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**ENVIRONMENTAL IMPACT ASSESSMENT PROCESS FOR HOPE NAMIBIA MINERAL
EXPLORATION (PTY) LTD'S EXPLORATION ACTIVITIES ON EPL 6605, LOCATED EAST
OF THE NAMIB NAUKLUFT NATIONAL PARK – OVERLAPPING THE ERONGO AND
KHOMAS REGIONS**

ENVIRONMENTAL MANAGEMENT PLAN

October 2021

Compiled for:

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APPENDICES

Appendix 1: “Archaeological Guidelines for Exploration & Mining in the Namib Desert” by Dr. John Kinahan.



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EMP

1 INTRODUCTION AND BACKGROUND

Hope Namibia Mineral Exploration (Pty) Ltd holds Exclusive Prospecting Licence (EPL) 6605 which is owned 80% by Hepburn Resources Pty Ltd (a 100% owned subsidiary of Bezant Resources Limited) and 20% by Lovisa Mwandangi Haufiku, a Namibian Citizen. The supervision of the drilling activities on EPL 6605 will be carried out by Bezant. A. Speiser Environmental Consultants cc (ASEC) was appointed by BEZANT to compile an Environmental Management Plan (EMP) for the proposed exploration activities and to audit the implementation and environmental performance of the project.

2 PURPOSE OF THE ENVIRONMENTAL MANAGEMENT PLAN (EMP)

The scope and objectives of the EMP were discussed with BEZANT. The purpose of the EMP is:

- To summarise the project activities that have the potential for adverse environmental impacts.
- To identify and outline the aspects of the environment which require management.
- To compile Project Environmental Specifications for inclusion in contract documents and enforcement on site.
- To set out the roles and responsibilities of all role-players with regard to environmental management.
- To specify rehabilitation requirements.
- To establish monitoring requirements to ensure that all workers on site comply with the Environmental Specifications. The senior geologist on site will be designated by BEZANT to perform this function on a day-to-day basis.

3 ROLES AND RESPONSIBILITIES

The roles and responsibilities between BEZANT, geologists, field technicians, geophysicists, geophysical contractors and the drilling company shall clearly be defined.

Open communication between all parties is important to establish a strong Environmental Awareness Protocol from the beginning of the programme. Only with open communication can a proactive approach be achieved. This approach should ensure that environmental impacts are anticipated and prevented, or minimised, rather than adopting a negative “policing” approach after negative impacts have already occurred.

3.1 BEZANT

BEZANT will allocate a Senior Geologist who will have the following duties and responsibilities:

- Ensure that drill contractors are aware of the EMP.
- Maintain a photographic record of areas before and during exploration activities and after rehabilitation.
- Communication with the landowners (farmers) and adjacent farmers if access via their land is required. The Senior Geologist will inform BEZANT immediately about any disputes/problems to ensure that these can be addressed with the landowner(s).
- Ensure that landowner agreements are in place prior to commencement of any work.
- The Senior Geologist is responsible to record any non-compliance with the EMP, and rectifying actions are to be discussed with BEZANT and ASEC.

3.2 EO and A. Speiser Environmental Consultants (ASEC)

The duties of the Environmental Officer (EO) and ASEC are to conduct the duties of, which includes the following:

- Advise the Senior Geologist regarding implementation and management aspects of the EMP.
- Inspect the drill sites after complaints that the mitigation measures of the EMP are not obeyed or any non-compliance occurred.
- Provide input into access roads to the drill sites, if necessary.
- Inspect the rehabilitation areas after completion of rehabilitation activities. Advise the contractors during rehabilitation.
- Maintain a photographic record of activities relevant to environmental management. This will be carried out on a day-to-day basis by the Senior Geologist.
- Conduct bi-annual audits and compile Bi-annual Environmental Reports, which needs to be submitted to MME and MEFT.

3.3 Drilling Contractor

The duties of the drilling contractor are as follows, should drilling take place:

- Be familiar with the contents of the EMP.
- Ensure that **all** staff and sub-contractors have the EMP explained to him / her to avoid any misunderstandings, e.g. induction session.
- Comply with the EMP.
- Activities not covered in the EMP which may lead to negative environmental impacts shall be discussed with the Senior Geologist prior to commencement.

