

UPDATED ENVIRONMENTAL MANAGEMENT PLAN (EMP) FOR  
ACTIVITIES ASSOCIATED WITH EPANGELO MINING COMPANY'S  
PROPOSED EXPLORATION ACTIVITIES ON EPLs 4817 & 4833,  
LOCATED IN ERONGO REGION, NAMIBIA

MAY 2021

Prepared for:

Epangelo Mining Company (Pty) Ltd

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Namibia

## **EXPERTISE AND DECLARATION OF INDEPENDENCE**

### **CONSULTANT'S EXPERTISE**

I.N.K Enviro Consultants cc is the independent firm of consultants that has been appointed by Epangelo Mining Company (Pty) Ltd (Epangelo) to undertake the environmental clearance certificate renewal process.

Immanuel N. Katali, the EIA Lead Practitioner holds a B.Arts (Honors) in Geography, Environmental Studies and Sociology and has over six years of relevant experience in conducting/managing Environmental Impact Assessments (EIAs), Socio-Economic Impact Assessments (SIA) and compiling Environmental Management Plans (EMPs) in Namibia. Immanuel is certified as an environmental practitioner under the Environmental Assessment Professionals Association of Namibia (EAPAN).

### **DECLARATION OF INDEPENDENCE AND DISCLAIMER**

The consultant herewith declare that this report represents an independent, objective assessment of the environmental impacts associated with the exploration activities on EPL 4817.

I.N.K has prepared this report based on an agreed scope of work and acts in all professional matters as an independent environmental consultant to Epangelo and exercises all reasonable skill and care in the provision of its professional services in a manner consistent with the level of care and expertise exercised by members of the environmental profession.

I.N.K does not express an opinion as to the accuracy or completeness of the information provided, the assumptions made by the parties that provided the information or any conclusions reached. I.N.K has based this Report on information received or obtained, on the basis that such information is accurate and, where it is represented to I.N.K as such, complete.

I.N.K is not responsible and will not be liable to any other person or organisation for or in relation to any matter dealt within this report, or for any loss or damage suffered by any other person or organisation arising from matters dealt with or conclusions expressed in this report (including without limitation matters arising from any negligent act or omission of I.N.K or for any loss or damage suffered by any other party relying upon the matters dealt with or conclusions expressed in this report). This report must not be altered or added to without the prior written consent of I.N.K.

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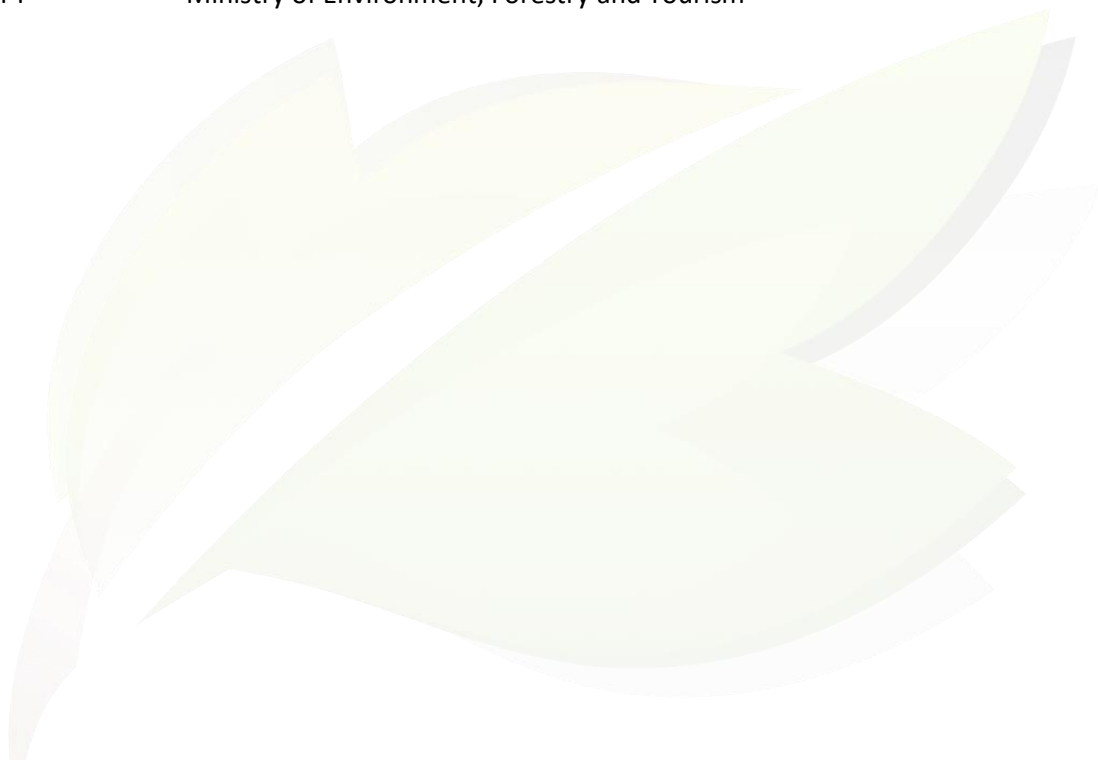
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## LIST OF ACRONYMS, ABBREVIATIONS AND UNITS

