

**ENVIRONMENTAL ASSESSMENT (EA) FOR SIZE  
AMENDMENT AND SUBSEQUENT EXPLORATION AND TEST  
MINING ACTIVITIES ON THE EXCLUSIVE PROSPECTING  
LICENSE (EPL) NO. 7285 LOCATED NEAR HENTIES BAY,  
ERONGO REGION, NAMIBIA**

**ENVIRONMENTAL MANAGEMENT PLAN – FINAL**

**ECC Application Reference: APP-001575**

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## TABLE OF CONTENTS

<b>LIST OF FIGURES</b> .....	2
<b>LIST OF TABLES</b> .....	2
<b>1 INTRODUCTION</b> .....	3
1.1 Project Background .....	3
1.2 Aim of the Draft Environmental Management Plan (EMP) .....	5
1.3 Appointed Environmental Assessment Practitioner .....	6
1.4 Details of the Project Proponent.....	6
1.5 Environmental Assessment Legal Requirements .....	7
1.6 Draft EMP Limitations .....	10
<b>2 EMP ROLES AND RESPONSIBILITIES</b> .....	12
2.1 Management of Key Potential Environmental Impacts .....	13
2.2 Aim of the EMP Actions .....	14
2.3 Operation Phase Management Action Plans .....	15
2.4 Monitoring Phase Management Action Plans .....	21
2.5 Decommissioning and Rehabilitation Phase .....	28
<b>3 ENVIRONMENTAL MONITORING</b> .....	30
<b>4 CONCLUSION</b> .....	30

## LIST OF FIGURES

Figure 1: Location of the EPL No. 7285 and the amended area near Henties Bay, in the Erongo Region .....	4
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## LIST OF TABLES

Table 1: Proponent contact details and purpose of the required ECC .....	6
Table 2: Applicable legal requirements and permits to the exploration, sampling and waste dumps mining/test mining activities on EPL 7285.....	7
Table 3: Summary of key potential environmental impacts per project phase .....	13
Table 4: Management action plans for the Operation and Maintenance Phase .....	15
Table 5: Management action plans for the Monitoring Phase .....	21

# 1 INTRODUCTION

## 1.1 Project Background

Kambwa Mining CC (hereinafter referred to as The Proponent), a holder of the exclusive prospecting license (EPL 7285) granted by the Ministry of Mines and Energy (MME) intends to acquire an Environmental Clearance Certificate (ECC) to be able to conduct exploration and test mining activities on the amended EPL. The Proponent focuses on the acquisition, exploration and development of base and rare metal projects. EPL 7285 is covering a traditional mining area for semi-precious stones, tin, tantalum and lithium. Several old mines such as Molopo Petalite, Strathmore North and Strathmore South (the “Dead Sea”) are located within the EPL and/or next to the license area. The locality map of the license where exploration work will be undertaken is shown in **Figure 1**.

The Proponent has submitted an application to the MME for the size increase of the EPL 7285 as per the Section 73(1) (a) of the Minerals (Prospecting and Mining) Act No. 33 of 1992:

*73. (1) Subject to the provisions of subsection (2), the holder of an exclusive prospecting license may apply for the amendment of such license –*

*(a) by the extension or reduction or the extension and reduction of the prospecting area to which such license relates.*

In terms of Section 27 (1) of the Environmental Management Act (EMA), No. 7 of 2007, in line with Section 32-37 of the Environmental Management Act as stipulated in the Gazette of 2012, indicating the listed activities that may not be carried out without an Environmental Impact Assessment (EIA) being undertaken and Environmental Clearance Certificate (ECC) being obtained. The relevant listed activities as per EIA regulations are:

- *3.1 The construction of facilities for any process or activities which requires a license, right of other forms of authorization, and the renewal of a license, right or other form of authorization, in terms of the Minerals (Prospecting and Mining Act, 1992).*
- *3.2 other forms of mining or extraction of any natural resources whether regulated by law or not.*
- *3.3 Resource extraction, manipulation, conservation and related activities.*

It is therefore important that the relevant listed activities must adhere to the Regulations of the Environmental Impact Assessments, as stipulated in section 56 of the EMA. Subsequently, the

Proponent appointed Excel Dynamic Solutions (Pty) Ltd, an independent team of Environmental Consultants to conduct the required EA process and submit the ECC application to the Ministry of Environment, Forestry and Tourism as required by Section 30 (1) of the Environmental Management Act on behalf of the Proponent. This statutory document has been prepared as a requirement by Section 8 of the Environmental Management Act (EMA), No. 7 of 2007 and its 2012 Regulations. The compilation of this EMP was also conducted as one of the requirements presented to EDS by the Proponent. Therefore, it is required from an Environmental Consultant (Environmental Assessment Practitioner (EAP)) to comply with the Environmental Management Act and provide for the following:

- Carry out an explicit Environmental Management Plan as a guideline to monitor compliance to the recommendations stipulated in the EIA and to assist in managing and monitoring activities throughout the operation and maintenance of the proposed exploration, sampling and waste dumps mining/test mining activities.
- Furthermore, the Environmental Consultant must clearly elucidate in the EMP the roles and responsibilities of the Proponent, the contractors and any other identified stakeholders.

