

Environmental Audit Report for the Renewal of Mining License (ML) No. 213 and 214 on Okawayo Farm 46 in the Karibib District, Erongo Region.

Audit Period: September 2019 – December 2020

Author(s): Ms. Althea Brandt Reviewer: Ms.	Client: Africa Big Lion Mining (Pty) Ltd
Rose Mtuleni	Contact person: Ben Xu
Company: Excel Dynamic Solutions (Pty)	Telephone: +264 81 659 1858
Ltd	Postal Address: P.O Box 3570, Windhoek,
Telephone: +264 (0) 61 259 530	Namibia
Fax2email: +264 (0) 886 560 836	Email: ben@mingjie.es
Email: info@edsnamibia.com	

December 2020

TABLE OF CONTENTS

LIS	T OF	FIGURES	ii
LIS	T OF	TABLES	ii
1	INT	RODUCTION	3
	1.1	Project Background	3
	1.2	Purpose of the Environmental Compliance (Audit) Report	5
	1.3	Appointed Environmental Assessment Practitioner and Auditors	6
	1.4	Environmental Auditing	6
	1.5	Details of the Project Proponent	6
2	EM	P ROLES AND RESPONSIBILITIES	7
2	.1	Environmental Management Plan Actions and Audit	7
2	.2	Key Potential Environmental Impacts to be managed	7
2	.3	Phase 1: Operation (and Maintenance) Phase Management Action Plans	8
2	.4	Phase 2: Monitoring Phase Management Action Plans	17
3	SUN	MMARY OF COMPLIANCE	24
4	COI	NCLUSION AND RECOMMENDATIONS	24
5	PHC	DTOS	26

LIST OF FIGURES

Figure 1: Location of the mining license ML 213 and 214 near Karibib Town, Erongo Region	n 4
Figure 2: A waste container at a waste collection site on the mine	26
Figure 3: Undisturbed vegetation on the site	27
Figure 4: The mine workers wearing Personal Protective Equipment	27
Figure 5: Figure 5: Security gate and security guard room	28
Figure 6: Speed limit (20km/h) sign mounted on the mine area fence	28
Figure 7: Store room, emergency contact details, and firefighting equipment	29
Figure 8: Water tanks and diesel powered generator	29

LIST OF TABLES

Table 1: Proponent contact details and purpose of the ECC	. 6
Table 2: Summary of key potential environmental impacts per project phase	. 7
Table 3: Management action plans for the Operation and Maintenance Phase and EMP Audit	. 8
Table 4: Management action plans for the Monitoring Phase and EMP Audit	17

1 INTRODUCTION

1.1 Project Background

This bi-annual audit report is prepared on behalf of Africa Big Lion Mining (Pty) Ltd (new Mining Licenses Owner), has been extracting dimension stones (Marble) on Mining License No 213 (previously owned by Mr Sydney Huberth Goagoseb) and Mining License No 214 (previously owned by Mr Samorna Brain Kangura Mudumbi) since mid-2019. The licenses are located northeast of Karibib Town in the Erongo Region, and the share boundaries. The report provides a summary of the environmental performance since the granting of the Environmental Clearance Certificate on 12 June 2019. The location of the Mining Licenses (ML 213 & 214) is shown in **Figure**



Figure 1: Location of the mining license ML 213 and 214 near Karibib Town, Erongo Region

1.2 **Purpose of the Environmental Compliance (Audit) Report**

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

The compilation of this Environmental Audit Report was one of the requirements (scope of work) presented to Excel Dynamic Solutions (Pty) Ltd by the ML213 Owner, to ensure environmental compliance with reference to the Environmental Management Plan (EMP), which has been prepared as a legal requirement by Section 8 of the Environmental Management Act (EMA), No. 7 of 2007 and its 2012 Environmental Impact Assessment (EIA).

