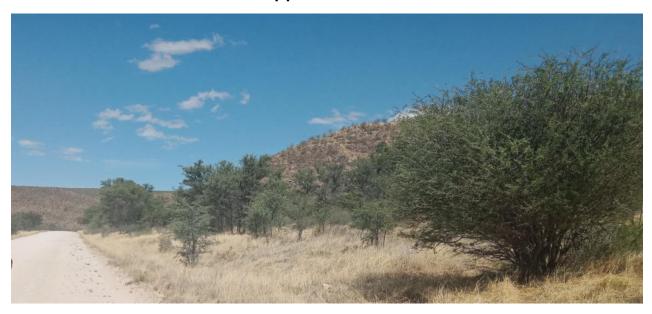
ENVIRONMENTAL MANAGEMENT PLAN

Exploration Activities for Base & Rare Metals, Industrial Minerals, Precious Metals and Precious Stones on Exclusive Prospecting Licence (EPL) 8616 in Khomas Region.

App No: 00295



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TITLE PAGE

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ABBREVIATIONS

CFP Chance Finds Procedure

ECC Environmental Clearance Certificate
EIA Environmental Impact Assessment
EMA Environmental Management Act
EMP Environmental Management Plan
EPL Exclusive Prospecting Licence

MC Mining Claim

MEFT Ministry of Environment, Forestry and Tourism

MME Ministry of Mines and Energy

1. INTRODUCTION

1.1 Background

Exclusive Prospecting Licence (EPL) 8616 is situated in Windhoek rural, Khomas Region. GPS coordinates (22°42'38" S & 17°47'37" E). The EPL can be accessed using the B6 road from the capital city (Windhoek) leading to Gobabis town; and turning right on the C23 road or Main road (M51).

The Exclusive Prospecting Licence (EPL) 8616 covers farm Omdraai No. 533 and Farm Middelplaas No. 117. In the licence area, there is already existing gravel roads and tracks that links to M51, C23 and the B6 road.

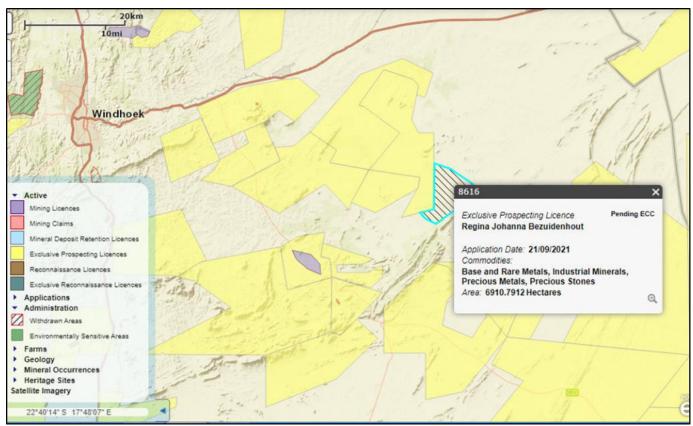


Figure 1: Location of EPL 8616

1.2 Scope of the EMP

The information contained in this EMP is centered on the project description as provided in the Environmental Scoping Assessment report. This EMP provides a realistic overview, anticipated mitigation measures and management methods associated with the anticipated project to ensure that likely environmental and social impacts are mitigated and reduced to minimal or zero (where possible); that statutory and other allowable requirements are obeyed and followed at all times.

Well-defined in the EMP are the practices, techniques, roles and responsibilities to make sure the administration schedules are efficiently and correctly implemented. This EMP report is an add-on to the environmental scoping report. This Environmental Management Plan shall be updated when there are changes in the scope of works.

The proponent shall ensure that workers that will be employed on this anticipated project, shall be by law required to comply and obey to the principles set out in this EMP. The scope of this Environmental Management Plan takes into consideration all activities that will be conducted during the exploration phaseon EPL 8616.

1.3 Compliance to the EMP

This EMP is a legally binding document as stipulated in the Environmental Management Act, 2007 (Act No. 7 of 2007). The Proponent, contractors and employees must therefore obey and conform to the information contained in this document. Any alterations made reliant on on the changing environments and new additional information that may be available in the future, must be revised accordingly in accordance with the EMA.

Non-compliance shall be recorded, including a brief description, the cause for the non-compliance, the person responsible, the consequence, and the correct action taken and any follow up measures compulsory.

1.4 Assumptions and Limitations

The Safety Management Plan shall be developed by the Proponent. This EMP is based on the project description in the Environmental Scoping Report.

