

ENVIRONMENTAL MANAGEMENT PLAN

PROPOSED EXPLORATION ACTIVITIES ON MINING CLAIMS 73612,
73613, 73614, 73615 AND 73616 IN KUNENE REGION
FOR BASE AND RARE METALS, INDUSTRIAL MINERALS, PRECIOUS
METALS AND SEMI-PRECIOUS STONES

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TITLE PAGE

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ABBREVIATIONS

CFP	Chance Finds Procedure
ECC	Environmental Clearance Certificate
EA	Environmental Assessment
EIA	Environmental Impact Assessment
EMA	Environmental Management Act
EMP	Environmental Management Plan
EPL	Exclusive Prospecting Licence
ESAR	Environmental Scoping Assessment Report
MC	Mining Claim
MEFT	Ministry of Environment, Forestry and Tourism
MME	Ministry of Mines and Energy

1. INTRODUCTION

1.1 Project Description and Location

The mining claims (73612, 73613, 73614, 73615 and 73616) are located in Opuwo district in Kunene Region. The mining claims can be accessed via D3703 road from Opuwo town. GPS coordinates (latitude: -18.024496° and longitude: 13.760780°).

The Proponent, Mr. Romeo Nauseb intends to carry out small-scale exploration activities of Base and Rare Metals, Industrial Minerals, Precious Metals and Semi-Precious Stones. This proposed project is a listed activity according to the Environmental Management Act of 2007 and its Environmental Impact Assessment (EIA) Regulations of 2012.

