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REPORT:

EXPLORATION ACTIVITIES ON EPL 5263 – COMPLIANCE REPORT

PROJECT NUMBER: ECC-99-465(b)-REP-02-D

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ABBREVIATIONS

ABBREVIATIONS	DESCRIPTION
DEA	Directorate of Environmental Affairs
ECC	Environmental Compliance Consultancy
EIA	environmental impact assessment
EM	electromagnetic
EMP	environmental management plan
EPL	Exclusive Prospecting Licence
GPS	Global Positioning System
ha	hectares
I&APs	interested and affected parties
km	kilometre
Ltd	limited
MEFT	Ministry of Environment, Forestry and Tourism
MME	Ministry of Mines and Energy
Skorpion Mining	Skorpion Mining Company (Pty) Ltd
Pty	propriety
RAB	rotary air blast
RC	reverse circulation

1 INTRODUCTION

1.1 COMPANY BACKGROUND

An environment clearance certificate for EPL 5263 was issued to Skorpion Mining Company (Pty) Ltd (herein referred to as the Proponent) by the Ministry of Environment, Forestry and Tourism (MEFT) in September 2017. An environmental clearance certificate renewal for EPL 5263 was issued to the Proponent on 19 January 2021. Environmental Compliance Consultancy (ECC) has been retained by Skorpion Mining Company (Pty) Ltd, to prepare the application to renew the environmental clearance certificate according to Environmental Management Act, No. 7 of 2007. As part of the renewal application, an environmental compliance audit has been undertaken to determine the status of compliance with the environmental management plan.

The EPL is located in the Oshikoto Region, Namibia. The licence area is shown in Figure 1.

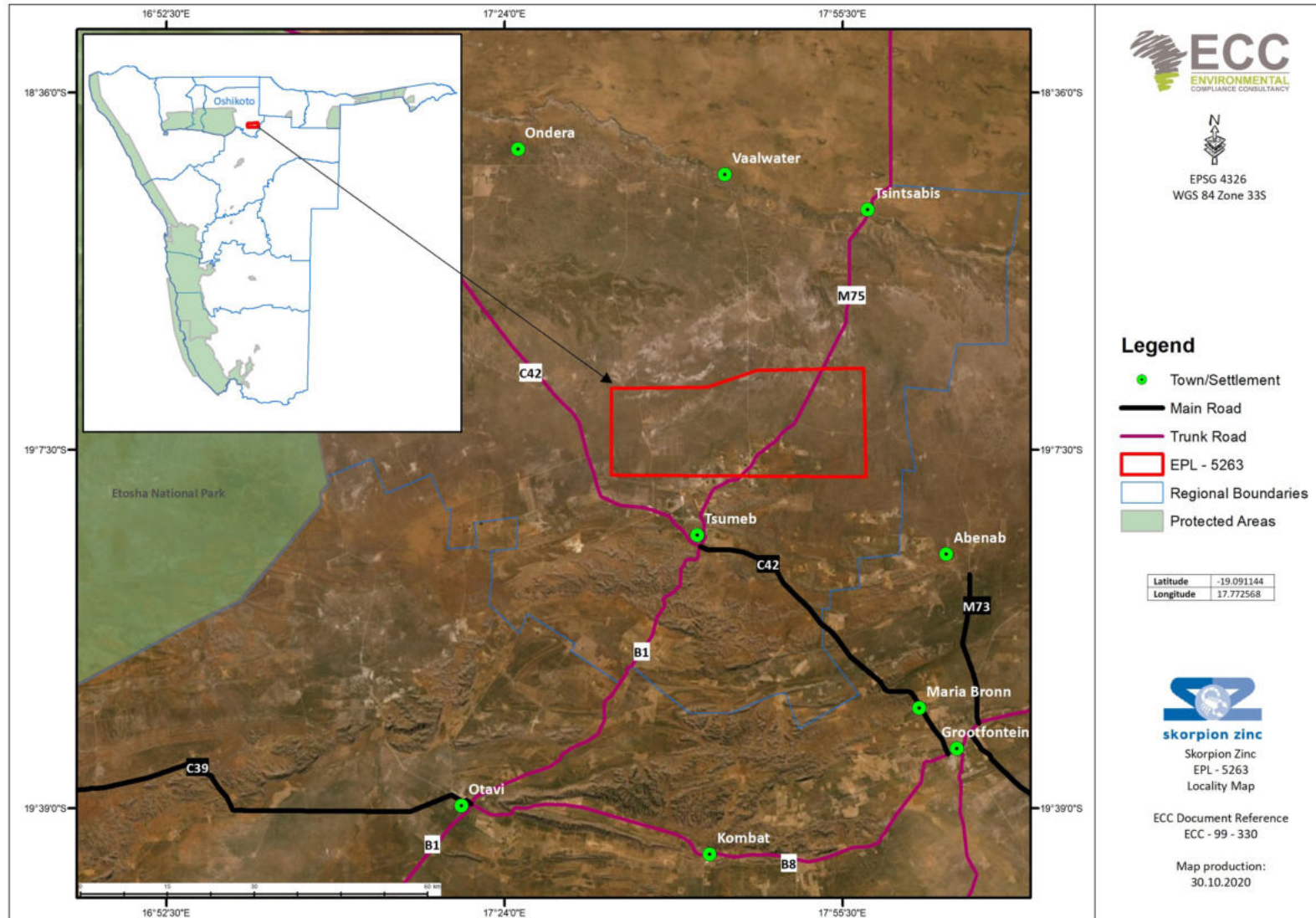


Figure 1 – Locality map of EPL 5263

1.2 THE PROPONENT OF THE PROPOSED PROJECT

The Proponents' details are provided in Table 1.

Table 1 – Proponents details

Company Representative:	Contact Details:
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1.3 ENVIRONMENTAL ASSESSMENT PRACTITIONER

Environmental Compliance Consultancy (ECC) (Reg. No. CRN 2022/0593) has prepared this renewal report and the preliminary 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 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 Skorpion Mining. No member or employee of ECC has, or has had, any shareholding in Skorpion Mining.

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

Environmental Compliance Consultancy
PO Box 91193, Klein Windhoek, Namibia
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1.4 PURPOSE OF REPORT

The purpose of this report is to document the findings of an environmental compliance audit, which accompanies the renewal application for the environmental clearance certificate for EPL 5263.

The approved EMP for the existing environmental clearance certificate is audited to monitor the proceeds of the project and ensure that all measures stipulated in the document are met and effectively adhered to, as required by the Department of Environmental Affairs (DEA). In an event where the project activities are altered, the EMP is required to be revised and amended accordingly.

As per the Environmental Management Act, No. 7 of 2007 and its EIA Regulations of 2012, exploration activities on EPL 5263 cannot be undertaken without a valid environmental clearance certificate. The proposed methods of exploration have minor impacts, as they are done on a small scale and revegetation will be promoted upon completion of exploration activities as per the approved EMP.

2 BACKGROUND TO EPL 5263

Skorpion Mining undertakes low-impact exploration activities on EPL 5263 for base and rare metals, and precious metals in Oshikoto Region.

