

Updated Environmental Management Plan (EMP)

EXPLORATION ACTIVITIES AT MINING LICENSES 73C, 73B, 16, 9 AND 21 AT KOMBAT IN THE OTJOZONDJUPA REGION

ECC No.: ECC-01087

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LIST OF ABBREVIATIONS

Abbreviation	Meaning
CSR/CSI	Corporate Social Responsibility/Corporate Social Investment
DEAF	Department of Environmental Affairs and Forestry
EAP	Environmental Assessment Practitioner
ECC	Environmental Clearance Certificate
EDS	Excel Dynamic Solutions
EIA	Environmental Impact Assessment
EMA	Environmental Management Act
EMP	Environmental Management Plan
MAWLR	Ministry of Agriculture, Water and Land Reform
MEFT	Ministry of Environment, Forestry and Tourism
ML / ML's	Mining License / Mining Licenses)
MME	Ministry of Mines and Energy
PPE	Personal Protective Equipment
Reg / S	Regulation / Section
SHE Officer	Safety, Health & Environmental Officer

1 INTRODUCTION

1.1 Project Background

Trigon Mining (Namibia) (Pty) Ltd¹ (*Trigon Mining* or the *Proponent*) intends to continue conducting exploration activities on their Mining Licenses (MLs) No. 73C, 73B, 16 & 9, and 21. The Mining Licenses are located close to the Kombat Settlement on the southern margin of the Otavi Mountain Range in the Otjozondjupa Region (**Figure 1**). The Mine is a past-producing copper, lead and silver mine that was intermittently in operation from the early 1900s to 2007, and has been on care and maintenance since early 2008. The Mine intends to expand its operations by undertaking further exploration and mining works. ECC-01087 was granted to Trigon Mining for exploration activities on the MLs on 16 November 2020. A summary of the Mining Licenses is presented in **Table 1**

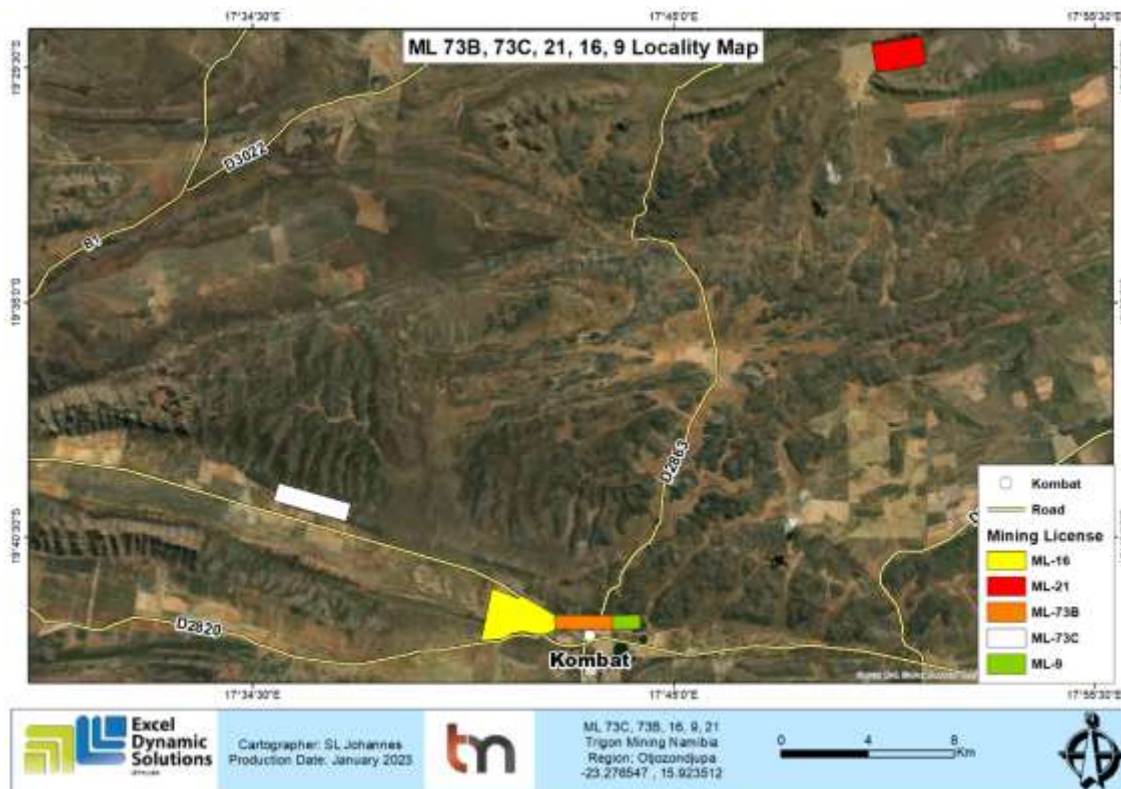


Figure 1: Locality Map (MLs 73C, 73B, 16, 9 & 21)

¹ The Kombat Mine is owned by Namibian company, Trigon Mining (Namibia), which is owned by: 80% - Trigon Metals Inc (Canadian company, listed on the TSX Venture Exchange), 10% - Texel Mining and Exploration (local partner), and 10% - Epangelo Mining Company (Namibian state owned mining company). The Trigon group is focused on copper and silver exploration, development and mining in attractive jurisdictions in Africa

Table 1: Mining License Summary

MINING LICENSE	SIZE (ha)	Prospective/Target Commodity
73C (The Gross Otavi project)	262.28	Base and Rare Metals; Precious Metals
73B (Old Kombat Copper mine)	150.1931	Base and Rare Metals; Precious Metals
16 (Old Kombat Copper mine)	467.6958	Base and Rare Metals
9 (Old Kombat Copper mine)	74.1239	Base and Rare Metals; Non-Nuclear Fuel Minerals; Precious Metals; Precious Stones; Semi-Precious Stones
21 (The Harasib project)	264.1346	Base and Rare Metals

It should be noted that exploration and mining activities are listed in the EIA Regulation as activities that may not be undertaken without an Environmental Clearance Certificate (ECC). This is stipulated under the Environmental Management Act (EMA) (2007) and its 2012 Environmental Impact Assessment (EIA) Regulations. The listed activities as per EIA regulations as relevant to the proposed activity are listed below:

"3. MINING AND QUARRYING ACTIVITIES

- *3.1 The construction of facilities for any process or activities which requires a licence, right or other form of authorisation, and the renewal of a licence, right or other form of authorisation, 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."*

Associated activities include

"8. WATER RESOURCE DEVELOPMENTS

- *8.1 The abstraction of ground or surface water for industrial or commercial purposes,*

- *8.2 The abstraction of groundwater at a volume exceeding the threshold authorised in terms of a law relating to water resources.”*

This document has been prepared as a legal requirement by Section 8 of the EMA, No. 7 of 2007 and its 2012 EIA regulations. The compilation of this EMP is also one of the outputs required of the Environmental Consultant (Environmental Assessment Practitioner (EAP), by The Proponent. It is required of the Environmental Consultant to comply with the EMA and provide for the following:

- Prepare a detailed Environmental Management Plan that can be used as guide to monitor compliance to the recommendations made in the EIA and to assist in managing and monitoring activities throughout the operation and maintenance of the proposed exploration and prospecting activities on the EPL.
- The Environmental Consultant must clarify in the EMP, the roles and responsibilities of the Proponent, the contractors and any other identified stakeholders.

1.2 The Purpose of the Environmental Management (EMP)

Regulation 8(j) of the EIA Regulations (2012) requires that a draft Environmental Management Plan (EMP) shall be included as part of the EIA report. A **‘Management Plan’** is defined as:

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

An EMP is one of the most important outputs of the EIA process as it synthesizes all the proposed management & 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 mitigation measures to be implemented during mining. 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 can be amended to adapt to address project changes and/or environmental conditions and feedback from compliance monitoring.

The purpose of this document is, therefore, to guide environmental management throughout the different phases of the proposed activities, namely: planning, exploration and mining, and decommissioning & rehabilitation. The anticipated phases of the proposed project are briefly described below:

- **Planning and Design phase** - This is the stage of the proposed project during which the Proponent prepares all the administrative and technical requirements needed for the planned exploration activities. The planning phase includes obtaining the necessary permits and authorizations from relevant national and local stakeholders, facilitating the recruitment and services and procurement of required equipment, etc., in preparation for the exploration activities.
- **Exploration and Mining phase** - This is the phase where the proponent carries out the exploration and mining activities on the ML's.
- **Decommissioning and Rehabilitation** – This is the phase during which the exploration activities and associated works on the MLs cease. The decommissioning of the activities may be considered because of poor results (depletion of target commodity) or declining in the commodity market price. Before the decommissioning phase, the Proponent will need to have site rehabilitation measures in place.

This EMP will be used by the Proponent, employees and/or contractors to implement management measures to address the environmental impacts identified in the EIA. This is done to ensure that adverse impacts on the environment are avoided or limited if they cannot be avoided completely, while maximizing the positive impacts.

2 PROJECT DESCRIPTION: PROPOSED PROJECT ACTIVITIES

The proposed activities entail exploration (to delineate the mineral deposits) on and subsequent mining activities on the MLs. Exploration is aimed at determining whether the deposit for the targeted commodity (copper) is economically feasible (to advance to the resources development and mining phase). Exploration is done to acquire the necessary data required for further decision-making and investment options.

The proposed activities are summarized below.

2.1 Exploration Activities

The proposed exploration programme includes surface and underground exploration activities. The exploration on the MLs will be undertaken in three stages outlined below.

- Desktop Study (Geological mapping),
- Lithology geochemical surveys will be determined by the Proponent and underground conditions during exploration, and
- Detailed Exploration (trenching, blasting and drilling).

Once exploration works are completed, the feasible parts of the MLs will be developed for mining.

3 LEGAL FRAMEWORK: PERMITTING AND LICENSING

The Proponent has the responsibility to ensure that all the exploration works and associated activities conform to the principles of the EMA and other relevant legal requirements. Table 2 below lists the requirements of an EMP as stipulated by Section 8 (e) of the EIA Regulations and associated governing legal requirements, primarily on specific approvals and permits that may be required for the proposed project activities.

