



Submitted to: Navachab Gold Mine (Pty) Ltd.
Attention: Mr George Botshiwe
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Namibia

REPORT:

MINING ACTIVITIES ON ML 180 – COMPLIANCE REPORT

PROJECT NUMBER: ECC-107-301-REP-28-D

REPORT VERSION: REV 01

DATE: 25 OCTOBER 2022

TITLE AND APPROVAL PAGE

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Client Company Name: Navachab Gold Mine (Pty) Ltd.
Client Name: Mr George Botshiwe
Ministry Reference: ECC – 00227 and ECC - 00182
Authors: Environmental Compliance Consultancy
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TERMS AND ABBREVIATIONS

ABBREVIATIONS	DESCRIPTION
AN16	Anomaly 16
BH	borehole
DEA	Directorate of Environmental Affairs
ECC	Environmental Compliance Consultancy
km	kilometre
KMCC	Karibib Mining and Construction Company (Pty) Ltd
LOM	life of mine
MEFT	Ministry of Environment, Forestry and Tourism
MD	mining director
ML	mining licence
MME	Ministry of Mines and Energy
Navachab	QKR Namibia Navachab Gold Mine (Pty) Ltd
OEMP	operational environmental management plan
SSEE	safety, security, environment and emergency department
t	tonnes

1 INTRODUCTION

1.1 COMPANY BACKGROUND

QKR Navachab Gold Mine (Navachab), mainly an open cast operation, started production in 1989. The mine was wholly owned by AngloGold Ashanti Namibia (Pty) Ltd up to 30 June 2014 when shareholding was transferred to QKR and Epangelo Mining. Underground mining activities commenced in the main pit in 2021.

From inception, mining was done by a contractor, Karibib Mining and Construction Company (KMCC) (Pty) Ltd, and went to owner-mining in January 2004. A mining contractor, Lewcor, did the bulk of the mining operations between 2011 and 2017. As from 2018 Anomaly 16 (AN16) was being mined by a contractor, EVS Mining Contractors (Pty) Ltd, while the main pit and Gecko satellite operations are owner mined.

QKR Namibia Navachab Gold Mine (Pty) Ltd holds mining licence (ML) 180.

Environmental Compliance Consultancy (ECC) has been engaged by Navachab, referred to hereinafter as the Proponent, to prepare the application to renew the environmental clearance certificate. The Proponent currently holds a valid environmental clearance certificate for mining activities on ML 180, for which a renewal is being applied. As part of this application, an environmental compliance desktop audit has been undertaken to determine the status of compliance with the environmental management plan. Additionally, information from monthly compliance inspections and/or audits by ECC staff are incorporated into the audit assessment findings.

Navachab is located near the town of Karibib in Namibia. Karibib is situated approximately 170 km northwest of Windhoek, the capital of Namibia (Figure 1). The locations of MLL 180 is depicted in Figure 2.

ECC has compiled an operational environmental management plan (OEMP) (Appendix C) in terms of the Environmental Management Act (EMA), No.7 of 2007 and its regulations of 2012 for Navachab's activities. Environmental compliance for EPL activities forms part of this OEMP. Specifically the domain for open pit mining activities (Domain 3), has been used for this assessment.