3.4 Monitoring

The Senior Geologist shall be responsible for monitoring and enforcement of the EMP on a day-to-day basis. Any violation of the EMP shall be recorded and the agreed on measurements are taken, e.g. penalties. The violations are reported to BEZANT and ASEC.

Contractor's queries to avoid / mitigate negative environmental impacts not covered in the EMP will be addressed by ASEC without unreasonable delay.

Bi-annual environmental audit reports to be submitted to MME and MEFT.

4 ENVIRONMENTAL MANAGEMENT PLAN FOR EXPLORATION ACTIVITIES

The **Table** below sets out a summary of the project activities, that have the potential for adverse environmental impacts and the general aspects linked to these activities, which should be addressed prior to any drilling activities to ensure that all exploration team members are aware of the aims set out in the EMP.

ACTIVITY	ASPECT	POTENTIAL ENVIRONMENTAL IMPACT	AFFECTED ENVIRONMENT	MITIGATION MEASURE/RECOMMENDATIONS/EXPLANATION
Exploration activities	Initiation of exploration programme	General behaviour of exploration team in the EPL area.	General area EPL	<ul style="list-style-type: none"> - Establish a strong Environmental Awareness Protocol from the beginning of the programme in order to ensure the least possible damage to the environment. - Provision in the budget is made for Environmental Awareness and training and for internal and external Environmental Monitoring/Auditing costs as well as for rehabilitation costs. - Responsibilities as set out in Chapter 3 are explained and adhered to. - The EMP should be included in all Tender Documents.
Exploration activities	Implementation of the EMP	General behaviour of exploration team and contractors in the EPL area. Destruction of flora, archaeological sites and disturbance of wildlife.	General area EPL	<ul style="list-style-type: none"> - Implement environmental management that is preventative and proactive. Establish the resources, skills, etc. required for effective environmental management. - Senior exploration staff and all senior contractors are aware of, and implementing, EMP requirements. All persons shall therefore be expected to know and understand the objectives of the EMP and will, by example, encourage suitable environmentally sustainable behaviour to be adopted on all sites.

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				<ul style="list-style-type: none"> - Immediate recognition should be given to appropriate environmentally acceptable / sustainable behaviour. Any inappropriate behaviour should be immediately corrected. An explanation as to why the behaviour is unacceptable must be given, and, if necessary, the person could be disciplined, e.g. fees set out, for different non-environmental compliance or not allowed to work on the project anymore.
Exploration activities	Environmental awareness briefing / training	Environmental degradation Disturbance to land owners	Affect landowners	<ul style="list-style-type: none"> - Maintain sound relationships with the landowners and communities impacted by the work. - All required permits are in place, e.g. water abstraction from boreholes. - No littering occurs. - Communicate any environmental incidences/accidents) (i.e. injury or death of animals) with landowners. - Ongoing liaison with the landowners to keep them informed of the planned activities, to ensure there is no interference with their activities. Notify them in advance of planned exploration activities. - Staff will be provided with visible identification and proof that they are working on the Exploration Team.
Exploration activities	Accommodation	Environmental degradation Disturbance to land owners	Affect landowners and environment	<ul style="list-style-type: none"> - Accommodation is discussed and agreed upon with the respective landowner.