Table 2: List of applicable legal requirements and permits

Legislation/Policy/ Guideline: Custodian	Relevant Provisions	Implications for this project
Environmental Management Act (No. 7 of 2007) 2012 Environmental Impact Assessment (EIA) Regulations: Ministry of Environment, Forestry and Tourism (MEFT)	The EMA has stipulated requirements to complete the required documentation to obtain an Environmental Clearance Certificate (ECC) for permission to undertake certain listed activities.	The ECC should be renewed every 3 years (counting from the date of issuance) at least 3 months before expiry date. The contact details at the Department of Environmental Affairs and Forestry (DEAF), Ministry of Environment, Forestry and Tourism (MEFT), Office of the Environmental Commissioner Tel: +264 61 284 2701
Minerals (Prospecting and Mining) Act (No. 33 of 1992): Ministry of Mines and Energy (MME)	Section 52 requires mineral license holders to enter into a written agreement with affected landowners before exercising rights conferred upon the license holder. Section 54 requires written notice to be submitted to the Mining Commissioner if the holder of a mineral license intends to abandon the mineral license area. Section 91 requires that rehabilitation measures should be included in an application for a mineral license.	The Proponent should ensure that the mining licenses conditions are complied with and renewal applications (when need be), are timely launched with the MME. Contact details at the MME (Mining Commissioner) Tel: +264 61 284 8167

Legislation/Policy/ Guideline: Custodian	Relevant Provisions	Implications for this project
<p>Petroleum Products and Energy Act (No. 13 of 1990) Regulations (2001): Ministry of Mines and Energy (MME)</p>	<p>Regulation 3(2)(b) states that “No person shall possess or store any fuel except under 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”</p> <p>A consumer installation certificate is required in terms of Regulation 19 (5) of the Act.</p>	<p>The Proponent has fuel storage tanks of more than 600 litres onsite, and the Permit (Consumer Installation Certificate No. CI/2806/2021) is obtained (issued by the Minister of Mines and Energy on 30 July 2021).</p> <p>Ministry of Mines and Energy: Director – Petroleum Affairs</p> <p>Tel: +264 61 284 8291</p>
<p>Water Act 54 of 1956: Ministry of Agriculture, Water and Land Reform (MAWLR)</p>	<p>Prohibits the pollution of water and implements the principle that a person disposing of effluent or waste has a duty of care to prevent pollution (S3 (k)).</p> <p>Provides for control and protection of groundwater (S66 (1), (d) (ii)).</p> <p>Liability of clean-up costs after closure/abandonment of an activity (S3 (l)). (l)).</p>	<p>The permits and license required thereto should be obtained from MAWLR’s relevant Departments and ensure compliance to stipulated conditions and timely renewals.</p> <p>These permits include Borehole Drilling Permits, Groundwater Abstraction & Use Permits, and <u>most importantly a special permit to dewater the underground Mine.</u></p>
<p>Water Resources Management Act (No 11 of 2013): Ministry of Agriculture, Water and Land Reform (MAWLR)</p>	<p>Ensure that the water resources of Namibia are managed, developed, used, conserved and protected in a manner consistent with, or conducive to, the fundamental principles set out in Section 66 - protection of aquifers, Subsection 1 (d) (iii) provide for preventing the contamination of the aquifer and water pollution control (S68).</p>	<p>Division: Water Policy and Water Law Administration Division</p> <p>Tel: +264 61 208 7158</p> <p>When required, the Wastewater / Effluent Discharge Permit should be applied from MAWLR.</p> <p>Water Environment Division</p> <p>Tel: +264 61 208 7167</p>

4 EMP IMPLEMENTATION ROLES AND RESPONSIBILITIES

Trigon Mining is ultimately responsible for the implementation of the EMP (management and mitigation measures provided under the next chapter). However, Trigon Mining may delegate this responsibility or part of it to someone else at any time, as they deem necessary. The roles and responsibilities of all delegates/parties involved in the effective implementation of this EMP are set in Error! Reference source not found.

Table 3: Institutions and Offices responsible for EMP implementation

Role (Person and or Institution)	Responsibilities
Trigon Mining (Namibia) (Pty) Ltd. (Proponent)	<ul style="list-style-type: none"> -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 and issuing fines for contravening EMP provisions.
Exploration / Mining Manager	<p>This individual will be responsible to ensure that all the associated works of the project are completed on time, and therefore, their responsibilities is to:</p> <ul style="list-style-type: none"> -Ensure that relevant commitments contained in the EMP are adhered to. -Ensure relevant staff is trained in procedures entailed in their duties. -Maintain records of all relevant environmental documentation for the project. -Reviewing the EMP annually and amending the document when necessary. -Issue 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. -Develop and manage of schedules for daily activities
Safety, Health & Environmental (SHE) Officer	<p>The SHE Officer will have the following responsibilities:</p> <ul style="list-style-type: none"> -Management and facilitation of communication between the Proponent, and affected parties or stakeholders regarding this EMP. -Conducting site inspections of all areas with respect to the implementation of this EMP (monitor and audit the implementation of the EMP). -Advising the Proponent or Mine Manager on the removal of person(s) and/or equipment not complying with the provisions of this EMP.

Role (Person and or Institution)	Responsibilities
	<ul style="list-style-type: none"> -Making recommendations to the Manager with respect to the issuing of fines for contraventions of the EMP. -Undertaking an annual review of the EMP and recommending additions and/or changes to this document.
Public/Project Relations Officer (PRO)	<p>The PRO will be responsible for the following tasks:</p> <ul style="list-style-type: none"> -Liaising between the affected communities and the Proponent. -Ensure effective communication with stakeholders, local and neighbouring communities, media (if necessary) and the public. -Organising and overseeing public relations activities, and managing public relations issues. -Preparing and submitting public relations reports, if required. -Collaborating with personnel and maintaining project-related open communication among personnel.

5 ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

5.1 Identified Key Potential Impacts

The potential positive and negative impacts that have been identified from the proposed exploration activities are listed below:

Positive Impacts	Negative Impacts
<ul style="list-style-type: none"> • Socio-economic development: temporary and long-term employment opportunities. • Investment opportunities/infrastructure-related development benefits, • Boosting of local economic (through corporate social responsibility/Investment (CSR/CSI); regional and national economic development through taxes. • Increased support for local businesses through the procurement of locally available goods and services. 	<ul style="list-style-type: none"> • Water resources (over-abstraction of water) and pollution. • Occupational health and safety risks associated with project activities. • Impact on the groundwater table through dewatering associated with the activities. • Land subsidence and slope deformation. • Noise and vibrations associated with drilling and blasting activities. • Waste generation. • Vehicular traffic safety. • Social Nuisance - Job seeking leading to the influx of non-residents in Kombat.

5.2 The Environmental Management and Mitigation Measures

The management actions are aimed at avoiding the potential negative impacts, where possible. Where it is impossible to avoid these impacts, measures are provided to reduce the impacts' significance while maximizing the project benefits.

The management and mitigation measures recommended for the potential impacts described and assessed in the EIA Report are provided in Table 4 and Table 5.

Table 4: Management Actions and Mitigation Measures for Planning and Design

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
Planning and Design Management & Mitigation Measures					
EMP implementation and training	Lack of EMP awareness and implications thereof	-A Comprehensive Health and Safety Plan for the activities should be compiled. -An EMP non-compliance penalty system should be implemented on site. -The ECC should be renewed on time (at least 3 months prior to expiry date). -Appoint a Safety Health Environmental (SHE) Officer to manage the EMP implementation and monitoring.	-All required EMP implementation plans/ systems are in place. -Timely ECC Renewal -Bi-Annual Environmental reporting -Appointed SHE Officer	-Proponent -Underground Exploration/ Mining Manager	-Pre-activities
Authorizations	Lack of Permits/ Licenses	-All the required agreements and licenses / permits should be obtained prior to commencement of activities (and timely renewed as required). The permits, and licenses agreements referred to herein include associated permits such as: (a) Groundwater Abstraction & Use / Distribution permit from MAWLR (b) Water supply agreements to offtakers, where necessary and/or required.	-Applicable permits and licenses are obtained from relevant authorities. -Agreements/permits signed and obtained on time.	-Proponent -Underground Exploration/ Mining Manager	-Pre-activities and when necessary, throughout
Exploratiion equipment and machinery	Poor designs and subsequent failures	-The project equipment, machinery as well as vehicles should be properly designed (up-to-standard) and meet international best practise standards to ensure that there are no avoidable mechanical failures .	-Compliance with international best practice for all services and goods	-Proponent (Human Resources Unit)	-Pre-activities

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
Socio-economy	Creation of employment opportunities: The conflicts and tension arising owing to giving employment opportunities to outsiders over locals	<ul style="list-style-type: none"> -Opportunities for the training of unskilled and skilled workers from local communities should be maximized and employed for exploration and mining and related works. -Preference of local people (Kombat, Otavi and Grootfontein) for employment for jobs should be implemented. Out-town employment should be justified. Equal opportunity should be provided for both men and women, when and where possible. -Minimize the influx of outsiders into the area for works that can be done by the locals by prioritizing the employment of more local people. 	<ul style="list-style-type: none"> -Number of locals employed for exploration and mining activities are mainly from the local communities for all the work that they can do. -No complaints of unfair recruitment procedures. -Grievance and response records pertaining recruitment at the Mine 	-Underground Exploration/ Mining Manager	-Pre-activities and when necessary, throughout
	Procurement of goods and services: The conflicts arising owing to offering opportunities to outsiders over locals for locally available services	<ul style="list-style-type: none"> -Procurement for services and goods that are locally, regionally and nationally available should be open only to Namibian companies with strong local participation. -All services related to exploration and mining such as drilling, blasting equipment and associated supplies that the Proponent may need, and preference should be given to local providers of such services. If not available locally, the services search should be extended to a regional level (Otjozondjupa Region) and lastly, nationally, or international, if all efforts yield no success. 	<ul style="list-style-type: none"> -Number of hired contractors. -Record of hired or contracted companies or services providers 	<ul style="list-style-type: none"> -Proponent (Procurement Unit) -Underground Exploration/ Mining Manager 	-Pre-activities

