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REPORT:

EMP FOR EXPLORATION ACTIVITIES AND SMALL-SCALE MINING ON EPL 7699 ON MC 68853-68861 AND 67633 IN THE KHOMAS/HARDAP REGIONS.

PROJECT NUMBER: ECC-105-457-REP-03-D

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ABBREVIATIONS

Abbreviations	Description
ECC	Environmental Compliance Consultancy
EIA	environmental impact assessment
EMP	environmental management plan
EPL	Exclusive Prospecting Licence
ESIA	environmental and social impact assessment
GIS	geographic information systems
GPS	Global Positioning System
ha	hectares
I&APs	interested and affected parties
IECO	independent environmental control officer
IFC	International Finance Cooperation
km	kilometre
Ltd.	Limited
MC	mining claims
Mertens Mining and Trading	Mertens Mining and Trading (Pty) Ltd.
NHC	National Heritage Council
No.	number
Pty	Propriety
t/h	tonnes per hour
SWRD	stormwater return dam
TSF	tailings storage facilities
WRD	waste rock dumps

1 INTRODUCTION

1.1 PROJECT BACKGROUND

Environmental Compliance Consultancy (ECC) has been contracted by Mertens Mining and Trading (Pty) Ltd to compile an Environmental Management Plan (EMP) in accordance with the Environmental Management Act, No. 7 of 2007. The purpose of this EMP is to include the addition of mining claims 68853 and 68854 with the existing mining claims with the proposed exploration activities on Exclusive Prospecting Licence (EPL) 7699, which is located 25 km east-southeast of Rehoboth. The largest part of EPL 7699 is located within the Khomas Region, but a small portion overlaps with the Hardap Region (Figure 1).

Mertens Mining and Trading (Pty) Ltd, is a Namibian registered company (registration number 2007/0308) and holds the mineral exploration licence of EPL 7699. The project started in 2008 in phases resulting in the initial proclamation of EPL 4034, which covered an area of 34,824.80ha. Mining claims 68855 - 68861 and 67633 were proclaimed too – all of them located on the farm Mertens (No.63), which was part of EPL 4034. Bulk sampling and trenching exploration commenced, and an onsite crushing and milling plant and a pilot 10 t/h flotation plant were established to conduct trial processing and metallurgical testing. The plant is fully containerised. A small tailings facility (<1ha) in a retainer dam – a single point depository – was also established. Power is provided by a diesel generator on site and mining equipment is used for the ongoing exploration activities. Bulk diesel is kept on site, within a bunded area, in a fenced-in yard. Water is sourced from an existing borehole, which is approved and monitored. Since 2008 the project was exposed to several potential acquisitions and mergers, which is still ongoing. In 2023 Mertens Mining and Trading (Pty) Ltd requested the addition of mining claim 68853 and 68854 to the existing mining claims which is also located on the farm Mertens (No. 63). Similar exploration and small-scale mining activities will commence on the added mining claims.

The existing mining claims were converted and consolidated as part of EPL 7699, including the current operational activities at the pilot plant and the associated facilities and infrastructure. EPL 7699 includes most of the former EPL 4034, the mining claims 68855 - 68861 and 67633 on farm Mertens, and overlaps and borders several other farms. Mining claims 68853 and 68854 will be consolidated and converted as part of EPL 7699 similarly to the existing mines.

Simultaneous drilling, bulk sampling and pilot testing will be conducted to evaluate the prospect of the proposed project. Should the proposed exploration programme produce results that indicate a viable and minable resource, this could potentially lead to the extension of mining activities. For this purpose, the proponent is required to apply for a mining licence, whereby a full environmental impact assessment has to be performed.

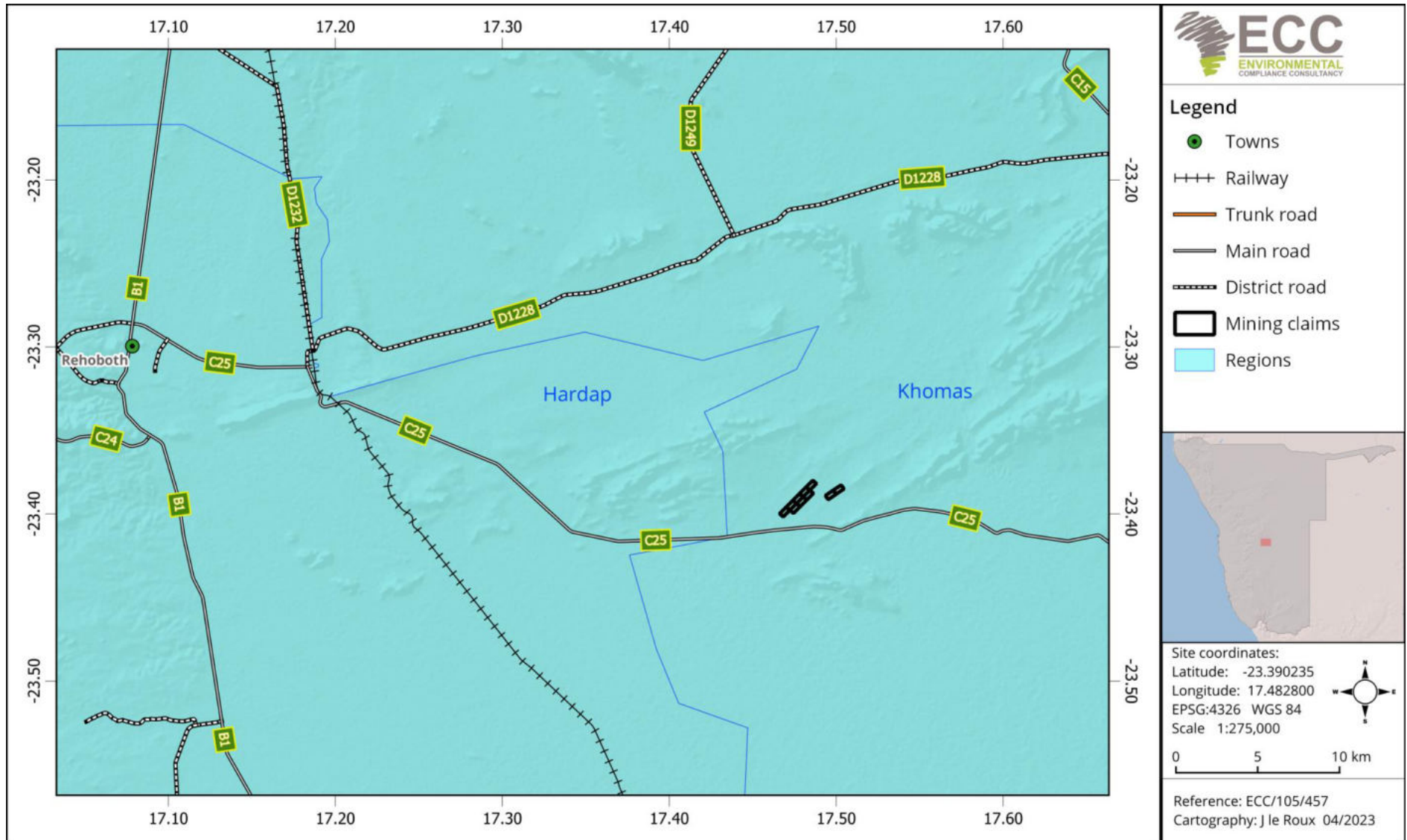


Figure 1- Location of Mining claims on EPL 7699

1.2 ENVIRONMENTAL REGULATORY REQUIREMENTS

In terms of the Environmental Impact Assessment (EIA) Regulations and the Environmental Management Act, No. 7 of 2007, the proposed project qualifies as a listed activity. Therefore, an application for an environmental clearance certificate is to be submitted. An environmental scoping report and EMP are required to be submitted as part of the application process, as well as to support the decision-making process. This report presents the EMP and has been undertaken in terms of the requirements of the act and its regulations.

