

ENVIRONMENTAL MANAGEMENT PLAN FOR MINERALS EXPLORATION ON AN EXCLUSIVE PROSPECTING LICENSE (EPL) NO. 6134, ||KHARAS REGION



Project Information

Project title	Exclusive Prospecting License (EPL) No. 6134, Kharas Region
Proponent	Geo Namib Minerals cc
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1. AIM OF THE DRAFT ENVIRONMENTAL MANAGEMENT (EMP)

Regulation 8 of the Environmental Management Act (EMA) (7 of 2007) Environmental Assessment Regulations (2012) requires that a draft Environmental Management Plan (EMP) be included as part of the Scoping Environmental Assessment (EA) process. A ‘management plan’ is defined as:

“a plan that describes how activities that may have significant environments effects on the environment are to be mitigated, controlled and monitored.”

An EMP is one of the most important outputs of the EA process as it synthesizes all of the proposed mitigation and monitoring actions, set to a timeline and with specific assigned responsibilities. It provides a link between the impacts identified in the EIA Process and the required environmental management on the ground during project implementation and operation. It is important to note that an EMP is a legally binding document and a person who contravenes the provisions of this EMP may face imprisonment and/or a fine. This EMP is a living document and should be amended to adapt to address project changes and/or environmental conditions and feedback from compliance monitoring.

The purpose of this document is therefore to guide environmental management throughout the different phases of the proposed exploration activities, namely prospecting surveys, drilling, sampling (operation) and decommissioning phases:

- **Operation and maintenance** - This is the phase during operation where the proponent will exploring/prospecting for copper and undertaking related activities on site. It is also the phase during which maintenance of the area, equipment and machinery is done by Aloe Investments 238.

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- **Environmental Monitoring Requirements** - In order to support and ensure that the proposed mitigation measures are achieving the desired results, a monitoring plan must be implemented alongside the mitigation plan.
 - **Decommissioning** – This is the phase during which the exploration activities are ceased. The decommissioning of the exploration operations may be considered due to poor exploration results or declining in the copper market price. During the operational phase and before decommissioning, the Proponent will need to put site rehabilitation measures in place. Where necessary, stockpiling of top soil for rehabilitation at a later stage will be undertaken. Necessary landscaping of exploration areas will be undertaken upon completion of each phase of exploration (drilling, sampling etc.)

The draft EMP will be used by the Proponent and their employees and/or contractors in guiding them during the exploration work to ensure that impacts on the environment are avoided or limited if they cannot be avoided completely.

2. APPOINTED ENVIRONMENTAL ASSESSMENT PRACTITIONER

In order to satisfy the requirements of the EMA and its 2012 EIA Regulations, Geo Namib Minerals cc appointed Candy Consulting cc as an independent consulting company to conduct the required EIA process on their (Proponent's) behalf. The findings of the EIA process are incorporated into this report and the Environmental Management Plan (EMP) which is submitted as part of an application for an ECC to the Environmental Commissioner at the Department of Environmental Affairs (DEA), Ministry of Environment and Tourism (MET).

This document was compiled by Ms. Lilian K. Ondigo, and Mr. Gabriel Joseph, qualified Environmental Assessment Practitioners (EAPs). The details of the Proponent are presented in Table 1 below:

Table 1: Details of the Project Proponent

Full name of Proponent	Contact person & number	Postal Address	ECC Application for
Geo Namib Minerals cc	Mr. Kanime Tuli +264 81 298 9118	P.O.BOX 1642 Windhoek	Mineral exploration activities on Exclusive Prospecting License (EPL) No. 6134, Kharas Region

3. ENVIRONMENTAL ASSESSMENT LEGAL REQUIREMENTS

The content of the EMP must meet the requirements Section 8 (j) of the EIA Regulations. The EMP must address the potential environmental impacts of the proposed activity on the environment throughout the project life-cycle. It must also include a system for assessment of the effectiveness of monitoring and management arrangements after implementation.

Geo Namib Minerals cc therefore has the responsibility to ensure that the proposed activities as well as the EIA process conform to the principles of EMA and must ensure that employees also comply with such principles. Table 2 below lists the requirements of an EMP as stipulated by Section 8 (j) of the EIA Regulations, primarily on specific approvals and permits that may be required for the activities required of EPL 6134.