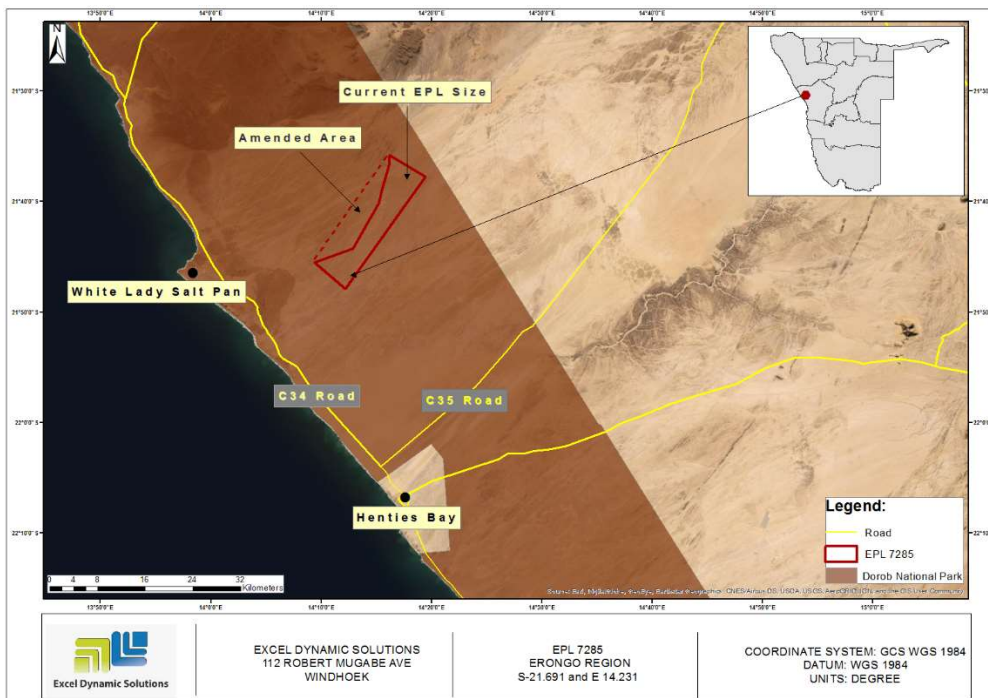


Figure 1: Location of the EPL No. 7285 and the amended area near Henties Bay, in the Erongo Region

## 1.2 Aim of the Draft Environmental Management Plan (EMP)

Regulation 8 of the EMA, 2007 and its EIA Regulations (2012) requires that a draft EMP be included as part of the Scoping Environmental Assessment (EA) process. A ‘**Management Plan**’ is defined as:

*“...a plan that describes how activities that may have significant effects on the environment are to be mitigated, controlled and monitored.”*

An EMP is one of the most important outputs of the EA process as it synthesizes all of the proposed mitigation and monitoring actions, set to a timeline and with specific assigned responsibilities. It provides a link between the impacts identified in the EIA process and the required environmental management on the ground during project implementation and operation. It is important to note that an EMP is a statutory document and a person who contravenes the provisions of this EMP may face imprisonment and/or a fine. This EMP is a living document and should be amended to adapt to address project changes and/or environmental conditions and feedback from compliance monitoring.

The purpose of this document is to provide a guideline to environmental management throughout the different phases of the proposed development, namely: operation and maintenance; and decommissioning phases:

- **Operation and Maintenance** – This is the current phase of the exploration, sampling and waste dumps mining/test mining and related activities. It is also the phase during which maintenance of the site, equipment and machinery is done by the Proponent.
- **Environmental Monitoring Requirements**- In order to ensure that the desired results are achieved and supported by the proposed mitigation measures; a monitoring plan must be implemented alongside the mitigation plans. Bi-annual environmental performance and annual environmental audit reports should be produced.
- **Decommissioning and Rehabilitation** – This is the phase during which the exploration, and waste dumps mining activities on the EPL 7285 will come to an end. Decommissioning of the operation will be considered due to a number of factors, including poor exploration results, or a decline in the target commodities market price etc. During the operational phase and before decommissioning, the Proponent will need to put site rehabilitation measures in place.

This draft EMP will be used by the Proponent, employees and/or contractors to provide management measures to be undertaken during the exploration and related activities work, to address the impacts on the environment that have been identified in the Environmental Assessment Report; and to ensure that the impacts on the environment are avoided or limited if they cannot be avoided completely.

### 1.3 Appointed Environmental Assessment Practitioner

In order to satisfy the requirements of the EMA and its 2012 EIA Regulations, the Proponent appointed Excel Dynamic Solutions Pty Ltd (Consultant hereafter) to conduct the required EIA process on their (Proponent's) behalf. The findings of the EIA process are incorporated into this report and the draft Environmental Management Plan (EMP) will be submitted as part of an application for an ECC to the Environmental Commissioner at the Department of Environmental Affairs (DEA) in the Ministry of Environment, Forestry and Tourism (MEFT) and the Ministry of Mines and Energy.