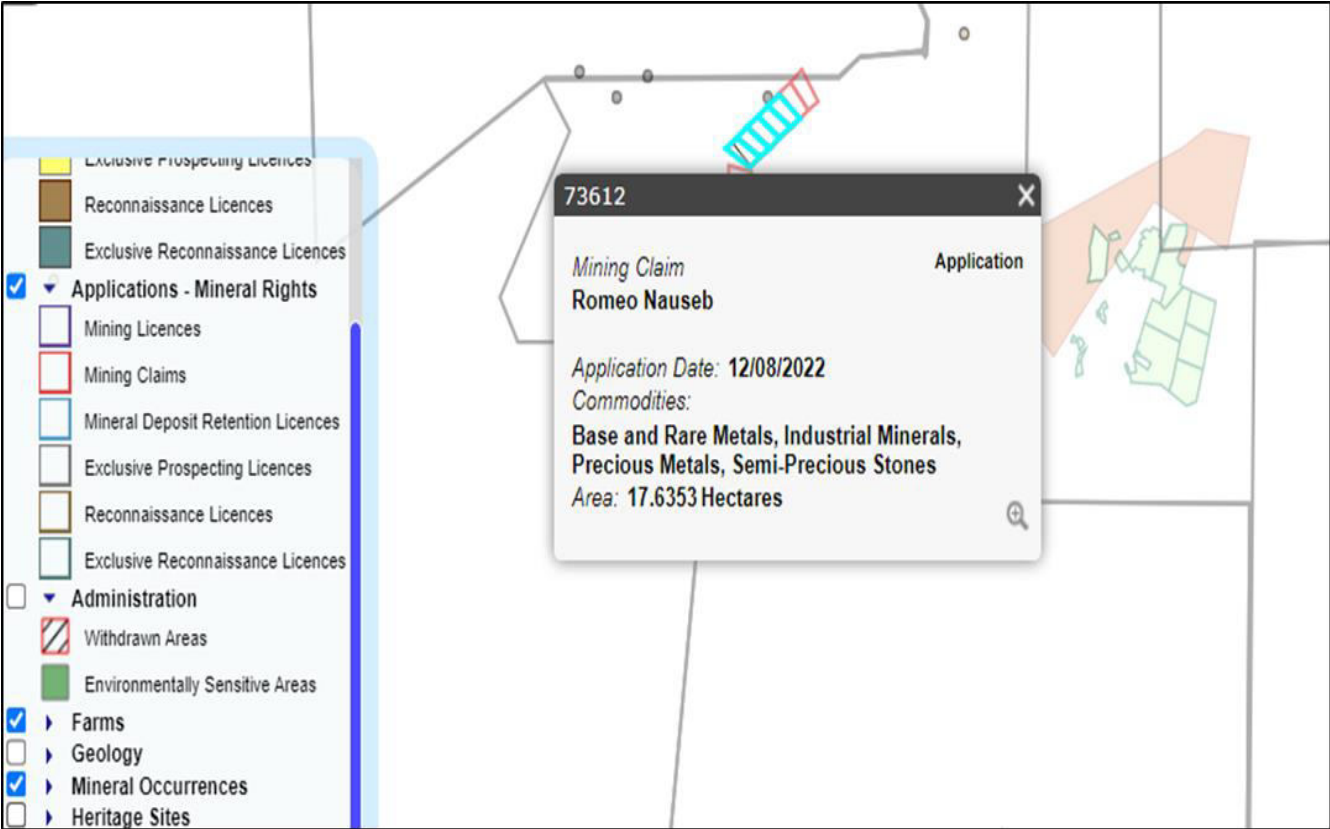


Figure 1: Project location of Mining Claims 73612-73616 in Kunene Region on the Mining Cadastre Portal (accessed on 12 June 2023).

1.2 Purpose and Scope of the EMP

The information in this Environmental Management Plan (EMP) is established on the project description as provided in the environmental scoping assessment report (ESAR). This EMP delivers a reasonable summary, likely mitigation measures and controlling/managing methods for the proposed exploration activities linked with the planned project to ensure that likely environmental and social impacts/effects are mitigated and reduced; to make sure that legislative and other acceptable requirements are complied with and adhered to at all times.

Clear in the EMP are the practices, techniques, roles and responsibilities of personnel, contractors and the proponent to ensure that the administration schedules are efficiently and correctly executed. This EMP report is a supplementary report to the environmental scoping assessment report. This Environmental Management Plan shall be updated whenever there are amendments/changes in the scope of works.

The work force working on this planned project shall be by law mandatory to comply and adhere to the principles set out in this EMP. The scope of this Environmental Management Plan takes into consideration of all undertakings that will be conducted during the exploration phase in the search for base and rare metals, industrial minerals, precious metals and semi-precious stones on Mining Claims 73612, 73613, 73614, 73615 and 73616 in Kunene region.

1.3 Compliance to the EMP

This EMP is a legally binding document as stipulated in the Environmental Management Act, 2007 (Act No. 7 of 2007). The Proponent, contractors and employees must therefore adhere and comply with the context of this document. Any changes made dependent on the changing environments and new additional information that may be available in the future, must be revised consequently with the provision of the EMA.

Non-compliance shall be recorded, including a brief explanation and the cause for the non-compliance, the person responsible, the consequence, and the correct action taken and any follow up measures required.

1.4 Limitations and Assumptions

The Safety Management Plan shall be developed by the Proponent. This EMP is based on the project description in the Environmental Scoping Report.

2. REGULATORY FRAMEWORK

2.1 Environmental Requirement

This anticipated project is a listed activity as specified in the Environmental Management Act No. 7 of 2007 and the Environmental Impact Assessment Regulation No. 30 of 2012. As a listed activity an application for an Environmental Clearance Certificate is mandatory. An Environmental Scoping Assessment Report and EMP are compulsory as part of the ECC application to supplement the process.

This EMP has been embarked on in accordance with the requirements of the Environmental Management Act, No. 7 of 2007 and its regulations.

Table 1: Legislations, Acts and Policies of relevance

Legislation	Applicability	Legislation Objective(s)
The Namibian Constitution	To maintain the ecosystems, ecological processes and biological diversity by conducting Environmental Impact Assessment (EIA).	"The state shall actively promote and maintain the welfare of the people by adopting policies that are aimed at...maintenance of ecosystems, essential ecological processes and the biological diversity of Namibia and utilization of natural resources on a sustainable basis for the benefit of all Namibians, both for present and future".