Table 2: Applicable legal requirements and permits to the activities of EPL 6134

Legislation/Policy/ Guideline	Guideline Relevant Provisions	Implications for this project

<p>Environmental Management Act EMA (No 7 of 2007)</p>	<p>Requires that projects with significant environmental impacts are subject to an environmental assessment process (Section 27). Details principles which are to guide all EAs.</p>	<p>The EMA and its regulations should inform and guide this EA process. Should the ECC be issued to the Proponent, it should be renewed every 3 years, counting from the date of issue.</p> <p>Contact details at the Department of Environmental Affairs (DEA), Ministry of Environment, Forestry and Tourism (MET)</p>
<p>Environmental Impact Assessment (EIA) Regulations GN 28-30 (GG 4878)</p>	<p>Details requirements for public consultation within a given environmental assessment process (GN 30 S21). Details the requirements for what should be included in a Scoping Report (GN 30 S8) and an Assessment Report (GN 30 S15).</p>	<p>Contact person(s) at MET and their details: Mr. Damian Nchindo (Chief and Senior Conservation Scientists and EIA Report Reviewer/evaluator) Tel.: +264 61 284 2717 Email: damian.nchindo@met.gov.na</p>
<p>Minerals (Prospecting and Mining) Act (No. 33 of 1992)</p>	<p>Section 48 (3): In order to enable the Minister to consider any application referred to in section 47 the Minister may (b) require the person concerned by notice in writing to (i) carry out or cause to be carried out such environmental impact studies as may be specified in the notice. Section 54(2): details provisions pertaining to the decommissioning or abandonment of a mine</p>	<p>The Proponent should ensure that all the necessary permits/authorisation for this exploration activities (if any) are obtained from the Ministry of Mines & Energy (MME) Contact person and details at the MME (Mining Commissioner) Mr. Erasmus Shivolo Tel.: +264 61 284 8167 Email: Erasmus.Shivolo@mme.gov.na</p>
<p>Petroleum Products and Energy Act (No. 13 of 1990) Regulations (2001)</p>	<p>Regulation 3(2)(b) states that “No person shall possess [sic] or store any fuel except under authority of a licence or a certificate, excluding a person who possesses or stores such fuel in a quantity of 600 litres or less in any container kept at a place outside a local authority area”</p>	<p>The Proponent should obtain the necessary authorisation from the MME for the storage of fuel onsite. Carlo Mcleod (Ministry of Mines and Energy: Acting Director – Petroleum Affairs) Tel.: +264 61 284 8291</p>

Labour Act 11 of 2007 Health and Safety Regulations (HSR) GN 156/1997 (GG 1617).	Adhere to all applicable provisions of the Labour Act and the Health and Safety regulations.	Division of Labour Service at the Ministry of Labour, Industrial Relations and Employment Creation Tel.: +264 61 206 6111
Forestry Act 12 of 2001, Amended Act 13 of 2005	Prohibits the removal of any vegetation within 100 m from a watercourse (Forestry Act S22 (1)). The Act prohibits the removal of and transport of various protected plant species.	Should there be protected plant species, which are known to occur within the project sites, these are required to be removed and a permit should be obtained from the nearest Forestry office (Ministry of Agriculture, Water & Forestry(MAWF)) prior to removing them. Contact Details at MAWF (Director of Forestry Mr. Joseph Hailwa Tel.: +264 61 208 7663 Email: Joseph.Hailwa@mawf.gov.na
National Heritage Act No. 76 of 1969	Call for the protection and conservation of heritage resources and artefacts.	Should any archaeological material, e.g. bones, old weapons/equipment etc. be found on the exploration sites, work should stop immediately and the National Heritage Council of Namibia must be informed as soon as possible. Contact Details at National Heritage Council of Namibia Mr. Salomon April or Dr. Alma Nankela Tel.: +264 81 244 375

4. EMP LIMITATIONS

This EMP has been drafted with the acknowledgment of the following limitations:

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- This EMP has been drafted based on the Scoping Environmental Assessment (SEA) conducted for prospecting and exploration of limestone in the //Kharas Region. No specialist study was included as part of the environmental assessment.
 - The mitigation measures recommended in this EMP document are based on the risks/impacts in the EIA Report which were identified based on the project description as provided by the Proponent, site investigation and public input. Should the scope of the proposed project change, the risks/impacts will have to be reassessed and mitigation measures provided accordingly.

