

ECONO INVESTMENTS (PTY) LTD

EPL 5758 GOBABIS- OMAHEKE REGION.

ENVIRONMENTAL MANAGEMENT PLAN (EMP) REPORT



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ENVIRONMENTAL ASSESMENT PRACTITIONER

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PROJECT INFORMATION

PROJECT TITLE: ENVIRONMENTAL IMPACT ASSESSMENT AND ENVIRONMENTAL MANAGEMENT PLAN FOR THE PROPOSED SEPIOLITE EXPLORATION BY ECONO INVESTMENTS (PTY) LTD AT FARM , NUISIE OVER EPL 5758 IN GOBABIS, OMAHEKE REGION.

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ABBREVIATIONS AND ACRONYMS

| | |
|------------------|--|
| EMP | Environmental Management Plan |
| EIA | Environmental Impact Assessment |
| EC | Environmental Commissioner |
| SADC | Southern African Democratic Country |
| RSA | Republic of South Africa |
| MME | Ministry of Mines and Energy |
| MET | Ministry of Environment and Tourism |
| MAWF | Ministry of Agriculture Water and Forestry |
| DWA | Department of Water Affairs |
| OMDEL | Omaruru Delta |
| MC | Mining Claim |
| DEA | Department of Environmental Affairs |
| SM | Site Manager |
| ENC | Environmental Coordinator |
| SF | Site Foreman |
| PS | Project Staff |
| PP | Project Proponent |
| EIA-C | Environmental Impact Assessment Consultant |
| I&Aps | Interested and Affected Parties |
| EAs | Environmental Assessments |

1. Environmental Management Plan (EMP)

1.1. Background

Centre for Geosciences Research cc was appointed to undertake the EIA on the proposed establishment of a stone quarry.

ECONO INVESTMENTS (PTY) LTD holds rights over EPL 5758 in the Omaheke region. ECONO INVESTMENTS (PTY) LTD is a Namibian owned company interested in exploiting sepiolite clay at farm Nuisie. This rationale for the exploration is based upon the increasing demand for industrial minerals such as sepiolite clay in Namibia, particularly in Omaheke region. Sepiolite clay quarrying is not well appreciated due lack of adequate quarries that exist there to meet the demand supply for the specialized industrial minerals. The clay quarry within the rural Omaheke has potential to sustain the farmers' income with recent past persistent periodic drought events, hence the opportunity presents as an alternative to farming land use practice to sustainable income generation. Therefore ECONO INVESTMENTS (PTY) LTD sees this as an opportunity to unveil the potential that the sepiolite clay industry in Namibia has to offer.

With this short background, it further reiterated that ECONO INVESTMENTS (PTY) LTD propose to carry out detailed exploration at farm Nuisie. As stipulated in the Government gazette announcing the commencement of the Environmental Management Act 2007 that an Environmental Impact Assessment be conducted for every prospecting and mining undertaking. **ECONO INVESTMENTS (PTY) LTD** appointed **CENTRE FOR GEOSCIENCES RESEARCH** to carry out the said assessment for EPL 5758.

1.2. Project description

ECONO INVESTMENTS (PTY) LTD intends to implement An exploration to asses the suitability to set up a small scale surface quarry for sepiolite clay operation. The proposed exploration has a strong focus on sepiolite clay in particular. The intended exploration for clay will use the hydraulic rock breaker machinery and back hole front Loader as a quarrying method to loosen the consolidated sepiolite during sampling to determine the total mineable reserves.

