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ENVIRONMENTAL COMPLIANCE REPORT FOR EPL 6521

RENEWAL ENVIRONMENTAL CLEARANCE CERTIFICATE

PREPARED FOR:



MARCH 2021

TITLE AND APPROVAL PAGE

Project Name:	Environmental compliance report for EPL 6521 in Otjozondjupa Region, Namibia.
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TABLE OF CONTENTS

1	INTRODUCTION	5
1.1	PROJECT INTRODUCTION	5
1.2	PURPOSE OF THE REPORT	6
1.3	PROPOSED RENEWAL AND ACTIVITIES.....	6
1.4	ENVIRONMENTAL COMPLIANCE CONSULTANCY	6
1.5	THE PROPONENT DETAILS	6
2	ENVIRONMENTAL COMPLIANCE AUDIT	8
2.1	SITE INSPECTION.....	8
2.2	BI-ANNUAL COMPLIANCE AUDIT	8
2.3	DEMONSTRATION OF PROACTIVE AND BEST PRACTICE ENVIRONMENTAL MANAGEMENT	9
2.4	COMPLIANCE AUDIT FINDINGS	9
3	CONCLUSION AND RECOMMENDATIONS	25
3.1	NEXT STEPS	25
	APPENDIX A – ENVIRONMENTAL CLEARANCE CERTIFICATE TO BE RENEWED	26
	APPENDIX B – BIANNUAL AND QUARTELY REPORTS	27
	APPENDIX C – GEOTECHNICAL REPORT	28
	APPENDIX D – PREVIOUSLY APPROVED EIA AND EMP	29

LIST OF FIGURES

FIGURE 1 - MAP INDICATING THE LOCATION OF EPL 6521.....	7
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LIST OF TABLES

TABLE 1 – THE PROPONENT DETAILS.....	6
TABLE 2 - ENVIRONMENTAL MITIGATION MEASURES AND COMMITMENTS – GEOPHYSICS.....	10
TABLE 3 - ENVIRONMENTAL MITIGATION MEASURES AND COMMITMENTS – RECONNAISSANCE GEOCHEMICAL SOIL SAMPLING	13
TABLE 4 - ENVIRONMENTAL MITIGATION MEASURES AND COMMITMENTS – DRILL SITE ESTABLISHMENT...	14
TABLE 5 -ENVIRONMENTAL MITIGATION MEASURES AND COMMITMENTS – DRILLING	17
TABLE 6 - ENVIRONMENTAL MITIGATION MEASURES AND COMMITMENTS- SOCIAL ISSUES & TRAINING	21
TABLE 7 - ENVIRONMENTAL MITIGATION MEASURES AND COMMITMENTS – CLOSURE AND REHABILITATION	22

DEFINITIONS AND ABBREVIATIONS

ABBREVIATIONS	DESCRIPTION
ATM	Audio-Magneto telluric
ECC	Environmental Compliance Consultancy
EMA	Environmental Management Act
EMP	Environmental Management Plan
EPL	Exclusive Prospecting Licence
ESR	Environmental Scoping Report
IP	Induced Polarization
MEFT	Ministry of Environment Forestry and Tourism
MME	Ministry of Mines and Energy

1 INTRODUCTION

1.1 PROJECT INTRODUCTION

Votorantim Metals Namibia (Pty) Ltd (Votorantim) is a wholly owned subsidiary of Votorantim Metais Zinco, a Brazilian mining company, specialising in zinc, lead and copper. In Namibia, the Ministry of Mines and Energy (MME) has a mandate to allow mineral resources exploration. MME issues Exclusive Prospecting Licences (EPLs) to various entities for minerals exploration within Namibia. Votorantim has successfully obtained EPL 6521 on 22nd of August 2017, subject to a term of three years from 9th of August 2017 until 8th August 2020. The EPL was renewed in November 2020 and currently covers an area of approximately 18 243.44 hectares in the Western side of Otavi town in the Otjozondjupa Region, Namibia (Figure 1). Votorantim proposed to undertake exploration activities for base and rare metals, industrial minerals and, precious metals within the EPL.

The project fell within the schedule of listed activities that required environmental clearance in terms of the Environmental Management Act No. 7 of 2007. An Environmental Scoping Report (ESR) and Environmental Management Plan (EMP) compiled by SLR Environmental Consulting were submitted to Ministry of Environment Forestry and Tourism (MEFT) in December 2017 to support the application of an environmental clearance certificate (Appendix D). The project was granted an environmental approval by the Department of Environmental Affairs (DEA) valid for a period of three (3) years on the 22nd of March 2018 (Appendix A).