The following chapter presents the project's roles and responsibilities to be assigned as deemed necessary by the Proponent pertaining to the implementation of this document.

5. EMP ROLES AND RESPONSIBILITIES

The Proponent is ultimately responsible for the implementation of the EMP. Alternatively, the Proponent may delegate this responsibility at any time, as they deem necessary during the project phases. The delegated responsibility for the effective implementation of this EMP will rest on the following key individuals which may be fulfilled by the same person:

Public Relation Officer (PRO): The PRO or PRS will be responsible for the following tasks:

- Liaising between the affected property/land owners and/or occupiers of land and the Proponent.
- Ensure effective communication with stakeholders (affected landowners or occupiers of land), media (if necessary) and the public.
- Organising and overseeing public relations activities.
- Managing public relations issues.
- Preparing and submitting public relations reports, if required.
- Collaborating with personnel and maintaining project-related open communication among personnel.

Exploration Manager (as appropriate): This individual(s) will be responsible for the implementation of the prospecting and exploration program as appointed by the Proponent. The Manager's responsibilities will include:

- Ensure that the relevant commitments contained in the EMP Action Plans are adhered to.
- Setting up and managing the schedule for the day-to-day activities.
- Issuing fines to individuals who contravene EMP provisions and if necessary, removing such individuals from site.
- Ensure relevant staff is trained in procedures.
- Liaison with all relevant interested and affected parties/stakeholders.
- Maintain records of all relevant environmental documentation.
- Undertaking an annual review of the EMP and amending the document when necessary.

Alternatively, the Proponent may delegate an Environmental Officer (ECO) or Safety, Health and Environmental (SHE) Officer from within Geo Namib Minerals cc itself or they may appoint an external ECO to ensure EMP compliance throughout the project life cycle.

Environmental Control Officer (ECO) or Environmental, Health, Safety (SHE) Officer: The Proponent should assign the responsibility of overseeing the implementation of the whole EMP to a designated member of staff or external qualified and experienced person, referred to in this EMP as the Environmental Control Officer (ECO) or SHE Officer.

The ECO will have the following responsibilities:

- Management and facilitation of communication between the Proponent, PR and Interested and Affected Parties (I&APs) with regard to this EMP.
- Conducting site inspections (recommended frequency is monthly during the construction phase and bi-annually for the operation and maintenance) of all areas with respect to the implementation of this EMP (monitor and audit the implementation of the EMP).

- Advising the PR on the removal of person(s) and/or equipment not complying with the provisions of this EMP.
- Making recommendations to the PR with respect to the issuing of fines for contraventions of the EMP.
- Undertaking an annual review of the EMP and recommending additions and/or changes to this document.

5.1 Key Potential Environmental Impacts to be managed

From the assessment conducted, the following key potential negative impacts have been identified per project phase and are summarized in Table 3 below.

Table 3: Summary of key potential environmental impacts per project phase

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

5.2 Aim of the Environmental Management Plan Actions

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.

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:

- Operation (surveys, drilling, sampling...) phase (**Table 4**)
- Monitoring (**Table 5**)
- Decommissioning

The responsible persons at Geo Namib Minerals cc 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.

5.3 Phase 1: Operation (and Maintenance) Phase Management Action Plans

The management action plans recommended for this phase are presented in Table 4 below.