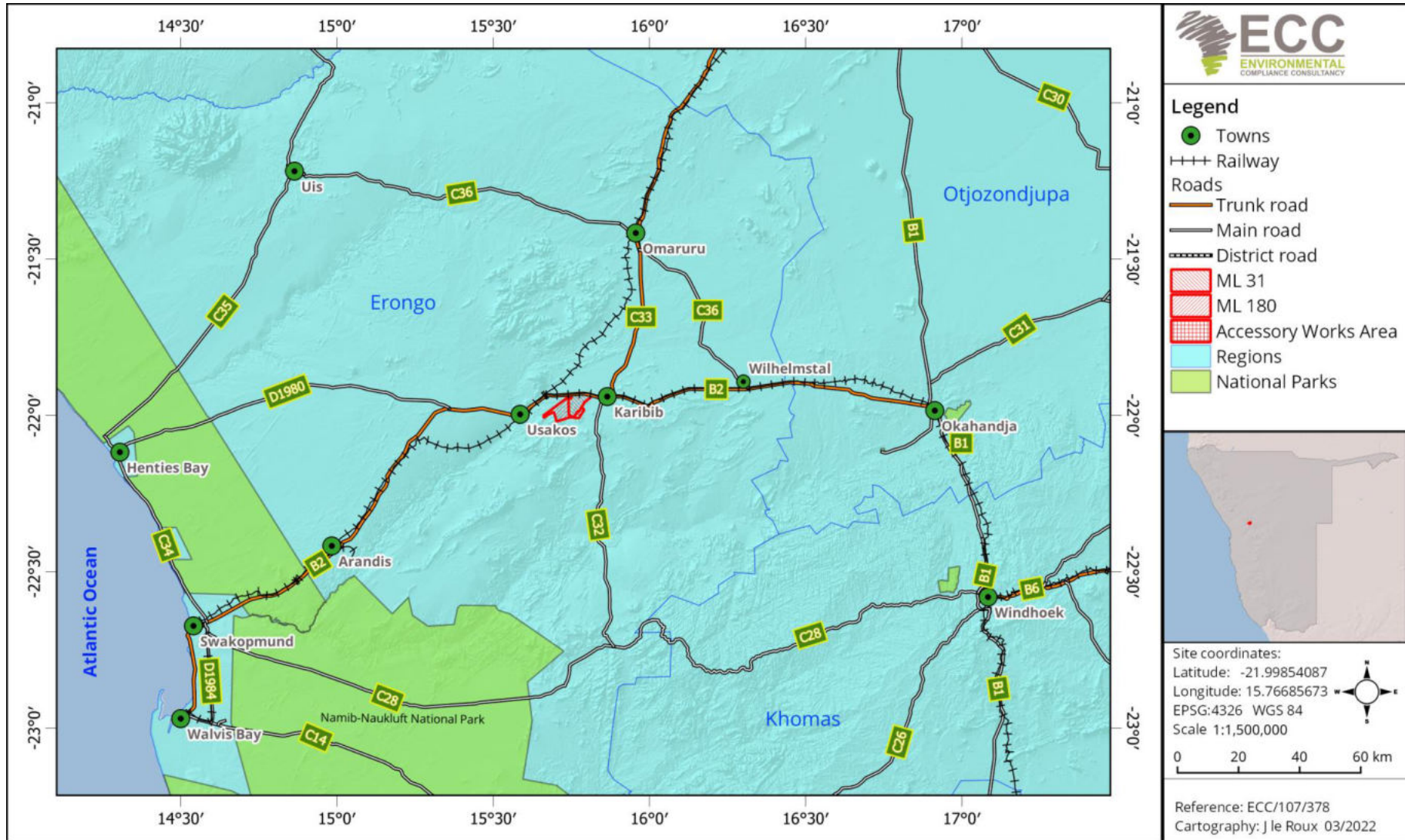


Figure 1 – Locality map showing the location of Navachab Gold Mine

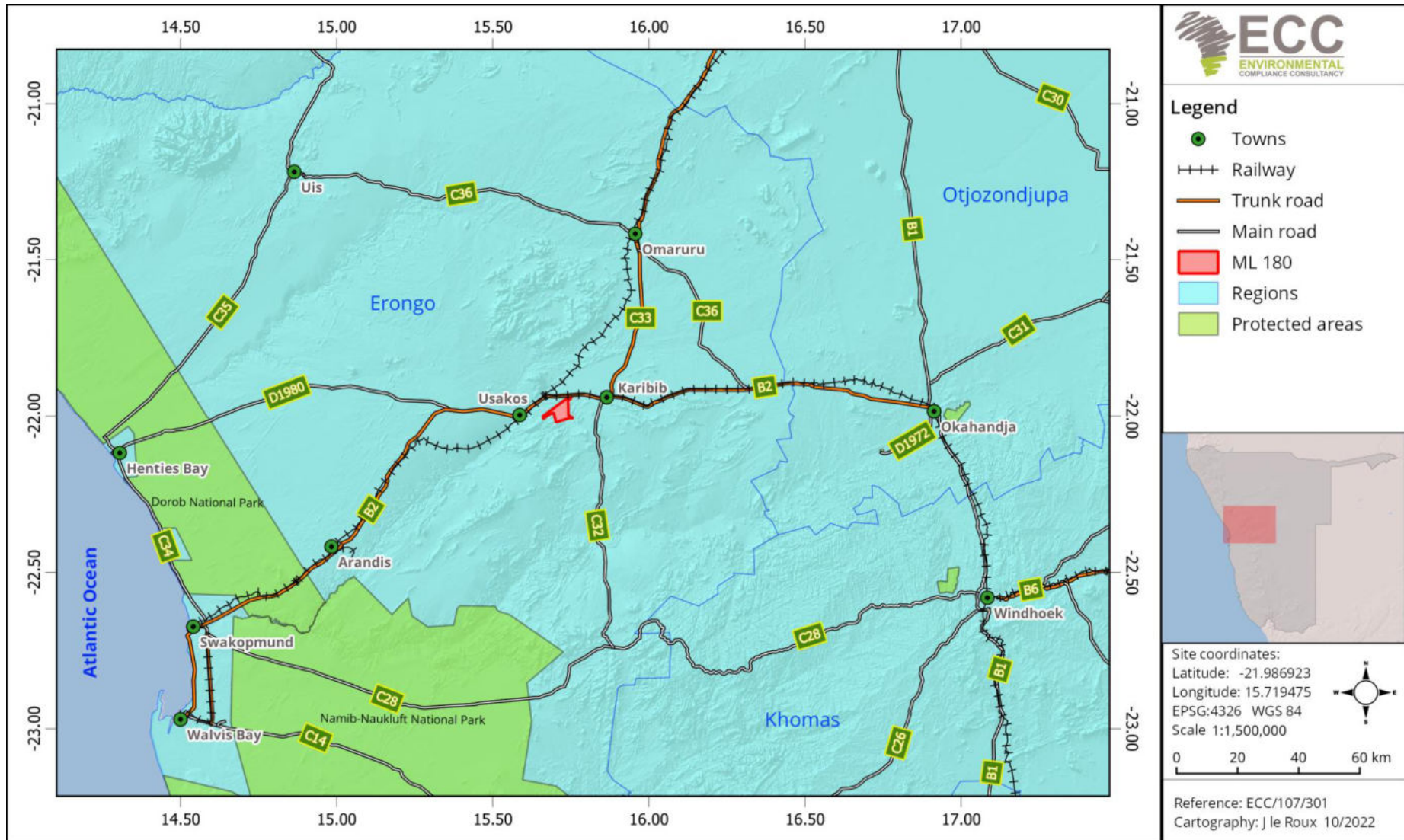


Figure 2 – Locality map showing the location of ML 180

1.2 THE PROPONENT OF THE PROPOSED PROJECT

QKR Namibia Navachab Gold Mine (Pty) Ltd is the Proponent for the project. The Proponents' details are provided in Table 1.

Table 1 – Proponents details

Company Representative:	Contact Details:
Mr George Botshiwe Managing Director (MD)	PO Box 150 Karibib Namibia George.Botshiwe@navachab.com.na +264 (64) 555 2012

1.3 ENVIRONMENTAL ASSESSMENT PRACTITIONER

Environmental Compliance Consultancy (ECC) (Reg. No. CC 2013/11401) has prepared this renewal report and on behalf of the Proponent.

This report has been authored by employees of ECC, who have no material interest in the outcome of this report, nor do any of the ECC team have any interest that could be reasonably regarded as being capable of affecting their independence in the preparation of this report. ECC is independent from the proponent and has no vested or financial interest in the project, except for fair remuneration for professional fees rendered based upon agreed commercial rates. Payment of these fees is in no way contingent on the results of this report or the assessment, or a record of decision issued by Government. No member or employee of ECC is, or is intending to be, a director, officer, or any other direct employee of Navachab Gold Mine. No member or employee of ECC has, or has had, any shareholding in Navachab Gold Mine.

All compliance and regulatory requirements regarding this report should be forwarded by email or posted to the following address:

Environmental Compliance Consultancy
PO Box 91193, Klein Windhoek, Namibia
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1.4 PURPOSE OF REPORT

The purpose of this report is to document the findings of a desktop environmental compliance audit, which accompanies the renewal application for the environmental clearance certificate for ML 180 (referred to as Anomaly 16 open pit mining area). Additionally, information from monthly compliance inspections and/or audits by ECC staff are incorporated into the audit assessment.

The approved OEMP for the existing environmental clearance certificate is audited to monitor the proceeds of the operation and ensure that all measures stipulated in the document are met and effectively adhered to, as required by the Department of Environmental Affairs (DEA). In an event where the mining activities are altered, the OEMP is required to be revised and amended accordingly. As Navachab is an operational mining site, activities in the AN16 mining area are routinely monitored, inspected and audited by the mine's Safety, Security, Environment and Emergency (SSEE) Department. ECC provides support and conducts monthly inspections and/or audits of the operational activities, which includes when required compliance of ML 180.

As per the Environmental Management Act, No. 7 of 2007 and its EIA Regulations of 2012, mining activities on ML 180 cannot be undertaken without a valid environmental clearance certificate. The mining activities at ML 180 proposes to mine through open pit mining techniques precious metals in the AN16 mining area. The integrated mine closure plan for Navachab is currently being developed and rehabilitation to the determined closure objectives will need to be adhered to.

2 BACKGROUND TO ML 180

ML 180 was granted to QKR Namibia Navachab Gold Mine (Pty) Ltd company on the 29 February 2016 by the Ministry of Mines and Energy (MME). An environmental clearance certificate was issued to by the Ministry of Environment, Forestry and Tourism (MEFT) on the 01 December 2016.

ML 180 is located close to Karibib, on respective farms, namely Navachab Farm 38 and Kranzberg Farm 59. ML 180 is 3480.8155 hectares in size. The Proponent intends to continue with mining activities on the mining licence ML 180 for precious metals.

2.1 RENEWAL ACTIVITIES

As part of the operational mining programme, the following activities are envisaged:

- Determine rehabilitation requirements for AN16, in line with mine closure plan
- Open pit load and haul if required
- Waste rock dump stockpile establishment and management if required
- Ore stockpile establishment and management if required
- Dust suppression
- Maintenance of haul roads and access roads

2.2 SITE ACTIVITIES

3.1.1. Annual monitoring

An environmental report is submitted to the Ministry of Environment, Forestry and Tourism annually reporting on periods from 01 March of the previous year to 31 March in the current year. These reports report on compliance with regards to the activities taking place on-site. These reports are provided as Appendix B.

3.1.2 Activities for the monitoring period

Work carried out during the reporting period on ML 180 includes the following;

- Operations continued with mining activities from Anomaly 16, a satellite operation. In 2021, total tonnes mined at AN16 was 861,206.92t, of which 322,707.08t was ore. The required ore was mined out by July 2021, with the pit reaching its life of mine (LOM).

2.3 ANNUAL COMPLIANCE AUDIT

Furthermore, the approved OEMP covers all adverse environmental impacts, including any additional potential impacts that may result from mining activities on ML 180. The OEMP and

on site operational procedures provides the technical details for each mitigation, monitoring and institutional measure, including the impact(s) to which it relates and the conditions when required, together with designs, equipment descriptions and operating procedures as granted.

2.4 COMPLIANCE AUDIT FINDINGS

This section outlines the findings of the environmental audit completed for AN16 within ML 180. It addresses obligations in terms of the key Acts that govern the activities on site, the commitments made in the OEMP and/or related procedures, and present the findings and recommended corrective actions where applicable (Table 2).

The OEMP and operational procedures:

- Identifies all mining operational activities that could cause environmental damage (risks and potential impacts) and provides a summary of actions required;
- Identifies institutions responsible for ensuring compliance with the OEMP and provides their contact information;
- Provides standard procedures to avoid, minimise and mitigate the identified negative environmental impacts and to enhance the positive impact of the proposed activities on the environment;
- Provides for site and exploration rules and actions required;
- Forms a written record of procedures, responsibilities, requirements and rules for contractor/s, their staff and any other person who must comply with the OEMP;
- Ensure zero pollution incidents; minimal vegetation clearing and earthworks, protect local flora, fauna, and water resources; and use water and other natural resources effectively and efficiently.
- Provides a monitoring and auditing programme to track and record compliance and identify and respond to any potential or actual negative environmental impacts, and
- Provides a monitoring programme to record any mitigation measures that are implemented.
- Ensure that an annual environmental audit is carried out by Navachab SSEE department and an independent third party.
- Once exploration has ceased, any impacts shall be rehabilitated.

2.5 ISSUES OF NON-COMPLIANCE

No issues of non-compliance were identified. The stormwater plan is required to be reviewed and updated, which is currently being determined by Navachab management.