DEA	Department of Environmental Affairs
ECC	Environmental Clearance Certificate
EIA	Environmental Impact Assessment
EMA	Environmental Management Act
EMP	Environmental Management Plan
EPL	Exclusive Prospecting License
I.N.K	I.N.K Enviro Consultants cc
MEFT	Ministry of Environment, Forestry and Tourism



## 1 INTRODUCTION

### 1.1 Introduction to the Proposed Project

Epangelo Mining Company (Pty) Ltd (hereinafter referred to as Epangelo), intends on obtaining an extension to their Environmental Clearance Certificate (ECC) for their proposed exploration activities on EPL 4817, located in Erongo Region. As part of the requirements by the Ministry of Environment, Forestry and Tourism, Epangelo is expected to submit an updated EMP to reflect the extension.

Epangelo was issued the Environmental Clearance Certificate (ECC) for the above-mentioned EPL on 04 April 2018, for a validity period until 04 April 2020. The company has been seeking to acquire a partner (JG Investment Sixteen) in order to secure funding for their proposed exploration activities. The contracts and agreements with JG Investment Sixteen have therefore been finalized for EPL 4817; hence, the request for the ECC renewal, in order to immediately commence with their exploration programme. However, a different partner has been acquired for the other two EPLs (4833 and 4818), therefore, a separate ECC Renewal Process has been undertaken for them.

In addition, there has not been any exploration activities conducted on EPL 4817, during the validity period of the ECC.

The above-mentioned activities are covered in an Environmental Scoping Study & Associated Environmental Management Plan conducted by SLR Environmental Consulting (Namibia) (Pty) Ltd in 2014.

Prior to commencement of the operation activities, an Environmental Clearance Certificate (ECC) is required on the basis of an approved Environmental Impact Assessment (EIA) and Environmental Management Plan (EMP). It is with this background that, I.N.K Enviro Consultants cc (I.N.K) an independent firm of consultants, was appointed to compile an updated EMP for this project.

### 1.2 Details of the persons who compiled this EMP

I.N.K Enviro Consultants cc is the independent firm of consultants that has been appointed by Epangelo to compile an updated EMP.

Immanuel N. Katali, the EIA project manager and lead practitioner holds a B.Arts (Honours) Degree in Geography, Environmental Studies and Sociology and has over six years of relevant experience in conducting/managing EIAs, compiling EMPs and Socio-Economic Studies. Immanuel is certified as an environmental practitioner under the Environmental Assessment Professionals Association of Namibia (EAPAN).

## 2 ENVIRONMENTAL ACTION PLANS

The purpose of this Environmental Management Plan (EMP) is to present the recommendations from the Scoping Report in the form of Environmental Specifications that can be practically implemented and enforced on site. These actions are required to minimise negative impacts and enhance positive impacts associated with the operations.

The EMP gives the commitments, which form the environmental contract between Epangelo and the Government of the Republic of Namibia; represented by the Ministry of Environment, Forestry and Tourism (MEFT).

The management measures proposed to mitigate the potential impacts are detailed in the action plans below.

### 2.1 Action plans to achieve objectives and goals

Action plans to achieve relevant objectives/goals are listed in tabular format together with timeframes for each action. The action plans include the timeframes and frequency for implementing the mitigation measures as well as identifying the responsible party.

The Environmental Specifications also deal with the need for monitoring. This includes monitoring of the Project Proponent's Compliance with these Specifications (by the Environmental Scientist), and the need for monitoring of various environmental impacts (by the Authorities). The Environmental Specifications are set out for convenience under headings according to the project activity.