The EIA project is headed by Mr. Nerson Tjelos, a qualified and experienced Geoscientist and experienced EAP. The consultation process and reporting are done by Ms. Althea Brandt with support from Mr. Silas David. Mr. Nerson Tjelos contributed to the report writing and review. Dr. Peter Schreck has provided some geological and mineralisation input, whereas the ecological assessment for the EPL was done by Ms. Grace Shihepo.

### 1.4 Details of the Project Proponent

The details of the Proponent are presented in **Table 1** below.

**Table 1: Proponent contact details and purpose of the required ECC**

Full name of Proponent	Contact number	Postal Address	ECC Application for:
Kambwa Mining CC	Telephone: +264 65 252 266/+264 81 129 5951  Email Address: <a href="mailto:david@kambwa.com">david@kambwa.com</a>	P.O Box 318 Okahao Namibia	Environmental Assessment (EA) for EPL 7285 Resizing and subsequent Exploration and/or Test Mining Operation

## 1.5 Environmental Assessment Legal Requirements

The content of the EMP must meet the requirements Section 8 (j) of the EIA Regulations. The EMP must address the potential environmental impacts of the proposed activities on the environment throughout the project life-cycle. It must also include a system for assessment of the effectiveness of monitoring and management arrangements after implementation.

The Proponent therefore has the responsibility to ensure that the exploration, sampling and test mining activities as well as the EIA process conform to the principles of EMA and must ensure that employees act in accordance with such principles. **Table 2** below lists the requirements of an EMP as stipulated by Section 8 (j) of the EIA Regulations, primarily on specific approvals and permits that may be required for the exploration, sampling and test mining activities.

**Table 2: Applicable legal requirements and permits to the exploration, sampling and waste dumps mining/test mining activities on EPL 7285**

Legislation/Policy/ Guideline	Relevant Provisions	Implications for this project
Environmental Management Act EMA (No 7 of 2007)	Requires that projects with significant environmental impacts are subject to an environmental assessment process (Section 27).  Details principles which are to guide all EAs.	The EMA and its regulations should inform and guide this EA process.  Should the ECC be issued to the Proponent, it should be renewed every 3 years, counting from the date of issue.
Environmental Impact Assessment (EIA) Regulations GN 28-30 (GG 4878)	Details requirements for public consultation within a given environmental assessment process (GN 30 S21).  Details the requirements for what should be included in a Scoping Report (GN 30 S8) and an Assessment Report (GN 30 S15).	Contact details at the Department of Environmental Affairs (DEA), Ministry of Environment, Forestry and Tourism (MEFT)  Contact person(s) at MEFT and their details:  <b>Mr. Damian Nchindo or Mr. Josafat Hiwana</b> (Chief and Senior Conservation Scientists)

Legislation/Policy/ Guideline	Relevant Provisions	Implications for this project
		and EIA Report Reviewers/evaluators) Tel: +264 61 284 2717 / +264 61 284 2962 Email: <a href="mailto:damian.nchindo@met.gov.na">damian.nchindo@met.gov.na</a> and <a href="mailto:josafat.hiwana@met.gov.na">josafat.hiwana@met.gov.na</a> , respectively
Minerals (Prospecting and Mining) Act (No. 33 of 1992)	Section 48 (3): In order to enable the Minister to consider any application referred to in section 47 the Minister may (b) require the person concerned by notice in writing to (i) carry out or cause to be carried out such environmental impact studies as may be specified in the notice.  Section 54 (2): details provisions pertaining to the decommissioning or abandonment of a mine	The Proponent needs to conduct an EA for their proposed operations. Furthermore, the Proponent needs to plan rehabilitation actions for future mine decommissioning. The Proponent should ensure that all the necessary permits/authorisation for this scale of mining (if any) are obtained from the Ministry of Mines and Energy (MME)  Contact person and details at the MME (Mining Commissioner)  <b>Mr. Erasmus Shivolo</b> Tel: +264 61 284 8167 Email: <a href="mailto:Erasmus.Shivolo@mme.gov.na">Erasmus.Shivolo@mme.gov.na</a>
Petroleum Products and Energy Act	Regulation 3(2)(b) states that "No person shall possess [sic] or store any fuel except under	The Proponent should obtain the necessary authorisation