1.3. Summary of the proposed activities

The environmental issues related to exploration of small scale surface quarry for clay is common to most surface operations. These issues include oil spillage, dust or air pollution, impact on biodiversity, and land disturbance, impact on groundwater aquifer and also social economic impacts. The exploration operations processes and associated activities are as follows:

- Ground or land disturbances will take place and this will result in localized loss of flora as well as any other fauna that maybe depended on such specific flora;
- Cutting, Drilling, trenching, and bulk sampling will be used in test mining for loosening the hard rock.
- The creation of an access roads around the mining claim area;

1.4. Environmental requirements

ECONO INVESTMENTS (PTY) LTD is required by law to undertake an Environmental Impact Assessment (EIA) for the exploration in line with the following legal requirements:

- Prospecting and Mining Act, 1992, (Act No 33 of 1992);
- Environmental Assessment Policy for Sustainable Development and Environmental Conservation of 1995;
- The Environmental Management Act, (Act No. 7 of 2007) and its EIA regulations Of 2012

1.5. Fulfilments of the environmental requirements

ECONO INVESTMENTS (PTY) LTD has appointed CENTRE FOR GEOSCIENCES RESEARCH as the Environmental Consultant. Therefore CENTRE FOR GEOSCIENCES RESEARCH Cc has prepared this Environmental Assessment Report covering the Environmental Impact Assessment (EIA) and Environmental Management Plan (EMP) in order to meet the statutory environmental management requirements of the proposed clay exploration activity in EPL 5758 . This Environmental Management report has been undertaken within the framework of the existing environmental assessment process as described in the Environmental Assessment Policy for Sustainable Development and Environmental Conservation of 1995, published by the Ministry of Environment and Tourism as well as the provisions of the Environmental Management Act, (Act No. 7 of 2007) and its EIA regulation of 2012.

1.6. What is an Environmental Management Plan?

Environmental Management Plans (EMP's) are important tools that focus on the management actions that are required to ensure not only environmental compliance of projects, but also on implementing mitigation measures aimed at maximizing positive impacts while minimizing negative ones. The statutory validity and compliance significance of the EMP is inherited from the provisions of Regulations (2012) of the Environmental Management Act (2007) state that “the environmental management plan shall set out steps that are intended to be taken to manage any significant environmental impact that may result from the operation of the undertaking”.

Against the above given context, EMP are thus by their nature recurring processes that transform mitigation measures into actions and through cyclical monitoring, auditing, review and corrective action, ensures conformance with stated EMP aims and objectives. Inherently, an EMP must respond to unforeseen events and changes in project implementation that were not considered before, and this is achieved through monitoring and auditing, including feedback for continual improvement in environmental performance.

1.7. What are the legal implications and obligations under this plan?

The Environmental Management Plan will be sent to the Directorate of Environmental Affairs (DEA) of the Ministry of Environment and Tourism (MET) for approval. Once the DEA is satisfied with the contents of the EMP, they will issue a pro-forma Environmental Clearance Certificate to ECONO INVESTMENTS (PTY) LTD. The Environmental Clearance Certificate is linked with the recommendations of the Environmental Management Plan.

The EMP, once accepted with the receipt of the Environmental Clearance, therefore becomes a legally binding document and each role-player including contractors and sub-contractors who are made responsible to implement the relevant sections of this EMP, are required to abide to the conditions stipulated in this EMP document .

1.8. Positive Impacts

1.8.1. Employment/job creation

The exploration phase will create both direct and indirect jobs. The sampling activities will employ of about 12 to 15 people, whereas, the transporting, offloading and shipping of samples will create about 3 jobs. Indirect jobs will come from the multiplier effects of the pressure on disposal sites and upstream service providers to the proposed project.

1.8.2. Enhancement measures for employment/job creation

- Where unskilled labour can be used, a 'locals first' policy should be considered by ECONO INVESTMENTS (PTY) LTD
- It is proposed that local people, meaning the community members from Gobabis Town, should be employed as far as possible, especially where no specific skills are required.
- Both men and women should be granted the opportunity to be employed by this project.

1.8.3. Support to local retailers shop

Mining is the highest foreign currency earner and GDP contributor to the Namibian economy, therefore the presence of mining activities near local authorities stand to benefit the local economies from project related purchases, for example, the retail, accommodation and recreation sectors.