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
		<p>-Opportunities such as small tenders should be awarded through the established committee / the Kombat Settlement Office to ensure that exiting local businesses benefit from the project through goods/services provision.</p>			
	<p>Corporate Social Responsibility / Investment (CSR)/CSI</p>	<p>-The Proponent should explore ways to enhance local community benefits with a focus on well-conceived projects that are clearly aligned with local needs and acceptable to the Settlement Council and local communities.</p> <p>-A Practical Social Plan for CSR/CSI should be drafted and shared with the local authority (stakeholders) for consultation and review prior to implementation.</p> <p>-Fulfil the CSR commitment, upon proper consultation with the local development committees to establish the priority community needs.</p> <p>-Consider providing and/or donating services to communities in need or supporting their projects.</p> <p>-as part of the CSR, consider assisting the Kombat Settlement with environmental clearance of the existing dumping site and fence it off with better materials (to stop vandalism and pollution). The recommended <u>material is steel-pole wall type of fencing around the dumpsite.</u></p>	<p>-Visible involvement in investing in the communities through community project support</p>	<p>-Proponent (CSR Unit)</p> <p>-Underground Exploration/ Mining Manager</p>	<p>Throughout the project cycle</p>

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
National Economic development	Failure to pay taxes and fees	-Ensure compliance with their project’s requirements by the Namibia Revenue Agency and Ministry of Mines and Energy by paying taxes and energy levies, respectively.	-Taxes and levies are correctly paid and accordingly -Visible improvement in contribution to national economy by Trigon Mining	-Proponent (Finance Unit)	Throughout the project cycle (based on provided periods)

Table 5: Management Actions and Mitigation Measures for Underground Exploration and Mining

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
Exploration Management & Mitigation Measures					
EMP implementation and training	Lack of EMP awareness and implications thereof	<ul style="list-style-type: none"> -EMP trainings should be provided to all workers on site. -All site personnel should be aware of necessary health, safety, and environmental considerations applicable to their respective work. -The implementation of this EMP should be monitored. <p>The site should be inspected, and a compliance audit done throughout <u>the project activities, monthly and EMP implementation auditing done bi-annually.</u></p> <ul style="list-style-type: none"> -Implement an EMP non-compliance penalty system. 	<ul style="list-style-type: none"> -EMP implementation monitoring conducted bi-annually and reported to MEFT. -External EMP audits -The ECC is renewed every 3 years -Records of EMP training conducted. 	-SHE Officer	Throughout the project cycle
Communication between the Proponent and affected communities (especially farmers to the northern side of the Mine)	Lack of communication between affected water users and Proponent with regards to groundwater pumping	<ul style="list-style-type: none"> -The contact details of the PRO or Community Liaison Officer should be provided to affected farmers and Kombot Settlement Office for easy communication and receiving of grievances and complaints for addressing. -The Proponent should compile a clear communication procedure / plan which should include a grievance and response mechanism. 	<ul style="list-style-type: none"> -PRO is part of the project personnel. -Communities grievances are addressed to satisfaction 	-Underground Exploration/ Mining Manager -PRO	Throughout the project cycle

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
Groundwater	Lowering of water levels in downstream boreholes during dewatering to enable mining operations	<p>-A Groundwater Abstraction/Pumping & Use/Distribution Permit should be applied for and obtained from MAWLR.</p> <p>-Groundwater levels before mine dewatering should be taken from boreholes on and around Kombat (particularly to the north of the Mine within a 20km radius) at least 6 consecutive months prior to mining activities to establish the baseline groundwater information. This information should be recorded in a Groundwater Monitoring Program database and shared with affected communities, when requested.</p> <p>-within a 20km radius of the Mine, groundwater levels should be recorded every month from the first month of mine dewatering. The data should be recorded in a database for inclusion in Environmental monitoring reporting.</p> <p>-As part of compliance monitoring, groundwater level should be done by the Department of Water Affairs and external monitoring audit conducted by independent parties / consultants for verification twice a year (bi-annually).</p> <p>-The volumes of water approved by MAWLR should be adhered to, i.e., adhere to the pumping threshold to minimize the impact on other water users and the environment, while allowing sustainable mining works.</p>	<p>-Water levels from boreholes on and around Kombat, are taken and recorded in a database for annual auditing</p> <p>-A Groundwater Monitoring programme is established and updated as required (monthly for water levels) and quarterly (for water quality)</p>	-Underground Exploration/ Mining Manager - SHE Officer / Geologist	Throughout the project cycle

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
Water Resources Use	Over-abstraction (water demand and availability)	<p>-Water should be used efficiently, and reuse/recycling methods should be implemented as far as practicable onsite.</p> <p>-Water conservation awareness and training should be provided to all the project workers.</p>	<p>-Water supply agreements are in place</p> <p>-Water permits are obtained</p> <p>-inspection of water storage tanks on site</p>	-SHE Officer / Geologist	<p>Throughout the project cycle</p> <p>Once off supply agreement</p>
	Groundwater quality	<p>-At least 2 monitoring boreholes should be installed 500m downstream of the TSF (north) and 1 borehole upstream (south) to monitor the impact of the TSF on groundwater.</p> <p>-Boreholes in and around the Mine should be incorporated into Mine's Groundwater Monitoring Network. Water quality should be done on and around the Mine on a quarterly basis. The water quality analysis should be recorded into the monitoring database.</p> <p>-External auditing of the Groundwater monitoring program should be done by an external hydrogeologist/geologist on a bi-annual basis.</p> <p>-The water samples results should be analysed or verified by an external laboratory before entered in the database.</p>	-There is a Groundwater Monitoring Program and managed as prescribed and or stipulated by the regulatory authorities	-SHE Officer assisted by the Geologist / Hydrogeologist	Throughout the project cycle, as per the prescribed intervals / frequencies
Land subsistence induced by different rock	Excessive groundwater pumping	-The geotechnical stability of the underground should be monitored daily and data collected for analysis to act on time when and as needed.	-Geotechnical and hydrogeological monitoring stations	-Underground Exploration/ Mining Manager	Throughout the project cycle

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
damage mechanisms	trigger ground movement	<p>-The hydrogeological conditions of the underground workings should be constantly monitored to ensure the balance between exploration/mining operations and rock stability.</p> <p>To mitigate against land subsistence, the following methods are recommended (as per:</p> <p><u>-Grouting filling method:</u> For a jointed rock mass and cavity, the grouting filling method (GFM) has been a highly effective method to control land subsidence. This GFM principle includes goaf-stowing with cement materials (GSC), ash grouting (AG), and low density slurry (LDS) methods.</p>	-Regular reporting on the rock stability	-SHE Officer	
Occupational Health and safety	General health and safety associated with handling of machinery and equipment for exploration and mining	<p>-Health and safety induction trainings should be provided to all new personnel, mine visitors/inspectors and refresher training provided to all personnel on a quarterly basis, and as needed.</p> <p>-Provide personnel with adequate and appropriate personal protective equipment (PPE) such as coveralls, gloves, safety boots, earplugs, dust masks, safety glasses, and hard hats.</p> <p>-Ensure that ventilation systems are properly installed and frequently maintained to ensure efficiently, thus, preventing untimely failure which would compromise the health and safety of staff.</p>	<p>-Comprehensive health and safety plan for all activities compiled.</p> <p>-Occupational Health and Safety Personnel Health and Safety Trainings</p> <p>-Well-furnished first aid kits</p> <p>-Trained worker to administer first aid</p>	<p>-Proponent</p> <p>-Underground Exploration/ Mining Manager</p> <p>-SHE Officer</p>	Throughout the project cycle and trainings offered as and when required

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
		<p>-The underground working walls should be safely secured to ensure safety of staff is not compromised due to unstable overburden and walls.</p> <p>-Commit to making provision for regular full medical check-ups to monitor the impact of project related activities on staff.</p> <p>-Heavy vehicle, equipment and fuel storage site should be properly secured, and appropriate warning signage placed where visible.</p> <p>-Project personnel should be provided with an awareness training of the risks of mishandling equipment and materials on site as well as health and safety risk associated with their respective jobs.</p> <p>-An emergency preparedness plan should be compiled, and all personnel appropriately trained.</p> <p>-Personnel must not be allowed to consume any intoxicants while working, nor allowed onsite when under the influence.</p>			
	Accidental fire outbreak	<p>-Sufficient portable, and frequently serviced fire extinguishers should be provided on site.</p> <p>-No open fires to be created by project personnel, both on the surface and underground.</p>	<p>-No open fires onsite</p> <p>-Fire extinguishers (1 per vehicle), and 1 per working site</p>	<p>-Underground Exploration/ Mining Manager</p> <p>-SHE Officer</p>	Throughout the project cycle

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
		-Potential flammable areas and structures such as fuel storage tanks should be marked as such with clearly visible signage.			
Noise and vibration	Excessive noise and vibration	<p>-Provide appropriate and sufficient PPE (such as earplugs) to protect workers from noise.</p> <p>-Regular maintenance of equipment, machinery and vehicles to reduce noise arising from malfunction..</p> <p>-Shut down vehicle engines and blasting/drilling equipment when not in use to reduce noise levels.</p> <p>-Conduct noise measurements from different prevailing noise levels and recommending appropriate mitigation measures.</p>	<p>-Sufficient appropriate PPE</p> <p>-Regular servicing of vehicles and equipment</p> <p>-Noise management procedures in place</p>	<p>-Underground Exploration/ Mining Manager</p> <p>-SHE Officer</p>	Throughout the project cycle
Littering and waste management (general waste and sanitation)	Environmental Pollution (solid and hazardous waste)	<p><u>Existing Kombat Dumpsite</u></p> <p>-Consider upgrading the Kombat dumpsite and have an environmental management plan (EMP) developed for it to obtain an ECC. Given the fact that the previously used fencing material has been removed by some locals, it is recommended that steel-pole fencing (like the fencing around the Oshakati Town Council dumpsite) is used to prevent vandalism of mesh wire.</p> <p>-Consider collaborating with the town's local authorities to identify another site for waste for the town and the mine,</p>	<p>-No visible litter within and around the working areas</p> <p>-Provision of sufficient waste storage containers</p> <p>-Waste management awareness</p> <p>-Waste disposal permits to municipalities</p>	-SHE Officer	Throughout the project cycle