Legislation/Policy/ Guideline	Relevant Provisions	Implications for this project
(No. 13 of 1990) Regulations (2001)	authority of a licence or a certificate, excluding a person who possesses or stores such fuel in a quantity of 600 litres or less in any container kept at a place outside a local authority area”	form the MME for the storage of fuel on-site.  <b>Carlo Mcleod</b> (Ministry of Mines and Energy: Acting Director – Petroleum Affairs)  Tel: +264 61 284 8291
Labour Act 11 of 2007  Health and Safety Regulations (HSR) GN 156/1997 (GG 1617).	Adhere to all applicable provisions of the Labour Act and the Health and Safety regulations.	<b>Division of Labour Services</b> at the Ministry of Labour, Industrial Relations and Employment Creation.  Tel: +264 61 206 6111
Forestry Act 12 of 2001, Amended Act 13 of 2005	Prohibits the removal of any vegetation within 100 m from a watercourse (Forestry Act S22 (1)). The Act prohibits the removal of and transport of various protected plant species.	Should there be protected plant species, which are known to occur within the project sites, these are required to be removed, a permit should be obtained from the nearest Forestry office (Ministry of Environment, Forestry and Tourism (MEFT)) prior to removing them.  Contact Details at MEFT (Director of Forestry)  <b>Mr. Joseph Hailwa</b>  Tel: +264 61 208 7663  Email: <a href="mailto:Joseph.Hailwa@mawf.gov.na">Joseph.Hailwa@mawf.gov.na</a>

Legislation/Policy/ Guideline	Relevant Provisions	Implications for this project
National Heritage Act No. 76 of 1969	Call for the protection and conservation of heritage resources and artefacts.	<p>Should any archaeological material, e.g. bones, old weapons/equipment etc be found on the EPL 7285, work should stop immediately and the National Heritage Council of Namibia must be informed as soon as possible. The Heritage Council will then decide to clear the area or decide to conserve the site or material.</p> <p>Contact Details at National Heritage Council of Namibia</p> <p><b>Mr. Salomon April or Dr. Alma Nankela</b></p> <p>Tel: +264 81 244 375</p>
Road traffic and transport Act 52 of 1999 and its 2001 Regulations	Provides for the control of traffic on public road and the regulations pertaining to road transport, including the licensing of vehicles and drivers.	<p><b>Eugene de Paauw</b> (Roads Authority- specialist Road legislation)</p> <p>Tel: +264 61 284 7072</p>

## 1.6 Draft EMP Limitations

This EMP has been drafted with the acknowledgment of the following limitations:

- This EMP has been drafted based on the EIA conducted for the size increase and subsequent exploration, sampling and test mining activities on the EPL 7285 located near Henties Bay town in the Erongo region. A detailed ecology specialist study is included as part of the environmental assessment. No other specialist studies were done.
- The mitigation measures recommended in this EMP document are based on the risks/impacts in the EIA Report which were identified based on the project description as

provided by the Proponent, site investigations and the input from Dr. Peter Schreck (Geoscientist) who has done geological mapping and an economic assessment of the EPL area. Should the scope of the proposed project change, the risks/impacts will have to be reassessed and mitigation measures provided accordingly.

The following section presents the project's roles and responsibilities to be assigned as deemed necessary by the Proponent pertaining to the implementation of this document.

## 2 EMP ROLES AND RESPONSIBILITIES

The Proponent is ultimately responsible for the implementation of the EMP. Alternatively, the Proponent may delegate this responsibility at any time, as they deem necessary during the project phases. The roles and responsibilities of all delegates/parties involved in the effective implementation of this EMP are set out below:

**Competent and Monitoring authority (Ministry of Environment, Forestry and Tourism: Department of Environmental Affairs (DEA)):** - Responsible for enforcing compliance with the EMA Act, its regulations and full implementation of this EMP. The competent authority also reviews biannual reports and grant ECC renewal after 3 years following annual environmental Audits as stipulated in the **National Policy on Prospecting and Mining in Protected Areas (2018)**

**Proponent's Representative (PR):** If the Proponent does not personally manage all aspects of operation and maintenance phase activities, decommissioning and rehabilitation, referred to in this EMP, they should assign this responsibility to a suitably qualified individual referred to in this plan as the Proponent's Representative (PR). The Proponent may decide to assign the role of a PR to one person for both phases or a PR may be appointed to manage the EMP aspects for each project phase. The PR's responsibilities include:

- Managing the implementation of this EMP and updating and maintaining it when necessary.
- Management and monitoring of individuals and/ or equipment on-site in terms of compliance with this EMP.
- Issuing fines for contravening EMP provisions.

**Site Project Manager (as appropriate):** This individual(s) will be responsible to ensure that the exploration, sampling and waste dumps mining/test mining activities are completed on time as per the expectations of the Proponent. The manager's duties and responsibilities will include:

- Ensure that the relevant commitments contained in the EMP Action Plans are adhered to.
- Ensure relevant staff is trained in procedures.
- Maintain records of all relevant environmental documentation.
- Reviewing the EMP annually and amending the document when necessary.

- Issuing fines to individuals who may be in breach of the EMP provision and if necessary, removing such individuals from the site.
- Cooperate with all relevant interested and affected parties/ stakeholders.
- Development and management of schedules for daily activities.

Alternatively, the Proponent may delegate an external/ internal Environmental Officer (ECO) or Safety, Health and Environmental (SHE) Officer to ensure EMP compliance throughout the project life cycle.