Table 4: Management action plans for the Operation and Maintenance Phase

Environmental Feature	Impact	Management Actions	Responsible person(s) / Implementation responsibility	Timeframe (When?)
EMP training	Lack of EMP awareness and the implications thereof	<ul style="list-style-type: none"> All personnel should be educated about the necessary health, safety and environmental considerations applicable to their respective works. 	ECO / SHE Officer	Prior to site setup activities Ongoing
Monitoring	EMP non-compliance	<ul style="list-style-type: none"> The implementation of this EMP should be monitored. An EMP non-compliance penalty system should be implemented on site 	ECO / SHE Officer	Throughout exploration phase
Communication	Lack of communication (proper liaison) between land/property owners and Proponent with regards to land use	<ul style="list-style-type: none"> A Public Relation Officer (PRO) should be appointed to liaise with the direct or neighbouring landowners affected (overlain) by EPL 6134. The PRO contact details should be provided to the landowners prior to undertaking activities for easy communication during the exploration works. 	Proponent	Pre-exploration activities. Throughout the exploration phase

		<ul style="list-style-type: none"> • A clear communication procedure/plan which includes a grievance mechanism should be compiled. • A formal written agreement between the Proponent and landowners should be prepared before carrying out exploration on these lands. • Continued engagement with landowners / farm owners should be maintained and that grievances are properly addressed. 		
Employment	Labour recruitment	<ul style="list-style-type: none"> • Preference for casual works during operational phase should be given to locals. • No recruitment should be done on site. • Equal opportunities should be given to both men and women 	Human Resources Department	Pre-exploration works
Water Resources Use	Over abstraction leading to the depletion of local aquifer resources	<ul style="list-style-type: none"> • Water reuse/recycling methods should be implemented as far as practicable especially for drilling works. Water used for equipment should be captured and used for the cleaning of equipment if possible. • The Proponent should prioritize the use of reverse circulation (RC) technique as far as possible over diamond drilling which consumes a lot of water. • In the case that the exploration works will mainly rely on diamond 	ECO	Throughout exploration phase

Visual (sense of place)	Visual	<ul style="list-style-type: none"> All the necessary options to improve the aesthetic of the site should be considered and incorporated in the activities of the prospecting and exploration program. 	Exploration Manager ECO / SHE Officer	Throughout exploration phase
Biodiversity	Loss of biodiversity	<ul style="list-style-type: none"> Vegetation found on the site, but not in the targeted areas of exploration should not be removed, but left to preserve biodiversity on the site. Even if a certain shrub or tree is found along drilling and sampling areas on sites, this does not mean that it should be removed. Therefore, care should be taken when exploring for target mineral without destroying the vegetation. Where vegetation clearing and/or damage is unavoidable, permits for clearing protected plant species should be obtained from the nearest Forestry office. Environmental awareness on the importance of biodiversity preservation should be provided to the workers. Personnel should refrain from damaging or cutting down vegetation that is not within exploration site footprints and not necessarily require removal for the exploration activities. The movement of vehicles and machinery should be restricted to existing roads and tracks to prevent unnecessary damage to the vegetation. 	ECO/SHE Officer/ /Exploration Manager; Workers	Throughout exploration phase

		<ul style="list-style-type: none"> No personnel are allowed to, without permission cut down or damage trees belonging to the landowners. 		
Local Services infrastructure	Damage to water pipelines	<ul style="list-style-type: none"> Given the fact that some landowners might have buried services such as pipelines buried on their properties, the PRO should consult with owners to help in locating buried water pipelines on their properties (farms) in order to avoid services damage by heavy trucks. Not only services infrastructure, but some sites on the lands may hold cultural values to the landowners, therefore these sites will need to be earmarked and avoided during exploration. The project personnel should not to leave the land / farms' gates open. Project equipment and machinery should not be left leaning on the farm fences (using the private farm/land fences as support). 	PRO ECO	Throughout the phase
Air Quality	Generation of dust and emissions of hydrocarbons from vehicles may negatively affect the occupational and residential respiratory health	<ul style="list-style-type: none"> Exploration schedule should be limited to between 08h00 and 17h00 in order to keep the vehicle-related dust level minimal in the area. Vehicles and machinery on site should be serviced regularly to prevent emission of harmful gases Vehicles and machinery on site should be serviced regularly to prevent emission of harmful 	Exploration Manager ECO / SHE Officer	Throughout the phase

Waste Generation	General waste	<ul style="list-style-type: none"> Workers should be sensitised to dispose of waste in a responsible manner and not to litter. After each daily works, the Proponent should ensure that there are no waste left at the work site. All domestic and general operational waste produced on a daily basis should be contained until such that time it will be transported to designated waste sites. No waste may be buried or burned on site or anywhere else. The exploration 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 implemented. 		
	Solid waste during exploration operations	<ul style="list-style-type: none"> Provision of animal-proof waste storage containers for storage of waste until disposal at a designated disposal site. Personnel should dispose of waste in a responsible manner and not to litter. The project sites should be equipped with different waste bins for each waste type (except for sewage that will be contained in the provided chemical toilets and/ or periodical type of pit latrine). After each daily works, no waste should be left scattered on sites. 		