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
		<p>away from a busy route in order to prevent visual nuisance and public health hazards.</p> <p><u>Kombat Mine waste management</u></p> <ul style="list-style-type: none"> -Project personnel should be sensitized to dispose of waste in a responsible manner. -Ensure that there is no waste left at the working sites at the end of each day. -All domestic and general operational waste produced daily should be contained onsite until such that time it will be transported for disposal to the nearest designated waste management sites. -Pollutants such as hydrocarbons (fuels) should be contained on site and disposed of in accordance with hazardous disposal standards to prevent groundwater pollution -Burying and burning of waste onsite is prohibited. -Working sites should be equipped with separate waste bins for different waste types. -A penalty system for irresponsible disposal of waste on site and anywhere in the area should be implemented. -An emergency plan should be available for major/minor spills at the site and during the transportation of the product(s) such as fuel to site. 	<p>-Environmental, Health and Safety Statements and Policy</p>		

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
		-Ensure careful storage and handling of fuels on site.			
	Wastewater generated by personnel onsite	<p>- Any sewage waste from portable toilets at sites should be stored as per the facility manufacturers specifications and regularly disposed of at the nearest treatment facility.</p> <p>-Wastewater should be contained on site and disposed of in accordance with local wastewater discharge standards to prevent groundwater pollution.</p> <p>-Provide sufficient and functioning toilet facilities for workers (mobile/portable chemical toilets at sites that are not on the mine).</p> <p>-Open defecation is not allowed on surface nor underground areas. Make use of provided toilets.</p>	<p>-Adequate toilet and basic ablution facilities.</p> <p>-Sewage removal operator</p> <p>-Waste treatment agents/chemicals</p>	<p>-Underground Exploration/ Mining Manager</p> <p>-SHE Officer</p>	Throughout the project cycle
Soils and water resources	Soils and water resources pollution	<p><u>Soil pollution</u></p> <p>-Spill control preventive measures should be in place on site to management soil contamination.</p> <p>-Project personnel should be sensitized on the impacts of soil pollution and advised to follow appropriate fuel delivery and handling procedures.</p> <p>-Develop and prepare countermeasures to contain, clean up, and mitigate the effects of an oil spill.</p> <p>-Ensure basic Spill Prevention, Control, and Countermeasure (SPCC) Plan training for all personnel.</p>	<p>-No complaints of pollutants on the soils and eventually in the water due to mining activities</p> <p>-No visible oil spills on the ground or pollution spots.</p> <p>-Waste containers provided at mining work sites</p>	<p>-Underground Exploration/ Mining Manager</p> <p>-SHE Officer</p> <p>-SHE Officer</p>	Throughout the project cycle

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
		<p>-Project machinery and equipment should be equipped with drip trays to contain possible oil spills.</p> <p>-Polluted soil and rocks should be removed immediately and put in a designate waste type container for later disposal.</p> <p>-Drip trays must be readily available to contain accidental fuel spills.</p> <p>-Fuel polluted rock must be cleaned up, and soils collected and transported away from the site to an approved classified hazardous waste treatment facility.</p> <p>-Washing of equipment contaminated hydrocarbons, as well as the washing and servicing of vehicles should take place at a dedicated area (impervious surface) on the ground surface (not underground), where contaminants cannot contaminate soil or water resources.</p> <p><u>Water Pollution</u></p> <p>-The tailings storage facility should be lined, so that soluble substances from waste does not leach into groundwater systems.</p> <p>-Hydrocarbons, and other potential pollutants associated with the project should be contained on site in designated containers and disposed of at nearby approved wastewater treatment facilities so that they do not get into groundwater bodies (systems).</p>	<p>-Non-permeable material to cover the ground surface at areas where hydrocarbons and potential pollutants are utilized.</p>		

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
		<p>-Site areas where hydrocarbons will be utilized, the surface should be covered with an impermeable plastic liner (e.g., a High-density polyethylene (HDPE) liner), carefully placed to minimize risk of puncturing, to prevent any spillages from getting into direct contact with the soils and prevent eventual infiltration into groundwater.</p> <p>-Spill control preventative measures should be put in place to manage soil contamination, thus minimizing the contamination from reaching water bodies via the leaching of hazardous waste.</p> <p>-Should the Proponent consider discharging wastewater/effluent into the environment, they should apply for and obtain an Effluent Discharge Permit from the Water Environment Division of MAWLR prior to discharging the effluent or wastewater into the environment (whether on or offsite).</p>			
Vehicular traffic safety	The risk of accidents underground and surface	<p><u>Underground</u></p> <p>-The lighting system of the underground vehicles should be properly installed and regularly checked to prevent accidents owing to poor visibility.</p> <p>-Vehicles should be regularly serviced to ensure their adequate functionality.</p>	<p>-The vehicular traffic safety measures are in place and adhered to</p> <p>-Very little to no accidents recorded</p> <p>-All drivers and operators are in possession of</p>		

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
		<p>-The drivers and operators of different vehicles and machinery should be in possession of valid and appropriate licenses, respectively.</p> <p>-The on site speed limits should be adhered to.</p> <p>-Install enough and clearly visible traffic signs.</p> <p>-No driver or operator under the influence is allowed onsite.</p> <p><u>Surface vehicular traffic</u></p> <p>-Vehicles drivers should be in possession of valid and appropriate driving licenses and adhere to the road safety rules.</p> <p>-Drivers should drive 30km/hour onsite and be on the lookout for people and animals on roadsides.</p> <p>-Ensure that access roads are well equipped with temporary road signs conditions to cater for vehicles.</p> <p>-Vehicles should be in a road worthy condition and serviced regularly to prevent accidents from mechanical faults.</p> <p>-Vehicle drivers should not be allowed to operate vehicles while under the influence of any intoxicants.</p> <p>-To control traffic movement in the area, deliveries from and to site should be done optimally during weekdays between of 8am and 5pm.</p>	<p>required respective document</p>		

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
Social Nuisance	Flocking of outsiders into Kombat in searching of jobs	<p>-Invest in the training of locals (Kombat residents) and prioritize their employment for all jobs they can do/trained for to reduce the number of outsiders in the Settlement.</p> <p>-Non-resident personnel who are employed at the Mine (for their unique work skills) should respect the local values and norms to co-exist in harmony with the local communities.</p>	<p>-Less outsiders employed by Trigon</p> <p>-Correct and fair recruitment procedures are followed and practised.</p> <p>-More local people are employed for both skilled, semi and unskilled works</p> <p>-non-resident only employed for specialized skills that are not locally available.</p>	-Proponent: Human Resources Unit	Throughout the project cycle

5.3 Rehabilitation

Rehabilitation is a costly process, and opportunities to repeat unsuccessful rehabilitation works are often limited, so it is important that work consistently achieves acceptable outcomes. To be successful, rehabilitation programs must follow a number of steps² as shown in Figure 2 below.

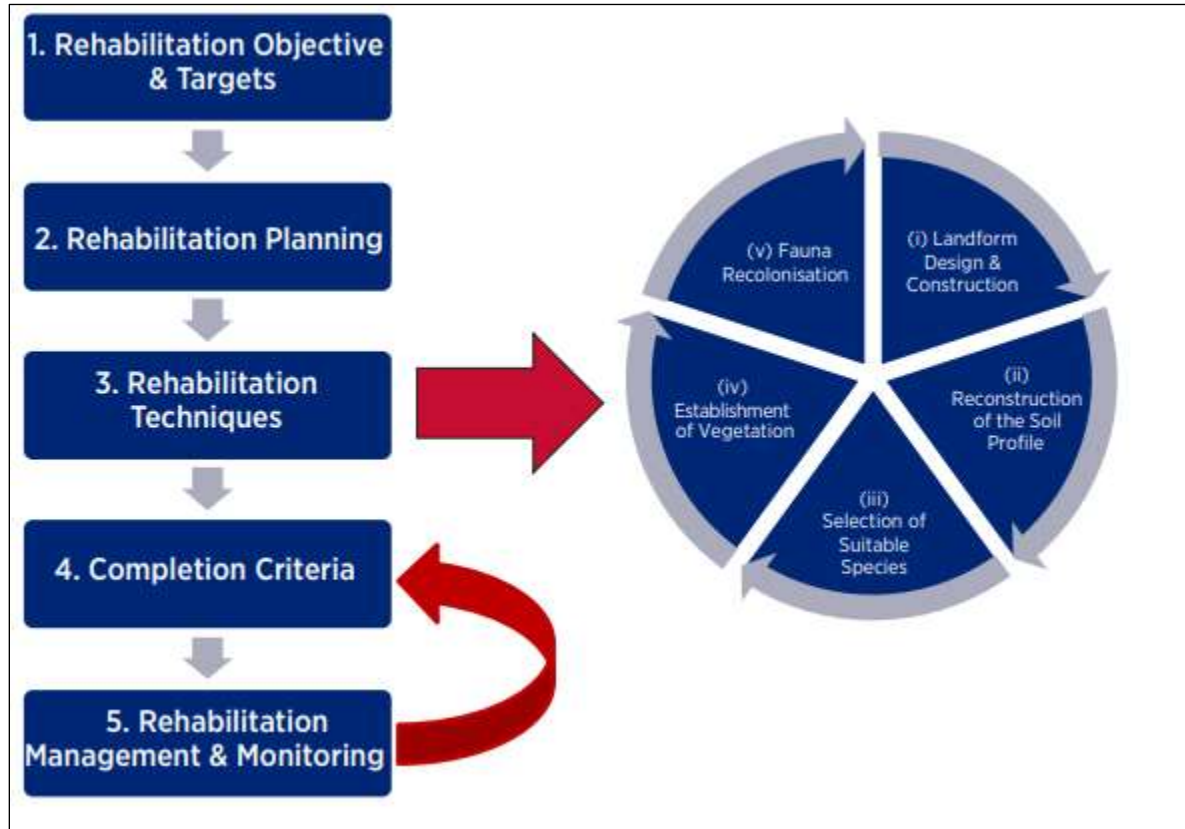


Figure 2: Rehabilitation program stages

(Australian Government, 2016)

The scale and type of exploration and mining methods, together with local environmental factors, affect a mine site's ability to achieve its rehabilitation targets and objectives. The rehabilitation guidelines provided in the Mine Rehabilitation Handbook referred to herein mainly deals with rehabilitation of surface mining. For the Kombat Mine the focus of this EMP is on surface and underground exploration.