**Environmental Control Officer (ECO) or Environmental, Health, Safety (EHS) Officer:** The Proponent should assign the responsibility of overseeing the implementation of the whole EMP to a designated member of staff or external qualified and experienced person, referred to in this EMP as the Environmental Control Officer (ECO) or SHE Officer. The ECO will have the following responsibilities:

- Management and facilitation of communication between the Proponent, PR and Interested and Affected Parties (I&APs) with regard to this EMP.
- Conducting site inspections (recommended frequency is monthly during the operation phase and bi-annually for the operation and maintenance) of all areas with respect to the implementation of this EMP (monitor and audit the implementation of the EMP).
- Advising the PR on the removal of person(s) and/or equipment not complying with the provisions of this EMP.
- Making recommendations to the PR with respect to the issuing of fines for contraventions of the EMP.
- Undertaking monthly/bi-annual/ annual reviews of the EMP and recommending additions and/or changes to this document.

## 2.1 Management of Key Potential Environmental Impacts

From the assessment conducted, the following key potential negative impacts have been identified per project phase and are summarized in **Table 3** below.

**Table 3: Summary of key potential environmental impacts per project phase**

	Project Phase	Potential negative impacts identified in the EA
1	Operation and maintenance	Health and safety, visual, waste, noise.

	<b>Project Phase</b>	<b>Potential negative impacts identified in the EA</b>
		The monitoring of exploration and mining work impact in remote locations can be problematic due to long distance and telecommunication challenges.
2	Decommissioning and Rehabilitation	Loss of employment by workers at the mining site and contribution to the national economy.

## 2.2 Aim of the EMP Actions

The aim of the management actions of the EMP is to avoid potential negative impacts where possible. Where impacts cannot be avoided, measures are provided to reduce the significance of these impacts.

Management actions recommended for the potential impacts rated in the EIA carried out for the exploration, sampling and waste dumps mining/test mining activities were based on the three project phases listed below:

- Operation and Maintenance phase (**Table 4**)
- Monitoring (**Table 5**)
- Decommissioning and Rehabilitation

### 2.3 Operation Phase Management Action Plans

The management action plans recommended for this phase are presented in **Table 4** below.

**Table 4: Management action plans for the Operation and Maintenance Phase**

Environmental Feature	Impact	Management Actions	Responsible person(s) / Implementation responsibility	Timeframe (When?)
EMP training	Lack of EMP awareness and the implications thereof	<ul style="list-style-type: none"> <li>All personnel should be educated about the necessary health, safety and environmental considerations applicable to their respective works.</li> </ul>	Proponent: ECO/SHE Officer	<p>Prior to site setup activities</p> <p>Ongoing</p>
Monitoring	EMP non-compliance	<ul style="list-style-type: none"> <li>The implementation of this EMP should be monitored.</li> <li>An EMP non-compliance penalty system should be implemented on site</li> </ul>	Proponent: ECO/SHE Officer	During the course of the exploration, sampling and waste dumps mining/test mining phase
Biodiversity	Loss of biodiversity	<ul style="list-style-type: none"> <li>Vegetation found on the site, but not in the targeted areas within the EPL 7285 should not be removed, but left to preserve biodiversity on the site.</li> <li>Even if a certain shrub is found along target exploration areas within the EPL 7285, this does not mean that it should be removed. Therefore, care should be taken when exploration, sampling and conducting waste dumps mining/test mining without destroying the vegetation.</li> </ul>	ECO/SHE Officer/ Site Manager/ Personnel	During the course of the exploration, sampling and waste dumps mining/test mining phase

Environmental Feature	Impact	Management Actions	Responsible person(s) / Implementation responsibility	Timeframe (When?)
		<ul style="list-style-type: none"> <li>• Where vegetation clearing and/or damage is unavoidable, permits for clearing protected plant species should be obtained from the nearest Forestry office. These permits can be obtained either from the Erongo Forestry office.</li> <li>• Environmental awareness on the importance of biodiversity preservation should be provided to the workers.</li> <li>• Personnel should refrain from damaging or cutting down vegetation that is not within the EPL site footprints and not necessarily require removal for the proposed activities.</li> <li>• The movement of vehicles and machinery should be restricted to existing roads and tracks to prevent unnecessary damage to the vegetation.</li> <li>• No personnel are allowed to without permission cut down or damage shrubs</li> <li>• It is envisaged that all the plant species found within the project area are not unique to the specific to the site and their distribution is regional</li> <li>• Cordon off the project area and restrict all activities within the demarcated mining area.</li> </ul>		
Air Quality	Generation of dust	<ul style="list-style-type: none"> <li>• Exploration, sampling and waste dumps mining/test mining schedule should be limited to between 08h00 and</li> </ul>	Proponent Manager / SHE Officer	During the course of the