This Environmental Audit Report serves to document the progress made on the extracting works of ML 213 and 214. The phases of the renewal of the extraction of Marble activities are summarized below:

- Operation and maintenance This is the phase during which the operation of Africa Big Lion Mining Pty Ltd is extracting Marble from the mining pit and undertaking related activities on site. It is also the phase during which maintenance of the mining pit, equipment and machinery is done by company and its contractors.
- Environmental Monitoring Requirements In order to support and ensure that the proposed mitigation measures are achieving the desired results, a monitoring plan was implemented alongside the mitigation plan.
- Decommissioning and Rehabilitation This is the phase during which the quality marble rocks will eventually run out at the site leading to the cessation of mining. The decommissioning of the mining operations may also be considered due to declining in the dimension stones prices (below profitable margins) and low demand. During the operational phase and before decommissioning, the Proponent will need to put site rehabilitation measures in place.

It is expected from Africa Big Lion Mining Pty Ltd and its employees and/or contractors in guiding them during the mining operations to ensure that impacts on the environment, are avoided or limited if they cannot be avoided completely.

1.3 Appointed Environmental Assessment Practitioner and Auditors

The Proponent appointed EnvironClim Consulting Services CC in 2019s to conduct the required Environmental Assessment process and prepare a detailed Environmental Management Plan that can be used as guide to monitor compliance to the recommendations made in the EIA; and thereafter, submit the Environmental Clearance Certificate (ECC) application to the Ministry of Environment, Forestry and Tourism and Ministry of Mines and Energy on their behalf.

Excel Dynamic Solutions (Pty) Ltd has been appointed as the external Environmental Control Officer (ECO) and Auditor to ensure EMP compliance throughout the project life cycle, with the conditions of authorization, in performing environmental monitoring and auditing, in order to produce the subsequent bi-annual environmental compliance reports.

This document was compiled by Ms. Althea Brandt and Ms. Rose Mtuleni. The final document review is done by Mr. Nerson Tjelos.

1.4 Environmental Auditing

The current baseline is expected to be reviewed and progress inspected according to the EMP and therefore a bi-annual compliance report is a requisite part of environmental monitoring. Extraction activity has commenced after obtaining the ECC for the conversion of Mining Claim 70385 into Mining Licence 213, resulting in the project area to be in an altered state. Site inspection is done as part of this submission.

1.5 **Details of the Project Proponent**

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

Full name of Physical Address & Contact		Postal Address	ECC granted for:
Proponent number			
Africa Big	Okawayo Farm 46, Karibib,	P. O. Box 3570,	Conversion for conversion Mining Claim
Lion Mining	Karibib District	Windhoek, Namibia	No 70385 into Mining License No 213 and
Pty Ltd	Tell: +264 81 659 1858		Associated Activities on Okawayo Farm 46 northeast of Karibib Town in Karibib
			District in the Erongo Region

Table 1: Proponent contact details and purpose of the ECC

2 EMP ROLES AND RESPONSIBILITIES

As the ML holder, Africa Big Lion Mining Pty Ltd is ultimately responsible for the implementation of the EMP, and has delegated the responsibility for the effective implementation of the EMP to Excel Dynamic Solutions (Pty) Ltd.

2.1 Environmental Management Plan Actions and Audit

The aim of the management actions of the EMP is to avoid potential negative impacts where possible. Where impacts cannot be avoided, measures are provided to reduce the significance of these impacts. It is therefore important for the Proponent/Environmental Manager to be sure to adhere to the management actions.

Management actions recommended for the potential impacts rated in the EIA carried out for the prospecting and exploration activities were based on the three project phases listed below:

- Phase 1: Operation and Maintenance (surveys, drilling, quarrying, hauling...) (Table 3)
- Phase 2: Monitoring (Table 4)
- Phase 3: Decommissioning and Rehabilitation

The responsible persons at Africa Big Lion Mining Pty Ltd should assess these commitments in detail and should acknowledge their commitment to the specific management actions detailed in the phases given under the following subchapters. The compliance thereof are also measured in **Tables 3** and **4**.

2.2 Key Potential Environmental Impacts to be managed

From the EIA conducted, the following key potential negative impacts have been identified per project phase and are summarized in **Table 2** below.