The activities carried out between September 2017 and September 2020 includes the following:

- Airborne geophysics
- Desktop data compilation and interpretation
- Soil geochemistry survey

There were no activities carried out between September 2020 and July 2023.

2.1 RENEWAL ACTIVITIES

The following activities will be conducted should the Project be renewed and will be updated as the exploration program is refined with results and data:

- Geochemical (soil) sampling
- Geological mapping
- Geophysical surveys
- Drilling exploration holes

3 ENVIRONMENTAL COMPLIANCE AUDIT

3.1 ACTIVITIES FOR THE MONITORING PERIOD

No activities that triggered components of the EMP were performed between September 2020 and July 2023, therefore bi-annual reports were not submitted as per the 6th condition on the ECC-01164. During the monitoring period for EPL 5263 sampling of the sewage effluent, dust monitoring and occasional sampling of borehole water was done.

3.2 ANNUAL COMPLIANCE AUDIT

Furthermore, the approved EMP covers adverse environmental impacts, including any additional potential impacts that may result from the exploration activities at EPL 5263. The EMP provides the technical details for each mitigation, monitoring and institutional measure, including the impact(s) to which it relates and the conditions when required, together with designs, equipment descriptions and operating procedures as granted.

3.3 COMPLIANCE AUDIT FINDINGS

This section outlines the findings of the environmental audit completed for the project. It addresses obligations in terms of the key Acts that govern the activities on site, the commitments made in the EMP, and present the findings and recommended corrective actions where applicable (Table 2).

The EMP:

- Identifies all mineral exploration activities that could cause environmental damage (risks and potential impacts) and provides a summary of actions required;
- Identifies institutions responsible for ensuring compliance with the EMP and provides their contact information;
- Provides standard procedures to avoid, minimise and mitigate the identified negative environmental impacts and to enhance the positive impact of the proposed activities on the environment;
- Provides for site and exploration rules and actions required;
- Forms a written record of procedures, responsibilities, requirements and rules for contractor/s, their staff and any other person who must comply with the EMP;
- Ensure zero pollution incidents; minimal vegetation clearing, protect local flora, fauna, and water resources; and use water and other natural resources effectively and efficiently.
- Provides a monitoring and auditing programme to track and record compliance and identify and respond to any potential or actual negative environmental impacts, and
- Provides a monitoring programme to record any mitigation measures that are implemented.
- Ensure that an annual environmental audit is carried out by either MME or MEFT.
- Once exploration has ceased, any impacts shall be rehabilitated.

3.4 ISSUES OF NON-COMPLIANCE

No issues of non-compliance were identified.

Table 2 - Exploration EMP Audit

Aspect	Potential Impacts	Management/Mitigation Measures	Compliance	Comments
Natural/Biophysical environment	<ul style="list-style-type: none"> – Soil and or groundwater pollution 	<ul style="list-style-type: none"> – Avoid lubricant, fuel and oil spillage or remediate immediately; – Use dip trays at all times when drill rigs are stationary – Apply sound waste management principles 	– Compliant	<ul style="list-style-type: none"> – Sewage effluent and borehole sampling was done. – No soil pollution or damage to flora and fauna occurred during the reporting period. – No poaching incidents were reported. – The proponent maintained the safety of the Biophysical environment.
	<ul style="list-style-type: none"> – Termite mound sampling impacting the ecosystem 	<ul style="list-style-type: none"> – Minimise harm done to the termite mounds as much as possible (i.e. do not destroy the entire termite mound) 		
	<ul style="list-style-type: none"> – Impact on crops and orchards 	<ul style="list-style-type: none"> – A buffer zones of at least 200 m should be followed around any crops or orchards (if this is not possible, consult landowners) 		
	<ul style="list-style-type: none"> – Loss of faunal and floral diversity 	<ul style="list-style-type: none"> – No unnecessary damage to plants and wildlife – Protected trees should not be removed – Make use of a singular access road that is demarcated – No off-road driving allowed on site – Roads to be made only if necessary 		

Aspect	Potential Impacts	Management/Mitigation Measures	Compliance	Comments
	<ul style="list-style-type: none"> - Poaching 	<ul style="list-style-type: none"> - No poaching and killing of any animals, reptiles or birds - No unsupervised movement of exploration staff - Adequate food must be provided for staff 		
	<ul style="list-style-type: none"> - Fires and use of firewood 	<ul style="list-style-type: none"> - No open fires to be made in the veld - Cigarette buds are to be put out and discarded in a predetermined location - No use of firewood on site if no prior arrangements have been made with the farm owner 		<ul style="list-style-type: none"> - Compliant

Aspect	Potential Impacts	Management/Mitigation Measures	Compliance	Comments
Social Environment	- Visual impacts	<ul style="list-style-type: none"> - Minimise new tracks - No tracks on steep slopes - No off-road driving allowed - No tree felling allowed - No stockpiling allowed - No littering on and beyond drill sites allowed - Proper waste disposal systems to be implemented on site, for both hazardous waste (oil, fuel) and domestic waste (plastic, paper) - All exploration accessories to be removed from site after activities 	- Compliant	- Although the Proponent did not carry out activities that triggered the need of this component of the EMP during the reporting period, all operational plans and procedures were maintained.
	- Noise impacts	<ul style="list-style-type: none"> - No exploration activities - including driving of vehicles to take place on farms before 07:00 and after 18:00 unless otherwise arranged with farm inhabitants and neighbours. - No exploration allowed on Sundays. Prospecting on public holidays to be discussed with landowners 	- Non-applicable	<ul style="list-style-type: none"> - The proponent did not do any activities that triggered the need for this component of the EMP during the term. - This will, however, be complied to in the renewal of the Project
	- Damage to roads	<ul style="list-style-type: none"> - No drilling equipment allowed on farms during the rainy season 	- Non-applicable	- The proponent did not do any activities that triggered the need for this component of the EMP during the term.

Aspect	Potential Impacts	Management/Mitigation Measures	Compliance	Comments
				<ul style="list-style-type: none"> The Proponent will ensure that roads are not damaged should the Project be renewed.
	<ul style="list-style-type: none"> Compromised security 	<ul style="list-style-type: none"> An access agreement to be signed prior to exploration No gates to be left open or fences damaged A two-locks system may be implemented with the farm owners' consent An identification document with all exploration staff accompanied by photos to be supplied to farm owners prior to exploration All staff to carry identification badges All vehicles to be marked for identification purposes Staff must be restricted to certain areas, especially when camping on site 	<ul style="list-style-type: none"> Non-applicable 	<ul style="list-style-type: none"> The Proponent did not carry out activities that triggered the need for this component of the EMP during the reporting period, however this will be applicable in the renewal of the Project.
	<ul style="list-style-type: none"> Job Creation 	<ul style="list-style-type: none"> A locals first policy to be adopted when providing employment opportunities. 	<ul style="list-style-type: none"> Non-applicable 	<ul style="list-style-type: none"> The Proponent did not carry out activities that triggered the need for this component of the EMP during the reporting period, however

Aspect	Potential Impacts	Management/Mitigation Measures	Compliance	Comments
				this will be applicable in the renewal of the Project.
	<ul style="list-style-type: none"> – Impact associated with camping of exploration staff 	<ul style="list-style-type: none"> – No unsupervised camping of staff – No visitors allowed – Ablution facilities to be provided in the form of chemical toilets – Exploration staff may not socialize with the local farm workers – A perimeter around the camp must be established within which the team may reside. 	<ul style="list-style-type: none"> – Non-applicable 	<ul style="list-style-type: none"> – The Proponent did not carry out activities that triggered the need for this component of the EMP during the reporting period, however this will be applicable in the renewal of the Project.
	<ul style="list-style-type: none"> – Dust generation impacting farmers and crops 	<ul style="list-style-type: none"> – If excessive dust is created, dust abatement techniques should be implemented, e.g. spraying of water. 	<ul style="list-style-type: none"> – Compliant 	<ul style="list-style-type: none"> – Dust monitoring was done during the reporting period to ensure the safe status of the site.