1.8.4. Enhancement measures for support to local retailers shop

- ECONO INVESTMENTS (PTY) LTD and its employees are encouraged to purchase or support local retailers in Gobabis Towns unless the intended material/product to purchase is not available.

1.8.5. Export taxes and VAT payment

Export taxes and VAT payments contribute significantly to the national economy contribution. Thus, without these payments our government will not be able to roll out project on infrastructure, being it water, road or electricity and also sanitation facilities nationwide.

1.8.6. Enhancement measures for export taxes and VAT payment

- ECONO INVESTMENTS (PTY) LTD and its employees are encouraged to make these payments when applicable to support the economic growth of the country.

1.9. Negative Impacts

1.9.1. Solid waste: wires, drill bits, and human waste

Human activities at the mining site will to some extent produce litter, particularly small items that people throw away on the ground. This impact will be minimized or/and eliminated by providing adequate waste collection bins. In addition; awareness posters are proposed as constant reminders in reinforcing this commitment.

1.9.1.1. Mitigation

- Provision of adequate waste bins, particularly in litter prone areas of the site, and
- Awareness enhancement measures by use of visual posters, chiefly for those who cannot read.
- For human waste, mobile toilet should be made available on site for workers and once these facilities are full, the collected human waste should be disposed at the Gobabis Town human waste disposal site. Prior to the disposal of the above mentioned wastes ECONO INVESTMENTS (PTY) LTD must entered into agreement with the Gobabis Town for permission to use their facility.

1.9.2. Impact of oil spills on groundwater aquifer and surface water streams

The use of industrial vehicles and air compressor generators on the mining site will pose a risk of oils spillage. Besides the health risk of its bio-availability, oil and oil spillage contaminates top soil, groundwater aquifer, and is a fire risk and impairs biological productivity of top soil.

1.9.2.1. Mitigation

- Train and supervise staff to ensure minimal spillage of oil.
- Routine inspections before the start of every work schedule involving potential spillage.
- Collect used oil in drums and to be collected by a recycling company

1.9.3. Land or soil disturbance: on site and the proposed access stretch road

The sampling process will involve cutting out bulk samples from in situ clay outcrops and therefore disturbing the landform and the soil cover in the immediate surroundings of the mining site. This undertaking will have visual impact and has the potential of disturbing the structural integrity and biological productivity of top soil.

1.9.3.1. Mitigation

- The top soil from 0 to 30cm to be removed and stockpile and to be used during the rehabilitation process.
- The top soil in the immediate vicinity of the sampling site should be removed and stored for re-cultivation during decommissioning.
- It is recommended that top soil to be removed down to the subsoil, where it is significantly thicker than 0.5m, as topsoil is always a scarce resource, and even if this lower material does not contain seed and is poorer in soil organisms, it has been found to be useful in reclamation.
- Where top soil is less than 150mm thick the unconsolidated material beneath should also be removed and treated as topsoil.
- Land markings and pits induced during sampling shall be restored to original landform and visual state as much as possible. Furthermore, this mitigation measure shall extend and applies to any disturbance induced by any access road. Raking or/and dragging with tyres could help in restoration of vehicle tracks.

1.9.4. Dust generation on site

During the exploration process dust will be generated onsite by earth moving equipment and also on the gravel road by trucks and vehicles. On site, During the mining process about 25% the original sepiolite is lost in the form of dust. In addition, processing of clay results in the formation of sepiolite dust, which is suspended in the air and which could be inhaled by the workers. Epidemiological studies indicates that workers exposed to dust stand an increased risk of suffering from asthma symptoms, chronic bronchitis, nasal inflammation and impairment of lung function (Camici et al., 1978; Angotzi et al., 2005; Leikin et al., 2009)