<p>Environmental Management Act No.7 of 2007</p>	<p>Legal requirement to carry out an Environmental Impact Assessment (EIA).</p>	<p>The Environmental Management Act No.7 of 2007 promotes the sustainable management of the environment and the use of natural resources and provides for the process of assessment and control of activities which may have significant effects on the environment; and provides for incidental matters. The Act ensures that potential impacts are considered, a comprehensive stakeholder's consultation is carried out, all interested and affected parties are given a chance to comment/object on the project. The Act as well provides a list of activities that may not be undertaken without an Environmental Clearance Certificate.</p>
<p>Environmental Impact Assessment (EIA) Regulations (GN notice No. 30 of 2012)</p>	<p>Provides guidelines for Environmental Assessments.</p>	<p>Provides procedures for Environmental Assessments.</p>

<p>Minerals (Prospecting and Mining) Act No.33 of 1992 As amended Minerals (Prospecting and Mining) Amendment Act 8 of 2008</p>	<p>Governs all mining activities in the country.</p>	<p>To provide for the reconnaissance, prospecting and mining for, and disposal of, and the exercise of control over, minerals in Namibia; and to provide for matters incidental thereto</p>
<p>Public Health Act No. 36 of 1919</p>	<p>Safeguards the public is protected from noise, dust and air pollution.</p>	<p>No person shall cause a nuisance or shall suffer to exist on any land or premises owned or occupied by him or of which he is in charge any nuisance or other condition liable to be injurious or dangerous to health.</p>
<p>Water Resources Management Act No. 11 of 2013</p>	<p>Guarantees that the water systems are not polluted and that pollution control mechanisms are in place.</p>	<p>An Act to provide for the management, protection, development, use and conservation of water resources; to provide for the regulation and monitoring of water services and to provide for incidental matters.</p>
<p>Environmental Policy Framework (1995)</p>	<p>Provides guidelines for EIA.</p>	<p>The Policy ensures that all developmental projects are subjected to environmental assessments so that all</p>

		potential impacts are taken into consideration and incorporated into the planning and development stages.
Labour Act No. 11 of 2007	Regulates labour in general, remuneration, etc in the country.	The Labour Act regulates labour in general and protects the safety, health and welfare of employees. The regulation of 1997 relating to the safety and health of employees at work, sets out the duties of employers, welfare and facilities at the work place.
Soil Conservation Act No. 76 of 1969	Promotes soil conservation.	The Act promotes the conservation of soil and the prevention of soil erosion.
National Heritage Act No. 27 of 2004	Provides protection and conservation of places and objects that has national heritage significance; and the registration of such places or objects.	The Act makes provision for the protection of places and objects of heritage significance and the registration of such places and objects. Section 46 of the Act, further prohibits the removal, damage, alteration,

		excavation of national sites or remains; and Section 48, sets out the procedure for application and granting permits for exploration activities such as trenching, drilling, etc.
Hazardous substances Ordinance No. 14 of 1974	Controls the handling of hazardous substances such as fuel, fire, etc.	The Ordinance controls the handling of hazardous substances such as manufacturing, imports and exports to ensure human and environmental safety.
Petroleum Product and Energy Act No, 13 of 1990	Provides for the safe handling of the petroleum products such as fuel and lubricants	The Act provides a framework for handling and distribution of petroleum products which may include purchase, sale, supply, acquisition, possession, disposal, storage or transportation thereof.
Word's Best Practices	Precautionary Approach Principle (Polluter Pays Principle). In cases of pollution, the proponent bears the full responsibility to clean up the environment.	Polluter must be responsible to clean up the environment.

3. PROJECT PERSONNEL, ROLES AND RESPONSIBILITIES

The Proponent, will be in ownership of the Environmental Clearance Certificate for this planned project and shall be accountable for the execution and administration of this Environmental Management Plan. The execution, monitoring and administration of this EMP shall be carried out on day-to-day responsibilities and monthly reviews. All contractors should be guided by this EMP.

The proponent shall arrange for a project team to manage and carry out the work and exploration activities consisting of the proponent's personnel and contractors. One employee shall be identified by the Proponent to help assist and support the Proponent at all times for the duration of the project.

The proponent shall be liable to make sure that the project crew, suppliers and/or contractors, adhere and comply with the set out measures in this Environmental Management Plan; guarantee that all employees get satisfactory training and coaching; and that environmental responsibilities are clearly agreed and understood.

3.1 Roles and Responsibilities

The below table shows the roles and responsibilities of the Proponent, contractors and workers for the proposed project.