1.3 PURPOSE AND SCOPE OF THIS REPORT

The purpose of this EMP is to provide a management framework for the proposed activities in EPL 7699 so that the potential environmental impacts are avoided, minimised and mitigated as far as reasonably practicable, and that statutory requirements and other legal obligations are fulfilled. This EMP also presents protocols, procedures, roles and responsibilities to ensure the management arrangements are appropriately and effectively implemented. This EMP forms an appendix to the environmental scoping report and has been based on the findings of the assessment; therefore, the environmental scoping report should be referred to for further information on the proposed project, assessment methodology, applicable legislation, and assessment findings.

This EMP is a live document and will be reviewed at predetermined intervals, and or updated when the scope of works alters, or when further data / information can be added. All personnel working on the project will be legally required to comply with the standards set out in this EMP.

The scope of this EMP includes all exploration and bulk sampling activities carried out on EPL 7699.

1.4 MANAGEMENT OF THIS EMP

The proponent, Mertens Mining and Trading (Pty) Ltd will hold the environmental clearance certificate for the proposed project and will be responsible for the implementation and management of this EMP. Prior to the exploration activities commencing, this EMP will be reviewed, amended as required and approved ready for implementation. The implementation and management of this EMP and thus the monitoring of compliance (Appendix C) will be undertaken through daily duties and activities and monthly inspections.

This EMP will be circulated to all contractors and made available on ECC's website.

1.5 LIMITATIONS, UNCERTAINTIES AND ASSUMPTIONS OF THE EMP

This EMP does not include measures for compliance with statutory occupational health and safety requirements. This will be provided in the health and safety management plan to be developed by the proponent.

Where there is any conflict between the provisions of this EMP and any contractor's obligations under their respective contracts, including statutory requirements (such as licences, project approval conditions, permits, standards, guidelines, and relevant laws), the contract and statutory requirements are to take precedence.

The information contained in this EMP has been based on the project description as provided in the environmental scoping report. Where the design or construction methods alter, this EMP may require updating and potential further assessment to be undertaken. This EMP does not address full scale mining and should full scale mining be required a detailed assessment and EMP for such would be required.

1.6 ENVIRONMENTAL CONSULTANCY

Environmental Compliance Consultancy (ECC) (Reg. No. CC 2022/0593) has prepared this EMP on behalf of the Proponent.

This report has been authored by employees of ECC, who have no material interest in the outcome of this report, nor do any of the ECC team have any interest that could be reasonably regarded as being capable of affecting their independence in the preparation of this report. ECC is independent from the Proponent and has no vested or financial interest in the Project, except for fair remuneration for professional fees rendered which are based upon agreed commercial rates. Payment of these fees is in no way contingent on the results of this report or the assessment, or a record of decision issued by Government. No member or employee of ECC is, or is intending to be, a director, officer, or any other direct employee of Mertens Mining and Trading. No member or employee of ECC has, or has had, any shareholding in Mining and Trading.

All compliance and regulatory requirements regarding this report should be forwarded by email or posted to the following address:

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2 PROJECT MANAGEMENT PERSONNEL

- This EMP provides measures, guidelines, and procedures for managing and mitigating potential environmental impacts. The EMP also indicates monitoring and reporting requirements and sets responsibilities for those carrying out management and mitigation measures. Mertens Mining and Trading (Pty) Ltd will provide a project team to oversee activities and responsibilities.

2.1 ORGANISATION STRUCTURE, ROLES, AND RESPONSIBILITIES

- The proponent will be responsible for:
 - Ensuring all members of the project team, including contractors, comply with the procedures set out in this EMP
 - Ensuring that all persons are provided with sufficient training, supervision, and instruction to fulfil this requirement, and
 - Ensuring that any person allocated specific environmental responsibilities are notified of their appointment and confirm that their responsibilities are clearly understood.
 - Contractors will be responsible for ensuring and demonstrating that all personnel employed by them are compliant with this EMP, and meet the responsibilities listed in Table 1.
- Table 1- Key roles and responsibilities

Role	Responsibility and duties
Proponent	<ul style="list-style-type: none"> - Overall responsibility for the implementation and management of this EMP - Ensure the environmental policy is communicated to all personnel throughout the proposed project and ensure that employees, contractors and visitors understand and adhere to the EMP - Responsible for providing the required resources (including financial and technical) to complete the required tasks - Appoint a project manager and a site manager (or nominated supervisor), and - Ensure that all employees, contractors and visitors are inducted on safety measures.
Project Manager	<ul style="list-style-type: none"> - Responsible for ensuring compliance with this EMP including overseeing all day-to-day activities during the duration of the project, including routine and non-routine maintenance works, as well as the decommissioning of the project - Ensure adequate resources are made available for implementation of this EMP

Role	Responsibility and duties
	<ul style="list-style-type: none"> - Responsible for the management, maintenance and revisions of this EMP - Ensure all personnel are aware of the commitments made in this EMP and any other relevant regulatory requirements applicable to the project - Ensure all employees and contractors participate in a site induction process prior to commencing work on the project - Maintain the community issues and concern register, and keep records of complaints (Appendix D) - Ensure that best environmental practice is undertaken throughout the duration of the project, and - Report any non-compliance or accidents to the regulatory authority.
Site Manager (or nominated supervisor)	<ul style="list-style-type: none"> - Ensure that all employees, contractors and visitors to the site are conversant with the requirements of this EMP, relevant to their roles on site and adhere to this EMP at all times - Provide environmental awareness / management training and site inductions for all employees, contractors and visitors - Monitor daily operations and ensure adherence by personnel to the EMP - Receive, respond to and record complaints, and - Report any non-compliance or accidents to the project manager.
Employees (and contractors and visitors where applicable)	<ul style="list-style-type: none"> - Responsible for being compliant with this EMP throughout the project - Adhere to this EMP at all times - Ensure attendance of site inductions - Ensure appropriate briefings for certain activities have been provided and are fully understood, and - Report any operations and conditions that deviate from the EMP or any non-compliant issues or accidents to the site manager and project manager.

2.2 EMPLOYMENT

The proponent (and all contractors) will comply with the requirements of the Regulations for Labour, Health and Safety, and any amendments to these regulations. The following will be complied with:

- In liaison with the relevant authorities, the proponent will ensure that local people have access to information about job opportunities and are considered first for contract employment positions

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- The number of job opportunities will be made known together with the associated skills and qualifications
 - The maximum length of time the job is likely to last for will be clearly indicated
 - Foreign workers with no proof of permanent legal residence will not be hired, and
 - Every effort will be made to recruit from the pool of unemployed workers living in the local area.

2.3 REGISTER OF ENVIRONMENTAL ASPECTS AND IMPACTS

An environmental review of the proposed Project has been completed to identify all the commitments and agreements made. A list of environmental commitments and impacts has been produced, which details deliverables including measures identified for the prevention of pollution or damage to the environment during the construction phase.