Table 2 - OEMP Domain 3 (open pits) Audit

Activity	Potential Impacts	Management/Mitigation Measures	Compliance	Comments
Training and awareness	<ul style="list-style-type: none"> - Lack of environmental knowledge on EMP requirements leads to environmental incidents 	<ul style="list-style-type: none"> - Environmental department to provide weekly information regarding environmental issues of concern; - Line management to discuss topics with teams; - SHE Representatives will be employed by contractor staff to brief staff on their company SHE topics and those of Navachab; - Awareness will be distributed by various channels as deemed appropriate; - Daily site inspections to ensure SHE requirements are adhered to; - SHE files to be maintained per shift as per Navachab requirements; and - Incident reports covering SSEE to be included, including lessons learned and corrective actions. 	- Compliant	<ul style="list-style-type: none"> - Active induction, awareness and training programme in place. - The Proponent will continue to ensure mitigation measures are in place as per the OEMP.
Potable water	<ul style="list-style-type: none"> - No availability of potable water at Anomaly 16 satellite pit 	<ul style="list-style-type: none"> - Potable water can be sourced from AN BH and will supply the contractor workshops facilities; 	- Compliant	<ul style="list-style-type: none"> - As mining activities are not active in AN16, no water is required to be sourced for drinking water. AN BH is

Activity	Potential Impacts	Management/Mitigation Measures	Compliance	Comments
		<ul style="list-style-type: none"> - A pump, flow meter and storage facilities for water to be in place before use; - The Environmental department will record monthly meter readings to be reported to DWA, as per permit conditions; and - The Environmental department will conduct water quality chemical analysis of the borehole water on a monthly basis or as defined in the monitoring programme. 		<p>however analysed for water quality on a regular basis by the SSEE department.</p> <ul style="list-style-type: none"> - The Proponent will continue to ensure mitigation measures are in place as per the OEMP.
	<ul style="list-style-type: none"> - Lack of potable water supply 	<ul style="list-style-type: none"> - In remote working areas in the pit, with the changing work environments, potable water cannot be sourced through related infrastructure and employees should take water with them in canisters from the offices or change houses; and - Routine monthly potable water quality testing will be conducted at supplied water sources. 	<ul style="list-style-type: none"> - Compliant 	<ul style="list-style-type: none"> - The Proponent will continue to ensure mitigation measures are in place as per the OEMP.
Soils management	<ul style="list-style-type: none"> - Disturbance footprint management 	<ul style="list-style-type: none"> - Only designated surface roads, haul roads or paved areas will be utilized; - Boundary berms to be constructed, where required; and - Topsoil to be removed, where feasible. 	<ul style="list-style-type: none"> - Compliant 	<ul style="list-style-type: none"> - The Proponent will continue to ensure mitigation measures are in place as per the OEMP.

Activity	Potential Impacts	Management/Mitigation Measures	Compliance	Comments
Domestic effluent water management	<ul style="list-style-type: none"> - Lack of appropriate ablution facilities can result in soil contamination and pollution 	<ul style="list-style-type: none"> - Only approved ablution facilities to be utilized; - If additional ablution facilities are required, the Environmental department to be informed; - Ablution facilities must be easily accessible for employees, onsite security and contractors to use in remote working areas; - No employee or contractor on Navachab site may relieve themselves in the surrounding environment and work area; - Ablution facilities to be cleaned and maintained on a regular basis; - Effluent water to be contained and spills to be cleaned up within 24 hours of the incident occurring; - Sewage facilities to be permitted with DWA; - Septic tanks to be pumped out on a regular basis to avoid overflows; - Grey water to be separated from effluent water and be reused; and 	- Compliant	<ul style="list-style-type: none"> - The Proponent will continue to ensure mitigation measures are in place as per the OEMP.

Activity	Potential Impacts	Management/Mitigation Measures	Compliance	Comments
		<ul style="list-style-type: none"> Regular effluent water quality samples to be taken by the Environmental department. 		
Waste management (non mineralised)	<ul style="list-style-type: none"> Littering and pollution of soils/groundwater 	<ul style="list-style-type: none"> Litter generated during shift must be collected in plastic bags and/or stored directly in the waste receptors provided; Waste must be separated at source as per the waste management procedure in the correct colour coded bins and/or skips; Waste receptacles can be supplied on request to the Environmental department; Bins and skips must have lids, that can seal and are scavenger/baboon proof; No waste may be burnt or buried on site; No fires will be allowed on site, unless in approved designated areas allowed by the SSEE manager; Domestic waste is disposed of weekly at the non mineralized waste site; Scrap metal to be collected in dedicated banded areas and the Environmental department informed when collection is required; 	<ul style="list-style-type: none"> Compliant 	<ul style="list-style-type: none"> The Proponent will continue to ensure mitigation measures are in place as per the OEMP. Sufficient waste receptacles available on site.

Activity	Potential Impacts	Management/Mitigation Measures	Compliance	Comments
		<ul style="list-style-type: none"> - Hazardous waste created including empty containers, hydraulic pipes, oil filters (etc.) should be removed from site and disposed of at a suitable registered hazardous waste facility; and - A copy of the safe disposal of these wastes to be maintained as a record on file and provided to the Environmental department on request. 		
Hydrocarbon management	<ul style="list-style-type: none"> - Incorrect hydrocarbon management can lead to soil and groundwater contamination or injury/mortality to fauna and flora 	<ul style="list-style-type: none"> - Sufficient drip trays should be made available to capture leaks and prevent pollution from mining fleet; - Spill kits and spill absorbent treatment material to be present in the pit area for quick reaction times to handle small and large spills; - Incident reports to be compiled for each spill event as per the incident management procedure; and - Soils to be treated <i>in situ</i> and where this is not possible, soils to be removed to the bioremediation facility for further treatment. 	- Compliant	<ul style="list-style-type: none"> - The Proponent will continue to ensure mitigation measures are in place as per the OEMP.

Activity	Potential Impacts	Management/Mitigation Measures	Compliance	Comments
Air quality	<ul style="list-style-type: none"> - Air pollution and dust emissions through vehicle emissions 	<ul style="list-style-type: none"> - Diesel exhaust fumes/emissions from heavy machinery on site (excavators, front end loaders and haul trucks) must be controlled and minimized by regular checks and servicing of vehicles; - Any mining or construction vehicle found to be emitting excessive smoke or hydrocarbon spillage will be stopped from operating until found to be mechanically sound; - Blasting should be conducted during period of atmospheric instability or as per the blasting regulations to allow for maximum dispersion of dust that has been created; - Fall out dust, PM_{10/2.5} and passive gases monitoring campaigns to be conducted in and around the open pits; - Adherence to speed limits on unpaved roads and surfaces; - Regular dust suppression through chemical binding agents and watering of roads, surfaces and stockpiles; 	- Compliant	<ul style="list-style-type: none"> - Currently only fall out dust is monitored in ML 180, however as mining operations are not active, this is deemed sufficient. - The Proponent will continue to ensure mitigation measures are in place as per the OEMP.

Activity	Potential Impacts	Management/Mitigation Measures	Compliance	Comments
		<ul style="list-style-type: none"> – Additionally, goosenecks to be established where required; and – Alternate plans need to be in place for dust suppression as mining activities will be stopped if dust levels become too high. 		
Noise management	<ul style="list-style-type: none"> – Disturbance to third parties, fauna and flora 	<ul style="list-style-type: none"> – Regular noise and vibration monitoring to be conducted on the neighbouring farm, Mon Repos; – To limit disturbance to the farmer, hauling of material from Anomaly 16 pit to the main mining areas/ROM, should take place during daylight hours as far as possible; and – If nighttime hauling is required, the neighbour needs to be consulted. 	– Compliant	<ul style="list-style-type: none"> – The Proponent will continue to ensure mitigation measures are in place as per the OEMP. – No complaints received for the AN16 mining area.
Power generation	<ul style="list-style-type: none"> – Incorrect supply and storage of power generators results in reduced mining operations and/or soil/groundwater contamination 	<ul style="list-style-type: none"> – Power generation will be done using diesel generators, where required; – Lighting plants are expected to be used at night or during poor visibility; – All generators and diesel storage tanks must be contained within bund walls with a sufficient capacity (110 %) contained volume; and 	– Compliant	<ul style="list-style-type: none"> – The Proponent will continue to ensure mitigation measures are in place as per the OEMP.

Activity	Potential Impacts	Management/Mitigation Measures	Compliance	Comments
		<ul style="list-style-type: none"> Records of diesel supplied to be maintained. 		
Heritage sites	<ul style="list-style-type: none"> Loss or damage to heritage sites 	<ul style="list-style-type: none"> Chance finds to be reported to the Environmental department in line with the Chance Finds Procedure; and No authorized removal or damage to artefacts is allowed. 	<ul style="list-style-type: none"> Compliant 	<ul style="list-style-type: none"> The Proponent will continue to ensure mitigation measures are in place as per the OEMP.
Biodiversity	<ul style="list-style-type: none"> Protection of fauna and flora to avoid damages, injuries and/or mortalities 	<ul style="list-style-type: none"> Protected tree species to be identified clearly and uprooting of trees to be avoided, where possible; Seed and sample collection to be done for future rehabilitation purposes; No firewood collection is allowed; No large tree in the Kachab river may be uprooted for haul road construction; Wherever large trees are encountered that are in the way, the road should be designed around them although limited trimming of branches with a chainsaw can be done; Permits to be acquired from MEFT if protected trees are to be removed and/or relocated; 	<ul style="list-style-type: none"> Compliant 	<ul style="list-style-type: none"> The Proponent will continue to ensure mitigation measures are in place as per the OEMP.