**Table 1: Action Plan – Field Mapping, Geophysical Surveys and Soil Sampling**

Activity	Potential Impact	Management and Mitigation Measures	Action Plan	
			Frequency	Responsible Parties
Air survey	Noise	<ul style="list-style-type: none"> <li>- Discuss flight plans and schedule with land owners prior to air surveys.</li> <li>- Avoid residences, game and livestock enclosures where possible.</li> <li>- Where possible, avoid air surveys during hunting season (1 February until 30 November). Where not possible, schedule exploration activities in such a way that disturbances to hunting operations are minimised.</li> </ul>	Prior to air surveys	Project Manager Pilots
Ground geophysical surveys, geological mapping, geochemical soil sampling and trenching/pitting	Socio-economic	<ul style="list-style-type: none"> <li>- Honour agreements set out in the site-access contracts</li> <li>- Schedule exploration activities in such a way that disturbances to hunting operations are minimised. No new access tracks are created during mapping and soil sampling if not otherwise agreed with the landowner during the land access agreement.</li> <li>- Consult landowner if dangerous animals are on the farm</li> <li>- No firearms are allowed on the farm</li> <li>- Consult and provide feedback regarding activities on the individual properties</li> <li>- Provide contact details of a designated Epangelo person, who will serve as liaison between landowners and the exploration teams</li> <li>- Poaching and plant theft will not be tolerated and staff found in possession will be prosecuted</li> <li>- Land owners to be provided with a list of all people working on site along with a photographic key for easy identification.</li> <li>- Staff will be provided with visible identification.</li> <li>- All staff operating on site will be provided with identification and proof that they are working for the applicant</li> <li>- Ensure gates are closed after entry and exit.</li> <li>- Notify landowner in advance of planned exploration activities.</li> <li>- Include in landowner agreement that no smoking is permitted in the veld.</li> </ul>	Duration of mapping and surveying	Project Manager Site supervisor

Activity	Potential Impact	Management and Mitigation Measures	Action Plan	
			Frequency	Responsible Parties
		- Scheduling/planning along with residents		
	Biodiversity	<ul style="list-style-type: none"> <li>- The footprint of the area to be disturbed for surveying/mapping and for providing access to survey sites will be minimised as far as is practically possible.</li> <li>- Epangelo will implement a zero-tolerance policy with regards to the killing or collecting of any biodiversity. This applies to people directly employed by Epangelo as well as any contractors working on their behalf.</li> <li>- 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.</li> <li>- Inform Epangelo of botanical sensitive areas, include no-go areas in the landowner agreement</li> <li>- No open fires will be permitted on site.</li> <li>- Speed limits will be enforced so as to prevent road kills.</li> <li>- Permits will be required for the removal of protected tree species.</li> <li>- Pits and trenches will either be opened and closed on the same day or will be fenced off until such time as they can be closed.</li> <li>- Ensure that trenches and pits allow for smaller animals to exit the pits/trenches if they fall into them.</li> <li>- No excavations will be left open overnight unless fenced off.</li> <li>- Consult farmers to help ID important sites and species.</li> <li>- A floral survey of all pit/trench sites need to be conducted prior to establishment.</li> </ul>	Duration of mapping and surveying	Project Manager Site supervisor



Activity	Potential Impact	Management and Mitigation Measures	Action Plan	
			Frequency	Responsible Parties
	Air quality	<ul style="list-style-type: none"> <li>- Vehicle speeds will be limited to 40km/h on access routes to limit dust.</li> </ul>	Duration mapping surveying	of and Project Manager Site supervisor
	Heritage	<ul style="list-style-type: none"> <li>- Consult with landowner to identify known archaeological sites on the farm</li> <li>- 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"> <li>o All work at the find will be stopped to prevent damage;</li> <li>o An appropriate heritage specialist will be appointed to assess the find and related impacts; and</li> <li>o Permitting applications will be made to the necessary authorities, if required.</li> </ul> </li> <li>- In the event that any graves are discovered 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.</li> </ul>	Duration mapping surveying	of and Project Manager Site supervisor