	Potential negative impacts identified in the EA
1	Health and safety, visual, waste, noise
2	The monitoring of mining operation impacts in remote locations can be problematic due to difficulties of access
3	Loss of employment by workers, and contribution to the national economy

Table 2: Summary of key potential environmental impacts per project phase

2.3 **Phase 1: Operation (and Maintenance) Phase Management Action Plans**

The management action plans recommended for this phase are presented in **Table 3** below.

Environmental Feature	Management Actions	Observations	Compliance comment	Corrective Action/Recommendation
EMP training	 Employees appointed for operation and maintenance on respective site must ensure that all personnel are aware of necessary health, safety and environmental considerations applicable to their respective works. 	Employees have been made aware.	COMPLIANT	N/A
Monitoring	• The ECO or the Proponent should monitor the implementation of this EMP.	Undertaken on a weekly bases.	COMPLIANT	N/A
	 An EMP non-compliance penalty system should be implemented on site. 	No penalty system in place.	NON-COMPLIANT	Implement a non- compliance penalty system based on the environmental features identified in this EMP Audit.

Table 3: Management action plans for the Operation and Maintenance Phase and EMP Audit

Environmental Feature	Management Actions	Observations	Compliance comment	Corrective Action/Recommendation
Visual (sense	• All the necessary options to improve the	The site is kept tidy	COMPLIANT	N/A
of place)	aesthetic of the site should be considered and	and shows		
	incorporated in the mining activities.	consideration of the		
		natural aesthetic of		
		the site, particularly		
		preservation of		
		surrounding		
		vegetation.		
Biodiversity	• Vegetation found on the site, but not in the	No vegetation has	COMPLIANT	N/A
	targeted mining areas should not be removed,	been removed from		
	but left to preserve biodiversity on the site.	site.		
	• Even if a certain shrub or tree is found along	All staff are made	COMPLIANT	N/A
	mining spots on sites, this does not mean that	aware		
	it should be removed. Therefore, care should			
	be taken when extracting mineral species			
	without destroying the vegetation.			
	• Workers should refrain from killing or snaring	All staff are made	COMPLIANT	N/A
	animals' species (big or small) that may be	aware		
	found on the site.			

Environmental Feature	Management Actions	Observations	Compliance comment	Corrective Action/Recommendation
	Environmental awareness on the importance of	Not separately	COMPLIANT	N/A
	biodiversity preservation should be provided to	implemented, but		
	the workers	addressed through		
		the two measures		
		above, on protection		
		of animals and		
		vegetation.		
Employment	Preference for workers during operational	Local workers	COMPLIANT	N/A
	phase should be given to Karibib's locals.	employed.		
	No recruitment should be done on site.	All vacancies are	COMPLIANT	N/A
		sourced locally face		
		to face. There is no		
		recruitment on site as		
		members of the		
		public are not allowed		
		anywhere near the		
		mining area.		
Air Quality	Mining schedule should be limited to weekdays	These stated work	COMPLIANT	N/A
	only and between 08h00 and 17h00. This will	hours are adhered to.		
	keep the vehicle-related dust level minimal in			
	the area.			

Environmental Feature	Management Actions	Observations	Compliance comment	Corrective Action/Recommendation
	• Since the project site is in an area where, due	Water is kept on site	COMPLIANT	N/A
	to little vegetation cover, soils are exposed, it is	for this purpose.		
	highly probable that more dust will be			
	generated from mining (excavating). It is			
	therefore advisable that in extremely windy			
	days, a reasonable amount of water should be			
	used to suppress the dust that may be			
	emanating from certain mining areas on the			
	site.			
Waste	• Workers should be sensitised to dispose of	Waste is collected	COMPLIANT	N/A
Generation	waste in a responsible manner and not to litter.	and then removed		
		from the site once a		
		week, taken to the		
		Karibib dump site.		
	After each daily works, the Proponent should	The mine manager	COMPLIANT	N/A
	ensure that there are no waste left at the mining	inspects the site for		
	pit and the work site.	waste after the		
		workers have left.		
	All domestic and general operational waste	Waste is collected	COMPLIANT	The Proponent need to
	produced on a daily basis should be contained	and contained on site		add containers to cater for
	until such that time it will be transported to	until it can be		different types of waste.
	designated waste sites.	disposed of.		