Activity	Potential Impacts	Management/Mitigation Measures	Compliance	Comments
		<ul style="list-style-type: none"> - No hunting or poaching is allowed on Navachab farm; - No authorized removal of vegetation is allowed; - Baboons are pests and therefore require specific management, no feeding should be allowed; - Fauna and flora incidents to be reported and recorded as per the incident management procedure; - Leopard, cheetah and hyena occur in the area and can be discouraged by making loud noises, such as hooting; - Briefings on snakes and snake bite first aid treatments will be conducted; - Non-venomous snakes like mole snakes and egg eaters should be captured into a container and removed from site; - The killing of venomous snakes is not encouraged (e.g. mamba, puff adder and zebra snakes); - Boa constrictors should under no circumstances be harmed or killed as they are protected by law; and 		

Activity	Potential Impacts	Management/Mitigation Measures	Compliance	Comments
		<ul style="list-style-type: none"> Contact the Environmental department to remove the snake should it be within the mining or construction area. 		
	<ul style="list-style-type: none"> Conservation of fountains, springs and rivers not maintained 	<ul style="list-style-type: none"> No pumping from fountains/springs is allowed, especially in the Kachab river; Avoid general disturbance to this area; No soils to be collected from the rivers; and The river should not be used as a general access route. 	<ul style="list-style-type: none"> Compliant 	<ul style="list-style-type: none"> The Proponent will continue to ensure mitigation measures are in place as per the OEMP.
Groundwater	<ul style="list-style-type: none"> Groundwater passive inflow into pits causing geotechnical instability 	<ul style="list-style-type: none"> The groundwater passive inflows increase during mining, reaching a peak of 308 m³/day, towards the end of mining. It is estimated that the predicted inflows can easily be handled by sump pumping, and active dewatering boreholes are not specifically required, unless geotechnical studies show critical geotechnical domains, where depressurisation may be needed; Pit dewatering water is either used for dust suppression or released to an ephemeral water course, in line with permit conditions; 	<ul style="list-style-type: none"> Compliant 	<ul style="list-style-type: none"> The Proponent will continue to ensure mitigation measures are in place as per the OEMP. The groundwater model is currently being updated (2022).

Activity	Potential Impacts	Management/Mitigation Measures	Compliance	Comments
		<ul style="list-style-type: none"> - Volumes of water abstracted is recorded and reported to DWA, in line with permit conditions; and - Annual updating of groundwater model recommended. 		
Housekeeping	<ul style="list-style-type: none"> - Littering and soil/groundwater pollution 	<ul style="list-style-type: none"> - Each employee or contractor is responsible for housekeeping in their work areas; - The pit areas and surrounds to be kept clean and maintained in a clean, orderly and presentable condition at all times; and - The various pits to be inspected on a monthly basis by the relevant supervisor, line manager and/or manager. 	- Compliant	<ul style="list-style-type: none"> - The Proponent will continue to ensure mitigation measures are in place as per the OEMP.
Stormwater management	<ul style="list-style-type: none"> - Flood risks to the AN16 central pit and pollution control 	<ul style="list-style-type: none"> - Various stormwater control options have been recommended and shall be implemented or alternatively a new stormwater control plan to be developed based on updated topographical and hydrological information; - Unlined containment dam and over-pumping, either around the pit to discharge to the C5 catchment 	- Partial	<ul style="list-style-type: none"> - The stormwater management plan is currently being reviewed to be updated, this will only be finalized in 2023.

Activity	Potential Impacts	Management/Mitigation Measures	Compliance	Comments
		<p>downstream and from there to the Kachab River approximately 800 m downstream, or directly eastward to join the Kachab River approximately 750 m upstream of the original confluence;</p> <ul style="list-style-type: none"> - Unlined containment dam and no pumping, with water lost by evaporation and /or infiltration; - Unlined attenuation dam and conveyance via a channel within one of the pit benches, if elevations allow; - Diversion to another watercourse, most likely the Kachab river (with or without attenuation storage); - Collection within the pit and re-use; - If contact water from the PCP footprint enters the pit as run off, then this water is deemed dirty water and cannot be released into the natural environment; - For the AN16 central pit the peak inflow into a storage dam is calculated to be less than 25 m³/s for the 1:50 year flood. A dam storage volume of approximately 60 000 m³ would be recommended; and 		

Activity	Potential Impacts	Management/Mitigation Measures	Compliance	Comments
		<ul style="list-style-type: none"> The diversion channel should be a simple unlined trapezoidal channel. 		
	<ul style="list-style-type: none"> Contact stormwater not contained leading to pollution 	<ul style="list-style-type: none"> Sumps to collect storm water that collects in the pits. 	<ul style="list-style-type: none"> Compliant 	<ul style="list-style-type: none"> The Proponent will continue to ensure mitigation measures are in place as per the OEMP.
Geotechnical	<ul style="list-style-type: none"> Pit wall stability failures due to elevated pore pressure 	<ul style="list-style-type: none"> The open pits will continue to be regularly inspected by geotechnical engineers; Pore pressures will be monitored on an ongoing basis utilising a series of piezometers located around the pit; and The need to install an active dewatering system to depressurize the pit walls will be considered as the pit deepens. 	<ul style="list-style-type: none"> Compliant 	<ul style="list-style-type: none"> Regular geotechnical inspections are conducted by mining geological staff. The Proponent will continue to ensure mitigation measures are in place as per the OEMP.

3 CONCLUSION AND RECOMMENDATIONS

All proposed activities shall be carried out in compliance with the relevant requirements and conditions of the granted licence in accordance with the approved OEMP and procedures. 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 the project activities progress. Once the mine closure plan has been updated and finalised, work will commence to review and implement the requirements for this plan for AN16.

APPENDIX A - ENVIRONMENTAL CLEARANCE CERTIFICATE ML 180

ECC – 00227

Serial: np2141227
20/10/2019
D. Müller
08-1462610
A. Müller



REPUBLIC OF NAMIBIA
MINISTRY OF ENVIRONMENT AND TOURISM
OFFICE OF THE ENVIRONMENTAL COMMISSIONER

ENVIRONMENTAL CLEARANCE CERTIFICATE
ISSUED

In accordance with Section 37(2) of the Environmental
Management Act (Act No. 7 of 2007)

TO

Navachab Gold Mine
Navachab Gold Mine, PO Box 150, Karibib, Namibia, Farm 58.

TO UNDERTAKE THE FOLLOWING LISTED ACTIVITY

Exploration & Mining of Precious metals at EPL999 & ML180 (Anomaly
16) ,Erongo Region,



DEPUTY ENVIRONMENTAL COMMISSIONER

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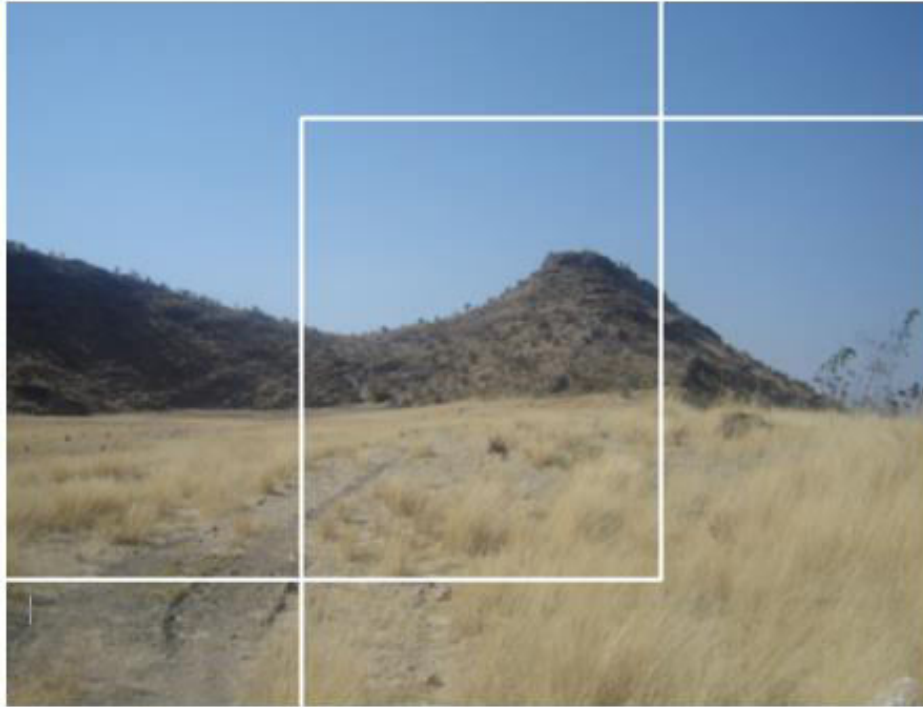
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CONDITIONS OF APPROVAL

1. This environmental clearance is valid for a period of 3 (three) years, from the date of issue unless withdrawn by this office
2. This certificate does not in any way hold the Ministry of Environment and Tourism accountable for misleading information, nor any adverse effects that may arise from these activities. Instead, full accountability rests with the proponent and its consultants
3. This Ministry reserves the right to attach further legislative and regulatory conditions during the operational phase of the project
- 4.