2. REGULATORY FRAMEWORK

2.1 Environmental Requirement

This projected project is a listed activity as indicated in the Environmental Management Act No. 7 of 2007 and the Environmental Impact Assessment Regulation No. 30 of 2012. As a listed activity an application for an Environmental Clearance Certificate is compulsory. An Environmental Scoping Assessment Report and EMP are required as part of the Environmental Clearance Certificate (ECCC) application to complement the process.

This EMP has been embarked on in accordance with the requirements of the Environmental Management Act, No. 7 of 2007 and its regulations.

Table 1: Legislations, Acts and Policies of relevance

Legislation	Applicability	Legislation Objective(s)
The Namibian Constitution	To maintain the ecosystems, ecological processes and biological diversity by conducting Environmental Impact Assessment (EIA).	"The state shall actively promote and maintain the welfare of the people by adopting policies that are aimed atmaintenance of ecosystems, essential ecological processes and the biological diversity of Namibia and utilization of natural resources on a sustainable basis for the benefit of all Namibians, both for present and future".

Environmental Management Act No.7 of 2007	Legal requirement to carry out an Environmental Impact Assessment (EIA).	The Environmental Management Act No.7 of 2007 promotes the sustainable management of the environment and the use of natural resources and provides for the process of assessment and control of activities which may have significant effects on the environment; and provides for incidental matters. The Act ensures that potential impacts are considered, a comprehensive stakeholder's consultation is carried out, all interested and affected parties are given a chance to comment/object on the project. The Act as well provides a list of activities that may not be undertaken without an Environmental Clearance Certificate.
Environmental Impact Assessment (EIA)	Provides guidelines for Environmental	Provides procedures for Environmental
Regulations (GN notice	Assessments.	Assessments.
No. 30 of 2012)		

Minerals (Prospecting and Mining) Act No.33 of 1992 As amended Minerals (Prospecting and Mining) Amendment Act 8 of 2008	Governs all mining activities in the country.	To provide for the reconnaissance, prospecting and mining for, and disposal of, and the exercise of control over, minerals in Namibia; and to provide for matters incidental thereto
Public Health Act No. 36 of 1919	Safeguards the public is protected from noise, dust and air pollution.	No person shall cause a nuisance or shall suffer to exist on any land or premises owned or occupied by him or of which he is in charge any nuisance or other condition liable to be injurious or dangerous to health.
Water Resources Management Act No. 11 of 2013	Guarantees that the water systems are not polluted and that pollution control mechanisms are in place.	An Act to provide for the management, protection, development, use and conservation of water resources; to provide for the regulation and monitoring of water services and to provide for incidental matters.
Environmental Policy Framework (1995)	Provides guidelines for EIA.	The Policy ensures that all developmental projects are subjected to environmental assessments so that all

		potential impacts are taken into consideration and incorporated into the planning and development stages.
Labour Act No. 11 of 2007	Regulates labour in general, remuneration, etc in the country.	The Labour Act regulates labour in general and protects the safety, health and welfare of employees. The regulation of 1997 relating to the safety and health of employees at work, sets out the duties of employers, welfare and facilities at the work place.
Soil Conservation Act No. 76 of 1969	Promotes soil conservation.	The Act promotes the conservation of soil and the prevention of soil erosion.
National Heritage Act No. 27 of 2004	Provides protection and conservation of places and objects that has national heritage significance; and the registration of such places or objects.	The Act makes provision for the protection of places and objects of heritage significance and the registration of such places And objects. Section 46 of the Act, further prohibits the removal, damage, alteration,

		excavation of national sites or remains; and Section 48, sets out the procedure for application and granting permits for exploration activities such as trenching, drilling, etc.
Hazardous substances Ordinance No. 14 of 1974	Controls the handling of hazardous substances such as fuel, fire, etc.	The Ordinance controls the handling of hazardous substances such as manufacturing, imports and exports to ensure human and environmental safety.
Petroleum Product and Energy Act No, 13 of 1990	Provides for the safe handling of the petroleum products such as fuel and lubricants	The Act provides a framework for handling and distribution of petroleum products which may include purchase, sale, supply, acquisition, possession, disposal, storage or transportation thereof.
Word's Best Practices	Precautionary Approach Principle (Polluter Pays Principle). In cases of pollution, the proponent bears the full responsibility to clean up the environment.	Contaminator/polluter must be responsible to clean up the environment.

