



Draft Environmental Management Plan (EMP)

**Environmental Scoping Assessment (ESA) for
Prospecting and Exploration Activity on Exclusive
Prospecting Licence (EPL) No. 7327 located near of
Omatjete in the Erongo Region, Namibia**

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1 INTRODUCTION

1.1 Project Background

Theresia Jeaneth Aochamus (*The Proponent*) is the holder of EPL No. 7327 through a joint venture with Damaran Exploration Namibia (Pty) Ltd. EPL 7327 was granted in 2019 by the Ministry of Mines and Energy (MME). The tenure for exploration on the EPL is granted for works between 06 March 2019 and 05 March 2022. The Proponent intends to acquire an Environmental Clearance Certificate (ECC) to enable prospecting and exploration activity on the EPL. The Proponent focuses on acquisition, exploration and development of Base Metals and, Precious Metals on the EPL. The project area is located about 47 km northwest of Omatjete Settlement, and is accessible via the D3712 road and the D3718 roads, which pass through the EPL. The locality map of the EPL 7327 is shown in **Figure 1**.

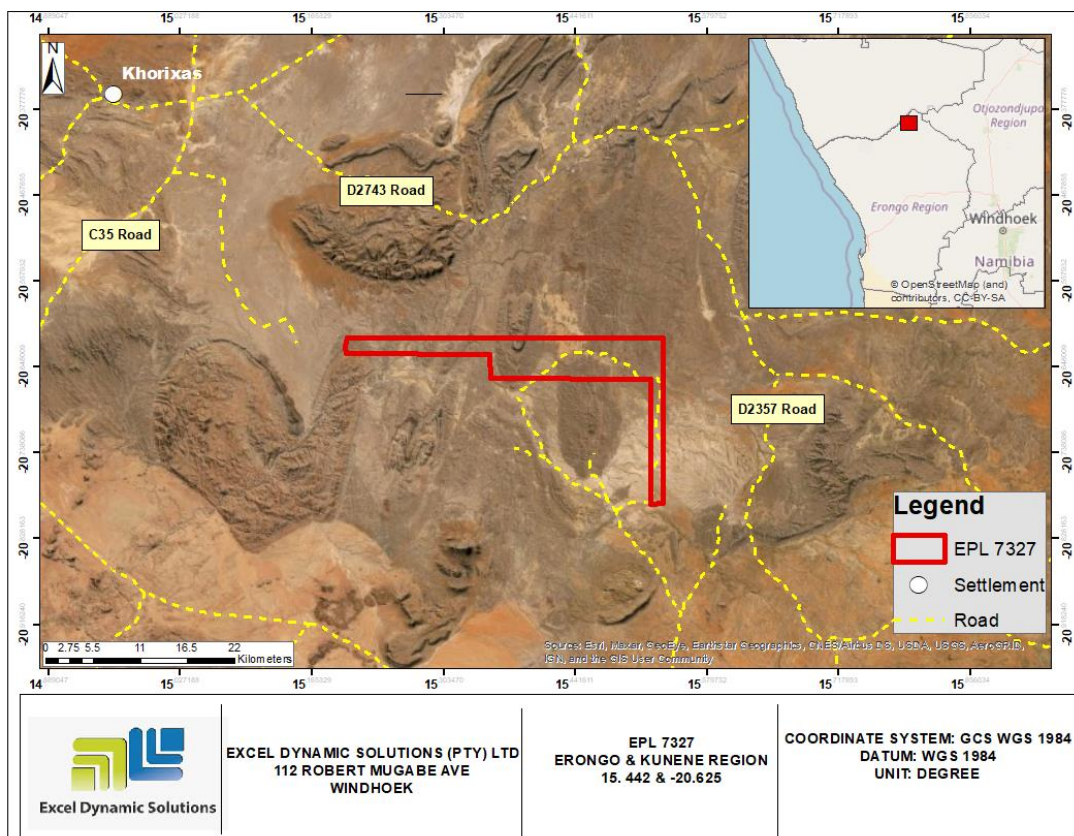


Figure 1: Location of EPL No. 7327 located near Omatjete in the Erongo Region.

In terms of section 27 (1) of the Environmental Management Act (EMA), no. 7 of 2007 and in line with Sections 32-37 of the EMA Regulations as gazetted in 2012, the proposed prospecting and exploration activities on the EPLs form part of the listed activities that may not be conducted without an EIA being undertaken and an ECC obtained. The relevant listed activities as per EIA regulations are:

- *3.1 The construction of facilities for any process or activities which requires a license, right of other forms of authorization, and the renewal of a license, right or other form of authorization, in terms of the Minerals (Prospecting and Mining Act, 1992).*
- *3.2 other forms of mining or extraction of any natural resources whether regulated by law or not.*
- *3.3 Resource extraction, manipulation, conservation and related activities.*

This document has been prepared as per requirement in accordance with Section 8 of the EMA, No. 7 of 2007 and its 2012 EIA regulations. The compilation of this EMP was also one of the outputs required of the Environmental Consultant (Environmental Assessment Practitioner (EAP), by The Proponent. It is required of the Environmental Consultant to comply with the EMA and provide for the following:

- Prepare an explicit Environmental Management Plan to be used as a guideline to monitor compliance to the recommendations stipulated in the EIA and to assist in managing and monitoring activities throughout the operation and maintenance of the proposed mining activities on the EPL.
- The Environmental Consultant must clearly elucidate in the EMP the roles and responsibilities of the Proponent, the contractors and any other identified stakeholders.

1.2 Aim of the Draft Environmental Management (EMP)

Regulation 8(j) of the EIA Regulations (2012) requires that a draft Environmental Management Plan (EMP) shall be included as part of the Environmental Assessment (EA) scoping report. A 'Management Plan' is defined as:

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

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

The purpose of this document is, therefore, to guide environmental management throughout the different phases of the proposed exploration activities, namely: operation and maintenance phase, and decommissioning phase:

- **Operation and Maintenance** - This is the phase where The Proponent will do prospecting and exploration activities for the targeted commodities groups and undertake related activities on site. It is also the phase during which maintenance of the area, equipment and machinery is done by The Proponent.
- **Decommissioning and Rehabilitation** – This is the phase during which the exploration activities on the EPL cease. The decommissioning of the exploration operations may be considered as a result of poor exploration results or declining in the focus commodity market price. Before the decommissioning phase, The Proponent will need to put site rehabilitation measures in place.