APPENDIX B – ANNUAL REPORTS 2019 – 2022

APPENDIX C – OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN



Submitted to: ~~Navachab~~ Gold Mine (Pty) Ltd
Attention: Mr George ~~Boisbouk~~
Farm 58 ~~Jauchib~~
PO Box 150
~~Jauchib~~
Namibia

REPORT:

NAVACHAB GOLD MINE – OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN

PROJECT NUMBER: ECC-107-408-REP-02-D
REPORT VERSION: FINAL FOR GRN SUBMISSION
DATE: 25 AUGUST 2022

Prepared by: 



Submitted to: Navachab Gold Mine (Pty) Ltd.
Attention: Mr George Botshiwe
Farm 58 Karibib
PO Box 150
Karibib
Namibia

REPORT:

EXPLORATION ACTIVITIES ON EPL 999 AND EPL 3275 – COMPLIANCE REPORT

PROJECT NUMBER: ECC-107-301-REP-27-D

REPORT VERSION: REV 01

DATE: 25 OCTOBER 2022

TITLE AND APPROVAL PAGE

Project Name: Exploration Activities on EPL 999 and EPL 3275 – Compliance Report
Client Company Name: Navachab Gold Mine (Pty) Ltd.
Client Name: Mr George Botshiwe
Ministry Reference: ECC – 00227 and ECC - 00182
Authors: Environmental Compliance Consultancy
Status of Report: Final for Government submission
Project Number: ECC-107-301-REP-27-D
Date of issue: 25 October 2022
Review Period NA

ENVIRONMENTAL COMPLIANCE CONSULTANCY CONTACT DETAILS:

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TERMS AND ABBREVIATIONS

ABBREVIATIONS	DESCRIPTION
AN16	Anomaly 16
DEA	Directorate of Environmental Affairs
ECC	Environmental Compliance Consultancy
EIA	environmental impact assessment
EPL	exclusive prospecting licence
HME	heavy mobile equipment
km	kilometre
KMCC	Karibib Mining and Construction Company (Pty) Ltd
MEFT	Ministry of Environment, Forestry and Tourism
MD	mining director
MME	Ministry of Mines and Energy
Navachab	QKR Namibia Navachab Gold Mine
OEMP	operational environmental management plan
RC	reverse circulation
SSEE	safety, security, environment and emergency department

1 INTRODUCTION

1.1 COMPANY BACKGROUND

QKR Navachab Gold Mine (Navachab), mainly an open cast operation, started production in 1989. The mine was wholly owned by AngloGold Ashanti Namibia (Pty) Ltd up to 30 June 2014 when shareholding was transferred to QKR and Epangelo Mining. Underground mining activities commenced in the main pit in 2021. Regional exploration activities are ongoing as the company seeks to extend its mine life and expand its ore reserves.

QKR Namibia Navachab Gold Mine (Pty) Ltd holds exclusive prospecting licence(s) (EPL) 999 and 3275.

Environmental Compliance Consultancy (ECC) has been engaged by Navachab, referred to hereinafter as the Proponent, to prepare the application to renew the environmental clearance certificates. The Proponent currently holds a valid environmental clearance certificate for exploration activities on EPL 999 and EPL 3275, for which a renewal is being applied. As part of this application, an environmental compliance desktop audit has been undertaken to determine the status of compliance with the environmental management plan.

Navachab is located near the town of Karibib in Namibia. Karibib is situated approximately 170 km northwest of Windhoek, the capital of Namibia (Figure 1). The locations of EPL 999 and EPL 3275 are depicted in Figure 2 and Figure 3, respectively.

ECC has compiled an operational environmental management plan (OEMP) (Appendix D) in terms of the Environmental Management Act (EMA), No.7 of 2007 and its regulations of 2012 for Navachab's activities. Environmental compliance for EPL activities forms part of this OEMP.