1.9.4.1. Mitigation

- Measures such as the use of wet processes enclosure of dust-producing processes under negative air pressure (slight vacuum compared to the air pressure outside the enclosure),
- Exhausting air containing dust through a collection system before emission to the atmosphere, and exhaust ventilation should be used in the workplace.
- Use of personal protective equipment for proper dust control for respiratory protection and should be used only where dust control methods are not yet effective or are inadequate.
- Direct skin contact should be prevented by gloves, wearing respiratory protection during cleanup,
- Educational awareness programs for workers should be instituted about hazard of exposure to clay dust and on the use and maintenance of exhaust ventilation systems, and the use and maintenance of personal protective equipment to avoid risk of dust and noise.
- All gravel roads in quarry areas should have a speed limit of 60km/h for light vehicles and 30km/h for heavy vehicles in order to minimise the amount of dust generated by vehicles.
- In addition, where available water allows, roads should be sprayed with water on a regular basis in order to prevent dust creation.

1.9.5. Biodiversity (fauna and flora)

Some of the activities of the proposed project i.e. vehicles, human movements, excavating pose a risk to the integrity of baseline biodiversity as well as the biological productivity of the site and the immediate proximity.

1.9.5.1. Mitigation

- Disturbed areas must be kept to a minimum
- Barriers/barricades confining driving trucks must be erected to avoid stray driving and trampling on habitat
- Rules pertaining to safe guarding against poaching and collection of plant and plant products must be established and enforced.
- Avoid damage to protected or high use value trees during mining and usage of heavy machines.
- Disturbance of marginal vegetation at the mountains should be limited.
- Avoid disturbance on invertebrate on site and along the gravel road stretch.
- During operation avoid the creation of multiples roads strips, which could result in the disturbance of breeding sites for various mammals.

1.9.6. Potential spread of HIV/AIDS

In the proposed project area, it is estimated that one out of every four people are HIV positive. Previous experience has shown that construction workers or mining workers residing in a construction camps may engage in risky sexual behaviour with members of the community. This can contribute to the spread of HIV both in the project area and beyond to other region.

1.9.6.1. Mitigation

- ECONO INVESTMENTS (PTY) LTD 's ECO should sensitize the risks of sexual behaviour, and also the effects of HIV/AIDS to its employees. Workers should be prohibited to engage in such activities with especially minors. In addition education in regard to compulsory use of masks and social distancing should be adhered to, as part of COVID 19 pandemic National regulations.

1.10. Implementing the environmental management plan (EMP)

1.10.1. Overview

In the preceding sections, the environmental aspects which may be affected by the proposed project have been categorized into negative and positive impacts. As an extension of the preceding sections, this section summarizes the objectives, indicators to be observed, schedules to be adhered to roles and responsibilities of various stakeholders to the EMP.

The following abbreviations are used to indicate who is responsible for what impact mitigation objective:

- Site Manager and Environmental Coordinator SM/ENCO
- Site Foreman SF
- Project Staff PS
- Project Proponent PP
- Environmental Impact Assessment Consultant EIA_C
- Environmental Commissioner EC
- Interested and Affected parties I&AP

Table 1: Project Planning and Implementation

| Objectives | Indicators | Schedule | Responsibility |
|--|---|---------------------------------------|----------------|
| Establish a strong environmental protocol from project implementation to final closure to ensure least possible impacts to the environment | Resources (Financial, human, equipment and safety gear) are provided for the awareness, meetings, monitoring and reporting. | At the beginning of the quarry phase. | PP, SM |
| | Expedite the appointment of a | At the planning | PP, I&AP |

| Objectives | Indicators | Schedule | Responsibility |
|---|--|---|----------------|
| To maximize the economic spin off into the local economy. | senior person to assume the responsibility of an environmental coordinator (ENC) | stage or at the beginning of the implementation phase of the quarry phase | |

Table 2: Implementing the EMP

| Objectives | Indicators | Schedule | Responsibility |
|--|--|---|----------------|
| To define roles and responsibilities according to the EMP | Staff and site visitors are aware of requirements and contents of the EMP | From the start to the closure of the quarry phase | ENC |
| To implement environmental management that is preventative and proactive | Inappropriate behavior will be corrected. Explanation as to why inappropriate behavior is unacceptable, and if appropriate the perpetrator is disciplined. | From the start to the closure of the quarry phase | ENC |