Environmental Feature	Impact	Management Actions	Responsible person(s) / Implementation responsibility	Timeframe (When?)
	and emissions of hydrocarbons from vehicles	17h00 in order to keep the vehicle-related to dust level minimal in the area. <ul style="list-style-type: none"> <li>• Vehicles and machinery on site should be serviced regularly to prevent emission of harmful gases.</li> <li>• Vehicle and machinery on site should be serviced regularly to prevent emission of harmful.</li> </ul>		exploration, sampling and waste dumps mining/test mining phase
Waste Generation	Environmental Pollution	<ul style="list-style-type: none"> <li>• Workers should be sensitized to dispose of waste in a responsible manner and not litter.</li> <li>• After each daily works, the Proponent should ensure that there are no wastes left on site.</li> <li>• All domestic and general operational waste produced on a daily basis should be contained until such that time it will be transported to designated waste sites.</li> <li>• No waste may be buried or burned on site or anywhere else.</li> <li>• The operation site on the EPL should be equipped with separate waste bins for hazardous and general waste/domestic.</li> <li>• A penalty system for irresponsible disposal of waste on site and anywhere in the area should be implemented.</li> </ul>	ECO/Site Manager, Personnel	Throughout the exploration, sampling and waste dumps mining/test mining phase
	Visual		Proponent	During the course of the

Environmental Feature	Impact	Management Actions	Responsible person(s) / Implementation responsibility	Timeframe (When?)
Visual (sense of place)		<ul style="list-style-type: none"> <li>• All the necessary options to improve the aesthetic of the site should be considered and incorporated in the exploration, sampling and waste dumps mining/test mining activities.</li> <li>• The Proponent should consider the implementation of continuous rehabilitation programme, by using overburden waste rocks.</li> </ul>		exploration, sampling and waste dumps mining/test mining phase and ongoing
Potential Health and Safety Risks	Health and safety of the workers	<ul style="list-style-type: none"> <li>• As part of their induction, the workers should be provided with an awareness training of the risks of mishandling equipment and materials on site.</li> <li>• When working on site, employees should be properly equipped with personal protective equipment (PPE) such as coveralls, masks, gloves, safety boots, earplugs, safety glasses, etc.</li> <li>• No employee should be allowed to drink alcohol prior to and during working hours as this may lead to mishandling of equipment which results into injuries and other health and safety risks.</li> <li>• Employees should not be allowed on site if under the influence of alcohol.</li> </ul>	Proponent	Prior to site setup activities and required during exploration, sampling and waste dumps mining/test mining phase

Environmental Feature	Impact	Management Actions	Responsible person(s) / Implementation responsibility	Timeframe (When?)
Soils	Land Degradation	<ul style="list-style-type: none"> <li>• Overburden material (if any) should be handled more efficiently to avoid erosion when subjected erosional processes.</li> <li>• Prevent the creation of huge piles of waste rocks by performing sequential backfilling.</li> <li>• Site soils should not be disturbed, if not needed.</li> <li>• Preventative measures should be put in place to manage soil contamination with spill, not matter how small the amount of pollution (spill) may occur.</li> </ul>	ECO	During the course of the exploration, sampling and waste dumps mining/test mining phase and ongoing
Archaeology and cultural heritage	Potential disturbance to archaeological and cultural heritage resources	<ul style="list-style-type: none"> <li>• The Proponent should consider having a qualified and experience Archaeologist on standby during the entire operational phase. This action will be to assist on the possible of uncovering of sub-surface cultural/heritage objects and advice the Proponent accordingly.</li> <li>• Identified archaeological significant objects on the site should not be disturbed, but are to be reported to the project Environmental officer or National Heritage Council offices.</li> </ul>	ECO	Prior to site setup activities and ongoing observations

Environmental Feature	Impact	Management Actions	Responsible person(s) / Implementation responsibility	Timeframe (When?)
HIV and AIDS	Potential increase of prevalence of HIV and AIDS, as well as other STIs prevalence	<ul style="list-style-type: none"> <li>• The workers should be engaged in health talks and training about the dangers of engaging in unprotected sexual relations which results in contracting HIV/AIDS and other sexual related infections</li> <li>• Provision of condoms and sex education through distribution of Pamphlets. These pamphlets can be obtained from local health facilities.</li> </ul>	SHE Officer	Ongoing
Noise	Nuisance	<ul style="list-style-type: none"> <li>• Noise from operations vehicles and equipment on site should be reduced to acceptable levels.</li> <li>• The exploration/test mining operational times should be set such that, no mining activity is carried out during the night or very early in the mornings.</li> <li>• Mining hours should be restricted to between 08h00 and 17h00 to avoid noise generated by equipment and the movement of vehicles before or after hours.</li> <li>• When operating the drilling machinery onsite, workers should be equipped with personal protective equipment (PPE) such earplugs to reduce noise exposure.</li> </ul>	Proponent	Ongoing

Environmental Feature	Impact	Management Actions	Responsible person(s) / Implementation responsibility	Timeframe (When?)
Employment	Labour recruitment	<ul style="list-style-type: none"> <li>Preference for casual works during operational phase should be given to locals in Henties Bay and surroundings</li> </ul>	Proponent: Human Resources department	

## 2.4 Monitoring Phase Management Action Plans

In order to support and ensure that the proposed mitigation measures are achieving the desired results, a monitoring plan must be implemented. The management action plans recommend for exploration, sampling and waste dumps mining/test mining program are presented in **Table 5** below.

