
Ongoing				
Ongoing				
Ongoing				
			Prior to clearing	
			Ongoing	

ACTIVITY	ENVIRONMENTAL ISSUE	MANAGEMENT AND MITIGATION MEASURES	ACTION PLAN	
			FREQUENCY	RESPONSIBLE PARTIES
	Damage to archaeological sites	<ul style="list-style-type: none"> • Conduct an archaeological specialist study prior to extensive pit extension. • In the unlikely event that archaeological resources are discovered, a chance find emergency procedure will be implemented which includes the following: <ul style="list-style-type: none"> ○ All work at the find will be stopped to prevent damage. ○ An appropriate heritage specialist will be appointed to assess the find and related impacts. ○ Where relevant, permitting applications will be made to the necessary authorities, if required. • In the event that any graves are discovered during the mining activities, these will be avoided and preserved as a first priority. If damage is unavoidable, prior to damaging or destroying any identified graves, permission for the exhumation and relocation of graves must be obtained from the relevant descendants (if known) and the relevant local and provincial authorities. 	Once off Ongoing	General Manager Site Manager
	Noise and vibrations: Potential disturbance to neighbours / farm owner (nuisance).	<ul style="list-style-type: none"> • Restrict work to daylight hours 	Ongoing	Site Manager
	Dust: Potential disturbance to neighbours / farm owner (nuisance).	<ul style="list-style-type: none"> • Vehicle speeds will be limited to 40 km/h on access routes to limit dust. 	Ongoing	All

ACTIVITY	ENVIRONMENTAL ISSUE	MANAGEMENT AND MITIGATION MEASURES	ACTION PLAN	
			FREQUENCY	RESPONSIBLE PARTIES
Workshop	Handling and storage of hydrocarbons and potential spillages - Contamination of surface water and groundwater resources and pollution of soil.	<ul style="list-style-type: none"> • Store hazardous material in a designated area. • Bunded areas will be designed to contain 110% of the volume of one or the largest (in a multi-drum setup) tanks. Ensure that the area is bunded, i.e. no material should enter the ground • Use a drip tray to contain spillages when refilling machinery outside bunded areas. • Train staff working with hazardous material to avoid spillages. • Have emergency procedure in place, e.g. neutralising spilled hazardous material. • All refuelling and any maintenance of vehicles will take place on impermeable surfaces. • Pollution will be prevented through maintenance of equipment. • Spill kits will be readily available on site. Employees and contractors will be shown how to use the spill kits to enable containment and remediation of pollution incidents. • Any spills will be contained and cleaned up immediately. • Monitoring requirement: <ul style="list-style-type: none"> ○ Visually inspect the diesel tanks for possible leaks. 	Ongoing	Site Manager
			Daily	Site Manager
Explosives' Magazine	Storage of explosives - Safety issues	<ul style="list-style-type: none"> • Ensure that Hoanib Exploration complies with the Explosive Act, 1956 (Section 22) in regard of storage and usage of explosives. 	Ongoing	General Manager

ACTIVITY	ENVIRONMENTAL ISSUE	MANAGEMENT AND MITIGATION MEASURES	ACTION PLAN	
			FREQUENCY	RESPONSIBLE PARTIES
Waste management: General	Emissions to land, impact on biodiversity, environmental degradation and nuisance impacts	<ul style="list-style-type: none"> • Try to minimise waste. • Suitable (windproof) receptacles for waste disposal will be provided at appropriate locations on site. These receptacles will be clearly marked for different waste types (i.e. hazardous and non-hazardous). • Separate waste in designated receptacles (i.e. hazardous waste and non-hazardous waste). Non-hazardous waste to be disposed of at nearest registered landfill site or in the onsite facility and hazardous waste to be disposed of at a registered hazardous waste disposal facility. • Safe disposal certificates must be obtained and kept on record where relevant. • Only non-hazardous waste to be placed in the pit (onsite facility). • Cover the food scraps in the pit with earthen fill daily to avoid animals being attracted and scavenging from these food scraps. • Temporarily cover material that can become airborne from wind with a thin layer of earthen fill. Additional refuse may be placed on top of the thin earth fill layer and this sequence may be repeated several times. • Windblown litter must be picked up and removed from fences and vegetation on a daily basis. • When the pit has reached its capacity, the waste must be covered by soil from either the mine pits of the waste pit and compacted (minimum 1.3 m). 	Ongoing	Site Manager
			Daily	
			Ongoing	
			At closure of waste hole.	