Management Actions	Observations	Compliance comment	Corrective Action/Recommendation
No waste may be buried or burned on site or	Waste is stored on	COMPLIANT	N/A
anywhere else.	site and removed for		
	disposal once a		
	week.		
The mining site should be equipped with	There is no	COMPLIANT	N/A
separate waste bins for hazardous and general	hazardous waste		
waste/domestic.	used or generated on		
	site.		
A penalty system for irresponsible disposal of	Workers have been	PARTIALLY	Implement a penalty
waste on site and anywhere in the area should	notified of the	COMPLIANT	system for irresponsible
be implemented.	precautions,		waste disposal on site and
	however, no penalty		surrounding areas.
	system is in place yet.		
As part of their induction, the workers should be	Implemented.	COMPLIANT	N/A
provided with an awareness training of the risks	Training is provided		
of mishandling equipment and materials on site.	for all new recruits.		
• When working on site, employees should be	The required PPE is	COMPLIANT	N/A
properly equipped with personal protective	provided to workers.		
equipment (PPE) such as coveralls, masks,			
gloves, safety boots, earplugs, safety glasses,			
etc.			
	 No waste may be buried or burned on site or anywhere else. The mining site should be equipped with separate waste bins for hazardous and general waste/domestic. A penalty system for irresponsible disposal of waste on site and anywhere in the area should be implemented. As part of their induction, the workers should be provided with an awareness training of the risks of mishandling equipment and materials on site. When working on site, employees should be properly equipped with personal protective equipment (PPE) such as coveralls, masks, gloves, safety boots, earplugs, safety glasses, 	 No waste may be buried or burned on site or anywhere else. The mining site should be equipped with separate waste bins for hazardous and general waste/domestic. A penalty system for irresponsible disposal of waste on site and anywhere in the area should be implemented. A penalty system for irresponsible disposal of waste on site and anywhere in the area should be implemented. As part of their induction, the workers should be provided with an awareness training of the risks of mishandling equipment and materials on site. When working on site, employees should be properly equipped with personal protective equipment (PPE) such as coveralls, masks, gloves, safety boots, earplugs, safety glasses, 	 No waste may be buried or burned on site or anywhere else. The mining site should be equipped with separate waste bins for hazardous and generat waste/domestic. A penalty system for irresponsible disposal of waste on site and anywhere in the area should be implemented. As part of their induction, the workers should be provided with an awareness training of the risks of mishandling equipment and materials on site. When working on site, employees should be properly equipped with personal protective equipment (PPE) such as coveralls, masks, gloves, safety boots, earplugs, safety glasses,

Environmental Feature	Management Actions	Observations	Compliance comment	Corrective Action/Recommendation
	No employee should be allowed to drink alcohol	Regular inspection	COMPLIANT	N/A
	prior to and during working hours as this may	occurs on site.		
	lead to mishandling of equipment which results			
	into injuries and other health and safety risks.			
	• Employees should not be allowed on site if	Employees found	COMPLIANT	N/A
	under the influence of alcohol.	under the influence of		
		alcohol are sent		
		home immediately		
		and given a written		
		warning.		
Noise	• The mining operational times should be set	No mining is	COMPLIANT	N/A
	such that, no activity is carried out during the	undertaken at night.		
	night or very early in the mornings.	Employees arrive at		
		the mine to begin		
		work at 08:00 each		
		morning on week		
		days.		

Environmental Feature	Management Actions	Observations	Compliance comment	Corrective Action/Recommendation
	Mining hours should be restricted to between	No mining is	COMPLIANT	N/A
	08h00 and 17h00 to avoid noise generated by	undertaken at night.		
	mining equipment and the movement of	Employees arrive at		
	vehicles before or after hours.	the mine to begin		
		work at 08:00 each		
		morning on week		
		days.		
	When operating the drilling and mining	Workers are provided	COMPLIANT	N/A
	machinery onsite, workers should be equipped	with the correct PPE		
	with personal protective equipment (PPE) such	required.		
	as earplugs to reduce noise exposure			
Soils	Spill control preventative measures should be	There is no	COMPLIANT	N/A
	put in place to manage soil contamination, no	hazardous		
	matter how small the amount of pollution (spill)	liquids/waste used on		
	is.	this site. Minor fuel/oil		
		spills are attended to		
		immediately.		
	• Site soils should not be disturbed, if not needed	Only the related site	COMPLIANT	N/A
	or related to the actual mining works.	area is worked on.		
	Overburden material should be handled more	Overburden material	COMPLIANT	N/A
	efficiently during mining operations to avoid	handled efficiently		
	erosion when subjected erosional processes.			

Environmental Feature	Management Actions	Observations	Compliance comment	Corrective Action/Recommendation
	 Prevent the creation of huge piles of waste materials by performing sequential backfilling where possible 	Backfilling is undertaken.	COMPLIANT	N/A
Archaeology and cultural heritage	 Caution should be exercised when carrying out excavations associated with the mining activities in the event that archaeological/heritage remains are discovered. 	There are no archaeological sites in this area. The company is aware of action to take if any archaeological material is discovered on site.	COMPLIANT	N/A
	 The worksite/mining manager should familiarise themselves with the National Heritage Council's regulations 	No information on Heritage Council regulations available on site	NON-COMPLIANT	Information should be obtained from the Heritage Council for the employees to familiarize themselves with.
Communication	 The Proponent should appoint a Public Relation Officer (PRO) to liaise with the farmers/landowners. 	Mining site is only on one farm and good relations with the farm owner are maintained.	COMPLIANT	N/A

Environmental Feature	Management Actions	Observations	Compliance comment	Corrective Action/Recommendation
	 The PRO should be introduced to the neighbors to the site and his or her contact details provided to them prior to undertaking activities for easy communication during the mining activities. 	N/A	N/A	N/A
	 The Proponent should compile a clear communication procedure/plan which should include a grievance mechanism for employees. 	No communication procedures and/grievance mechanism are in place	NON-COMPLIANT	Implementacommunicationprocedure/grievancemechanismforhumanresourceswithinthecompany.
HIV and AIDS (Other STIs) + COVID-19	 The workers should be engaged in health talks and training about the dangers of engaging in unprotected sexual relations which results in contracting HIV/AIDS and other sexual related infections. 	Does not occur yet.	NON-COMPLIANT	Brochures/pamphlets should be obtained from the local clinic for the employees.
	 Provision of condoms and sex education through distribution of pamphlets. These pamphlets can be obtained from local health facilities. 	Does not occur yet.	NON-COMPLIANT	Sex education Brochures/pamphlets and condoms should be obtained from the local clinic for the employees.

Environmental Feature	Management Actions	Observations	Compliance comment	Corrective Action/Recommendation
	 Observation of social distancing, provision of health education on the novel Coronavirus and regular distribution of masks and hand sanitizer on site. 	Observed.	COMPLIANT	N/A

2.4 Phase 2: Monitoring Phase Management Action Plans

In order to support and ensure that the mitigation measures are achieving the desired results, a monitoring plan must be

implemented. The management action plans recommended for mining operations are presented in **Table 4** below.

Environmental Feature	Management Actions/Monitoring Objectives	Frequency (Effective upon commencem ent of operations)	Observation	Compliance	Recommen ded Action
Soils	All measures should be	Weekly	Areas that are not	COMPLIANT	N/A
	considered to prevent the loss of		part of the		
	top soil.		mining/extraction		
			process area remain		
			undisturbed.		

Table 4: Management action plans for the Monitoring Phase and EMP Audit

Environmental Feature	Management Actions/Monitoring Objectives	Frequency (Effective upon commencem ent of operations)	Observation	Compliance	Recommen ded Action
Monitoring	The ECO or the Proponent/Contractor should monitor the implementation of the EMP to ensure compliance.	Daily	Regular monitoring (daily and weekly) occurs, and is audited bi-annually by consultant	COMPLIANT	N/A
	The ECO(s) should inspect the site throughout the mining period and after completion.	Daily	Environmental audits occur bi-annually and will continue until rehabilitation and closure phase of mine.	COMPLIANT	N/A
Biodiversity	 Clear only footprint areas to maintain as much of the remaining natural vegetation on site and to prevent loss of habitat outside areas of interest. 	Weekly	There is not much vegetation in the area.	COMPLIANT	N/A
	 No equipment should be left leaning on or on top of the site shrubs or trees during and after mining work. 	Weekly	No vegetation within the mining area.	COMPLIANT	N/A

Environment Feature	tal	Management Actions/Monitoring Objectives	Frequency (Effective upon commencem ent of operations)	Observation	Compliance	Recommen ded Action
Health a	nd	Mining workers should be trained	Daily/Weekly	Training undertaken.	COMPLIANT	N/A
Safety		on how to handle materials and				
		equipment on site (if they do not				
		already know how to) in order to				
		avoid injuries.				
		• Mining equipment and materials	Daily/Weekly	Equipment is	COMPLIANT	N/A
		transported to site should be		secured to the back		
		securely fastened to the vehicles		of the mine vehicle		
		(trucks and cars). This is to		securely when		
		ensure that the materials and		transporting to and		
		equipment do not fall off the		from the mine.		
		vehicles and cause injuries to				
		anyone while transporting them.				

Environmental Feature	Management Actions/Monitoring Objectives	Frequency (Effective upon commencem ent of operations)	Observation	Compliance	Recommen ded Action
	The proponent and ECO/SHE	Daily/Weekly	Staff are provided	COMPLIANT	N/A
	Officer should ensure that all		with the required		
	personnel are provided with		PPE for mining		
	appropriate personal protective		operations.		
	equipment (PPE), such as				
	gloves, masks, safety boots,				
	safety glasses and hard hats at				
	all times during mining				
	(operation) hours on site to				
	prevent serious injuries or loss of				
	life.				
	No employee should be allowed	Daily/Weekly	Noted – Monitored	COMPLIANT	N/A
	to drink alcohol prior to and		regulalrly.		
	during working hours as this may				
	lead to mishandling of equipment				

which results into injuries and other health and safety risks.

Environmental Feature	Management Actions/Monitoring Objectives	Frequency (Effective upon commencem ent of operations)	Observation	Compliance	Recommen ded Action
Neighbours to the site	 Mining works schedule should be limited to normal working hours, between 08h00 and 17h00. This is to ensure generated noise does not disturb residents during home hours. 	Weekly	The working hours are adhered to.	COMPLIANT	N/A
Waste	 The mining site should be kept tidy at all times. 	Daily	Any waste left by the workers is put into a drum on site.	COMPLIANT	N/A
	 All domestic and general construction waste produced on a daily basis should be cleaned and contained daily to prevent environmental pollution. 	Daily	Any waste left by the workers is put into a drum on site	COMPLIANT	N/A
	 Separate waste containers (bins) for hazardous and domestic / general waste must be provided on site to avoid mixing of waste. 	Daily	No hazardous waste is used or generated on site.	COMPLIANT	N/A

Environmental Feature	Management Actions/Monitoring Objectives	Frequency (Effective upon commencem ent of operations)	Observation	Compliance	Recommen ded Action
Transport	 Mining project workers will be transported, in an SUV/ bus (or similar suitable passenger vehicle) to and from site prevent inhaling of dust. 	Daily	Workers are transported in bakkies. However, the distance to Karibib town where they stay is short (less than 10km), and the driving speed does not exceed 80km/hr	NON- COMPLIANT	The Proponent must consider transportatio n alternatives that provide safety, and dust protection to workers
Vehicular traffic safety	 All drivers of the project vehicles should be in possession of valid and appropriate driving licenses to operate such vehicles. 	Weekly	Copies of valid driving licenses are on file.	COMPLIANT	N/A

Environmental Feature	Management Actions/Monitoring Objectives	Frequency (Effective upon commencem ent of operations)	Observation	Compliance	Recommen ded Action
	 Project vehicles should be in a road worthy condition and serviced regularly in order to avoid accidents as a result of mechanical faults of vehicles. 	Weekly	Service undertaken as and when needed.	COMPLIANT	N/A
	 Vehicles drivers should not be allowed to operate vehicles while under the influence of alcohol. 	Weekly	Monitored regularly.	COMPLIANT	N/A
	 No heavy trucks or project related vehicles should be parked next to the residents' properties or obstruct the local traffic in any way. 	Weekly	All mine vehicles and equipment are parked at the mining site and only used on site.	COMPLIANT	N/A

3 SUMMARY OF COMPLIANCE

This environmental audit has identified 35 management actions and 18 monitoring actions. After onsite observation, 6 out of the 35 management actions have been identified as **Non-***compliant*, and one identified as **Partially Compliant**. 28 of the management actions were observed as **Compliant**. All 18 monitoring actions were identified as **Compliant**. Due to the large proportion of Compliant action recorded for the environmental audit, the general state of the ongoing Operations and Maintenance phase of the project is considered as **Compliant**. It is apparent that Africa Big Lion Mining Pty Ltd has been cautious and have paid attention to the environmental aspects and compliance of this project. There were no serious issues of Non-Compliance identified during this Environmental Audit.

This environmental audit has identified four Non-compliance issues, which have thus far had little to no significant negative effects to the mining operations, the employees and the environment; and are, therefore, regarded as minor non-compliances. The non-compliance issues identified are:

- 1. There is no penalty system for waste disposal and general EMP non-compliance in place
- 2. There is no information and/or awareness on regulations of the National Heritage Council regarding protection of archeological material.
- 3. There are no communication procedures and grievance mechanisms in place for employees.
- 4. There are no health and sex education engagements for the employees on site.
- 5. There are no waste bins to collect different types of waste (i.e., different colours for recycling purpose)

4 CONCLUSION AND RECOMMENDATIONS

The minor non-compliances identified in this biannual environmental audit report need immediate corrective action in order for the mining operations of Africa Big Lion Mining Pty Ltd to reach a 100% Compliance rate. Recommendations for corrective action are as follows:

- Implement a penalty system for EMP Compliance to enforce accountability towards environmental management within mining operations
- Obtain information from the National Heritage Council to familiarize employees with procedures and action to take in the case of discovery of archeological material on site.

- Implement a communication procedure/grievance mechanism for human resources within the company.
- Informative COVID-19 and Sex education Brochures/pamphlets should be created or sourced for health awareness amongst employees. Condoms and protective facial masks should be obtained from the local clinic for the employees.
- Procure different coloured waste bins and make sure they are labeled e.g., organic, papers, mixed etc.

The potential positive and negative impacts stemming from the mining activities were identified, assessed and mitigation measures made thereof. Mitigation measures need to be adhered to ta all times. Most importantly, monitoring of the environmental components described in the Environmental Management Plan should be conducted by the Proponent and an appointed Environmental Health Officer or any applicable Competent Authority.

The next site inspection will be undertaken in **March 2021**, and a resultant biannual report will be produced thereafter.

5 PHOTOS



Figure 2: A waste container at a waste collection site on the mine



Figure 3: Undisturbed vegetation on the site



Figure 4: The mine workers wearing Personal Protective Equipment



Figure 5: Figure 5: Security gate and security guard room



Figure 6: Speed limit (20km/h) sign mounted on the mine area fence



Figure 7: Store room, emergency contact details, and firefighting equipment



Figure 8: Water tanks and diesel-powered generator