Table 3: Implementing of the Positive Impacts

| Objectives | Indicators | Schedule | Responsibility |
|--|--|--|-----------------------|
| The objective pertaining to creation of employment/job relates to an internal company policy of maximizing | At least 60 % of the semi-skilled to unskilled site workers should be locals | From the beginning of the quarry phase right through to the end. | SM, PP |

| Objectives | Indicators | Schedule | Responsibility |
|---|--|--|----------------|
| employing local people, particular in semi to unskilled job categories | | | |
| To maximize the economic spin off into the local economy and nation at large through export taxes and VAT payment | The town of Gobabis should first be considered in the procurement of services and equipment, particularly those which can be sourced locally | From the planning of the quarry phase right through to the end | PP, SM |

Since tourism is the major economic sector of the economy of Gobabis, it will be appropriate in this regard for the proponent to identify and make use of suitable services provides for both accommodation and recreational needs of senior personnel whenever that needsarises.

Table 4: Implementing of the Negative Impacts

| Objectives | Indicators | Schedule | Responsibility |
|---|---|--|----------------|
| To avoid any form of liter by paper, wires, human waste and drill bites on and around the mining site | No litter or/and remnants of liter shall be visible around the project site | From the beginning of the quarrying phase right through to the end | SF, PS, SM |
| To avoid any form of oil spills on and around the mining | No oil spillage or/and remnants of oil spillage shall be visible around the | From the beginning of the quarry phase right through to the | SF, PS |

| Objectives | Indicators | Schedule | Responsibility |
|---|--|---|----------------|
| site | project site | end | |
| To minimize land and soil disturbance | Driving tracks and excavation shall be restricted and only be visible within the project site. | From the beginning of the quarry phase right through to the end | SM, SF |
| To minimize dust generation on site and atmospheric pollution | Emissions/generation particulate content of the dust around the site and gravel roads shall not exceed maximum allowable concentration that may affect human being and animals. Mitigation measures prescribed under sub-section 1.9.4.1 should be adhered to. | From the beginning of the quarry phase right through to the end | SM,SF |
| To protect and conserve fauna and flora within the project area | Minimum levels of habitat disturbance as prescribed in sub-section 1.9.5.1 should be adhered to. | From the beginning of the quarry phase right through to the end | SM,SF |
| To prevent the potential spread of HIV/AIDS | No potential spread of HIV/AIDS by the employees and mitigation measures prescribed in sub-section 1.9.6.1 should be adhered to | From the beginning of the quarry phase right through to the end | SM,SF |
| To ensure compliance with statutory requirements | Assurance measures shall be put in place and Periodic inspections aimed at corrective action undertaken, recorded and documented | From the beginning of the quarry phase right through to the end | EC, PP |

1.11. Monitoring, reporting and corrective action

1.11.1. Overview

Monitoring of the EMP performance for the proposed small scale surface mining project by ECONO INVESTMENTS (PTY) LTD emphasizes early dictation, reporting and corrective action. It is divided into three parts, namely:

- Monitoring of activities and effects to be undertaken by the environmental coordinator (ENC)
- Reporting of all incidents and situations which have the potential of jeopardizing compliance of statutory provisions as well as provisions of this EMP.
- Taking corrective measures which are prompt, adequate and long lasting in addressing non-compliance activities or behaviour.