Environmental Monitoring Requirements: To support and ensure that the proposed mitigation measures are achieving the desired results, a monitoring plan must be implemented alongside the mitigation plan.

This draft EMP will be used by The Proponent, employees and/or contractors to provide management measures to be undertaken during mining activities, to address the environmental impacts identified in the scoping report and ensure that the impacts on the environment are avoided or limited if they cannot be avoided completely.

1.3 Environmental Assessment Legal Requirements

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

The Proponent, therefore, has the responsibility to ensure that the exploration activities as well as the ESA process conform to the principles of the EMA and must ensure that employees act in accordance with such principles. **Table 1** below lists the requirements of an EMP as stipulated by Section 8 (e) of the EIA Regulations, primarily on specific approvals and permits that may be required for the activities required of the EPL.

Table 1: Applicable legal requirements and permits to the activities of the EPL.

Legislation/Policy/ Guideline	Relevant Provisions	Implications for this project
Environmental Management Act EMA (No 7 of 2007)	Requires that projects with significant environmental impacts are subject to an environmental assessment process (Section 27). Details principles which are to guide all EAs.	The EMA and its regulations should inform and guide this EA process. Should the ECC be issued to the Proponent, it should be renewed every 3 years, counting from the date of issue.
Environmental Impact Assessment (EIA) Regulations GN 28-30 (GG 4878)	Details requirements for public consultation within a given environmental assessment process (GN 30 S21). Details the requirements for what should be included in a Scoping Report (GN 30 S8) and an Assessment Report (GN 30 S15).	
Minerals (Prospecting and Mining) Act (No. 33 of 1992)	Section 48 (3): To enable the Minister to consider any application referred to in section 47 the Minister may (b) require the person concerned by notice in writing to (i) carry out or cause to be carried out such environmental impact studies as may be specified in the notice. Section 54(2): details provisions pertaining to the decommissioning or abandonment of a mine.	The Proponent should ensure that all necessary permits/authorization for these EPL are obtained from the Ministry of Mines and Energy (MME).

Legislation/Policy/ Guideline	Relevant Provisions	Implications for this project
	Under this Act (Section 51 (1a)), holder of a mineral license cannot exercise any rights on a private land until the holder has entered into an agreement with the owner regarding payment of compensation	The Proponent should timely enter into and sign access and land use agreement (consent) with respective affected farm owners or representatives of the occupiers of land.
Traditional Authority Act (Act No. 25 of 2000)	The Act also stipulates that Traditional Authorities (Tas) should ensure that natural resources are used on a sustainable basis that conserves the ecosystem. The implications of this Act are that TAs must be fully involved in the planning of land use and development for their area. It is the responsibility of the TA's customary leaderships, the Chiefs, to exercise control on behalf of the state and the residents in their designated area.	The EPL considered under this project is predominantly located in Omatjete Settlement, which is communal land under the Zeraeua Traditional Authority (ZTA) in Omatjete. Therefore, ZTA should be consulted throughout the project.
Petroleum Products and Energy Act (No. 13 of 1990) Regulations (2001)	Regulation 3(2)(b) states that "No person shall possess or store any fuel except under authority of a licence or a certificate, excluding a person who possesses or stores such fuel in a quantity of 600 litres or less in any container kept at a place outside a local authority area"	The Proponent should obtain the necessary authorisation from the MME for the storage of fuel on-site.
Labour Act 11 of 2007 Health and Safety Regulations (HSR) GN 156/1997 (GG 1617).	Adhere to all applicable provisions of the Labour Act and the Health and Safety regulations.	Division of Labour Services at the Ministry of Labour, Industrial Relations and Employment Creation.
Forestry Act 12 of 2001, Amended Act 13 of 2005	Prohibits the removal of any vegetation within 100 m from a watercourse (Forestry Act S22 (1)). The Act prohibits the removal of and transport of various protected plant species.	Should there be protected plant species, which are known to occur within the project site, these are required to be removed and a permit should be obtained from the nearest Forestry office (Ministry of Environment, Forestry and Tourism (MEFT)) prior to removing them.

Legislation/Policy/ Guideline	Relevant Provisions	Implications for this project
National Heritage Act No. 76 of 1969	Call for the protection and conservation of heritage resources and artefacts.	Should any archaeological material, such as bones, old weapons/equipment etc. be found on the EPL site, work should stop immediately, and the National Heritage Council of Namibia must be informed as soon as possible. The Heritage Council will then decide to clear the area or decide to conserve the site or material.
Road traffic and transport Act 52 of 1999 and its 2001 Regulations	Provides for the control of traffic on public road and the regulations pertaining to road transport, including the licensing of vehicles and drivers.	Road and vehicle use safety

1.4 Draft EMP Limitations

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

- This EMP has been drafted based on the ESA conducted for targeted prospecting and exploration for Base Metals and Precious Metals on the EPL located near Omatjete in the Erongo Region.
- The mitigation measures recommended in this EMP document are based on the risks/impacts in the ESA Report which were identified based on the project description as provided by the Proponent, site investigation and public input. Should the scope of the proposed project change, the risks/impacts will have to be reassessed and mitigation measures provided accordingly.

2 EMP ROLES AND RESPONSIBILITIES

The Proponent is ultimately responsible for the implementation of the EMP. However, the Proponent may delegate this responsibility at any time, as they deem necessary during the project phases. The roles and responsibilities of all delegates/parties involved in the effective implementation of this EMP are set out below:

2.1 Competent Monitoring Authority: Department of Environmental Affairs and Forestry (DEAF, MEFT)

The DEAF is responsible for enforcing compliance with the EMA, its regulations and full implementation of this EMP. The competent authority also reviews biannual reports and may grant ECC renewal after 3 years following an environmental audit.