Aspect	Potential Impacts	Management/Mitigation Measures	Compliance	Comments
	<ul style="list-style-type: none"> - Littering 	<ul style="list-style-type: none"> - Proper waste disposal systems to be implemented on site 	<ul style="list-style-type: none"> - Compliant 	<ul style="list-style-type: none"> - The Proponent ensured that the operational procedures were followed although no activities triggered the need for this component of the EMP.

3.5 REHABILITATION

The proponent continually ensures that all impacts caused by them during exploration activities will be rehabilitated, should no further use of the land be required.

3.6 CONCLUSION AND RECOMMENDATIONS

All proposed activities shall be carried out in compliance with the relevant requirements and conditions of the granted licence in accordance with the approved EMP. It is recommended that the Proponent continues to adhere to all environmental legislation and company standards to ensure that best practical environmental protection continues as the project activities progress.

APPENDIX A - ENVIRONMENTAL MANAGEMENT PLAN

APPENDIX B - ENVIRONMENTAL CLEARANCE CERTIFICATE

11 September 2020

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10 September 2020

Dear Sir/Madam

SUBJECT: ENVIRONMENTAL COMPLIANCE NOTE FOR EXPLORATION ACTIVITIES ON EXCLUSIVE PROSPECTING LICENCE 5263 SITUATED IN THE OSHIKOTO REGION FOR THE PERIOD SEPTEMBER 2017 TO SEPTEMBER 2020

An Environmental Clearance Certificate (ECC) was issued to Skorpion Zinc Mine in respect of Exclusive Prospecting License 5263 in September 2017. The 2017 ECC replaced an earlier ECC issued in September 2014. The original ECC (2014) was based on an Environmental Scoping Report and Environmental Management Plan (EMP) for the planned exploration activities as per EPLs 5261, 5262, 5263 and 5264 commissioned by THL Zinc Holdings (Pty) Ltd (a Vedanta subsidiary and the exploration operator and funder).

While EPLs 5261, 5262, and 5264 have since been relinquished with no additional prospecting taking place since the previous reporting period, this note serves to present the latest assessment of the operational compliance towards the commitments made in the EMP with respect to EPL5263.

Since the previous reporting period Skorpion Mining Company has completed an airborne electromagnetic survey (VTEM) over the EPL in March 2018, as well as a soil geochemistry sampling campaign over selected areas during the period December 2019 to January 2020. These activities were conducted in-line with the work program outlined in the 2014 Scoping Study and the appropriate measures defined in the EMP were enforced. A summary of the activities conducted is provided in Table 1 below.

Given the short duration of the sampling campaign and the fact that only non-invasive activities were undertaken a site visit was deemed by the environmental coordinator as being unnecessary. An internal assessment based on the EMP audit checklist developed was completed by the Exploration Manager and the results are summarized in Graph 1 below.

Given the non-invasive nature of the work the results of the compliance assessment were good with 85% of criteria being found Compliant and 15% being identified as Not Applicable due to the fact that no drilling activities were undertaken. The full performance assessment checklist is presented in Appendix 1.



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by Alan Johnson
Date: 2020.09.11
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Compiled: A Johnson
Senior Geologist (EPL5263 Project Manager)
Vedanta Exploration Southern Africa

Directors: **, A Kumar*, D Naidoo**, I Simataa

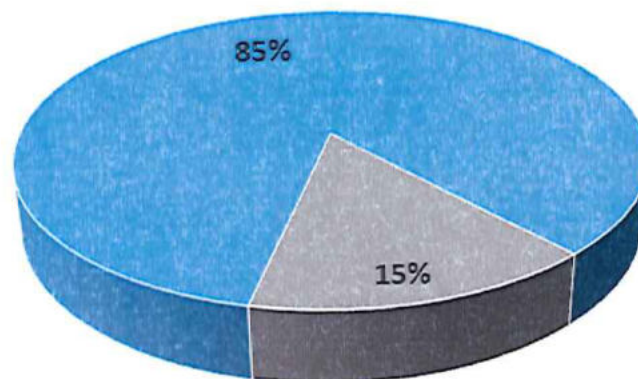
(* Indian)
(** South African)

Sensitivity: Internal (C3)

Table 1. Summary of prospecting activities undertaken on EPL5263 during the period Sept. 2017 to Sept. 2020

Planned Activities as per Environmental Scoping Study	Activities undertaken in the current reporting period	Comments
Airborne Geophysics	VTEM™ Plus airborne survey	Historic airborne surveys deemed too low in resolution for effective targeting
Historic Data Compilation	Desktop data and interpretation	Re-interpretation of digital data in light of the VTEM™ Plus survey results
Termite Mound Geochemistry	Soil geochemistry survey	A decision was made to sample ordinary soils rather than focussing on soils from termite mounds. From a practical perspective these approaches are essentially identical, however by avoiding termite mounds the soil geochemistry survey meant that the termites were not disturbed. A total of 637 samples collected
Rotary Air Blast Drilling	None	Insufficient target confidence to justify this work component
Ground Geophysics (SQUID)	None	Insufficient target confidence to justify this work component
Reverse Circulation Drilling	None	Insufficient target confidence to justify this work component
Diamond Drilling	None	Insufficient target confidence to justify this work component

EPL5263 EMP Performance Assessment



■ Compliant ■ Non-Compliant ■ Not Applicable

Graph 1: Comparison of compliances against non-compliance for the 2020 Performance assessment