Table 2 provides a list of environmental aspects and impacts, as well as associated mitigation (as derived from the previous ESIA's) and monitoring measures, and the roles responsible for compliance. Each monitoring plan and programme are further explained in detail further in this document. They will be subject to regular review by the Environmental manager and updated when necessary.

The independent environmental control officer (IECO) will use this register to undertake regular inspections to ensure the Project is compliant with this EMP.

Table 2 - Environmental aspects, impacts, mitigation and monitoring requirements

Receptors	Potential impacts	Management / mitigation measures	Monitoring requirements	Responsibility
Access and site preparation	<ul style="list-style-type: none"> - Limiting access to the farms, - Disruption of farm operations (leaving gates open, loss of farming area, interference at feeding areas and water points) - Potential conflict with farm owners and neighbours (suspicious movement, poaching, stock theft, field fires, etc.) 	<ul style="list-style-type: none"> - Ensure documented permission to enter farms, - Farmers should have access to all farm areas at all times, - Residents will be provided at least two weeks' notice of exploration operations within 1 km of their property - Ensure appropriate supervision of all activities, - Existing water points and feeding area need to be left, unaffected, - Raise awareness and sensitise employees about contentious issues such as stock theft and poaching - Use existing roads for access to avoid new tracks, - Restrict movements to areas of activities only, - Restrict vehicle and equipment movements to daytime hours, - Make workers aware and notify them on avoiding some areas, - No driving off designated access routes / off-road driving, - No animals or birds may be collected, caught, consumed or removed from site, - Compliance with all applicable laws and agreement, - Develop and implement an operations manual or procedures to work on private farms and implement monitoring programmes thereafter, 	Daily visual observations during activity	Project manager and or site manager (or nominated site supervisor)

Receptors	Potential impacts	Management / mitigation measures	Monitoring requirements	Responsibility
		<ul style="list-style-type: none"> - Accidents and incidents need to be reported to project manager and recorded in incident register - Continuous engagement with residents and I&APs to identify any concerns or issues, and mitigation and management measures agreed upon 		
	Potential damage to cultural heritage sites	<ul style="list-style-type: none"> - Implement a Chance Find Procedure - Raise awareness about possible heritage finds - Report all finds that could be of heritage importance - In case archaeological remains to be uncovered, cease activities and the project manager has to assess and demarcate the area - Project manager to visit the site and determine whether work can proceed without damage to findings, mark exclusions boundary and inform ECC with GPS position - If needed, further investigation have to be requested for a professional assessment and the necessary protocols of the Chance Find Procedure have to be followed, - Archaeologist will evaluate the significance of the remains and identify appropriate action, for example, record and remove; relocate or leave premises (depending on the nature and value of the remains), - Inform the police if the remains are human, - Obtain appropriate clearance or approval from the competent authority, if required, and recover and 	Monthly	

Receptors	Potential impacts	Management / mitigation measures	Monitoring requirements	Responsibility
		remove the remains to the National Museum or National Forensic Laboratory as directed.		
General exploration activities	<ul style="list-style-type: none"> - Potential grievances and complaints, - Social discomfort and anxiety 	<ul style="list-style-type: none"> - Develop and implement an operations manual or procedures to work on private farms and implement monitoring programmes thereafter, - Residents will be provided at least two weeks' notice of exploration operations within 1 km of their property - Continuous engagement with residents and I&APs to identify any concerns or issues, and mitigation and management measures agreed upon, - Compliance with all applicable laws and agreements - Training and raise awareness to sensitise employees about contentious issues such as stock theft and poaching - Restrict movements to areas of activities only, - Restrict vehicle and equipment movements to daytime hours, - Make workers aware and notify them on avoiding some areas, - No animals or birds may be collected, caught, consumed or removed from site - Ensure appropriate supervision of all activities - Accidents and incidents need to be reported to project manager and recorded in incident register 	<p>Weekly and monthly</p> <p>Quarterly meetings with the I&APs</p>	Project manager and or site manager (or nominated site supervisor)

Receptors	Potential impacts	Management / mitigation measures	Monitoring requirements	Responsibility
		<ul style="list-style-type: none"> - Proposal for better communication, as suggested by the proponent to hold quarterly meetings on the mine with the I&APs 		
	<ul style="list-style-type: none"> - Conflict with farmers and neighbours about ambient noise 	<ul style="list-style-type: none"> - Restrict excessive noise to areas of activities only, - Restrict excessive noise to daytime hours (7 am to 7 pm weekdays and 7 am until 1 pm on Saturday), - No activities between dusk and dawn, - Exploration equipment will be suitably positioned to ensure that noisy equipment is away from receptors, - Residents will be provided at least two weeks' notice of exploration operations within 1 km of their property, - Processing in shed will be silent and containerised however the noise will be assessed; surveys will be conducted and coordinated with neighbours - All equipment to be shut down or throttled back between periods of use, - Respect civic aviation regulations about the use of a drone 	Daily and weekly	
	<ul style="list-style-type: none"> - Visual disturbances - Loss of sense of place 	<ul style="list-style-type: none"> - Limit trenching and bulk sampling as far as possible - Position heavy equipment in such a way that it is out of sight from human receptors, - Barriers or fences will be used if exploration occurs in, locations that may affect residents or livestock, 	Daily and weekly	

Receptors	Potential impacts	Management / mitigation measures	Monitoring requirements	Responsibility
		<ul style="list-style-type: none"> - Residents need to be informed at least two weeks in advance that drilling operations are within 1 km of their property, - Maintain good housekeeping, - Restrict speed of vehicles (<30 km/h) - Apply dust suppression where possible (loading, hauling, tipping), - Continuous engagement with residents and I&APs to identify any concerns or issues, and appropriate mitigation and management measures agreed upon 		
	- Dust and emissions	<ul style="list-style-type: none"> - All vehicles and machinery / equipment to be shut down or throttled back between periods of use, - Use existing access roads and tracks where possible, - Apply dust suppression where possible (drilling, trenching / excavating, loading, hauling, tipping), - Restrict speed of vehicles (<30 km/h), - Specific activities that may generate dust and impact on residents will be avoided during high wind events. 	Daily	
	<ul style="list-style-type: none"> - Loss of soil quality due to mixing of earth matter, trampling, compaction and pollution, - Enhanced soil erosion 	<ul style="list-style-type: none"> - Where possible, plan access routes and exploration activities outside of existing drainage lines - Where necessary, install diversions to curb possible erosion - Restore drainage lines when disturbed - Where possible, topsoil should be stockpiled separately, and re-spread during rehabilitation 	Weekly and monthly	

Receptors	Potential impacts	Management / mitigation measures	Monitoring requirements	Responsibility
		<ul style="list-style-type: none"> - Limit the possibility of compaction and creating of a hard subsurface - Limit the possibility of trampling - During exploration activities with heavy equipment oil absorbent matting should be placed under and around the equipment - Equipment must be in a good condition to ensure that accidental oil spills do not occur and contaminate soil - In the event of major spills and leaks, it will be reported (Appendix B) and polluted soils must be collected and disposed of at an approved site, - Limit the possibility to mix mineral waste with topsoil 		
	Water contamination	<ul style="list-style-type: none"> - Ensure spill kits and preventative measures (e.g. drill pads) are in place at exploration sites, - Consider alternative sites when the water table is too high, - Exploration equipment should be dug to direct any accidental spills into sumps, - Waste water will be contained for which a permit is required (Appendix A), - Extraction volumes of water will be minimal during exploration and where possible, water from existing water sources will be used 	Weekly	
Vegetation clearance for access	<ul style="list-style-type: none"> - Loss of plant species - Loss of habitat - Create landscape scars 	<ul style="list-style-type: none"> - Use existing roads for access to avoid new tracks and cut lines 	Daily	<ul style="list-style-type: none"> - Employees, contractors