2.2 The Proponent or Proponent's Representative (PR)

If the Proponent does not personally manage all aspects and phase activities referred to in this EMP, they should assign this responsibility to a suitably qualified individual referred to in this plan as the Proponent's Representative (PR). The PR may be appointed to manage all phases of the project, or to manage only the EMP aspects for the project. The PR's responsibilities may include:

- Managing the implementation of this EMP and updating and maintaining it when necessary.
- Management and monitoring of individuals and/ or equipment on-site in terms of compliance with this EMP.
- Issuing fines for contravening EMP provisions.

2.3 Site/Project Manager (as appropriate)

This individual(s) will be responsible to ensure that the exploration activities of the project are completed on time. The manager's duties and responsibilities will include:

- Ensure that relevant commitments contained in the EMP Action Plans are adhered to.
- Ensure relevant staff is trained in procedures entailed in their duties.
- Maintain records of all relevant environmental documentation for the project.
- Reviewing the EMP annually and amending the document when necessary.

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- Issuing fines to individuals who may be in breach of the EMP provision and if necessary, removing such individuals from the site.
- Cooperate with all relevant interested and affected parties/stakeholders.
- Development and management of schedules for daily activities.

2.4 Environmental, Health & Safety (EHS) Officer or Environmental Control Officer (ECO)

The Proponent may assign the responsibility of ensuring EMP compliance throughout the project life cycle to a designated member of staff or external qualified and experienced person, referred to in this EMP as the Environmental Control Officer (ECO) or Safety, Health & Environment, (SHE) Officer. The ECO/SHE will have the following responsibilities:

- Management and facilitation of communication between the Proponent, PR and Interested and Affected Parties (I&APs) regarding this EMP.
- Conducting site inspections (recommended frequency is monthly during the operation phase and bi-annually for the operation and maintenance) of all areas with respect to the implementation of this EMP (monitor and audit the implementation of the EMP).
- Advising the PR on the removal of person(s) and/or equipment not complying with the provisions of this EMP.
- Making recommendations to the PR with respect to the issuing of fines for contraventions of the EMP.
- Undertaking an annual review of the EMP and recommending additions and/or changes to this document.
- Ensuring that the operational activities on site operate according to the International System organization (ISO) standard 14001: 2015.

Archaeology: Chance Finds Procedure (CFP) Implementation Roles

The following personnel have been assigned responsibilities as per the Chance Finds procedure (Appendix 1):

- **Operator:** To exercise due caution if archaeology remains are found.
- **Foreman:** To ensure site and advise management timeously.
- **Superintendent:** To determine safe working boundary and request inspection.

- **Archaeologist:** To inspect, identify, advise management, and recover remains.

The Proponent should assess these commitments in detail and should acknowledge their obligation to the specific management actions detailed in the Tables under the following sections.

3 ENVIRONMENTAL MANAGEMENT & MITIGATION MEASURES

3.1 Management of Key Potential Environmental Impacts

From the assessment conducted, the following key potential negative impacts have been identified per project phase and are summarized in **Table 2** below.

Table 2: Summary of key potential environmental impacts per project phase

	Project Phase	Potential negative impacts identified in the EA
1	Exploration (Operation and maintenance) phase	Biodiversity loss, dust generation, Occupational Health and safety risks, Scars to landscape, Waste generation, Noise.
2	Decommissioning	Loss of the natural physical state at sites of exploration, Loss of employment by workers at the exploration site and contribution to the national economy.

3.2 Aim of the Environmental Management Plan Actions

The aim of the management actions of the EMP is to avoid potential negative impacts where possible. Where impacts cannot be avoided, measures are provided to reduce the significance of these impacts.

Management actions recommended for the potential impacts rated in the ESA carried out for the exploration activities were based on the three project phases listed below:

- Planning, Prospecting and Exploration (Operations/operation & maintenance) phases (**Table 3**)
- Monitoring (**Table 4**)
- Decommissioning and Rehabilitation (section 2.5).

The responsible person(s) should assess these actions in detail and acknowledge their commitment to the specific management actions detailed in the phases given under the following subsections.

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3.3 Planning, Prospecting and Exploration Phase Management Action Plans (Mitigation Plan)

The management action plans recommended for this phase are presented in **Table 3** below.

Table 3: Management and mitigation action plans for the planning and exploration phases

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Party	Resources	Timeline
PLANNING PHASE						
EMP implementation and training	Lack of EMP awareness and implications thereof	<p>-A Comprehensive Health and Safety Plan for the project activities should be compiled. This will include all the necessary health, safety, and environmental considerations applicable to respective works on sites.</p> <p>An EMP non-compliance penalty system should be implemented on site.</p> <p>The Proponent should appoint an EHS Officer to be responsible for managing the EMP implementation and monitoring.</p>	<p>-All required Plans and systems are compiled and in place.</p> <p>and ECO/EHS Officer is appointed</p>	Proponent	EMP implementation Plans and Systems	Pre-exploration works
Authorizations	Lack of Agreements, Permits/ Licenses	<p>-All the required agreements and licenses or permits should be applied for and signed, respectively before commencement of work on the EPL, or as required.</p> <p>-The permits, agreements referred to herein include land access & use permits, waste management disposal permits, water supply agreements,</p>	<p>-Applicable permits and licenses are obtained from relevant authorities and kept on site for record keeping and future inspections.</p>	Proponent	Proponent Respective authorities and services provider(s)	Prior to exploration works

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		and should there be fuel handling on site, petroleum storage permits.				
Communication between the Proponent and other land users and custodians	Lack of communication (proper liaison) between Proponent and property owners or other land users regarding land use.	<ul style="list-style-type: none"> -The Proponent should appoint a Public Relation Officer (PRO) to liaise with the land users, property owners and/or custodians. -A clear communication procedure/plan which should include a grievance mechanism. 	<ul style="list-style-type: none"> A PRO is appointed -Ongoing Stakeholders' and Public Engagement & Consultation throughout the project cycles, when and as required. PRO contact details to be provided to the affected land users and custodian 	Proponent	<ul style="list-style-type: none"> PRO Complaint's logbook 	PRO appointment (Prior to project activities) and their responsibilities throughout the project activities
Employment	Creation of employment opportunities	<ul style="list-style-type: none"> -Non-skilled labour should be sourced locally among the local community, in accordance with procedures approved by the relevant authorities. -Equal opportunity should be provided for both men and women, when and where possible. 	-Number of locals employed for exploration activities	Proponent in collaboration with the Site/Project Manager (if necessary)	Record of employees	Pre-project activities and when necessary, throughout