The following is the summary of the activities relating to the exploration programme within EPL 6521 since March 2018:

- Geological field mapping;
- Ground and air geophysical surveys;
- Soil sampling; and
- Drilling to obtain core samples.

In terms of the Environmental Management Act, No. 7 of 2007 a renewal application for the project's environmental clearance certificate is required. As part of this application, an environmental compliance review of the works undertaken on site and compliance with the EMP is to be submitted to the MEFT.

Minerals exploration within EPL 6521 has commenced in 2018, therefore renewal of this environmental clearance certificate should be granted. Due to the fact that exploration has commenced the requirement to renew the environmental clearance certificate seems futile.

1.2 PURPOSE OF THE REPORT

The purpose of this report is to present the findings of an environmental compliance audit for the activities that have occurred within the boundaries of EPL 6521 over the reporting period (March 2018 to March 2021). This report accompanies the renewal application for the environmental clearance certificate, submitted to the MEFT. The commitments contained in the approved Environmental Management Plan (EMP) in terms of the Environmental Management Act, No. 7 of 2007 have been used for the audit, which is included in Chapter 2.

1.3 PROPOSED RENEWAL AND ACTIVITIES

There are no new proposed activities for the project that should be considered for this environmental clearance certificate renewal.

1.4 ENVIRONMENTAL COMPLIANCE CONSULTANCY

Environmental Compliance Consultancy (ECC), a Namibian consultancy registration number 2013/11401, has prepared this report on behalf of the proponent. ECC operates exclusively in the environmental, social, health and safety fields for clients in Namibia in the public and private sector. ECC is independent of the proponent and has no vested or financial interest in the project, except for fair remuneration for professional services rendered.

All compliance and regulatory comments or enquire regarding this assessment document should be forwarded by email or posted to the following address:

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1.5 THE PROPONENT DETAILS

Votorantim Metal Namibia (Pty) Ltd owns EPL 6521. The details of the proponent are provided in Table 1.

TABLE 1 – THE PROPONENT DETAILS

NAME	POSTAL ADDRESS	EMAIL ADDRESS	TELEPHONE
Votorantim Metals Namibia (Pty) Ltd Ms Yvonne Natalie Hass (Manager)	P O Box 97957, Maerua Windhoek Namibia	ext.yvonnenh@nexaresources.com	+264 61 221 016