Receptors	Potential impacts	Management / mitigation measures	Monitoring requirements	Responsibility
routes, drill pads and temporary contractor camps	- Loss of sense of place	<ul style="list-style-type: none"> - Minimise clearance areas through proper planning of the exploration activities - Route new tracks around established and protected trees, and clumps of vegetation - Identify rare, endangered, threatened and protected species. - During toolbox talks and induction, highlight to workers so that the removal of significant plants are avoided - Where possible rescue and relocate plants of significance - Promote revegetation of cleared areas upon completion of exploration activities 		- Site manager (or nominated site supervisor)
	- Alien plants and weeds can accidentally be introduced	<ul style="list-style-type: none"> - All project equipment arriving onsite from an area outside of the project or coming from an area of known weed infestations (not present on the project site) should have an internal weed and seed inspection completed prior to equipment being used - Ensure the potential introduction and spread of alien plants is prevented, and - Ensure the correct removal of alien invasive vegetation and prevent the establishment and spread of alien invasive plants. - Eradicate weeds and alien species as soon as they appear - Make workers aware about alien species and weeds 	Monthly	Site manager (or nominated site supervisor)

Receptors	Potential impacts	Management / mitigation measures	Monitoring requirements	Responsibility
Fuel handling and storage, maintenance on equipment, machinery and vehicles	<ul style="list-style-type: none"> - Soil contamination - Water contamination 	<ul style="list-style-type: none"> - Good housekeeping - Training through toolbox talks and induction - All stationary vehicles and machinery must have drip trays to collect leakages of lubricants and oil - Spill kits and absorption material available during fuel delivery, storage or use - Accidental spills and leaks (including absorption material) to be cleaned as soon as possible - Spills to be reported to the project manager - Fuel spills of greater than 200L to be reported to the authorities - Plant and equipment to be well maintained and serviced regularly (maintenance and service schedules in place), - In the field, use of hydrocarbons under 200L can be used for mobile refuelling or servicing - Bulk fuel will be stored in adequate containment areas (on a non-porous floor, in a bunded area, capable to contain 110% of the volume stored, fenced-in) - Ensure integrity of containment with regularly inspections - Preventative measures will be in place when service and maintenance activities are done (drip trays, non-porous surfaces, funnels, non-damaged containers) - Refuelling and de-fuelling in designated areas (with adequate preventative measures in place) only 	Daily	<ul style="list-style-type: none"> - Employees, contractors - Site manager (or nominated site supervisor)

Receptors	Potential impacts	Management / mitigation measures	Monitoring requirements	Responsibility
Small mining activities	<ul style="list-style-type: none"> - Soil contamination - Water contamination - Dust - Noise 	<ul style="list-style-type: none"> - Good house keeping - Training through toolbox talks and induction - At the plant - all processing activities are containerised and water is recycled - At the tailings dam - install toe paddocks, and if necessary, cut-off trenches. In the worst case, establish a monitoring borehole - Ensure prompt clean-up of processing and tailings spills - In the event of spills and leaks, polluted soils must be collected and disposed of at an approved site - Wastewater discharges will be contained – no disposal of wastewater or processing or tailings effluent - Apply dust suppression where possible (loading, hauling, tipping, crushing, milling) - Restrict excessive noise to areas of activities only - Restrict excessive noise to daytime hours (7 am to 7 pm weekdays and 7 am until 1 pm on Saturday) - No activities between dusk and dawn - Processing in shed will be silent and containerised however the noise will be assessed; surveys will be conducted and coordinated with neighbours 	Daily	<ul style="list-style-type: none"> - Employees, contractors - Site manager (or nominated site supervisor)
Generation of waste	<ul style="list-style-type: none"> - Soil contamination - Water contamination - Nuisance (visual impacts, litter) - Ecological risks 	<ul style="list-style-type: none"> - Good housekeeping - Training and awareness through toolbox talks and induction - Implement a Standard Operational Procedure on waste management, from cradle to grave for all kinds of 	- Daily and weekly	<ul style="list-style-type: none"> - Employees, contractors - Site manager (or nominated site supervisor)

Receptors	Potential impacts	Management / mitigation measures	Monitoring requirements	Responsibility
		<p>waste possible onsite (e.g. hydrocarbons, domestic, waste water)</p> <ul style="list-style-type: none"> – Implement a culture of correct waste collection, waste segregation and waste disposal, complimentary to the waste hierarchy – avoid, re-use, recycle – Avoid hazardous waste onsite 		
<p>Wastewater, flow back water storages, surface and stormwater run offs</p>	<ul style="list-style-type: none"> – Groundwater contamination 	<ul style="list-style-type: none"> – Diversion of surface water and stormwater runoff away from the groundwater drainage system – Maintenance of a running inventory of flowback water recovered, present on site, and removed from the site – Location of return water within secondary containment, away from high traffic areas and as far as is practical from surface waters – Establish protocols for checking/testing stormwater in the containment area prior to discharge – Inspection and preventative maintenance protocols for storage facilities, pumping systems and piping systems, including manned monitoring points during operations, – Inspect groundwater quality through water levels and sampling for early indicatives of any potential heavy metals presence 	<ul style="list-style-type: none"> – Daily and Weekly 	<ul style="list-style-type: none"> – Employees, contractors – Site manager (or nominated site supervisor)
<p>Ambient noise and vibrations during small scale mining</p>	<ul style="list-style-type: none"> – Birdlife disturbance and habitants disruption – High value conservation species that are residing, ground 	<ul style="list-style-type: none"> – Exploration equipment must be suitably positioned to ensure that noisy equipment is away from receptors, – Restrict movements to areas of activities only – Use existing tracks and routes only 	<ul style="list-style-type: none"> – Weekly 	<ul style="list-style-type: none"> – Employees, contractors – Site manager (or nominated site supervisor)

Receptors	Potential impacts	Management / mitigation measures	Monitoring requirements	Responsibility
activities and exploration operations	nesting and slow moving can be disturbed as a result of increased in ambient noise from operations and movements of vehicles	<ul style="list-style-type: none"> - Minimise clearance areas through proper planning of the exploration activities, - Restrict excessive noise to daytime hours - Identify rare, endangered, threatened and protected species in advance (such as the rhinos, and birds (Ludwig’s bustard and Kori bustard)) - Route new tracks around protected species and sensitive areas - Training and raise awareness to sensitise employees and notify them on avoiding some areas where protected species reside - No driving off designated access routes / off-road driving - No animals or birds may be collected, caught, consumed or removed from site - Communicate and send out notices to stakeholders when carrying out noisy activities in the area 		
Job creation, skills development and business opportunities	Beneficial socio-economic impacts on a local and regional scale	<ul style="list-style-type: none"> - Maximise local employment and local business opportunities - Enhance the use of local labour and local skills as far as reasonably possible - Ensure that goods and services are sourced from the local and regional economy as far as reasonably possible. 	- Monthly	Project manager

3 COMMUNICATIONS AND TRAINING

3.1 INTRODUCTION

In order to ensure potential risks and impacts are minimised, it is vital that personnel are appropriately informed and trained on operational procedures that include the above mitigation measures. It is also important that regular communications are maintained with all the stakeholders and made aware of potential impacts and how to minimise or avoid them. This section sets out the framework for communication and training in relation to the EMP.