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Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Party	Resources	Timeline
Specialised procurement of services	Exploration Contractors and services	-All services related to exploration activities such as trenching/pitting and drilling that the Proponent may need, preference should be given to local providers of such services. If not available locally, the services search should be extended to a regional level (Erongo Region), nationally and lastly, internationally.	Number of hired contractors.	Proponent Site/Project Manager	Record of hired or contracted companies or services providers	Pre-project activities and when necessary, throughout
PROSPECTING AND EXPLORATION PHASE						
EMP implementation and training	Lack of EMP awareness and implications thereof	-EMP trainings should be provided to all new workers on site. -All site personnel should be aware of necessary health, safety, and environmental considerations applicable to their respective work. -The implementation of this EMP should be monitored. The site should be inspected, and a compliance audit done throughout the project activities, monthly. An EMP non-compliance penalty system should be implemented on site.	Compliance monitoring conducted monthly for the operational phase and should be recorded.	EHS Officer	Bi-annual reports Records of EMP training conducted.	Throughout the exploration phase and as required
Communication between the Proponent and other	Lack of communication (proper liaison) between other	-The PRO should be introduced to the neighbouring land users or the representative and his or her contact details provided to them prior to	PRO is part of the project personnel.	PRO	Complaint's logbook	Throughout the exploration activities

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Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Party	Resources	Timeline
neighbouring land users and custodians	land users and Proponent with regards to land use	undertaking activities for easy communication during exploration activities. The Proponent should compile a clear communication procedure/plan which should include a grievance and response mechanism.	Ongoing Stakeholders' and Public Engagement & Consultation throughout the project cycles, when and as required		PRO contact details to be provided to the affected land users. Records of Stakeholders' and Public Consultations	
Water Resources Use	Over-abstraction (water demand and availability)	-Abstraction of water from local aquifers should be avoided at all costs by ensuring that part of the required water is sourced from the Omatjete Settlement (through agreed purchase) and or augmented by carted water from areas with better supply. -The Proponent should prioritize carting water from outside the project area and reach an agreement with the Zeraeua Traditional Authority to supply water for drinking (to augment the project water needs). -Although water will not be abstracted from the local aquifers, the water user (Proponent) should be water-use conscious and consider voluntary water use reduction by sticking to their	Water supply agreements Proof/ recording/ quantification of water saving efforts.	Proponent Site/Project Manager	Water supplier Proponent Water storage tanks on site	Once off supply agreement Throughout the exploration phase

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Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Party	Resources	Timeline
		<p>proposed threshold volumes or less when more water is not really required.</p> <p>-The Proponent should aim to use water efficiently, recycle and re-use where necessary and possible.</p> <p>-Water reuse/recycling methods should be implemented as far as practicable for exploration activities. The water used to cool off operational equipment should be captured and used for the cleaning of project equipment, if possible.</p> <p>-Water conservation awareness and saving measures training should be provided to all the project workers to promote water conservation and staff accountability.</p>				
Soils	Physical soil/land disturbance and loss of topsoil	<p>-Overburden soils and rocks should be handled efficiently during operations to avoid soil erosion.</p> <p>-Stockpiled topsoil and drill material should be used to backfill the excavated and disturbed site areas/spots.</p> <p>-Soils beyond the intended and targeted footprint of the site should be left undisturbed and soil conservation implemented as far as possible.</p> <p>-Project vehicles and machinery should stick to access roads meant for project</p>	<p>No proliferation of informal vehicle tracks.</p> <p>No new erosion gullies.</p>	EHS Officer/ECO	<p>Proponent</p> <p>All personnel</p> <p>Complaints logbook</p>	Throughout the exploration phase

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Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Party	Resources	Timeline
		<p>operations and avoid further creation of new tracks on site, to prevent unnecessary and long term tracks and soil compaction, leading to soil erosion..</p> <p>-The disturbance of the soil surface in the vicinity of the working sites must be minimal to prevent erosion by wind.</p> <p>-The project footprint area should not be cleared entirely, and the operational vehicles and equipment must be placed in such a way that soil disturbance is minimised, and the site should be rehabilitated after each onsite work.</p>				
Soils and water resources	Soils and water resources pollution	<p>-Oil and wastewater spill control preventive measures should be in place on site to manage soil contamination, thus preventing and minimizing the contamination from reaching water resources bodies. Some of the soil control preventive measures that can be implemented include:</p> <p>-Identification of oil storage and use locations on site and allocate drip trays and polluted soil removal tools suitable for that specific surface (soil or hard rock cover) on the sites.</p> <p>-Maintain equipment and fuel storage tanks to ensure that they are in good</p>	<p>No complaints of pollutants on the soils and eventually in the water due to exploration activities</p> <p>No visible oil spills on the ground or pollution spots.</p>	EHS Officer	<p>Complaint's logbook</p> <p>Waste containers</p> <p>Non-permeable material to cover the ground surface at areas where hydrocarbons and potential pollutants are utilized.</p>	Throughout exploration phase

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Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Party	Resources	Timeline
		<p>condition thus preventing leaks and spills.</p> <p>-The oil storage and use locations should be visually inspected for container or tank condition and spills.</p> <p>-Maintain a fully provisioned, easily accessed spill kit, including drip trays. Spill kits should be located throughout the active project sites and contain floor dry absorbent material and absorbent booms, pads, and mats suitable for ground surface areas that are covered mainly by hard rocks.</p> <p>-All project employees should be sensitized about the impacts of soil pollution and advised to follow appropriate fuel delivery and handling procedures.</p> <p>-The Proponent should develop and prepare countermeasures to contain, clean up, and mitigate the effects of an oil spill. This includes keeping spill response procedures and a well-stocked cache of supplies easily accessible.</p> <p>-Ensure employees receive basic Spill Prevention, Control, and Countermeasure (SPCC) Plan training</p>				