Table 5: Solid waste disposal: wire, paper, drill bites, and humanwaste

| Mitigation | Compliance | Action Required | By Whom | When | Date Completed |
|---|------------|-----------------|---------|------|----------------|
| Are disposal drums/bins available or full? | | | | | |
| Is there any litter around the site and its surroundings? | | | | | |

Table 6: Oil spillage or used oil

| Compliance | Action | By Whom | When | Completed | Required |
|---------------------------------|--------|---------|------|-----------|----------|
| Are disposal drums available or | | | | | |

| | | | | | |
|---|--|--|--|--|--|
| full? | | | | | |
| Is there any oil spills around the site and its surroundings? | | | | | |

Table 7: Land and Soil Disturbance

| Mitigation | Compliance | Follow up Action Required | By Whom | When | Date Completed |
|---|------------|---------------------------|---------|------|----------------|
| Are there any deviations from the provisions of the EMP on land and soil disturbance? | | | | | |
| Are car track barricades in place? | | | | | |

Table 8: Dust generation on site and gravel roads stretch

| Mitigation | Compliance | Follow up Action Required | By Whom | When | Date Completed |
|--|------------|---------------------------|---------|------|----------------|
| Are there any deviations from the provisions of the EMP on dust pollution? | | | | | |
| Are the fume and particulate levels acceptable? | | | | | |

Table 9: Biodiversity (fauna and flora)

| Mitigation | Compliance | Follow up Action Required | By Whom | When | Date Completed |
|--|------------|---------------------------|---------|------|----------------|
| Are there any deviations from the provisions of the EMP on biodiversity? | | | | | |
| It is traipses harvesting plant taking place feeding of animal or introduction of animals? | | | | | |

Table 10: Compliance

| Mitigation | Compliance | Follow up Action Required | By Whom | When | Date Completed |
|---|------------|---------------------------|---------|------|----------------|
| Are staff members and site visitors aware of the provisions of the EMP? | | | | | |
| Is there a copy of the EMP on site? | | | | | |
| Ask at least two people on various provisions of the EMP? | | | | | |

1.12. Environmental awareness

Environmental regulations, rules and procedures apply to everybody, including subcontractors, visitors, permanent and temporal workers. Therefore anybody who finds him or herself within the boundaries of the mining area must adhere to the Environmental Code of Conduct as outlined in this section of the EMP.

- The term environment refers to the whole surrounding around us, or conditions in which a person, animal, or plant lives or operates. In context of this project, the term environment denotes the natural surroundings in a particular geographical area, especially as affected by human activity.
- The environmental coordinator will implement on site environmental guidelines and has the authority to issue warnings as well as discipline any person who transgresses environmental rules and procedures. Persistent transgression of environmental rules will result in a disciplinary hearing and thereafter continued noncompliance behaviour will result in permanent removal from the mining site.
- Continuous assistance from the environmental coordinator must be maintained in case some members of the project team do not understand or do not know how to keep up with established environmental guidelines.

1.12.1. Natural environment management guidelines

- a. Never feed, tease or play with, hunt, kill, destroy or set devices to trap any wild animal (including birds, reptiles and mammals), livestock or pets. Do not bring any wild animal or pet to the mining site;
- b. Do not pick any plant or take any animal out of the mining area EVER. You will be prosecuted and asked to leave the project area;
- c. Never leave rubbish and food scraps or bones where it will attract animals, birds or insects. Rubbish must be thrown into the correct rubbish bins or bags provided;
- d. Protect the surface material by not driving over it unnecessarily;
- e. Do not drive over, build upon, or camp on any sensitive habitats for plants and animals;
- f. Do not cut down any part of living trees / bushes for firewood;
- g. Do not destroy bird nest, dens, burrow pits, termite hills etc. or any other natural objects in the area.

1.12.2. Vehicle use and access guidance

- i. Never drive any vehicle without a valid licence for that particular vehicle and do not drive any vehicle that appears not to be road-worthy;
- ii. Never drive any vehicle when under the influence of alcohol or drugs;
- iii. DO NOT make any new roads without permission. Stay within demarcated areas;
- iv. Avoid U-Turns and large turning circles. 3-point turns are encouraged. Do not ever drive on rocky slopes;
- v. Stay on the road, do not make a second set of tracks and do not cut corners;
- vi. DO NOT SPEED - 60 km per hour for normal vehicles and 30km per hour for heavy trucks on gravel roads and around the site;
- vii. No off-road driving is allowed;
- viii. Vehicles may only drive on demarcated roads;
- ix. Adhere to speed limits (i.e. 60 km per hour for normal vehicles and 30km per hour for heavy trucks on gravel roads and around the site) and drive with headlights switched on along any gravel road.