3.2 COMMUNICATION

During the entire project, the project manager and or site manager (or nominated site supervisor) will communicate site-wide environmental issues to the project team through the following means (as and when required):

- Site induction
- Audits and site inspections
- Toolbox talks, including instruction on incident response procedures, and
- Briefings on key project-specific environmental issues.

This EMP will be distributed to the project team, including contractors, to ensure that the environmental requirements are communicated effectively. Key activities and environmentally sensitive operations will also be briefed to workers and contractors. During the entire project regular communications between the management team will include discussing any complaints received and actions to resolve them; any inspections, audits or non-conformance with this EMP and any objectives or target achievements.

3.3 ENVIRONMENTAL EMERGENCY AND RESPONSE

Table 3 contains a list of numbers to be contacted in case of an emergency. All personnel will be made aware of these numbers.

Table 3 - Emergency contact details

Town	Ambulance (Oanob Private Hospital)	Police	Fire brigade
Rehoboth	+264 (62) 521 400	+264 (62) 523 223 or 10111	+264 (61) 250 084

3.4 COMPLAINTS HANDLING AND RECORDING

Any complaints received verbally or in writing by any personnel on the project site will be recorded by the receiver, including the name and contact details of the complainant, date and time of the complaint, and the nature of the complaint. The information will be given to the project manager who is overall responsible for the management of complaints and will provide a written response to the complainant. The project manager will inform employees of issues, concerns or complaints.

The project manager will maintain a complaint register that will detail the name and contact details of the complainant, date and time of the complaint, nature of the complaint, action is taken to resolve issues, and date of complaint handover. The project manager will be responsible for nominating the correct personnel to coordinate and resolve the issue.

The workforce will be informed about the complaints register, its location and the person responsible, in order to refer local residents or the general public who wish to lodge a complaint. The complainant will be informed in writing of the results of the investigation and action to be taken to rectify or address the matter(s). Where no action is taken, the reasons are to be recorded in the register and reported to the complainant. The complaints register will be kept for the duration of the project and will be available for government or public review upon request.

3.5 TRAINING AND AWARENESS

- All personnel working on the project will be competent to perform tasks that have the potential to cause an environmental impact. Competence is defined in terms of appropriate education, training and experience.

3.6 SITE INDUCTION

- All personnel involved in the project, contractors and visitors will be inducted to the site with specific environmental and social awareness training, and health and safety issues. The environment and social awareness training will ensure that everybody onsite is familiar with the principles of this EMP, the environment and social aspects and impacts associated with their activities, the procedures in place to control these impacts and the consequences of departure from these procedures.
- The project manager will ensure a register of completed training is maintained.
- The site induction should include, but is not limited to the following:
 - A general site-specific induction that outlines:
 - What is meant by "environment" and "social"
 - Why the environment needs to be protected and conserved
 - How operational activities can impact on the environment, and
 - What can be done to mitigate against such impacts.
 - The inductee's role and responsibilities with respect to implementing the EMP

-
- The site environmental rules
 - Details of how to deal with, and who to contact if environmental problems should occur
 - Basic vegetation clearing principles and species identification sheets
 - Focal themes such as compliance, contentious issues (e.g. stock theft, poaching), reporting of accidents and incidents, good housekeeping and standard procedures for waste management
 - The potential consequences of non-compliance with this EMP and relevant statutory requirements, and
 - The role of responsible people for the project.

4 REPORTING COMPLIANCE AND ENFORCEMENT

4.1 ENVIRONMENTAL INSPECTIONS AND COMPLIANCE MONITORING

4.1.1 DAILY INSPECTIONS

- A copy of this EMP will be on site throughout the duration of the project and will be available upon request. It is the responsibility of the project manager and site manager (or nominated site supervisor) to ensure this EMP is complied with through their daily roles. Daily, weekly and monthly inspections will be undertaken. Any environmental problems or risks identified will be notified to the project manager and actioned as soon as is reasonably practicable.

4.1.2 MONTHLY INSPECTIONS

- Monthly inspections will be undertaken by the site manager to check that the standards and procedures set out in this EMP are being complied with and pollution control measures are in place and working correctly. Any non-conformance will be recorded, including the following details: a brief description of non-conformance; the reason for the non-conformance; the responsible party; the result (consequence); and the corrective action is taken and any necessary follow up measures required (Appendix E).

4.2 REPORTING

There will be a requirement to ensure that any incident or non-compliance, including any environmental issue, failure of equipment or accident, is reported to the project manager.

4.3 ENVIRONMENTAL PERMITS

- Whilst the Water Resources Management Act, No. 11 of 2013 is not enforced, it is best practice to adhere to its stipulations while ensuring compliance with the Water Act, No. 54 of 1956, which is maintained still. A licence to abstract and use water may be required if boreholes are to be drilled, although this is unlikely. If required, the proponent will apply for relevant permits and will operate in accordance with any conditions of the licence.

Some vegetation will be cleared on the EPL to allow exploration activities to commence. Therefore a permit under the Forest Act, No. 12 of 2001 as amended by the Forest Amendment Act, No. 13 of 2005 and its regulations of 2015 is required.

4.4 CHANCE FIND PROCEDURE

- A heritage site survey was conducted by Dr John Kinahan, an Archaeologist on a selected focus area (as identified by the proponent) on a portion of EPL 7699. Areas identified for

proposed exploration activities are subject to a heritage survey and subsequent assessment. These surveys are based on surface indications alone, and it is therefore possible that sites or items of heritage significance will be found in the course of development work. The procedure set out here cover the reporting and management of such finds.

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

Compliance: The “chance finds” procedure is intended to ensure compliance with relevant provisions of the National Heritage Act (27 of 2004), especially Section 55 (4): *“a person who discovers any archaeological objectmust as soon as practicable report the discovery to the Council”*.

Table 4 below shows the procedure of reporting so that heritage remains reported to the NHC are correctly identified in the field.

Table 4 - Responsibilities and duties of certain roles within the Project

Role	Responsibilities & Duties
Operators and contractors	To exercise due caution if archaeological remains are found
Site manager	To secure site and advise management timeously
Proponent and Exploration managers	To determine safe working boundary and request inspection
Archaeologist	To inspect, identify, advise management, and recover remains

4.4.1 PROCEDURES

Action by person identifying archaeological or heritage material:

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

Action by site manager:

- Report findings, site location and actions taken proponent and exploration managers
- Cease any works in immediate vicinity

Action by proponent and exploration managers:

- Visit site and determine whether work can proceed without damage to findings

-
- Determine and mark exclusion boundary
 - Site location and details to be added to project GIS for field confirmation by archaeologist
- Action by archaeologist:
- Inspect site and confirm addition to project GIS
 - Advise NHC and request written permission to remove findings from work area
 - Recovery, packaging and labelling of findings for transfer to National Museum

In the event of discovering human remains, procedures are to be carried out as per the above. Moreover, a field inspection by archaeologist is to be actioned to confirm that remains are human, following a liaison with NHC and Police. Thereafter, the recovery of remains and removal to National Museum or National Forensic Laboratory, should be actioned as directed.