Appendix 1

Performance Assessment Checklist

Potential Impact	Mitigation	Compliance			
		Yes	No	N/A	Comment
Natural Environment					
Soil and or groundwater pollution	<ul style="list-style-type: none"> Avoid lubricant, fuel and oil spillage or remediate immediately 	Y			No drilling performed. One 4x4 vehicle used for soil sampling program, was serviced before the start of the program. No hydrocarbon spills reported. Refueling of vehicle conducted only in town. No complaints received
	<ul style="list-style-type: none"> Use drip trays at all times when drill rigs are stationary 			N/A	
	<ul style="list-style-type: none"> Apply sound waste management principles. 	Y			
Termite mound sampling impacting the ecosystem	<ul style="list-style-type: none"> Minimise harm done to the termite mounds as much as possible (i.e. do not destroy the entire termite mound, but remove only the portion which is necessary for sampling) 	Y			Normal soil samples were collected instead of termite mound samples. Actively avoided sampling near termite mounds as part of the change in geochemical sampling strategy
Impact on crops and orchards	<ul style="list-style-type: none"> A buffer zone of at least 200m should be followed around any crops or orchards (if this is not possible, consult land owners) 	Y			No samples were collected near crops, orchards or cultivated areas
	<ul style="list-style-type: none"> No work may be conducted within cultivated areas (if this is not possible, consult land owners) 	Y			
Loss of faunal and floral diversity	<ul style="list-style-type: none"> No unnecessary damage to plants and wildlife 	Y			No new roads were made, no off-road driving. Sample sites were accessed on foot from the nearest farm road. Soil samples collected away from trees and plants as far as possible
	<ul style="list-style-type: none"> Protected trees should not be removed 	Y			
	<ul style="list-style-type: none"> Make use of a singular access road that is demarcated 	Y			
	<ul style="list-style-type: none"> No off road driving allowed on site 	Y			
	<ul style="list-style-type: none"> Roads to be made only if necessary 	Y			
Poaching	<ul style="list-style-type: none"> No poaching and or killing of any animals, reptiles or birds 	Y			Staff accommodated in Tsumeb, no unsupervised movement of staff. No incidents reported
	<ul style="list-style-type: none"> No unsupervised movement of exploration staff 	Y			
	<ul style="list-style-type: none"> Adequate food must be provided for 	Y			

Potential Impact	Mitigation	Compliance			Comment
		Yes	No	N/A	
	staff				
Fires and use of firewood	<ul style="list-style-type: none"> No open fires to be made in the veld 	Y			No fires made, no firewood collected
	<ul style="list-style-type: none"> Cigarette buds are to be put out and discarded in a predetermined location 	Y			
	<ul style="list-style-type: none"> No use of firewood on site if no prior arrangements have been made with the farm owner arrangement 	Y			
Social Environment					
Visual Impact	<ul style="list-style-type: none"> Minimize new tracks 	Y			<p>No new tracks were made, no off-road driving</p> <p>Only existing farm tracks were used</p> <p>Sample sites were accessed on foot</p> <p>No litter or equipment / consumables left on site</p> <p>No trees were felled or disturbed</p> <p>Pits dug at sample sites were filled-in after the sample was collected</p> <p>No hazardous waste produced</p>
	<ul style="list-style-type: none"> No tracks on steep slopes 	Y			
	<ul style="list-style-type: none"> No off road driving allowed 	Y			
	<ul style="list-style-type: none"> No tree felling allowed 	Y			
	<ul style="list-style-type: none"> No stockpiling allowed 	Y			
	<ul style="list-style-type: none"> No littering on and beyond drill sites allowed 	Y			
	<ul style="list-style-type: none"> Proper waste disposal systems to be implemented on site, for both hazardous waste (oil, fuel) and domestic waste (plastic, paper) 	Y			
	<ul style="list-style-type: none"> All exploration accessories to be removed from site after activities 	Y			
Noise Impact	<ul style="list-style-type: none"> No exploration activities – including driving of vehicles to take place on farms before 07:00 and after 18:00 unless otherwise arranged with farm inhabitants and neighbours 	Y			No work conducted after-hours, all weekend sampling work conducted in consultation and with permission from relevant landowners

Potential Impact	Mitigation	Compliance			
		Yes	No	N/A	Comment
	<ul style="list-style-type: none"> No exploration allowed on Sundays. Prospecting on public holidays to be discussed with land owners 	Y			
Damage to roads	<ul style="list-style-type: none"> No drilling equipment allowed on farms during the rainy season 			N/A	No drilling equipment used
Compromised security	<ul style="list-style-type: none"> An access agreement to be signed prior to exploration 	Y			Access agreements signed wherever possible. Some landowners refused to sign any agreement but nonetheless gave permission to access the farms for the work to take place
	<ul style="list-style-type: none"> No gates to be left open or fences damaged 	Y			Gates left in the position they were found, no fences damaged, no incidents reported
	<ul style="list-style-type: none"> A two-locks system may be implemented with the farm owners' consent 	Y			
	<ul style="list-style-type: none"> An identification document with all exploration staff accompanied by photos to be supplied to farm owners prior to exploration 	Y			Staff carried identification when conducting work and consulted with the landowner prior to commencing.
	<ul style="list-style-type: none"> All staff to carry identification badges 	Y			Identification badges were worn
	<ul style="list-style-type: none"> All vehicles to be marked for identification purposes 	Y			High visibility clothing worn, and a marked vehicle used
	<ul style="list-style-type: none"> Staff must be restricted to certain areas, especially when camping on site 	Y			Staff informed the landowners of the work plan and location before commencing
Job Creation	<ul style="list-style-type: none"> A locals first policy to be adopted when providing employment opportunities for unskilled labour 	Y			Casual labour employed from Tsumeb town or from the respective farm depending on availability and preference of the landowner
Impacts associated with camping of exploration staff	<ul style="list-style-type: none"> No unsupervised camping of staff 			N/A	No camping was required, staff were accommodated in Tsumeb. Only authorized and inducted visitors from the company were allowed to visit the work area
	<ul style="list-style-type: none"> No visitors allowed 			N/A	
	<ul style="list-style-type: none"> Ablution facilities to be provided in the form of chemical toilets 			N/A	
	<ul style="list-style-type: none"> Exploration staff may not socialise with the local farm workers 			N/A	
	<ul style="list-style-type: none"> A perimeter around the camp must be established within which 			N/A	

Potential Impact	Mitigation	Compliance			Comment
		Yes	No	N/A	
	the team may reside				
Dust generation impacting farmers and crops	<ul style="list-style-type: none"> If excessive dust is created, dust abatement techniques should be implemented eg. spraying of water. 	Y			No excessive dust created, no complaints received
Littering	<ul style="list-style-type: none"> Proper waste disposal systems to be implemented on site, for both hazardous waste (oil, fuel) and domestic waste (plastic, paper) 	Y			All waste removed from site, no hazardous waste produced
Health impacts on workforce	<ul style="list-style-type: none"> Provision of adequate drinking water in close proximity to drill site to avoid dehydration 	Y			No drilling or cutting of core were conducted. Additional drinking water was kept available at the vehicle for sampling teams
	<ul style="list-style-type: none"> Short breaks taken regularly and in rotation, so that work is not halted 	Y			All staff provided with a site specific safety and environmental induction and supplied with necessary Personal Protective Equipment
	<ul style="list-style-type: none"> Appropriate personal protective equipment (PPE) should be worn to prevent dust inhalation, particularly where there is a risk of inhalation of fibrous minerals created when cutting core 	Y			Regular rest periods enforced.
		39	0	7	
		85%	0%	15%	

Environmental Management Plan

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1 ROLES AND RESPONSIBILITIES CONCERNING THE IMPLEMENTATION OF THE EMP

The roles and responsibilities of all parties involved in effectively managing the environment are set out below:

Environmental Coordinator

The environmental coordinator will inspect the EPL on a three monthly basis to ensure that all specifications are met. The duties of the environmental coordinator will be the following:

- Advise the exploration team in respect of implementation of the environmental specifications
- Conduct visits to ensure all work is aligned to the EMP
- The environmental coordinator shall inspect the site during the six monthly visits. All rehabilitation results will be included in the bi-annual report
- Do inspections of the rehabilitation area and give guidance regarding rehabilitation measures

The Exploration Manager

The duties of the exploration manager are as follows:

- Familiarize him/herself with the requirements of the EMP
- Monitor employees' and contractors' compliance with the environmental specifications and enforce adherence
- Communicate all incidents with the environmental coordinator and distribute internally to avoid repeats
- Maintain a record of activities relevant to environmental management
- The exploration manager shall be responsible for monitoring and the enforcement of the environmental management specifications on a day-to-day basis. Any violation of the environmental specifications shall be recorded and the agreed on disciplinary measures taken

Senior personnel and contractors

The duties of the senior personnel/ contractors are as follows:

- Familiarize himself/ herself with the requirements of the EMP
- Comply with the environmental management specifications
- Ensure that all team members are familiar with the environmental management specifications

2 ENVIRONMENTAL MANAGEMENT REQUIREMENTS

The following are management actions that should be adhered to by the proponent at all times. These management actions cover all phases of exploration; grassroots exploration (sampling, geophysics, etc) and advanced exploration (drilling). All exploration activities should be carried out in line with this Environmental Management Plan (EMP), as may be applicable to the specific phase and activities carried out.

This section of the EMP details the various management processes, from the beginning of the exploration project to its end, concerning the effective management of all project areas. The processes are laid out as follows:

- Legislated Permit Requirements (**Table 1**);
- Planning and Design (This phase contains elements that should be considered during the planning and design phase of the holder of the EPL right. These management requirements are important to ensure that safe managing of the environment is planned and for the exploration activities which are proposed) (**Table 2**);
- Exploration Contract Preparation Management Requirements (**Table 3**); and
- Exploration Mitigation Requirements (see **Table 4** for overview)

Table 1: Relevant permit requirements as required by law

THEME	LEGISLATION INSTRUMENT	MANAGEMENT REQUIREMENTS	CONTACT PERSON
Archaeology	National Heritage Act 27 of 2004	All protected heritage resources (e.g. human remains etc.) discovered, need to be reported immediately to the National Heritage Council (NHC) and require a permit from the NHC before they may be relocated.	Rev Salomon April Tel: (061) 244 375/385/594
Environmental	Environmental Management Act 7 of 2007 EIA Regulations (EIAR) GN 57/2007 (GG 3812)	The amendment, transfer or renewal of the Environmental Clearance Certificate (EIAR s19 & 20).	Dr Freddy Sikabongo/ Ms Saima Angula Tel: 061 284 2751
Forestry	Forest Act 12 of 2001	Protected tree species and any vegetation within 100 m from a	Grootfontein Forestry Office

THEME	LEGISLATION INSTRUMENT	MANAGEMENT REQUIREMENTS	CONTACT PERSON
	Nature Conservation Ordinance 4 of 1975	watercourse may not be removed without a permit. A Harvesting Permit is required if wood is to be collected (harvested) for use as fuel.	Tel: (067)242128
Labour	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.	LSC Labour Consultants Tel: (061) 309 957
Water	Water Resources Management Act 13 of 2013	Water licences are required for water abstraction and use (s44)	Tel: (061) 2087555

2.1 PLANNING AND DESIGN PHASE

This phase contains elements that should be considered during the planning and design phase of the holder of the EPL right. These management requirements are important to ensure that safe managing of the environment is planned and for the exploration activities which are proposed.

Table 2: Management requirements for the Planning and Design phase

ASPECT	MANAGEMENT REQUIREMENT
EMP Implementation	<ul style="list-style-type: none"> Develop an effective strategy to accurately carry out the mitigation actions relevant to the exploration activities in this environment; and Establish an applicable penalty system for non-compliance.
Financial Provisions	<ul style="list-style-type: none"> Allocate appropriate budgetary allowances to develop proper exploration planning and environmental rehabilitation actions through the compulsory development of plans and strategies to mitigate negative environmental and social impacts.
Recruitment	<ul style="list-style-type: none"> Adhere to the legal provisions for the recruitment of labour (target percentages for gender balance, optimal use of local labour and SME's, etc.) in the contract aiming for a 15% representation of women.

ASPECT	MANAGEMENT REQUIREMENT
	<ul style="list-style-type: none"> The recruitment process must be formal and organised; Do not recruit at exploration sites; and Preference should be given to recruit those who live closest to the project area.
Health and Safety	<ul style="list-style-type: none"> Adhere to all legal requirements pertaining to health and safety; and Compile health and safety plan (See Section B).

2.2 EXPLORATION CONTRACT PREPARATION MANAGEMENT

This phase contains elements that should be considered whenever exploration activities are contracted or sub-contracted to a company other than the holder of the EPL right. These management requirements are important to ensure that safe managing of the environment takes place while exploration activities are ongoing.

Table 3: Exploration contract preparation management requirements

ASPECT	MANAGEMENT REQUIREMENTS
EMP implementation	<ul style="list-style-type: none"> Relevant sections of this EMP should be included in the tender documents for all development so that tenderers can make provision for implementation of the EMP
Financial provision	<ul style="list-style-type: none"> Financial provision for the compilation of a Waste Management Plan should be included as a cost item within tenders concerning exploration operations Financial provision for topsoil management and the rehabilitation of borrow pits should be included as a cost item within construction tender documents Financial provision for the facilitation of an induction programme for senior, casual exploration personnel as well as subcontractors and associated personnel should be included as a cost item within tenders concerning all exploration activities Financial provision for the compilation of a Vegetation Management Plan should be included as a cost item within exploration tender documents Financial provision for the drafting of a Communication Plan should be included as a cost item within exploration tender documents
Recruitment	<ul style="list-style-type: none"> Provisions designed to maximise the use of local labour should be included within tenders concerning exploration operations A provision stating that all unskilled labour should be sourced from Tsumeb/Grootfontein and surrounds should be included within tenders concerning explorations operations Specific recruitment procedures ensuring local firms enjoy preference during tender adjudication should be included within tenders concerning exploration operations Women should be given preference for certain jobs (e.g. administration, finance, cleaning, other non-physical work, etc)

2.3 EXPLORATION MITIGATION DETAILS

The following table provides a large-scale overview of all the major environmental management themes pertaining to both generic and site-specific exploration mitigation details. This table serves to act as quick reference (by colour), for the detailed mitigation details that follow below, for the implementation of the non-invasive and invasive components of this EMP. The identified impacts in the Environmental Scoping Study are mitigated under these themes.