1.12.3. Control of dust guidance

- a. Do not make new roads or clear any vegetation unless instructed to do so by your Contractor or the Environmental Coordinator or site manager;
- b. Do not try to disturb the surface of the natural landscape as little as possible.
- c. Do not speed on gravel roads and around the mining site, and adhere to the speed limits.
- d. Apply water to suppress the dust where the generation of the dust on either gravel roads or mining site is beyond control.

1.12.4. Health and safety guidance

- a. Drink lots of water every day, but only from the fresh water supplies;
- b. Take the necessary precautions to avoid contracting the HIV/AIDS virus;
- c. Never enter any area that is out of bounds, or demarcated as dangerous or wander off without informing or permission of team leader;
- d. Never climb over any fence or trespass on private property without permission of the landowner or consultation with the Environmental Coordinator, Site Manager;

- e. Report to your Contractor if you see a stranger or unauthorised person in the exploration area;
- f. Do not remove any vehicle, machinery, equipment or any other object from the exploration camp site or along the profile or at a seismic testing station without permission of your Contractor or Site Manager;
- g. Wear protective clothing and equipment required and according to instructions from your Contractor or Site Manager;
- h. Do not engage in sexual relationship with minor and also adhere to zero tolerance to spread HIV/AIDS.

1.12.5. Preventing pollution and dangerous working conditions guidance

- I. Never throw any hazardous substance such as fuel, oil, solvents, etc. into streams or onto the ground;
- II. Never allow any hazardous substance to soak into the soil;
- III. Immediately tell your Contractor or Environmental Coordinator when you spill, or notice any hazardous substance being spilled anywhere in the field or camp;
- IV. Report to your Contractor or Environmental Coordinator when you notice any container, which may hold a hazardous substance, overflow, leak or drip;
- V. Immediately report to your Contractor or Environmental Coordinator when you notice overflowing problems or unhygienic conditions at the ablution facilities, vehicles, equipment and machinery, containers and other surfaces.

1.12.6. Disposal of solid and liquid waste guidance

- a. Learn to know the difference between the two main types of waste, namely: General Waste; and Hazardous Waste.
- b. Learn how to identify the containers, bins, drums or bags for the different types of wastes. Never dispose of hazardous waste in the bins or skips intended for general waste or exploration rubble;
- c. Never burn or bury any waste on the camp or in the field;
- d. Never overfill any waste container, drum, bin or bag. Inform your Contractor or the Environmental Coordinator/ the Project Geologist / Site Manager if the containers, drums, bins or skips are nearly full;
- e. Never litter or throwaway any waste on the site, in the field or along any road.
- f. No illegal dumping;
- g. Littering is prohibited.

1.12.7. Dealing with environmental complaints guidance

- a. If you have any complaint about dangerous working conditions or potential pollution to the environment, immediately report this to the Environmental Coordinator
- b. If any person complains to you about noise, lights, littering, pollution, or any other harmful or dangerous condition, immediately report this to your Contractor.

1.12.8. Environmental Personnel Register

Table 11 shows the Environmental Personnel Register to be signed by every person who receives or attends the Environmental Awareness Training or who has the training material explained to him or her or in possession of the training material.