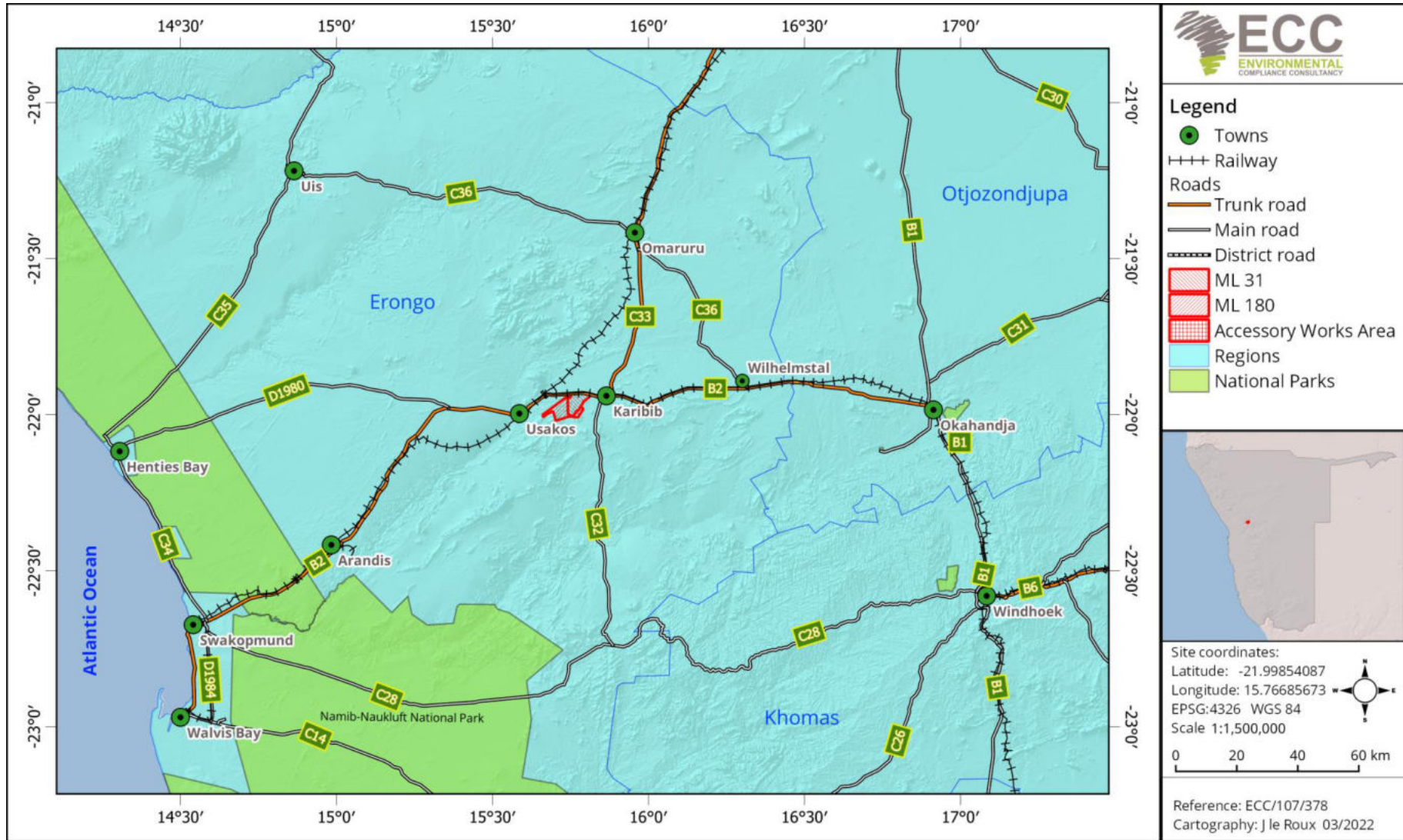


Figure 1 - Locality map showing the location of Navachab Gold Mine

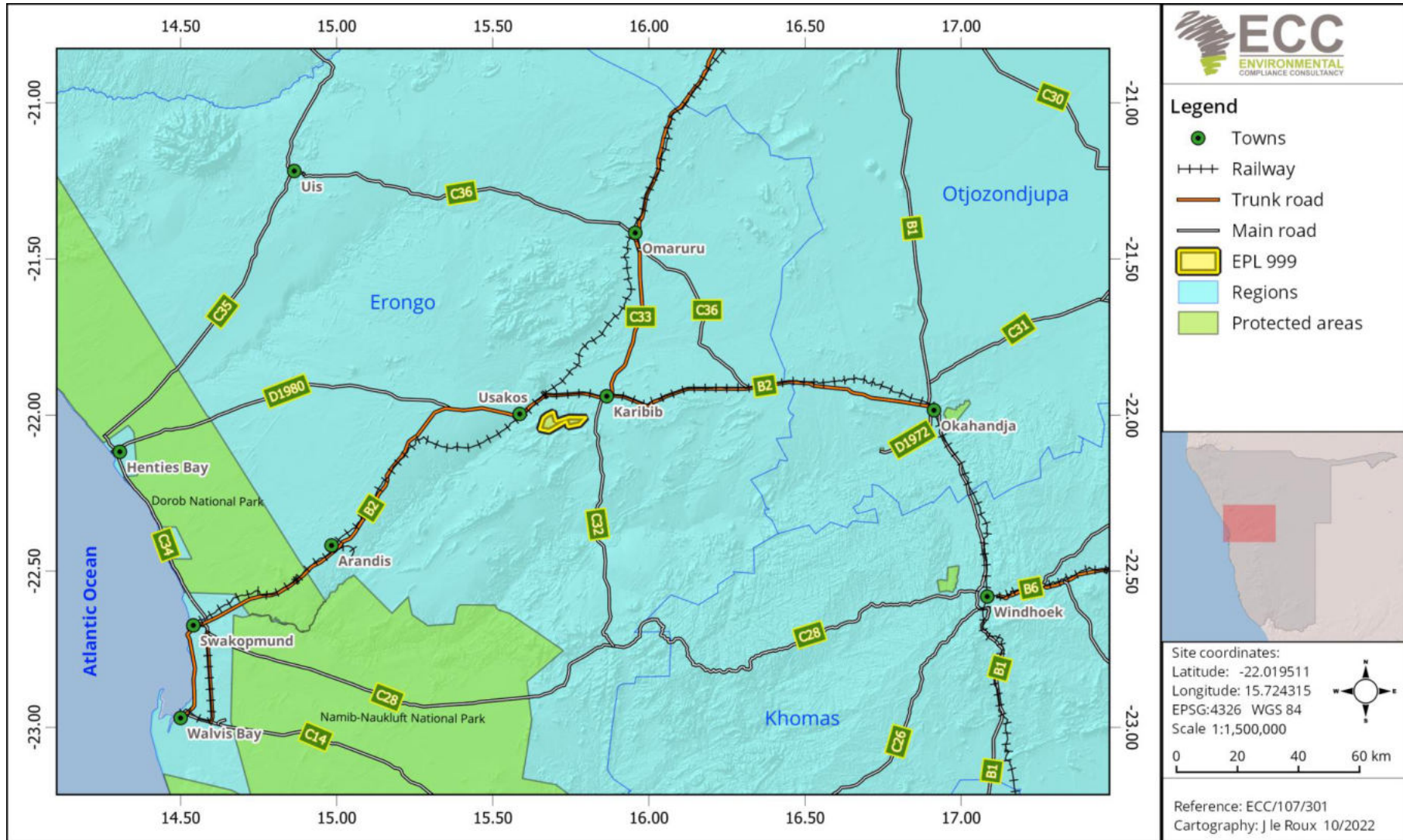


Figure 2 - Locality map showing the location of EPL 999

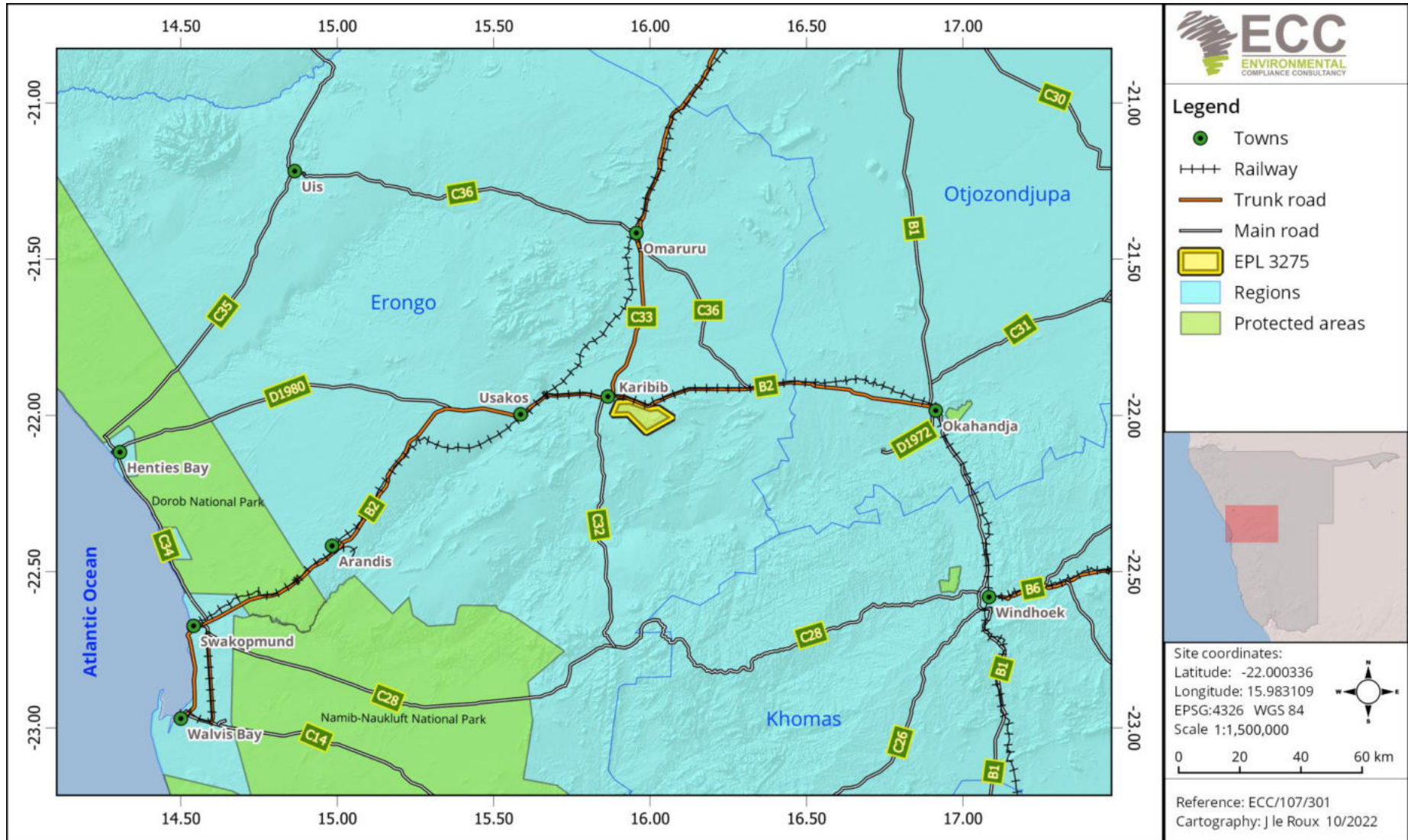


Figure 3 – Locality map showing the location of EPL 3275

1.2 THE PROPONENT OF THE PROPOSED PROJECT

QKR Namibia Navachab Gold Mine (Pty) Ltd is the Proponent for the project. The Proponents' details are provided in Table 1.

Table 1 – Proponents details

Company Representative:	Contact Details:
Mr George Botshiwe Managing Director (MD)	PO Box 150 Karibib Namibia George.Botshiwe@navachab.com.na +264 (64) 555 2012

1.3 ENVIRONMENTAL ASSESSMENT PRACTITIONER

Environmental Compliance Consultancy (ECC) (Reg. No. CC 2013/11401) has prepared this renewal report and on behalf of the Proponent.

This report has been authored by employees of ECC, who have no material interest in the outcome of this report, nor do any of the ECC team have any interest that could be reasonably regarded as being capable of affecting their independence in the preparation of this report. ECC is independent from the proponent and has no vested or financial interest in the project, except for fair remuneration for professional fees rendered based upon agreed commercial rates. Payment of these fees is in no way contingent on the results of this report or the assessment, or a record of decision issued by Government. No member or employee of ECC is, or is intending to be, a director, officer, or any other direct employee of Navachab Gold Mine. No member or employee of ECC has, or has had, any shareholding in Navachab Gold Mine.

All compliance and regulatory requirements regarding this report should be forwarded by email or posted to the following address:

Environmental Compliance Consultancy
PO Box 91193, Klein Windhoek, Namibia
Tel: +264 81 669 7608
Email: info@eccenvironmental.com

1.4 PURPOSE OF REPORT

The purpose of this report is to document the findings of a desktop environmental compliance audit, which accompanies the renewal application for the environmental clearance certificate for EPL 999 and EPL 3275.

The approved OEMP for the existing environmental clearance certificate is audited to monitor the proceeds of the project and ensure that all measures stipulated in the document are met and effectively adhered to, as required by the Department of Environmental Affairs (DEA). In an event where the project activities are altered, the OEMP is required to be revised and amended accordingly. As Navachab is an operational mining site, activities on the EPLs are routinely monitored, inspected and audited by the mine's Safety, Security, Environment and Emergency (SSEE) Department. ECC provides support and conducts monthly inspections and/or audits of the operational activities, as needed compliance of EPL 999 and EPL 3275 is incorporated into these audits when active exploration is occurring.

As per the Environmental Management Act, No. 7 of 2007 and its EIA Regulations of 2012, exploration activities on EPL 999 and EPL 3275 cannot be undertaken without a valid environmental clearance certificate. The exploration activities at EPL 999 and EPL 3275 proposes to assess the viability of precious metals in these EPL areas. The proposed methods of exploration have minimal impacts and rehabilitation of the natural vegetation is done as per the approved OEMP and procedure PR/ENV/502 – Exploration activities.

2 BACKGROUND TO EPL 999 AND EPL 3275

EPL 999 was granted to Erongo Mining and Exploration company on the 21 July 1999 and a name change transfer to QKR Namibia Navachab Gold Mine (Pty) Ltd was endorsed on the 06 March 2015 with the Ministry of Mines and Energy (MME). An environmental clearance certificate was issued to by the Ministry of Environment, Forestry and Tourism (MEFT) on the 07 September 1999.