Table 4: Generic and site-specific environmental management actions for exploration phases

THEME	OBJECTIVE	MITIGATION DETAIL	
		GENERIC	SITE-SPECIFIC
Waste management	Avoid and where not possible minimise all pollution associated with exploration	Section A	N/A
Health and safety	Safeguard health and safety of labourers and the general public	Section B	N/A
Dust and noise	Avoid and where not possible minimise dust and noise associated with prospecting activities	Section C	Section C
Environmental training and awareness	Awareness creation regarding the provisions of the EMP as well as the importance of safeguarding environmental resources	Section D	N/A
Environmental conservation	Minimise exploration activity footprint and safeguard biodiversity in ecologically sensitive areas	Section E	Section E
Employment/ Recruitment	Minimise negative conflict through legal and fair recruitment practices	Section F	N/A
Stakeholder communication	Provide a platform for stakeholders to raise grievances and receive feedback and hence minimise negative conflict	Section G	Section G
Social and Cultural Heritage	Ensure due consideration is given to matters regarding the cultural and general wellbeing of the affected community and matters incidental thereto	Section H	N/A

SECTION A: WASTE MANAGEMENT

ASPECT	MITIGATION MEASURE
GENERIC MITIGATION DETAILS	
Waste management plan	The Proponent should compile a Waste Management Plan that should address as a minimum the mitigation measures included below.
Hazardous waste	<ul style="list-style-type: none"> • All exploration vehicles (4x4 vehicles and trucks) and equipment on site should be provided with a drip tray/oil spill kit: <ul style="list-style-type: none"> ○ Drip trays are to be transported with vehicles wherever they go ○ Drip trays should be cleaned daily and spillage handled, stored and disposed of as hazardous waste • All exploration vehicles should be maintained regularly to prevent oil leakages. Maintenance of vehicles is not permitted to occur on site as far as reasonably possible, but if maintenance is to be undertaken on site, measures need to be put in place to avoid hydrocarbon spillages. • Maintenance and washing of exploration vehicles should be conducted at a suitable site/facility which adhere to the following: <ul style="list-style-type: none"> ○ The work area/facility should be lined with to be impermeable ○ The work area/facility should have an oil-water separator (oil trap) to collect any run-off from the washing and or maintenance activities, or be equipped with a oil and water separation system • Spilled oil or fuel should be treated as hazardous waste, disposed of as it occurs in the appropriate hazardous waste containers (sealable drums) on site, and removed off site at the end of each day to the closest recognised, appropriate hazardous waste disposal site in the vicinity or as soon as possible when working in remote areas. All such waste can be provided to Westco Salvage which are specialists in the handing and treatment of such materials. • All hazardous substances (e.g. fuel, grease, oil, drilling fluids etc.) or chemicals should be stored in a specific location at the exploration campsite on an impermeable surface which is bunded.
Sewage and grey water from temporary portable toilets on site	<ul style="list-style-type: none"> • Portable chemical toilets or related portable suitable latrine facilities must be provided during exploration: <ul style="list-style-type: none"> ○ This should not only be provided at the camp sites but at the exploration site as well ○ Use of the toilets instead of the veld must be strictly adhered to • If grey water can be collected from ablution facilities at the campsite it should be recycled and: <ul style="list-style-type: none"> ○ Used for dust suppression ○ Used to water a vegetable garden, or to support a small nursery ○ Used to clean equipment
General waste	<ul style="list-style-type: none"> • The exploration site should be kept tidy at all times. All domestic and general waste produced daily should be contained. • No waste may be buried or burned. • No waste is to be left uncontained, in suitable containers, over night. • Waste containers (bins) should be emptied regularly and removed from site to

ASPECT	MITIGATION MEASURE
	<p>the nearest official waste disposal site. All recyclable waste needs to be taken to the nearest recycling depot if available.</p> <ul style="list-style-type: none"> • A sufficient number of separate waste containers (bins) for hazardous and domestic/general waste must be provided on site. These should be clearly marked as such. • Exploration personnel should be sensitised to dispose of waste in a responsible manner and not to litter. • No waste may remain on site after the completion of the project.
Residual samples	<ul style="list-style-type: none"> • Samples that will not be used for further analysis should be taken off site or used (with the required permission from the affected landowner and/or tenant) to repair any possible damaged roads. No samples are to be dumped at site or in the vicinity of the site as to not affect rehabilitation efficiency through physical and chemical pollution of weathering samples.

MONITORING REQUIREMENTS

- Monitor whether the provisions set out in this EMP concerning waste management is being applied as per instructions.
- All non-compliances should be recorded and discussed at monthly site meetings and timeous remedial actions taken.
- All guilty parties that is in contravention of the provisions set out for managing waste should be given a penalty and according to the severity of the impact appropriate steps taken. Employment termination should be considered when irreversible damage to the environment occurs.

SECTION B: HEALTH AND SAFETY

ASPECT	MITIGATION MEASURE
GENERIC MITIGATION MEASURES	
Health and Safety Plan	The Proponent should compile a Health and Safety Plan that should address as a minimum the mitigation measures included below, as well as the Regulations Pertaining to Health and Safety at the Workplace.
Road Safety	<ul style="list-style-type: none"> • Demarcate roads clearly. • Off-road driving should not be allowed unless tracks have been cleared by the affected landowner. • All vehicles that transport materials to and from the site must be roadworthy. • Drivers that transport materials should have a valid driver's license and should adhere to all traffic rules. • Loads upon vehicles should be properly secured to avoid items falling off the vehicle.
Safety around drill holes and general work	<ul style="list-style-type: none"> • Drill holes should be left open for an absolute minimum time. • Demarcate the following areas with danger tape: <ul style="list-style-type: none"> ○ All drilling works

ASPECT	MITIGATION MEASURE
areas	<ul style="list-style-type: none"> ○ Temporary waste stockpiles ▪ Provide additional warning signage in areas of movement and in “no personnel” areas where workers are not active. ▪ Demarcate general work area (that is the area adjacent to the drilling site and associated activities) with a suitable marker. ▪ All exploration materials and equipment are to be stored only within demarcated work areas in the smallest space necessary on site. ▪ Only exploration personnel will be allowed within these work areas. ▪ Two fire extinguishers should always be available at the drill sites. ▪ Comply with all mitigation measures laid out in Section A (Waste Management mitigation details).
Ablutions	<ul style="list-style-type: none"> ▪ Separate ablutions (toilet and shower) should be available for men and women and should clearly be indicated as such. ▪ Portable toilets (i.e. easily transportable) should be available at every exploration site: <ul style="list-style-type: none"> ○ Sewage waste needs to be removed on a regular basis to Tsumeb's sewage disposal site. Alternatively, pump it into sealable containers and store it until it can be removed ○ Workers responsible for cleaning the toilets should be provided with latex gloves and masks
Open fires	<ul style="list-style-type: none"> ▪ No open fires may be made anywhere on site. ▪ No wood may be collected within or near the project area except with the permission of the landowner.
General	<ul style="list-style-type: none"> ▪ Dust protection masks should be provided to workers when working at the drill rigs or in other dusty environments. ▪ No person should be allowed to smoke close to fuel powered machinery or portable toilets (if toilets are chemical toilets the chemicals are flammable). ▪ No workers should be allowed to drink alcohol during work hours. ▪ No workers should be allowed on site if under the influence of alcohol. ▪ Proper safety gear to be supplied to all personnel according to each's level of risk exposure. ▪ Provide at least 5 litres of fresh potable water to each personnel member per day during work hours to prevent dehydration and promote productivity. ▪ Provide adequate shading accessories to personnel to prevent sunstroke and excessive sunburn. ▪ Frequent, short breaks in between work hours should be implemented.
MONITORING REQUIREMENTS	
<ul style="list-style-type: none"> ▪ Non-compliances should be recorded and discussed at the monthly site meetings with the exploration manager and coordinator and appropriate steps taken to rectify such recorded non-compliances. 	

