

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  
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## ENVIRONMENTAL COMPLIANCE CONSULTANCY CONTACT DETAILS:

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Environmental Compliance Consultancy (ECC) (Reg. No. CC 2013/11401) has prepared this compliance report 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 the Proponent. No member or employee of ECC has, or has had, any shareholding in the Proponents company or project. Any personal views or opinions expressed by the writer may not necessarily reflect the views or opinions of Environmental Compliance Consultancy or its client.

*Please note at ECC we care about lessening our footprint on the environment; therefore, we encourage that all documents are printed double sided.*

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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.

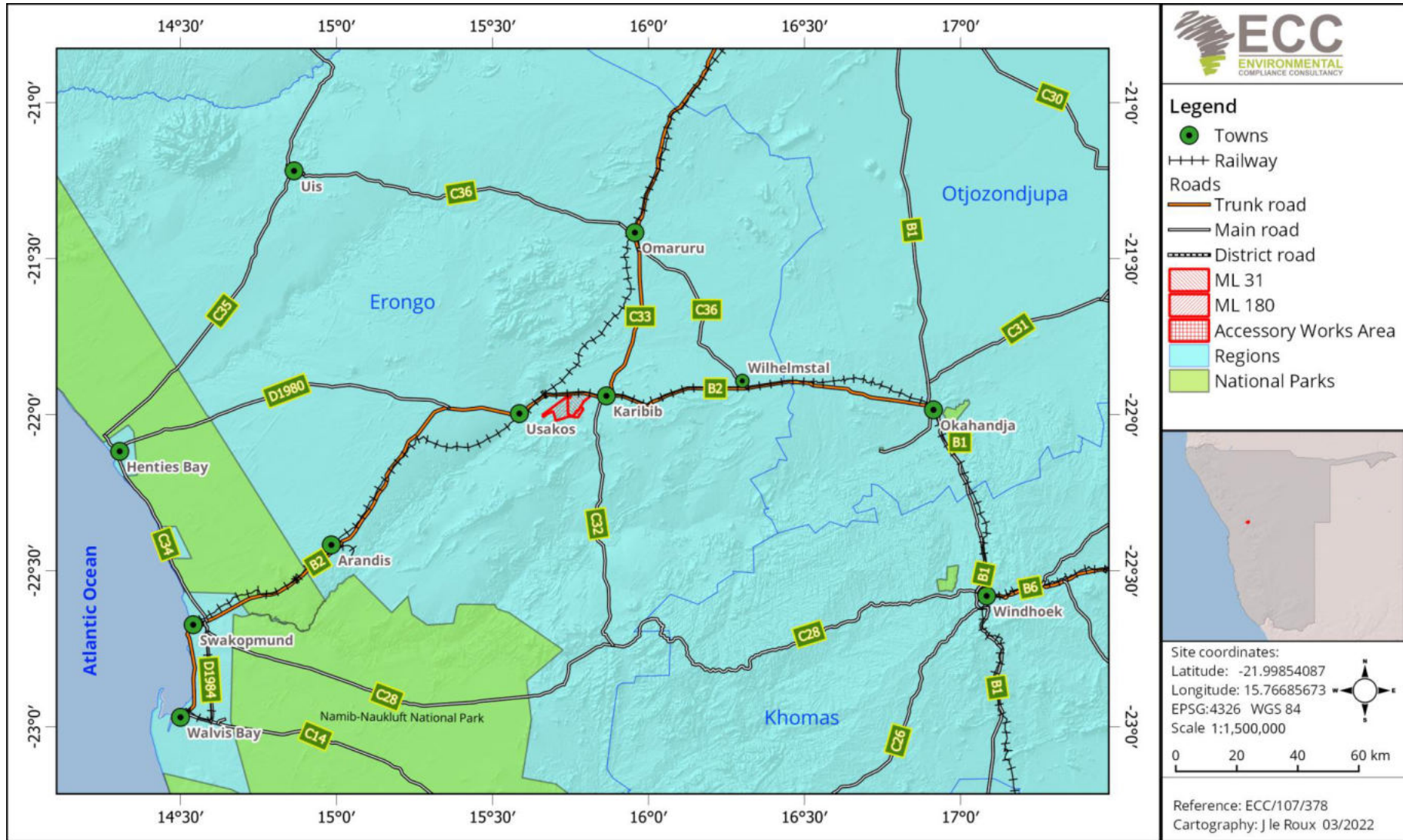


Figure 1 - Locality map showing the location of Navachab Gold Mine

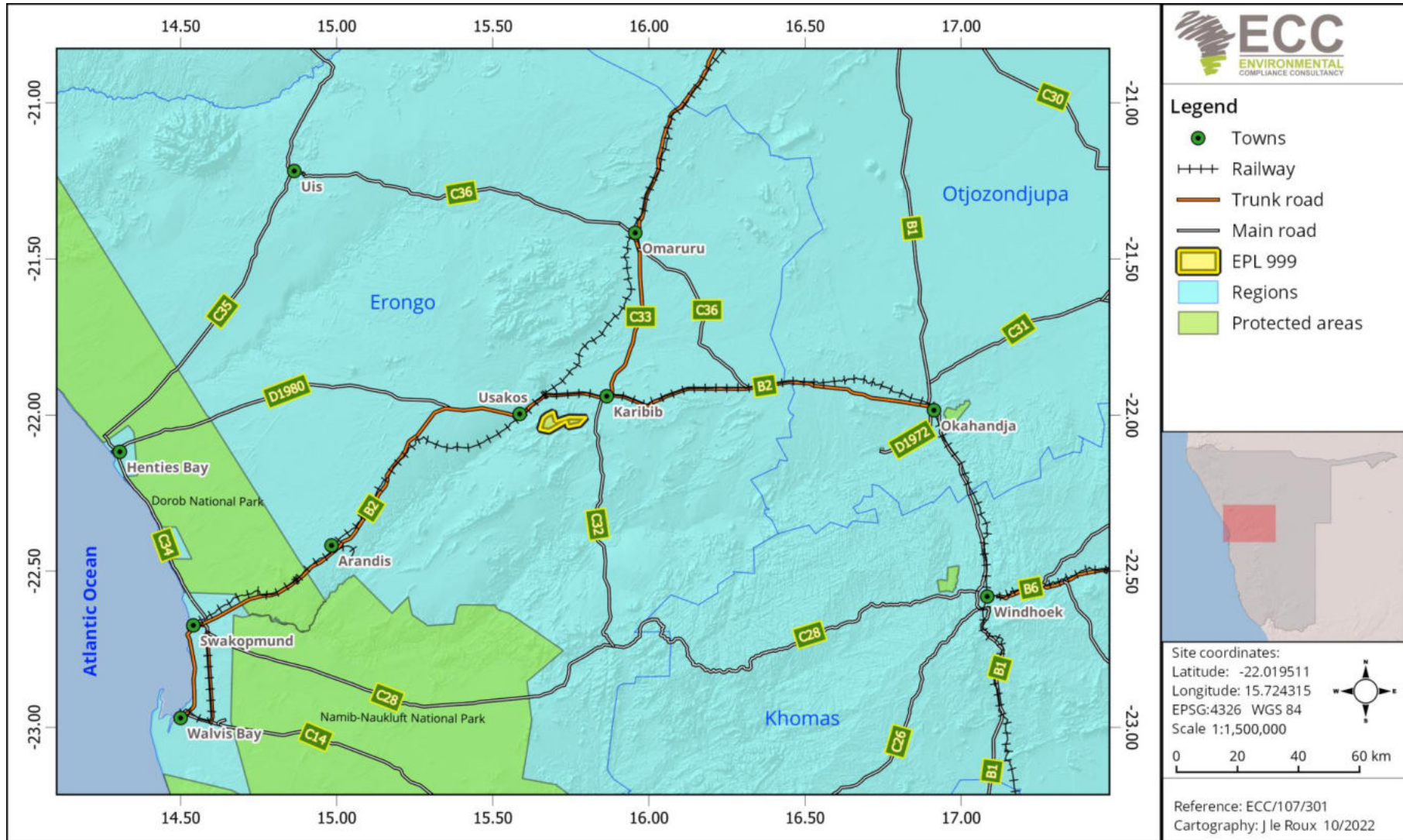


Figure 2 - Locality map showing the location of EPL 999

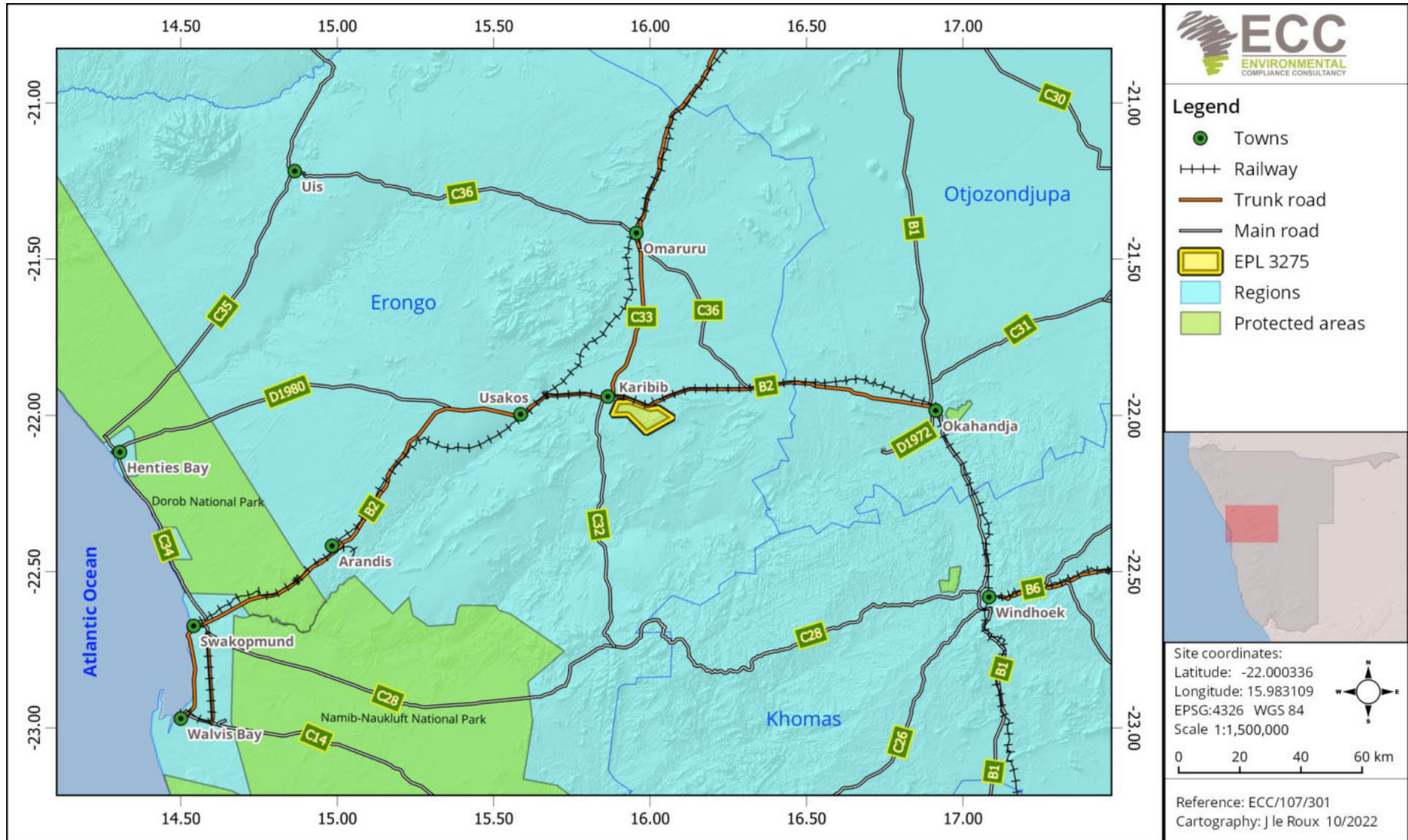