**Table 2: Action Plan – Drill Site Establishment**

Activities	Potential Impact	Management and Mitigation Measures	Action Plan	
			Frequency	Responsible Parties
<ul style="list-style-type: none"> <li>- Access the drill site using a new access track where necessary</li> <li>- Set-up drilling machine with drip trays and groundsheets</li> <li>- Strip vegetation and topsoil (up to 300mm where available)</li> <li>- Temporarily store topsoil adjacent to drill site</li> <li>- Set-up ablution facilities</li> <li>- Set-up fuel and lubricants storage area</li> <li>- Waste management</li> </ul>	Air quality – dust and gaseous emissions	<ul style="list-style-type: none"> <li>- The movement of drilling related vehicles on the unpaved access track will be on a small scale</li> <li>- Vehicle speeds will be limited to 30km/h on site</li> <li>- Vehicles and the drilling rig will be maintained in good working order</li> <li>- Minimise new access route development (routes to be approved by land owners prior to development)</li> </ul>	On-going	Project Manager Site supervisor
	Noise	<ul style="list-style-type: none"> <li>- Vehicles will travel maximum 30km/hour near houses/settlements</li> </ul>	Ongoing	Project Manager Site supervisor
	Biodiversity	<ul style="list-style-type: none"> <li>- Refer to biodiversity management measures relating to ground surveying, mapping and sampling (Table 1).</li> <li>- A floral survey of all drill sites needs to be conducted prior to establishment to ensure that no protected (under the Ministry of Environment and CITES) species are destroyed.</li> <li>- Honour agreements set out in the site-access contracts, specifically relating to the areas utilised for game and livestock farming. Special consideration should be given to the sensitive hunting season.</li> <li>- Provide appropriate toilet facilities for the exploration workers on the site or agree with landowner to use certain facilities on the farm.</li> </ul>	Ongoing	Project Manager Site supervisor

	Land use	<ul style="list-style-type: none"> <li>- Access agreements to be prepared and approved prior to drill site establishment.</li> <li>- The footprint of the area to be disturbed will be minimised as far as is practically possible. The drill site should be fenced in with tape to ensure that all scheduled activities stay within the demarcated area. All tape must be removed from the site upon completion.</li> <li>- Agree on relevant compensation with land-owners where land uses are impacted.</li> </ul>	Ongoing	Project Manager Site supervisor
	Soil Erosion	<p>To minimise erosion access tracks should be created as follow:</p> <ul style="list-style-type: none"> <li>• Follow as much as possible contour lines</li> <li>• Erect berms to minimise soil erosion during rain events</li> <li>• Don't create furrows, channels etc, which could lead to soil erosion during rain events. Contour lines or perpendicular to the slopes.</li> </ul>		
	Socio-economic	<ul style="list-style-type: none"> <li>- Refer to socio-economic management measures relating to ground surveying, mapping and sampling (Table 1)</li> <li>- Discuss water use with landowner in case of diamond drilling</li> </ul>	Ongoing	Project Manager Site supervisor
	Heritage	<ul style="list-style-type: none"> <li>- Refer to heritage management measures relating to ground surveying, mapping and sampling (Table 1).</li> </ul>	Ongoing	Project Manager Site supervisor

**Table 3: Action Plan – Drilling**

Activities	Potential Impact	Management and Mitigation Measures	Action Plan	
			Frequency	Responsible Parties
<ul style="list-style-type: none"> <li>- Drill borehole</li> <li>- Contain all drilling water in the sump and allow to settle</li> <li>- Log the drill core and place on core trays</li> <li>- Maintain ablution facilities</li> </ul>	Contamination of soil/Hydrocarbon spillages	<ul style="list-style-type: none"> <li>- 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.</li> <li>- All refuelling and any maintenance of vehicles will take place on impermeable surfaces.</li> <li>- Pollution will be prevented through basic infrastructure design and through maintenance of equipment.</li> <li>- 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.</li> <li>- Environmental awareness training of contractor.</li> <li>- Epangelo will establish environmental awareness in employees and contractors.</li> </ul>	On-going for all drilling activities	Project Manager Site supervisor
	Groundwater contamination	<ul style="list-style-type: none"> <li>- Refer to management measures relating to contamination of soils.</li> <li>- Licenses in terms of the Water Resource Management Act (Act No. 11 of 2013) will be obtained for all drilled holes (not just boreholes). Provide appropriate toilet facilities for the exploration workers on the site or agree with landowner to use certain facilities on the farm.</li> <li>- If chemical toilets are provided, these need to be serviced by an authorised company.</li> </ul>	On-going for all drilling activities	Project Manager Site supervisor