EPL 3275 was granted to AngloGold Ashanti Namibia (Pty) Ltd on the 07 July 2005 and a name change transfer to QKR Namibia Navachab Gold Mine (Pty) Ltd was endorsed on the 06 March 2015 with the Ministry of Mines and Energy (MME). and an environmental clearance certificate was issued to by the Ministry of Environment, Forestry and Tourism (MEFT) on the 22 February 2006.

Both EPLs are located close to Karibib, on respective farms. EPL 999 is 4825.8129 hectares in size and EPL 3275 is 10920.5112 hectares in size.

The Proponent wishes to continue with exploration activities on the exclusive prospecting licence(s) (EPL) 999 and 3275 for precious metals.

2.1 RENEWAL ACTIVITIES

As part of the exploration programme, the following activities are envisaged:

- Soil sampling and geochemistry analysis
- Geophysical surveys (magnetic)
- Geophysical surveys (airborne and ground including induced polarisation)
- Standard exploration activities for gold exploration
- Drilling: RC and diamond drilling
- Maintenance of access roads
- Rehabilitation of drill sites

3 ENVIRONMENTAL COMPLIANCE AUDIT

3.1 SITE ACTIVITIES

3.1.1. Annual monitoring

An environmental report is submitted to the Ministry of Environment, Forestry and Tourism annually reporting on periods from 01 March of the previous year to 31 March in the current year. These reports report on compliance with regards to the activities taking place on-site. These reports are located in Appendix C.

3.1.2 Activities for the monitoring period

Work carried out during the reporting period includes the following per EPL;

EPL 999:

- In 2019 exploration mainly concentrated on soil sampling and was completed in November 2020.
- Geophysical surveys (magnetics) were carried out in the second half of 2020, to firm up on gold-in-soil (Au) anomalous zones obtained from soil geochemistry.
- Geophysical surveys (induced polarisation - IP) was carried out in the first half of 2021, to firm up on magnetic anomalies and create drill targets.
- Drilling of the Au-in-soil anomalous zones, firmed up by geophysics, was carried out on the first half of 2021.

EPL 3275:

- Geophysical surveys (magnetics) were carried out in the second half of 2020 and second half of 2022, to firm up on Au-in-soil anomalous zones obtained from soil geochemistry in 2019.
- Drilling started in the first half of 2021 to follow up on latest geophysics (magnetics) targets and infill on old drilling.

3.2 ANNUAL COMPLIANCE AUDIT

Furthermore, the approved OEMP covers all adverse environmental impacts, including any additional potential impacts that may result from the exploration activities on EPL 999 and EPL 3275. The OEMP and on site operational procedures provides the technical details for each mitigation, monitoring and institutional measure, including the impact(s) to which it relates and the conditions when required, together with designs, equipment descriptions and operating procedures as granted.

3.3 COMPLIANCE AUDIT FINDINGS

This section outlines the findings of the environmental audit completed for the EPLs. It addresses obligations in terms of the key Acts that govern the activities on site, the commitments made in the OEMP and/or related procedures (namely PR/ENV/502 – Exploration activities), and present the findings and recommended corrective actions where applicable (Table 2).

The OEMP and operational procedures:

- Identifies all mineral exploration activities that could cause environmental damage (risks and potential impacts) and provides a summary of actions required;
- Identifies institutions responsible for ensuring compliance with the OEMP and provides their contact information;
- Provides standard procedures to avoid, minimise and mitigate the identified negative environmental impacts and to enhance the positive impact of the proposed activities on the environment;
- Provides for site and exploration rules and actions required;
- Forms a written record of procedures, responsibilities, requirements and rules for contractor/s, their staff and any other person who must comply with the OEMP;
- Ensure zero pollution incidents; minimal vegetation clearing and earthworks, protect local flora, fauna, and water resources; and use water and other natural resources effectively and efficiently.
- Provides a monitoring and auditing programme to track and record compliance and identify and respond to any potential or actual negative environmental impacts, and
- Provides a monitoring programme to record any mitigation measures that are implemented.
- Ensure that an annual environmental audit is carried out by Navachab SSEE department and an independent third party.
- Once exploration has ceased, any impacts shall be rehabilitated.

3.4 ISSUES OF NON-COMPLIANCE

No issues of non-compliance were identified.

Table 2 - Exploration OEMP and PR/ENV/502 (Exploration activities) Audit

Activity	Potential Impacts	Management/Mitigation Measures	Compliance	Comments
Flora and fauna	- Damage to indigenous vegetation	- The minimize the effects of exploration activities on indigenous vegetation, photographs should be taken before commencement of the activity, on completion of rehabilitation measures, and after one rainy season to monitor the recovery of the vegetation.	- Compliant	- The Proponent will continue to ensure mitigation measures are in place as per the OEMP and required procedures.
	- Injury and/or damages/death to flora and fauna	- No hunting, wood or plant collection is permitted and no firewood may be collected without the concurrence of the landowner.	- Compliant	- The Proponent will continue to ensure mitigation measures are in place as per the OEMP and required procedures.
		- The starting of the veld fires shall be prevented and every effort shall be made to extinguish a fire as quickly as possible should it occur as a direct or indirect result of the company's activities.	- Compliant	- The Proponent will continue to ensure mitigation measures are in place as per the OEMP and required procedures.
Landowners	- Negative relations with farm owners and the local community	- Good relationships must be built and maintained with the landowner and local community.	- Compliant	- The Proponent will continue to ensure mitigation measures are in place as per the OEMP and required procedures.

Activity	Potential Impacts	Management/Mitigation Measures	Compliance	Comments
	<ul style="list-style-type: none"> - Lack of compensation during exploration activities 	<ul style="list-style-type: none"> - The landowner shall be compensated for any resource used by the crew on site, e.g. the use of water. 	<ul style="list-style-type: none"> - Compliant 	<ul style="list-style-type: none"> - The Proponent will continue to ensure mitigation measures are in place as per the OEMP and required procedures.
Roads/Track management	<ul style="list-style-type: none"> - Negative relations with farm owners and the local community - Poor maintenance leading to potential vehicle incidents - Injury and/or damages/death to flora and fauna 	<ul style="list-style-type: none"> - Vehicle movement must be restricted to existing fence lines, roads, tracks, and dry river beds. - Should the need arise to create new roads or tracks, they shall be planned so as to cause no unnecessary environmental damage, and only established with prior approval from the landowner. 	<ul style="list-style-type: none"> - Compliant 	<ul style="list-style-type: none"> - The Proponent will continue to ensure mitigation measures are in place as per the OEMP and required procedures.
		<ul style="list-style-type: none"> - All new roads must be rehabilitated on completion of the project. 	<ul style="list-style-type: none"> - Compliant 	<ul style="list-style-type: none"> - The Proponent will continue to ensure mitigation measures are in place as per the OEMP and required procedures.
Trenches and holes	<ul style="list-style-type: none"> - Injury and/or damages/death to flora and fauna - Injury and/or death to workforce or third parties 	<ul style="list-style-type: none"> - Exploration trenches/pits should be backfilled within 8 weeks of completion of the excavation. 	<ul style="list-style-type: none"> - Compliant 	<ul style="list-style-type: none"> - The Proponent will continue to ensure mitigation measures are in place as per the OEMP and required procedures.

Activity	Potential Impacts	Management/Mitigation Measures	Compliance	Comments
	<ul style="list-style-type: none"> - MME requirements not adhered too 	<ul style="list-style-type: none"> - Drill holes must be capped with cement and tagged with the borehole number. 	<ul style="list-style-type: none"> - Compliant 	<ul style="list-style-type: none"> - The Proponent will continue to ensure mitigation measures are in place as per the OEMP and required procedures.
	<ul style="list-style-type: none"> - Lack of appropriate restoration leading to vegetation not re-establishing - Injury and/or damages/death to flora and fauna - Injury and/or death to workforce or third parties 	<ul style="list-style-type: none"> - All sumps used in the drilling process must be backfilled and the area restored as close as possible to its original status. 	<ul style="list-style-type: none"> - Compliant 	<ul style="list-style-type: none"> - The Proponent will continue to ensure mitigation measures are in place as per the OEMP and required procedures.
<p>Infrastructure</p>	<ul style="list-style-type: none"> - Maintaining good landowner relations 	<ul style="list-style-type: none"> - If permanent buildings are to be built on the exploration site, prior agreement with the landowner is required. 	<ul style="list-style-type: none"> - Compliant 	<ul style="list-style-type: none"> - The Proponent will continue to ensure mitigation measures are in place as per the OEMP and required procedures.
		<ul style="list-style-type: none"> - Temporary campsites shall be established in agreement with the landowner. 	<ul style="list-style-type: none"> - Compliant 	<ul style="list-style-type: none"> - The Proponent will continue to ensure mitigation measures are in place as per

Activity	Potential Impacts	Management/Mitigation Measures	Compliance	Comments
				the OEMP and required procedures.
Water	<ul style="list-style-type: none"> Resource waste and management 	<ul style="list-style-type: none"> Any use of water for whatever purpose must be done in consultation with the landowner and the landowner shall be duly compensated for the use of such water. 	<ul style="list-style-type: none"> Compliant 	<ul style="list-style-type: none"> The Proponent will continue to ensure mitigation measures are in place as per the OEMP and required procedures.
Hazardous and non-hazardous waste management	<ul style="list-style-type: none"> Incorrect management of waste can result in littering, visual pollution, air soil, surface water and/or groundwater pollution 	<ul style="list-style-type: none"> All drilling and domestic refuse will be deposited on the Navachab Gold Mine or removed off site to a registered landfill site, respectively. 	<ul style="list-style-type: none"> Compliant 	<ul style="list-style-type: none"> The Proponent will continue to ensure mitigation measures are in place as per the OEMP and required procedures.
		<ul style="list-style-type: none"> All muck piles must be removed from drill sites and dumped at a suitable site in consultation with the landowner. 	<ul style="list-style-type: none"> Compliant 	<ul style="list-style-type: none"> The Proponent will continue to ensure mitigation measures are in place as per the OEMP and required procedures.
		<ul style="list-style-type: none"> Used oil and grease must be collected in drums and taken to the HME workshop on Navachab Gold Mine. Used oil is collected for recycling. 	<ul style="list-style-type: none"> Compliant 	<ul style="list-style-type: none"> The Proponent will continue to ensure mitigation measures are in place as per the OEMP and required procedures.