3. PROJECT PERSONNEL, ROLES AND RESPONSIBILITIES

The proponent, will be in possession of the Environmental Clearance Certificate for this proposed project and shall be answerable for the implementation and administration of this Environmental Management Plan. The implementation, monitoring and administration of this EMP shall be carried out on a day-to-day basis and monthly reviews. All contractors should be guided by this EMP.

The proponent shall arrange for a project team to manage and carry out the work and exploration activities consisting of the proponent's personnel and contractors. An employee shall be identified by the Proponent to help assist and support the Proponent at all times for the duration of the project.

The proponent shall be responsible to ensure that the project team, suppliers and/or contractors, obey and conform to the set out measures in this Environmental Management Plan; warranty that all employees get satisfactory training and coaching; and that environmental tasks are clearly agreed and understood.

3.1 Roles and Responsibilities

The below table shows the roles and responsibilities of the proponent, contractors/service providers and workers for the planned project.

Table 2: Roles and Responsibilities

ROLE	RESPONSIBILITIES
ENVIRONMENTAL COMPLIANCE OFFICER (ECO)	The Ministry of Environment, Forestry and Tourism (MEFT) is the overseer of environmental protection. The ECO shall be an appointed Environmental Officer from the Directorate of Environmental Affairs trusted to impose compliance. The ECO may carry out inspections and monitoring any time to ensure compliance.

PROPONENT OR PROPONENT'S REPRESENTATIVE

- General accountable for the administration, management and implementation of this EMP;
- Liable for providing the required resources (including financial and technical) for all responsibilities;
- Hire Managers such as a Project Manager and/or a Site Manager;
- Assure that all employees, contractors and visitors get inductions on environmental measures as defined in the scoping and EMP reports and safety measures as compiled by the proponent.
- Make certain that the environmental rules are communicated to all personnel and that all staffs, contractors, visitors understand adhere with the EMP.

PROJECT/SITE MANAGER

- Ensure all employees and contractors take part in a site induction procedure before they commence work.
- Keep community concerns and issues register.
- Keep records of complaints;
- Ensure that greatest environmental practice is carried out throughout the duration of the project; and report any non-compliance or accidents to the authority.
- Responsible for compliance with this EMP, oversee all day to day activities during the duration of the project, including routine and non-routine

		maintenance works, and decommissioning;
	0	Make sure enough resources are available for the execution of this EMP;
		Ensure that all employees, contractors and visitors to the site are familiar with the requirements of this EMP,
	0	significant to their roles at all times; Responsible for environmental
		awareness and management training and site inductions for all employees, contractors and visitors;
		Monitor everyday tasks and ensure devotion by employees to the EMP;
		Receive, respond to and record complaints; and Report any non-compliance or
		accidents to the proponent. Accountable for management,
		maintenance and review of the Environmental Management Plan.
Personnel (and contractors and visitors)		Liable for reporting incidents, accidents, tasks and conditions/issues that differ from the EMP or that are not
		obeying immediately to their supervisor.
		Accountable for complying and adhering to this EMP for the duration of the project.
	0	Attend site inductions when required to do so.
		Ensure that enough information on activities, roles are provided and understood.
	0	Ensure to wear personal protective clothing at all time when working;

3. 1 Chance Finds Procedures

Archaeology Chance Finds Procedure (CFP) Implementation Roles. The following personnel have been assigned responsibilities as per the Chance Finds procedure:

Actions:

Action by person identifying archaeological or heritage material: Stop work immediately, identify the site with flag, and mark GPS position, and report discoveries to foreman,

<u>Action by Foreman:</u> report findings, site locality and actions taken to Project/Site Managers and Proponent cease any work in close area

<u>Action by Project/Site Managers and Proponent:</u> Visit the site and determine whether work can proceed without damage to discoveries, mark the boundary, wait for confirmation by archaeologist.

<u>Action by archaeologist:</u> Inspect site, give advice to National Heritage Council and request permission in writing to take out or remove discoveries from work area, wrap and tag the discoveries for relocation to National Museum.

3.2 Employment

The proponent shall ensure that local people have access to information about job opportunities; and that some of the unemployed living in the local area are considered first for employment positions; the total number of job opportunities shall be made known together with the related skills and qualifications; the employing process should be clearly explained and communicated; the duration of the employment shall be clearly specified; and staffs with no proof of permanent residence shall not be employed.