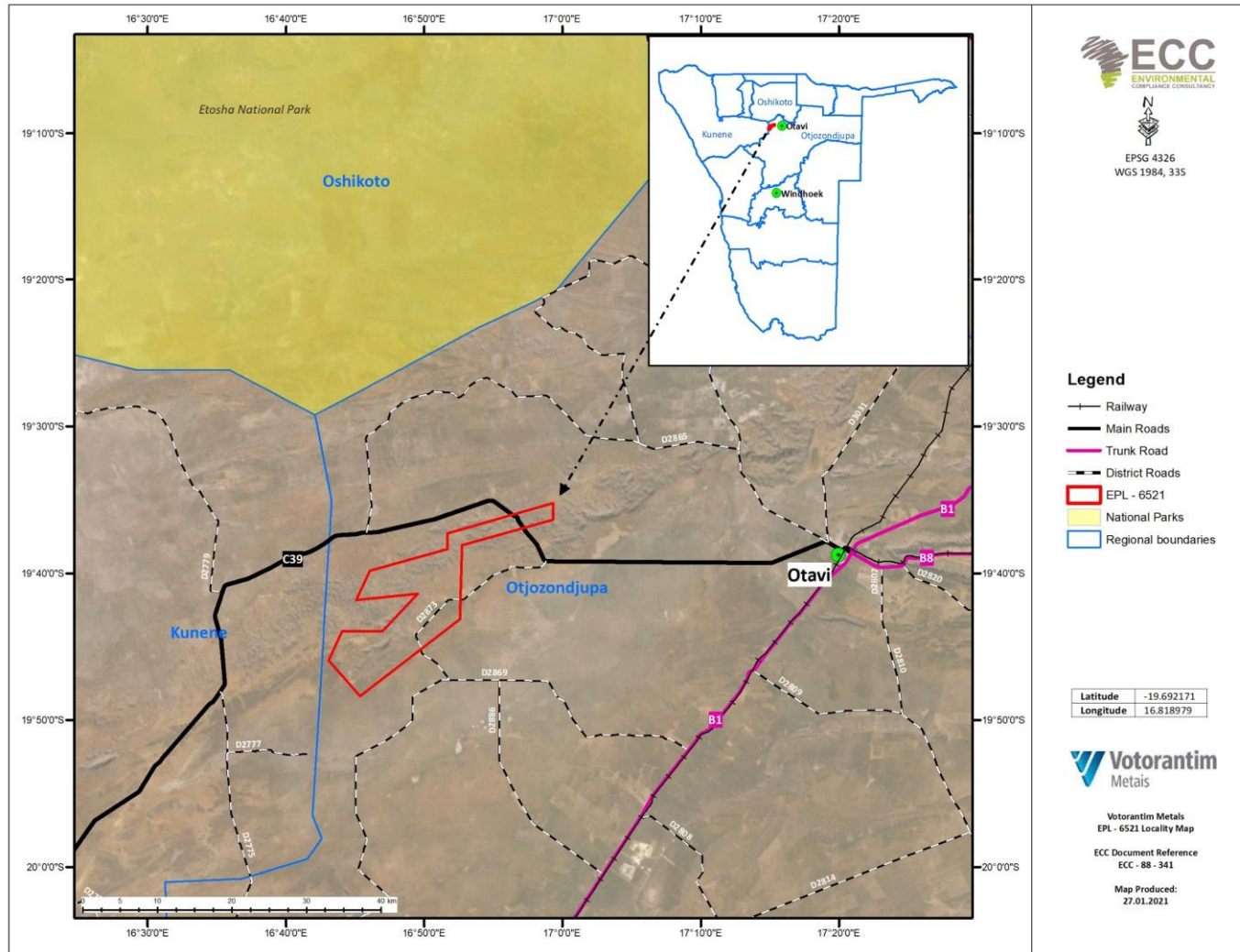


FIGURE 1 - MAP INDICATING THE LOCATION OF EPL 6521

2 ENVIRONMENTAL COMPLIANCE AUDIT

2.1 SITE INSPECTION

Environmental Compliance Consultancy (ECC) has not undertaken a site inspection for this project. This report was conducted through a series of desktop assessments, revision of relevant reports, and verification of owner documentation, and all records made available to ECC. The findings of this inspection are included in Table 2 to 7.

2.2 BI-ANNUAL COMPLIANCE AUDIT

During the reporting period (2018 - 2021) the proponent has carried out activities as summarized under this section. The project activities have been carried out in compliance with the approved EMP granted in terms of the Environmental Management Act, No. 7 of 2007. In addition to the compliance audit, the EMP will be revised to identify gaps in order to recommend additional best practice measures that were not captured in the previous EMP if need be.

During the reporting period **July 2018 – December 2018** the following activities were conducted:

- Field exploration activities consisted of:
 - Clearance of four (4) drill sites (size 15x20m) and drilling three (3) diamond (core) drill-holes;
 - Drillers camped on site for a month;
 - 188 holes (0.2X0.2m) were dug (for soil sampling) and closed after use; and
- Creation of new drill access tracks by hand approximately 0.75 km to allow vehicle access to drill holes sites:

During the reporting period **January 2019 – June 2019** the following activities were conducted:

- Exploration activities consisted mainly of soil sampling and ATM/IP surveys;
- Approximately 2.0 km of an existing bush encroached farm track along a fence was opened up;
- 20.5 km cut lines (1.0m wide) were cut by hand for geophysical surveys (AMT & IP), this left the soil undisturbed;
- 3147 small holes were dug for soil sampling and closed after use; and
- 351 small holes were dug for (AMT& IP) electrodes and closed after use.

No field exploration was done during the reporting period of **July 2019 – December 2019**.

During the reporting period **January 2020 – June 2020** the following activities were conducted:

- Two cut lines (total 2km long, 1m wide) were cut for AMT and IP surveys; and
- 170 pits (0.2m X 0.2m X 0.2m) were made for AMT/IP surveys and closed after surveys.

Further details about the activities that have occurred during this reporting period (March 2018 to March 2021) are contained in Appendix B to C (biannual, quarterly, and geotechnical reports).

2.3 DEMONSTRATION OF PROACTIVE AND BEST PRACTICE ENVIRONMENTAL MANAGEMENT

This section outlines proactive and good environmental management practices carried out by the proponent during the reporting period March 2018 to March 2021.

DRILLING REHABILITATION

The proponent ensured successful rehabilitation of the sites where activities have taken place at the end of each drilling programme, including:

- All access tracks were cleared using best practical techniques i.e. manually to avoid the use of machinery that could remove the fertile soil cover and generate irregularities in the natural terrain. Furthermore, tracks were created in areas with less vegetation, sparing the medium to large trees.
- The sites followed the standard requirements of the company, with the demarcation of boundaries by barricading tape, bunding (plastic protection) under the rig to avoid contamination of the soil by oils and greases.
- Drill holes were rehabilitated, closed/capped and the site was cleaned.