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Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Party	Resources	Timeline
		<p>and mentor new workers as they get hired.</p> <p>-The EPL site areas where hydrocarbons will be utilized, the surface should be covered with an impermeable plastic liner (e.g., an HDPE liner), carefully placed to minimize risk of puncturing, to prevent any spillages from getting into direct contact with the soils and prevent eventual infiltration into the ground.</p> <p>-Project machines and equipment should be equipped with drip trays to contain possible oil spills when operated on site.</p> <p>-In cases of accidental fuel or oil spills on the soils from site vehicles, machinery and equipment, the polluted soil should be removed immediately and put in a designate waste type container for later disposal as per the preceding bullet point. The removed polluted soil should either be completely disposed of or cleaned and returned to where it was taken from on site or can be replaced with a cleaner soil. This is to ensure that the pollutants contained in the soil does not infiltrate into the site soils and eventually reach to groundwater.</p>				

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Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Party	Resources	Timeline
		<p>-If any accidental pollution occurs on site soil, the polluted soil must be collected and transported away from the site to an approved and appropriately classified hazardous waste treatment facility.</p> <p>-Washing of equipment contaminated hydrocarbons, as well as the washing and servicing of vehicles should take place at a dedicated area, where contaminants are prevented from contaminating soil or water resources.</p>				
Biodiversity	Loss of Fauna and Flora	<p>Fauna</p> <p>-Poaching (illegal hunting) of wildlife from the area is strictly prohibited.</p> <p>-The project workers should refrain from killing or snaring the locals' livestock that may be found on and around the site.</p> <p>Workers should refrain from disturbing and poaching animal species found within the EPL and surrounding areas.</p> <p>-Access roads (even existing ones) should be utilized appropriately in a manner that disturbs minimal land areas as possible, thus minimizing faunal habitat destruction.</p>	<p>No disturbance to unmarked areas.</p> <p>No complaints from locals regarding unauthorised vegetation removal or cutting down of trees.</p> <p>No complaints of wildlife hunting by the project personnel.</p> <p>No intentional disturbance and destruction of site vegetation and faunal species</p>	EHS Officer	<p>Barricading tape (to indicate working areas)</p> <p>Complaint logbook</p>	Throughout the exploration phase

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Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Party	Resources	Timeline
		<p>-Make use of the existing road network as much as possible and avoid off-road driving to reduce the risk of habitat destruction and small faunal species in burrows.</p> <p>-Vegetation found on the site, but not in the targeted exploration areas should not be removed but left to preserve biodiversity on the site.</p> <p>-Breeding sites for faunal species that are found within the site and nearby should not be disturbed.</p> <p>-Environmental awareness on the importance of biodiversity preservation should be provided to the workers and contractors.</p> <p>Flora:</p> <p>-The Proponent should avoid unnecessary removal of vegetation, thus promoting a balance between biodiversity and their operations.</p> <p>-Vegetation found on the site, but not in the targeted exploration areas should not be removed but left to preserve biodiversity on the site.</p> <p>-Movement of vehicle and machinery should be restricted to existing roads</p>	<p>Visible preservation of onsite vegetation</p>			

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Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Party	Resources	Timeline
		<p>and tracks to prevent unnecessary damage to the vegetation.</p> <p>-Even if a certain vegetation is found along the exploration sites, this does not mean that it should be removed. Therefore, care should be taken during exploration without destroying the site vegetation.</p> <p>-Design access roads appropriately in a manner that disturbs minimal land areas as possible.</p> <p>-Make use of the existing road network as much as possible and avoid off-road driving, to minimize onsite floral destruction.</p> <p>-Vegetation clearing to be kept to a minimum. The vegetation of the site is largely low and open and therefore whole-sale vegetation clearing should only be applied where necessary and within the development footprint.</p> <p>-Vegetation found on the site, but not in the targeted areas should not be removed but left to preserve biodiversity on the site.</p> <p>-No-go areas should be identified prior to operation to prevent disturbances in the current preserved ecosystems</p>				

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Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Party	Resources	Timeline
		-Environmental awareness on the importance of floral biodiversity preservation should be provided to the workers and contractors.				
Illegal hunting	Illegal hunting of wildlife	-No wildlife hunting is permitted. -Site personnel should refrain from killing/poaching or intentionally disturbing wildlife, or any faunal species found on site and around the EPL site.	Incident reports of illegal hunting of wildlife by the exploration crew.	EHS Officer	Complaint's logbook Anti-poaching Police Unit	During site set up, and throughout exploration phase
Land Use	Conflict between neighbouring land uses and exploration activities	-Exploration activities should not in any way hinder the existing land uses within the EPL but rather promote co-existence throughout the operations while respecting other land uses. -The project workers and vehicles should be limited to the actual EPL active sites only but not unnecessarily wander and drive around other land uses sites, respectively. -The Proponent should ensure that their activities comply with the conditions set by the competent, regulatory, and affected authorities such that the proposed exploration activities do not severely impact the different existing activities around the EPL.	Land access and use permits/authorizations. Compliance with conditions set within operational permits by relevant and affected authorities. Little to no complaints of significant interference from the neighbouring land users	PRO Proponent EHS Officer/ECO	Proponent Relevant authorities (MEFT, MME, etc.)	Throughout the exploration phase

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Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Party	Resources	Timeline
Landscape Aesthetics	Impact on Tourism and Visual	<p>-The Proponent should consider the implementation of continuous rehabilitation programme, by using topsoil and overburden waste rocks and restoring and vegetation harmed through the process, to visually maintain the landscape's natural setting.</p> <p>-Avoid creation of unnecessary access routes, which may lead to landscape scarring on site, but utilize existing tracks as far as possible to minimize the creation of unnecessary and long-term tracks on the site.</p> <p>-Progressive working and restoration/rehabilitation should be carried out over the shortest timescale possible, to avoid excessive areas of disturbance on site.</p> <p>-Consider setting up drill rigs and associated facilities further from the roads' parts of the EPL to reduce the sight from road users.</p> <p>-In the case that two or more confirmed targets for detailed exploration activities are close to the roads, consider working as fast as possible on sites that are closest to the roads to ensure that the</p>	<p>No further major contribution to the visual impact in the area.</p> <p>No complaints from the locals regarding major eyesore due to unmanaged site restoration/rehabilitation</p> <p>Visible progressive backfilling done to reduce landscape contrast.</p>	<p>Proponent</p> <p>Site/Project Manager</p>	Complaint's logbook	Throughout the exploration phase