		<ul style="list-style-type: none"> No waste may be buried or burned on site or anywhere else throughout the exploration drilling duration. All domestic and general waste produced on a daily basis should be contained until such that time it will be transported to designated waste sites on a weekly basis or as required 		
Health and Safety	Health and safety of the workers associated with exploration activities	<ul style="list-style-type: none"> A comprehensive health and safety plan should be compiled for all exploration drilling activities. All personnel should be trained in/sensitised to the potential health and safety risks associated with their respective jobs. 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, gloves, safety boots, earplugs, safety glasses, etc. No employee should be allowed to drink alcohol prior to and during working hours as this may lead to mishandling of equipment which results into injuries and other health and safety risks. Employees should not be allowed on site if under the influence of alcohol. 	Exploration Manager ECO / SHE Officer	Prior to site setup activities and as required throughout this phase

Health and safety	Accidental fire outbreak	<ul style="list-style-type: none"> • Portable fire extinguishers should be provided on site. • No open fires to be created by exploration personnel 	ECO / SHE Officer	Throughout the phase
Noise	Potential increase in noise levels in the area of operations	<ul style="list-style-type: none"> • During exploration, the operational times should be set such that, no activity is carried out during the night or very early in the mornings. • Exploration drilling activities usually done every day of the week in order to meet exploration deadlines and because of this there will be no limitation to days allocated to this. However, in order to limit the noise from equipment and the movement of vehicles, exploration works should be limited to or only be done between 08h00 and 17h00. • When operating the drilling machinery onsite, workers should be equipped with appropriate personal protective equipment (PPE) such as earplugs to reduce noise exposure. • Machinery and vehicles should be serviced regularly so that they function normally without excessive noise. 	Exploration Manager ECO / SHE Officer	Throughout the phase
Vehicular Safety	The increase in traffic density and slow moving exploration trucks may lead to road accidents	<ul style="list-style-type: none"> • Drivers should drive slowly (40km/hour or less), and on the lookout for local livestock and wildlife • All drivers of the project vehicles should be in possession of valid and appropriate driving licenses to operate such vehicles. • Vehicle drivers should adhere to the road safety rules. 	ECO / SHE Officer	Throughout the phase

		<ul style="list-style-type: none"> • 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. • Vehicle drivers should only make use of designated site access roads provided. • Vehicles drivers should not be allowed to operate vehicles while under the influence of alcohol. • All project related heavy trucks and others vehicles should only be parked within the allocated or designated project site boundaries. 		
Soils	Land Degradation	<ul style="list-style-type: none"> • Spill control preventative measures should be put in place to manage soil contamination, no matter how small the amount of pollution (spill) is. • Site soils should not be disturbed, if not needed or related to the actual exploration works. • Overburden material should be handled more efficiently during exploration operations to avoid erosion when subjected erosional processes. • Prevent the creation of huge piles of waste materials by performing sequential backfilling where possible. 	<p>Exploration Manager</p> <p>ECO / SHE Officer</p>	<p>Throughout the phase</p>