4.5 NON-COMPLIANCE

Where it has been identified that activities are not compliant with this EMP, the project manager will take corrective actions so that the activities return to being compliant as soon as possible. In instances where the requirements of the EMP are not upheld, a non-conformance and corrective action notice will be produced. The notice will be generated during the inspections and the project manager will be responsible for ensuring a corrective action plan is established and implemented to address the identified shortcoming.

- A non-compliance event / situation, for example, is considered if:
- There is evidence of the contravention of this EMP and associated indicators or objectives
- The project manager and or site manager (or nominated supervisor) have failed to comply with corrective or other instructions issued by the project manager or qualified authority, or
- The project manager and /or site manager (or nominated supervisor) fail to respond to complaints from the public.
- Activities causing non-compliance will be stopped in the event of a non-compliance until corrective action(s) has been completed.

4.6 INCIDENT REPORTING

The project manager must ensure that an accident and incident (including minor or near-miss) reporting system is maintained so that all applicable statutory requirements are covered. For any serious incident involving a fatality, or permanent disability, the incident scene must be left untouched until witnessed by a representative of the police. This requirement does not preclude immediate first aid being administered and the location being made safe.

The project manager must investigate the cause of all work accidents and significant incidents and must provide the results of the investigation and recommendations on how to prevent a recurrence of such incidents. A formal root-cause investigation process should be followed.

4.7 DISCIPLINARY ACTION

- This EMP is a legally binding document and non-compliance with it will result in disciplinary action being taken against the perpetrator/s. Such action may take the form of (but is not limited to):
 - Fines / penalties
 - Legal action
 - Monetary penalties imposed by the proponent on the contractor
 - Withdrawal of license/s, and
 - Suspension of work.
- The disciplinary action will be determined according to the nature and extent of the transgression / non-compliance, and penalties are to be weighed against the severity of the incident.

5 ENVIRONMENTAL AND SOCIAL MANAGEMENT

5.1 OBJECTIVES AND TARGETS

- Environmental objectives for the project are as follows:
- Zero pollution incidents
- Minimal vegetation clearing
- Protect local flora and fauna
- Minimise the generation of waste, and
- Minimal interruption to farm activities

5.2 IMPACTS IDENTIFIED FOR FURTHER ACTIONS

5.2.1 IMPACTS ON GROUNDWATER

Wastewater is produced during operational activities of the mine, for the current small scale mining activities, wastewater is contained in a Stormwater Return Dam (SWRD). The SWRD is unlined but it is equipped with a pump in order to ensure that no freestanding water remains for a long duration within the SWRD, thereby reducing potential seepage to groundwater. The effectiveness of these management and mitigation measures, to reduce the potential impact of groundwater contamination, should be monitored on a monthly basis, by taking groundwater level measurements and water quality sampling. A water sample was taken in June 2009 at the Mertens borehole no. 3 and it showed that the overall classification of the water was in Group B, which is good quality water. In January 2020, a similar control sample was taken, confirming the same quality water. If monitoring is not conducted as stated above then the pond should be lined.

An environmental audit was conducted at the Mertens site in August 2020, to verify the on-site compliance with various pieces of Namibian environmental legislation and international environmental best practice.

As per the environmental audits and recommendations, it is suggested that applied behaviour analysis (ABA) time sampling and analyses be completed for the waste rock dumps (WRD) and tailing storage facilities (TSF) with complementing leach tests to understand and analyse the extent pollution potential of the site. The development of a formal storm water management plan is suggested to manage stormwater run-off and reduce the impacts of soil erosion and the drilling of at least one groundwater monitoring borehole down-gradient of the site. The return water facility should be lined or operational procedures should clearly indicate that no water should be stored in the facility to reduce the risk of seepage losses.

The potential pathways for contamination include some of the following aspects:

- Seepage of heap leach facility and/or tailings water;
- Operational leaks and spills;

- Failure of TSF integrity;
- Seepage or overflow from decant and evaporation ponds;
- Drainage from and erosion of WRD surfaces; and
- Saline final void surface water contaminating surrounding ground water.

It is further suggested that any open water accumulating in the pits be sampled on a monthly basis and analysed for chemical constituents highlighted from the leach tests to track any potential risk of causing harm to animals drinking the water. Some tailings spillage were observed near the fence along the tailings slurry pipeline route, the site should be cleaned and a spillage clean-up procedure be written and implemented by the proponent.

The implementation of the suggested corrective action for each finding will enable the mine to improve the environmental performance and ensure future legal compliance.

5.2.2 IMPACTS ON AVIAN FAUNA AND HIGH VALUE CONSERVATION SPECIES

Protected species such as the rhino are occasionally present in the area, poaching of high value conservation species in Namibia is illegal. The proponent and business partners should avoid the disruption of protected and threatened species (rhinos that occur in the area) and birds such as the Ludwig's Bustards and Kori Bustards. The extensions of exploration and mining operation were found to have potential impacts on biodiversity namely birdlife due to the effects of vibration and ambient noise. These birds are ground nesting and they may be susceptible to ground vibrations and therefore could potentially be directly affected by the project activities.

The mining and hauling process will be restricted to daylight, whilst processing and drilling may continue at night. Mitigation measures identified possible relocation of species at risk (if viable), ongoing monitoring to determine if activities are impacting birds, altering exploration or mine plans to avoid activities that impact on nesting during nesting periods (egg-laying season is from February-May in Namibia).

6 REGISTER OF ENVIRONMENTAL RISKS AND ISSUES

6.1 INTRODUCTION AND KEY RISKS

An environmental review of the proposed Project has been completed to identify all the commitments and agreements made within the environmental scoping report for the amended portions of the Project. From this, a schedule of environmental commitments and risks has been produced, which details deliverables including measures identified for the prevention of pollution or damage to the environment during the construction phase. Monitoring criteria to be adhered are listed under the specific monitoring plan and/or programme.

It has been evaluated that all risks associated with the additional mining claims 68853 and 68854 are low to minor. All mitigation measures have been incorporated into this EMP.

7 IMPLEMENTATION OF THE EMP

Exploration work will be carried out in compliance with the relevant requirements of the Minerals (Prospecting and Mining) Act, 1992. No significant impacts are anticipated for the activities that have been identified and management and mitigation measures are in place for potential risks.

This EMP:

- Has been prepared pursuant to a contract with the proponent
- Has been prepared on the basis of information provided to ECC up to June 2020
- Is for the sole use of the proponent, for the sole purpose of an EMP
- Must not be used (1) by any person other than the proponent or (2) for a purpose other than an EMP, and
- Must not be copied without the prior written permission of ECC.

ECC has prepared the EMP on the basis of information provided by the proponent and the environmental scoping report.

APPENDIX A – APPLICATION FOR A WASTEWATER DISCHARGE LICENCE



DEPARTMENT OF WATER AFFAIRS & FORESTRY

FAX: (061) 208 7160 PRIVATE BAG 13184
 TEL: (061) 208 7111 WINDHOEK
 REFERENCE NO: NAMIBIA

**APPLICATION FOR A WASTEWATER DISCHARGE LICENCE, IN TERMS
OF PART XIV OF THE WATER RESOURCES MANAGEMENT ACT, 2004**

(Act No. 24 of 2004 - as published in the Government Gazette of the Republic of Namibia, No. 3357, of 23 December 2004, Government Notice No. 284)

A. GENERAL INSTRUCTIONS

1. Applications must be submitted in duplicate to:
 The Permanent Secretary
 Attn.: Law Administration
 Ministry of Agriculture, Water and Forestry
 Private Bag 13184
 WINDHOEK
2. Application Fee (to accompany this document): N\$_____
3. The various sections have to be completed as follows:
Section B & C - All applicants
Section D - Complete only the part relevant to technology employed in your works.
Section E - All applicants (compulsory!)
4. Only the relevant Sections that have been filled in need to be submitted with this application.
5. A separate application needs to be filled in for each different plant/works.