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Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Party	Resources	Timeline
		<p>presence of trucks, drill rigs and associated structures is shortened.</p> <p>-Avoid using vehicles, equipment, machinery and even ablution facilities with various contrasting colours so that they do not cause a significant contrast on site.</p>				
Road use and safety	Increase in vehicular traffic flow	<p>-Vehicles should be driven only on existing access roads and necessary temporary access roads only leading to EPL mapped sites; no new roads should be constructed.</p> <p>-The transportation of project materials, equipment and machinery should be limited to once or twice a week only, and not daily.</p> <p>-The heavy truck loads should comply with the maximum allowed limit while transporting materials and equipment/machinery on the public and access roads.</p> <p>-Water carted into the project area from outside the area should be transported in once or twice a week in containers that can supply and store water for most of the week, to reduce truck activity on the road.</p> <p>.</p>	<p>No complaints from members of the public regarding vehicular traffic issues related to the project activities.</p> <p>All personnel operating the project vehicles and machinery are appropriately licensed and possession of valid driving licenses.</p> <p>Demarcated areas for parking, offloading, and loading zones are on sites.</p> <p>If required, site access road permits obtained, and requirements fulfilled.</p>	<p>Proponent</p> <p>EHS Officer/ECO</p>	None	<p>Throughout exploration phase</p> <p>Site access permit (s) to be applied for and obtained prior to commencement of exploration works</p>

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Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Party	Resources	Timeline
		<p>-Drivers of all project phases' vehicles should be in possession of valid and appropriate driving licenses.</p> <p>Vehicle drivers should adhere to the road safety rules.</p> <p>-Drivers should drive slowly (40km/hour or less), and on the lookout for wildlife and people.</p> <p>-Project vehicles should be in a road worthy condition and serviced regularly to avoid accidents because of mechanical faults of vehicles.</p> <p>-Vehicle drivers should only make use of designated site access roads provided.</p> <p>-Vehicle drivers should not be allowed to operate vehicles while under the influence of alcohol.</p> <p>-The Proponent should make provision for safe materials and equipment offloading and loading areas on sites.</p> <p>-No heavy trucks or project related vehicles should be parked outside the project site boundary or demarcated areas for such purpose.</p> <p>-Truck movements, frequency, times, and routes should be carefully planned</p>	<p>No creation of unnecessary tracks on site.</p>			

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Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Party	Resources	Timeline
		<p>and scheduled – please refer to the next point.</p> <p>-To control traffic movement on site, deliveries from and to site should be carefully scheduled. This should optimally be during weekdays and between the hours of 8am and 5pm.</p>				
Health and safety	General health and safety associated with project activities in both phases	<p>-As part of their induction, the project workers should be provided with an awareness training of the risks of mishandling equipment and materials on site as well as health and safety risk associated with their respective jobs.</p> <p>-When working on site, employees should be properly equipped with adequate personal protective equipment (PPE) such as coveralls, gloves, safety boots, earplugs, dust masks, safety glasses, and hard hat.</p> <p>-Heavy vehicle, equipment and fuel storage site should be properly secured, and appropriate warning signage placed where visible.</p> <p>-No employee should be allowed to consume alcohol or other intoxicants or allowed onsite prior to and during working hours as this may lead to mishandling of equipment which results</p>	Comprehensive health and safety plan for all exploration activities compiled.	<p>Proponent</p> <p>Site/Project Manager</p> <p>EHS Officer/ECO</p>	Occupational Health and Safety Personnel Health and Safety Trainings	Throughout the project phase and trainings offered as and when required

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Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Party	Resources	Timeline
		<p>into injuries and other health and safety risks.</p> <p>-Ensure that after completion of exploration holes, drill cuttings are put back into the hole and the holes filled and levelled.</p> <p>-An emergency preparedness plan should be compiled, and all personnel appropriately trained.</p> <p>-The site to be equipped with „”danger” or “cautionary” signs for any potential danger or risk area identified on site.</p> <p>-Open sampling trenches that pose a risk to the local people and animals and still in use during exploration should be fenced off until such as time that they can be backfilled, and the areas rehabilitated.</p> <p>-All employees and contractors (personnel) to be trained on environmental awareness, the Proponent’s internal Environmental Health and Safety Policy, Environmental Management Plan, and engagement with key stakeholders, specifically the key government ministries and farmers.</p>				
	Potential increase of	-The workers should be engaged in health talks and training about the	No new infections recorded linked to mine workers	Proponent	Occupational health and safety personnel	Throughout exploration phase

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Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Party	Resources	Timeline
	prevalence of HIV and AIDS, as well as other sexually transmitted diseases (STDs) prevalence	dangers of engaging in unprotected sexual relations which results in contracting HIV/AIDS and other sexual related infections. -Provision of condoms and sex education through distribution of pamphlets and health trainings. These pamphlets can be obtained from local health facilities.		EHS Officer/ECO	Sex and Health Education/Awareness Provision of condoms at the accommodation facilities	
	Accidental fire outbreak	-Portable fire extinguishers should be provided on site. -No open fires to be created by operational personnel. -Potential flammable areas and structures such as fuel storage tanks should be marked as such with clearly visible signage.	No wildfires recorded (due to presence of workers)	Proponent EHS Officer	Fire extinguishers (1 per vehicle) and 1 per working site	Throughout exploration phase
Archaeology and heritage	Accidental disturbance and destruction of	-Contractors working on the site should be made aware of the possibility of archaeological/heritage resource	Preservation of all artefacts and objects that are	Proponent EHS Officer	Salvage equipment	As and when required, i.e., prior