Table 11: Environmental Personnel Register

| Date | Name | Company | Signature |
|------|------|---------|-----------|
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1.13. Site closure and rehabilitation

In the context the proposed project, rehabilitation refers to the process of returning disturbed land and soil to some degree of its pristine state. The scope of the ECONO INVESTMENTS (PTY) LTD site rehabilitation emphasizes the backfilling of sampling/drilling holes and cover with top soil in areas that will be disturbed by mining/quarrying activities. These will be but not limited to the access road, vehicle tracks around the site, removal and restoration of areas covered by stockpile and rock piles. Furthermore, this section outlines rehabilitation objectives and proposes rehabilitation commitments which the proponent shall adhere to.

1.13.1. Objectives of the site closure and rehabilitation

- Reduction or elimination of the need for a long term management program to control and minimize the long term impacts.
- Clean up, treatment or restoration of disturbed or/and contaminated areas.

In addition, the following rehabilitation measures are important and should be implemented wherever necessary:

- A site inspection will be held after completion of the mining process to determine the nature and scope of the rehabilitation work to be undertaken. The rehabilitation will be done to the satisfaction of both ECONO INVESTMENTS (PTY) LTD and MET.
- The rehabilitation work should commence soon after the end the active mining period.
- The access road and all vehicle tracks should be rehabilitated by raking or dragging with tyres or tree branches (other suitable methods) behind a vehicle.
- With regard to both biological productivity and erosion, topsoil is arguably the most important resource in the project area, for that reason, the recovered topsoil and subsoil should be utilized to reconstruct the original soil profile.
- All waste shall be removed, and potential hazards, particularly pits closed and left in a safe disposition.
- All rehabilitated areas shall be considered no go areas and the environmental coordinator shall ensure that none of the staff members enters the area after rehabilitation.

2. Conclusion and recommendations

2.1. Conclusion

The fundamental principle behind environmental assessments (EAs) is to ensure a balance in social, economic and environmental needs, particularly when proposed projects are of such a nature that they negatively affect some needs at the expense of the other. Ultimately, EAs should enhance proposed projects' propensity towards being more beneficial and important by suggesting measures, designing and implementing programs and plans to that effect.

Against this background, it is anticipated that this project will be beneficial and important to the proponent, national economy, the local social conditions and the local economy if the guidelines and mitigation measures suggested in this EMP are implemented. However, it should be acknowledged that disturbance to the environment will be incurred, but that will be minimal and within legally acceptable levels.

This EMP should be viewed as a framework for integrating mitigation measures and applicable legal tools to ensure both compliance and sustainability. It is therefore very important that the proponent provides adequate resources (human, financial, tangible and intangible assets) for the implementation of the plan.

2.2. Recommendations

The proposed quarry project may go ahead provided that all the provisions of the EMP as well as all issued permit are followed. Recommended actions to be implemented by ECONO INVESTMENTS (PTY) LTD as part of the management of the likely impacts through implementations of the EMP are:

- Contract an Environmental Coordinator / Consultant / suitable in-house resources person to lead and further develop, implement and promote environmental culture through awareness raising of the workforce, contractors and sub-contractors in the field during the whole duration of the proposed mining programme period;

- Provide with other support, human and financial resources, for the implementation of the proposed mitigations and effective environmental management during the planned mining activities ;
- Develop a simplified environmental induction and awareness programme for all the workforce, contractors and sub-contractors;
- Where contracted service providers are likely to cause environmental Impacts, these will need to identified and contract agreements need to be developed with costing provisions for environmental liabilities;
- Implement internal and external monitoring of the actions and management strategies developed during the mineral exploration and possible mining duration and a final Environmental Monitoring report be prepared by the Environmental Coordinator / Consultant / Suitable in-house resource person and to be submitted to the regulators and to end the proposed quarry project;
- Develop and implement a monitoring programme that will fit into the overall company's Environmental Management Systems (EMS) as well as for any future EIA for possible quarrying projects.

It is hereby recommended that ECONO INVESTMENTS (PTY) LTD take all the necessary steps to implement all the recommendations of the EMP for the successful implementation and completion of the proposed clay quarry project in EPL 5758 situated in the Gobabis, Omaheke Region, Namibia.

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