Water and soil pollution	Comprised water quality due to fuel and lubricant spills	<ul style="list-style-type: none"> • Regular inspections and servicing of vehicles and machinery off-site or in designated areas. • Fuels and lubricants must be stored in containers. If stored on the ground, these containers should be placed on a non-permeable surface (e.g. high-density polyethylene plastic sheets). • Polluted soil must be collected and transported away from the site to an approved and appropriately classified hazardous waste treatment facility. • Soil contamination should be minimised by lining the ground with durable plastic where necessary. • Washing of equipment contaminated hydrocarbons, as well as the washing and servicing of vehicles should take place at a dedicated area, where contaminants are prevented from contaminating soil or water resources. • The exploration effluent/wet waste and hydrocarbons should be contained on site in designated containers and disposed of in accordance to municipal wastewater discharge standards, so that they do not reach to local groundwater systems. 	ECO / SHE Officer	Throughout the phase
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		<ul style="list-style-type: none"> • Chemical used for drilling activities (in the drilling mud) should be non- hazardous and biodegradable (Resilient Environmental Solutions, 2019) 		
Poaching of wildlife	Illegal hunting of wildlife (Poaching) by exploration workers	<ul style="list-style-type: none"> • Exploration personnel should not hunt wildlife on and around the project sites. • Site personnel should refrain from killing/poaching or snaring or intentionally disturbing local animals that may be found on and around the exploration sites. • Personnel are not allowed to kill or in any way disturb local livestock. • Any project personnel to be found poaching wildlife in the area should be reported to the nearest Police Station or Anti-Poaching Unit. • The Proponent should work together with the Police and/or the Anti-Poaching Unit in the area to raise awareness on the negative impact of poaching to the local and regional economy. 	Exploration Manager ECO / SHE Officer	Throughout the phase
Archaeology and cultural heritage	Potential disturbance to archaeological and cultural heritage resources	<ul style="list-style-type: none"> • Exploration workers should be informed to not destroy /damage any unknown object found/discovered on site during exploration operations, but to report these objects to the Exploration Manager or ECO who then informs the National Heritage Council of Namibia (NHC). 	Exploration Manager ECO / SHE Officer	Prior to site setup activities. Ongoing observation

		<ul style="list-style-type: none"> • If any archaeological materials are found, the NHC's Chance Find Procedure should be followed. Furthermore, the worksite manager should be notified and all on-site activities stopped immediately until such a time that the NHC / Archaeologist instructs the site personnel to continue with the work on site. • Caution should be exercised when carrying out excavations associated with the exploration activities in the event that archaeological/heritage remains are discovered. 		
HIV and AIDS (Other STIs)	Potential increase of prevalence of HIV and AIDS, as well as other STIs prevalence.	<ul style="list-style-type: none"> • 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. • Provision of condoms and sex education through distribution of pamphlets. These pamphlets can be obtained from local health facilities. 	SHE Officer	During site setup and throughout exploration phase

5.4 Phase 2: Monitoring Phase Management Action Plans

In order to support and ensure that the proposed mitigation measures are achieving the desired results, a monitoring plan must be implemented. The management action plans recommended for exploration work are presented in Table 5 below.

Table 5: Management action plans for the Monitoring Phase

Environmental Feature	Impact	Management Objectives	Actions/Monitoring	Responsible person(s) / Implementation responsibility	Frequency	Threshold	Action if threshold is exceeded
Soils	Loss of top soil	<ul style="list-style-type: none"> All measures should be considered to prevent the loss of top soil 		SHE Officer / Exploration Manager	Weekly	Proliferation of new vehicle tracks	Rehabilitation of affected areas
Monitoring	EMP non-compliance	<ul style="list-style-type: none"> The ECO or the Proponent/Contractor should monitor the implementation of this EMP to ensure compliance. The ECO(s) should inspect the site throughout the exploration period and after completion. 		ECO / SHE Officer	Daily	Increase in health, safety and environmental damage incidence	Daily safety talks, Remedy the consequences
Biodiversity	Loss of biodiversity	<ul style="list-style-type: none"> 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. No equipment should be left leaning on or on top of the site shrubs or trees during and after exploration work 		ECO Workers involved in this phase	Weekly	Vegetation clearance outside of marked areas.	Rehabilitation of affected areas to the satisfaction of the SHE Officer