SECTION C: DUST AND NOISE

ASPECT	MITIGATION MEASURE
GENERIC MITIGATION DETAILS	
Dust	<ul style="list-style-type: none"> • Dust masks should be given to personnel working at the drill sites and those responsible for core cutting, should it be done on site or at campsite. • Grey water should be used for dust suppression on a constant basis if available.
Noise	<ul style="list-style-type: none"> • Work hours should be restricted to between 07h00 and 18h00 where exploration involving the use of heavy equipment, power tools, and the movement of heavy vehicles is within 500 m from residential areas. In the event that this is not possible, the landowners and/or tenant need to be consulted well in advance to agree on a mutually acceptable solution.
SPECIFIC MITIGATION DETAILS	
Noise	<ul style="list-style-type: none"> • No drilling is to be conducted before or after the abovementioned working hours without the permission of the land owner as well as the closest neighbours. • No exploration work may occur on Sundays. • Exploration activities may only be conducted on public holidays with the permission of the relevant affected landowner and/or tenant. • The movement of vehicles on the farms are also restricted to working hours or times agreed upon between the team and the land owners
MONITORING REQUIREMENTS	
<ul style="list-style-type: none"> • When complaints are received from farmers or neighbours regarding dust nuisance, abatement in the form of water spraying should be implemented. Communication with those that complained should be continued to determine whether the problem has been resolved. 	

SECTION D: ENVIRONMENTAL TRAINING AND AWARENESS

ASPECT	MITIGATION MEASURE
GENERIC MITIGATION DETAILS	
Environmental Induction (Training)	<p>All exploration personnel are to undergo environmental induction (training) for both exploration stages, which should include as a minimum the following:</p> <ul style="list-style-type: none"> • Detailed review of the current EMP to familiarize personnel with requirements. • Explanation of the importance of complying with the EMP. • Discussion of the potential environmental impacts of the exploration activities. • Employees' roles and responsibilities, including emergency preparedness. • Explanation of the mitigation measures that must be implemented when particular work groups carry out their respective activities. • Explanation of the specific mitigation measures within this EMP especially unfamiliar provisions.
MONITORING REQUIREMENTS	
<ul style="list-style-type: none"> • Environmental Manager to request attendance registers be completed by all personnel attending induction training sessions. 	

SECTION E: ENVIRONMENTAL CONSERVATION

ASPECT	MITIGATION MEASURE
GENERIC MITIGATION DETAILS	
Conservation of vegetation	<ul style="list-style-type: none"> • The layout of the drill grid once developed should consider and avoid sensitive vegetation or mature trees on the project site. • The proponent should compile a Vegetation Management Plan which should include the following as a minimum: <ul style="list-style-type: none"> ○ No trees occurring in this environment may be damaged or removed for any purpose. ○ Protected trees (as listed in Appendix A1 of this EMP) need to be marked and their location recorded on a map.
Conservation of fauna (includes livestock)	<ul style="list-style-type: none"> • Movements of personnel are restricted to the drill sites and work areas only • No hunting, trapping, setting of snares, or any other disturbance of any fauna species allowed.
Drill site locations	<ul style="list-style-type: none"> • Suitable locations should be identified with the assistance of the EC and the following should be considered in selecting these sites: <ul style="list-style-type: none"> ○ First choice should be degraded land. ○ Avoid sensitive areas (e.g. protected archaeological sites or drainage lines). • Drill sites will be kept to a minimum size (the required footprint only) and the working area will be clearly demarcated
Track Creation	<ul style="list-style-type: none"> • Do not remove indigenous trees for the purpose of track creation. • Access tracks and roads should not be wider than the normal width to accommodate an exploration truck. • No tracks must be created without the permission of the farm owner.
Rehabilitation	<ul style="list-style-type: none"> • During the initial prospecting phase, only limited surface rock and soil sampling will take place and it is unlikely that any scars be left by this activity. Remove all waste, defunct samples, and any other remains from the site. • Drilling sites require more extensive rehabilitation. • Remove all sample bags, plastic waste, survey pegs, materials used for sump creation etc. from site at completion of sampling schedule. • Site should be rehabilitated to as close as possible to its original condition. • Re-contour and rip the drill site before the site is finally decommissioned. • Fill holes, rip up, rake track, and spread stockpiled topsoil back over the entire new tracks made, to allow re-vegetation. • Make sure that the environmental coordinator has a site inspection to check that all is in order before moving on to the next site.
SPECIFIC MITIGATION MEASURES	
Protection of crops and orchards	<ul style="list-style-type: none"> • Buffer zones of at least 200m must be established around crops and orchards. In the event that this is not possible, the land owners need to be consulted well in advance to agree on mutually acceptable solution.

ASPECT	MITIGATION MEASURE
Protection of groundwater	<ul style="list-style-type: none"> • Where the water table is penetrated by drilling and the water flows out onto the surface, a furrow needs to be dug that diverts the water to vegetation. • Extra precaution needs to be taken to not contaminate the water especially regarding spillages and leakages of oil, lubricants and fuel.

MONITORING REQUIREMENTS

- Check for traps along fences and during a general drive-through weekly.
- Monitor drill areas and all access tracks and roads. Record all negligent plant destruction sightings, and apply the penalty system to all guilty parties.
- If protected species are removed (after the proper permits have been acquired), negotiations with the farm owner about the replanting of this specie at a specific location, eg. their homestead, should be undertaken.
- Constant monitoring and record keeping of progress must be made until all rehabilitation is done, approved and signed off by the Environmental Coordinator at the decommissioning of exploration.

SECTION F: EMPLOYMENT/RECRUITMENT

ASPECT	MITIGATION MEASURE
GENERIC MITIGATION DETAILS	
Legislation	Adhere to the legal provisions in the Labour Act for the recruitment of labour (target percentages for gender balance, optimal use of local labour and SME's, etc.) in the Contract.
Recruitment	<ul style="list-style-type: none"> • The Contractor should compile a formal recruitment process including the following provisions as a minimum: <ul style="list-style-type: none"> ○ The authority (Regional Council) should assist with the recruitment process. ○ Recruitment should not take place at exploration sites. ○ Ensure that all are aware of recommended recruitment procedures and discourage any recruitment of labour outside the agreed upon process. ○ Contractors should give preference in terms of recruitment of sub-contractors and individual labourers to those from the project area and only then look to surrounding towns. ○ Clearly explain to all job-seekers the terms and conditions of their respective employment contract (e.g. period of employment etc) and make use of interpreters when necessary.
MONITORING REQUIREMENTS	
<ul style="list-style-type: none"> • The Exploration Manager should monitor the effective implementation of the recruitment process. • Work should only continue until all requirements are met, with the submission of records. 	