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Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Party	Resources	Timeline
	<p>archaeological or heritage objects and sites</p>	<p>discoveries during works, and the procedures to follow in the event of an archaeological find.</p> <p>-The Proponent should consider having a qualified and experienced archaeologist on standby/call during the entire operational phase, to assist on the possible of uncovering of discoveries/resources and advice the Proponent accordingly</p> <p>-During the mineral exploration phase, it is important to take note and recognize any significant material being unearthed and making the correct judgment on which actions should be taken (refer to the attached Chance Finds Procedure (CFP) - Appendix 1).</p> <p>-The footprint impact of the proposed prospecting and exploration activities should be kept to minimal to limit the possibility of encountering chance finds within servitude. The Proponent should keep a buffer of 50 meters on all the sites observed within the project area.</p> <p>-A landscape approach of the site management must consider culture and heritage features in the overall planning of exploration infrastructures within and beyond the license boundaries.</p>	<p>discovered on and around project site</p>	<p>Operator</p> <p>Foreman</p> <p>Superintended</p> <p>Archaeologist</p>	<p>Flag tapes</p> <p>GPS (site marking)</p>	<p>to site set up, and during operations.</p>

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Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Party	Resources	Timeline
		<p>-The Proponent is advised to make an application to the National Heritage Council for a Consent to allow detailed assessment of the area in relation to activity or development believed to be an archaeological site/s.</p> <p>-Pre-identified sites of heritage/archaeological significance should be regarded as no go zones for exploration activity within the EPL area.</p> <p>-Graves or any archaeological significant objects discovered on the site during operation should not be disturbed but are to be reported to the project Environmental officer or National Heritage Council offices.</p> <p>-Detailed field survey should be carried out if suspected archaeological resources or major natural cavities / shelters have been unearthed during the operations.</p>				
Littering and waste management (general waste and sanitation)	Environmental Pollution	<p>-Biodegradable and non-biodegradable wastes must be stored in separate containers and collected regularly for disposal at a certified landfill/dump site.</p> <p>-Any hazardous waste that may have an impact on the animals, vegetation or the environment should be handled cautiously and disposed of in</p>	<p>No visible litter around the project area</p> <p>Provision of sufficient waste storage containers</p> <p>Waste management awareness</p>	EHS Officer/ECO	Waste storage containers	Throughout exploration phase

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Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Party	Resources	Timeline
		<p>accordance with hazardous waste management guidelines.</p> <p>-No refuelling of vehicles on site. Refuelling should only be done at a designated refuelling facility.</p> <p>-Workers should be sensitized to dispose of waste in a responsible manner.</p> <p>-After each daily works, the Proponent should ensure that there are no wastes left on the sites.</p> <p>-All domestic and general operational waste produced daily should be contained until such that time it will be transported to designated waste sites.</p> <p>-No waste may be buried or burned on site or anywhere else.</p> <p>-The EPL site should be equipped with separate waste bins for hazardous and general waste/domestic.</p> <p>-Sewage waste should be stored as per the portable chemical toilets supplied on site and regularly disposed of at the nearest treatment facility.</p> <p>-Accidental oil spills should be taken care of by removing and treating soils affected by the spill.</p>				

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Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Party	Resources	Timeline
		<p>-A penalty system for irresponsible disposal of waste on site and anywhere in the area should be implemented.</p> <p>-Careful storage and handling of hydrocarbons on site is essential.</p> <p>-Potential contaminants such as hydrocarbons and wastewater should be contained on site and disposed of in accordance with municipal wastewater discharge standards so that they do not contaminate surrounding soils and eventually groundwater.</p> <p>-An emergency plan should be available for major/minor spills at the site during operation activities (with consideration of air, groundwater, soil, and surface water) and during the transportation of the products(s) to the site.</p> <p>-After each daily works, there should not be waste left scattered on site, but rather be disposed of in allocated site waste containers.</p> <p>-No waste may be buried or burned on site or anywhere else throughout the project lifecycle.</p> <p>-All domestic and general waste produced daily should be contained until such that time it will be transported</p>				

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Party	Resources	Timeline
		<p>to designated waste sites on a weekly basis.</p> <p>-The sites should be equipped with separate waste bins for hazardous and general waste/domestic.</p> <p>-Hazardous waste, including emptied chemical containers should be safely stored on site until such time that they are transported to the nearby approved hazardous waste sites for safe disposal.</p> <p>-A penalty system for irresponsible disposal of waste on site and anywhere in the area should be implemented</p>				
	Wastewater generated by exploration workers living on-site.	<p>-Provision of toilet facilities for workers (mobile/portable chemical toilet).</p> <p>-Emptying of chemical toilets according to the manufacturer's specifications. Treating latrine waste to render non-polluting.</p>	Adequate toilet and basic ablution facilities on site.	Proponent EHS Officer/ECO	<p>Chemical toilets</p> <p>Sewage removal operator</p> <p>waste treatment agents/chemicals</p>	Throughout exploration phase
Air Quality	Dust generation	-The Proponent should ensure that the operational schedule is limited to the given number of days of the week, and not every day. This will keep the	No complaints from the public about vehicle emissions and dust generation.	EHS Officer/ECO	<p>Complaint's logbook</p> <p>Dust suppressant (Water)</p>	Throughout exploration phase

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Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Party	Resources	Timeline
		<p>vehicle-related dust level minimal in the area.</p> <p>-Given the limited vegetation cover, soils are exposed, it is highly probable that more dust will be generated from exploration activities (excavating). It is, therefore, advised that during extremely windy days, a reasonable amount of water should be used to suppress the dust that may be emanating from certain exploration activities.</p> <p>-Exploration vehicles should not drive at a speed more than 40 km/h to avoid dust generation around and within the site area.</p> <p>--Exploration schedule should be limited to the given number of days of the week, and not every day. This will keep the vehicle-related dust level minimal in the area.</p> <p>-Dust control measures such as reasonable amount of water spray should be used on access roads emitting a lot of dust and near EPL site to suppress the dust that may be emanating from certain exploration areas on the EPL.</p> <p>-Dust masks, eye protective glasses and other respiratory personal protective equipment (PPE) such as</p>	<p>Visible efforts to curb dust</p>			