3.3 Contractors

All contractors that will be appointed during the exploration project should ensure that correct actions are taken to report all likely environmental hazards and cases/incidents to the Project Manager; carry-out activities in accord with this EMP and related policies, procedures, management plans, legislative requirements; and executing suitable environmental management measures.

3.4 Disciplinary Actions

Non-compliance with the Environmental Management Plan shall result in disciplinary legal action such as:

- Suspension of work;
- Monetary penalties.

The disciplinary action shall be determined as per the provision of EMA and relevant statutory framework. Under Section 27 (4), Any person who contravenes subsection (3) commits an offence and is on conviction liable to a fine not exceeding N\$500 000 or to imprisonment for a period not exceeding 25 years or to both such fine and such imprisonment".

4. TRAINING AND COMMUNICATIONS

4.1 Emergency Response Services

The proponent shall ensure that all personnel aware and familiar of the below emergency response numbers. These numbers will be posted on site and made available in every company vehicle.

Table 3: Emergency Contact Numbers

TOWN	POLICE	HOSPITAL	AMBULANCE	FIRE BRIGADE
Windhoek	+264 (61) 1-0111	+264(61) 203 9111	+264 (61) 21-1111	+264 (61) 21- 1111

4.2 Communication and Training

All times during the exploration, the Project Manager shall communicate all environmental issues to the project team through audits, site inductions, site inspections; information on incident response actions; and meetings on specific environmental issues.

The proponent shall ensure that all interested and affected parties shall be aware of all likely impacts and how to reduce them. It is vital to ensure that all stakeholders are well informed regularly; and appropriately trained on effective compulsory measures. All personnel employed on the project shall be educated to perform or accomplish responsibilities that are likely to cause an environmental impact.

All the workers involved in the project should understand why the environment needs to be protected, including the social aspects involved, how the exploration activities can impact the environment and possible mitigation measures.

This EMP should be given/distributed to Staffs and all contractors working on the exploration site to make sure that the environmental requirements are effectively communicated. Delicate tasks shall be communicated to workers and contractors.

Discussions among the management will take account of any complaints received and actions to resolve them, incidents and responses, assessments, audits and any goal achievements.

4.3 Induction

Inductions are vital information session that helps to familiarize people with the locations, equipment, materials, processes and tasks they may encounter while working at or visiting a site for the first time.

To ensure that greatest results are attained, inductions need to be custom-made and targeted accommodating all workers (i.e. employees, contractors, trainees).

Employees shall require a refresher if:

- They have been absent for some time
- The work environment is different to that normally encountered (e.g. switching to night shift for first time).

4.3.1 Site inductions

Site inductions shall guarantee that employees obtain applicable and correct information before starting work, to ensure that they can identify the dangers on site that can harm them. Workers should also understand the control measures in place to protect themselves from the hazards/incidents.

Induction requirements shall be determined using information sourced from:

- Legislative requirements
- o Site specific competency and training needs analysis
- Standards applicable to site.

All site inductions shall contain an assessment to ensure the required knowledge has been retained by worker. It is important to examination the site's induction regularly to determine if the content is still related.

Site inductions shall include an official program that warrants the workforce with an understanding of:

- Site layout including emergency assembly points
- Emergency contact numbers
- o The responsibilities of the proponent and employees
- o General/common probable incidents on the site and their control measures.
- Basic environmental management principles to reduce negative impacts and tools used on site
- Reporting processes for incidents; and
- The standard behavior expected of workers on sites

4.4 Complaint Register

The personnel shall be informed about the complaints register, its location and the person answerable of keeping it, in order to refer residents or the public who wish to lodge a complaint. The complaints register shall be kept for the entire period of the project; and will be made available for government or public review upon request. It is the duty of the Project Manager to maintain a complaint register that has details of the names of the complainant, date and time of the complaint and actions taken to resolve the issues. The complainant shall be informed in writing of the results of the investigation and actions to be taken to rectify or address the matters.

4.5 Environmental Inspections and Compliance Monitoring

The Project Manager shall be responsible to ensure that this EMP is adhered to and complied with at all times throughout their daily roles; and to make sure that pollution control measures are adhered to. Daily, weekly and monthly inspections will be carried out.

5. ENVIRONMENTAL MANAGEMENT PLAN (EMP)

The main purpose of the Environmental Management Plan (EMP) is to reduce waste generation, low to zero pollution/contamination cases, least clearing of vegetation and earthworks, protect and preserve indigenous flora and fauna; and make certain that activities in nearby farms are not disturbed.