ACTIVITY	ASPECT	POTENTIAL ENVIRONMENTAL IMPACT	AFFECTED ENVIRONMENT	MITIGATION MEASURE/RECOMMENDATIONS/EXPLANATION
Appointment of semi-skilled / unskilled workers and skills development	To create jobs for locals and develop their skills	Provide short term job opportunities to the local community	Positive impact on local community	<ul style="list-style-type: none"> - Use locals for the semi-skilled / unskilled work. - Provide opportunities during the drilling programme for the semi-skilled / unskilled workers to develop skills, i.e. drilling, etc., without compromising their safety.
Waste management	Maintain a clean and tidy site / area.	Fauna, general environment, visual impact	Disturbance to fauna. Visual impact (i.e. impacting landowners and tourists)	<p><u>The following waste management procedures shall be implemented:</u></p> <ul style="list-style-type: none"> - Contractors and contractors will be shown the importance of correct waste disposal and minimization through appropriate training; - Minimisation of waste production; - Where possible, compact waste to reduce its bulk; - What is taken in has to be taken out and disposed of at an official waste site; - Hazardous waste (including hydrocarbon contaminated material/soil) is disposed of at a licenced hazardous waste disposal facility (i.e. Walvis Bay or Windhoek hazardous waste site). - Waste containers with suitable lids are provided on site; - Illegal dumping and littering are not to be tolerated. - Any recyclable waste is kept separate and disposed of in Windhoek or Walvis Bay.
Development of Access Roads and Tracks	Avoid and manage disturbance of the general environment	Disturbance of flora Visual impact	General environment	<ul style="list-style-type: none"> - Drill sites and other exploration activities should be sited / conducted on existing or previously established tracks as far as possible. Survey and demarcate roads and tracks that will be needed for activities. - All newly created tracks shall be rehabilitated, if not otherwise agreed with the landowner, after the drill

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				<p>hole has been finalized, e.g. raking the middle 'berm', loosen the compacted ground by manual raking and sweeping.</p> <ul style="list-style-type: none"> - No off-road driving by any vehicle.
Management of drill sites	<p>General disturbance / destruction of Flora</p> <p>General disturbance / destruction of Fauna (organisms and habitat)</p>	<p>Loss of indigenous vegetation</p> <p>Disturbance of fauna</p>	<p>Disturbance of natural environment</p> <p>Farm owner</p>	<ul style="list-style-type: none"> - Impervious rubber / plastic sheeting or oil absorbent mats are to be used to prevent pollution by diesel, oil and other related sources of pollution. - All litter is placed in a container with a lid that is secured against wind. The rubbish is taken to an official waste site. - Soil contaminated by oil or diesel is removed and dumped on an approved dumpsite and the area treated to neutralize hydrocarbon contamination. - The drill sites are clearly demarcated to minimise the disturbed areas around boreholes. - Holes / site are rehabilitated before moving to the next site to minimise vehicle movement to the area. This includes capping of the borehole and ensure that no gaps between the collar and the substrate left behind. - Open water should be fenced off and preferably covered during night to avoid attraction of bees, livestock and wildlife. - Sumps are lined. It is preferred that portable water reservoirs are used and no sumps are dug. - If sumps are used, these need to be fenced in while drying out before rehabilitation. - Smoking (when handling samples or core only after washing hands) may be permitted. An ashtray, e.g. bucket filled with sand at drill sites or small water

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				bottles with some water should be provided to all smokers.
Management of hazardous substances	Spillages of hydrocarbons, lubricants, or possible spills from ablution facilities	Risk of soil pollution by hazardous substances. Risk of hazardous substances affecting the health of all individuals and plant and animal life.	General environment	<ul style="list-style-type: none"> - The Senior Geologist and Contractor have identified all activities that involve the handling of potentially hazardous substances and protocols for the handling of these substances have been put in place and their implementation is supervised. Hazardous substances are handled in accordance with the manufacturer's specifications and existing legal requirements. - The Senior Geologist will encourage the use of the least polluting, most rapidly biodegradable cleaning product, solvent, drill lubricants, etc. - In all areas where there is storage of hazardous substances (i.e. hydrocarbons), there will be containment of possible spillages on impermeable floors and bunded trays that can contain 110% of the volume of the hazardous substances. - All refueling and any maintenance of vehicles will take place with protective measures to ensure no contamination of the surface. - 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. - The Senior Geologist and Contractor will ensure that all individuals, who could be exposed to hazardous substances, are adequately protected (PPE) and