Figure 3 – Locality map showing the location of EPL 3275



## 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 <a href="mailto:George.Botshiwe@navachab.com.na">George.Botshiwe@navachab.com.na</a> +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](mailto: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
<b>Flora and fauna</b>	- 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.
<b>Landowners</b>	- 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"> <li>- Lack of compensation during exploration activities</li> </ul>	<ul style="list-style-type: none"> <li>- The landowner shall be compensated for any resource used by the crew on site, e.g. the use of water.</li> </ul>	- Compliant	<ul style="list-style-type: none"> <li>- The Proponent will continue to ensure mitigation measures are in place as per the OEMP and required procedures.</li> </ul>
<b>Roads/Track management</b>	<ul style="list-style-type: none"> <li>- Negative relations with farm owners and the local community</li> <li>- Poor maintenance leading to potential vehicle incidents</li> <li>- Injury and/or damages/death to flora and fauna</li> </ul>	<ul style="list-style-type: none"> <li>- Vehicle movement must be restricted to existing fence lines, roads, tracks, and dry river beds.</li> <li>- 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.</li> </ul>	- Compliant	<ul style="list-style-type: none"> <li>- The Proponent will continue to ensure mitigation measures are in place as per the OEMP and required procedures.</li> </ul>
		<ul style="list-style-type: none"> <li>- All new roads must be rehabilitated on completion of the project.</li> </ul>	- Compliant	<ul style="list-style-type: none"> <li>- The Proponent will continue to ensure mitigation measures are in place as per the OEMP and required procedures.</li> </ul>
<b>Trenches and holes</b>	<ul style="list-style-type: none"> <li>- Injury and/or damages/death to flora and fauna</li> <li>- Injury and/or death to workforce or third parties</li> </ul>	<ul style="list-style-type: none"> <li>- Exploration trenches/pits should be backfilled within 8 weeks of completion of the excavation.</li> </ul>	- Compliant	<ul style="list-style-type: none"> <li>- The Proponent will continue to ensure mitigation measures are in place as per the OEMP and required procedures.</li> </ul>