Activities	Potential Impact	Management and Mitigation Measures	Action Plan	
			Frequency	Responsible Parties
	Air quality deterioration	<ul style="list-style-type: none"> <li>- Vehicle speeds will be limited to 40km/h on access routes to limit dust.</li> <li>- The movement of drilling related vehicles on unpaved access track will be on a small scale.</li> <li>- Water sprays can be used around the lay-down area when a drill-site is located.</li> </ul>	On-going for all drilling activities	Project Manager Site supervisor
	Noise generation	<ul style="list-style-type: none"> <li>- Drilling will only be conducted during the day when drill sites are located close to inhabited homesteads.</li> <li>- Drilling plans and schedules will be discussed and agreed upon with land owners prior to initiation.</li> <li>- Vehicles will travel maximum 30 km/hour near houses/settlements.</li> </ul>	On-going for all drilling activities	Project Manager Site supervisor
	Land use	<ul style="list-style-type: none"> <li>- Refer to land use management measures relating to drill site establishment (Table 2)</li> </ul>	On-going for all drilling activities	Project Manager Site supervisor
Water abstraction	Groundwater quantity	<ul style="list-style-type: none"> <li>- An agreement to abstract water from existing boreholes must be included in the land access agreement.</li> <li>- Water use licenses in terms of the Water Resource Management Act (Act No. 11 of 2013) will be obtained for all boreholes.</li> <li>- Water levels will be measured prior to abstraction, during abstraction (daily) and after completion. Levels will be reported to land owners.</li> </ul>	On-going for all drilling activities	Project Manager Site supervisor

**Table 4: Action Plan - Relevant to all Exploration Activities**

Activities	Potential Impact	Management and Mitigation Measures	Action Plan	
			Frequency	Responsible Parties
- All exploration activities	Social – provision of toilet facilities	- Provide appropriate toilet facilities for the exploration workers on the site or agree with landowner to use certain facilities on the farm.	On-going for all exploration activities	Project Manager Site supervisor
	Waste Management	<ul style="list-style-type: none"> <li>- Waste generated will be handled in accordance with the contract signed with the landowner.</li> <li>- Suitable receptacles for waste disposal will be provided at appropriate locations on site. These receptacles will be clearly marked for different waste types.</li> <li>- Employees and contractors will be shown the importance of correct waste disposal as well as waste minimisation and recycling.</li> <li>- Waste will be removed from site and disposed of at a suitable licensed waste disposal facility.</li> <li>- Hazardous waste (including hydrocarbon contaminated material/soil) will be disposed of at a licenced hazardous waste disposal facility (Kupferberg).</li> </ul>		Project Manager Site supervisor

**Table 5: Action Plan – Closure and Rehabilitation**

Activities	Potential Impact	Management and Mitigation Measures	Action Plan	
			Frequency	Responsible Parties
<p>General closure activities:</p> <ul style="list-style-type: none"> <li>- Close drill holes (unless otherwise agreed with farmers)</li> <li>- Remove water from the sump and drip trays</li> <li>- Remove oils and silt from drip trays and store until disposal to permitted hazardous landfill site</li> <li>- Backfill the sump once it has dried out (dome to allow for subsidence) and plug borehole (unless an agreement is in place with landowner for alternative uses)</li> <li>- Move drill core trays, ablution facilities, water bowser, stores and drill rig from the site</li> <li>- Dispose of any general waste to a permitted landfill site</li> </ul>	Groundwater and surface water contamination	<ul style="list-style-type: none"> <li>- 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.</li> <li>- All refuelling and any maintenance of vehicles will take place on impermeable surfaces.</li> <li>- Pollution will be prevented through basic infrastructure design and through maintenance of equipment.</li> <li>- Spill kits 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.</li> <li>- Any spills will be contained and cleaned up immediately</li> </ul>	Once- Closure of drill site	Project Manager Site supervisor
	Noise pollution	<ul style="list-style-type: none"> <li>- Vehicles will travel maximum 30 km/hour near houses/settlements.</li> </ul>	On-going	Project Manager Site supervisor
	Contamination of soils	<ul style="list-style-type: none"> <li>- Refer to management measures relating to contamination of water</li> </ul>	On-going and closure	Project Manager Site supervisor
	Air quality deterioration	<ul style="list-style-type: none"> <li>- Vehicle speeds will be limited to 40km/h on access routes to limit dust.</li> <li>- The movement of drilling related vehicles on unpaved access track will be on a small scale.</li> </ul>	On-going	Project Manager Site supervisor
	Soil erosion	<ul style="list-style-type: none"> <li>- Impacted footprints are to be raked and/or ploughed to encourage re-vegetation</li> <li>- Access routes and drill pads will be ripped unless the land owners wish for them to remain.</li> <li>- A monitoring program will be implemented to establish re-vegetation progress</li> <li>- Agree on relevant compensation with land-owners where land used for hunting purposes is impacted.</li> </ul>	Starts at closure, continues for a pre-determined time (as stated in agreements)	Project Manager Site supervisor

