

**IMPLEMENTATION OF AND COMPLIANCE WITH THE ENVIRONMENTAL  
MANAGEMENT PLAN FOR THE MINING OF PRECIOUS STONES BY  
NORTHERN NAMIBIA DEVELOPMENT COMPANY (PTY) LTD IN MINING  
LICENSE (ML) 156, KUNENE REGION, NAMIBIA**



28 September 2023

Prepared by:



Prepared for:



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Annexure B:	Letter from NNDC (dated 13 April 2022) RE: Appointment of Environmental Consultant (ML156); Letter from NNDC to the Environmental Commissioner, MEFT (dated 20 April 2022) Re: APP-002733; Letter from the Office of the Environmental Commissioner, MEFT to LM Environmental Consulting (dated 12 May 2022) Subject: Application for Environmental Clearance Certificate for the Renewal Application for Mining Licence (ML) 156, Kunene Region, Namibia; Letter from NNDC to the Environmental Commissioner, MEFT (dated 22 June 2022) Re: Application of Environmental Clearance Certificate for the Mining Licence (ML) 156, Kunene Region;

Letter from NNDC to the Environmental Commissioner, MEFT (dated 23 June 2022) RE: Application of Renewal of Environmental Clearance Certificate (ECC) for the Mining License (ML) 156, Kunene Region;  
 Letter from NNDC to the Environmental Commissioner, MEFT (dated 24 June 2022) Re: APP-002733;  
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 and

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## **ABBREVIATIONS / ACRONYMS / SYMBOLS / UNITS**

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The following is a list of the abbreviations, acronyms, symbols, and units used in this Report:

ADT	Articulated Dump Truck
AIDS	Acquired Immunodeficiency Syndrome
CSR	Corporate Social Responsibility
DEA	Directorate of Environmental Affairs
DEAF	Directorate of Environmental Affairs and Forestry
DWA	Department of Water Affairs
EAP	Environmental Assessment Practitioner
EAPAN	Environmental Assessment Professionals of Namibia
ECC	Environmental Clearance Certificate
EIA	Environmental Impact Assessment
EMA	Environmental Management Act
EMP	Environmental Management Plan
EPL	Exclusive Prospecting License
GIS	Geographic Information System
ha	hectare
HIV	Human Immunodeficiency Virus
I&APs	Interested and Affected Parties
IEMA	Institute of Environmental Management and Assessment
IFC	International Finance Corporation
km	kilometre
km/h	kilometre per hour
LOM	Life of Mine
m <sup>3</sup> /day	cubic metres per day
m <sup>3</sup> /year	cubic metres per year
MAWF	Ministry of Agriculture, Water and Forestry
MAWLR	Ministry of Agriculture, Water and Land Reform
MET	Ministry of Environment and Tourism
MEFT	Ministry of Environment, Forestry and Tourism
MFMR	Ministry of Fisheries and Marine Resources
ML	Mining License
MME	Ministry of Mines and Energy
MOHSS	Ministry of Health and Social Services
MSDS	Material Safety Data Sheet
NCE	Namibia Chamber of Environment
NIMT	Namibian Institute for Mining and Technology
NNDC	Northern Namibia Development Company (Pty) Ltd
NRPA	National Radiation Protection Authority
PDAC	Prospectors and Developers Association of Canada
PM	Particulate Matter
PPE	Personal Protective Equipment
PV	Photovoltaic
RBS	Risk-Based Solutions cc
RC	Reverse Circulation
RMP	Radiation Management Plan
SA	South Africa
SCNP	Skeleton Coast National Park

STIs	Sexually Transmitted Infections
TGH	Trustco Group Holdings Ltd
UK	United Kingdom
UNAM	University of Namibia
VOC	Volatile Organic Compound



# 1 Introduction

## 1.1 Background

Northern Namibia Development Company (Pty) Ltd (NNDC) holds the mineral rights for precious stones under Mining License (ML) 156. ML156 was granted by the Ministry of Mines and Energy (MME) on 31 July 2018; the ML will expire on 30 July 2033.

Exploration in the area commenced in the mid-1940s, followed by sporadic diamond prospecting during the 1970s, 1980s, late-1990s, and the early-2000s.

Northern Namibia Development Company (Pty) Ltd started their exploration programme for diamonds in EPL 2633 in 2001 and in March 2007, Next Investments (Pty) Ltd purchased the total issued share capital of Northern Namibia Development Company (Pty) Ltd. Exploration has since been ongoing.

During 2015, resources were estimated and these were reviewed by a Competent Person in 2017. Block estimates in the Proto-Kunene and Shallow Gravel Domain have been classified as an Inferred Mineral Resource comprising 7.9 million tonnes of diamond bearing gravels at grades of 4.21 carats per hundred tonne. The Life of Mine was estimated to be ten years based on 50% of the resource being feasible for economic extraction (see Maartens, 2018).

The ML, 3405.7815 hectares (ha) in size, is located 660 kilometres (km) north of Swakopmund, in the north-western corner of Namibia's Skeleton Coast Park; it is bordered by the Atlantic Ocean (to the west), the Kunene River mouth (north-west), and the Kunene River (and Angola) (to the north) (see Figure 1).

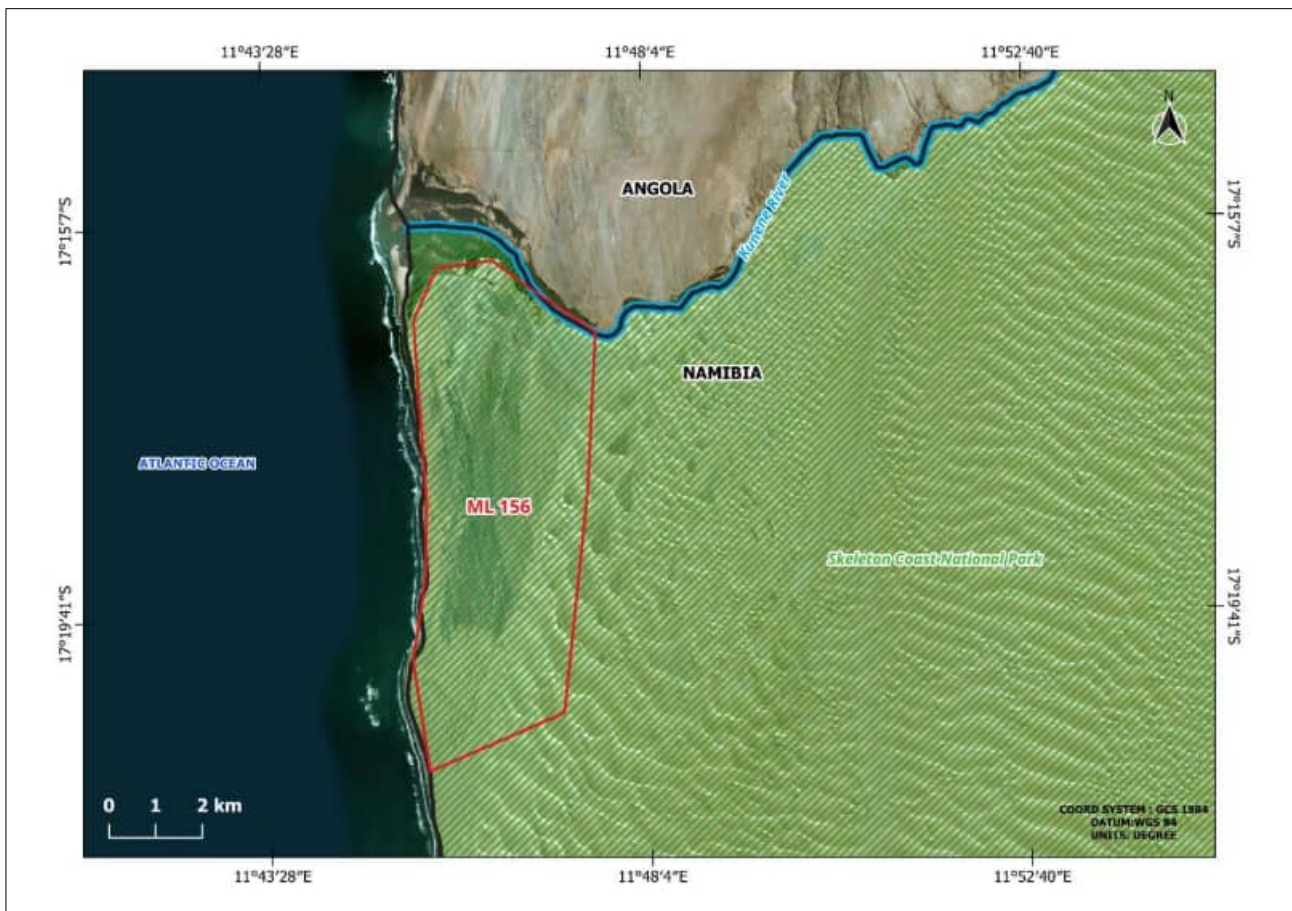


Figure 1: Map showing the location of Mining License 156, Kunene Region, Namibia (Source: A. N. Nicodemus, GIS Specialist, 12 September 2023).

Access to ML156 is attainable by 4x4 vehicle from Terrace Bay, over Möwe Bay, and from there for around 270 km along the shoreline through the Skeleton Coast National Park (SCNP). Apart from a landing strip at the Kunene River mouth, there are also landing strips for light aircraft at Terrace Bay and Möwe Bay (Gresse, 2003).

## 1.2 Terms of Reference

LM Environmental Consulting was appointed by NNDC to prepare a report, illustrating the implementation of and compliance with the Environmental Management Plan (EMP) (see Maartens, 2018), in aid of the application for the renewal of the Environmental Clearance Certificate (ECC) on 18 August 2023.

A brief history of the environmental work carried out / reports submitted the Ministry of Environment and Tourism (MET) (now Ministry of Environment, Forestry and Tourism (MEFT)) to date, is summarised in Table 1.

Table 1: Summary of the environmental work/reports submitted to the Ministry of Environment, Forestry and Tourism since 2008.

<b>Application / Report</b>	<b>Date of Submission</b>	<b>Status</b>
Environmental Impact Assessment (EIA) and an Environmental Management Plan (EMP) (Risk-Based Solutions (RBS) cc, 2008a; b)	2008	Environmental Clearance Certificate (ECC) ( <b>11 August 2008</b> )
Application for the renewal of the ECC	10 January 2013	Renewed ECC ( <b>31 January 2013</b> )
EMP for the Kunene River Mouth Landing Strip, Kunene Region, Namibia (Maartens, 2013a)	05 February 2013	The Office of the Environmental Commissioner, Ministry of Environment and Tourism (MET) noted " <i>The landing strip is located in an environmentally sensitive area. Although the EPL holder has been using the landing strip, this Ministry cannot formalize the usage of the airstrip due to the sensitivity of the area.</i> " (20 May 2013)
Bi-Annual Environmental Report for Exclusive Prospecting License 2633, Kunene Region, Namibia (Maartens, 2013b).	05, 06 February 2013	No feedback received from the Directorate of Environmental Affairs (DEA) or the Directorate Parks and Wildlife Management, MET
Bi-Annual Environmental Report for Exclusive Prospecting License 2633, Kunene Region, Namibia (Maartens, 2013c)	29 July 2013	No feedback received from the DEA or the Directorate Parks and Wildlife Management, MET
Bi-Annual Environmental Report for Exclusive Prospecting License 2633, Kunene Region, Namibia (Maartens, 2014a)	15 January 2014	No feedback received from the DEA or the Directorate Parks and Wildlife Management, MET
Bi-Annual Environmental Report for Exclusive Prospecting License 2633, Kunene Region, Namibia (Maartens, 2014b)	26 June 2014	No feedback received from the DEA or the Directorate Parks and Wildlife Management, MET
Bi-Annual Environmental Report for Exclusive Prospecting License 2633, Kunene Region, Namibia (Maartens, 2015a)	26 January 2015	Acknowledgement of receipt by the Office of the Environmental Commissioner of the bi-annual report for the period July to December 2014 (02 March 2015)
Bi-Annual Environmental Report for Exclusive Prospecting License 2633, Kunene Region, Namibia (Maartens, 2015b)	28 July 2015	No feedback received from the DEA or the Directorate Parks and Wildlife Management, MET
Implementation of and Compliance with the Environmental Management Plan for Exclusive Prospecting License 2633, Kunene Region, Namibia (Maartens, 2015c).	03 November 2015	Renewed ECC ( <b>15 April 2016</b> )
Bi-Annual Environmental Report for Exclusive Prospecting License 2633, Kunene Region, Namibia. July to December 2015 (Maartens, 2016a)	26 January 2016	No feedback received from the DEA or the Directorate Parks and Wildlife Management, MET

<b>Application / Report</b>	<b>Date of Submission</b>	<b>Status</b>
Bi-Annual Environmental Report for Exclusive Prospecting License 2633, Kunene Region, Namibia. January to June 2016 (Maartens, 2016b)	18 August 2016	No feedback received from the DEA or the Directorate Parks and Wildlife Management, MET
Bi-Annual Environmental Report for Exclusive Prospecting License 2633, Kunene Region, Namibia. July to December 2016 (Maartens, 2017)	06 February 2017	Acknowledgement by the Office of the Environmental Commissioner of the bi-annual report dated 06 February 2017: <i>"Kindly be informed that the Solar PV structure canoe (cannot) be operated without and Environmental Clearance Certificate although it is a small scale plant. Therefore, you are advised to update the Environmental Management Plan to include the operation of the Solar PV structure"</i> (10 April 2017)
Bi-Annual Environmental Report for Exclusive Prospecting License 2633, Kunene Region, Namibia. January to June 2017 (NNDC, 2017)	10 August 2017	No feedback received from the DEA or the Directorate Parks and Wildlife Management, MET
Environmental Scoping, Impact Assessment and Management Plan for the Conversion of Exclusive Prospecting License (EPL) 2633 to Mining License (ML) 156 for the Mining of Precious Stones by Northern Namibia Development Company (Pty) Ltd, Kunene Region, Namibia (Maartens, 2018)	12 March 2018	<b>ECC (13 July 2018)</b>
Bi-Annual Environmental Report for Mining Licence (ML) No. 156, Kunene Region, Namibia. June to December 2018 (NNDC, 2018).	17 January 2019	Unknown whether feedback was received from the Environmental Commissioner, MET
Bi-Annual Environmental Report for Mining Licence (ML) No. 156, Kunene Region, Namibia. January to June 2019 (NNDC, 2019)	26 and 27 June 2019	Unknown whether feedback was received from the Deputy Environmental Commissioner and Directorate of Wildlife and National Parks, MET
Bi-Annual Environmental Report for Mining Licence (ML) No. 156, Kunene Region, Namibia. June to December 2019 (NNDC, 2020a)	26 February 2020	Unknown whether feedback was received from the Environmental Commissioner, DEA and Executive Director (ED) Directorate of Wildlife and National Parks, MET
Bi-Annual Environmental Report for Mining Licence (ML) No. 156, Kunene Region, Namibia. January to June 2020 (NNDC, 2020b)	13 July 2020	Unknown whether feedback was received from the ED and Director Wildlife and National Parks, MET
Bi-Annual Environmental Report for Mining Licence (ML) No. 156, Kunene Region, Namibia. July to December 2020 (NNDC, 2021a)	29 January 2021	Unknown whether feedback was received from the Environmental Commissioner and Director Wildlife and National Parks, MET
An application for the renewal of the ECC ( <b>APP-002733</b> ) was submitted to the Office of the Environmental Commissioner, Ministry of Environment, Forestry and Tourism (MEFT), together with a report Implementation of and Compliance with the Environmental Management Plan for Mining Licence No. 156, Kunene Region, Namibia (Trustco Group Holdings (Pty) Ltd, 2021) (see Annexure A)	11 June 2021	<b>ECC (renewed ECC not yet issued; see below)</b>
Bi-Annual Environmental Report for Mining Licence (ML) No. 156, Kunene Region,	14 and 16 July 2021	Unknown whether feedback was received from the Environmental



Application / Report	Date of Submission	Status
Namibia. January to June 2021 (NNDC, 2021b)		Commissioner and Director Wildlife and National Parks, MEFT
Bi-Annual Environmental Report for Mining Licence (ML) No. 156, Kunene Region, Namibia. July to December 2021. (NNDC, 2022a)	27 January 2022	Unknown whether feedback was received from the Environmental Commissioner, MEFT
<p>On 13 April 2022, Dr Lima Maartens T/A LM Environmental Consulting was appointed as the Environmental Assessment Practitioner for the Renewal of The Environmental Clearance Certificate for Mining License (ML) 156 (see Annexure B).</p> <p>Following communication with staff from the Directorate of Environmental Affairs and Forestry (DEAF), MEFT, a letter (dated 21 April 2022) was written to the Office of the Environmental Commissioner requesting that NNDC's application APP-002733 be deleted from the online portal (see Annexure B).</p> <p>On 12 May 2022, a letter from the Office of the Environmental Commissioner re <i>Application for Environmental Clearance Certificate for the Renewal Application for Mining Licence (ML) 156, Kunene Region, Namibia</i> was sent to LM Environmental Consulting (see Annexure B).</p> <p>NNDC responded to the Office of the Environmental Commissioner re <i>Application of Environmental Clearance Certificate for the Mining Licence (ML) 156, Kunene Region</i>, CC to LM Environmental Consulting, on 22 May 2022 (see Annexure B). Two more letters were delivered to the Office of the Environmental Commissioner (27 June 2022) re <i>Application of Renewal of Environmental Clearance Certificate (ECC) for the Mining License (ML) 156, Kunene Region</i> (dated 23 June 2022) and re <i>APP-002733</i> (dated 24 June 2022) (see Annexure B). The three letters were also submitted via e-mail to Mr J. Hiwana on 27 June 2022.</p> <p>In July 2022, MEFT's online portal collapsed and all information was lost; the portal was only re-instated in October 2022.</p> <p>LM Environmental Consulting followed up with Mr D. Nchindo on 23 September 2022 (see Annexure B).</p> <p>No feedback was received from the DEAF, or the Directorate Parks and Wildlife Management, MEFT.</p>		
Bi-Annual Environmental Report for Mining Licence (ML) No. 156, Kunene Region, Namibia. January to June 2022. (NNDC, 2022b)	04 November 2022	Unknown whether feedback was received from the Director, MEFT: Wildlife and National Parks
Bi-Annual Environmental Report for Mining Licence (ML) No. 156, Kunene Region, Namibia. July 2022 to January 2023. (NNDC, 2023)	13 February 2023	Unknown whether feedback was received from the Director, MEFT: Wildlife and National Parks
<p>In August 2023, Me Linda Uulenga, Environmental Officer, Trustco Group Holdings, noted the following: "I followed up with MEFT regarding the NNDC ECC renewal application submitted June 2021. Mr. Hiwana, the assigned assessor to the application, is not in office until next week hence cannot provide a response on the matter yet. But I was advised to re-launch the ECC renewal application with an updated EMP as the 2021 application is no longer applicable."</p> <p>A "new" application for the renewal of the ECC was submitted to the Office of the Environmental Commissioner, MEFT, on 05 September 2023. The application was registered with application number <b>230905002077</b>.</p> <p>The application <b>APP-002077</b> was verified (<b>08 September 2023</b>) and MEFT requested that the following documents be uploaded: i) Updated EMP to effect amendment; ii) Confirmation of screening notice received (through email) in terms of assessment procedures (Section 35 (1)(a)(b) of the Environmental Management Act, No 7 of 2007); iii) Preliminary Site Map with coordinates (decimal degrees) and a Legend; iv) Copy of the previous Environmental Clearance Certificate issued in terms of Section 37(1)(a) of EMA; and v) CV of Environmental Assessment Practitioner (EAP) (see Annexure C: Screening Notice).</p>		

LM Environmental Consulting visited the area between 26-30 January 2013, 29-30 May 2014, 23-25 February 2015, 21-22 September 2015, 17 August 2016, and 15-18 January 2018.

### 1.3 Environmental Assessment Practitioner

The author of this Report is Dr Lima Maartens who has more than 30 years' experience in natural resource management (*she gained her doctorate (Ph.D.) in Fisheries Science from Rhodes University, South Africa (SA) while working for the Namibian Ministry of Fisheries and Marine Resources (MFMR) in 2000*), lecturing (*University of Namibia (UNAM)*), environmental science and management (*De Beers Marine Namibia and the Canadian Forsys Metals Corp*), and consulting (*LM Environmental Consulting was established by Dr Maartens in October 2009*).

Sectors that she worked in as an Environmental Assessment Practitioner (EAP) include: exploration (including offshore oil and gas); mining and quarrying; renewable energy (solar and wind); tourism; manufacturing; agriculture; aqua- and mariculture; township, property (including medicine storage facilities) and waterfront developments, transport (rail and road), and infrastructure.

Dr Maartens is registered as a Lead Practitioner and Reviewer with the Environmental Assessment Professionals of Namibia (EAPAN) (she served on the Executive Committee during 2016/17), an Associate Member and Environmental Auditor with the Institute of Environmental Management and Assessment (IEMA) in the United Kingdom (UK), a Full Member of the Namibia Chamber of Environment (NCE), and a Member of the Namibia Scientific Society.

She has published five peer-reviewed scientific research articles (and three as co-author), six popular articles (and one as co-author), one book chapter (and one book chapter as co-author), 154 technical reports (LM Environmental Consulting), three technical reports (for De Beers Marine Namibia), and one conference paper.

## 2 Environmental Management Plan: Implementation and Compliance

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### 2.1 Introduction

As part of the EMP Performance Review / Update, the following actions were carried out (comments by LM Environmental Consulting are highlighted in a green font):

- Review of the following documents made available to LM Environmental Consulting:
  - Northern Namibia Development Company (Pty) Ltd. 2018. *Bi-Annual Environmental Report for Mining Licence (ML) No. 156, Kunene Region, Namibia. June to December 2018*. Letter from NNDC to the Environmental Commissioner and Directorate of Parks and Wildlife, MET (17 January 2019; submission 17 January 2019). 3 pp;
  - Northern Namibia Development Company (Pty) Ltd. 2019. *Bi-Annual Environmental Report for Mining Licence (ML) No. 156, Kunene Region, Namibia. January to June 2019*. Letter from NNDC to the Deputy Environmental Commissioner and Directorate of Wildlife and National Parks, MET (27 June 2019; submission 26 June 2019 – stamp date assumed to be wrong – and 27 June 2019). 7 pp;
  - Northern Namibia Development Company (Pty) Ltd. 2020a. *Bi-Annual Environmental Report for Mining Licence (ML) No. 156, Kunene Region, Namibia. June to December 2019*. Letter from NNDC to the Environmental Commissioner, DEA and Executive Director (ED) Directorate of Wildlife and National Parks, MET (11 February 2020; submission 26 February 2020). 10 pp;
  - Northern Namibia Development Company (Pty) Ltd. 2020b. *Bi-Annual Environmental Report for Mining Licence (ML) No. 156, Kunene Region, Namibia. January to June 2020*. Letter from NNDC to the Executive Director and Director Wildlife and National Parks, MET: (10 July 2020; submission 13 July 2020). 7 pp;
  - Northern Namibia Development Company (Pty) Ltd. 2021a. *Bi-Annual Environmental Report for Mining Licence (ML) No. 156, Kunene Region, Namibia. July to December 2020*. Letter from NNDC to the Environmental Commissioner and Director Wildlife and National Parks, MET (15 January 2021; submission 29 January 2021). 6 pp;
  - Northern Namibia Development Company (Pty) Ltd. 2021b. *Bi-Annual Environmental Report for Mining Licence (ML) No. 156, Kunene Region, Namibia. January to June 2021*. Letter from NNDC to the Environmental Commissioner and Director Wildlife and National Parks, MEFT (09 July 2021; submission 14 and 16 July 2021). 8 pp;
  - Trustco Group Holdings (Pty) Ltd (TGH). 2021. *Implementation of and Compliance with the Environmental Management Plan for Mining Licence No. 156, Kunene Region, Namibia*. Prepared for Northern Namibia Development Company (Pty) Ltd. 15 pp;
    - Note that there are several factually incorrect statements in the report (e.g. Section 1: *Risk-Based Solutions cc was contracted by NNDC to conduct a new Environmental Impact Assess (EIA) and an Environmental Management Plan (EMP) report...* LM Environmental Consulting was contracted and not Risk-Based Solutions cc; and Section 5.1: *The International Finance Corporation (IFC) performance standards are being followed to guide the management of surface water extraction*).
    - Compliance with the ECC requirements is covered (Section 4); the section dealing with the implementation of the EMP (Section 5) is considered incomplete (see Annexure A);
  - Northern Namibia Development Company (Pty) Ltd. 2022a. *Bi-Annual Environmental Report for Mining Licence (ML) No. 156, Kunene Region, Namibia. July to December 2021*. Letter from NNDC to the Environmental Commissioner, MEFT (20 January 2022; submission 27 January 2022). 8 pp;
  - Northern Namibia Development Company (Pty) Ltd. 2022b. *Bi-Annual Environmental Report for Mining Licence (ML) No. 156, Kunene Region, Namibia. January to June 2022*. Letter from NNDC to the Director, MEFT: Wildlife and National Parks (12 July 2022; submission 04 November 2022). 6 pp; and
  - Northern Namibia Development Company (Pty) Ltd. 2023. *Bi-Annual Environmental Report for Mining Licence (ML) No. 156, Kunene Region, Namibia. July 2022 to January 2023*. Letter from NNDC to the Director, MEFT: Wildlife and National Parks (13 February 2023; submission 13 February 2023). 2 pp.

- Rapid review of the following permits made available to LM Environmental Consulting:
  - Permit (number 10 799) issued (25 August 2020) in terms of Section 56 (3) (b) of the Water Act, 1956 (Act 54 of 1956), as amended and as applicable on a public stream; abstraction of 400 cubic metres per day (m<sup>3</sup>/day) or 75,000 cubic metres per year (m<sup>3</sup>/year) from the Kunene River mouth-area between 31 August 2020 and 31 August 2025;
  - Wastewater and Effluent Disposal Exemption Permit (number 11 284; **this number is the same as the number for the permit to abstract seawater – see below**) issued (30 May 2022) in terms of Sections 21 and 22 of the Water Act, 1956 (Act 54 of 1956); the permit expires 31 May 2025 (**there is no date stamp on the permit**);
  - Permit (number 11 284; **see above**) issued (06 July 2022) for the abstraction of seawater issued in terms of Section 2(m) of the Water Act, 1956 (Act 54 of 1956), as amended and as applicable on sea water; abstraction of **200 m<sup>3</sup>/day maximum / 4,800 m<sup>3</sup>/day** from the Atlantic Ocean, Skeleton Coast Park, between 30 June 2022 and 01 February 2027; and
  - Licence (issued 18 September 2023) for the possession and use of X-ray generating equipment at ML156, Kunene Region, Namibia; the licence expires 18 September 2026.
  
- Meeting (MS Teams) with Mr Johan van Rooyen, Head Mining Operations and Development, Northern Namibia Development Company (Pty) Ltd on 26 September 2023.

## 2.2 Compliance: Environmental Management Plan

In order to illustrate compliance with the EMP (see Table 2), the following colour codes were applied:

	Compliance/Completed
	In Progress/Ongoing
	Non-compliance
	Not (Currently) Applicable
	Changes made to existing EMP
	Unknown
	Not audited

**Note that Northern Namibia Development Company (Pty) Ltd (NNDC) has been under *care and maintenance* since 2018 (see NNDC, 2018; 2019; 2020a; 2020b; 2021a; 2021b; 2022a; 2022b; 2023 and TGH, 2021).**

**Due to the global economic downturn, exacerbated by the Covid-19 pandemic, the employment of 48 NNDC staff members was terminated on 31 May 2020. A skeleton staff of seven people (six people from NNDC and one person (security) from TGH) remain at the ML156-operation (Mr Johan van Rooyen, Head Mining Operations and Development, Northern Namibia Development Company (Pty) Ltd, pers. comm.).**

Table 2: Compliance with the Environmental Management Plan for Northern Namibia Development Company (Pty) Ltd's activities (exploration/mining for precious stones, and rehabilitation/closure) within Mining License 156, Kunene Region, Namibia (also see *International Finance Corporation (IFC), 2007a, b; Prospectors and Developers Association of Canada (PDAC), 2009; (Namibian) Chamber of Mines, 2010; Maartens, 2013a; Ministry of Environment and Tourism (MET), 2013; Von Oertzen, 2017; Mrs Auriol Ashby, pers. comm., 14 February 2018; Burke, 2018; Cunningham, 2018*).

Aspect	Potential Impact	Mitigation	Compliance & Comments (September 2023)
<b>Social and Environmental Performance</b>			
Management and Monitoring	Social and Environmental Performance	<p>Adhere to all Namibian Legislation, including the Management Plan for the Skeleton Coast National Park, and Best Practice Requirements.</p> <p>Ensure that all aspects related to the <b>Environmental Management Plan</b> (EMP) are implemented during the exploration/mining and rehabilitation/closure phases.</p> <p>Hold regular site meetings/inspections. Make provision in the minutes of the meetings for reporting on all aspects of the EMP related to the exploration/mining and rehabilitation/closure phases.</p>	<p>Ongoing; Northern Namibia Development Company (Pty) Ltd (NNDC) has been under <i>care and maintenance</i> since 2018 (see NNDC, 2018; 2019; 2020a; 2020b; 2021a; 2021b; 2022a; 2022b; 2023 and Trustco Group Holdings Ltd (TGH), 2021).</p> <p>Note that the Management Plan for the Skeleton Coast National Park (SCNP) has been updated (period 2021/2022-2030/2031) (see Ministry of Environment, Forestry and Tourism (MEFT), 2021).</p> <p>The staff amount to seven people; six people employed by NNDC and one person (security) employed by TGH. Daily meetings are held during which environmental matters, amongst others, are discussed (Mr Johan van Rooyen, Head Mining Operations and Development, Northern Namibia Development Company (Pty) Ltd, pers. comm.).</p>
Consultation and Disclosure	Social and Environmental Performance	<p>Maintain open and direct lines of communication with the Authorities and Interested and Affected Parties (I&amp;APs) (e.g. the Ministry of Environment, Forestry and Tourism (MEFT), the Ministry of Mines and Energy (MME), the Ministry of Agriculture, Water and Forestry Land Reform (MAWLR), the Ministry of Fisheries and Marine Resources (MFMR), the Municipalities of Swakopmund and Walvis Bay, the Otjipupa Investment Group Pty (Ltd), etc.) with regards to environmental matters.</p> <p>Consult with I&amp;APs throughout the project process and adequately incorporate I&amp;APs' concerns.</p>	<p>Ongoing.</p> <p>NNDC received an <i>Application and Approval Procedure for Entering Parks</i> from Mr J. Kazeurua, Chief Warden, SCNP on 08 February 2019 (see NNDC, 2019).</p> <p>Representatives from NNDC attended the Northern SCNP Stakeholder Meeting held on 12 June 2019 (see NNDC, 2019).</p> <p>The SCIONA Transboundary Workgroup visited the Kunene Mouth area in January 2020 and stayed at the NNDC Camp Site.</p> <p>Members of the Skeleton Coast Brown Hyena Project visited the Kunene Mouth area in June 2020 and also stayed at the NNDC Camp Site.</p> <p>A MEFT Consulting Working Group met with NNDC Management (at the Camp Site) re the Park Management Plan in early June 2020.</p>

Aspect	Potential Impact	Mitigation	Compliance & Comments (September 2023)
			<p>At the end of June 2020, Hon Governor Marius Sheya and a Management Team visited the Kunene Mouth area and was accommodated at the NNDC Camp Site (see NNDC, 2020b).</p> <p>Staff from the Namibia Electoral Commission also visited the NNDC mine (via helicopter) to create awareness re the elections and to assist personnel with voter registration (see NNDC, 2021a).</p> <p>Staff from NNDC (as a key stakeholder within the SCNP) attended a meeting via Zoom on 05 March 2021; several management issues were discussed.</p> <p>Staff from NNDC also attended a SCNP Stakeholder Meeting at Möwe Bay on 25 March 2021.</p> <p>Staff from MEFT visited the area between 24 and 27 April 2021 and stayed at the NNDC Camp Site. The scientists counted and monitored the crocodiles along the Kunene River between Epupa Falls and the Kunene River mouth; the team also placed nets in the River to collect and determine whether the freshwater fish species have any illnesses or parasites. The helicopter used, made use of the Kunene River Mouth Landing Strip (see NNDC, 2021b).</p> <p>Between 24 and 26 October 2021, Hon Governor Marius Sheya, and representatives from line Ministries and some Hon Mayors from the Kunene Region visited the Region. NNDC's assistance was required to escort the convoy of vehicles from Angra Fria to the ML-area (NNDC, 2022a).</p>
Corporate Social Responsibility (CSR)	Social and Environmental Performance		<p>During the Northern SCNP Stakeholder Meeting held on 12 June 2019, NNDC undertook the responsibility to conduct an estimation of repair and renovations of the museum building at Möwe Bay (see NNDC, 2019). The latter was not needed as the building at Möwe Bay was rebuilt (similar to the Ugab Gate and Springbokwasser) (Mr Johan van Rooyen, Head Mining Operations and Development, Northern Namibia Development Company (Pty) Ltd, pers. comm.).</p> <p>NNDC participated (and assisted with sponsorship) in the International Coastal Clean-Up Day Campaigns between 08 and 10 September 2018 (see NNDC, 2018), and 21-23 September 2019 (see NNDC, 2020a).</p>




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			NNDC was the main sponsor for the Annual Terrace Bay Clean-up Campaign held between 24 and 27 November 2021 (NNDC, 2022a).
Contribution to Scientific Knowledge	Social and Environmental Performance		<p>Following the <i>Environmental Scoping, Impact Assessment and Management Plan for the Conversion of Exclusive Prospecting License (EPL) 2633 to Mining License (ML) 156 for the Mining of Precious Stones by Northern Namibia Development Company (Pty) Ltd, Kunene Region, Namibia</i> (see Maartens, 2018), Cunningham <i>et al.</i> (2018; 2019) published two articles, one in the Namibian Journal of Environment (re reptiles in the area) and one in Lanioturdus (re the birds in the general area).</p> <p>In 2020, a third paper was published (also) in the Namibian Journal of Environment re green turtles (see Cunningham and Van Rooyen, 2020). In 2023, an article re green sea turtles was published in Conservation Namibia (see Korukuve, 2023).</p>
Grievance Mechanism	Social and Environmental Performance	<p>Implement a grievance mechanism for receiving and resolving any concerns and grievances related to the project's social and environmental performance throughout the project life cycle.</p> <p>Inform all I&amp;APs about the mechanism.</p> <p>Address concerns promptly and transparently and in a culturally appropriate manner.</p> <p>Keep a register of all concerns/issues received from I&amp;APs, as well as the measures taken to address these.</p>	<p>NNDC Management has an "open door policy" when it comes to staff concerns and/or grievances.</p> <p>NNDC is a member of the SCNP Stakeholders Forum where all SCNP-related issues are discussed / addressed (Mr Johan van Rooyen, Head Mining Operations and Development, Northern Namibia Development Company (Pty) Ltd, pers. comm.).</p>
Training, including awareness and inductions	Social and Environmental Performance	<p>Train employees and contractors in matters related to the project's social and environmental performance and Namibia's regulatory requirements.</p> <p>Ensure adequate environmental awareness training for all senior site personnel.</p> <p>Give environmental induction presentations to all site personnel, as well as visitors (e.g. consultants and service providers).</p>	<p>NNDC has been under <i>care and maintenance</i> since 2018 (see NNDC, 2018; 2019; 2020a; 2020b; 2021a; 2021b; 2022a; 2022b; 2023 and TGH, 2021).</p> <p>No training has taken place; the staff amount to seven people; six people employed by NNDC and one person (security) employed by TGH.</p> <p>All visitors receive environmental induction presentations (Mr Johan van Rooyen, Head Mining Operations and Development, Northern Namibia Development Company (Pty) Ltd, pers. comm.).</p>
Employment and procurement opportunities	Social and Environmental Performance	<p>Include the EMP in the contract(s) with the contractors/service providers so that the latter can make provision for the implementation of the EMP.</p>	<p>NNDC has been under <i>care and maintenance</i> since 2018 (see NNDC, 2018; 2019; 2020a; 2020b; 2021a; 2021b; 2022a; 2022b; 2023 and TGH, 2021).</p>

Aspect	Potential Impact	Mitigation	Compliance & Comments (September 2023)
		<p>Penalties for non-compliance with the stipulations of the EMP should be agreed upon (and can be included in the contract documents).</p> <p>Source contracting companies/service providers/experts/workers based on merit and expertise giving preference to local contractors/service providers/experts/workers on condition that the local contractors/service providers/experts/workers have the required experience and expertise.</p> <p>Tender policy to give preference to small and medium service provider companies from the Kunene Region, and then Namibia in order to ensure maximum local beneficiation.</p> <p>Consider utilising local labour for unskilled work and to then provide training to workers in order to perform semi-skilled work; this should be done under the supervision of managers/specialists to ensure maximum local beneficiation.</p> <p>Investigate the possibility of employing people trained by the Namibian Institute for Mining and Technology (NIMT) in Arandis.</p> <p>Ensure that proposals received (from contractor(s)/service providers) are scrutinised to ensure that minimum wages have been adhered to in the costing.</p> <p>Ensure that contractors/service providers/experts adhere to the Namibian Labour, Social Security, Health and Safety, and Affirmative Action laws.</p> <p>Tender documents to stipulate that all contractors/service providers have an <b>HIV/AIDS Policy and Programme</b> in place.</p> <p>Source maximally from local resources to ensure maximum economic beneficiation of local businesses in terms of new business sales.</p>	<p>The only contractor that visited the area (twice) since 2018, has been Oshitenda Business Group CC who bought Articulated Dump Trucks (ADTs), the latter that was taken out of the SCNP (Mr Johan van Rooyen, Head Mining Operations and Development, Northern Namibia Development Company (Pty) Ltd, pers. comm.).</p>
Labour and Working Conditions	Social and Environmental Performance	<p>Establish, maintain and improve the worker-management relationship. Base the employment relationship on equal opportunity and fair treatment and no discrimination to be allowed.</p> <p>Comply with Namibia's labour and employment laws.</p>	<p>Ongoing; NNDC has been under <i>care and maintenance</i> since 2018 (see NNDC, 2018; 2019; 2020a; 2020b; 2021a; 2021b; 2022a; 2022b; 2023 and TGH, 2021).</p> <p>NNDC Management has an "open door policy" when it comes to staff concerns and/or grievances (Mr Johan van</p>

Aspect	Potential Impact	Mitigation	Compliance & Comments (September 2023)
		<p>Promote safe and healthy working conditions and the protection and promotion of worker health.</p> <p>Document and communicate the Working Conditions and Terms of Employment.</p> <p>Respect Collective Agreements and the right of workers to organize and bargain collectively.</p> <p>Implement a Grievance Mechanism.</p>	<p>Rooyen, Head Mining Operations and Development, Northern Namibia Development Company (Pty) Ltd, pers. comm.).</p>
Occupational Health, Safety and Security	Social and Environmental Performance	<p>Adhere to all Namibia's Health and Safety Regulations (Labour Act, 1992: Regulations Relating to the Health and Safety of Employees at Work).</p> <p>Ensure that an <b>HIV/AIDS Policy and Programme and Health and Safety Procedure/Plan</b> are in place. <i>Trustco Group Holdings Ltd (TGH) has an HIV/Aids Policy (2012), as well as an Occupational Health and Safety Procedure (2017) in place.</i></p> <p>Occupational Health and Safety Training to be provided to all employees.</p> <p>Ensure that qualified first aid can be provided at all times.</p> <p>Comply with all safety regulations re. electricity supply.</p> <p>Ensure that employees are trained in the use of appropriate fire fighting equipment and ensure that such equipment is on hand at all times.</p> <p>Provide and ensure the active use of Personal Protective Equipment (PPE) (e.g. protective glasses and dust masks in dusty working conditions, overalls, gloves, safety shoes and hard hats).</p> <p>Make suitable arrangements, as far as practicable, for the maintenance of health, the prevention and overcoming of outbreaks of disease and of adequate first aid services.</p> <p>Prevent communicable disease (e.g. Sexually Transmitted Infections (STIs) such as HIV transmission): provide surveillance and active screening and treatment of employees; prevent illness among employees (through health awareness and education initiatives); ensure ready access to medical</p>	<p>Ongoing; NNDC has been under <i>care and maintenance</i> since 2018 (see NNDC, 2018; 2019; 2020a; 2020b; 2021a; 2021b; 2022a; 2022b; 2023 and TGH, 2021).</p>

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		<p>treatment, confidentiality and appropriate care, particularly with respect to migrant workers; and promote immunization.</p> <p>Supply potable water for human consumption and other domestic uses; conduct chemical testing of water samples.; <del>drinking water quality to be in accordance with the MAWF's Water Quality Guidelines and Standards for Potable Water (2008; see Annexure H)*.</del></p> <p>Ensure that security arrangements are in place.</p> <p>Transport safety: all vehicles/trucks moving on the (internal) roads/tracks should not exceed (between 10 kilometres per hour (km/h) and) 40 km/h (as per NNDC's <i>Transport Management Plan and Procedure, 2017</i>); vehicles/trucks moving between EPL 2633/ML 156 and the Ugab Gate should not exceed 80 km/h; vehicles/trucks moving between the Ugab Gate and Swakopmund should not exceed 100 km/h; vehicles/trucks travelling elsewhere to adhere to the speed limits of Namibia.</p>	<p>Note that the Water Resources Management Act 11 of 2013 was implemented on 29 August 2023. Water Resources Management Regulations (2023) were made under section 129(1) of the Water Resources Management Act No. 11 of 2013 and, where applicable under section 35 of that Act, with the concurrence of the Minister of Health and Social Services (MOHSS).</p> <p>Security arrangement are in place.</p>
Community Safety and Security	Social and Environmental Performance	<p>Regularly inspect (and replace if/when required) the signs informing the Public of the existence of the <del>Exclusive Prospecting</del> Mining Licence (EPL/ML)-area (including contact details), as well as that the area is a Restricted Area (as per Section 52 of the Diamond Act 13 of 1999).</p> <p>Transport safety: all vehicles/trucks moving on the (internal) roads/tracks should not exceed (between 10 km/h and) 40 km/h (as per NNDC's <i>Transport Management Plan and Procedure, 2017</i>); vehicles/trucks moving between EPL 2633/ML 156 and the Ugab Gate should not exceed 80 km/h; vehicles/trucks moving between the Ugab Gate and Swakopmund should not exceed 100 km/h; vehicles/trucks travelling elsewhere to adhere to the speed limits of Namibia.</p>	<p>Signboards were erected (NNDC, 2019) and again in 2022 (Mr Johan van Rooyen, Head Mining Operations and Development, Northern Namibia Development Company (Pty) Ltd, pers. comm.).</p> <p>NNDC (2021a) reported on recovering a vehicle that was involved in an accident close to the mine area; NNDC also arranged an air ambulance for the evacuation of the injured person to Windhoek.</p>

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 <p>Figure 2: Pictures showing “no entry” and “restricted area” signs; signs were put up at the entrances/along (south, east, and west) the Mining License-area (Source: Mr J. van Rooyen, Northern Namibia Development Company (Pty) Ltd).</p>			
Flooding of the Kunene River	Occupational Health and Safety	<p>Obtain the Daily Flood Bulletin from the Namibia Hydrological Services, <del>MAWF</del> MAWLR.</p> <p>Prepare an Emergency Preparedness and Response Plan / Disaster Management and Evacuation Plan.</p>	<p>In February/March 2020, NNDC had to move the water pump system to higher ground due to the flooding of the Kunene River (see NNDC, 2020b).</p> <p>No formal plan is in place (due to the low staff numbers); there is a breakwater, as well as emergency assembly points (Mr Johan van Rooyen, Head Mining Operations and Development, Northern Namibia Development Company (Pty) Ltd, pers. comm.).</p>
<b>Exploration and Mining for Precious Stones and Related Activities</b>			
Exploration/Mining	Disturbance and/or destruction of surface and/or subsurface archaeological material	<p>All staff to be made aware of the provisions of the National Heritage Act 27 of 2004 with regard to the protection of all archaeological sites and the need to report any new finds.</p> <p>Implement the <b>NNDC Chance Finds Procedure (2017)</b>; based on Dr Kinahan’s Chance Finds Procedure, see <del>Annexure E</del> Maartens, 2018)): should a possible or suspected site be discovered (e.g. a grave), immediately stop work, cordon the area off and photograph the area/site; immediately inform the project manager/supervisor, and contact <del>Dr Kinahan</del> an archaeologist, the National Heritage Council of Namibia, and the Police in Möwe Bay/Swakopmund.</p> <p>Under no circumstances are archaeological and/or cultural heritage sites to be disturbed or any relics to be removed from such a site.</p>	Ongoing; NNDC has been under <i>care and maintenance</i> since 2018 (see NNDC, 2018; 2019; 2020a; 2020b; 2021a; 2021b; 2022a; 2022b; 2023 and TGH, 2021).

Aspect	Potential Impact	Mitigation	Compliance & Comments (September 2023)
<p>Access roads/tracks, Exploration/mining sites, Infrastructure (Camp Site, Engineering and Logistics Facilities, Diamond Processing and Treatment (Main) Plant, and Kunene River Mouth Landing Strip)</p>	<p>Disturbance of fauna and habitat alteration</p>	<p>Awareness training to be given to all staff and contractors re the protected fauna species (including the avoidance of and the consequences of the illegal collection of these species).</p> <p>Implement a policy of “no kill” with regards to fauna (e.g. setting of snares and fishing nets, and the indiscriminate killing of perceived dangerous species (e.g. snakes, etc.)). No animal may be injured, fed, trapped, hunted or harmed in any way.</p> <p>Do not introduce any domestic pets (e.g. cats and dogs into the area (cats decimate the local fauna and interbreed and transmit diseases to the indigenous African Wild Cat found (and confirmed) in the area; dogs would target the local ungulates (e.g. Oryx and Springbok) and could potentially transmit diseases (e.g. distemper/rabies) to carnivores (e.g. Brown Hyena and Black-backed Jackal), thus negatively affecting the local fauna).</p> <p>Implement a suitable and appropriate refuse removal policy (littering could result in certain animals (e.g. Brown Hyena, Black-backed Jackal, Crows, etc.) becoming accustomed to humans and the associated activity and result in typical problem animal scenarios / human-wildlife conflict).</p> <p>Avoid any form of pollution of the Kunene River.</p> <p>Limit/avoid excessive fishing, including the collection of the prawn <i>Macrobrachium vollenhovenii</i> (for domestic consumption).</p> <p>Apply for an (annual, if feasible) Fishing Permit from the MFMR.</p> <p>Remove (e.g. capture) unique and sensitive fauna (e.g. <i>Bitis peringueyi</i>) before commencing with exploration/mining (and/or species serendipitously located during this period) and relocate these to a less sensitive/disturbed site(s) in the immediate area.</p> <p>Restrict all activities to previously demarcated areas (for exploration/mining); all other areas to be avoided (especially the sensitive areas: Kunene River mouth and estuary; vegetated islands and sand banks; riparian vegetation; and vegetated dune hummocks – limited exploration/mining only,</p>	<p>Ongoing; NNDC has been under <i>care and maintenance</i> since 2018 (see NNDC, 2018; 2019; 2020a; 2020b; 2021a; 2021b; 2022a; 2022b; 2023 and TGH), 2021.</p> <p>All visitors receive environmental induction presentations (Mr Johan van Rooyen, Head Mining Operations and Development, Northern Namibia Development Company (Pty) Ltd, pers. comm.).</p> <p>NNDC to apply for a Fishing Permit from the MFMR so that staff can do some recreational fishing on Sundays (currently NNDC staff is not allowed to fish, whereas all tourists visiting the Kunene Mouth-area may engage in recreational fishing).</p>



Aspect	Potential Impact	Mitigation	Compliance & Comments (September 2023)
		<p>i.e. do not destroy the entire area) in order to minimize the impact on the surrounding land.</p> <p>Avoid development and the putting up of associated infrastructure in the sensitive areas (Kunene River mouth and estuary, vegetated islands and sand banks, riparian vegetation, and vegetated dune hummocks – limited exploration/mining only, i.e. do not destroy the entire area) (this would minimise the negative effect on the local environment, especially unique features serving as habitat to various vertebrate fauna species).</p> <p>Rehabilitation of disturbed areas to take place on a continuous basis.</p> <p>Consider the idea of employing an Environmental Officer on site to ensure compliance and to minimise the overall impact on the fauna and the environment.</p>	<p>No new infrastructure has been put up since 2018 (Mr Johan van Rooyen, Head Mining Operations and Development, Northern Namibia Development Company (Pty) Ltd, pers. comm.).</p> <p>A map of the rehabilitated mining blocks at ML156 was provided (see Annexure B: Letter from NNDC to the Environmental Commissioner, MEFT, dated 22 June 2022). All pits have been closed; the run of mine stockpiles will be rehabilitated (if it cannot be put through the plant) (Mr Johan van Rooyen, Head Mining Operations and Development, Northern Namibia Development Company (Pty) Ltd, pers. comm.).</p>
Exploration (Reverse Circulation (RC) drilling, including rigs, vehicles, generators)	Pollution of biophysical environment	<p>Use biodegradable and non-toxic drill fluids/additives.</p> <p>All diesel generators on site to be placed on a tarpaulin sail.</p> <p>Oil traps to be installed in appropriate places to collect potential toxic materials.</p> <p>Immediately report and clean up any accidental hydrocarbon spill: Sunisorb, Drizit, Peatsorb can be used to clean up small spills; in case of larger spills, the spill together with the polluted soil should be removed and disposed of at e.g. a biological remediation site.</p> <p>Ensure the availability of absorbent pads and/or spill kits and ensure that personnel are trained in their use.</p> <p>(Backfill or) seal all drill holes with a steel or uPVC casing equipped with a secure cap.</p> <p>Drill cuttings not to be used for backfilling; use clean sand or clay where possible.</p> <p>Drill holes not to be used as pit latrines and/or for the disposal of waste.</p>	Not (Currently) Applicable; no exploration has taken place since 2018; the drill rig has been sold (Mr Johan van Rooyen, Head Mining Operations and Development, Northern Namibia Development Company (Pty) Ltd, pers. comm.).
Access road/tracks	Disturbance of fauna and habitat alteration	Ensure that all staff make use of the existing roads/tracks and that a formal access plan be established and implemented before a new exploration (or mining area) is entered (this	Ongoing; NNDC has been under <i>care and maintenance</i> since 2018 (see NNDC, 2018; 2019; 2020a; 2020b; 2021a; 2021b; 2022a; 2022b; 2023 and TGH, 2021).

Aspect	Potential Impact	Mitigation	Compliance & Comments (September 2023)
		<p>would minimise the effect on localised potentially sensitive habitats in the area). <i>NNDC prepared (and implemented) an Access Control Procedure in 2016.</i></p> <p>Avoid the placing of access routes (roads/tracks) through sensitive areas (e.g. vegetated dune hummocks) (this would minimise the effect on localised potentially sensitive habitats in the area).</p> <p>Implement and maintain (internal) track discipline with maximum speed limits (e.g. (between 10 km/h and) 40 km/h <i>(as per NNDC's Transport Management Plan and Procedure, 2017)</i>) (this would result in fewer faunal road mortalities and associated dust pollution problems).</p> <p>Avoid off-road and unnecessary nocturnal driving in the area (as it could result in the destruction of slow moving fauna, i.e. various reptiles and other nocturnal species).</p>	
Kunene River Mouth Landing Strip	Disturbance of avifauna	<p>Adhere to the “no-flying” restriction below 1,000 m over the entire Skeleton Coast National Park (SCNP) (except at the designated corridors for approved landing strips).</p> <p>Aircraft landings (and take-offs, should northerly winds prevail) to follow a north-easterly rather than a north-westerly approach to avoid the most important habitats, i.e. the Kunene River mouth and estuary (with various sand banks and vegetated islands and high concentrations of unique birds).</p> <p>No low-level scenic flights should be allowed over the sensitive mouth and estuary areas, and including the coastal areas.</p> <p>Carefully consider and weigh up all the options before the existing landing strip is moved.</p>	<p>Not (Currently) Applicable; no NNDC/TGH planes have landed and/or taken off from the Kunene River Mouth Landing Strip since 2018.</p> <p>Skeleton Coast Adventure Tours have used the Landing Strip (to transport tourists); the Strip has also been used for emergency/casualty evacuations (Mr Johan van Rooyen, Head Mining Operations and Development, Northern Namibia Development Company (Pty) Ltd, pers. comm.).</p>
Access road/tracks, Exploration/mining sites, Infrastructure (Camp Site, Engineering and Logistics Facilities, Diamond Processing and Treatment (Main) Plant, and Kunene River Mouth Landing Strip)	Disturbance of flora and habitat alteration	<p>Do not introduce any non-indigenous/invasive alien/exotic plant species to the area.</p> <p>Restrict all activities to previously demarcated areas (for exploration/mining); all other areas to be avoided (especially the sensitive areas: Kunene River mouth and estuary; vegetated islands and sand banks; riparian vegetation; and vegetated dune hummocks – limited exploration/mining only, i.e. do not destroy the entire area) in order to minimize the impact on the surrounding land.</p>	Ongoing; NNDC has been under <i>care and maintenance</i> since 2018 (see NNDC, 2018; 2019; 2020a; 2020b; 2021a; 2021b; 2022a; 2022b; 2023 and TGH, 2021).

Aspect	Potential Impact	Mitigation	Compliance & Comments (September 2023)
		<p>Avoid development and the putting up of associated infrastructure in the sensitive areas (Kunene River mouth and estuary, vegetated islands and sand banks, riparian vegetation, and vegetated dune hummocks – limited exploration/mining only, i.e. do not destroy the entire area) (this would minimise the negative effect on the local environment, especially unique features serving as habitat to various vertebrate fauna species).</p> <p>Rehabilitation of disturbed areas to take place on a continuous basis.</p>	<p>No new infrastructure has been put up since 2018 (Mr Johan van Rooyen, Head Mining Operations and Development, Northern Namibia Development Company (Pty) Ltd, pers. comm.).</p> <p>A map of the rehabilitated mining blocks at ML156 was provided (see Annexure B: Letter from NNDC to the Environmental Commissioner, MEFT, dated 22 June 2022). All pits have been closed; the run of mine stockpiles will be rehabilitated (if it cannot be put through the plant) (Mr Johan van Rooyen, Head Mining Operations and Development, Northern Namibia Development Company (Pty) Ltd, pers. comm.).</p>
<p>Access road/tracks, Exploration/mining sites, Infrastructure (Camp Site, Engineering and Logistics Facilities, Diamond Processing and Treatment (Main) Plant, and Kunene River Mouth Landing Strip)</p>	<p>Pollution of biophysical environment (air, soil and water)</p>	<p>No fires will be allowed, unless a specific area has been set aside for the cooking of food. Cooking appliances (e.g. gas stoves) are to be properly maintained and ventilated.</p> <p>Sanitary wastewater to be released into a French drain system (Engineering and Logistics Facilities, Diamond Processing and Treatment (Main) Plant, and Kunene River Mouth Landing Strip). Upgrade the current French drain system at the Camp Site. Use bio-degradable detergents on site.</p> <p>Vehicle maintenance/servicing/washing not to be allowed anywhere on site apart from at the Wash Bay (Engineering and Logistics Facilities).</p> <p>Fuel tanks (portable), gas cylinders and chemicals (if relevant) are to be properly stored and transported.</p> <p>All diesel generators on site to be placed on concrete slabs/a tarpaulin sail.</p> <p>Oil and grease traps or sumps to be installed and maintained.</p> <p>Immediately report and clean up any accidental hydrocarbon spill: Sunisorb, Drizit, Peatsorb can be used to clean up small spills; in case of larger spills, the spill together with the polluted soil should be removed and disposed of at e.g. a biological remediation site; ensure the availability of absorbent pads</p>	<p>Ongoing; NNDC has been under <i>care and maintenance</i> since 2018 (see NNDC, 2018; 2019; 2020a; 2020b; 2021a; 2021b; 2022a; 2022b; 2023 and TGH, 2021).</p> <p>Due to the low staff numbers, the current French drain system at the Camp Site has not been upgraded. The MAWLR issued a Wastewater and Effluent Disposal Exemption Permit (number 11 284) on 30 May 2022; the permit expires 31 May 2025.</p>

Aspect	Potential Impact	Mitigation	Compliance & Comments (September 2023)
		<p>and/or spill kits and ensure that personnel are trained in their use.</p> <p>Enforce proper waste (hazardous and non-hazardous) management practices (as per NNDC's <b>Waste Management Plan and Procedure (2017) and Hazardous Materials Management Procedure</b>) – waste and litter to be disposed of in scavenger and weatherproof bins and the refuse to be collected and disposed of once a month (with prior permission from the Swakopmund Municipality). All hazardous waste to be disposed of at a recognized hazardous waste disposal site (e.g. Walvis Bay and with prior permission from the Walvis Bay Municipality).</p>	
Presence of exploration/mining teams, increased traffic, presence and movement of machinery	Noise pollution	<p>Exploration/mining activities to cease at sunset.</p> <p>Implement and maintain (internal) track discipline with maximum speed limits (e.g. (between 10 km/h and) 40 km/h (<i>as per NNDC's Transport Management Plan and Procedure, 2017</i>)).</p>	Ongoing; NNDC has been under <i>care and maintenance</i> since 2018 (see NNDC, 2018; 2019; 2020a; 2020b; 2021a; 2021b; 2022a; 2022b; 2023 and TGH, 2021).
Access road/tracks, Exploration/mining sites, Infrastructure (Camp Site, Engineering and Logistics Facilities, Diamond Processing and Treatment (Main) Plant, and Kunene River Mouth Landing Strip)	Soil erosion	<p><u>Sediment mobilization and transport</u>: reduce or prevent soil erosion (schedule activities to avoid heavy rainfall periods; contour and minimize length and steepness of slopes; mulching to stabilize exposed areas; re-vegetate areas promptly; and design channels and ditches for post-construction flow). Note that the area(s) towards and adjacent to the drainage line(s) are easily eroded and further development may exacerbate this problem.</p> <p><u>Road design</u>: limit access road gradients to reduce run-off induced erosion; provide adequate road drainage based on road width, surface material, compaction and maintenance.</p> <p><u>Structural (slope) stability</u>: provide effective short-term measures for slope stabilization, sediment and subsidence control until long-term measures (during operations) can be implemented; provide adequate drainage systems to minimize and control infiltration.</p>	Ongoing; NNDC has been under <i>care and maintenance</i> since 2018 (see NNDC, 2018; 2019; 2020a; 2020b; 2021a; 2021b; 2022a; 2022b; 2023 and TGH, 2021).
Access road/tracks, Exploration/mining sites, Infrastructure (Camp Site, Engineering and Logistics Facilities, Diamond Processing and Treatment (Main)	Air quality (dust or Particulate Matter (PM) pollution)	<p>Minimize dust generation from vehicles on the roads; all vehicles/trucks moving on the (internal) roads/tracks should not exceed (between 10 km/h and) 40 km/h (<i>as per NNDC's Transport Management Plan and Procedure, 2017</i>); vehicles/trucks moving between <del>EPL 2633/ML 156</del> and the Ugab Gate should not exceed 80 km/h.</p>	Ongoing; NNDC has been under <i>care and maintenance</i> since 2018 (see NNDC, 2018; 2019; 2020a; 2020b; 2021a; 2021b; 2022a; 2022b; 2023 and TGH, 2021).

Aspect	Potential Impact	Mitigation	Compliance & Comments (September 2023)
Plant, and Kunene River Mouth Landing Strip)		<p>Minimize the area in which the movement of vehicles will take place to reduce the effects of dust pollution.</p> <p>Minimize dust from open area sources, including storage piles, by using control measures (install enclosures and covers, and increase the moisture content).</p> <p>Avoid the excavation, handling and transport of erodible materials under high wind conditions or when a visible dust plume is present.</p> <p>Maintain the road/track and landing strip surfaces to preserve surface characteristics (e.g. texture and roughness).</p> <p>Avoid landing strip maintenance under high wind conditions or when a visible dust plume is present.</p> <p>Use dust control/suppression methods (if needed), such as applying water or non-toxic chemicals to minimize dust (oil and oil by-products is not a recommended measure to control road dust).</p>	
Increased traffic, presence and movement of machinery (exhaust from diesel engines)	Air quality & Occupational and Community Health and Safety	Fleet owners/operators to implement manufacturer recommended engine maintenance programmes (to control vehicle emissions: Carbon Monoxide (CO), carbon dioxide (CO <sub>2</sub> ), Nitrogen Oxide (NO <sub>x</sub> ), Sulphur Dioxide (SO <sub>2</sub> ), Particulate Matter (PM) and Volatile Organic Compounds (VOCs)).	Ongoing; NNDC has been under <i>care and maintenance</i> since 2018 (see NNDC, 2018; 2019; 2020a; 2020b; 2021a; 2021b; 2022a; 2022b; 2023 and TGH, 2021).
Increased traffic, presence and movement of machinery	Occupational and Community Safety	<p>Adopt best transport safety practices by implementing the following measures: emphasize safety aspects among drivers; improve driving skills and require licensing of drivers; adopt limits for trip duration; avoid dangerous routes and times of day; and use speed control devices.</p> <p>Regularly maintain vehicles and use manufacturer approved parts.</p> <p>Use locally sourced materials (where possible) to minimize transport distances.</p> <p>Employ safe traffic control measures, including the use of traffic and safety warning signs and flag persons to warn of dangerous conditions.</p>	Ongoing; NNDC has been under <i>care and maintenance</i> since 2018 (see NNDC, 2018; 2019; 2020a; 2020b; 2021a; 2021b; 2022a; 2022b; 2023 and TGH, 2021).
Kunene River Mouth Landing Strip	Occupational and Community Safety	Maintain the landing strip surface twice annually to preserve surface characteristics (e.g. texture and roughness).	MEFT noted that the runway/airstrip was poorly regulated and requested (copies of) all the related permits in relation to the operation of the airstrip (see Annexure B: Letter from

Aspect	Potential Impact	Mitigation	Compliance & Comments (September 2023)
		<p>Inspect the wind sock monthly (and repair/replace as needed) (the area is characterized by severe wind and sand storms).</p> <p>Paint the boundary demarcation stones (of the landing strip) white (twice annually).</p> <p>Ensure that the run-up pad is free of rocks/stones before landing and take-off.</p> <p>Apply wildlife repellent techniques (if necessary), e.g. audio techniques, or visual techniques to scare and repel wildlife (e.g. Oryx and Springbok).</p>	<p>the Office of the Environmental Commissioner, MEFT to LM Environmental Consulting, dated 12 May 2022).</p> <p>The landing strip operated by NNDC is regulated and all flights are reported to MME in line with regulations. The landing strip was included in the EIA done for ML 156. The landing strip is extremely important for the following reasons: emergencies; diamond exports; Government (NamPol, NDF and MHSS); and tourism (Skeleton Coast Adventure Tours) (see Annexure B: Letter from NNDC to the Environmental Commissioner, MEFT, dated 22 June 2022).</p> <p>No NNDC/TGH planes have landed and/or taken off from the Kunene River Mouth Landing Strip since 2018. Skeleton Coast Adventure Tours have used the Landing Strip (to transport tourists); the Strip has also been used for emergency/casualty evacuations (Mr Johan van Rooyen, Head Mining Operations and Development, Northern Namibia Development Company (Pty) Ltd, pers. comm.).</p>
Final Recovery (X-Ray generator units)	Occupational Health and Safety	Implement and observe the <b>Radiation Management Plan</b> .	<p>Ongoing; NNDC has been under <i>care and maintenance</i> since 2018 (see NNDC, 2018; 2019; 2020a; 2020b; 2021a; 2021b; 2022a; 2022b; 2023 and TGH, 2021).</p> <p>An annual report was submitted to the National Radiation Protection Authority (NRPA) (requirement of NNDC's Radiation Licence Number 325/01/20) (see NNDC, 2022a).</p> <p>The licence for the possession and use of X-ray generating equipment at ML156, Kunene Region, Namibia was renewed on 18 September 2023 (expiry 18 September 2026).</p>
<b>Exploration and Mining for Precious Stones and Related Activities: Change in Land Use</b>			
Access road/tracks, Exploration/mining sites, Infrastructure (Camp Site, Engineering and Logistics Facilities, Diamond Processing and Treatment (Main) Plant, and Kunene River Mouth Landing Strip)	Change in land use	<p>Restrict all activities to previously demarcated areas (for exploration/mining); all other areas to be avoided (especially the sensitive areas: Kunene River mouth and estuary; vegetated islands and sand banks; riparian vegetation; and vegetated dune hummocks – limited exploration/mining only, i.e. do not destroy the entire area) in order to minimize the impact on the surrounding land.</p> <p>Avoid development and the putting up of associated infrastructure in the sensitive areas (Kunene River mouth and estuary, vegetated islands and sand banks, riparian</p>	<p>Ongoing; NNDC has been under <i>care and maintenance</i> since 2018 (see NNDC, 2018; 2019; 2020a; 2020b; 2021a; 2021b; 2022a; 2022b; 2023 and TGH, 2021).</p> <p>No new infrastructure has been put up since 2018 (Mr Johan van Rooyen, Head Mining Operations and</p>



Aspect	Potential Impact	Mitigation	Compliance & Comments (September 2023)
		vegetation, and vegetated dune hummocks – limited exploration/mining only, i.e. do not destroy the entire area) (this would minimise the negative effect on the local environment, especially unique features serving as habitat to various vertebrate fauna species).	Development, Northern Namibia Development Company (Pty) Ltd, pers. comm.).
<b>Exploration and Mining for Precious Stones and Related Activities: Resource Use</b>			
Energy Management	Resource use (e.g. coal) / depletion of natural resources	Promote the sustainable use of energy (that will result in the reduction of use and cost reductions) (e.g. energy efficient light sources). <i>Energy to the Camp Site comes from solar panels; solar geysers are used to heat the water for the showers.</i>  Raise awareness amongst the staff and contractors/service providers (to save energy).	Ongoing; NNDC has been under <i>care and maintenance</i> since 2018 (see NNDC, 2018; 2019; 2020a; 2020b; 2021a; 2021b; 2022a; 2022b; 2023 and TGH, 2021).  All visitors receive environmental induction presentations (Mr Johan van Rooyen, Head Mining Operations and Development, Northern Namibia Development Company (Pty) Ltd, pers. comm.).
Water Management	Resource use / depletion of natural resources	Raise awareness amongst the staff to save water / ensure the prudent use of water in all activities.  Implement a water conservation program, promoting the continuous reduction in water consumption; treatment and disposal costs commensurate with the magnitude and cost of water use.  Water storage tanks to be insect and animal-proof and to be covered to reduce evaporation.	Ongoing; NNDC has been under <i>care and maintenance</i> since 2018 (see NNDC, 2018; 2019; 2020a; 2020b; 2021a; 2021b; 2022a; 2022b; 2023 and TGH, 2021).  All visitors receive environmental induction presentations (Mr Johan van Rooyen, Head Mining Operations and Development, Northern Namibia Development Company (Pty) Ltd, pers. comm.).
<b>Exploration and Mining for Precious Stones and Related Activities: Hazardous Materials Management</b>			
Hazardous materials management	Social and Environmental Performance	Establish hazardous materials management priorities (based on hazard analysis of risky operations).  Avoid, or minimize the use of hazardous materials.  Prevent uncontrolled releases of hazardous materials to the environment or uncontrolled reactions that may result in fire or explosion.  Implement management controls (procedures, inspections and training, communication and drills) to address residual risks.	Ongoing; NNDC has been under <i>care and maintenance</i> since 2018 (see NNDC, 2018; 2019; 2020a; 2020b; 2021a; 2021b; 2022a; 2022b; 2023 and TGH, 2021).
Hazardous materials management	Pollution of biophysical environment (soil and water)	Implement prevention and control measures for the use, handling and storage of hazardous materials: <u>Materials transfer</u> : regularly inspect, maintain and repair fittings/pipes/hoses; make use of drip trays/other drip containment measures at connection/possible overflow points; <u>Overfill protection</u> : use trained filling operators; install gauges on tanks to measure the volume inside; make use of dripless hose connections (vehicle tanks) and fixed connections	Ongoing; NNDC has been under <i>care and maintenance</i> since 2018 (see NNDC, 2018; 2019; 2020a; 2020b; 2021a; 2021b; 2022a; 2022b; 2023 and TGH, 2021).

Aspect	Potential Impact	Mitigation	Compliance & Comments (September 2023)
		<p>(storage tanks); use a catch basin/drip tray around the fill pipe to collect spills;</p> <p><u>Reaction, fire, and explosion prevention</u>: hazardous materials to be stored in marked containers and separate (from non-hazardous materials); incompatible hazardous materials (acids, bases, flammables, oxidizers, reactive chemicals) to be stored in separate areas and with containment facilities separating material storage; smoking or working with open flames not to be permitted in the presence of these substances; limit access to hazardous waste storage areas and clearly label and demarcate the area; conduct regular inspections of the areas and document the findings; prepare and implement spill response and emergency plans; train employees in the use of appropriate fire fighting equipment and ensure that such equipment is on hand at all times.</p> <p><u>Secondary containment</u>: use bunding (made of impervious, chemically resistant material) that can contain the larger of 110% of the largest tank or 25% of the combined tank volumes for above-ground tanks with a total storage volume equal or greater than 1,000 litres.</p> <p>Train workers on the correct transfer and handling of fuels and chemicals and the response to spills.</p> <p>Immediately report and clean up any accidental hydrocarbon spill: Sunisorb, Drizit, Peatsorb can be used to clean up small spills; in case of larger spills, the spill together with the polluted soil should be removed and disposed of at e.g. a biological remediation site.</p>	
Hazardous materials management	Occupational Health and Safety	<p>Implement hazard communication and training programmes (including information on Material Safety Data Sheets (MSDS)) to make employees aware of workplace chemical hazards and how to respond to these.</p> <p>Provide and ensure the active use of PPE.</p>	Ongoing; NNDC has been under <i>care and maintenance</i> since 2018 (see NNDC, 2018; 2019; 2020a; 2020b; 2021a; 2021b; 2022a; 2022b; 2023 and TGH, 2021).
<b>Exploration and Mining for Precious Stones and Related Activities: Waste Management</b>			
Waste management: non-hazardous and hazardous	Pollution of biophysical environment	<p>A <b>Waste Management Plan and Procedure</b> is in place. The generation of waste should be avoided or minimized as far as practicable; where it cannot be avoided, but has been minimized, waste should be recovered and reused; where waste cannot be recovered/reused, it should be treated, destroyed and disposed of in an environmentally sound manner.</p>	<p>Ongoing; NNDC has been under <i>care and maintenance</i> since 2018 (see NNDC, 2018; 2019; 2020a; 2020b; 2021a; 2021b; 2022a; 2022b; 2023 and TGH, 2021).</p> <p>Redundent equipment and domestic waste were removed (see NNDC, 2020a).</p>

Aspect	Potential Impact	Mitigation	Compliance & Comments (September 2023)
		<p>Raise awareness amongst the staff/contractors/service providers (to reduce, recycle and reuse waste).</p> <p>Institute and maintain good housekeeping and operating practices; littering is not allowed (littering could result in certain animals (e.g. Brown Hyena, Black-backed Jackal, Crows, etc.) becoming accustomed to humans and the associated activity and result in typical problem animal scenarios / human-wildlife conflict).</p> <p>All diesel generators on site to be placed on concrete slabs/a tarpaulin sail.</p> <p>Runoff from areas where surface water might have become contaminated should be captured and treated in accordance with the MAWF's Water Quality Standards for Effluent (2008; see Annexure H)*; uncontaminated runoff should be diverted around areas where such water might become contaminated.</p> <p>Non-hazardous and hazardous waste to be collected and stored separately. Refuse bins / skips must be scavenger and weatherproof, and must have sufficient capacity to prevent over-storage.</p> <p>Non-hazardous waste: refuse (that will not be recycled) to be stored in covered refuse bins, collected on a regular basis (at least once a month) and disposed of at the Swakopmund Municipal Landfill (with prior permission from the Swakopmund Municipality).</p> <p>Hazardous waste: recycle petroleum (fuels and lubricants) waste products and collect and recycle batteries and print cartridges (if relevant). The remainder to be transported to a recognized hazardous waste disposal site (e.g. Walvis Bay and with prior permission from the Walvis Bay Municipality).</p>	<p>NNDC (2021a) noted that the removal of waste material and scrap (e.g. old oil, tins, scrap metal, and glass bottles) from the mine-area and out of the SCNP was ongoing.</p> <p>Between January and June 2022, NNDC took out 100 litres of old oil (from the SCNP) to WESCO Waste management in Walvis Bay; a Waste Disposal Certificate was obtained. Also, domestic waste (mostly bottles and tin) we taken out (of the SCNP) and disposed of at the Municipal Landfill in Swakopmund (see NNDC, 2022b).</p> <p>When oil is taken out, NNDC does get receipts; household waste are disposed of at the Municipal Landfills in Henties Bay, or Swakopmund (Mr Johan van Rooyen, Head Mining Operations and Development, Northern Namibia Development Company (Pty) Ltd, pers. comm.).</p>
Waste management: sanitary	Pollution of biophysical environment	<p>Sanitary wastewater to be released into a French drain system (Engineering and Logistics Facilities, Diamond Processing and Treatment (Main) Plant, and Kunene River Mouth Landing Strip). Upgrade the current French drain system at the Camp Site. Use bio-degradable detergents on site.</p> <p>Ensure that the discharge of sanitary wastewater to land conform to the regulatory requirements (MAWF's Water Quality Standards for Effluent, 2008; see Annexure H)*.</p>	<p>Ongoing; NNDC has been under <i>care and maintenance</i> since 2018 (see NNDC, 2018; 2019; 2020a; 2020b; 2021a; 2021b; 2022a; 2022b; 2023 and TGH, 2021).</p> <p>Due to the low staff numbers, the current French drain system at the Camp Site has not been upgraded. The MAWLR issued a Wastewater and Effluent Disposal Exemption Permit (number 11 284) on 30 May 2022; the permit expires 31 May 2025.</p>

Aspect	Potential Impact	Mitigation	Compliance & Comments (September 2023)
			Note that the Water Resources Management Act 11 of 2013 was implemented on 29 August 2023. Water Resources Management Regulations (2023) were made under section 129(1) of the Water Resources Management Act No. 11 of 2013 and, where applicable under section 35 of that Act, with the concurrence of the MOHSS.
Waste management – radioactive sources	Occupational and community health and safety	Dispose of inoperative X-Ray generator unit(s) as per the <b>Radiation Management Plan</b> (at a specialised electronic equipment disposal facility, or return the X-Ray generator unit(s) to the manufacturer in South Africa).	Not (Currently) Applicable; NNDC has been under <i>care and maintenance</i> since 2018 (see NNDC, 2018; 2019; 2020a; 2020b; 2021a; 2021b; 2022a; 2022b; 2023 and TGH, 2021).
Wastewater management - wastewater treatment	Pollution of biophysical environment	Ensure that the discharge of process wastewater and/or sanitary wastewater and/or wastewater from utility operations and/or stormwater to land conform to the regulatory requirements <del>(MAWF, 2008; see Annexure H)*</del> .  Runoff from areas where surface water might have become contaminated should be captured and treated in accordance with the regulatory requirements <del>MAWF's Water Quality Standards for Effluent (2008; see Annexure H)*</del> ; uncontaminated runoff should be diverted around areas where such water might become contaminated.	Ongoing; NNDC has been under <i>care and maintenance</i> since 2018 (see NNDC, 2018; 2019; 2020a; 2020b; 2021a; 2021b; 2022a; 2022b; 2023 and TGH, 2021).  Note that the Water Resources Management Act 11 of 2013 was implemented on 29 August 2023. Water Resources Management Regulations (2023) were made under section 129(1) of the Water Resources Management Act No. 11 of 2013 and, where applicable under section 35 of that Act, with the concurrence of the MOHSS.
Wastewater management - stormwater management	Soil erosion	Regular inspection and maintenance of permanent erosion and runoff control features.	Ongoing; NNDC has been under <i>care and maintenance</i> since 2018 (see NNDC, 2018; 2019; 2020a; 2020b; 2021a; 2021b; 2022a; 2022b; 2023 and TGH, 2021).
<b>Exploration and Mining for Precious Stones and Related Activities: Rehabilitation and Closure</b>			
Rehabilitation and Closure	Social and Environmental Performance	Rehabilitation to take place on a continuous basis.  Consult with MEFT re their criteria (for successful rehabilitation) so that NNDC's rehabilitation efforts during the operational phase can be approved and signed off by the MEFT).  Monitor the natural rehabilitation by wind and sand movement in order to demonstrate that natural forces will eventually create a landform and surface that blends in with the natural environment.  Update the estimated closure costs on an annual basis. Aim to improve the confidence in the estimated closure costs by including components currently not provided for (e.g. other elements of social closure), as well as by testing rehabilitation tasks and recording their costs individually.	Ongoing; NNDC has been under <i>care and maintenance</i> since 2018 (see NNDC, 2018; 2019; 2020a; 2020b; 2021a; 2021b; 2022a; 2022b; 2023 and TGH, 2021).  A map of the rehabilitated mining blocks at ML156 was provided (see Annexure B: Letter from NNDC to the Environmental Commissioner, MEFT, dated 22 June 2022). "Some equipment has been removed due to the severe impact of west coast weather on equipment. Rehabilitation is budgeted concurrent with operations as an ongoing process as part of mining operations. Historical mined areas have been rehabilitated and only current mining pits are open. The planned Plant Upgrade Project together with additional new equipment will be executed when conditions are found favourable and mining of these pits will continue when operations resume" (see Annexure B: Letter from NNDC to the Environmental Commissioner, MEFT, dated 22 June 2022).

Aspect	Potential Impact	Mitigation	Compliance & Comments (September 2023)
		<p>Inform employees re the Life of Mine (LOM) (and including progress re the Mine Plan) on an annual basis. Provide ongoing, accredited skills development (so that employees leave with more skills than what they had at the time of employment). Evaluate the need for the development of a social closure plan every three years.</p>	
Rehabilitation and Closure	Unplanned closure (2018)	<p>Manually remove all planted (e.g. herbs, lettuce, spinach) and the invasive alien species (e.g. <i>Nicotiana glauca</i>) that are present at the Camp Site.</p> <p>Remove all infrastructure, equipment, waste, temporary structures, etc. from the area.</p> <p>Remove the Solar PV (photovoltaic) Modules. If it cannot be recycled, the modules to be disposed of at the hazardous waste disposal site in Walvis Bay.</p> <p>X-Ray generator units to be recycled, or to be disposed of at a specialised electronic equipment disposal facility, or to be returned to the manufacturer in South Africa.</p> <p>Adequately drain pipelines and tanks prior to decommissioning (to avoid pollution of the biophysical environment).</p> <p>Clean out the oil traps, seal all petrol, diesel, oil and grease containers and remove these from the site(s) to a recognized hazardous waste facility (in Walvis Bay).</p> <p>Backfill the shallow legacy pits from previous mining (S44) with DMS tailings; rehabilitate the current open pits (P1 and PK01) by dozing overburden dumps nearby into the excavated areas; fill the deeper legacy pits (PK7 and PK11) by dozing nearby dumps into the pits; backfill the PK02 pit with DMS tailings and doze the dumps and old heaps surrounding the pit; doze the tailings dump near the Engineering and Logistics Facilities into the adjacent pit; level the stockpiles, fines dump (de-sanding waste), X-Ray tailings and heaps along the sampling trenches with a dozer, or use the material for rehabilitation; scarify compacted areas disturbed by infrastructure and erase the tracks on the rehabilitated areas; rehabilitate the roads/tracks by levelling the edges and 'middelmanneljies' by dragging Articulated Dump Truck (ADT) tyres over the roads/tracks; scarify the haul road with an excavator.</p>	Not (Currently) Applicable

Aspect	Potential Impact	Mitigation	Compliance & Comments (September 2023)
		<p>Manually rip (using picks or rakes) disturbed areas where compaction has taken place; avoid creating parallel furrows (this will promote erosion).</p> <p>Reshape all disturbed areas to their original contours / manually rip disturbed areas.</p> <p>Ensure that the rehabilitated landscapes show a trend towards a natural-looking landform and surface similar to the pre-mining and pre-exploration landscapes.</p>	
Rehabilitation and Closure	Planned closure (2033)	<p><b>Implement the <i>Salsola</i> sp. restoration project, starting 2019:</b> seed collection (2019-2021); production of seedlings in Windhoek (2019-2024); transport of the seedlings to the proposed ML 156-area and transplanting the seedlings into bags (2019-2025); planting of the plants into the disturbed areas (2020-2028); and monitoring and reporting (2020 -2032). Signs to be put (to notify staff and the public of the ongoing restoration project) in 2020 and to be replaced every two years (due to the harsh environmental conditions in the area). Ensure that monitoring of and reporting on the <i>Salsola</i> sp. restoration project (2020 -2032) be completed before the end of LOM, i.e. 2033.</p> <p>Manually remove all planted (e.g. herbs, lettuce, spinach) and the invasive alien species (e.g. <i>Nicotiana glauca</i>) that are present at the Camp Site.</p> <p>Remove all infrastructure, equipment, waste, temporary structures, etc. from the area.</p> <p>Remove the Solar PV (photovoltaic) Modules. If it cannot be recycled, the modules to be disposed of at the hazardous waste disposal site in Walvis Bay.</p> <p>X-Ray generator units to be recycled, or to be disposed of at a specialised electronic equipment disposal facility, or to be returned to the manufacturer in South Africa.</p> <p>Adequately drain pipelines and tanks prior to decommissioning (to avoid pollution of the biophysical environment).</p> <p>Clean out the oil traps, seal all petrol, diesel, oil and grease containers and remove these from the site(s) to a recognized hazardous waste facility (in Walvis Bay).</p>	<p>NNDC has been under <i>care and maintenance</i> since 2018 (see NNDC, 2018; 2019; 2020a; 2020b; 2021a; 2021b; 2022a; 2022b; 2023 and TGH, 2021).</p> <p>No exploration (or mining) has taken place since 2018 (Mr Johan van Rooyen, Head Mining Operations and Development, Northern Namibia Development Company (Pty) Ltd, pers. comm.).</p> <p>Not (Currently) Applicable</p>



Aspect	Potential Impact	Mitigation	Compliance & Comments (September 2023)
		<p>Include the rehabilitation (backfilling and levelling of the backfilled areas) of the historical and existing pits (except S44) in the mine plan; store dune sand separately from other overburden, and backfill the pits with gravel/conglomerate overburden, tailings, and sand (Proto-Kunene Area); rehabilitate the last mined block; scarify compacted areas disturbed by infrastructure and erase the tracks on the rehabilitated areas; rehabilitate the roads/tracks by levelling the edges and 'middelmanneljies' by dragging ADT tyres over the roads/tracks; scarify the haul road with an excavator.</p> <p>Manually rip (using picks or rakes) disturbed areas where compaction has taken place; avoid creating parallel furrows (this will promote erosion).</p> <p>Reshape all disturbed areas to their original contours / manually rip disturbed areas.</p> <p>Ensure that the rehabilitated landscapes show a trend towards a natural-looking landform and surface similar to the pre-mining and pre-exploration landscapes.</p>	
Decommissioning	Social and Environmental Performance	<p>Consult with the MEFT and MME re the demolition of the Camp Site and Kunene River Mouth Landing Strip; a mutual agreement should be reached by the parties as to the conditions (should MEFT wish to keep and maintain the infrastructure).</p> <p>Request the Ministries of Environment, Forestry and Tourism and Mines and Energy to assess the final rehabilitation effort for approval and signoff.</p>	Not (Currently) Applicable

\*The Department of Water Affairs (DWA), Ministry of Agriculture, Water and Rural Development (MAWRD) prepared Water Quality Guidelines and these were adopted in 1998. In 2008, draft Water Quality Guidelines and Standards for Potable Water, as well as Water Quality Standards for Effluent were prepared (Ministry of Agriculture, Water and Forestry (MAWF)) to become Regulations under the Water Resources Management Act 24 of 2004.

### 2.3 Compliance: Monitoring and Reporting

In order to illustrate NNDC's compliance with the proposed "monitoring and reporting" (see Maartens, 2018), the following colour codes were applied:

	Compliance/Completed
	In Progress/Ongoing
	Non-compliance
	Not (Currently) Applicable
	Changes made to existing EMP
	Unknown
	Not audited

Type	Parameter	Frequency	Compliance (2023)
Abstraction of fresh water from the Kunene River for mining and domestic purposes	As per the Department of Water Affairs (DWA), Ministry of Agriculture, Water and Forestry Land Reform's (MAWFLR) conditions to Permit Number 10,799		The Mining License / Environmental Clearance Certificate-holder will have 18 months (from 29 August 2023) to ensure that all is compliant with the Water Resources Management Act 11 of 2013 and Water Resources Management Regulations 2023
Abstraction of sea water from the Atlantic Ocean for industrial purposes	As per the DWA, MAWFLR's conditions to Permit Number 11,284		
(Potable) drinking-water quality	As per the DWA, MAWF's Potable Water Numeric Requirements (see Annexure H) Water Resources Management Act 11 of 2013 and Water Resources Management Regulations 2023		
Wastewater discharge (and re-use if feasible)	As per the DWA, MAWFLR's Effluent Numeric Requirements (see Annexure H) Wastewater and Effluent Disposal Exemption Permit Number 11,284		
X-Ray Units at Final Recovery	As per the Occupational Radiation Protection Programme, Radiation Management Plan (prepared for the Ministry of Health and Social Services)		
Consumer (Fuel) Installation	As per the Ministry of Mines and Energy's (MME's) conditions to the Consumer Installation Certificate Number CI/2679/2014		
Hazardous materials management	Hydrocarbon spills of more than 200 litres	<i>Ad hoc</i> ; inform the Minister, MME by completing form PP/11 (Petroleum Products Regulations 2000)	
Avifauna	Monitor avifauna (bird) disturbances over the estuary during landing and take-off	<i>Ad hoc</i>	Not (Currently) Applicable (N/A); no Northern Namibia Development Company (Pty) Ltd (NNDC) / Trustco Group Holdings (Pty) Ltd (TGH) planes have landed and/or taken off from the Kunene River Mouth Landing Strip since 2018 (Mr Johan van Rooyen, Head Mining Operations and Development, Northern Namibia Development Company (Pty) Ltd, pers. comm.)

Ungulates	Monitor ungulate (and Ostrich) movements related to the proposed fresh water abstraction pipeline (Kunene River to Diamond Processing and Treatment Plant)	<i>Ad hoc</i>	N/A; the pipeline was never actioned (Mr Johan van Rooyen, Head Mining Operations and Development, Northern Namibia Development Company (Pty) Ltd, pers. comm.)
	Monitor ungulate movements and habitat use related to the exploration/mining areas	<i>Ad hoc</i>	N/A; there is daily ungulate activity; NNDC has been on <i>care and maintenance</i> since 2018 (Mr Johan van Rooyen, Head Mining Operations and Development, Northern Namibia Development Company (Pty) Ltd, pers. comm.)
Sewage pipelines	Maintenance and monitor for damage to or leakages	Regular maintenance and weekly monitoring	
Climate data	Temperature and humidity; wind chill, direction and speed; rainfall; and barometric pressure	Monthly	A weather station was put up, but the strong winds destroyed the station within a month (Mr Johan van Rooyen, Head Mining Operations and Development, Northern Namibia Development Company (Pty) Ltd, pers. comm.)
Stormwater and soil erosion (if applicable)	Soil erosion rates	<i>Ad hoc</i> (rainy season)	
Environmental Management Plan	Environmental performance / corrective measures to be taken as or when required	Internal audits (monthly) External audits (six monthly or annually)	Bi-annual reports were submitted to the MEFT (see NNDC, 2018; 2019; 2020a; 2020b; 2021a; 2021b; 2022a; 2022b; 2023 and TGH, 2021).
			External audits have not been carried out due to lack of exploration/mining activity since 2018

~~\*The Department of Water Affairs (DWA), Ministry of Agriculture, Water and Rural Development (MAWRD) prepared Water Quality Guidelines and these were adopted in 1998. In 2008, draft (Water Quality Guidelines and Standards for Potable Water, as well as) Water Quality Standards for Effluent were prepared (Ministry of Agriculture, Water and Forestry (MAWF)) to become Regulations under the Water Resources Management Act 24 of 2004.~~

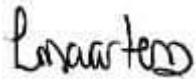
### 3 Conclusions and Recommendations

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Northern Namibia Development Company (Pty) Ltd has been under *care and maintenance* since 2018.

Until a decision is made re the future of exploration/mining activities at the Mining License 156-area, it is advised that:

1. Northern Namibia Development Company (Pty) Ltd implement and observe the Environmental Management Plan on an ongoing basis. Environmental performance should be regularly monitored (so that the lessons learnt can be incorporated into the improvement of the Environmental Management Plan over time) and corrective measures taken as or when required;
2. Rehabilitation of the worked-out areas takes place on a continuous basis within the Mining License 156-area; and
3. Provision is made for adequate financial and human resources to implement the Environmental Management Plan, including the Rehabilitation and Closure Plan, and that adequate funds are available to meet the closure commitments.



Dr Lima Maartens  
LM Environmental Consulting

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## **Annexure A**

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10 June 2021

Ministry of Environment, Forestry and Tourism  
Private Bag 13306  
Windhoek  
Namibia

Attention:  
Mr T Nghitila  
Environmental Commissioner

Dear Sir

RE: Renewal of Environmental Clearance Certificate for Northern Namibia Development Company (Pty) Ltd

Northern Namibia Development Company (Pty) Ltd holds the mineral rights for precious stones under Mining Licence 156. The licence, 3405 hectares in size, is located about 700 kilometers north of Swakopmund, in the north-western corner of Namibia's Skeleton Coast Park; it is bordered by the Atlantic Ocean to the west, and the Kunene River to the north.

This letter is prepared in aid of an application for the renewal of the ECC that expires on 11<sup>th</sup> July 2021 and accommodates an ECC application (Annexure 1) and a Performance Report (Annexure 2), that all specifically deal with the implementation and compliance of the Environmental Management Plan (EMP) for ML 156, Kunene Region, Namibia.

NNDC Mine operations are currently in a state of care and maintenance but will return to operational mode as soon as the current global economic downturn returns to normal. NNDC's management is committed to the Environmental Programmes as discussed in the supporting documents and will continue with mitigation measures to minimise potential impacts during the planned life of the mine. All legal requirements and other relevant standards and best practices are applied to provide effective management of environmental risks.

Based on the accounts of the three-year compliance and performance report, it is kindly requested that the ECC for the NNDC mine operations be renewed for the operational phase to continue as soon as possible.

Sincerely



Johan van Rooyen  
Head: Mining Operations and Development

**NORTHERN NAMIBIA DEVELOPMENT COMPANY (PTY) LTD**  
Registration Number: 90/439

Trustco House, 2 Keller Street | P.O. Box 11363, Windhoek, Namibia | Tel: +264 61 275 4508 | Fax: +264 61275 4090

Directors: F Abrahams, J Joubert, Q van Rooyen, QZ van Rooyen

Form 1

REPUBLIC OF NAMIBIA

ENVIRONMENTAL MANAGEMENT ACT, 2007

(Section 32)

APPLICATION FOR ENVIRONMENTAL CLEARANCE CERTIFICATE



**PART A: DETAILS OF APPLICANT**

1. Name: (person or business):	Northern Namibia Development Company (Pty) Ltd
2. Business Registration / Identity No:	90/439
3. Correspondence Address:	P.O. Box 11363, Windhoek, Namibia
4. Name of Contact Person:	Mr. Johan van Rooyen
5. Position of Contact Person:	Head of Mining Operations and Development
6. Telephone No.:	+264 65 685 013
7. Fax No.:	N/A
8. E-mail Address:	<a href="mailto:johanvr@tgh.na">johanvr@tgh.na</a>

## PART B: SCOPE OF THE ENVIRONMENTAL CLEARANCE CERTIFICATE

### 1. The environmental clearance certificate is for:

Environmental Clearance for the Environmental Management Plan for the Mining of precious stones by Northern Namibia Development Company (Pty) Ltd in Mining License (ML) 156, Kunene Region, Namibia.

**Note that** Risk-Based Solutions cc prepared an Environmental Impact Assessment (EIA) and an Environmental Management Plan (EMP) report for application for a Mining Licence which was submitted in support of an Environmental Clearance Certificate (ECC) application. This application was approved and the ECC for Mining Licence 156 was issued, dated 11<sup>th</sup> July 2018 valid for 3 years. The initial ECC, at the time EPL 2633, was issued on 11 August 2008 and further renewed on 31 January 2013 and again on 15 April 2016.

### 2. Details of the activity(s) covered by the environmental clearance certificate:

#### Title of Activity:

Environmental Clearance Certificate in support of the Environmental Management Plan for the mining activities of precious stones by Northern Namibia Development Company (Pty) Ltd in Mining License (ML) 156, Kunene Region, Namibia.

#### Nature of Activity:

1. Production Activities: Mining, loading and hauling, treatment of ore, waste rock management and engineering maintenance.
2. Logistical Activities: Handling and disposal of waste (including temporary storage), water management (water abstraction from the Kunene River and Atlantic Ocean), sewerage management, hazardous substance management (handling & storage), electricity generation (generators and solar) and accommodation facility management.

#### Location of Activity:

ML 156, Kunene Region, Namibia (*Figure 1*).

#### Scale and Scope of Activity:

Mining precious stones at ML 156, Kunene Region, Namibia. Operations are currently under care and maintenance but production is planned and will consist of free mining of alluvial gravels treated through a screening and DMS plant and recovering precious stones using X-ray and hand sorting facilities. Total planned material (sand and gravel) to be mined per annum is 780,000 tonnes consisting of 180,000 tonnes stripping, 300,000 tonnes waste and 300,000 tonnes ore.

**PART C: DECLARATION BY APPLICANT**

I hereby certify that the particulars given above are correct and true to the best of my knowledge and belief. I understand the environmental clearance certificate may be suspended, amended or cancelled if any information given above is false, misleading, wrong or incomplete.



Mr Johan van Rooyen

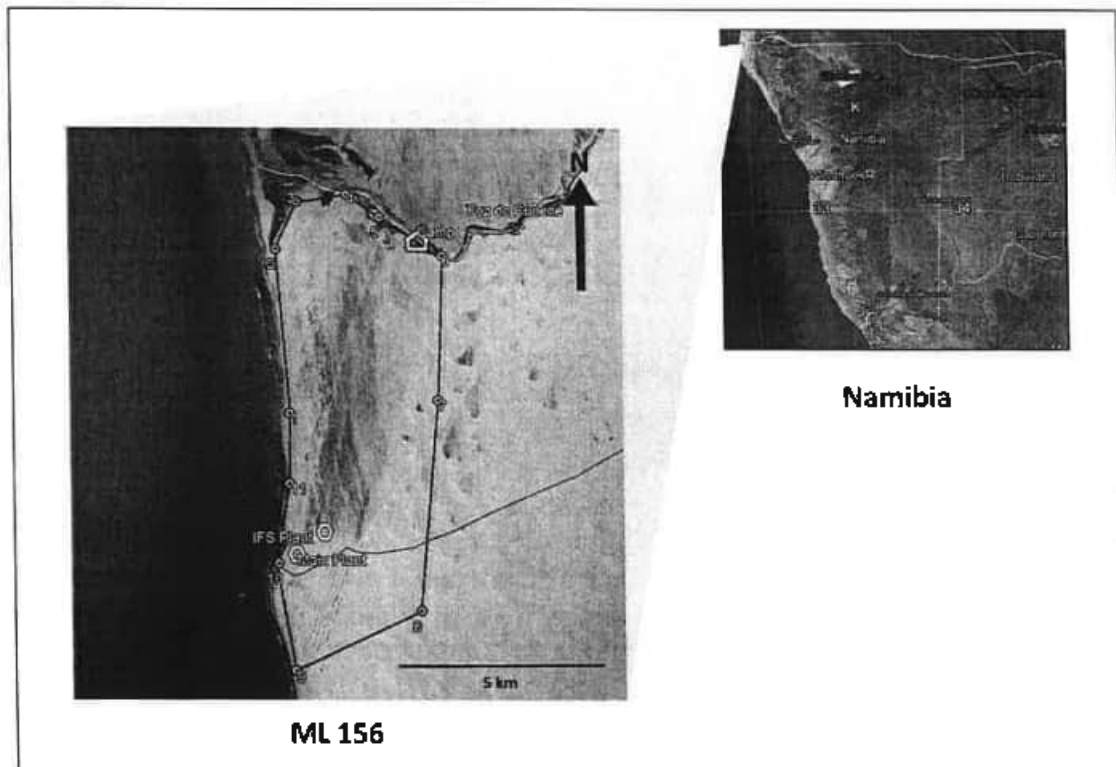
Head Mining Operations and Development

Signature of Applicant Full Name in Block Letters

Position

On behalf of Northern Namibia Development Company (PTY) Ltd

**Figure 1: Location of activity**



MINISTRY OF ENVIRONMENT,  
FORESTRY AND TOURISM  
DIRECTORATE OF ENVIRONMENTAL AFFAIRS  
1-1 JUN 2021  
RECEIVED 1  
Signature:.....

**IMPLEMENTATION AND COMPLIANCE OF THE  
ENVIRONMENTAL MANAGEMENT PLAN FOR MINING LICENCE NO.156,  
KUNENE REGION, NAMIBIA**



**31 May 2021**

**Prepared by:**

Trustco Group Holdings (Pty) Ltd

**Prepared for:**

Northern Namibia Development Company (Py) Ltd

---

CONTACT DETAILS



**Northern Namibia**  
Development Company (Pty) Ltd.

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**TRUSTCO**  
*oshili nawa*

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## 1 Introduction

### 1.1 Background

Northern Namibia Development Company (Pty) Ltd (hereinafter referred to as Northern Namibia Development Company or NNDC) holds the mineral rights for precious stones under Mining License (ML) 156.

The ML, 3405.7815 hectares (ha) in size, is located about 700 kilometers (km) north of Swakopmund, in the north-western corner of Namibia's Skeleton Coast Park; it is bordered by the Atlantic Ocean (to the west), the Kunene River Mouth (north-west), and the Kunene River (and Angola) (to the north) (Figure 1).

Access to ML 156 is attainable by 4x4 vehicle from Terrace Bay, over Möwe Bay and from there, another 270 km along the shoreline through the Skeleton Coast Park. Apart from a Landing Strip at the Kunene River Mouth, there are also landing strips for light aircraft at Terrace Bay and Möwe Bay.

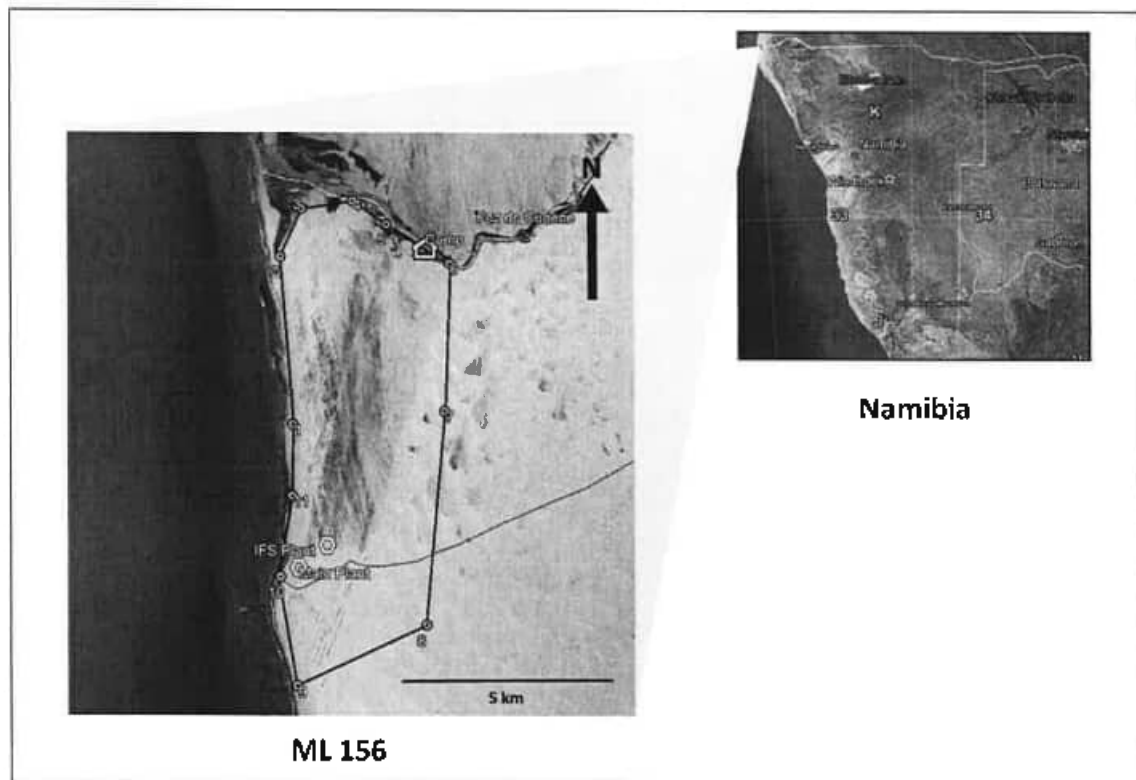


Figure 1: Location of Mining License 156, Kunene Region, Namibia.

In 2008, and in support of the renewal of Exclusive Prospecting Licence (EPL) No 2633, Risk-Based Solutions (RBS) cc conducted an Environmental Impact Assessment (EIA) and prepared an Environmental Management Plan (EMP) on behalf of NNDC. An Environmental Clearance Certificate was obtained from the Ministry of Environment, Forestry and Tourism (MEFT) on 11 August 2008.

An application for the renewal of the Environmental Clearance Certificate (ECC) was submitted to the Office of the Environmental Commissioner, Directorate of Environmental Affairs (DEA), MEFT on 10 January 2013. The ECC was issued by MET on 31 January 2013, valid for three years, i.e. until 30 January 2016.

NNDC submitted a new application, conditional to the approval of Mining Licence ML 156 on 23<sup>rd</sup> November 2017 which was granted on 11<sup>th</sup> July 2018 for another three years until 10<sup>th</sup> July 2021. Risk-Based Solutions cc was contracted by NNDC to conduct a new Environmental Impact Assessment (EIA) and an Environmental Management Plan (EMP) report to support the application for a Mining License which was submitted in line with the Environmental Clearance Certificate (ECC) application.

This report is prepared in aid of an application for the renewal of the ECC that expires on 11<sup>th</sup> July 2021 and it specifically deals with the implementation and compliance of the Environmental Management Plan (EMP) for ML 156, Kunene Region, Namibia. Compliance with the conditions to the ECC is also indicated.

## 2 Statutory Compliance

---

NNDC mine is committed to comply with all applicable legal requirements. NNDC Mine is operating under the following legal obligations and environmental approvals granted by the relevant authorities:

- Ministry of Mines and Energy: 2018, July; Mining License (ML) No.156
- Ministry of Environment, Forestry and Tourism: 2018, July; Environmental Clearance Certificate (ECC)

A complete list of current legal compliance permits and relevant environmental approvals can be found in the table below:

No.	Aspect	Permit/License #	Description	Status
1	Environment	ECC	Environmental Clearance Certificate for NNDC Mine (2018)	Current
2	Mining	ML 156	Mining License for NNDC Mine (2018)	Current
3	Radiation	EPL/325/01/20	Radiation License for the use of Radioactive sources	Current
4	Water	10799	Water abstraction from the Kunene River	Current
5	Water	11284	Water abstraction from the Atlantic Ocean	Current

*Table 1: List of permits, authorisation and relevant environmental approvals made.*

### 3 Operational Activities

---

All operational activities relating to mining, processing and associated engineering activities have been addressed in this report as regards potential impacts and environmental management.

Planned mining operations is by conventional surface mining methods which involve removing layers of sand and gravels using bulldozers and excavators. Material is loaded and hauled by articulated dump trucks to the processing plant for treatment. However, no production activities occurred during the current ECC reporting period (11<sup>th</sup> July 2018 to 10<sup>th</sup> July 2021) as a result of the following:

1. A requirement to upgrade the treatment plant as well as purchasing of additional mining fleet in order to increase production capacity from bulk sampling mode to full commercial production. The treatment plant upgrade is required to increase capacity, ensure liberation of diamonds from cemented material as well as to improve efficiencies in order to provide assurance of ultimate recoveries in line with best practice mineral resource management. The additional mining equipment is required to meet increased capacity as well as to manage waste material and tailings in line with the rehabilitation plan.
2. The downwards global economy trend, exacerbated by the Covid-19 pandemic, resulted in deferral of the capital required to execute the treatment plant upgrade project as well as new mining equipment. NNDC foresees that the current status of affairs will remain for the next 18 to 24 months with no impact on the environment. Only essential personnel are on site to continue with work related to care and maintenance of equipment and facilities which is planned to be retained.

### 4 Environmental Clearance Certificate Requirements

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Compliance with the conditions to the Environmental Clearance Certificate (ECC), dated 11 July 2018, is indicated below (Table 3):

Condition	Compliance
All provisions of applicable legislation and regulations concerning protected areas apply.	All applicable legislation and regulations were considered and applied.
This Environmental Clearance shall serve as a contract of agreement between the holder and the Ministry of Environment and Tourism, but it does not in any way make the Ministry of Environment and Tourism responsible for any wrong or insufficient information provided, nor any adverse effects that may arise from this project's activities. Instead, full responsibility and accountability rest with the developer and his/her consultants.	NNDC took full responsibility and accountability for the project's activities.
The Holder of this Environmental Clearance (hereafter referred to as the Holder) assumes full responsibility and liability for the safety and conduct of employees, contractors and/or visitors.	NNDC took full responsibility and liability for the safety and conduct of all its employees and visitors. NNDC has an ESHS Policy, Management System and legal appointees in place to ensure accountability.

Entry and exit points to the park as the driving routes to be followed in the Park, shall be determined by this Ministry in its sole discretion and shall be communicated to the Holder in writing. The Holder shall strictly adhere to the designated entry points, exit points and driving routes.	NNDC adheres to the designated entry and exit points and all driving routes.
Only existing tracks or roads may be used unless prior approval is obtained from the Ministry.	No new tracks during the reporting period (11 <sup>th</sup> July 2018 to current)
The Holder shall erect a signboard not smaller than 70 cm in height and 100 cm in width, at the major entrance to each of its license areas, specifying the name of the license, the duration of its validity and the name of the license holder, and a contact name and number for enquiries.	NNDC duly erected signboards according to the MEFT's specifications at all entrances (Figure 2).
The Holder acknowledges that designated staff of this Ministry may monitor the Park and the activities of the Holder within the park in order to verify adherence to the conditions imposed in this authorization. The Holder undertakes to give its full cooperation to the designated staff in this regard.	Representatives from the MEFT visited Mining Licence No. 156 area over the reporting period. These visits were conducted in good spirit and the representatives from MEFT were satisfied with the overall conditions of the area.
A six-monthly report on project progress and environmental management profile, starting from date of commencement of operations, must be submitted by the Holder to the Ministry of Environment and Tourism, particularly, the Department of Environmental Affairs, and Directorate of Parks and Wildlife Management.	Bi-annual (6 monthly) reports have been submitted for the reporting period (Table 5).
Boating, biking, swimming, fishing, hunting, wood gathering or the collection of soil, insects, birds, animals and plants, including the introduction of pets and weapons of all types, are strictly prohibited within the jurisdiction of a protected area.	Weapons and activities required for security protection are all declared and approved. No other prohibited activities are conducted within the Mining Licence No 156 area.
Unless permitted by the Ministry of the Environment Forestry and Tourism, the operation of an aircraft and the construction of a runway, including any other attempt to harvest natural resources for any form of construction purposes, shall not be allowed in all protected areas. Where the construction of structures is allowed, the design of such structures must be of a temporary nature.	The NNDC runway is required for emergency and export of product. The design is of temporary nature and part of the rehabilitation plan.
There shall be no voluntary disposal of any form of waste in all protected areas of the Republic of Namibia. A suitable waste storage facility must be constructed to serve as a waste retention device prior to transportation out of the protected area.	A waste management plan has been developed ensuring all waste is managed properly on site and sent off site to an approved disposal facility.
Using the best and affordable methodology, the Holder must ensure that all mining or quarrying and exploratory operations are thoroughly rehabilitated prior to closure of the operation. Wherever possible, the Holder must proceed with the rehabilitation process concurrently with the progression of the project rather than wait until the damage is far beyond the available means of management.	The mine plan includes concurrent rehabilitation of mining areas through planned stripping and non-diamond bearing (waste sand) material replacement.

The general standard for all rehabilitation processes must at all costs aim at restoring the natural character of the environment to the satisfaction of the Ministry of Environment and Tourism. Such rehabilitation processes shall be inspected and certified satisfactory or unsatisfactory by the Ministry of Environment and Tourism. Where a certificate of unsatisfactory is issued, the Holder shall be advised to carry-out certain tasks to meet the requirements. Failure to meet the basic rehabilitation requirements shall be regarded by this Ministry as a breach of this contract and of which serious consequences shall follow.

Rehabilitation conducted as per rehabilitation plan.

Table 2: ECC conditions and compliance



Figure 2: Mining License entrance signboard as per ECC specifications

## 5 Environmental Management Plan Implementation

The environmental management plan (EMP) was developed to address the operational environmental risks associated with the planned NNDC mining operations. The EMP is an action plan to facilitate the implementation of the commitments made to reduce the potential impacts identified. The EMP implementation is supported through the environmental management system with plans, procedures and measuring and monitoring programs specific to the site operational activities.

The NNDC environmental management performance, compliance and implementation to the approved EMP, has been reported to MEFT on a biannual basis. A summary of the EMP performance evaluation is included in the *Table 3* below.

No	Aspect	Potential significant impacts/issues of concern	Management Objectives and commitments	Status on commitment
1	Air quality	1. Excessive release of nuisance dust and particulate matter 2. Excessive release of hazardous gaseous emissions	<ul style="list-style-type: none"> <li>Achieve compliance to the adopted best practice standards.</li> </ul>	Implemented and monitored / ongoing improvements
2	Surface water	3. Contamination of surface water due to operational activities	<ul style="list-style-type: none"> <li>Minimize the discharge of contaminated surface water to the surrounding environment to reduce impacts to sensitive receptors.</li> <li>Avoid over abstraction from sea and river resource.</li> </ul>	Implemented and monitored / ongoing improvements
4	Biodiversity	4. Physical disturbance to fauna and flora due to operational activities 5. Functional disturbance to ecological drivers (loss of habitats, topsoil value)	<ul style="list-style-type: none"> <li>Prevent disturbance to biodiversity or limit the unacceptable loss of biodiversity and related functionality through physical disturbance, a reduction in the key ecological drivers of surface water flow.</li> </ul>	Implemented and monitored – no disturbance in key ecological drivers.
5	Resources	6. Depletion of resources 7. Accidental release of resources may lead to contamination	<ul style="list-style-type: none"> <li>Monitor the consumption of resources; energy, fuel, water manufactured materials and find ways to minimize consumption, optimize and ensure efficient use.</li> </ul>	Implemented and monitored / ongoing improvements
6	Waste	8. Pollution to land, ground and surface water 9. Nuisance	<ul style="list-style-type: none"> <li>Minimize impacts of wastes to the environment, by minimal disposal and optimize on recovery, recycling and treatment.</li> </ul>	Implemented
7	Archaeology	10. Loss of significant heritage resources 11. Damage to heritage sites	<ul style="list-style-type: none"> <li>Prevent the unacceptable loss of archaeological sites and related historical information.</li> <li>Ensure employees and contractors are aware of chance archaeological finds.</li> </ul>	Implemented and maintained
8	Noise	12. Noise pollution	<ul style="list-style-type: none"> <li>Limit excessive noise pollution,</li> </ul>	Implemented and



				monitored / ongoing improvements
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**Table 3: EMP performance evaluation**

The following sections summarise the performance of the EMP implementation during the reporting period (2018 – 2021) for the Mining License (ML 156) area.

### 5.1 Surface Water management

The NNDC mine EMP commitments on surface water focused on water supply and contamination of surface water. The following objectives were set:

- To minimize the impact of the proposed water supply;
- To prevent unacceptable groundwater pollution related impacts.

Surface water is the main source of water for the NNDC operations. Two abstraction permits have been awarded to extract water from the Kunene River and from the Atlantic Ocean. The International Finance Corporation (IFC) performance standards are being followed to guide the management of surface water extraction.

NNDC’s Kunene River abstraction permit (No.10799) allows for the abstraction of 75000m<sup>3</sup> per annum for domestic and industrial purposes. NNDC’s Kunene Seawater abstraction permit (No.11284) allows for the abstraction of seawater for industrial purposes only. Water abstraction was within permit allocation limits for the reporting period.

### 5.2 Waste management

NNDC has an effective waste management process to ensure minimal risks to the environment, wildlife and people. Mineral waste is managed and stored as approved through the EIA studies, EMP and rehabilitation plan.

Non-mineral waste generated through operational activities are managed through a waste management program supported by the waste management plan and EMP. The EMP commitment is to ensure proper storage, recycling, re-using, removal, transportation and disposal of non-hazardous solid waste and hazardous waste. Waste management is guided by the process of recovering as much reusable and recyclable waste materials as possible, treating and disposing the rest of the waste material which cannot be reused or recycled. As much as possible, waste is separated and collected for recycling. Non-mineral waste is therefore managed through daily site operational activities which include routine inspection of waste areas, maintenance of waste management resources, continuous awareness training of employees and visitors on waste practices, safe storage and transportation of waste and maintaining waste related records (Figure 3).



*Figure 3: Waste and scrap material transported by truck from the mine and out of Skeleton Coast Park*

### 5.3 Biodiversity

The rehabilitation plan requires that the planted vegetation and the invasive alien flora must be removed during closure whilst hummocks need to be re-vegetated with *Salsola* sp. where impacted by the mining activities. No disturbance of hummocks occurred during the reporting period.

### 5.4 Archaeology

No heritage finds were identified during the EIA studies. However, NNDC has committed to:

- To prevent the unacceptable loss of archeological sites and related historical information;
- To ensure that the correct actions are taken to preserve or document chance archeological finds.

There have been no new archaeological finds during the reporting period.

## 6 Stakeholder Consultations

### 6.1 Stakeholder Engagements

NNDC's communication and engagement with stakeholders is ongoing. Feedback on environmental management performance has been provided to the key government stakeholders as follows:

- Consultations with key government stakeholders on environmental issues; reporting, permit applications, amendments and general consultations;
- Site visits by regulatory authorities;
- Non-governmental organisations for educational and research purposes.

The following stakeholders visited NNDC during the reporting period:

Date	Activity	Description	Participants
08/09/2018	International Coastal Clean-up Day	NNDC participated in the International Coastal Clean-up day campaign that took place in the Skeleton Coast National Park under the leadership of the Chief Warden, Mr. Joshua Kazeurua.	Local youth group, Terrace Bay Police, Sam Nujoma Primary School, Namibia Wildlife Resort (NWR) staff and Torra Conservancy youth.
12/06/2019	Northern Skeleton Coast Park Stakeholder meeting	Meeting held to establish a Stakeholder's Forum for the Northern Section of the Skeleton Coast National Park (SCNP) in order to address specific challenges experienced in various areas of managing the park.	Chief Warden, Mr. Joshua Kazeurua; all park stakeholders.
21/09/2019	International Coastal Clean-up Day	NNDC participated in the International Coastal Clean-up day campaign that took place in the Skeleton Coast National Park under the leadership of the Chief Warden, Mr. Joshua Kazeurua.	Local youth group, Terrace Bay Police, Sam Nujoma Primary School, Namibia Wildlife Resort (NWR) staff and Torra Conservancy youth.
27/01/2020	Kunene Mouth area visit	Research team visit from NUST, conducting research survey work regarding the anticipated establishment of the Skeleton Coast IONA Trans-Frontier Park.	SCIONA Transboundary Workgroup (NUST) – <i>Figure 4.</i>
01/06/2020	MET Kunene Mouth area visit	Visit by consulting group from MEET and other stakeholders to review the Park management Plan.	Dr Malan Lindeque, MEET
15/06/2020	Kunene Mouth area visit	Visit by the Skeleton Coast Brown Hyena Project members to observe, record, photograph and collar brown hyenas in the northern part of the Skeleton Coast Park.	Ms Emsie Verwey, Skeleton Coast Brown Hyena Project members
30/06/2020	Kunene Mouth area visit	The Governor of the Kunene Region with a management team visited the area.	Hon. Governor Marius Sheya; Management Team
01/09/2020 and	FCN Mine visit	The Electoral Commission visited the mine to provide awareness for the elections and to	Electoral Commission of Namibia.

07/09/2020		assist personnel with their voter's registration.	
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**Table 4: Stakeholder engagements**



**Figure 4: SCIONA work group working at the Kunene Mouth and at the dunes**

## 6.2 Stakeholder Communications

The EMP objectives set for the general stakeholder communication were as follows:

- To ensure that ongoing feedback is provided on the relevant mining activities, together with feedback on the environmental management performance of the mine, and that opportunity is provided for interested and affected parties to raise comments and concerns.
- To ensure communication/engagement strategies meet the needs of stakeholders

The following reports/applications (*Table 5*) have been submitted to the MEFT/MAWLR over the period the ECC was valid for:

Report / Application	Date of Submission	Status
Bi-Annual Environmental Report (Jul – Dec '18) for ML 156, Kunene Region, Namibia	17 January 2019 to DEA and Directorate of Parks and Wildlife Management.	A stamped and/or signed copy is kept on file as a form of proof acknowledgment of receipt.
Bi-Annual Environmental Report (Jan – Jun '19) for ML 156, Kunene Region, Namibia	26 June 2019 to DEA and 27 June 2019 to the Directorate of Parks and Wildlife Management.	A stamped and/or signed copy is kept on file as a form of proof acknowledgment of receipt.
Bi-Annual Environmental Report (Jul – Dec '19) for ML 156, Kunene Region, Namibia	26 February 2020 to DEA and the Directorate of Parks and Wildlife Management.	A stamped and/or signed copy is kept on file as a form of proof acknowledgment of receipt.
Abstraction permit renewal application for freshwater abstraction (Permit no.10799) for ML 156, Kunene Region, Namibia	26 March 2020 to the Department of Water affairs and Forestry.	A stamped and/or signed copy is kept on file as a form of proof acknowledgment of receipt. New permit received on 25 August 2020.

Bi-Annual Environmental Report (Jan – Jun '20) for ML 156, Kunene Region, Namibia	13 July 2020 to DEA and the Directorate of Parks and Wildlife Management.	A stamped and/or signed copy is kept on file as a form of proof acknowledgment of receipt.
Bi-Annual Environmental Report (Jul – Dec '20) for ML 156, Kunene Region, Namibia	29 January 2021 to DEA and the Directorate of Parks and Wildlife Management.	A stamped and/or signed copy is kept on file as a form of proof acknowledgment of receipt.
Bi-Annual Environmental Report (Jan – Jun '21) for ML 156, Kunene Region, Namibia	To be submitted within the first two weeks of July.	Due July 2021.

**Table 5: Compliance Reporting**

The objective to ensure communication and engagement strategies to meet the need of stakeholders has been addressed with the development of the communication policy. This policy includes internal and external communication.

## **7 Environmental Management System**

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The NNDC mine operates and manages environmental impacts under an Environmental Management System (EMS) to encourage diligence and consistency in environmental management across the project site. THE EMS provides structure, guidelines and standards for continuous improvement in environmental performance.

The EMS also provides for a process to identify, correct and mitigate operational risks and impacts. Incidents, non-compliances and non-conformances are recorded and corrective actions are applied.

Over the reporting period, no major environmental incidents were recorded. However, a vehicle accident occurred close to the NNDC mine and NNDC assisted recovering the vehicle as well as arranging an air ambulance to enable emergency evacuation of the injured people.

## **8 Conclusion**

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NNDC Mine operation's management commitments and mitigation measures continue to be implemented and maintained to minimise potential impacts during the current care and maintenance state as well as throughout the planned life of the mine. All legal requirements and other relevant standards and best practices are applied to provide effective management of environmental risks by the NNDC operations.

This report has provided the environmental performance and compliance on management commitments implemented as per the NNDC EMP. Effective environmental performance of the NNDC mine operations have been achieved.

Based on the accounts of this three-year compliance and performance report, it is kindly requested that the ECC for the NNDC mine operations be renewed for the operational phase to continue as soon as possible.

## **Annexure B**

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13 April 2022

To Whom It May Concern

**RE: APPOINTMENT OF ENVIRONMENTAL CONSULTANT (ML156)**

Northern Namibia Development Company (Pty) Ltd hereby confirms that Dr. Lima Maartens T/A LM Environmental Consulting has been appointed as the Environmental Assessment Practitioner for the Renewal of The Environmental Clearance Certificate for Mining License Area ML156.

Your assistance is highly appreciated

Yours sincerely



J.J. van Rooyen  
Management Head



20 April 2022

The Environmental Commissioner  
Ministry of Environment, Forestry and Tourism  
Private Bag 13306  
Windhoek

Attention: Mr Timoteus Mufeti

Re: APP-002733

Dear Mr Mufeti,

Hereby a request to please delete application APP-002733 from the online portal, the reasons being as follows:

- Iyaloo Akuaake, Trustco Group Holdings Ltd's Environmental Officer, has left the Company to further her studies in Cape Town; the Application was registered using her e-mail address [IyalooA@tgh.na](mailto:IyalooA@tgh.na) (that is not in use anymore);
- Some of the information on Form 1 was incorrect e.g. the renewal application for the ECC was for the *Environmental Scoping, Impact Assessment and Management Plan for the Conversion of Exclusive Prospecting License (EPL) 2633 to Mining License (ML) 156 for the Mining of Precious Stones by Northern Namibia Development Company (Pty) Ltd, Kunene Region, Namibia* (and not an Environmental Management Plan).
- Form 1 was not submitted to the Executive Director, Ministry of Mines and Energy (as the Competent Authority), and only to the Ministry of Environment Forestry and Tourism.
- Northern Namibia Development Company (Pty) Ltd appointed Dr Lima Maartens T/A LM Environmental Consulting as the Environmental Assessment Practitioner (she prepared the *Environmental Scoping, Impact Assessment and Management Plan for the Conversion of Exclusive Prospecting License (EPL) 2633 to Mining License (ML) 156 for the Mining of Precious Stones by Northern Namibia Development Company (Pty) Ltd, Kunene Region, Namibia* in 2018) for the Renewal of the Environmental Clearance Certificate (and it was thought best to start from scratch).

All comments and queries as a result of the submission can be addressed to me.

Yours sincerely,



J.J. van Rooyen  
Head Mining Operations and Development



REPUBLIC OF NAMIBIA

## MINISTRY OF ENVIRONMENT, FORESTRY AND TOURISM

Tel: (00 264) 61 284 2111

Fax: (00 264) 61 232 057

Cnr Robert Mugabe &  
Dr Kenneth Kaunda Street  
Private Bag 13306  
Windhoek  
Namibia

E-mail: [josafat.hiwana@met.gov.na](mailto:josafat.hiwana@met.gov.na)

Enquiries: Mr. Josafat Kondjeni Hiwana

12 May 2022

**APP-002733**

### OFFICE OF THE ENVIRONMENTAL COMMISSIONER

Dr Lima Maartens  
LM Environmental Consulting  
P.O. Box 1284  
Windhoek

Dear Dr Maartens

**SUBJECT: APPLICATION FOR ENVIRONMENTAL CLEARANCE CERTIFICATE FOR THE RENEWAL APPLICATION FOR MINING LICENSE (ML) 156, KUNENE REGION, NAMIBIA**

The above subject has reference:

Kindly update your report to include the followings;

1. The map indicating the designated routes to be used needs to be provided. This because mine vehicles do not always stay on a single route.
2. New signboards to be erected as the old ones are in bad state.
3. Advise the proponent to remove the items that are not approved by Clause 14, i.e. boating, bikes, fishing and hunting.
4. The mine staff have gathered many shipwreck artefacts and drift wood pieces along the coast and used them for building and display in their camp. There are also several turtle shells, crocodile skins, whale bones, on display in the camp. This contravenes the park regulations and the Environmental Clearance Certificate (ECC) based on the provided Environmental Management Plan (EMP).

**“Stop the poaching of our rhinos”**

All official correspondence must be addressed to the Executive Director



5. There is also a runway /airstrip which is poorly regulated. The company should provide this Ministry with all related permits in relation to the operation of the airstrip.
6. There is no concurrent rehabilitation going on at the site. This has raised a concern considering the mining activities stopped four (4) years ago and all the equipment were moved out of the park. The inspection team noted that NNDC never conducted any form of rehabilitation/restoration on already explored areas within the mining area.
7. I, therefore, request NNDC to return ALL artefacts to Mowe Bay and caution their staff not to touch any artefacts, shipwreck and, or any other items within the Park.

Yours sincerely,

17 MAY 2022

Timoteus Mufeti

**ENVIRONMENTAL COMMISSIONER**



22 June 2022

The Environmental Commissioner  
Ministry of Environment, Forestry and  
Tourism  
Private Bag 13306  
Windhoek

Attention: Mr Timoteus Mufeti  
Cc: Dr Lima Maartens



Dear Mr Mufeti

**RE: Application of Environmental Clearance Certificate for the Mining Licence (ML) 156,  
Kunene Region**

With reference to your letter (APP-002733 – dated 12 May 2022), NNDC wishes to update the Office of the Environmental Commissioner as follows:

1. Map indicated designated routes.
  - 1.1 Within ML156 – map attached as *Appendix 1*
  - 1.2 Rest of route within Park – map will not contribute due to scale and therefore the following description of roads used by NNDC.
    - The existing public tar road from Swakopmund to Henties Bay.
    - The existing public salt road from Henties Bay to Terrace Bay.
    - The existing public gravel road from Terrace Bay to Möwe Bay.
  - 1.3 No official roads exist from Möwe Bay to ML156. NNDC's is committed and regularly discuss with all drivers to use only one track on the gravel plains. NNDC drivers use/do the same in sandy and dune areas even though these rehabilitate quickly. Please note that light vehicles and trucks cannot use the same track in the sandy and dune areas due to different axle widths. Various other stakeholders (MEFT, MME, MFMR, NamPort, NamPol, Kunene Regional Government and various tourist groups) travel between Möwe Bay and ML 156 of which NNDC has no jurisdiction and therefore cannot be accountable.



2. NNDC is in the process to assess all signboards and will replace where required.
3. The following items were removed:
  - 3.1 Quad Bikes – removed even though these were used for patrol and maintenance and not for recreational activities.
  - 3.2 All fishing equipment.
  - 3.3 Firearms – declared (*Appendix 2*) for security purposes only (not used for hunting).
  - 3.4 Outboard motors used by historical exploration have been removed.
4. All artefacts, turtle shells, crocodile skins and bones, identified by the Chief Warden of the Park, were delivered to the Ranger at Möwe Bay on 21 May 2021, 21 May 2022 and 13 June 2022. Rest of items was returned to the shoreline.
5. The landing strip operated by NNDC is regulated and all flights are reported to MME in line with regulations. The landing strip was included in the EIA done for ML156. The landing strip is extremely important for the following reasons (*Appendix 3*):
  - Emergencies
  - Diamond exports
  - Government (NamPol, NDF and MHSS)
  - Tourism (Skeleton Coast Adventure Tours)
6. NNDC is currently under care and maintenance and some equipment has been removed due to the severe impact of west coast weather on equipment (*Not all – Appendix 4*). Rehabilitation is budgeted concurrent with operations as an ongoing process as part of mining operations. Historical mined areas have been rehabilitated (*Rehabilitation Map – Appendix 5*) and only current mining pits are open. The planned Plant Upgrade Project together with additional new equipment will be executed when conditions are found favourable and mining of these pits will continue when operations resume.

Yours sincerely,



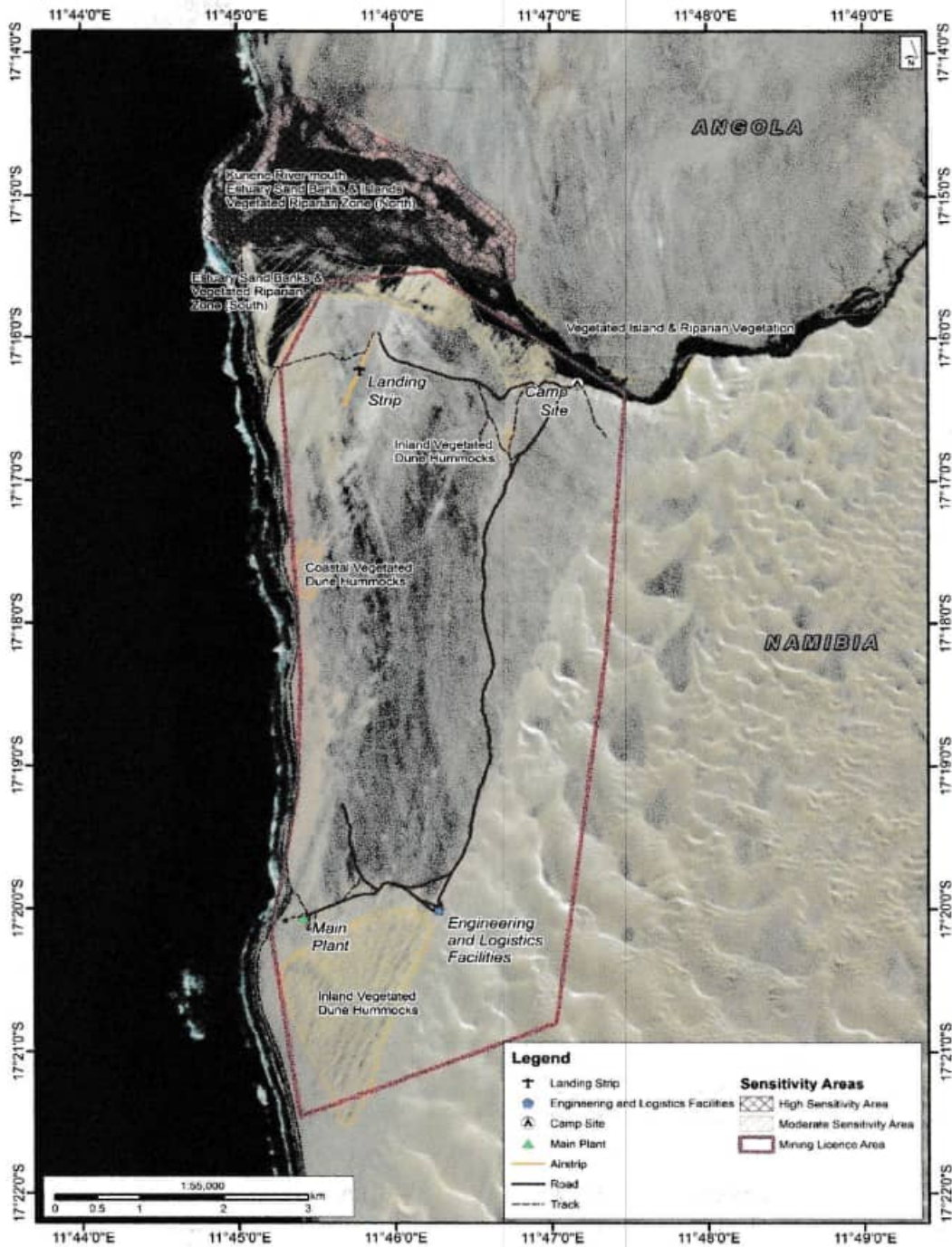
**Johan van Rooyen**

**Head of Mining, Operations and Development**

27 JUN 2022

Signature: 

APPENDIX 1



Map showing the roads and tracks within the area of ML156. These are roads used during normal operations of the mine. (Source: Cunningham, 2018; Map prepared by M. Prickett, Linear Design & Mapping, January 2018).

## APPENDIX 2



**Northern Namibia**  
Development Company (Pty) Ltd.

Tel (Whk): +264-61-2754000  
Tel (Mine): +264-65-685013  
E-Mail: johanvr@tgh.na

PO Box 11363  
Windhoek  
31 August 2015

Mr Joshua Kazeurua  
Park Warden  
Skeleton Coast Park  
Ugab Gate

Dear Mr Kazeurua

### RE: DECLARATION OF FIREARMS


Our telephone conversation on 30 August 2016 has reference.

NNDC, as a diamond mining company, requires that security officials must have firearms available for security and protection purposes. Attached please find copies of the relevant licenses.

NNDC hereby confirms that the following firearms are on EPL2633 at the Kunene Rover Mouth under the control of the Security Department:

1. Rifle
  - a. Make: Ruger.
  - b. Calibre: .223 Rem
  - c. Serial No: 182-278411.
2. Pistol
  - a. Make: Phoenix
  - b. Calibre: 9x19
  - c. Serial No: RSA342722

Yours sincerely



JOHAN VAN ROOYEN  
HEAD MINING OPERATIONS AND DEVELOPMENT

---

NORTHERN NAMIBIA DEVELOPMENT COMPANY (PTY) LTD

Registration Number: 30/439

Trustco House, 2 Kalier Street, Windhoek, Namibia / PO Box 11363, Windhoek, Namibia \ Tel: +264 61 275 4000 \ Fax: +264 61 275 4090

Directors: D. van Rooyen and S. van Rooyen

**Copy of letter submitted to the Chief Warden of Skeleton Coast park to confirm and declare the presence of firearms at the mine. (Source: Johan van Rooyen – NNDC Manager).**



**APPENDIX 3**



**V5-DAC at NNDC landingstrip in February 2021 for emergency evacuation of injured tourist. (Source: Johan van Rooyen – NNDC Manager)**



**V5-UHG at NNDC landingstrip in November 2021 for emergency evacuation of sick tourist. (Source: Johan van Rooyen – NNDC Manager)**

MINISTRY OF ENVIRONMENT, FORESTRY AND TOURISM
DIRECTORATE OF ENVIRONMENTAL AFFAIRS
27 JUN 2022
RECEIVED
Signature 



**V5-HWS of Namibia Parks & Wildlife at NNDC landingstrip during official research assignment at the Kunene River Mouth in April 2021. (Source: Johan van Rooyen – NNDC Manager**



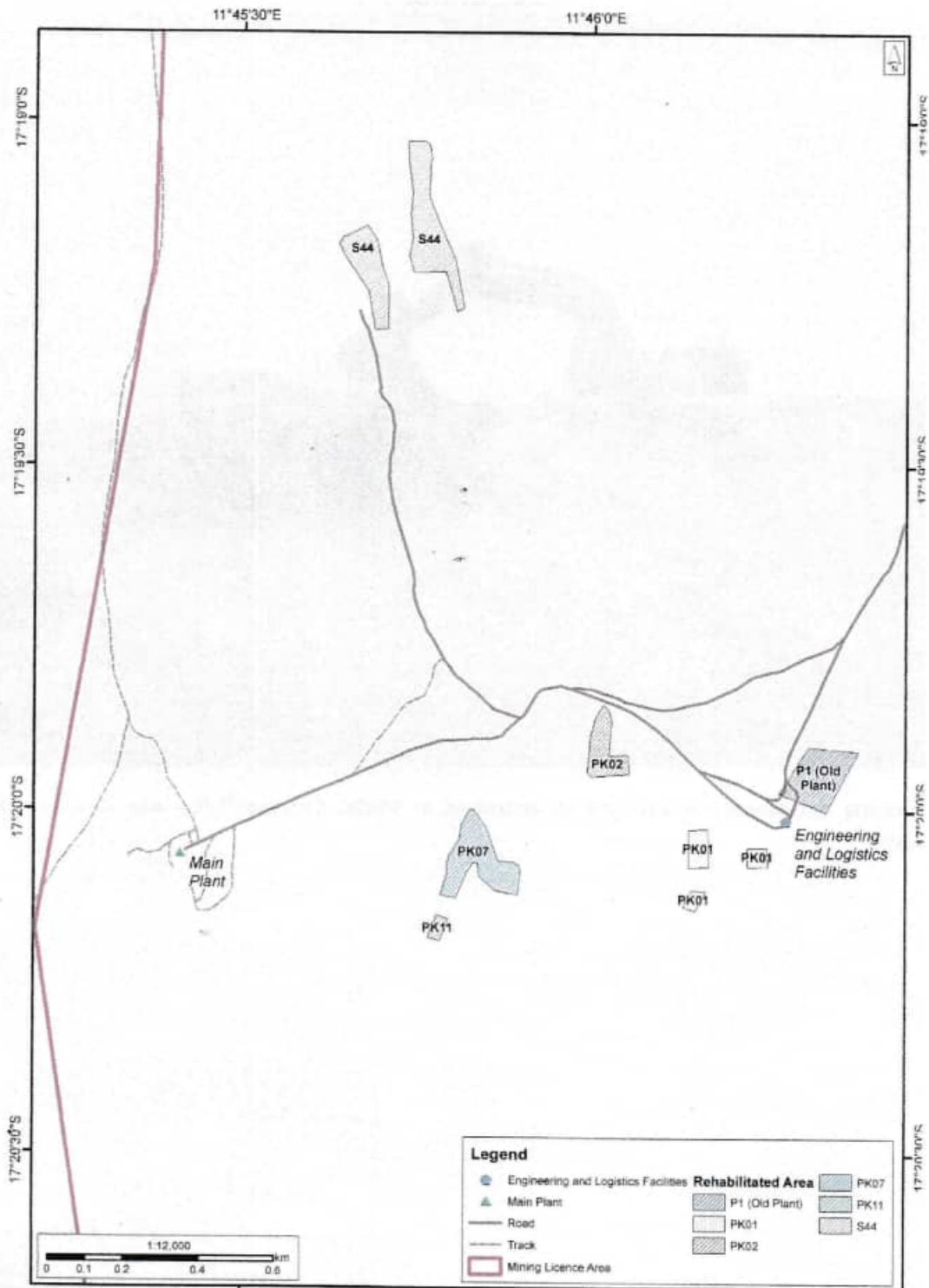
**APPENDIX 4**



**Earthmoving equipment on site and in operation at NNDC. (Source: Johan van Rooyen – NNDC Manager)**

MINISTRY OF ENVIRONMENT,  
FORESTRY AND TOURISM  
DIRECTORATE OF ENVIRONMENTAL AFFAIRS  
27 JUN 2022  
RECEIVED  
Signature: 

### APPENDIX 5



Map of rehabilitated mining blocks at ML156. (Source: Paulus Nghimtina – NNDC Production Manager)

23 June 2022

The Environmental Commissioner  
Ministry of Environment, Forestry  
and Tourism  
Private Bag 13306  
Windhoek

**Attention:** Mr Timoteus Mufeti  
**Cc:** Dr Lima Maartens



Dear Mr Mufeti

**RE: Application of Renewal of Environmental Clearance Certificate (ECC) for the Mining License (ML) 156, Kunene Region**

The application for the renewal of the environmental clearance certificate for mining license (ML) 156, by Northern Namibia Development Company (NNDC) has reference.

NNDC wishes to brought to the attention of the Office of the Environmental Commissioner that NNDC operations have been suspended since 1 July 2017 and has been under care and maintenance ever since. No mining or processing activities took place since the issuance of the ECC for the conversion of EPL2633 to ML156. This situation was brought about by the following:

1. NNDC's exploration and bulk sample activities (EPL2633) were suspended since end of June 2017 in anticipation of the mining license being granted as security of tenure was required for large capital approval to upgrade the sample plant to a production plant as well as to increase mining capacity. All personnel were placed on paid leave from 1 July 2017 with only a very small team remaining to attend to the care and maintenance of facilities and equipment.
2. NNDC obtained Environmental Clearance for the Conversion of Exclusive Prospecting License (EPL) 2633 to Mining License (ML) 156 on 16 July 2018.
3. NNDC received the Mining License (ML156) at the end of July 2018 and NNDC then started a process of remobilising all personnel and equipment to resume mining and exploration activities as soon the planned Upgrade Project could be



finalised and tenure obtained for the capital approval.

4. NNDC's operations, however, was not immune to the severely negative impact that the COVID-19 pandemic had on the global economy and the diamond sector in particular. After a strategic review of the economic impact on the mining and diamond sector in the medium to long-term, NNDC, regrettably, had to keep NNDC under care and maintenance and retrench non-essential staff at the end of March 2020.
5. Bi-Annual Reports for the periods: June-December 2019; January-June 2020; July-December 2020; January-June 2021; and July-December 2021 were submitted to the Office of the Environmental Commissioner. Also, a report *Implementation and Compliance of the Environmental Management Plan for Mining License No. 156, Kunene Region, Namibia* was submitted, together with the Application for the Renewal of the ECC, to the Office of the Environmental Commissioner on 11 June 2021.
6. The Executive Committee had been constantly monitoring and considering economic circumstances, market conditions and global economic trends. Conditions, however, remain unfavourable and the Company has not been able to execute the reactivation of the Project.
7. NNDC, therefore, has been under care and maintenance since obtaining the ECC and the issuance of ML156. Some equipment was removed (due to the severe impact of west coast weather), but with a core element remaining for care and maintenance. The planned Plant Upgrade Project together with additional new equipment will be executed when conditions are found favourable.

Yours sincerely,



**Johan van Rooyen**  
**Head of Mining, Operations and Development**



**Northern Namibia**  
Development Company (Pty) Ltd.

24 June 2022

The Environmental Commissioner  
Ministry of Environment, Forestry and Tourism  
Private Bag 13306  
Windhoek

Attention: Mr Timoteus Mufeti

Re: APP-002733

Dear Mr Mufeti,

Hereby a request to please delete application APP-002733 from the online portal. Northern Namibia Development Company wishes to start the process from scratch. The reasons being as follows:

- Me Iyaloo Akuaake, Environmental Officer for Trustco Group Holdings Ltd, resigned and left the Company to further her studies in Cape Town. The Application (APP-002733) was registered using her e-mail address [lyalooA@tgh.na](mailto:lyalooA@tgh.na). This e-mail address is not in use anymore and the process cannot go ahead.
- Northern Namibia Development Company (Pty) Ltd appointed Dr. Lima Maartens T/A LM Environmental Consulting as the Environmental Assessment Practitioner (she prepared the *Environmental Scoping, Impact Assessment and Management Plan for the Conversion of Exclusive Prospecting License (EPL) 2633 to Mining License (ML) 156 for the Mining of Precious Stones by Northern Namibia Development Company (Pty) Ltd, Kunene Region, Namibia* in 2018) for the Renewal of the Environmental Clearance Certificate. It was decided that it would be best that she start the whole process from scratch with a new application under her name and e-mail address [lima@iway.na](mailto:lima@iway.na).

All comments and queries as a result of the submission can be addressed to me.

Your assistance is highly appreciated

Yours sincerely,

J.J. van Rooyen  
Head Mining Operations and Development



**From:** Lima Maartens [lima@iway.na](mailto:lima@iway.na)  
**Sent:** Friday, September 23, 2022 8:51 AM  
**To:** Damian Nchindo (damian.nchindo@meft.gov.na) [damian.nchindo@meft.gov.na](mailto:damian.nchindo@meft.gov.na)  
**Subject:** FW: Re APP-002733 - NNDC

Hi Damian

See attached as discussed telephonically.

Regards  
Lima

Dr. Lima Maartens



Telephone: +264 61 255750  
Mobile: +264 81 2458790  
e-mail: [lima@iway.na](mailto:lima@iway.na)  
PO Box 1284,  
Windhoek, Namibia

**From:** Lima Maartens [lima@iway.na](mailto:lima@iway.na)  
**Sent:** Monday, June 27, 2022 12:19 PM  
**To:** Josafat Hiwana (Josafat.Hiwana@meft.gov.na) <Josafat.Hiwana@meft.gov.na>; Damian Nchindo (damian.nchindo@meft.gov.na) <damian.nchindo@meft.gov.na>; Saima Angula (Saima.Angula@meft.gov.na) [Saima.Angula@meft.gov.na](mailto:Saima.Angula@meft.gov.na)  
**Cc:** 'Johan Van Rooyen' [johanvr@tgh.na](mailto:johanvr@tgh.na)  
**Subject:** Re APP-002733

Dear Josafat

I trust that you are well.

Attached please find the response to your letter (App 002733) from NNDC.

I am also attaching two more letters from NNDC; one to have the online application deleted (so that we can re-submit all the documents – as suggested by Damian), and then also one re the renewal of the ECC.

I submitted the three letters in hard copy to your offices this morning.

I am looking forward to a response from you re the next steps at your earliest convenience.

Regards  
Lima



Dr. Lima Maartens



Telephone: +264 61 255750  
Mobile: +264 81 2458790  
e-mail: [lima@iway.na](mailto:lima@iway.na)  
PO Box 1284,  
Windhoek, Namibia

**From:** Josafat hiwana <[Josafat.hiwana@mef.gov.na](mailto:Josafat.hiwana@mef.gov.na)>  
**Sent:** 12 May 2022 11:29  
**To:** Saima Angula <[Saima.Angula@mef.gov.na](mailto:Saima.Angula@mef.gov.na)>; damian nchindo2 <[damian.nchindo2@mef.gov.na](mailto:damian.nchindo2@mef.gov.na)>; Damian Nchindo <[damian.nchindo@mef.gov.na](mailto:damian.nchindo@mef.gov.na)>; [lima@iway.na](mailto:lima@iway.na)  
**Cc:** 'Johan Van Rooyen' <[johanvr@tgh.na](mailto:johanvr@tgh.na)>  
**Subject:** Re: Re APP-002733

Dear Lima,

Attached find the letter on the above mentioned application for your considerations.

Kind regards,  
Josafat

**From:** Lima Maartens <[lima@iway.na](mailto:lima@iway.na)>  
**Sent:** Monday, May 9, 2022 9:02:21 AM  
**To:** Josafat hiwana; Saima Angula; damian nchindo2; Damian Nchindo  
**Cc:** 'Johan Van Rooyen'  
**Subject:** RE: Re APP-002733

Dear Josafat

Thank you for getting back to me and no problem.

Regards  
Lima

**From:** Josafat hiwana <[Josafat.hiwana@mef.gov.na](mailto:Josafat.hiwana@mef.gov.na)>  
**Sent:** 09 May 2022 08:33  
**To:** Saima Angula <[Saima.Angula@mef.gov.na](mailto:Saima.Angula@mef.gov.na)>; damian nchindo2 <[damian.nchindo2@mef.gov.na](mailto:damian.nchindo2@mef.gov.na)>; Damian Nchindo <[damian.nchindo@mef.gov.na](mailto:damian.nchindo@mef.gov.na)>; [lima@iway.na](mailto:lima@iway.na)  
**Cc:** 'Johan Van Rooyen' <[johanvr@tgh.na](mailto:johanvr@tgh.na)>  
**Subject:** Re: Re APP-002733

Dear Dr Maartens,

I had been out of the office, and i am back now. I will prepare the formal letter of comments from parks for the EC signature. Once done i will email you a copy.

My apologies for unforeseen inconveniences that this may have caused.

regards,  
Josafat

**From:** Lima Maartens <[lima@iway.na](mailto:lima@iway.na)>  
**Sent:** Friday, May 6, 2022 9:43:28 AM  
**To:** Saima Angula; damian nchindo2; Josafat hiwana; Damian Nchindo  
**Cc:** 'Johan Van Rooyen'  
**Subject:** RE: Re APP-002733

Dear Saima, Josafat, Damian

I trust that you are all well.

I am just following up re this?

1. The comments from Parks? Josafat?
2. And then the removal of the application (2733) so that we can start from scratch? Damian?  
The Client did submit a letter to the EC?

Any news would be highly appreciated.

Regards  
Lima

**From:** Johan Van Rooyen [johanvr@tgh.na](mailto:johanvr@tgh.na)  
**Sent:** Thursday, April 21, 2022 7:35 AM  
**To:** [Timoteus.Mufeti@met.gov.na](mailto:Timoteus.Mufeti@met.gov.na)  
**Cc:** Saima.Angula@meft.gov.na; damian.nchindo@meft.gov.na; Josafat.Hiwana@meft.gov.na; [lima@iway.na](mailto:lima@iway.na)  
**Subject:** NNDC REQUEST TO HAVE APPLICATION APP-002733 DELETED FROM ONLINE PORTAL

Good day Mr. Mufeti

Attached please find a letter of request to have NNDC's application APP-002733 deleted from the online portal.

Your assistance is highly appreciated.

Yours sincerely

Johan van Rooyen  
NNDC Head Mining Operations and Development

Tel: 0832709826

**From:** Lima Maartens [lima@iway.na](mailto:lima@iway.na)  
**Sent:** Wednesday, April 20, 2022 6:04 PM  
**To:** Saima Angula (Saima.Angula@meft.gov.na) <Saima.Angula@meft.gov.na>; 'damian nchindo2' <damian.nchindo2@meft.gov.na>; Josafat Hiwana (Josafat.Hiwana@meft.gov.na) <Josafat.Hiwana@meft.gov.na>; Damian Nchindo (damian.nchindo@meft.gov.na) [damian.nchindo@meft.gov.na](mailto:damian.nchindo@meft.gov.na)  
**Cc:** 'Johan Van Rooyen' [johanvr@tgh.na](mailto:johanvr@tgh.na)  
**Subject:** RE: Re APP-002733  
**Importance:** High

Dear Saima, Damian

As discussed this afternoon;

Saima, you said you will follow up with Josafat re the comments from Parks (to be submitted to me).

Damian, I shall ask the client (cc into this mail) to write a letter to the Environmental Commissioner asking to delete the Application (and state reasons), so that we can start from scratch.

Regards  
Lima

**From:** Lima Maartens <[lima@iway.na](mailto:lima@iway.na)>  
**Sent:** 11 April 2022 09:12  
**To:** Saima Angula ([Saima.Angula@meft.gov.na](mailto:Saima.Angula@meft.gov.na)) <[Saima.Angula@meft.gov.na](mailto:Saima.Angula@meft.gov.na)>; 'damian nchindo2' <[damian.nchindo2@meft.gov.na](mailto:damian.nchindo2@meft.gov.na)>; Josafat Hiwana ([Josafat.Hiwana@meft.gov.na](mailto:Josafat.Hiwana@meft.gov.na)) <[Josafat.Hiwana@meft.gov.na](mailto:Josafat.Hiwana@meft.gov.na)>; Damian Nchindo ([damian.nchindo@meft.gov.na](mailto:damian.nchindo@meft.gov.na)) <[damian.nchindo@meft.gov.na](mailto:damian.nchindo@meft.gov.na)>  
**Cc:** 'Johan Van Rooyen' <[johanvr@tgh.na](mailto:johanvr@tgh.na)>  
**Subject:** Re APP-002733

Dear Saima

As per telephonic discussion last week;

Damian/Josafat will send me the comments from Parks?

I will then change Form 1, and re-submit to MME and MEFT.

Damian, Saima said I can ask you for a link to upload the updated documents?

We also need to change the e-mail address Username: [lyalooA@tgh.na](mailto:lyalooA@tgh.na) (she left Trustco) to [johanvr@tgh.na](mailto:johanvr@tgh.na) – Damian, can it be done from your side?

Regards

Lima

Dr. Lima Maartenz

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Telephone: +264 61 255750

Mobile: +264 81 2458790

e-mail: [lima@iway.na](mailto:lima@iway.na)

PO Box 1284,

Windhoek, Namibia

## **Annexure C**

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**From:** Ministry of Environment and Tourism [noreply@meft.gov.na](mailto:noreply@meft.gov.na)

**Sent:** Friday, September 8, 2023 7:07 AM

**To:** Lima Maartens [limamaartens@gmail.com](mailto:limamaartens@gmail.com)

**Subject:** Your application is verified



**REPUBLIC OF NAMIBIA**

Ministry of Environment, Forestry & Tourism

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2023-09-08

Dear Lima Maartens,

This email serves to inform you that your application **APP-002077** has been verified

Taking the following into considerations:

- Location of the project
- Pollution potential
- Scale of operation of the project

Please upload the following documents:

- Updated EMP to effect amendment
- Confirmation of screening notice received (through email) in terms of assessment procedures (Section 35 (1)(a)(b) of the Environmental Management Act, No 7 of 2007)
- Preliminary Site Map with coordinates (decimal degrees) and a Legend
- Copy of the previous Environmental Clearance Certificate issued in terms of Section 37(1)(a) of EMA

- CV of Environmental Assessment Practitioner (EAP)

Please login onto our portal to upload required documents, if any  
<https://eia.met.gov.na>

NB- for the purpose of Section 38 of the Environmental Management Act, 2007 read with Regulation 4(d), kindly forward copies of all relevant documents i.e (application forms, EIA, Scoping reports, EMP etc) to the office of the Environmental Commissioner

Thank you

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Phillip Troskie Bulding  
P/Bag 13306, Windhoek | Tel: +264 61 284 2111 | DEA: +264 61 284 2701

Please do not reply directly to this email. It was sent from an unattended mailbox.  
Correspondences can be done on the portal or please use  
[eia@met.gov.na](mailto:eia@met.gov.na)

**From:** Ministry of Environment and Tourism [noreply@mef.gov.na](mailto:noreply@mef.gov.na)  
**Sent:** Tuesday, September 5, 2023 6:14 PM  
**To:** Lima Maartens [limamaartens@gmail.com](mailto:limamaartens@gmail.com)  
**Subject:** New application for an Environmental Clearance Certificate



**REPUBLIC OF NAMIBIA**  
Ministry of Environment, Forestry & Tourism

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2023-09-05

Dear Lima Maartens,

Thank you for applying for an Environmental Clearance Certificate.

Your application has been registered with application number  
**230905002077**

Thank you

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Phillip Troskie Bulding  
P/Bag 13306, Windhoek | Tel: +264 61 284 2111 | DEA: +264 61 284 2701

Please do not reply directly to this email. It was sent from an unattended mailbox.  
Correspondences can be done on the portal or please use  
[eia@met.gov.na](mailto:eia@met.gov.na)