LANDOWNERS

- All access tracks were made with the consent of private landowners.
- Access tracks are maintained for future exploration activities and all farmers are aware of the recovery methods used.

2.4 COMPLIANCE AUDIT FINDINGS

The section outlines the findings of the environmental audit completed for the project. It addresses obligations in terms of the key acts that govern the activities on the site, the commitments made in the EMP, and presents the findings and recommended corrective actions where applicable (Table 2 - 7).

TABLE 2 - ENVIRONMENTAL MITIGATION MEASURES AND COMMITMENTS – GEOPHYSICS

ACTIVITY	POTENTIAL IMPACT	MANAGEMENT AND MITIGATION MEASURES	FINDINGS/OBSERVATIONS	COMPLIANCE	COMMENTS OR RECOMMENDATIONS
Ground survey	Socio-economic	<ul style="list-style-type: none"> - Honour agreements set out in the site-access contracts; - Consult with communities and provide feedback regarding activities; - Provide contact details to a designated person, who will serve as liaison between community and the exploration teams; - Farm owners to be provided with a list of all people working on site; - All staff operating on site will be provided with identification and proof that they are working for the applicant. 	<ul style="list-style-type: none"> - No complaints or evidence of non – compliance have been recorded. 	Compliant	Always maintain effective communication and transparency with affected landowners.
	Biodiversity	<ul style="list-style-type: none"> - A botanist must be consulted before intrusive activities (i.e. creating cut lines, access tracks, etc.) commence in the Otavi Mountains (Karstveld) to visit the relevant areas and advice on specific areas to be avoided and to further develop management and mitigation measures; - The footprint of the area to be disturbed for surveying and for providing access to survey sites will be minimised as far as is practically possible; - Votorantim will implement a zero-tolerance 	<ul style="list-style-type: none"> - No intrusive activities were conducted in the Otavi Mountains, and therefore no botanist was consulted. - Access tracks were opened manually where possible, in order to avoid use of machinery that could remove the fertile soil cover and generate irregularities in the natural terrain. Priority was given to areas with less vegetation (bush), sparing the medium to 	Compliant	- None



		<p>policy with regards to the killing or collecting of any biodiversity. This applies to people directly employed by Votorantim as well as any contractors working on their behalf;</p> <ul style="list-style-type: none"> - Employees and contractors will be shown the value of biodiversity and the need to conserve the species and systems that occur within the project area; and - No open fires will be permitted on site. Employees and contractors will use gas cookers for all cooking needs. 	<p>large trees. Furthermore, no evidence of non-compliance has been recorded.</p>		
	Air quality	<ul style="list-style-type: none"> - Vehicle speeds will be limited to 40km/h on access routes to limit dust; - National Road Safety Regulations that applies to usage of seatbelts and adhering to speed limits within gravel road tarred roads is to apply 	<ul style="list-style-type: none"> - No evidence of non-compliance has been recorded. 	Compliant	<ul style="list-style-type: none"> - All activities were done in accordance with the EMP and will continue as such.
	Heritage	<ul style="list-style-type: none"> - In the event that archaeological resources are discovered, a chance find emergency procedure will be implemented which includes the following: <ul style="list-style-type: none"> o All work at the find will be stopped to prevent damage; o An appropriate heritage specialist will be appointed to assess the find and related impacts; and o Permitting applications will be made to the necessary authorities, if required. - In the event that any graves are discovered 	<ul style="list-style-type: none"> - No heritage sites have been discovered. 	Compliant	<ul style="list-style-type: none"> - None


		<p>during the exploration activities, these will be avoided and preserved as a first priority. If damage is unavoidable, prior to damaging or destroying any identified graves, permission for the exhumation and relocation of graves must be obtained from the relevant descendants (if known) and the relevant local and provincial authorities.</p>			
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TABLE 3 - ENVIRONMENTAL MITIGATION MEASURES AND COMMITMENTS – RECONNAISSANCE GEOCHEMICAL SOIL SAMPLING