Activities	Potential Impact	Management and Mitigation Measures	Action Plan	
			Frequency	Responsible Parties
<ul style="list-style-type: none"> <li>- Backfill the sump once it has dried out (dome to allow for subsidence) and plug borehole (unless an agreement is in place with landowner for alternative uses)</li> <li>- Move drill core trays, ablution facilities, water bowser, stores and drill rig from the site</li> <li>- Dispose of any general waste to a permitted landfill site</li> <li>- Remove temporary fencing</li> </ul>	Waste management	<ul style="list-style-type: none"> <li>- Decommission ablution facilities</li> <li>- Ensure that all waste generated during activities is removed from the site and disposed of appropriately</li> </ul>	Once off	Project Manager Site supervisor
	Land use	<ul style="list-style-type: none"> <li>- Land owners will be invited to carry out site inspections following rehabilitation in order to ensure that it has been carried out suitably.</li> </ul>	Post-closure	Project Manager Site supervisor



### 3 PARTIES RESPONSIBLE FOR THE IMPLEMENTATION OF THE EMP

This section describes the roles and responsibilities for implementing the different parts of the environmental management plan (EMP).

#### 3.1 Recommendations for Compliance Monitoring by the Environmental Officer.

- It is recommended that the Environmental Officer should be appointed by Epangelo to conduct Compliance Monitoring at least twice per year during operations and on completion.

#### 3.2 Supervisor/Environmental Officer

The Supervisor has overall responsibility for environmental management and safety during the operation process of the exploration activities and shall oversee the implementation of the EMP.

The Supervisor's responsibilities relating to compliance with this EMP:

- Regular inspections of compliance to this EMP and any other relevant legal requirements.
- Regular correspondence with the DEA on environmental issues and incidents.
- Conduct environmental awareness training during induction training and on an ad hoc basis thereafter to all workers.
- Ensure compliance to all rules
- Ensure that staff is controlled through the implementation of appropriate security measures.
- Carefully manage the handling of hydrocarbons and other hazardous materials.
- Monitor for excessive dust and noise levels and implement control measures if necessary.
- Report incidences to the DEA.
- Implement a waste management strategy.
- Monitoring and maintenance of equipment and machinery.
- Implement an environmental awareness plan.
- Implementation of first-aid procedures.

### 4 TRAINING AND AWARENESS

The purpose of the job specific environmental awareness training is to ensure that employees/all staff are equipped to implement the actions committed to in the EMP. The staff involved in operations will receive training regarding the requirements of this EMP.

Four main forms of training will be provided on the premises:

- Exploration Activities - induction

- Environmental management training – general and targeted

The training will generally be prepared by the Supervisor (or the Environmental Representative).

The following will be done to ensure all employees, contractors, suppliers and visitors receive the appropriate training/awareness:

#### 4.1 Environmental Induction

All new members of staff receive a corporate Environmental Induction along with the obligatory Health & Safety induction. The induction gives a general overview of the environmental challenges faced by the project, how we are managing them, and general tips for reducing our impact in the workplace.

The main reason for environmental induction is to encourage new staff to be environmentally aware right from the beginning of their employment. This will ensure that environmental initiatives are successful by eliminating bad habits from the start.

Before working on site, all personnel and sub-contractors will undertake an induction incorporating environmental requirements. The induction will address a range of environmental awareness issues specific to the operation process of the project.

As a minimum, training shall include:

- Explanation on the importance of complying with the EMP and environmental implications should the EMP not be effectively implemented.
- Explanation of the rules.
- Discussion of the potential environmental impacts of activities, recognition of environmental risks and how to control these risks.
- The benefits of improved personal performance, understanding of what to do in case of an environmental event or exposure.
- Employees' roles and responsibilities, including emergency preparedness.
- Explanation of the mitigation measures that must be implemented when carrying out operational activities.
- Explanation of the requirements of the EMP and its specification.
- Explanation of the management structure of individuals responsible for matters pertaining to the EMP.

#### 4.2 Environmental Awareness training

Targeted environmental management training will be provided to individuals or groups of workers with a specific authority or responsibility for environmental management or those undertaking an activity with a high risk of environmental impact. This environmental training will aim to achieve a level of awareness

and competence appropriate to their assigned activities. This training will take place at the beginning of operations.