Table 2: Roles and Responsibilities

ROLE	RESPONSIBILITIES
ENVIRONMENTAL COMPLIANCE OFFICER (ECO)	The Ministry of Environment, Forestry and Tourism (MEFT) is the overseer of environmental protection. The ECO shall be an appointed Environmental Officer from the Directorate of Environmental Affairs trusted to impose compliance. The ECO may carry out inspections and monitoring any time to ensure compliance.

<p>PROPONENT OR PROPONENT'S REPRESENTATIVE</p>	<ul style="list-style-type: none"> ○ Overall responsibility for the implementation, administration and management of this EMP; ○ Responsible for providing the required resources (including financial and technical) for all responsibilities; ○ Employ Managers such as a Project Manager and/or a Site Manager; ○ Guarantee that all employees, contractors and visitors get inductions on environmental measures as defined in the scoping and EMP reports and safety measures as compiled by the proponent. ○ Ensure the environmental rules are communicated to all personnel and that all staffs, contractors, visitors understand comply with the EMP.
<p>PROJECT/SITE MANAGER</p>	<ul style="list-style-type: none"> ○ Ensure all employees and contractors take part in a site induction procedure before they commence work. ○ Keep community concerns and issues register. ○ Keep records of complaints; ○ Ensure that greatest environmental practice is carried out throughout the duration of the project; and report any non-compliance or accidents to the authority. ○ Responsible for compliance with this EMP, oversee all day to day activities during the duration of the project, including routine and non-routine

	<p>maintenance works, and decommissioning;</p> <ul style="list-style-type: none"> ○ Make sure enough resources are available for the execution of this EMP; ○ Ensure that all employees, contractors and visitors to the site are familiar with the requirements of this EMP, significant to their roles at all times; ○ Responsible for environmental awareness and management training and site inductions for all employees, contractors and visitors; ○ Monitor everyday tasks and ensure devotion by employees to the EMP; ○ Receive, respond to and record complaints; and ○ Report any non-compliance or accidents to the proponent. ○ Accountable for management, maintenance and review of the Environmental Management Plan.
<p>Personnel (and contractors and visitors)</p>	<ul style="list-style-type: none"> ○ Accountable for reporting incidents, accidents, tasks and conditions/issues that differ from the EMP or that are not complying immediately to their supervisor; ○ Responsible for complying and adhering to this EMP for the duration of the project ○ Attend site inductions when required to do so; and ○ Ensure that enough information on activities, roles are provided and understood. ○ Ensure to wear personal protective clothing at all time when working;

3.2 Chance Finds Procedures

Archaeology Chance Finds Procedure (CFP) Implementation Roles. The following personnel have been assigned responsibilities as per the Chance Finds procedure:

Actions:

Action by person identifying archaeological or heritage material: Stop work immediately, identify the site with flag, and mark GPS position, and report discoveries to foreman,

Action by Foreman: report findings, site locality and actions taken to Project/Site Managers and Proponent cease any work in close area

Action by Project/Site Managers and Proponent: Visit the site and determine whether work can proceed without damage to discoveries, mark the boundary, wait for confirmation by archaeologist.

Action by archaeologist: Inspect site, give advice to National Heritage Council and request permission in writing to take out or remove discoveries from work area, wrap and tag the discoveries for relocation to National Museum.

3.3 Employment

The proponent shall make sure that local people have access to information about job opportunities; and that the unemployed living in the local area are considered first for employment positions; the total number of job opportunities shall be made known together with the related skills and qualifications; the employing process should be clearly explained and communicated; the duration of the employment shall be clearly specified; and staffs with no proof of permanent residence shall not be employed.

3.4 Contractors

All contractors that will be appointed during the exploration project should ensure that correct actions are taken to report all likely environmental hazards and cases/incidents to the Project Manager; carry-out activities in accord with this EMP and related policies, procedures, management plans, legislative requirements; and executing suitable environmental management measures.

3.5 Disciplinary Actions

Non-compliance to the EMP shall result in disciplinary legal action such as:

- Suspension of work;
- Monetary penalties.