The scope of this EMP is with reference to the Environmental Assessment of the exploration activities, and decommissioning phase of the proposed project. This EMP is designed by considering environmental, social, safety and occupational health characteristics related with this proposed exploration project.

Note: The EMP provisions below shall apply to planning, construction and operation phases.

Table 4: The Environmental Management Plan (EMP)

Activity	Objectives
	Induction
A – Staff Induction	Communication
	General safety at workplace
B – Health and Safety	Ablution facilities
	Dust and Noise Exposure
	Material waste, domestic waste
C – Pollution and Waste Management	Exploration equipment and vehicle emissions, dust and noise
	Fuel spillage and leakages
	Oil and lubricant leakages
	Soil
D – Environment	Water
	Biodiversity
	Rehabilitation
E – Cultural Heritage	Archaeological and Heritage
F – Socio- Economic	Employment
	Alcohol and drug abuse
	Working hours
	Capacity building
	HIV / AIDS

Table 5: Environment: Environmental Mitigation Measures to be implemented

POTENTIAL	MITIGATION MEASURE	MONITORING	RESPONSIBILITY
IMPACT		REQUIREMENTS	
BIODIVERSITY LOSS/HABITAT DESTRUCTION	*Employees should not be allowed to cut and collect firewood. *Employees should not be allowed to catch fish in the river. * Provide electricity or gas to workforce for cooking and heating to discourage firewood collecting. * Promote re-vegetation in cleared areas when the exploration activities will come to an end. *No animals must be killed unless it poses danger. *No domestic animals should be allowed at the site. *Prevent the destruction of protected species by minimizing clearance areas through proper planning of the proposed exploration activities. * Where possible, rescue and relocate plants of significance.	DAILY	PROJECT/SITE MANAGER EMPLOYEES, CONTRACTORS

SOIL EROSION	*Where possible, vegetation will be cut at ground level, leaving the root system intact so		PROJECT/SITE
	as to limit soil erosion. *Land clearing will be conducted in a way that limits topsoil	WEEKLY	MANAGER,
	disturbances *Land will be reclaimed as soon as possible and when that is done,		
	topsoil will be replaced on cleared areas. * Movement of all		
	vehicles must strictly be within the project site; *Sand and gravel loads		
	from exploration trenches should be placed in designated areas;		
	*Rehabilitate all sites upon completion of the project;		
	*Exploration activities should be limited to potential targeted sites only in the Mining claim.		
	* Personnel must NOT be		
NOISE DISTURBANCE	exposed to noise levels above the required 85dB, earmuffs must be	DAILY	PROJECT/SITE MANAGER, EMPLOYEES,
	provided.		CONTRACTOR

	T		
	* All vehicles and	OR AS	
	machinery/equipment	APPROVED BY	
	to be shut down	MANAGEMENT	
	between periods of use.		
	*Noise nuisance shall		
	monitored according		
	* Residents shall be		
	provided at least two		
	(2) weeks notice of		
	drilling procedures		
	within 1 km of their		
	property.	NB: PUBLIC	
	*If possible, use	COMPLAINTS	
	exploration equipment	MUST BE RECORDED	
	with low noise emission.	RECORDED	
	*Specific activities that		
	may generate dust and		
	impact on residents		
	must be avoided during		
	high wind events.		
	*Monitoring stages of		
	dust produced by		
	project associated with		
	vehicles dust control		
	activities.		

	*Minimum vehicle		
EVVICEIOVIC VVID	speeds on site roads to		
EMISSIONS AND	be 30km/h.		
DUST	*During dry poriods of		PROJECT/SITE
	*During dry periods of		MANAGER,
	the year, when the surface of roads are	DAILY/WEEKLY/ MONTHLY	EMPLOYEES, CONTRACTOR
		INIONIALI	CONTRACIOR
	likely to cause		
	significant dust, The		
	proponent will take		

	effective steps to reduce dust. * Gravel or sand loads must be covered or frequently sprayed with water; *All vehicles and machinery/equipment to be shut down between periods when not in use. *Measures that may be utilized to control dust include: 1) Routine watering of roads and work sites; 2) Application of dust suppressants as a longer term solution to road dust. *Use existing access roads and paths where possible. * Non-toxic human dust exposure levels may not exceed 5mg/m3 for respiratory dust and 15mg/m3 for dust in total as per Labour Act. *Engines must be switched off when vehicles are not in use.	NB: PUBLIC COMPLAINTS MUST BE RECORDED DAILY, WEEKLY	
SURFACE AND GROUNDWATER CONTAMINATION	*Consider other sites when the water table is too high.	DAILY/WEEKLY/ MONTHLY	