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				<p>educated about the safe and proper Methods for handling of these substances.</p> <ul style="list-style-type: none"> - Procedures for the containment and clean-up of accidental hazardous accidents are developed by the Senior Geologist in accordance to the manufacturer's specifications. - The Senior Geologist or Contractor should immediately implement actions to stop or reduce and contain any spills. - The Senior Geologist arrange and supervise the implementation of the necessary clean-up procedures and proper disposal of contaminated soil, water and other materials at an approved facility. - Clean-up, and dispose of contaminated soil at an official hazardous waste site (i.e. Walvis Bay / Windhoek Hazardous waste site). <p>Any hydrocarbon spills involving 200l and more are reported to the Ministry of Mines and Energy (stipulated in the Petroleum Product Regulations, 2000, Section 49(1)(4)).</p>
Surface & groundwater management	<p>Conservation of water.</p> <p>Avoidance of pollution of any water and presentation of polluted water from entering</p>	Visual Groundwater / stream pollution	General environment	<ul style="list-style-type: none"> - Working areas, where hazardous substances are handled or stored, are designed to collect and contain hazardous substances. Impervious materials are provided, e.g. drip trays, or sumps to collect and contain liquid pollutants. (see "management of hazardous substances") - Provide appropriate toilet facilities (long drop with chloride or lime) for the drilling team on the site. - Water use licenses in terms of the Water Resource Management Act (Act No. 11 of 2013) will be obtained

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	stream channels or underground aquifers.			<ul style="list-style-type: none"> for any new boreholes. - Discuss water availability with farm owners. If not, water needs to be trucked to site. - A compensation agreement will be in place with the landowners. - Groundwater levels will be measured prior to abstraction, during abstraction (daily) and after completion. Levels will be in the Bi-annual Report to MME and MEFT.
Exploration activities	Noise impacts from vehicles, drilling equipment.	Noise disturbance	Land owners and tourists Fauna	<ul style="list-style-type: none"> - Use well maintained drilling equipment. - Discuss tourism activities and access by the exploration team with the farm owners to ensure minimal disturbance.
Exploration activities	Dust generation through using the access track. Air pollution from exhaust fumes. Dust generation through drilling activities	Air quality deterioration. Increase in dust levels (nuisance & health impacts)	Land owners and tourists	<ul style="list-style-type: none"> - Ensure speed limit on gravel roads.
Land use	Disturbance to land owners and tourists by exploration activities	Loss of sense of place to farm owners and tourists (if tourist farm)	Land owners and tourists	<ul style="list-style-type: none"> - Refer to "Site Rehabilitation" - Refer to "Waste Management" - Refer to "Noise"

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Site rehabilitation	To rehabilitate the drill sites and trenches to as close an approximation of the pristine state as is technically, financially and reasonably possible.	Visual impact Tourism activities on farms	General environment	<ul style="list-style-type: none"> - The following rehabilitation actions are to be carried out: - All litter from the site i.e. bottles, tins, piping, etc. are taken to an appropriate disposal site. - All debris, scrap Metal, etc. is removed before moving to a new drill site. - All sumps have been dried and be filled in, if not portable water reservoirs are used. - Tracks must be restored by fine raking and sweeping when exploration activities are complete. It is important that each tyre track be individually swept. If the entire area over the double track is swept it increases the area of impact. - Ensure that no heaps of soil, rocks and material remain – sweep and rake manually before moving to the next drill pad so that the site looks as close to 'pre-operation 'as possible. - Re-cover levelled land with the soil that has been removed. - Clean previous drill sites, trenches, pits from old waste, such as wire, plastic tags, etc. - Target - 5 years after rehabilitation the drill and trench sites are not visible from 500m.
Management of the natural habitat, fauna and flora	To avoid, or reduce, the potential negative impact on the bio-physical environment,	Loss of habitat General disturbance / destruction of Fauna and Flora	General environment	<ul style="list-style-type: none"> - Disturbed areas are kept to a minimum. - No incidents of poaching or illegal plant, bird eggs or reptile collection are reported. (No collection of any plant or parts of a plant are allowed). Offenders will be handed over to the authorities. Employees and contractors will be shown the value of biodiversity and the need to conserve the species and systems that