The disciplinary action shall be determined as per the provision of EMA and relevant statutory framework. Under Section 27 (4), Any person who contravenes subsection (3) commits an offence and is on conviction liable to a fine not exceeding N\$500 000 or to imprisonment for a period not exceeding 25 years or to both such fine and such imprisonment".

4. TRAINING AND COMMUNICATIONS

4.1 Emergency Response Services

All employees will be made aware of the below emergency response numbers. These numbers will be posted on each site and made available in every company vehicle.

Table 3: Emergency Contact Numbers

TOWN	POLICE	AMBULANCE	HOSPITAL/CLINIC
Opuwo	065 27 3041 065 273 148	065 27 0326	065 272 800 065 27 3026

4.2 Communication and Training

At all times during the exploration, the Project Manager shall communicate all environmental issues to the project team through audits, site inductions, site inspections; information on incident response actions; and meetings on specific environmental issues.

All Stakeholders should be aware of all possible impacts and how to reduce them. It is important to ensure that all stakeholders are well informed frequently and properly trained on functioning measures as required. All employees employed on the project shall be knowledgeable to execute responsibilities that are likely to cause an environmental impact.

All the workers involved in the project should understand why the environment needs to be protected, including the social aspects involved, how the exploration activities can impact the environment and possible mitigation measures.

This EMP should be given/distributed to Staffs and all contractors working on the exploration site to make sure that the environmental requirements are effectively communicated. Delicate tasks shall be communicated to workers and contractors.

Discussions among the management will take account of any complaints received and actions to resolve them, incidents and responses, assessments, audits and any goal achievements.

4.3 Induction

Inductions are vital information session that helps to familiarize people with the locations, equipment, materials, processes and tasks they may encounter while working at or visiting a site for the first time.

To achieve the best results, inductions need to be tailored and targeted. They should accommodate all workers (i.e. employees, contractors, trainees).

Workers shall require a refresher if:

- They have been absent for some time
- The work environment is different to that normally encountered (e.g. switching to night shift for first time).

4.3.1 Site inductions

Site inductions shall ensure that staffs receive appropriate information and, before commencing work, can recognize the hazards on site that can harm them. Workers should also understand the control measures in place to protect themselves from the hazards/incidents.

Induction requirements shall be determined using information sourced from:

- Legislative requirements
- Site specific competency and training needs analysis
- Standards applicable to site.

All site inductions shall contain an assessment to ensure the required knowledge has been retained by worker. It is important to examination the site's induction regularly to determine if the content is still related.

Site inductions shall include a formal program that provides workers with an understanding of:

- Site layout including emergency assembly points
- Emergency contact numbers
- The obligations of the proponent and employees
- Common likely incidents on the site and their control measures
- Basic environmental management principles to reduce negative impacts and tools used on site
- Reporting processes for incidents; and
- The standard behavior expected of workers on sites

4.4 Complaint Register

The personnel shall be informed about the complaints register, its location and the person responsible for keeping it, in order to refer residents or the public who wish to lodge a complaint. The complaints register shall be kept for the entire period of the project; and will be made available for government or public review upon request. It is the duty of the Project Manager to maintain a complaint register that has details of the names of the complainant, date and time of the complaint and actions taken to resolve the issues. The complainant shall be informed in writing of the results of the investigation and actions to be taken to rectify or address the matters.

4.5 Environmental Inspections and Compliance Monitoring

The Project Manager shall be responsible to ensure that this EMP is adhered to and complied with at all times throughout their daily roles; and to make sure that pollution control measures are adhered to. Daily, weekly and monthly inspections will be carried out.

5. ENVIRONMENTAL MANAGEMENT PLAN (EMP)

The general objective of the management actions of the EMP is to minimize the waste generation, low to zero contamination cases, minimal clearing of vegetation and earthworks, safeguard indigenous flora and fauna; and ensure least disruption to activities in the nearby farms.

The scope of this EMP is with reference to the EA of the exploration activities for Base and Rare metals, and decommissioning phase of the proposed project. This EMP is designed by considering environmental, social, safety and occupational health characteristics related with this proposed exploration project.

The following provisions of the EMP shall apply to planning, construction and operation phases.