ACTIVITY	POTENTIAL IMPACT	MANAGEMENT AND MITIGATION MEASURES	FINDINGS/OBSERVATIONS	COMPLIANCE	COMMENTS OR RECOMMENDATIONS
Soil and rock sampling	Socio economic	<ul style="list-style-type: none"> - Refer to socio-economic management measures relating to ground surveying (Table 2). 	<ul style="list-style-type: none"> - No evidence of non-compliance has been recorded. 	Compliant	<ul style="list-style-type: none"> - Always maintain effective communication and transparency with affected landowners.
	Biodiversity	<ul style="list-style-type: none"> - Refer to biodiversity management measures relating to ground surveying (Table 2); - Rehabilitate all excavations sites by infilling and topsoil replacement; - Rehabilitate access tracks and cut lines by ripping, unless the landowner wishes to continue using the access tracks for his/her farming activities; - Farm owners will be invited to carry out site inspections following rehabilitation in order to ensure that it has been carried out suitably; and - Votorantim policy is to open and close pit/ excavations within single days in order to minimise the risks associated with excavations. 	<ul style="list-style-type: none"> - Access tracks (0.75 km long) were created, and priority was given to places with less vegetation (bush), sparing the medium to large trees. Access tracks were opened manually where possible, in order to avoid use of machinery that could remove the fertile soil cover and generate irregularities in the natural terrain. 	Compliant	<ul style="list-style-type: none"> - None



TABLE 4 - ENVIRONMENTAL MITIGATION MEASURES AND COMMITMENTS – DRILL SITE ESTABLISHMENT

ACTIVITY	POTENTIAL IMPACT	MANAGEMENT AND MITIGATION MEASURES	FINDINGS/OBSERVATIONS	COMPLIANCE	COMMENTS OR RECOMMENDATIONS
<p>Access the drill site using a new access track where necessary.</p> <p>Set-up drilling machine with drip trays and groundsheets.</p> <p>Strip vegetation and topsoil (up to 300mm where available).</p> <p>Temporarily store topsoil adjacent to drill site.</p>	Air quality	<ul style="list-style-type: none"> - The movement of drilling related vehicles on the unpaved access track will be on a small scale; - Vehicle speeds will be limited to 30km/h on site (40km/h on access routes); - Vehicles and the drilling rig will be maintained in good working order; and - Minimise new access route development (routes to be approved by landowners prior to development). 	 <p>Drill rig in operation</p>	<p style="text-align: center; color: green; font-weight: bold;">Compliant</p>	<ul style="list-style-type: none"> - All activities have been carried out in accordance with the EMP.
	Biodiversity	<ul style="list-style-type: none"> - Refer to biodiversity management measures relating to ground surveying and sampling (Table 2 and Table 3); and - Honor agreements set out in the site-access contracts, specifically relating to the areas utilized for tourism, hunting and livestock farming. Special consideration should be given to the sensitive hunting season. 	 <p>Drill rig and sumps</p>		
	Land use	<ul style="list-style-type: none"> - Access agreements to be prepared and approved prior to drill site establishment; - The footprint of the area to be disturbed will be minimised as far as is practically possible; - Areas used as laydown areas are to be raked and/or ploughed to encourage re-vegetation; and 			

Set-up mobile ablution facilities		<ul style="list-style-type: none"> - Agree on relevant compensation with landowners where land uses are impacted. 			
	Waste management	<ul style="list-style-type: none"> - Suitable receptacles (Wheelie Bins) for waste disposal should be available at all exploration sites. These receptacles will be clearly marked for different waste types; - Ensure all Receptacles have lid tops to prevent waste from being blown away; - Waste shall be separated and recycled / re-used where possible; - No burning or burying of waste material will be allowed on site; - Employees and contractors will be shown the importance of correct waste disposal as well as waste minimisation and recycling; - Waste will be removed from site and disposed of at a suitable licensed waste disposal facility; - Hazardous waste (including hydrocarbon contaminated material/soil) will be disposed of at a licenced hazardous waste disposal facility; - Written evidence of safe disposal of waste will be kept; - Ensure daily inspection of waste bins and waste bin area to ensure waste is managed appropriately; and - All contractors should bring to site appropriate mobile toilet facilities for the exploration workers. 			
Set-up fuel and lubricants storage area					
Waste management					

	Socio-economic	- Refer to socio-economic management measures relating to ground surveying (Table 2)	- No complaints or evidence of non-compliance have been recorded.	Compliant	- Maintain good communication with landowners in the surrounding area.
	Heritage	- Refer to heritage management measures relating to ground surveying and sampling (Table 2)	- Not applicable, no heritage sites discovered.	Compliant	- None
	Noise	- Vehicles will travel maximum 30 km/hour near houses/settlements. - No operations are to be conducted at night	- No complaints or evidence of non-compliance have been recorded.	Compliant	- None