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



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

Activity	Potential Impacts	Management/Mitigation Measures	Compliance	Comments
		<ul style="list-style-type: none"> <li>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.</li> </ul>	– Compliant	– The Proponent will continue to ensure mitigation measures are in place as per the OEMP and required procedures.
		<ul style="list-style-type: none"> <li>Soil and rock on which oil has been spilled must be dealt with as per the spill management plan in the OEMP.</li> </ul>	– Compliant	– The Proponent will continue to ensure mitigation measures are in place as per the OEMP and required procedures.
		<ul style="list-style-type: none"> <li>Suitable portable chemical toilets must be used on site.</li> <li>The portable toilet must not contaminate the surrounding soil and groundwater.</li> <li>Sewage water must be removed from site on a regular basis by a registered waste removal company.</li> </ul>	– Compliant	– The Proponent will continue to ensure mitigation measures are in place as per the OEMP and required procedures.
<b>Resource use</b>	<ul style="list-style-type: none"> <li>Inefficient use of water</li> </ul>	<ul style="list-style-type: none"> <li>Use water effectively and efficiently</li> </ul>	– 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
<b>Job creation</b>	<ul style="list-style-type: none"> <li>- Employment creation and skills development opportunities during the exploration phase.</li> </ul>	<ul style="list-style-type: none"> <li>- Maximise local employment and local business opportunities</li> <li>- Enhance the use of local labour and local skills as far as reasonably possible</li> <li>- Ensure that goods and services are sourced from the local and regional economy as far as reasonably possible.</li> </ul>	<ul style="list-style-type: none"> <li>- Compliant</li> </ul>	<ul style="list-style-type: none"> <li>- The Proponent will continue to ensure mitigation measures are in place as per the OEMP and required procedures.</li> </ul>


## **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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**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 - 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**

*[See conditions printed over leaf]*



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REPUBLIC OF NAMIBIA



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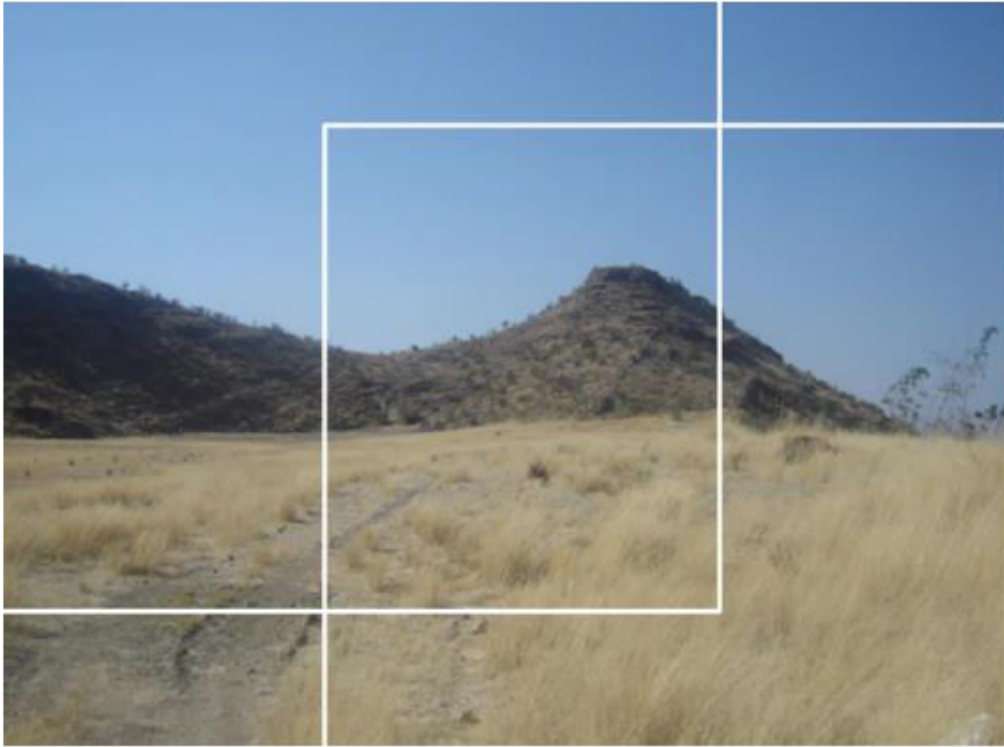
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3. This Ministry reserves the right to attach further legislative and regulatory conditions during the operational phase of the project



## **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  
**REPORT VERSION:** FINAL FOR GRN SUBMISSION  
**DATE:** 25 AUGUST 2022

Prepared by: 