Table 4: Environment: Environmental Mitigation Measures to be implemented

POTENTIAL IMPACT	MITIGATION MEASURE	MONITORING REQUIREMENTS	RESPONSIBILITY
BIODIVERSITY LOSS/HABITAT DESTRUCTION	<ul style="list-style-type: none"> *Employees should not be allowed to cut and collect firewood. *Employees should not be allowed to catch fish in the river. * Provide electricity or gas to workforce for cooking and heating to discourage firewood collecting. * Promote re-vegetation in cleared areas when the exploration activities will come to an end. *No animals must be killed unless it poses danger. 	DAILY	PROJECT/SITE MANAGER EMPLOYEES, CONTRACTORS

	<p>*No domestic animals should be allowed at the site.</p> <p>*Prevent the destruction of protected species by minimizing clearance areas through proper planning of the proposed exploration activities.</p> <p>* Where possible, rescue and relocate plants of significance.</p>		
SOIL EROSION	<p>*Where possible, vegetation will be cut at ground level, leaving the root system intact so as to limit soil erosion.</p> <p>*Land clearing will be conducted in a way that limits topsoil disturbances</p> <p>*Land will be reclaimed as soon as possible and when that is done, topsoil will be replaced on cleared areas.</p> <p>* Movement of all vehicles must strictly be within the project site;</p>	WEEKLY	PROJECT/SITE MANAGER,

	<p>*Sand and gravel loads from exploration trenches should be placed in designated areas;</p> <p>*Rehabilitate all sites upon completion of the project;</p> <p>*Exploration activities should be limited to potential targeted sites only in the Mining claim.</p>		
NOISE DISTURBANCE	<p>* Personnel must NOT be exposed to noise levels above the required 85dB, earmuffs must be provided.</p> <p>* All vehicles and machinery/equipment to be shut down between periods of use.</p> <p>*Noise nuisance shall monitored according</p> <p>* Residents shall be provided at least two (2) weeks notice of drilling procedures within 1 km of their property.</p> <p>*If possible, use exploration equipment with low noise emission.</p>	<p>DAILY</p> <p>OR AS APPROVED BY MANAGEMENT</p> <p>NB: PUBLIC COMPLAINTS MUST BE RECORDED</p>	<p>PROJECT/SITE MANAGER, EMPLOYEES, CONTRACTOR</p>
	<p>*Specific activities that may generate dust and impact on residents must be avoided during high wind events.</p>		

<p>EMISSIONS AND DUST</p>	<p>*Monitoring stages of dust produced by project associated with vehicles dust control activities.</p> <p>*Limit vehicle speeds on roads to 30km/h.</p> <p>*During dry periods of the year, when the surface of roads are likely to cause significant dust, The proponent will take effective steps to reduce dust.</p> <p>* Gravel or sand loads must be covered or frequently sprayed with water;</p> <p>*All vehicles and machinery/equipment to be shut down between periods when not in use.</p> <p>*Measures that may be utilized to control dust include: 1) Routine watering of roads and work sites; 2) Application of dust suppressants as a longer term solution to road dust.</p> <p>*Use existing access roads and paths where possible.</p>	<p>DAILY, WEEKLY</p> <p>NB: PUBLIC COMPLAINTS MUST BE RECORDED DAILY, WEEKLY</p>	<p>PROJECT/SITE MANAGER, EMPLOYEES, CONTRACTOR</p>
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	<p>* Non-toxic human dust exposure levels may not exceed 5mg/m³ for respiratory dust and 15mg/m³ for dust in total as per Labour Act.</p> <p>*Engines must be switched off when vehicles are not in use.</p>		
SURFACE AND GROUNDWATER CONTAMINATION	<p>*Consider other sites when the water table is too high.</p> <p>*Drill structures should be dug to direct any unintended spills into sumps.</p> <p>*Waste water shall be contained.</p> <p>*Water from existing water sources shall be used in agreement with the owners of farms in the area,</p> <p>* Heavy drilling equipment should be carefully checked for leakages; and if refuelling is taking place on site it must either be on a tank mounted on stilts to prevent any leakage and contamination.</p>	DAILY/WEEKLY	PROJECT/SITE MANAGER, EMPLOYEES, CONTRACTOR