Health and Safety	Health and safety of the workers	<ul style="list-style-type: none"> • Exploration workers should be trained on how to handle materials and equipment on site (if they do not already know how to) in order to avoid injuries. • Exploration equipment and materials transported to site should be securely fastened to the vehicles (trucks and cars). This is to ensure that the materials and equipment do not fall off the vehicles and cause injuries to anyone while transporting them. • The proponent and ECO/SHE Officer should ensure that all personnel are provided with appropriate personal protective equipment (PPE), such as gloves, safety boots, safety glasses and hard hats at all times during exploration (operation) hours on site to prevent serious injuries or loss of life 	ECO / SHE Officer Workers involved in this phase	Daily/Weekly	Health and safety incident	Remedy the consequences
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		<ul style="list-style-type: none"> No employee should be allowed to drink alcohol prior to and during working hours as this may lead to mishandling of equipment which results into injuries and other health and safety risks. 				
Neighbours to the site	Disturbance	<ul style="list-style-type: none"> Exploration 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. 	ECO Exploration Manager	Weekly	A logged complaint about excessive noise	Revision of site activities
Waste	Environmental Pollution	<ul style="list-style-type: none"> The exploration site should be kept tidy at all times. All domestic and general construction waste produced on a daily basis should be cleaned and contained daily to prevent environmental pollution. Separate waste containers (bins) for hazardous and domestic / general waste must be provided on site to avoid mixing of waste 	ECO/SHE Officer	Daily	Visible littering around project site A logged complaint	Clean-up of the affected areas and ensuring exploration workers utilise waste containers provided.

Transport		<ul style="list-style-type: none"> • Exploration project workers will be transported, in an SUV/ bus (or similar suitable passenger vehicle) to and from site prevent inhaling of dust. 	ECO/ SHE Officer	Daily	A logged complaint about bad form of transport	
HIV and AIDS or STIs infections	Potential increase in HIV and AIDS prevalence	<ul style="list-style-type: none"> • To prevent new infections in the area 	SHE Officer	Monthly		
Vehicular traffic safety	Increase in local traffic flow	<ul style="list-style-type: none"> • All drivers of the project vehicles should be in possession of valid and appropriate driving licenses to operate such vehicles. • 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. • Vehicles drivers should not be allowed to operate vehicles while under the influence of alcohol. 	ECO/ SHE Officer	Weekly	A logged complaint about traffic increase or damage to RA roads	Find alternative access roads for the team. Rehabilitation of affected roads

		<ul style="list-style-type: none">• No heavy trucks or project related vehicles should be parked next to the residents' properties or obstruct the local traffic in any way.				
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5.5 Phase 3: Decommissioning Phase

Decommissioning and rehabilitation will involve the following:

- Capping or backfilling of all drilled holes with loose materials
- Collection and disposal of domestic waste at the nearest solid waste disposal site.
- Levelling of any topsoil stockpiled during exploration activities.
- Any temporary work camps setup should be dismantled, and the area rehabilitated as far as practicable, to their original state.

6. ENVIRONMENTAL MONITORING

In order to reduce the "medium" and maintain the "low" significance ratings of impacts identified and assessed in the EIA report, a bi-annual EMP compliance audit should be undertaken throughout the project cycle. The first bi-annual audit exercise should be done counting 6 months from the date of ECC issuance. Monitoring reports are to be compiled and submitted to the Department of Environmental Affairs (DEA) for archiving. This practice will make the ECC renewal easy when it is about to expire. Therefore, Geo Namib Minerals cc should effectively monitor and submit the reports to the DEA. The submission is not only done for record keeping purposes, but also in compliance with the environmental legislation.

7. CONCLUSIONS

The potential positive and negative impacts stemming from the proposed exploration activities were identified, assessed and mitigation measures made thereof. The mitigation measures recommended in this report and management action plans provided in the draft EMP, can be deemed sufficient to avoid and/or reduce (where impact avoidance impossible) the risks to acceptable levels. Candy Consultancy cc is therefore confident that these measures are sufficient and thus recommends that the Proponent be issued with the Environmental Clearance Certificate (ECC) to enable the exploration works on EPL 6134. However, the ECC should be issued on condition that the provided management measures and action plans are effectively implemented

on site. Most importantly, monitoring of the environmental components described in the impact assessment chapter should be conducted by the Proponent and applicable Competent Authority. This is to ensure that all potential impacts identified in this study and other impacts that might arise during implementation are properly identified in time and addressed. Lastly, should the ECC be issued, the Proponent will be expected to be compliant with the ECC conditions as well as legal requirements governing the mineral exploration and related activities.