SECTION G: STAKEHOLDER ENGAGEMENT

ASPECT	MITIGATION MEASURE
GENERIC MITIGATION DETAILS	
Communication plan	<ul style="list-style-type: none"> ▪ The proponent should draft a Communication Plan, which should outline as a minimum the following: <ul style="list-style-type: none"> ○ How stakeholders, who require ongoing communication for the duration of the exploration period, will be identified and recorded and who will manage and update these records (i.e. use the stakeholders list for this study as a basis); ○ How these stakeholders will be consulted on an ongoing basis; ○ Make provision for grievance mechanisms – i.e. how concerns can/ will be lodged/ recorded and how feedback will be delivered as well as further steps of arbitration in the even feedback is deemed unsatisfactory.
SITE SPECIFIC MITIGATION DETAILS	
Access agreements	<ul style="list-style-type: none"> ▪ An access agreement needs to be signed with landowners prior to any exploration taking place on site. ▪ The owner of the farm must be given an opportunity to negotiate the terms of the agreement. ▪ The following needs to be included in the agreement: <ul style="list-style-type: none"> ○ Compensation options ○ Operating hours ○ A commitment from the prospector to rehabilitate damage done and remove all waste from site ○ Agreements on how access will be gained and managed eg. two lock system ○ That no gates may be left opened or fences damaged. ○ A commitment that this EMP will be adhered to. ○ Liability insurance for fire damage. ○ As appendices: A copy of the EMP and a short explanation of the Environmental Assessment that was conducted.
Safety and Security	<ul style="list-style-type: none"> ▪ Farm owners need to be given a list containing names and photographs of the exploration team for identification purposes prior to the start of any exploration. ▪ Each member of the team needs to wear an ID tag (with a photo on) at all times when on site as well as a team uniform. ▪ Bright, reflective jackets need to be worn by each person on site, especially on hunting farms. ▪ All exploration vehicles must be marked for easy identification. ▪ When camping on site the following needs to be adhered to: <ul style="list-style-type: none"> ○ No visitors allowed to visit staff. ○ Staff are not allowed to interact with the farmers workers. ○ A perimeter around the camp must be established within which the team may reside and are restricted to.

ASPECT	MITIGATION MEASURE
MONITORING REQUIREMENTS	
<ul style="list-style-type: none">• Ensure that the necessary contracts are signed and in place.• Keep constant updated records of all concerns and issues logged during the course of the exploration programme.• Monitor the speed and effectiveness of remedial actions taken upon concerns and issues raised by the public during exploration and remedy all timeously.	

SECTION H: SOCIAL AND CULTURAL HERITAGE

ASPECT	MITIGATION MEASURE
GENERIC MITIGATION DETAILS	
Archaeology	<ul style="list-style-type: none"> • Should a heritage site or archaeological site be uncovered or discovered during either exploration phases of the project, a "chance find" procedure should be applied in the order they appear below: <ul style="list-style-type: none"> ○ If operating machinery or equipment, stop work ○ Demarcate the site with danger tape ○ Determine GPS position if possible ○ Report findings to foreman ○ Report findings, site location and actions taken to superintendent ○ Cease any works in immediate vicinity ○ Visit the site and determine whether work can proceed without damage to findings ○ Determine and demarcate the exclusion boundary ○ Site location and details to be added to the project's Geographic Information System (GIS) for field confirmation by an archaeologist ○ Inspect site and confirm addition to project GIS ○ Advise the National Heritage Council (NHC) and request written permission to remove findings from work area ○ Recover, package and label findings for transfer to the National Museum • Should human remains be found, the following actions will be required: <ul style="list-style-type: none"> ○ Apply the chance find procedure as described above ○ Schedule a field inspection with an archaeologist to confirm that remains are human ○ Advise and liaise with the NHC and Police ○ Remains will be recovered and removed to either the National Museum or the National Forensic Laboratory. • Contact person at NHC: Rev. Soloman April: Tel: (061) 244 375/ 385/594
MONITORING REQUIREMENTS	
<ul style="list-style-type: none"> • Make sure no archaeological site is disturbed whilst excavation and recovery takes place • Make sure everything of importance is removed from site and declared safe by an archaeologist before exploration can continue on the site • Daily monitoring of fences and gates which have been entered through to ensure no unplanned movement of livestock or animals occur. 	

2.4 REHABILITATION AND DECOMMISSIONING

This phase contains elements that should be considered when exploration activities have been completed by the holder of the EPL right. These management requirements are important to ensure that rehabilitation of the environment is optimised. It is important to note that ongoing rehabilitation initiatives have been captured and detailed in the various themes (as set out above) of the exploration phase.

Table 5: Management requirements for Rehabilitation and Decommissioning

ASPECT	MANAGEMENT REQUIREMENT
EMP Implementation Record	<ul style="list-style-type: none"> Filing and dating of all Bi-annual reports (including photographic documentation of successful rehabilitation initiatives) A final site inspection to be conducted and documented 6 months after all activities associated with the exploration initiative has been completed
Financial Provisions	<ul style="list-style-type: none"> Allocate appropriate budgetary allowances for all possible rehabilitation activities and initiatives (including such requirements for a communication strategy)
Landowner and I&AP	<ul style="list-style-type: none"> Develop a communication strategy which will clearly indicate the future of the project (ie will further drilling activities be conducted or Application for a Mining Rights License be made)

APPENDIX A1 – SENSITIVE TREE SPECIES

Sensitive Tree Species

Sclerocarya birrea (Marula tree)



Ziziphus mucronata (Buffalo Thorn)





REPUBLIC OF NAMIBIA
MINISTRY OF ENVIRONMENT, FORESTRY AND TOURISM
OFFICE OF THE ENVIRONMENTAL COMMISSIONER

ENVIRONMENTAL CLEARANCE CERTIFICATE

ISSUED

In accordance with Section 37(2) of the Environmental Management Act (Act No. 7 of 2007)

TO

Skorpion Mining Company (Pty) Ltd
Private Bag 2003, Rosh Pinah

TO UNDERTAKE THE FOLLOWING LISTED ACTIVITY

Exploration Activities on Exclusive Prospecting License (EPL) 5263,
Oshikoto Region

Issued on the date: **2021-01-19**
Expires on this date: **2024-01-19**

[Signature]
21 JAN 2021
ENVIRONMENTAL COMMISSIONER
REPUBLIC OF NAMIBIA

(See conditions printed over leaf)



CONDITIONS OF APPROVAL

1. This environmental clearance is valid for a period of 3 (three) years, from the date of issue unless withdrawn by this office
2. This certificate does not in any way hold the Ministry of Environment and Tourism accountable for misleading information, nor any adverse effects that may arise from these activities. Instead, full accountability rests with the proponent and its consultants
3. This Ministry reserves the right to attach further legislative and regulatory conditions during the operational phase of the project
4. All applicable and required permits are obtained and mitigation measures stipulated in the EMP are applied particularly with respect to management of ecological impacts.
5. Strict compliance with national heritage guidelines and regulations is expected throughout the life-span of the proposed activity, therefore any new archaeological finds must be reported to the National Heritage Council for appropriate handling of such.
6. A six monthly report on project progress and environmental management profile, starting from date of commencement of operations, must be submitted by the Proponent to Office of Environmental Commissioner.