NAME OF TREATMENT PLANT/WORKS: _____

PLACE: _____ **GPS Coordinates:** _____
 (e.g. town, settlement)

B. GENERAL INFORMATION

1. Name of applicant: _____

2. Address - Contact Person: _____

- Postal: _____

- Physical: _____

- Tel No.: _____

- Fax No.: _____

- E-mail: _____

3. Region in which plant is situated: _____

4. Constituency in which plant falls: _____

5. Type of establishment:
(e.g. school, town, industry) _____

6. Source of water supply:
(e.g. borehole, river, sea) _____

7. Total water consumption: _____ m³/day ADWF*

(*ADWF = Average Dry Weather Flow) _____ m³/day ADWF*

- Consumption based on the average usage over a 12-month period. _____ m³/day ADWF*
- List different sources separately _____ m³/day ADWF*

8. Application:

- Prepared by: Name : _____ Position: _____
(e.g. Consultant) Signature: _____ Date: _____
- Responsible Executive: Name : _____ Position: _____
Signature: _____ Date: _____

C. TECHNICAL DETAILS - GENERAL

Answers to the following information must be contained in this application either from the questionnaire or as an attachment thereto (see also details in Appendix A):

NAME OF TREATMENT PLANT/WORKS: _____

1. Type of effluent (please also refer to Section D for classifications): _____

2. Site of works:

2.1 Submit a site plan indicating the exact location (or intended location) of the works. This plan should indicate (as a minimum):

2.1.1 General location of the works with regards to settlements, main roads, boreholes, rivers etc.

2.1.2 Layout plan of property showing all existing and proposed water pipes and effluent and drainage lines in distinctive colours.

2.1.3 Topographical plan/area photograph/contour plans showing the property and effluent treatment plant in relation to residential areas, rivers, pans, dams, lakes and boreholes.

2.1.4 Contour plans indicating the exact location of the effluent treatment works and point of discharge of final effluent in relation to watercourses that drain the area.

2.1.5 Give the following information:

2.1.5.1 Distance to nearest inhabitants: _____m

2.1.5.2 Distance to nearest water abstraction point (e.g. river, borehole): _____m

2.1.5.3 Distance to nearest watercourse (e.g. dry river) and specify: _____m

2.1.5.4 Wind direction (main/normal) _____

2.2 Submit overall details of works:

2.2.1 Type of effluent treatment system and a brief description of its method of operation. (If domestic effluents are dealt with by the local authority please enclose a letter from the authority confirming this agreement).

2.2.2 Flow diagram/mass balances to show the present average quantities of incoming water, recycled water, final outflow, seepage and evaporation losses (all in m³/day).

2.2.3 Layout orientation drawing indicating all major treatment units and fence around works.

2.2.4 Complete flow diagram and key design parameters to include:

2.2.4.1 Dimensions and design capacities of each unit process;

2.2.4.2 Process Flow Diagram(s) and major instrumentation employed, e.g. water meters;

2.2.4.3 Loadings on the system (e.g. hydraulic, COD, BOD, nitrogen, phosphate);

2.2.5 Indicate allowances that have been made for future expansion and increased loads (if any).

2.2.6 Methods of sludge disposal or recirculation.

2.2.7 Disinfection of the final effluent (indicate dosing type, method, retention period and optimum disinfectant level in final effluent).

3. Monitoring boreholes for monitoring groundwater pollution over time must be available within 500 m of the point of final effluent discharge.

4. Please note: Additional information is required for new treatment plants (e.g. an environmental impact assessment) - details can be obtained from the Department of Water Affairs and Forestry.

5. All relevant information must be included with this application. **It is a criminal offence to deliberately withhold vital information relevant to this application.** Where applicants are found to be in contravention with this requirement, they may/will be prosecuted.

D. TECHNICAL DETAILS - SPECIFIC

Applicants should only complete sections relevant to their specific effluent (please tick relevant box):

- | | |
|--------------------------|--|
| <input type="checkbox"/> | D-1: Domestic Effluent - Includes wastewater collected in towns (excluding industrial effluent!), villages, schools, lodges, administration buildings. |
| <input type="checkbox"/> | D-2: Industrial Effluent - Includes wastewater generated by any industry, factory, etc. |
| <input type="checkbox"/> | D-3: Mining Effluent - Includes wastewater accumulated or collected due to mining operations (e.g. Acid mine wastewater) |
| <input type="checkbox"/> | D-4: Combination/mix of various effluents (list major effluent streams on page 11) |

Final Effluent Reuse

The pressure on Namibia's existing fresh-water supplies can, to a great extent, be eased by the sensible reuse of effluents for a variety of purposes including dust control, agriculture and industrial processes. Therefore, reuse of effluent after suitable treatment is encouraged.

The allowable reuse of an effluent is dependent upon its quality as well as many local circumstances and hence each application in this category needs careful and individual scrutiny, which should be undertaken by a specialist in this field and must be supported by an environmental impact assessment study.

A separate licence for effluent reuse is required and more details in this regards can be obtained from the Department of Water Affairs and Forestry.

D-2. INDUSTRIAL EFFLUENTS

Plant Name:

2.1	Describe industry and major activities resulting in effluent generation	
2.2	Capacity / Flowrates :	
	Design - Average daily flow	m ³ /d
	- Peak hourly flow	m ³ /h
	Actual (if in operation) - Average daily flow	m ³ /d
	- Peak hourly flow	m ³ /h
	If ponds are employed, state total surface area	m ²
2.3	List only major contaminants (also attach full analysis of typical effluent sample)	
2.4	Type of treatment employed (give short overview of process):	
2.5	List major treatment chemicals* employed in the unit process(es):	
2.6	Final effluent quality after treatment (put envisaged final quality for a new plant):	
2.7	Sludge generation:	
	- Volume generated	m ³ /d
	- Mass	kg/d (dry solid)
	- Method of disposal	
	- Place of disposal	
	- Major constituents	
	- If sludge ponds, state frequency of cleaning	
2.8	Do you employ cleaner production principles (CPP)?	Yes/No
	If "yes", elaborate:	
2.9	Is the following documentation included (give reason if not)?	
	▪ Water (and waste) management plan:	Yes/No
	▪ Decommissioning plan:	Yes/No

* For the chemicals employed, proper mass balances should be included that show chemical usage, movement and discharge within the factory/process(es). All safety aspects related to handling, storage and disposal of chemicals on site must be followed at all times.