ACTIVITY	ENVIRONMENTAL ISSUE	MANAGEMENT AND MITIGATION MEASURES	ACTION PLAN	
			FREQUENCY	RESPONSIBLE PARTIES
Waste management: Waste disposal in hole at the mining facilities	Waste being blown away from the landfill site causing emissions to land, impact on biodiversity, environmental degradation and nuisance impacts.	<ul style="list-style-type: none"> Monitoring requirement: <ul style="list-style-type: none"> Visually inspect the mining area to look out for any windblown waste (or waste not properly disposed of). 	Daily	
	Animals (wildlife) attracted to waste causing their death / injury	<ul style="list-style-type: none"> Fence the working area along its perimeter in order to control ingress by personnel and wildlife and to assist in further containment of any potential wind-borne refuse. Monitoring requirement: <ul style="list-style-type: none"> Visually inspect the fence around the waste hole on a quarterly basis. Inspect the waste hole daily for trapped animals. 	Once off Quarterly Daily	General Manager Site Manager
	Potential leachates seeping into the groundwater	<ul style="list-style-type: none"> If new pit(s) have to be opened for waste disposal, keep them in close proximity to the existing one. Compact material at the bottom of the pit or put in place a plastic liner. Alternatively, stop using the pit, cover with overburden and dispose all waste onsite: <ul style="list-style-type: none"> Place all non-hazardous waste in plastic / waste bags and store it on site in a suitable (windproof) container / skip. Once the container is full, the plastic bags (containing the waste) will be removed and transported via a 1-tonne truck to the nearest registered landfill site for disposal. 	Once off Ongoing	General Manager Site Manager

ACTIVITY	ENVIRONMENTAL ISSUE	MANAGEMENT AND MITIGATION MEASURES	ACTION PLAN	
			FREQUENCY	RESPONSIBLE PARTIES
Workers and their families	Noise, community health / safety and security (access roads), poaching, etc.	<ul style="list-style-type: none"> Honour agreements regarding site access though other (neighbouring) farms. Consult and provide feedback (as and when required) regarding activities on the individual properties. Ensure gates are closed after entry and exit. Hoanib Exploration will implement a zero-tolerance policy with regards to the killing of any animals or collecting of any vegetation. 	Ongoing	General Manager and Site Manager
General	Relevant to all	<ul style="list-style-type: none"> Provide relevant training to personnel regarding the content of this EMP. 	Ongoing	Site Manager
Mine Closure	Closure Planning	<ul style="list-style-type: none"> Develop a detailed Mine Closure Plan In broad terms the main objective is that all mining-related infrastructure and equipment are removed and what remains must be rehabilitated to resemble the pre-project state of the land as closely as possible. <ul style="list-style-type: none"> Disturbed areas other than those comprising the open pit(s) and overburden (waste rock dumps) and pre-mining structures will be returned to as close to the natural habitat as practicable (Thornbush Savannah usable for extensive farming). Open pits and overburden (waste rock dumps) will be left in a state that blends with the surrounds and will be made safe for third parties and animals. All mining-related structures, equipment and infrastructure that did not pre-exist (before mining started), will be broken and 	Ongoing	General Manager

ACTIVITY	ENVIRONMENTAL ISSUE	MANAGEMENT AND MITIGATION MEASURES	ACTION PLAN	
			FREQUENCY	RESPONSIBLE PARTIES
		<p>salvageable elements will be de-contaminated and sold. The remainder of the infrastructure will be dismantled or broken up and disposed of at a site approved by the relevant authorities. Hydrocarbon-contaminated soil underlying the structures will be excavated for disposal at a hazardous waste disposal facility or for bioremediation at a designated area on the ML after which the soil will be carted to the open pit.</p> <ul style="list-style-type: none"> ○ Residual excavations will be backfilled and levelled using selected overburden material from the waste rock dumps. ○ The ecological function of the land will be restored as far as possible by passive revegetation. ○ Socio-economic impacts (including the loss of employment) will be minimised through careful planning and preparation for closure beginning one year before closure takes place. 		

3 REFERENCES

Namisun, 2023. Environmental Performance Report for ML 57 near Outjo in the Kunene Region, Namibia. Unpublished report submitted to the authorities.

SLR, 2014. Scoping report (including assessment) for Hoanib Exploration's renewal of their mining license (ML 57). Unpublished report (SLR Project No. 734.04031.00003, Doc No. 1).