<p>SOIL AND WATER CONTAMINATION</p>	<p>* For any spills and leaks, contaminated soils must be collected and disposed of at an approved local site.</p> <p>*All still vehicles and equipment must have drip trays to collect leakages of lubricants and oil.</p> <p>*Spills and leaks to be cleaned immediately.</p>	<p>DAILY, WEEKLY</p>	<p>EMPLOYEES, CONTRACTOR, PROJECT/SITE MANAGER</p>
<p>WASTE GENERATION</p>	<p>*Implement a standard waste management procedure for all types of wastes.</p> <p>*Waste should be disposed of at approved disposal sites only.</p> <p>*Recycle and Re-use where possible.</p> <p>*Wastewater should be contained and not disposed on site.</p> <p>*Provide temporary toilets in the ratio of 1:15 and 1:30 for females and males; and effluent to be disposed of at the nearest local waste water treatment plant.</p> <p>*Functional toilets shall be on site.</p>	<p>DAILY</p> <p>Wheelie bins and skip containers must be provided on site.</p>	<p>EMPLOYEES, CONTRACTOR, PROJECT/SITE MANAGER</p>

	<p>*No waste should be buried on site or in the surrounding areas.</p> <p>*Hazardous waste shall not be allowed on site</p>	Record effluent disposal	
SAFETY & HEALTH	<p>*Every employee must be provided with Personal Protective Equipment (PPE), ear smuffs, etc which must be worn at all times during working hours and/or when on site.</p> <p>* A required safety induction training course shall be given to all personnel.</p> <p>*The Proponent shall develop a health and safety</p> <p>*Clear health and safety signs at every selected areas, marked “ENTRANCE, EXIT, ASSEMBLY POINTS, DANGER ZONE, NO ENTRY, STAFF ONLY, etc.</p>	AS CERTIFIED BY THE APPROVED PERSONNEL (VISUAL SIGNS)	MANAGEMENT, EMPLOYEES & CONTRACTORS
ALIEN INVASIVE	*All alien invasive should be cleared out.	AT THE END OF THE EXPLORATION.	PROJECT/SITE MANAGER/ CONTRACTOR/ EMPLOYEES
VISUAL AND SENSE OF PLACE	*The proponent to ensure that rehabilitated areas		PROPONENT/ PROJECT/SITE MANAGER/

	<p>balance in well with the natural environment.</p> <p>*Upon completion of the exploration, overburdens should be placed in the trenches and excavated areas and be levelled as part of the rehabilitation.</p>	<p>AT THE END OF EXPLORATION.</p>	<p>CONTRACTOR/ EMPLOYEES</p>
<p>WATER ABSTRACTION</p>	<p>*A valid water abstraction permit should be obtained from the MAWLR.</p> <p>* Observe and control water usage and minimise unnecessary use where necessary.</p> <p>*Re-use and Recycle water where possible.</p> <p>*Pollution or any noxious waste should not be allowed to enter the freshwater ecosystem.</p>	<p>OBTAIN A VALID WATER ABSTRACTION PERMIT (where required)</p>	<p>MANAGEMENT</p>
<p>EMPLOYMENT</p>	<p>*Hire local contractors.</p> <p>*Reasonable wages, compensation; and labour practise as per Namibian Labour Laws must be followed.</p> <p>* All general work must be set aside for local people except in positions requiring specialized skills.</p>		<p>PROPONENT/ PROJECT/SITE MANAGER</p>

6. REHABILITATION AND DECOMMISSIONING

It will be the legal responsibility of the Proponent to carry out the rehabilitation and decommissioning exercise, which will be done as per the proponent's decommissioning & rehabilitation Plan.

The Proponent will make certain that the footprint of Project activities is minimized throughout the processes and completely remediated following the end of operations.

An all-inclusive rehabilitation and decommissioning implementation should be done by the proponent, which should include the following:

- Demolishing and removal of all temporary and permanent structures;
- A site cleanup shall be accomplished prior to land recovery. This will include the removal of all litter, barrels, cans, drums, contaminated materials from accidental spills and any other work refuse or excess materials, disturbed areas to be prepared accordingly;
- Retrieval of the topsoil;
- Any building rubble shall be disposed of at the local dumpsite/landfill; and
- The rehabilitation monitoring should be done respectively.