² Australian Government. (2016): Mine Rehabilitation: Leading Practice Sustainable Development Program for the Mining Industry. <https://www.industry.gov.au/sites/default/files/2019-04/lpsdp-mine-rehabilitation-handbook-english.pdf>

5.3.1 Decommissioning and Rehabilitation Measures: Post-Rehabilitation & Post- Mining Activities

The management measures to be implemented (for rehabilitation) after the cessation of exploration activities at Kombat are provided in Table 6 below. It should be noted that rehabilitation of a mine after cessation of activities does not just happen right after exploration or mining has stopped, but it is a progressive exercise that needs planning, implementation and monitoring over time. Therefore, a Mine Closure Framework will need to be developed and regularly updated throughout the life of mine.

Rehabilitating the MLs where exploration activities have occurred underground might be less challenging compared to surface exploration, where the exploration footprint is visible on surface.

It should be noted that Trigon Mining is solely responsible for the rehabilitation of the MLs and associated infrastructure, as deemed necessary.

Table 6: Rehabilitation Measures for post exploration and post-mining activities

Aspect	Management and Mitigation Measure(s)	Implementation Responsibility	Timeline
Overall Underground Mine and associated services and structures			
Finance and technical resources: Lack of funds and technical planning for closure	-Provision of both financial and technical resources for progressive rehabilitation and post-mining activities should be made. -Annual Update of the Rehabilitation Fund -Develop a Mine Closure Framework and update regularly throughout the mining phase.	-Trigon Mining Namibia	Throughout the project cycle
Electrical cables	-Electrical cables should be carefully dismantled and transported to the surface for appropriate storage at designated facilities	-Trigon Mining Namibia	Post-mining / upon closure

Aspect	Management and Mitigation Measure(s)	Implementation Responsibility	Timeline
Dewatering systems	-Pump stations and pipelines should be turned off and disconnected, respectively. These should be disassembled and transported to the surface for safely storage at the appropriate storage sites.	-Trigon Mining Namibia	Post-mining / upon closure
Water supply systems	-The water supply pipelines and tanks should be disconnected for transportation to surface for storage in appropriate storage facilities.	-Trigon Mining Namibia	Post-mining / upon closure
Solid waste, sewage and fuel storage tanks	-All waste created leading to the last day of mining should be carried to the surface for disposal at the nearest respective waste management and treatment facilities.	-Trigon Mining Namibia	Post-mining / upon closure
Processing Plant	-The processing Plant services should be dismantled for resale to relevant users and un-reusable/hazardous services and infrastructure should be disposed of at the hazardous waste management facility, preferably in Windhoek.	-Trigon Mining Namibia	Post-mining / upon closure
Tailings Storage Facility (TSF)	-The TSF area should be treated and levelled (stabilized) to be used for re-vegetation. The vegetation on TSF post-mining should be done on advice of a Botanist to select the type of vegetation to be used for rehabilitation to promote plan growth and reduce visual nuisance of the TSF. -Stockpiled topsoil associated with the tailings storage facility (TSF) should be levelled.	-Trigon Mining Namibia	Post-mining / upon closure

Aspect	Management and Mitigation Measure(s)	Implementation Responsibility	Timeline
Surface Exploration	<ul style="list-style-type: none"> -Backfill any trenches or pits in such a way that subsoil is replaced first, and topsoil replaced last. -Close off and cap all exploration drilling boreholes. The boreholes should not only be filled with sand alone, as the wind may scour the sand and re-establish the holes. - Remove all waste generated from the site. -Transport all machinery and equipment as well as vehicles to designated offsite storage facilities. 	-Trigon Mining Namibia	Progressively throughout exploration
Surface infrastructures: buildings (offices) and services	<p><u>Infrastructure for Potential Beneficial re-use</u></p> <ul style="list-style-type: none"> -Compile an inventory of infrastructure and equipment to potentially remain at closure, aligning to end land use plan. -Obtain legal authorisations for infrastructure to remain and be transferred, and finalise agreements with third parties, along with transfer schedule <p><u>Service infrastructure to be removed</u></p> <ul style="list-style-type: none"> -Remove all equipment that can be profitably removed for salvage or resale. -Dismantle/demolish infrastructures such as offices, tanks, ablution container; water storage container/tank. -Decontaminate hazardous waste storage tanks and containers at a dedicated decontamination bay in the nearest town with capable facilities. 	-Trigon Mining Namibia	<p>Post-mining</p> <p>Progressively after closure</p>

Aspect	Management and Mitigation Measure(s)	Implementation Responsibility	Timeline
	<p>-Demolish and excavate concrete foundations to 1 m below ground level. Alternatively, and in appropriate instances the concrete slabs of “clean” infrastructure (not processing infrastructure) can be covered with a 1,000mm soil cover as part of site re-profiling and integrated into the surrounding topography.</p> <p>-Backfill excavations of disturbed infrastructure footprint areas through a cut to fill action.</p> <p>-Shape and profile the disturbed surface areas to match surrounding topography and to ensure free drainage, thus limiting run-off erosion.</p> <p>-With the help of a Botanist, establish vegetation species that mimic the surrounding flora by collecting seed from pristine bush and shrub land and actively planting before the wet season.</p> <p><u>Measures relating to transport Infrastructure</u></p> <p>-Agreements will be put in place between the Proponent, affected farmers and Kombat Settlement Council for roads to remain post closure for beneficial use by locals.</p> <p>-Roads that will no longer be used by locals post-closure will be closed off to avoid re-creation of tracks over such areas, re-establish natural drainage, including the removal of culverts and/or trenching, and profile to be free draining and emulating the surface topography.</p>		

Aspect	Management and Mitigation Measure(s)	Implementation Responsibility	Timeline
Groundwater and surface management and monitoring	-Continue with the monitoring of groundwater at least for a period of 2 years or as further required by the MAWLR to monitor the recovery of the aquifer post-cessation of mining related dewatering	-Trigon Mining Namibia	Post-mining / upon closure



Environmental Audit Report for Exploration Activities on Mining Licenses No. 73B, 73C, 16, 9, and 21 Located at Kombat in the Otjozondjupa Region

ECC Number: ECC- 01087

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1 INTRODUCTION

1.1 Project Background

The Kombat Mine is located at Kombat Town on the southern margin of the Otavi Mountain Range in the Otjozondjupa Region. The mine is a past-producing copper, lead and silver mine that was intermittently in operation from the early 1900s to 2007, and has been on care and maintenance since early 2008. The Mine intends to expand its operations by undertaking exploration and mining works.

This environmental audit report is prepared on behalf of Trigon Mining (Namibia) (Pty) Ltd (*Trigon Mining* or *The Proponent*), the holder of Mining Licenses (MLs) 73B, 73C, 16, 9, and 21. Trigon Mining was issued an Environmental Clearance Certificate (ECC-01087) on 16 November, 2020, to permit exploration works on the MLs until 16 November 2023.

This environmental audit report provides a summary of the environmental performance on the exploration activities on the MLs for the duration of the ECC (ECC-01087). The environmental audit report is prepared as per the requirements of the Environmental Impact Assessment (EIA) Regulations No. 30 of 2012 gazetted under the Environmental Management Act, (EMA), 2007, (Act No. 7 of 2007), and a condition of the Environmental Clearance Certificate (ECC) issued for works on the EPL.

The ECC is granted for exploration activities on the MLs. A summary of the Mining Licenses is presented in **Table 1** below, and the locality map in **Figure 1**.

Table 1: Mining License Summary

MINING LICENSE	SIZE (ha)	Prospective/Target Commodity
73C (The Gross Otavi project)	262.28	Base and Rare Metals; Precious Metals
73B (Old Kombat Copper mine)	150.1931	Base and Rare Metals; Precious Metals
16 (Old Kombat Copper mine)	467.6958	Base and Rare Metals

9 (Old Kombat Copper mine)	74.1239	Base and Rare Metals; Non-Nuclear Fuel Minerals; Precious Metals; Precious Stones; Semi-Precious Stones
21 (The Harasib project)	264.1346	Base and Rare Metals