ACTIVITY	ASPECT	POTENTIAL ENVIRONMENTAL IMPACT	AFFECTED ENVIRONMENT	MITIGATION MEASURE/RECOMMENDATIONS/EXPLANATION
	including the scenic value thereof.			<p>occur within the project area.</p> <ul style="list-style-type: none"> - Domestic or other animals are not brought onto the farms, except if allowed by the landowners. - Efforts should be made to avoid damage to, or destruction of pachycaul species (i.e. species with swollen, moisture-storing trunks and stems), such as <i>Adenium boehmianum</i>, <i>Commiphora saxicola</i>, <i>Commiphora virgata</i>, and <i>Cyphostemma</i> spp., as well as <i>Aloe</i> spp. If any are found at drill sites, then they should be clearly marked and the sites should be adjusted to avoid them. See Appendix B below for images to assist identification of these species. - Collection of wood for fuel must be disallowed. - No collection of any plant or parts of a plant should be allowed. - Any person who causes wilful or malicious damage to the environment will be held responsible for repairing the damage immediately and handed over to the authorities. - No excavations will be left open overnight unless fenced off. - Identify bird nest sites, demarcate them and avoid them.
Exploration activities	Conserving and managing of natural heritage sites & artifacts	Activities could result in possible damage to/destruction of identified	General area EPL	<ul style="list-style-type: none"> - To reduce potential for site disturbance it is recommended that the main group of sites on Schlesien and Niedersachsen should be considered as sensitive and avoided as far as possible in the course of any exploration activities. The group of sites

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		archaeological / heritage resources.		<p>should be given the status of a “No-Go” area and protected by a buffer zone of 1km.</p> <ul style="list-style-type: none"> - The exploration project needs to adopt the “Chance Finds Procedure” set out in Appendix 1. This would help to ensure orderly handling of any buried archaeological material such as human remains that might be exposed in the course of development work. Any recovery of archaeological material found in the course of site development will require a permit from the National Heritage Council.

Appendix 1: “Archaeological Guidelines for Exploration & Mining in the Namib Desert” by Dr. John Kinahan.

Appendix 1: Chance Finds procedure

Areas of proposed development activity are subject to heritage survey and assessment at the planning stage. These surveys are based on surface indications alone, and it is therefore possible that Sites or items of heritage significance will be found in the course of development work. The procedure set out here covers the reporting and management of such finds.

Scope: The “chance finds” procedure covers the actions to be taken from the discovery of a heritage Site or item, to its investigation and assessment by a trained archaeologist or other appropriately qualified person.

Compliance: The “chance finds” procedure is intended to ensure compliance with relevant provisions of the National Heritage Act (27 of 2004), especially Section 55 (4): *“a person who discovers any archaeological ... objectmust as soon as practicable report the discovery to the Council”*. The procedure of reporting set out below must be observed so that heritage remains reported to the NHC are correctly identified in the field.

Responsibility:

Operator	To exercise due caution if archaeological remains are found
Foreman	To secure Site and advise management timeously
Superintendent	To determine safe working boundary and request inspection
Archaeologist	To inspect, identify, advise management, and recover remains

Procedure:

Action by person identifying archaeological or heritage material

- If operating machinery or equipment stop work
- Identify the Site with flag tape
- Determine GPS position if possible
- Report findings to foreman

Action by foreman

- Report findings, Site location and actions taken to superintendent
- Cease any works in immediate vicinity

Action by superintendent

- Visit Site and determine whether work can proceed without damage to findings
- Determine and mark exclusion boundary
- Site location and details to be added to project GIS for field confirmation by archaeologist

Action by archaeologist

- Inspect Site and confirm addition to project GIS
- Advise NHC and request written permission to remove findings from work area

c) Recovery, packaging and labelling of findings for transfer to National Museum

In the event of discovering human remains

a) Actions as above

b) Field inspection by archaeologist to confirm that remains are human

c) Advise and liaise with NHC and Police

d) Recovery of remains and removal to National Museum or National Forensic Laboratory, as directed.