**Table 5: Management action plans for the Monitoring Phase**

Environmental Feature	Impact	Management Actions	Responsible person(s) / Implementation responsibility	Frequent	Threshold	Action if threshold is exceeded
Monitoring	EMP non-compliance	<ul style="list-style-type: none"> <li>The ECO or the Proponent/Contractor should monitor the implementation of this EMP to ensure compliance.</li> <li>The ECO(s) should inspect the site</li> </ul>	ECO / SHE Officer	Daily	Increase in health, safety and environmental damage incidence	Daily safety talks, Remedy the consequences

Environmental Feature	Impact	Management Actions	Responsible person(s) / Implementation responsibility	Frequent	Threshold	Action if threshold is exceeded
		<p>throughout the exploration, sampling and waste dumps mining/test mining period and after completion.</p>				
Health and Safety	Health and safety of the workers	<ul style="list-style-type: none"> <li>• Exploration, sampling and waste dumps mining/test mining workers should be trained on how to handle materials and equipment on site (if they do not already know how to) in order to avoid injuries.</li> <li>• Exploration, sampling and waste dumps mining/test mining ing equipment and materials transported to site should be securely fastened to the vehicles (trucks and cars). This is to ensure</li> </ul>	Proponent: ECO/ Environmental, Health and Safety Officer	Daily / Weekly	Health and safety incident	Remedy the consequences

Environmental Feature	Impact	Management Actions	Responsible person(s) / Implementation responsibility	Frequent	Threshold	Action if threshold is exceeded
		<p>that the materials and equipment do not fall off the vehicles and cause injuries to anyone while transporting them.</p> <ul style="list-style-type: none"> <li>The proponent and ECO/SHE Officer should ensure that all personnel are provided with appropriate personal protective equipment (PPE), such as gloves, masks, safety boots, safety glasses and hard hats at all times during exploration, sampling and waste dumps mining/test mining (operation) hours on site to prevent serious injuries or loss of life</li> </ul>				

Environmental Feature	Impact	Management Actions	Responsible person(s) / Implementation responsibility	Frequent	Threshold	Action if threshold is exceeded
		<ul style="list-style-type: none"> <li>No employee should be allowed to drink alcohol prior to and during working hours as this may lead to mishandling of equipment which results into injuries and other health and safety risks.</li> </ul>				
Soils	Loss of top soil	<ul style="list-style-type: none"> <li>All measures should be considered to prevent the loss of top soil.</li> </ul>	SHE Officer/ Site Manager	weekly	Proliferation of new vehicle tracks	Rehabilitation of affected areas
Biodiversity	Loss of biodiversity	<ul style="list-style-type: none"> <li>Clear only footprint areas to maintain as much of the remaining natural vegetation on site and to prevent loss of habitat outside</li> <li>Restrict all project activities to the demarcated project area</li> </ul>	Proponent: ECO Workers involved in this phase	Weekly	Vegetation clearance outside of marked areas.	Rehabilitation of affected areas to the satisfaction of the SHE Officer



Environmental Feature	Impact	Management Actions	Responsible person(s) / Implementation responsibility	Frequent	Threshold	Action if threshold is exceeded
		<p>and prohibit off-road driving. Maintain project footprints to an absolute minimal were applicable</p> <ul style="list-style-type: none"> <li>It is envisaged that all the plant species found within the project area are not unique to the specific to the site and their distribution is regional</li> <li>Cordon off the project area and restrict all activities within the demarcated mining area.</li> </ul>				
Neighbours to the site	Disturbance	<ul style="list-style-type: none"> <li>Exploration, sampling and waste dumps mining/test mining works schedule should be limited to normal working hours, between 08h00 and 17h00. This is to</li> </ul>	Proponent: ECO Site Manager	Weekly	A logged complaint about excessive noise	Revision of site activities

Environmental Feature	Impact	Management Actions	Responsible person(s) / Implementation responsibility	Frequent	Threshold	Action if threshold is exceeded
		<p>ensure generated noise does not.</p>				
Waste	Environmental Pollution	<ul style="list-style-type: none"> <li>The exploration, sampling and waste dumps mining/test mining site should be kept tidy at all times.</li> <li>All domestic and general construction waste produced on a daily basis should be cleaned and contained daily to prevent environmental pollution.</li> <li>Separate waste containers (bins) for hazardous and domestic / general waste must be provided on site to avoid mixing of waste</li> </ul>	<p>Proponent: ECO/SHE Officer</p> <p>Workers involved in this phase</p>	Daily	<p>Visible littering around project site</p> <p>A logged complaint</p>	<p>Clean-up of the affected areas and ensuring workers utilise waste containers provided.</p>