Activity	Potential Impacts	Management/Mitigation Measures	Compliance	Comments
		<ul style="list-style-type: none"> - Painting of ricks to mark grids in the field should be done with a water based paint to ensure weathering of the paint with time. 	<ul style="list-style-type: none"> - Compliant 	<ul style="list-style-type: none"> - The Proponent will continue to ensure mitigation measures are in place as per the OEMP and required procedures.
		<ul style="list-style-type: none"> - Soil and rock on which oil has been spilled must be dealt with as per the spill management plan in the OEMP. 	<ul style="list-style-type: none"> - Compliant 	<ul style="list-style-type: none"> - The Proponent will continue to ensure mitigation measures are in place as per the OEMP and required procedures.
		<ul style="list-style-type: none"> - Suitable portable chemical toilets must be used on site. - The portable toilet must not contaminate the surrounding soil and groundwater. - Sewage water must be removed from site on a regular basis by a registered waste removal company. 	<ul style="list-style-type: none"> - Compliant 	<ul style="list-style-type: none"> - The Proponent will continue to ensure mitigation measures are in place as per the OEMP and required procedures.
<p>Resource use</p>	<ul style="list-style-type: none"> - Inefficient use of water 	<ul style="list-style-type: none"> - Use water effectively and efficiently 	<ul style="list-style-type: none"> - Compliant 	<ul style="list-style-type: none"> - The Proponent will continue to ensure mitigation measures are in place as per the OEMP and required procedures.

Activity	Potential Impacts	Management/Mitigation Measures	Compliance	Comments
Job creation	<ul style="list-style-type: none"> – Employment creation and skills development opportunities during the exploration phase. 	<ul style="list-style-type: none"> – Maximise local employment and local business opportunities – Enhance the use of local labour and local skills as far as reasonably possible – Ensure that goods and services are sourced from the local and regional economy as far as reasonably possible. 	<ul style="list-style-type: none"> – Compliant 	<ul style="list-style-type: none"> – The Proponent will continue to ensure mitigation measures are in place as per the OEMP and required procedures.


4 CONCLUSION AND RECOMMENDATIONS

All proposed activities shall be carried out in compliance with the relevant requirements and conditions of the granted licence in accordance with the approved OEMP and procedure PR/ENV/502 (Exploration activities). 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 the project activities progress. It is further recommended that annually an independent environmental assessment practitioner conducts an infield audit on both EPLs.

APPENDIX A: ENVIRONMENTAL CLEARANCE CERTIFICATE EPL 999

ECC – 00227

Serial: np2141227
20/10/2019
0167
08-1462610
A. MÖLLER



REPUBLIC OF NAMIBIA
MINISTRY OF ENVIRONMENT AND TOURISM
OFFICE OF THE ENVIRONMENTAL COMMISSIONER

ENVIRONMENTAL CLEARANCE CERTIFICATE
ISSUED


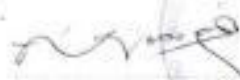
In accordance with Section 37(2) of the Environmental
Management Act (Act No. 7 of 2007)

TO

Navachab Gold Mine
Navachab Gold Mine, PO Box 150, Karibib, Namibia, Farm 58.

TO UNDERTAKE THE FOLLOWING LISTED ACTIVITY


Exploration & Mining of Precious metals at EPL999 & ML180 (Anomaly
16) ,Erongo Region.



DEPUTY ENVIRONMENTAL COMMISSIONER

Issued on the date: 2019-10-17
Expires on this date: 2022-10-17

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ECC –

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1. This environmental clearance is valid for a period of 3 (three) years, from the date of issue unless withdrawn by this office
2. This certificate does not in any way hold the Ministry of Environment and Tourism accountable for misleading information, nor any adverse effects that may arise from these activities. Instead, full accountability rests with the proponent and its consultants
3. This Ministry reserves the right to attach further legislative and regulatory conditions during the operational phase of the project
- 4.

APPENDIX B - ENVIRONMENTAL CLEARANCE CERTIFICATE EPL 3275

ECC – 00182 Serial: esLHe7182



REPUBLIC OF NAMIBIA
MINISTRY OF ENVIRONMENT, FORESTRY AND TOURISM
OFFICE OF THE ENVIRONMENTAL COMMISSIONER

ENVIRONMENTAL CLEARANCE CERTIFICATE
ISSUED

In accordance with Section 37(2) of the Environmental
Management Act (Act No. 7 of 2007)

TO

QKR Namibia Navachab Gold Mine
P O Box 150, Karibib

TO UNDERTAKE THE FOLLOWING LISTED ACTIVITY

**Exploration Activities on Exclusive Prospecting License (EPL)3275,
Karibib, Erongo Region**

Issued on the date: **2019-10-02**
Expires on this date: **2022-10-02**



16 SEP 2020
ENVIRONMENTAL COMMISSIONER
REPUBLIC OF NAMIBIA

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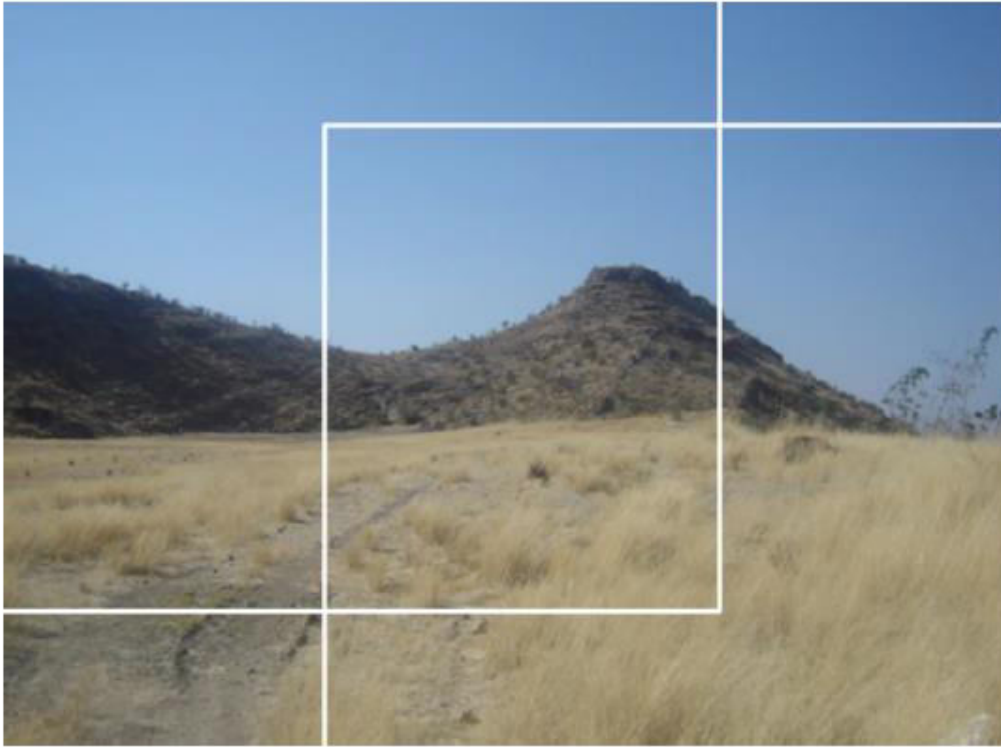
ECC –

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APPENDIX C – ANNUAL REPORTS 2019 – 2022

APPENDIX D – OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN



Submitted to: Navachab Gold Mine (Pty) Ltd
Attention: Mr George Botshiwe
Farm 58 Karibib
PO Box 150
Karibib
Namibia

REPORT:

NAVACHAB GOLD MINE – OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN

PROJECT NUMBER: ECC-107-408-REP-02-D

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DATE: 25 AUGUST 2022

Prepared by: 
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ENVIRONMENTAL
COMPLIANCE CONSULTANCY