TABLE 5 -ENVIRONMENTAL MITIGATION MEASURES AND COMMITMENTS – DRILLING

ACTIVITY	POTENTIAL IMPACT	MANAGEMENT AND MITIGATION MEASURES	FINDINGS/OBSERVATIONS	COMPLIANCE	COMMENTS OR RECOMMENDATIONS
<p>Drill borehole</p> <p>Contain all drilling water in the sump and allow to settle</p> <p>Log the drill core and place on core trays</p> <p>Maintain ablution facilities</p>	<p>Contamination of soil/hydrocarbon spillage</p>	<ul style="list-style-type: none"> - In all areas where there is storage of hazardous substances (i.e. hydrocarbons), there will be containment of spillages on impermeable floors and bunded trays that can contain 110% of the volume of the hazardous substances; - Regular inspection of hazardous storage area is required; - Regular environmental awareness through training should include potential risks associated with hydrocarbons; - Votorantim will establish environmental awareness in employees and contractors; - All refuelling and any maintenance of vehicles will take place on impermeable surfaces; - Pollution will be prevented through basic infrastructure design and through maintenance of equipment; - Spill kits will be readily available on site. Employees and/or contractors will be shown to use the spill kits to enable containment and remediation of pollution incidents; - A PVC lined sump will be used for collection of oils and silt contained in the drilling water; 	 <p>Drill rig in operation</p>  <p>Drill rig and sumps</p>	<p>Compliant</p>	<p>– No evidence of non-compliance has been recorded.</p>

		<ul style="list-style-type: none"> - Any spills will be contained and cleaned up immediately; and - Non-toxic and biodegradable drilling lubricant will be used. 	<ul style="list-style-type: none"> - The staff followed the standard requirements of the company, with the demarcation of boundaries by barricading tape, bunding (plastic protection) under the rig to avoid contamination of the soil by oils and greases. 		
	Groundwater and surface water contamination	<ul style="list-style-type: none"> - Licenses in terms of the Water Resource Management Act (Act No. 11 of 2013) will be obtained shall the need to drill boreholes for water abstraction purposes arise. - Contractors should bring appropriate Mobile toilet facilities for the exploration site. 	<ul style="list-style-type: none"> - Flush/chemical toilets were available onsite, and they were disposed of appropriately at the Otavi municipal refuse dump. No evidence of non-compliance has been recorded. 	Compliant	<ul style="list-style-type: none"> - Keep record of evidence (photographs) for reporting purposes.
	Air quality deterioration	<ul style="list-style-type: none"> - Vehicle speeds will be limited to 40km/h on access routes and 30Km/h on residential farm property or through settlements to limit dust; - The movement of drilling related vehicles on unpaved access track will be on a small scale; and - Water sprays can be used around the lay-down area when a drill- site is located near settlements. 	<ul style="list-style-type: none"> - No evidence of non - compliance 	Compliant	<ul style="list-style-type: none"> - Keep record (photographs) as evidence of successful implementation of recommended measures (water sprayed soil to suppress dust) to be included in the compliance report.
	Noise generation	<ul style="list-style-type: none"> - Drilling will only be conducted during the day 	<ul style="list-style-type: none"> - No complaints have been 	Compliant	<ul style="list-style-type: none"> - Maintain good


		<p>when drill sites are located close to inhabited homesteads;</p> <ul style="list-style-type: none"> - Drilling plans and schedules will be discussed and agreed upon with landowners prior to initiation; and - Vehicles will travel maximum 30 km/hour near houses/settlements. 	<p>recorded with regards to noise generation.</p>		<p>communication with landowners in the surrounding area.</p>
	Land use	<ul style="list-style-type: none"> - Refer to land use management measures relating to drill site establishment (Table 4) 	<ul style="list-style-type: none"> - No evidence of non-compliance has been recorded. 	Compliant	<ul style="list-style-type: none"> - Maintain good communication with landowners in the surrounding area.
	Social – provision of toilet facilities	<ul style="list-style-type: none"> - Provide appropriate mobile toilet facilities (Chemical) for the exploration workers on the site; - Ensure that sewerage- effluent tanks if required or installed at the exploration site are managed properly; - Ensure that mobile toilets are working properly and are cleaned at least weekly, so they do not pollute the surrounding environment or create hygiene problems; - The contractor should ensure regular servicing of mobile toilets; - All sewerage from the chemical toilets and tanks will be pumped out by a contractor when required; and - Personnel may not relieve themselves in the 	<ul style="list-style-type: none"> - Flush/chemical toilets were available onsite, and they were disposed of appropriately at the Otavi municipal refuse dump 	Compliant	<ul style="list-style-type: none"> - Always maintain good housekeeping.