	*Drill structures should be dug to direct any unintended spills into sumps. *Waste water shall be contained. *Water from existing water sources shall be used in agreement with the owners of farms in the area, * Heavy drilling equipment should be carefully checked for leakages; and if refuelling is taking place on site it must either be on a tank mounted on stilts to prevent any leakage and contamination.		PROJECT/SITE MANAGER, EMPLOYEES, CONTRACTOR
SOIL AND WATER CONTAMINATION	* Any spills and leaks, polluted soils must be collected and disposed of at an approved local site. *Still vehicles and equipment must have drip trays to collect leakages of lubricants and oil. *Spills and leaks to be cleaned immediately.	DAILY,WEEKLY	EMPLOYEES, CONTRACTOR, PROJECT/SITE MANAGER

WASTE GENERATION	*Implement a standard waste management procedure for all types of wastes. *Waste should be disposed of at approved disposal sites only. *Recycle and Re-use where possible. *Wastewater should be contained and not disposed on site. *Provide temporary toilets in the ratio of 1:15 and 1:30 for females and males; and effluent to be disposed of at the nearest local waste water treatment plant. *Functional toilets shall be on site. *No waste shall be buried on site or in the surrounding areas. *Harmful waste shall not be allowed on site.	DAILY Wheelie bins and skip containers must be provided on site. Record effluent disposal	EMPLOYEES, CONTRACTOR, PROJECT/SITE MANAGER
SAFETY & HEALTH	*Every worker shall be provided with Personal Protective Equipment (PPE), ear smuffs, etc which must be worn at all times during working hours and/or when on site. * A compulsory safety induction training	AS CERTIFIED BY THE APPROVED PERSONNEL (VISUAL SIGNS)	MANAGEMENT ,EMPLOYEES & CONTRACTOR S

	course shall be given to all personnel. *The Proponent shall develop a health and safety *Clear health and safety signs at every selected areas, marked "ENTRANCE, EXIT, ASSEMBLY POINTS, DANGER ZONE, NO ENTRY, STAFF ONLY, etc.		
ALIEN INVASIVE	*All alien invasive should be cleared out.	AT THE END OF THE EXPLORATION.	PROJECT/SITE MANAGER/ CONTRACTOR/ EMPLOYEES
VISUAL AND SENSE OF PLACE	*The proponent to ensure that rehabilitated areas balance in well with the natural environment. *Upon completion of the exploration, overburdens should be placed in the trenches and excavated areas and be levelled as part of the rehabilitation.	AT THE END OF EXPLORATION.	PROPONENT/ PROJECT/SITE MANAGER/ CONTRACTOR/ EMPLOYEES
WATER ABSTRACTION	*A valid water abstraction permit should be obtained from the MAWLR. * Observe and control water usage and	OBTAIN A VALID WATER ABSTRACTION	MANAGEMENT

	minimise unnecessary	PERMIT (where	
	use where necessary.	required)	
	*Re-use and Recycle		
	water where possible.		
	*Pollution or any noxious		
	waste should not be		
	allowed to enter the		
	freshwater ecosystem.		
	*Hire local contractors.		
	*Reasonable wages,		PROPONENT/
	compensation; and		PROJECT/SITE
EMPLOYMENT	labour practise as per		MANAGER
	Namibian Labour Laws		
	must be followed.		
	* All general work must		
	be set aside for local		
	people except in		
	positions requiring		
	specialized skills.		

6. REHABILITATION AND DECOMMISSIONING

The Proponent shall be accountable to undertake the rehabilitation and decommissioning implementation, which will be done as per the Proponent's decommissioning & rehabilitation Plan.

The Proponent will ensure that the footprint of Project activities is minimized throughout the operations and completely remediated following the end of operations.

A complete rehabilitation and decommissioning application shall be done by the proponent, which should include the following:

- I. Demolishing and removal of all temporary and permanent structures;
- II. A site cleanup shall be completed prior to land recovery. This will include the removal of all litter, barrels, cans, drums, contaminated materials from accidental spills and any other work refuse or excess materials, disturbed areas to be prepared accordingly;
- III. Retrieval of topsoil;
- IV. Building rubbles shall be disposed of at local dumpsite site and rehabilitation monitoring should be done respectively.