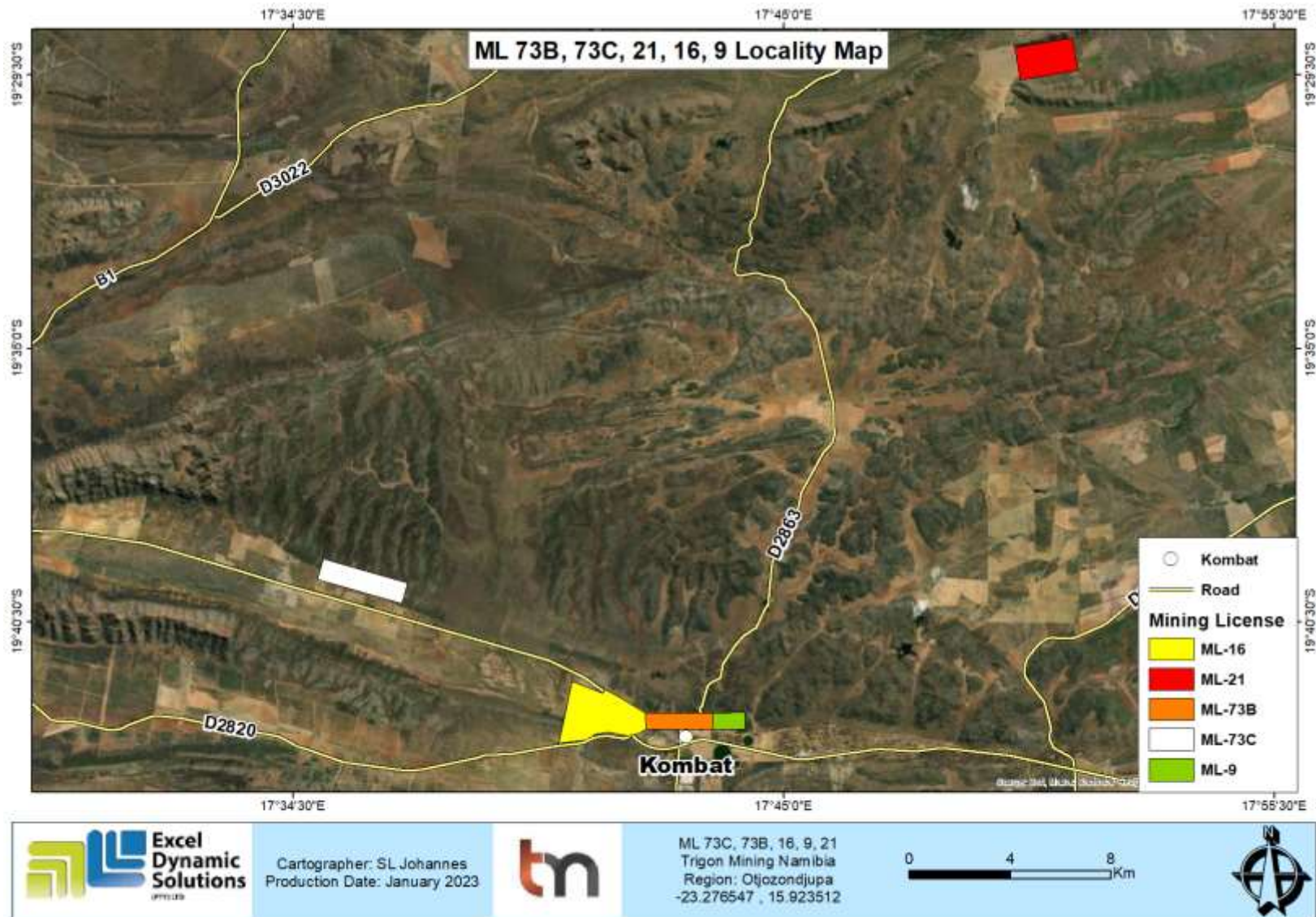


Figure 1: Locality Map (MLs 73C, 73B, 16, 9 & 21)

1.2 Purpose of the Environmental Compliance (Audit) Report

An Environmental Audit Report provides the link between the impacts identified in the EIA Process and the required environmental management on the ground during project implementation and operation, as assessed during compliance monitoring.

The compilation of this Environmental Audit Report is one of the requirements (scope of work) presented to EDS by Trigon Mining, to ensure environmental compliance with reference to the Environmental Management Plan (EMP), which is prepared as a legal requirement by Section 8 of the Environmental Management Act (EMA), No.7 of 2007 and its 2012 Environmental Impact Assessment (EIA) Regulations.

1.3 Appointed Environmental Assessment Practitioner

Trigon Mining have appointed Excel Dynamic Solutions (Pty) Ltd as the external Environmental Control Officer (ECO) to ensure EMP compliance, with the conditions of authorization, in performing environmental monitoring and auditing, in order to produce the environmental compliance report.

2 EMP ROLES AND RESPONSIBILITIES

As the EPL holder, Trigon Mining is ultimately responsible for the implementation of the EMP, and has delegated the responsibility for the effective implementation of the Updated EMP to Excel Dynamic Solutions (Pty) Ltd.

2.1 Environmental Management Action Plan and Audit

The aim of the Action Plan 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. It is, therefore, important for the Proponent/Environmental Manager to be sure to adhere to the management actions.

The responsible persons at Trigon Mining must assess these commitments in detail and acknowledge their commitment to the management actions detailed in the EMP. The compliance, thereof, is measured in **Table 3**.

2.2 Key Potential Environmental Impacts to be managed

From the EIA conducted for the MLs, the following key potential negative impacts have been identified as outlined in **Table 2** below:

Table 2: Potential Negative Impacts

ASPECT	POTENTIAL ENVIRONMENTAL IMPACT
Clearing of vegetation and soil stripping (earthmoving equipment)	Potential impact on biodiversity (physical impacts and general disturbance) <ul style="list-style-type: none"> • Loss of habitat • Loss of biodiversity • Loss of fertile soil • Spread of alien invasive plant species
	Potential impact on archaeological sites: <ul style="list-style-type: none"> • Destruction and loss of archaeological sites
Health and Safety risks associated with excavations and heavy machinery and equipment	Increased risk of Injury/fatality to third parties or animals: <ul style="list-style-type: none"> • Falling/trapped in the open pit, • Relating to activities associated with the TSF and WRDs.
Hydrocarbon spills from use of machinery, vehicles and equipment.	Impact on surface water and groundwater water quality.
Reduced storm water flow caused by open cast pits	Hydrological regime alterations: <ul style="list-style-type: none"> • Loss of surface water flow volume as an important ecological driver due to a reduction to the downstream flow.

Drilling, blasting, loading and vehicle movement causing dust	Increase in dust levels/health impacts <ul style="list-style-type: none"> • Nuisance / Air pollution • Increased risk of respiratory diseases
Noise from drilling and vehicles.	Increase in disturbing noise levels (nuisance) <ul style="list-style-type: none"> • Noise pollution
Windblown dust from the WRDs, soil stockpiles and TSF	Increase in dust levels/health impacts <ul style="list-style-type: none"> • Nuisance / Air pollution • Increased risk of respiratory diseases
The operation of the WRDs and TSF may potentially impact surface water flow and quality	Alteration of natural drainage patterns due to the proposed new WRDs and TSF. Contamination of surface water resources as a result of the WRD stockpiles and the TSF.
The operation of the TSF may potentially impact groundwater through seepage	Contamination of groundwater resources (via contaminated soils/surface water) as a result of the disposal of Tailings.
New WRDs, soil stockpiles and TSF	Increased visual impact
Dust and gaseous emissions from vehicles, crushing and screening activities	Increase in dust levels (nuisance & health impacts)
Oil spillages from haulage vehicles and other equipment	Impact on surface water and groundwater water quality.
The operation of the processing facility may potentially impact on groundwater and surface water quality as a result of spills/leaks from the processing plant.	Contamination of groundwater and surface water resources
Increase in vehicular movement	Increased traffic impacts on the roads and the intersection to the mine access road.
Waste disposal	Emissions to land, impact on biodiversity, environmental degradation and nuisance impacts
Sewerage management	
Economic impacts	Impacts on local economy, informal settlements, <ul style="list-style-type: none"> • Increased employment opportunities • Opportunity for skills transfers • Improvement in the business environment • increasing pressure on government services, • increased demand for basic infrastructure,
In-migration and community health /safety and security	

Abstraction of ground water (dewatering)	Reduction of groundwater levels due to dewatering of the shaft and pits impacting on other groundwater users.
Discharge of Dewatering from Mine pits causes pollution of Surface Water	Discharge of Dewatering from Mine pits causes pollution of Surface Water

3 ENVIRONMENTAL AUDIT

3.1 Project Activity Summary and Compliance Audit

The current baseline is expected to be reviewed and progress inspected according to the EMP provided as part of the application for the ECC (ECC – 01087), rendering compliance report a requisite part of environmental monitoring on the MLs. At the time of conducting this environmental compliance audit, no exploration activities are taking place on MLs 73c, 73b, 16, 9 and 21.

Focus during the three-year period of ECC-01087 has been on the restart of the open pit (ML73B), including an ongoing exploration program. The exploration program (drilling) commenced in June 2021. In July 2022, Trigon Mining pause operations of open pit mining due to a decline in the target commodity price, issues with start-up of the mine plant, and a shortfall in working capital.

Trigon Mining plans to continue with surface exploration on ML73B to further define the open pit resource and to determine expansion potential of the current pits. An intensive drilling program was conducted on ML 73B (Kavango Trend) between August 2022 and April 2023 to generate a geological model and a mine plan for the area.

In May 2023, open pit mining on ML 73B (Kavango trend - Kavango, Kavango North, E400 and Ore Capping pits) recommenced. With the open pit now in production, exploration focus will shift to the restart of the underground, starting with Asis West shaft (ML73B) in 2024, followed by Asis Far West shaft (ML16) in 2025, which will require both surface and underground exploration on these licences.

Concurrently over the upcoming period, surface exploration will be undertaken to determine the potential for classification of a resource at Gross Otavi (ML73C).

3.2. Environmental Management Action Plan (Audit

The management action plan recommended for this phase is presented in **Table 1** below.

Table 3: Management Action Plan for Exploration Activities on MLs 73C, 73B, 16, 19 & 21

Environmental Feature	Management Actions	Observations	Compliance comment	Corrective Action/Recommendation
Socioeconomic Land Use (Stakeholder Consultation/Communication MP)	<ul style="list-style-type: none"> A representative database including government, employees, service providers, contractors, farmers, local communities (specifically the residents of the town of Kombat and Kombat Town Caretakers), NGOs, shareholders, customers, the investment sector, community-based organisations, suppliers and the media + marginalised and vulnerable groups 	A comprehensive Stakeholders list. + Proven by mining/exploration public meeting attendance	COMPLIANT	N/A
	<ul style="list-style-type: none"> Maintain and update the Kombat Project stakeholder register to ensure that all relevant stakeholder groups are included. 	Stakeholders and residents are updated	COMPLIANT	N/A
	<ul style="list-style-type: none"> Record partnerships with local suppliers and investors as well as their roles, responsibilities, capacity and contribution to development. 	Partnerships established	COMPLIANT	N/A

Environmental Feature	Management Actions	Observations	Compliance comment	Corrective Action/Recommendation
	<ul style="list-style-type: none"> Devise and implement a stakeholder communication and engagement strategy. Meetings with the Kombat Town Caretakers and other relevant Town representatives and immediate Farmers will be carried out. 	Established	COMPLIANT	N/A
	<ul style="list-style-type: none"> Keep identified stakeholders informed about the mine's activities and use appropriate communication channels to consult with, and disseminate information to, the identified stakeholder groups 	Established	COMPLIANT	N/A
	<ul style="list-style-type: none"> Develop and implement a concerns/complaints (grievance) process for stakeholders and publicise the channels through which issues can be submitted to Trigon. 	Established.	COMPLIANT	N/A
	<ul style="list-style-type: none"> Through appropriate communication and inductions, provide information to educate third parties about the dangers associated with hazardous excavations, infrastructure and movement of exploration/mining vehicles. 	Inductions established and provided to all personnel likely to be exposed to safety risks.	COMPLIANT	N/A

Environmental Feature	Management Actions	Observations	Compliance comment	Corrective Action/Recommendation
Safety & Security	<ul style="list-style-type: none"> During the operations (including land clearing and limited construction activities) and decommissioning phases, barriers and/or warning signs will be used to keep people and animals away from the project. In this regard, a high security fencing and security access control will be provided around the project areas 	Warning signs and barriers on site.	COMPLIANT	N/A
	<ul style="list-style-type: none"> Security control will be in place at the access point to prevent uncontrolled vehicle and pedestrian access to existing and future mining, processing, stockpile and waste facility areas during the construction, operation and decommissioning phases. 	Security Control at mine access point.	COMPLIANT	N/A
	<ul style="list-style-type: none"> Security and safety personnel will manage access to the site. Third parties and/or animals found in potentially risky situations will be managed by the relevant mine personnel 	Security Control at mine access point	COMPLIANT	N/A
	<ul style="list-style-type: none"> All project workers must refrain from disturbing and destroying any floral components such as the roots of Fig trees (Ficus spp) found underground. 	Fig roots intact underground.	COMPLIANT	N/A

Environmental Feature	Management Actions	Observations	Compliance comment	Corrective Action/Recommendation
	<ul style="list-style-type: none"> Security cameras at strategic location to be considered for security . 	Established	COMPLIANT	N/A
	<ul style="list-style-type: none"> Operate an alcohol-free and drug-free site and include random testing of employees/contractors on entry to site, at the beginning of shifts and at any time on duty. 	Intoxicants are not allowed on site and workers under the influence are prohibited from entering site/operations	COMPLIANT	N/A
	<ul style="list-style-type: none"> Develop a detailed fire management policy and ensure all employees/contractors are regularly drilled. 	Established	COMPLIANT	N/A
	<ul style="list-style-type: none"> Ensure all security personnel are well vetted and well trained 	Established	COMPLIANT	N/A
	<ul style="list-style-type: none"> All legal health and safety requirements are implemented when transporting hazardous chemicals on site. 	The hazardous waste is limited in exploration activities and handled with care	COMPLIANT	N/A
	<ul style="list-style-type: none"> Transport companies will comply with all legal requirements for the handling and transport of hazardous substances. 	Hazardous substances are handled with care on site, and transported in appropriate containers.	COMPLIANT	N/A

Environmental Feature	Management Actions	Observations	Compliance comment	Corrective Action/Recommendation
	<ul style="list-style-type: none"> Major spillage incidents will be handled in accordance with the Kombat mine emergency response procedure. Any significant spills will be reported to DWA within 24 hrs and corrective action taken. 	No major spills occurred on site in this period.	COMPLIANT	N/A
	<ul style="list-style-type: none"> Induct all relevant employees and contractors in the mine's spillage management procedure 	Inductions established and provided to all personnel likely to be exposed to safety risks.	COMPLIANT	N/A
Surface Water	<ul style="list-style-type: none"> Where possible, surface water management facilities will be designed, constructed and operated so that dirty water is kept separate from clean water run-off through a system of berms, channels, trenches, flood protection measures, erosion protection or dams. 	There are surface water systems on the premises, including wastewater systems of the existing processing Plant.	COMPLIANT	N/A
	<ul style="list-style-type: none"> Diverting clean offsite runoff (rain) water around potential contaminant sources with berms and drainage ditches 	There are surface water systems on the premises, including wastewater systems of the existing processing Plant.	COMPLIANT	N/A

Environmental Feature	Management Actions	Observations	Compliance comment	Corrective Action/Recommendation
	<ul style="list-style-type: none"> All hazardous chemicals (new and used), dirty water, mineralised wastes, and non-mineralised wastes are handled in a manner that they do not contaminate surface water run-off or, where this is not possible, demonstrate (through regular monitoring) that the potential contamination is within acceptable limits from a human and environmental health perspective. 	Hazardous substances are handled with care on site, and transported in appropriate containers.	COMPLIANT	N/A
	<ul style="list-style-type: none"> Develop an emergency response plan to ensure fast reaction to contain and remediate pollution incidents. 	Established	COMPLIANT	N/A
	<ul style="list-style-type: none"> Ensure that contractors provide MSDS documents for all products brought to site, and that they have all the necessary hazardous protection equipment for people utilising the product, as well as the necessary equipment for the containment and clean-up of the environment in the event of a spill. 	Established	COMPLIANT	N/A

Environmental Feature	Management Actions	Observations	Compliance comment	Corrective Action/Recommendation
	<ul style="list-style-type: none"> Establish and maintain concrete or lined impermeable bunded areas around diesel generators, hazardous material stores, wash bays, workshop floors etc. Ensure drainage to oil and silt sumps that are regularly cleaned. 	Established	COMPLIANT	N/A
	<ul style="list-style-type: none"> Implement and maintain hazardous materials and hydrocarbon spill management procedures. 	Established	COMPLIANT	N/A
	<ul style="list-style-type: none"> Incidental spills must be cleaned up/remediated immediately in line with spillage management procedure 	Established as part of the spillage management procedures	COMPLIANT	N/A
	<ul style="list-style-type: none"> Develop audit criteria for post rehabilitation in situ spills to ascertain when/whether the remediation has been successful 	Included as part of mitigation measures in the EMP	COMPLIANT	N/A
	<ul style="list-style-type: none"> Ensure that where mine infrastructure becomes damaged, or causes surface water contamination, that it is adequately repaired and maintained 	Established with the mine maintenance team	COMPLIANT	N/A

Environmental Feature	Management Actions	Observations	Compliance comment	Corrective Action/Recommendation
	<ul style="list-style-type: none"> Major spillage incidents that contaminate flood waters will be handled in accordance with the Trigon emergency response procedure and reported to the authorities as stipulated in the Namibian legislation 	Established	COMPLIANT	N/A
	<ul style="list-style-type: none"> Induct all employees and contractors in Trigon's spillage management procedure. 	Included as part of the induction to roles that expose employees to possible oil spills.	COMPLIANT	N/A
	<ul style="list-style-type: none"> Develop and implement a hydrocarbon remediation procedure that explains how to deal with the treatment of contaminated environments (soil and water), and train selected staff in the remediation of soils or water contaminated by hydrocarbon spills. 	Established	COMPLIANT	N/A
	<ul style="list-style-type: none"> Ensure that checking for hydrocarbon spills is included in the daily inspections 	Oil/fuel spills are included in regular inspections on site.	COMPLIANT	N/A
	<ul style="list-style-type: none"> Report spillages as per the incident management procedure and Namibian legislation. 	Incident reporting and investigation procedures are in place.	COMPLIANT	N/A

Environmental Feature	Management Actions	Observations	Compliance comment	Corrective Action/Recommendation
	<ul style="list-style-type: none"> Conduct regular monitoring to ensure that domestic effluent is not being discharged into the environment 	Regular monitoring and inspection are conducted	COMPLIANT	N/A
	<ul style="list-style-type: none"> Train operators to understand the legal requirements and how to achieve compliance 	Included in induction	COMPLIANT	N/A
	<ul style="list-style-type: none"> Ensure that any portable toilets erected for the exploration activities are working properly and are cleaned regularly, to avoid pollution to the environment, and public health issues. 	No exploration activities occurring at any remote sites requiring portable toilets yet	COMPLIANT	N/A
	<ul style="list-style-type: none"> Ensure the permit requirements by DWAF are renewed due to the changed to the facility, where required 	In the process of acquiring permits	COMPLIANT	N/A
Groundwater	<ul style="list-style-type: none"> Engineered containment of process areas, sewage treatment facility, vehicle maintenance areas, and fuel and oil storage areas. 	Established as part of the previous operations	COMPLIANT	N/A
	<ul style="list-style-type: none"> Adhere to site speed limit and traffic signage to reduce risk of vehicle accidents 	Traffic signage established	COMPLIANT	N/A
	<ul style="list-style-type: none"> Exploration vehicles to carry oil spill kits. 	Established	COMPLIANT	N/A

Environmental Feature	Management Actions	Observations	Compliance comment	Corrective Action/Recommendation
	<ul style="list-style-type: none"> Regular and effective training of employees who handle potential contaminants 	Included as part of induction and training	COMPLIANT	N/A
Air Quality	Trigon to commit to adequate air quality management planning throughout the life of the Project	Air quality management measures included in the EMP	COMPLIANT	N/A
Noise and Vibrations	<ul style="list-style-type: none"> All diesel-powered equipment and vehicles should be kept at a high level of maintenance. 	Vehicle and machinery are kept up to standard and regular maintenance occurs at workshop.	COMPLIANT	N/A

Environmental Feature	Management Actions	Observations	Compliance comment	Corrective Action/Recommendation
Biodiversity	<ul style="list-style-type: none"> Keep footprint of drilling sites as minimal as possible and enforce the operational boundaries through highly visible signs and regulatory mechanisms such as fines. 	Drilling sites are sized reasonably	COMPLIANT	N/A
	<ul style="list-style-type: none"> Unnecessary collateral damage due to large vehicles should be controlled by the environmental manager on site, particularly during development of the new facilities/sites. 	There is an environmental manager on site to carry out monitoring and inspection for day-to-day activities.	COMPLIANT	N/A
	<ul style="list-style-type: none"> Develop a policy that limits independent movements by staff into the veld outside the fenced-in mining site. Strictly prevent poaching and harvesting, including of firewood, or possession of any such natural materials. 	Included in induction and training	COMPLIANT	N/A
	<ul style="list-style-type: none"> Allow only mining personnel, service providers and construction staff, as well as registered mine visitors on site. 	only mining personnel, service providers and construction staff, as well as registered mine visitors are allowed on site	COMPLIANT	N/A
	<ul style="list-style-type: none"> Train all staff to appreciate the values of biodiversity, as well as legislation relating to protected species. 	Included in induction and training	COMPLIANT	N/A

Environmental Feature	Management Actions	Observations	Compliance comment	Corrective Action/Recommendation
	<ul style="list-style-type: none"> Drivers must be licensed, and given regular awareness training on speed limits, designated tracks. Some form of speed monitoring should be implemented. Limit night time driving. 	Included in induction	COMPLIANT	N/A
Waste	<ul style="list-style-type: none"> Develop a site waste management policy and actively enforce it. 	Waste management measures included in EMP	COMPLIANT	N/A
	<ul style="list-style-type: none"> Develop policy for the management of hazardous materials and actively enforce it. 	Management of Hazardous Material included in EMP	COMPLIANT	N/A
	<ul style="list-style-type: none"> Provide temporary waste disposal facilities on site (rubbish bins, skips), which are secure from scavengers, storms, or other disturbance. 	Waste disposal facilities available on site	COMPLIANT	N/A
	<ul style="list-style-type: none"> Provide adequate toilet facilities for all workers at work sites 	Toilet/ablution facilities available on site	COMPLIANT	N/A
	<ul style="list-style-type: none"> Major spill incidents will be handled in accordance with the Trigon emergency response procedure 	Management of Hazardous Material included in EMP	COMPLIANT	N/A
Visual	<ul style="list-style-type: none"> During earthworks, all reasonable measures should be taken to prevent excessive dust. 	Dust control measures (water sprays) used in the event of excessive dust	COMPLIANT	N/A

Environmental Feature	Management Actions	Observations	Compliance comment	Corrective Action/Recommendation
	<ul style="list-style-type: none"> Implement dust control measures as per the Air Quality Management Plan. Speed limits on unpaved surfaces must be controlled to reduce dust entrainment 	Implemented. Traffic signage on site	COMPLIANT	N/A
	<ul style="list-style-type: none"> Retain as much as possible of the existing vegetation within the project area. 	Vegetation remains intact within the vicinity of the MLs	COMPLIANT	N/A
Archaeology	<ul style="list-style-type: none"> All workers (temporary and permanent) will be given training on the Chance Finds Procedure 	Chance Finds Procedure provided as part of the EMP package to include in EMP training	COMPLIANT	N/A
	<ul style="list-style-type: none"> The Chance finds Procedure must be implemented in the event of an archaeological discovery on site 	Chance Finds Procedure provided as part of the EMP package to include in EMP training	COMPLIANT	N/A
Traffic	<ul style="list-style-type: none"> Any mine related road accident must be handled in accordance with the emergency response procedure 	Inductions established and provided to all personnel likely to be exposed to safety risks.	COMPLIANT	N/A
Soil	<ul style="list-style-type: none"> Soils should preferably be handled in dry weather conditions so as to cause as little compaction as possible 	Exploration works are scheduled with consideration for weather conditions	COMPLIANT	N/A

Environmental Feature	Management Actions	Observations	Compliance comment	Corrective Action/Recommendation
Waste management	<ul style="list-style-type: none"> The waste management procedure for Trigon must cover the recycling, re-use, storage, handling, transportation and disposal. Ensure that the contractors responsible for the above are made aware of these procedures. 	Included in the EMP as part of waste management	COMPLIANT	N/A
	<ul style="list-style-type: none"> Designated waste collection points will be established on site. Care will be taken to ensure that there will be sufficient collection points with adequate capacity. Receptacles must have lids to prevent wind borne litter, or scavenging by animals. 	Waste collection sites established	COMPLIANT	N/A
	<ul style="list-style-type: none"> Determine what recycling initiatives are feasible on site and in the area. All recyclable waste must be separated at source into the relevant containers, before being removed to larger garbage skips. 	Recycling is included in the EMP as part of waste management	COMPLIANT	N/A
	<ul style="list-style-type: none"> Provide the recyclable materials to agencies that can utilise them – where possible. 	Recycling is included in the EMP as part of waste management	COMPLIANT	N/A
	<ul style="list-style-type: none"> Non-recyclable, general waste will be collected and be disposed within the existing general landfill site or new site 	General Waste is disposed of at existing landfill site	COMPLIANT	N/A

Environmental Feature	Management Actions	Observations	Compliance comment	Corrective Action/Recommendation
	<ul style="list-style-type: none"> Remove all oil, grease and petroleum products from site 	Included in the EMP as part of waste management	COMPLIANT	N/A
	<ul style="list-style-type: none"> Trigon will continue to use the existing general Landfill (waste) site, located adjacent (south) of the proposed central pit) to dispose of general / non-hazardous waste (that cannot be recycled) only. 	General Waste is disposed of at existing landfill site	COMPLIANT	N/A
	<ul style="list-style-type: none"> The landfill site is to be fenced off and access controlled. 	The landfill site is not fenced off, lacks access control, and is located along a route; making it a visual nuisance to users of the route	NON-COMPLIANT	Trigon Mining must consider collaborating with local authorities and/or consult to: -Identify a suitable site for a landfill site within the jurisdiction of Kombat

Environmental Feature	Management Actions	Observations	Compliance comment	Corrective Action/Recommendation
				-Fence off the new landfill site with sustainable / durable material in order to control access.
	<p>Dispose of waste at the on-site landfill facility as follows:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Only non-hazardous waste that cannot be recycled to be placed in the landfill facility. <input type="checkbox"/> Place the food scraps in the landfill (containment pits) in a distinct area and cover it with earthen fill daily to avoid animals being attracted and scavenging from these food scraps. <input type="checkbox"/> Compact the other waste and temporarily cover material that can become airborne from wind with a thin layer of soil/ inert waste rock. Additional refuse may be placed on top of the thin earthen fill layer and this sequence may be repeated several times. A cover consisting of 150 mm of material should be placed over the waste. 	<p>-No access control of landfill site</p> <p>-The landfill site is too shallow and might not be able to accommodate both community and mining waste once the mining project is fully operational.</p>	<p>NON-COMPLIANT</p>	<p>Trigon Mining must consider collaborating with local authorities and/or consult to:</p> <ul style="list-style-type: none"> -Identify a suitable site for a landfill site within the jurisdiction of Kombat -Fence off the new landfill site with sustainable / durable material in order to control access

Environmental Feature	Management Actions	Observations	Compliance comment	Corrective Action/Recommendation
	<ul style="list-style-type: none"> <input type="checkbox"/> Waste should rather be compacted by passing heavy equipment over the deposited waste, to reduce the voids in waste and the overall volume. Compaction is best achieved if the waste is spread in thin layers and compacted by a purpose-built landfill compactor. <input type="checkbox"/> Windblown litter must be picked up and removed from fences and vegetation. 	<p>-The landfill site is not fenced off</p>		
	<ul style="list-style-type: none"> • Oil contaminated soil will be bioremediated 	<p>Included In the EMP as part of progressive rehabilitation, in the case of high-volume oil spills</p>	<p>COMPLIANT</p>	<p>N/A</p>
	<ul style="list-style-type: none"> • Written evidence of safe disposal of waste will be kept. 	<p>Included In the EMP. Waste disposal records will be kept by the environmental department</p>	<p>COMPLIANT</p>	<p>N/A</p>

SUMMARY OF SITE OBSERVATIONS

- All the Mining Licence sites are fenced off.
- The Mining Licences have safety warning signs on site
- The Plant, Lab, Warehouse and Workshops (electrical and mechanical) (ML 73b) are well-maintained and equipment stored tidily.
- Vegetation is preserved within the vicinity of the Mining Licences, and special vegetation species such as the Ficus spp remain undisturbed, and their roots intact underground
- The Kombat landfill site is not located within the MLs boundaries, but is located near the MLs and is used by the Trigon Mining operations as well. The landfill site is located along a gravel road. It is used as a dumpsite by the community and the mine. The landfill site is not fenced off; it is open and easily accessible to residents and animals, and it is therefore, a public health hazard. as it is not fenced off, lacks access control, and is located along a route; making it a visual nuisance to users of the route.

The figures in **Appendix A** are pictures of observation of the ML sites during compliance auditing.

SUMMARY OF COMPLIANCE

As according to the existing EMP, this environmental audit has identified seventy-three (73) management actions. 71 of the management actions are observed as Compliant, and two (2), Non-Compliant.

The two issues of Non-compliance identified in this audit are both related to the landfill site, and would require a joint set of solutions/interventions. The issues of Non-Compliance identified are:

- ***The landfill site is not fenced off and is easily accessible to residents and animals, and it is therefore, a public health hazard***
- ***The landfill site is located along a route; making it a visual nuisance to users of the route***

Recommendations for corrective action are as follows:

- Trigon Mining to collaborate/partner with local authorities to identify a suitable site for a landfill site (may be conducted through a site suitability analysis and site selection process) within the jurisdiction of Kombat.

- The parties involved in the new landfill site establishment to make provision for fencing off the site with sustainable / durable material in order to control access and prevent public health hazards.

APPENDIX A

OBSERVATIONS (PICTURES) ML73C



Vegetation on the Mining Licence



Signage on the Mining Licence

OBSERVATIONS (PICTURES) MLS 73B, 16 & 9



Storage and Maintenance (Electrical Workshop)



Maintenance (Mechanical Workshop)



Maintenance (Warehouse)



Warning Signs underground



Signage that needs to be removed



Fig tree roots underground

OBSERVATIONS (PICTURES) LANDFILL SITE



OBSERVATIONS (PICTURES) ML 21



ML 21 Landscape