Environmental Feature	Impact	Management Actions	Responsible person(s) / Implementation responsibility	Frequent	Threshold	Action if threshold is exceeded
Transport		<ul style="list-style-type: none"> <li>• Exploration, sampling and waste dumps mining/test mining project workers will be transported, in an SUV/ bus (or similar suitable passenger vehicle) to and from site prevent inhaling of dust.</li> </ul>	Proponent: ECO/ SHE Officer	Daily	A logged complaint about bad form of transport	
HIV and AIDS or STIs infections	Potential increase in HIV and AIDS prevalence	<ul style="list-style-type: none"> <li>• To prevent new infections in the area</li> </ul>	SHE Officer	Monthly		
Vehicular traffic safety	Increase in local traffic flow	<ul style="list-style-type: none"> <li>• All drivers of the project vehicles should be in possession of valid and appropriate driving licenses to operate such vehicles.</li> </ul>	Proponent: ECO/ SHE Officer	Weekly	A logged complaint about traffic increase or damage to RA roads	Find alternative access roads for the team. Rehabilitation of affected roads

Environmental Feature	Impact	Management Actions	Responsible person(s) / Implementation responsibility	Frequent	Threshold	Action if threshold is exceeded
		<ul style="list-style-type: none"> <li>• Project vehicles should be in a road worthy condition and serviced regularly in order to avoid accidents as a result of mechanical faults of vehicles.</li> <li>• Vehicles drivers should not be allowed to operate vehicles while under the influence of alcohol.</li> <li>• No heavy trucks or project related vehicles should be parked next to the residents' properties or obstruct the local traffic in any way.</li> </ul>				

### 2.5 Decommissioning and Rehabilitation Phase

Decommissioning and rehabilitation will involve the following:

- Leveling the stockpiled top soil during exploration, sampling and waste dumps mining/test mining activities.
- Collecting and disposing domestic waste at a nearest landfill/ dumpsite.
- Capping or backfilling of all drilled holes with loose materials.
- Any temporal setup of Site office should be dismantled, and the area should be rehabilitated as far as possible to their original state.

### **3 ENVIRONMENTAL MONITORING**

In order to reduce the impacts identified and assessed in the EIA report from "medium" and uphold the "low" significance ratings. Bi-annual and annual EMP compliance audits should be carried out during the course of the project cycle. The first bi-annual audit exercise should be done counting 6 months from the date of ECC issuance. Monitoring reports are to be compiled and submitted to the DEA for archiving. This practice will make the ECC renewal easy when it is about to expire. Therefore, the Proponent should meritoriously monitor and submit the reports to the DEA. The submission is not only done for record keeping purposes, but also in compliance with the environmental legislation and the National Policy on Prospecting and Mining in Protected Areas.

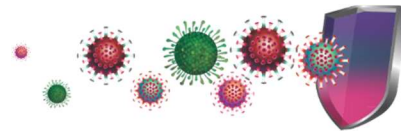
### **4 CONCLUSION**

The potential positive and negative impacts stemming from the planned size amendment and subsequent exploration, sampling and test mining/waste dumps mining activities on the EPL 7285 were identified, assessed and mitigation measures made thereof. Similarly, the environmental impacts that previous mining activities had on the EPL area were also assessed and form part of this submission as a motivation for amending the current size of the EPL 7285. The mitigation measures and recommendations provided in this EIA report and the management action plans provided in the draft EMP, can be deemed sufficient to avoid and/or reduce (where impact avoidance is impossible) the risks to acceptable levels. The Consultant is therefore confident that these measures are sufficient and thus recommend that the Proponent be issued with the ECC to enable MME to increase the size of EPL 7285 and for the commencement of exploration, sampling and waste dumps mining/test mining activities on the property. However, the ECC should be issued on a condition that the provided management measures and action plans are effectively implemented on site and monitored. Most importantly, monitoring of the environmental components described in the impact assessment chapter should be conducted by the Proponent and applicable Competent Authority. This is to ensure that all potential impacts identified in this study and other impacts that might arise during the exploration and test mining are properly identified in time and addressed. Lastly, should the ECC be issued, the Proponent will be expected to be compliant with the ECC conditions as well as legal requirements governing the mineral exploration and related activities as stipulated in the National Policy on Prospecting and Mining in Protected Areas, including;

- Furnishing the MEFT and MME with an environmental report every six (6) months

- Carrying out and submission of an annual Environmental Audit to the MEFT and MME

## 5 COVID-19 Influences



COVID-19 has changed the way the world thinks, acts, and does business. The pandemic has forced a comprehensive review of business practices, a higher level of engagement with technology to offset the constraints due to social distancing, restrictive travel, and a focus on social responsibility. If the ECC is issued, and the Proponent decides to commence with the proposed activities, the current regulations meant to curb the spread of the virus should be implemented on site, and followed. Some of the practices include but are not limited to:

- Social distancing
- Wearing of facemasks
- Applying alcoholic sanitizers (alcohol content to be >70%)