<p>Water abstraction</p>	<p>Groundwater quantity</p>	<p>surrounding bush.</p> <ul style="list-style-type: none"> - No abstraction of water is anticipated; - The farming water reservoir will be used as per terms of agreement with the farm owner to extract an amount of approximately 3 cubic meters per day; - Shall the need arise to draw more 3 cubic meter of water per day due to operational demand, the farm owner shall be informed and the current terms of agreement on the extraction of water from the farming reservoir shall be amended to include the additional required water quantity. The quantity of water required should not affect the day to day farming activities in the area; - Shall the need arise to drill boreholes for water abstraction purposes, water levels will be measured prior to abstraction, during abstraction (daily) and after completion. Levels will be reported to Farm owners. Water abstraction permit conditions will apply; and - Should water be reached during drilling the farm owners will be informed. Should the Farm owners wish it; the holes will be cased and left for use by the community (liability relating to the boreholes will then be transferred to the Farm Owners). 	<ul style="list-style-type: none"> - No boreholes were drilled for water abstraction purposes. Drilling occurred for core sampling only. 	<p>Compliant</p>	<ul style="list-style-type: none"> - None
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TABLE 6 - ENVIRONMENTAL MITIGATION MEASURES AND COMMITMENTS- SOCIAL ISSUES & TRAINING

ACTIVITY	POTENTIAL IMPACT	MANAGEMENT AND MITIGATION MEASURES	FINDINGS/OBSERVATIONS	COMPLIANCE	COMMENTS OR RECOMMENDATIONS
Employees – social issues, Training & Awareness	Violence ,health and safety issues	<ul style="list-style-type: none"> - Have zero tolerance to alcohol in the workplace. - Establish a HIV / AIDS / TB workplace policy and wellness programme. - Only People working for Votorantim or their contractors will be allowed to stay at the on-site accommodation. - First Aid Kits should be at all sites and drill camp to be used when needed. - Ambulance/ Emergency numbers should be written and placed at all exploration. - All individuals who work on, or visit, the sites are aware of the contents of the EMP. 	<ul style="list-style-type: none"> – No evidence of non-compliance has been recorded. 	Compliant	<ul style="list-style-type: none"> - None

TABLE 7 - ENVIRONMENTAL MITIGATION MEASURES AND COMMITMENTS – CLOSURE AND REHABILITATION

ACTIVITY	POTENTIAL IMPACT	MANAGEMENT AND MITIGATION MEASURES	FINDINGS/OBSERVATIONS	COMPLIANCE	COMMENTS OR RECOMMENDATIONS
<p>General closure activities:</p> <p>Close drill holes (unless otherwise agreed with the Farm owner)</p> <p>Remove water from the sump and drip trays</p> <p>Remove oils and silt from drip trays and store until disposal to</p>	<p>Groundwater and surface water contamination</p>	<ul style="list-style-type: none"> - In all areas where there is storage of hazardous substances (i.e., hydrocarbons), there will be containment of spillages on impermeable floors and bunded trays that can contain 110% of the volume of the hazardous substances; - All refuelling and any maintenance of vehicles will take place on impermeable surfaces; - Pollution will be prevented through basic infrastructure design and through maintenance of equipment; - Spill kits (drip trays) will be readily available on site. Employees and/or contractors will be shown how to use the spill kits to enable containment and remediation of pollution incidents; - Any spills will be contained and cleaned up immediately; 		<p>Compliant</p>	<ul style="list-style-type: none"> – There is no evidence of non – compliance, the proponent carried out the activities in accordance with the EMP. – The drill sites have been rehabilitated successfully as indicated on the images in the 4th column. – The proponent should keep it up with good post drilling