D-4. COMBINATION OF VARIOUS EFFLUENTS

Plant Name:

4.1	Describe major activities resulting in effluent generation (e.g. type of industry):				
4.2	Capacity / Flowrates of different streams (major only)	1	2	3	
	Type (e.g. domestic, industrial, mining, others)				
	Design - Average daily flow				m ³ /d
	- Peak hourly flow				m ³ /h
	Actual (if in operation) - Average daily flow				m ³ /d
	- Peak hourly flow				m ³ /h
4.3	List only major contaminants (also attach full analysis of typical effluent sample)				
4.4	Type of treatment employed (give short overview of process)				
4.5	List major treatment chemicals employed in the unit process(es):				
4.6	Final effluent quality after treatment (put envisaged final quality for a new plant)				
4.7	Sludge generation:				
	- Volume generated				m ³ /d
	- Mass				kg/d (dry solid)
	- Method of disposal				
	- Place of disposal				
	- Major constituents				
	- If sludge ponds, state frequency of cleaning				

D-4. COMBINATION OF VARIOUS EFFLUENTS

Plant Name:

4.1	Describe major activities resulting in effluent generation (e.g. type of industry):				
4.2	Capacity / Flowrates of different streams (major only)	1	2	3	
	Type (e.g. domestic, industrial, mining, others)				
	Design - Average daily flow				m ³ /d
	- Peak hourly flow				m ³ /h
	Actual (if in operation) - Average daily flow				m ³ /d
	- Peak hourly flow				m ³ /h
4.3	List only major contaminants (also attach full analysis of typical effluent sample)				
4.4	Type of treatment employed (give short overview of process)				
4.5	List major treatment chemicals employed in the unit process(es):				
4.6	Final effluent quality after treatment (put envisaged final quality for a new plant)				
4.7	Sludge generation:				
	- Volume generated				m ³ /d
	- Mass				kg/d (dry solid)
	- Method of disposal				
	- Place of disposal				
	- Major constituents				
	- If sludge ponds, state frequency of cleaning				

E. FINAL EFFLUENT DISPOSAL

1.4.1	Where is the final effluent discharged to? (E.g. French drain, pumped out by Local Authority, dry river course, perennial river, etc.)	
1.4.2	IF soakaway, state: - Type of soil - Suitability/porosity of soil - Size of soakaway area - Include topography and plan of soakaway area	
1.4.3	Is there any post-treatment applied? (e.g. disinfection, filtration)	
1.4.4	Is the final effluent re-used? (Yes/No)	
	If "Yes", complete:	
	- Do you have a reuse licence?	
	- Amount of water that will be re-used:	m ³ /d
	- For what application:	
	- Type of irrigation used (if applicable):	
	- What crops are grown:	
	- Area of land that will be irrigated:	ha
1.4.5	Name (if any) downstream users (downstream of discharge point).	
1.4.6	Past records of complaints or objections by people living close to works:	

Reuse:

A reuse licence is required – details can be obtained from the Department of Water Affairs and Forestry.

Irrigation:

The crops allowed to be irrigated are dependent upon effluent quality (details will be supplied on request by the Department of Water Affairs and Forestry).

APPENDIX B – REPORTING OF MAJOR PETROLEUM PRODUCT SPILL FROM PP/11

64	Government Gazette 23 June 2000	No. 2357
		FORM PP/11
MINISTRY OF MINES AND ENERGY		
PETROLEUM PRODUCTS AND ENERGY ACT, 1990		
PETROLEUM PRODUCTS REGULATIONS (2000)		
REPORTING OF MAJOR PETROLEUM PRODUCT SPILL		
<i>(Regulation 49(1))</i>		
(Please note that where form is completed by hand it must be completed in capital letters)		
1. Name of licence/certificate-holder/person <i>(*Delete whichever is not applicable)</i>		
2. Postal address		
3. Physical address		
4. Telephone Number (including code)		
5. Facsimile Number (including code)		
6. Licence/certificate* number and date of issue, if applicable <i>(*Delete whichever is not applicable)</i>		
7. Date of petroleum product spill		
8. Location of petroleum product spill		
9. Reasons for petroleum product spill		

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10. Type of petroleum product involved in petroleum product spill

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11. Quantity of the petroleum product spill

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12. Indicate whether the petroleum product has or will have any negative effect on the environment and the safety and health of person or the property of persons

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13. Provide full details of all remedial actions taken to minimise risks associated with petroleum product spills and all cleaning-up operations taken in connection therewith

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DECLARATION

I,,
hereby declare that the information submitted by me in this application is true and correct.

.....
Signature

.....
Place

.....
Date

APPENDIX C – TEMPLATE FOR MONITORING

INSPECTION DATE: _____

INSPECTION COMPLETED BY: _____

SUMMARY OF ACTIVITIES OCCURRING:

Ref No.	Item	Requirements	Responsibility	Compliant	Notes / Action Taken / Corrective Action Required
1	Noise	<ul style="list-style-type: none"> - Is the facility avoiding noise generating activities at night? - Is scheduling of works to avoid disturbance between the hours of 22pm and 5 am in place? - Are Saturday operational periods from 8 am – 12 noon, when near residential areas? - Are procedures for receiving complaints from nearby land users or residents in place and mitigation measures implemented should operations generate excessive noise? 	- SHE Representative	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
2	Operations of mechanical equipment and engines	<ul style="list-style-type: none"> - Are regular checks of all equipment conducted routinely? - Are equipment services up to date? - Are spill kits and/or drip trays available? 	<ul style="list-style-type: none"> - SHE Representative, and - General Manager 	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	

Ref No.	Item	Requirements	Responsibility	Compliant	Notes / Action Taken / Corrective Action Required
3	Production and effluent discharge	<ul style="list-style-type: none"> - Is the domestic and industrial effluent discharged off into approved systems? - If not, are regular water quality samples taken to ensure the treated wastewater complies to the prescribed general standards as set out in the Water Resources Management Act, 2004 (Act No. 24 of 2004)? 	<ul style="list-style-type: none"> - SHE Representative, and - General Manager 	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
4	Solid waste generation	<ul style="list-style-type: none"> - Has the waste management plan and the application of the waste management hierarchy implemented? - Are suitable collection points in place for waste collection at the factory? - Is waste collected regularly and transported correctly? - Is hazardous waste such as waste oil/lubricant stored in a hazardous waste storage area and disposed of by accredited hazardous waste handlers such as Rent A Drum? 	<ul style="list-style-type: none"> - SHE Representative, and - General Manager 	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
5	Lighting	<ul style="list-style-type: none"> - Are energy-efficient light bulbs installed? - Is unnecessary lighting avoided where possible? - Are lights switched off at night? 	<ul style="list-style-type: none"> - SHE Representative, and - General Manager 	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
7	Air Emissions	<ul style="list-style-type: none"> - Are the dust extractors cleaned regularly? - Are vehicles serviced regularly to reduce emissions? - Is there dust monitoring system in place? 	<ul style="list-style-type: none"> - SHE Representative 	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
8	PPE	<ul style="list-style-type: none"> - Are personnel wearing the correct PPE? - Is PPE in good condition? - Are there any complaints on the health of workers 	<ul style="list-style-type: none"> - SHE Representative 	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	

APPENDIX D – COMPLAINTS REGISTER TEMPLATE

NAME	CONTACT DETAILS	DATE AND LOCATION OF COMPLIANT	NATURE OF COMPLIANT	ACTION TAKEN TO RESOLVE	NOMINATED PERSON TO RESOLVE ISSUE (Signature)	DATE OF RESOLUTION/ CLOSED OUT COMPLAINT

APPENDIX E – MONTHLY INTERNAL COMPLIANCE CERTIFICATE

FOR THE PERIOD TO

MANAGEMENT REPRESENTATIVE:

SIGN:

SHE Representative:

SIGN:

Date of Submission:

Key activities on site during the month:

NON-CONFORMANCE:

Area of activity:

Reason:

Responsible party:

Results:

Correction action taken:

Intended follow up:

Additional Comments: