



RED-DUNE CONSULTING CC

**APP: 231005002224**

**Environmental Management Plan for the Proposed  
Exploration Activities of Base and Rare Metals, Dimension  
Stone, Industrial Minerals, Precious Metal On Exclusive  
Prospecting License 8898 at Otjiwarongo District,  
Otjozondjupa Region**



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## DOCUMENT INFORMATION

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<b>CLIENT</b>	Mr. Julius Nyerere Namoloh
<b>PROJECT CONSULTANT</b>	Mr. Ipeinge Mundjulu
<b>LOCATION</b>	Otavi and Otjiwarongo, Otjozondjupa Region
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## **ACRONYMS**

<b>DEA</b>	Department of Environmental Affairs
<b>EA</b>	Environmental Assessment
<b>EAP</b>	Environmental Assessment Practitioner
<b>EC</b>	Environmental Commissioner
<b>ECC</b>	Environmental Clearance Certificate
<b>ECO</b>	Environmental Compliance Officer
<b>EIA</b>	Environmental Impact Assessment
<b>EMA</b>	Environmental Management Act (No. 7 of 2007)
<b>EMP</b>	Environmental Management Plan
<b>EPL</b>	Exclusive Prospecting License
<b>I&amp;APs</b>	Interested and Affected Parties
<b>MET</b>	Ministry of Environment and Tourism
<b>PPE</b>	Personal Protective Equipment
<b>RC</b>	Reverse Circulation
<b>RD</b>	Red-Dune Consulting CC
<b>TORs</b>	Terms of Reference

## **1. Overview**

This Environmental Management Plan (EMP) is developed based on an Environmental Impact Assessment (EIA) for the EPL 8898. A comprehensive project description and impact assessment are contained in the EIA report.

## **2. Purpose of the EMP**

This Environmental Management Plan (EMP) is a risk strategy that contains logical framework, monitoring programme, mitigation measures, and management control strategies to minimize environmental impacts. It further stipulates the roles and responsibility of persons involved in the project. These strategies are developed to reduce the levels of impacts for the projects

## **3. Compliance to the EMP**

This EMP is a legally binding document as given under the provisions of the Environmental Management Act, 2007 (Act No. 7 of 2007). Mr. Julius Nyerere Namoloh and his contractors must adhere to the framework of this document

## **4. Roles and Responsibility**

### **4.1. Proponent**

The proponent, Mr. Julius Nyerere Namoloh shall take overall responsibility for proper implementation of the EMP. It remains the responsibility of the proponent to appoint key personnel for the implementation of the EMP such as Site Manager and ensure that all employees and contractors are conversant with the EMP.

### **4.2. Site Manager**

The Site Manager (SM) represents the proponent on site. He/she shall be responsible for daily activities in ensuring environmental protection. All communication with regard to the implementation of EMP must be channelled through the SM

### **4.3. Employees**

It shall be responsibility of employees to adhere to the provision of EMP at all times when on site

### **4.4. Environmental Compliance Officer**

Compliance to EMP is enforced by the environmental inspector as provided for under Environmental Management Act (No. 7 of 2007) (EMA)

## **5. Disciplinary Action**

This EMP is a legally binding document, non-compliance to the EMP is punishable in accordance to the provision of EMA

## 6. Policy, Legal and Administrative Framework

**Table 1.** Regulatory framework applicable to the project

<b>Legislation</b>	<b>Summary</b>	<b>Applicability to Assessment</b>
<b>The Namibian Constitution</b>	The State shall actively promote and maintain the welfare of the people by adopting policies aimed at ... The maintenance of ecosystems, essential ecological processes and biological diversity of Namibia and utilization of living natural resources on a sustainable basis for the benefit of all Namibians, both present and future	Protection of the environment and biodiversity. Ensures that these principles are enshrined in the EIA documentation
<b>Environmental Management Act No. 7 of 2007</b>	To promote sustainable management of the environment and the use of natural resources and to provides for a process of assessment and control of activities which may have significant effects on the environment; and to provide for incidental matters	The Act provides a list of activities that may not be undertake without an environmental clearance certificate to prevent environmental damages.
<b>Mineral Resource Act, Act 1992.</b>	Prospecting and Mining of Mineral in Namibia and Issuance of all Permits.	Issuance of Mining permits
<b>Draft Pollution Control and Waste Management Bill</b>	This Bill serves to regulate and prevent the discharge of pollutants to air and water as well as providing for general waste management.	To protect the Environment from possible hydrocarbons and oil leaks from the machinery, trucks and vehicles.



<b>Legislation</b>	<b>Summary</b>	<b>Applicability to Assessment</b>
<b>Environmental Policy framework (1995)</b>	This policy subjects all developments and project to environmental assessment and provides guideline for the Environmental Assessment.	Consideration of all possible impacts and incorporate them in the development stages
<b>Regulations Related to the Health and Safety of Employees at Work. Reg No. 156</b>	Promotes the Safety and Health of employees at the work place	To ensure employees health and safety at work
<b>Public Health Act No. 36 of 1919</b>	To Protect the public from nuisance and states that no person shall cause a nuisance or shall suffer to exist on any land or premises owned or occupied by him or of which he is in charge any nuisance or other condition liable to be injurious or dangerous to health.	To ensure that the project is not a nuisance to land owners and the public at large
<b>Labour Act No. 11 of 2007</b>	This Act outlines the labour laws which encompass protection and safety of employees at work.	Fair labour practises to be observed with regard to this act
<b>Water Act No, 54 of 1956</b>	All water resources belong to the State. It prevents pollution and promotes the sustainable utilization of the resource	Prevention of discharging contaminated water at unauthorised places
<b>Soil Conservation Act No. 76 of 1969</b>	To promotes the conservation and compacting of soil erosion	Uncontrolled movement of heavy vehicles and truck at areas surrounding the site may cause land degradation

<b>Legislation</b>	<b>Summary</b>	<b>Applicability to Assessment</b>
<b>Water Resource Management Act No.11 of 2011</b>	The Act stipulates the prevention of pollution for Surface and Ground water sources.	Oil spillage coming from machinery requires proper monitoring.
<b>Public Health Act no. 36 of 1919</b>	The Act gives provision for the protection for the health of all people.	The noise and dust level emanating from the project could affect the surrounding community and vegetation in the vicinity.
<b>National Heritage Act No.27 of 2004</b>	The Act gives provision of the protection and conservation of places and objects with heritage significance.	The chance find of Human Remains due to colonial history or crime, Artefacts, and or heritage materials within the EPL
<b>Minerals (Prospecting and Mining) Act No 33 of 1992</b>	Section 50 (i) requires “an environmental impact assessment indicating the extent of any pollution of the environment before any prospecting operations or mining operations are being carried out and an estimate of any pollution, if any, likely to be caused by such prospecting operations or mining operations”	The proposed activity is prospecting for minerals, hence it requires an EIA to be carried out and adhere to the act’s provisions.

## 7. The EMP table

Project- Environment Interaction	Objectives	Proposed Mitigation Measures	Monitoring program	Party Responsible
<b>Farm access</b>	To avoid conflict between the proponent and Farm Owners	<ol style="list-style-type: none"> <li>1. Prepare an access / entry contract agreement and present it to the farmers for the scrutiny</li> <li>2. Inform farm owner well in advance before your planned activities</li> <li>3. All people entering the farm must carry identification documents</li> <li>4. Do not enter the farm without owner's consent</li> </ol>	Farm access agreement Identification documents Recorded conflict	Site Manager
<b>Induction</b>	To ensure that all employees are familiar with the requirements of the EMP	<ol style="list-style-type: none"> <li>1. All employees must go through an induction course for the provision of the EMP.</li> <li>2. Staff operating specialised equipment and heavy vehicle must be properly trained</li> </ol>	Induction Minutes, report and Attendance Register	Site Manager

Project- Environment Interaction	Objectives	Proposed Mitigation Measures	Monitoring program	Party Responsible
<b>Employment</b>	Although significant employment is not expected, the proponent must abide to the relevant labour laws	<ol style="list-style-type: none"> <li>1. Ensure that all general work is reserved for local people unless in circumstances where specialized skills are required.</li> <li>2. Fair compensation and labor practice as per Namibian Labor Laws must be followed</li> <li>3. Ensure skill transfer to the locals</li> </ol> <ol style="list-style-type: none"> <li>1. Use local supplier for good and service where possible</li> </ol>	<p>Employees records and their nationalities</p> <p>Labour unrest over unfair compensation</p>	Site Manager
<b>HIV/AIDS, Alcohol and Drug abuse</b>	To sensitise employees about the danger of alcohol, drugs and HIV/AIDS	<ol style="list-style-type: none"> <li>1. Provide awareness to the employees on danger of alcohol, (HIV/AIDS) and drug abuse</li> <li>2. Provide Condoms to workers</li> <li>3. Do not bring alcohol on the farm, unless otherwise agreed with the farm owner</li> </ol>	Awareness meeting minutes	Site Manager

Project- Environment Interaction	Objectives	Proposed Mitigation Measures	Monitoring program	Party Responsible
<b>General Safety</b>	To ensure good health and safety for the employees and public	<ol style="list-style-type: none"> <li>1. Abide by the Occupational Health and Safety and Labour Act of Namibia and other statutory requirement such as International Labour Practise (ILO)</li> <li>2. Develop a health and safety plan / policy</li> <li>3. Ensure that every employee went through an induction course about safety;</li> <li>4. Employees must be equipped with all necessary Personal Protective Equipment (PPE). These includes, Helmet, Overall, Safety Shoes, Safety Glasses, Gloves, Earmuff etc;</li> <li>5. During operation, minor accidents are eminent, hence there must be a first aid kit;</li> <li>6. Only qualified and licenced personnel must be allowed to operate machinery and vehicles;</li> <li>7. No employee must be allowed to be onsite without PPE;</li> <li>8. Adequate safety signs must be displayed on site;</li> </ol>	<p>Induction Minutes</p> <p>Valid driver licenses for heavy vehicles</p> <p>Complain of health issues by employees</p> <p>PPE for all employees</p>	Site Manager

Project- Environment Interaction	Objectives	Proposed Mitigation Measures	Monitoring program	Party Responsible
		9. Unauthorised fire shall not be permitted on site		
<b>Health</b>	To ensure good health for the employees	<ol style="list-style-type: none"> <li>1. Employees must NOT be exposed to noise levels above the required -85dB (A) limit over a period of 8 hours.</li> <li>2. Adhere to the Labour act, non-toxic human dust exposure levels may not exceed 5mg/m<sup>3</sup> for respiratory dust and 15mg/m<sup>3</sup> for total dust.</li> <li>3. Supply clean drinking water to the site, such as portable water tank;</li> <li>4. Used mobile toilets</li> <li>5. Ensure that supervisor has gone through occupational health and first aid course,</li> <li>6. Train employee on hazard and risk avoidance</li> <li>7. Provide insect repellent, mosquito nets and if necessary immunization to prevent deadly diseases such as malaria</li> </ol>	<p>Complain from farmers</p> <p>Health complaints from employee and employees fitness certificate</p>	Site Manager

<b>Project-Environment Interaction</b>	<b>Objectives</b>	<b>Proposed Mitigation Measures</b>	<b>Monitoring program</b>	<b>Party Responsible</b>
<b>Visual Impact</b>	To prevent litter / waste scattered all over and preserve aesthetic value	<ol style="list-style-type: none"> <li>1. Maintain good house keeping</li> <li>2. Trenches, access roads , camping places must be rehabilitated and kept clean</li> </ol>	Scattered Litter, Visual inspection	Site Manager
<b>Impact on Flora</b>	To ensure sustainable conservation the vegetation	<ol style="list-style-type: none"> <li>1. Mature trees must be avoided to be cut down</li> <li>2. Do not plant alien trees</li> <li>3. Don not harvest firewood</li> </ol>	Complain and records	Site Manager
<b>Impact on Fauna</b>	To ensure protection of animals especially wild animals	<ol style="list-style-type: none"> <li>1. Do not kill animals if found on site (unless it is an eminent danger to human life)</li> <li>2. There must be ZERO tolerance to poaching</li> <li>3. The food must be stored in the closed place in order not to attract baboons</li> </ol>	Complaints from farmers and record of poaching	Site Manager

<b>Project- Environment Interaction</b>	<b>Objectives</b>	<b>Proposed Mitigation Measures</b>	<b>Monitoring program</b>	<b>Party Responsible</b>
<b>Conservation of Ground Water Resource</b>	To prevent exposure of ground water	1. Ensure that drilled holes are properly closed to prevent ground water exposure unless otherwise as agreed with the farm owner	Rehabilitated drilled sites	Site Manager
<b>Surface and Ground water pollution</b>	To prevent water pollution	<ol style="list-style-type: none"> <li>1. Fueling of heavy vehicle on site must be well coordinated at designated places agreed with the farm owners</li> <li>2. Stationary vehicles must be provided with drip tray to capture oil, lubricants and hydraulic fluids leakages</li> <li>3. All vehicle and machinery must be well service to avoid leakages</li> <li>4. Provide and train on oil spill emergency response</li> <li>5. Servicing of vehicles and machinery must take place at designated sites agreed with the farm owners</li> </ol>	Physical inspection	Site Manager



<b>Project- Environment Interaction</b>	<b>Objectives</b>	<b>Proposed Mitigation Measures</b>	<b>Monitoring program</b>	<b>Party Responsible</b>
<b>Land Degradation</b>	To prevent soil erosion	<ol style="list-style-type: none"> <li>1. Movement of heavy vehicles must be coordinated and restricted to be on access roads</li> <li>2. Normally, farm roads are meant for light vehicles, exploration vehicles have the potential to damage the farm access roads. Hence proper road maintenance must be implemented to ensure that the roads are left on good state</li> </ol>	Physical inspection	Site Manager
<b>Waste Generation</b>	To ensure good housekeeping and prevent littering	<ol style="list-style-type: none"> <li>1. Provide Skip bins to collect waste and be disposed of at an approved disposal site</li> <li>2. Do not burry waste on site</li> <li>3. Excavate a small biodegradable waste site that would be dump filled at the end of the project which must first be agreed with farm owner alternatively, provide</li> </ol>	Waste bins on site Physical inspection	Site Manager

<b>Project- Environment Interaction</b>	<b>Objectives</b>	<b>Proposed Mitigation Measures</b>	<b>Monitoring program</b>	<b>Party Responsible</b>
		<p>mobile toilets that will be disposed at an approved municipal site</p> <p>4. Used oil, grease and lubricants cans must be collected in appropriate drums and disposed of at an approved site.</p>		
<b>Noise Impacts</b>	To prevent noise pollution from flying aircraft	<ol style="list-style-type: none"> <li>1. The aircraft must fly at heights which may not cause noise nuisance to animals</li> <li>2. A fixed wing air craft is recommended than a helicopter</li> <li>3. Confirm flying schedules with farmers, whose operation is tourism related</li> </ol>	Complaints from farmers and members of public	Site Manager
<b>Traffic</b>	To ensure coordinated movement of heavy vehicles	<ol style="list-style-type: none"> <li>1. Trucks must be installed with a rotating headlight beam lights</li> </ol>	Records of public complain Visible warning signs	Site Manager

<b>Project- Environment Interaction</b>	<b>Objectives</b>	<b>Proposed Mitigation Measures</b>	<b>Monitoring program</b>	<b>Party Responsible</b>
		<ol style="list-style-type: none"> <li>2. Truck must maintain a low speed to prevent excessive dust and accident</li> <li>3. The roads must be maintained by scrapping and compacting</li> <li>4. Install warning signs where necessary</li> </ol>		
<b>Oil Leakages</b>	Manage fuels, oils and lubricants leakages from Vehicles and Machinery to prevent pollution	<ol style="list-style-type: none"> <li>1. Ensure all vehicle are well service and leak inspection are done;</li> <li>2. Provide drip trays to stationary vehicle</li> <li>3. Servicing of vehicle must be done at an approved site or at areas agreed with the farm owner.</li> <li>4. Re-fuelling, oil replacement must be done on approved sites;</li> </ol>	Physical verification and routine monitoring	Management or Site Manager
<b>Archaeology Heritage Resources Artefacts</b> /	Preserve Heritage	<ol style="list-style-type: none"> <li>1. Employee must be trained on the possible find of heritage and archaeological material in the area;</li> <li>2. Implement a chance find and steps to be taken for heritage or archaeological material finding</li> </ol>	Sighting report/s of heritage resources / artefacts	Management or Site Manager

Project- Environment Interaction	Objectives	Proposed Mitigation Measures	Monitoring program	Party Responsible
		<p>(Heritage (rock painting and drawings), human remains or artefacts) are unearthed</p> <p>Stopping the activity immediately</p> <ul style="list-style-type: none"> <li>i. Informing the operational manager or supervisor</li> <li>ii. Cordoned of the area with a danger tape and manager to take appropriated pictures.</li> <li>iii. Manager/supervisor must report the finding to the competent authorities National Heritage Council of Namibia ( 061 244 375) National Museum (+264 61 276800) or the National Forensic Laboratory (+264 61 240461).</li> </ul>		



## 8. Closure / Decommissioning Plan

During exploration, evasive processes includes trenching and drilling. Trenching is normally done by hand, the trenches are not deep and they are immediately rehabilitated after sampling. Drilling may necessitate the establishment of access roads to targets site, hence these must be rehabilitated immediately. After geochemical sampling with the drill, the casing must be removed and the drill hole must be properly covered, unless otherwise agreed with the farmers to leave the casing for purpose of making water borehole (Figure 1).



**Figure 1** RC drill hole are after rehabilitation (Photo for illustration purpose)

## **9. Conclusions and Recommendations**

### **9.1. Conclusion**

Exploration activities are not known to cause harm to the environment due to their non-physical nature. In Namibia, farms are heavily encroached with thick bushes, hence access roads to generated targets are in a way advantageous to the farmers as long as the line cutting avoids mature and protected trees. It is important for the proponent to establish good relation with farm owner to ensure environmental protection. Should this exploration yield into the potential of establishing a mine, a comprehensive EIA must be undertaken which shall include all necessary specialist studies.

### **9.2. Recommendations**

It is recommended to the approving authority that this project is approved and be issued with an Environmental Clearance Certificate with following condition;

- Bi-annual report for environmental monitoring must undertaken

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