<p>permitted hazardous landfill site.</p> <p>Backfill the sump once it has dried out (dome to allow for subsidence) and plug borehole (unless an agreement is in place with community for alternative uses)</p> <p>Move drill core trays, ablution facilities, water bowser, stores and drill rig from the site.</p> <p>Dispose of any general waste to a permitted landfill site.</p>	Soil erosion	<ul style="list-style-type: none"> - Impacted footprints are to be raked and/or ploughed to encourage re-vegetation; - Access routes will be ripped unless the land owners wish for them to remain; - A monitoring program will be implemented to establish re-vegetation progress; and - Agree on relevant compensation with land-owners where land used for hunting purposes is impacted. 	 <p>Post drilling (cleaned drill site).</p>		<p>environmental rehabilitation practices.</p> <ul style="list-style-type: none"> - Maintain good communication with the community. 	
	Waste management	<ul style="list-style-type: none"> - Decommission ablution facilities; and - Ensure that all waste generated during activities is removed from the site and disposed of appropriately. 				
	Land use	<ul style="list-style-type: none"> - Farm owners will be invited to carry out site inspections following rehabilitation in order to ensure that it has been carried out suitably. 				
	Noise pollution	<ul style="list-style-type: none"> - Vehicles will travel maximum 30 km/hour near houses/settlements. 	<ul style="list-style-type: none"> - Not applicable 		Compliant	<ul style="list-style-type: none"> - None
	Biodiversity	<ul style="list-style-type: none"> - Refer to rehabilitation requirements relating to biodiversity in Table 2. 	<ul style="list-style-type: none"> - No evidence of non-compliance has been recorded. 		Compliant	<ul style="list-style-type: none"> - None
	Air quality deterioration	<ul style="list-style-type: none"> - Vehicle speeds will be limited to 60km/h on access routes to limit dust. - The movement of drilling related vehicles on unpaved access track will be on a small scale. 	<ul style="list-style-type: none"> - Not applicable 		Compliant	<ul style="list-style-type: none"> - None

Remove temporary fencing					
Rip and plough compacted areas					
Replace topsoil over disturbed area					
Rehabilitate access track by ripping					
GPS marker to identify drill site					

3 CONCLUSION AND RECOMMENDATIONS

Exploration work was carried out in compliance with the relevant requirements of the Minerals (Prospecting and Mining) Act, 1992. To date, no significant impacts resulting from the current activities have been identified and management and mitigation measures are in place for potential risks.

It is recommended that the proponent continues to adhere to all environmental legislation and company standards to ensure that best practical environmental protection continues as exploration activities progress.

On this basis, Environmental Compliance Consultancy is of the professional opinion that the proponent has been able to demonstrate compliance to the approved EMP and that the renewal for Environmental Clearance Certificate should be granted to the proponent for the activities at the EPL 6521.

3.1 NEXT STEPS

The proponent plans to continue with the exploration activities on EPL 6521 over the next period. The proponent will continue to carry out the following activities:

- Geological Mapping - Review of geological maps of the area and updating where relevant, should any further information be obtained.
- Geophysics - The collection of information of the substrata, by air and ground, through sensors such as radar, magnetic and electromagnetic to detect any mineralisation in the area.
- Sampling - Samples of soil and rock will be collected and sent for geochemical trace element analysis to determine if sufficient quantities of a base or precious metal or industrial mineral are present. These analyses are conducted by analytical chemistry laboratories.
- Drilling - Holes will be drilled, and drill samples collected for analysis of major and trace elements.

APPENDIX A – ENVIRONMENTAL CLEARANCE CERTIFICATE TO BE RENEWED



REPUBLIC OF NAMIBIA

MINISTRY OF ENVIRONMENT AND TOURISM

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22 March 2018

OFFICE OF THE ENVIRONMENTAL COMMISSIONER

The Managing Director
Votorantim Metals Namibia (Pty) Ltd
P.O. Box 97957
Windhoek
Namibia

Dear Sir or Madam,

SUBJECT: ENVIRONMENTAL CLEARANCE CERTIFICATE FOR THE PROPOSED EXPLORATION ACTIVITIES ON EXCLUSIVE PROSPECTING LICENSE (EPL) NO. 6521, OTAVI DISTRICT, OTJOZONDJUPA REGION

The Environmental Scoping Report and Environmental Management Plan submitted are sufficient as it made provisions of the environmental management concerning the project's activities. From this perspective regular environmental monitoring and evaluations should be conducted. Targets for improvements should be established and monitored from time to time.

This Ministry reserves the right to attach further legislative and regulatory conditions during the operational phase of the project. From this perspective, I issue this clearance with the condition that all land owners may be notified at all times on the operations of the project.

On the basis of the above, this letter serves as an Environmental Clearance Certificate for the project to commence. However, this clearance letter does not in any way hold the Ministry of Environment and Tourism accountable for misleading information, nor any adverse effects that may arise from this project activity. Instead, full accountability rests with Votorantim Metals Namibia (Pty) Ltd and their consultants.

This environmental clearance is valid for a period of 3 (three) years, from the date of issue unless withdrawn by this office.

Yours sincerely,


Teofilus Nghitila
ENVIRONMENTAL COMMISSIONER
Office of the
Environmental Commissioner



“Stop the poaching of our rhinos”

All official correspondence must be addressed to the Permanent Secretary

APPENDIX B – BIENNIAL AND QUARTELY REPORTS

APPENDIX C – GEOTECHNICAL REPORT

APPENDIX D – PREVIOUSLY APPROVED EIA AND EMP