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Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Party	Resources	Timeline
		<p>face masks should be provided to the workers on site drilling areas, where they are exposed to dust.</p> <p>-Excavating equipment should be regularly maintained to ensure drilling and excavation efficiency and so to reduce dust generation and harmful gaseous emissions.</p>				
Noise	Nuisance	<p>-The transportation of exploration materials, equipment and machinery should be limited to once or twice a week only, but not every day.</p> <p>-Noise from project vehicles and equipment operations' vehicles and equipment on the working sites of the EPL should be at acceptable levels.</p> <p>-The operational times should be set such that, no such activities are carried out during the night or very early in the mornings (to be limited between 8am and 5pm on weekdays).</p> <p>-Operational hours should be restricted to between 06h00 and 18h00 to avoid noise and vibrations generated by exploration equipment and the movement of vehicles before or after hours.</p> <p>-When operating the excavation and drilling machinery or close to noise-</p>	Complaints from neighbouring land users about excessive noise.	EHS Officer/ECO	Complaint's logbook	Throughout exploration phase

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Party	Resources	Timeline
		<p>producing equipment and machinery onsite, workers should be equipped with personal protective equipment (PPE) such as earplugs to reduce noise exposure. These PPE should be regularly checked/tested for effectiveness and on detected malfunction, the PPE should be replaced as soon as possible.</p> <p>-When operating the drilling machinery onsite, workers should be equipped with personal protective equipment (PPE) such as earplugs to reduce exposure to noise</p>				
PROGRESSIVE REHABILITATION AND DECOMMISSIONING PHASE						
Rehabilitation	Disturbance and damaging of land	<p>-All drilled boreholes and excavated pits related to the project activities should be capped and backfilled, respectively.</p> <p>-All waste generated and stored on site during exploration activities should be disposed of at the respective nearest solid waste management sites.</p> <p>-The stockpiled topsoil should be levelled soon after completion of works at sites.</p> <p>-Any temporary setup on site should be dismantled, and the area rehabilitated</p>	<p>Capped boreholes and backfilled pits</p> <p>No sign of waste or littering seen on site and around site areas.</p> <p>Carrying away of waste, and removal of vehicles and equipment from site</p> <p>No stockpiled topsoil (topsoil is levelled after completion of each work)</p>	Proponent	<p>Excavators and other backfilling/demolishing machinery</p> <p>Record of pits excavated, and boreholes drilled (if any)</p> <p>Waste containers on sites</p> <p>Photo records of backfilled sites</p>	<p>Progressive rehabilitation done throughout the exploration phase and complete decommission and rehabilitation done after completion of exploration works.</p>

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Party	Resources	Timeline
		as far as practicable, to their original state. -Explored areas on worksites should be progressively rehabilitated by stockpiling and backfilling. -Provision of both financial and technical resources for progressive rehabilitation.	Campsite dismantled and materials taken away from site. Visible signs of stockpiled topsoil		Records of finances set aside for decommissioning activities	

3.4 Monitoring Phase Management Action Plans (Monitoring Plan)

To support and ensure that the proposed mitigation measures are achieving the desired results, a monitoring plan must be implemented. The monitoring action plans recommended for planned exploration works are presented in **Table 4** below.

Table 4: Management action plans for the Monitoring Phase

Environmental Feature	Impact	Monitoring Actions	Responsible person(s) / Implementation responsibility	Frequent	Threshold	Action if threshold is exceeded
Soils	Loss of topsoil	All measures should be considered to prevent the loss of topsoil	EHS Officer/ECO and Site Manager	weekly	Proliferation of new vehicle tracks	Rehabilitation of affected areas

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Environmental Feature	Impact	Monitoring Actions	Responsible person(s) / Implementation responsibility	Frequent	Threshold	Action if threshold is exceeded
Monitoring	EMP non-compliance	The ECO or the Proponent/Contractor should monitor the implementation of this EMP to ensure compliance. The ECO(s) should inspect the site throughout the exploration period and after completion.	EHS Officer/ECO	Daily	Increase in health, safety and environmental damage incidence	Daily safety talks, Remedy the consequences
Biodiversity	Loss of biodiversity	Comply to marked no-go areas and avoid areas sensitive to any type of disturbance. Clear only footprint areas to maintain as much of the remaining natural vegetation on site and to prevent loss of habitat (if so, advised by MEFT).	EHS Officer/ECO Workers involved in this phase	Weekly	Vegetation clearance outside of marked areas.	Rehabilitation of affected areas to the satisfaction of the EHS Officer
Health and Safety	Health and safety of the workers	-Workers should be trained on how to handle materials and equipment on site (if they do not already know how to) to avoid injuries. Exploration equipment and materials transported to site should be securely fastened to the vehicles (trucks and cars). This is to ensure that the materials and equipment do not fall off	EHS Officer/ECO Worker Involved in this phase	Daily/Weekly	Health and safety incident	Remedy the consequences

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Environmental Feature	Impact	Monitoring Actions	Responsible person(s) / Implementation responsibility	Frequent	Threshold	Action if threshold is exceeded
		<p>the vehicles and cause injuries to anyone while transporting them.</p> <p>- All personnel should be provided with appropriate personal protective equipment (PPE), such as gloves, masks, safety boots, safety glasses and hard hats always during exploration hours on site to prevent serious injuries or loss of life.</p> <p>-No employee should be allowed to drink alcohol prior to and during working hours as this may lead to mishandling of equipment which results into injuries and other health and safety risks.</p>				
Neighbouring land users to the site	Disturbance	Exploration works schedule should be limited to normal working hours, between 06h00 and 18h00. This is to ensure generated noise does not become nuisance to the neighbours.	EHS Officer/ECO Site Manager	Weekly	A logged complaint about excessive noise	Revision of site activities
Waste	Environmental Pollution	-The site should be always kept tidy. All domestic and general construction waste produced daily should be	EHS Officer/ECO	Daily	Visible litter around project site	Clean-up of the affected areas and ensuring exploration

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Environmental Feature	Impact	Monitoring Actions	Responsible person(s) / Implementation responsibility	Frequent	Threshold	Action if threshold is exceeded
		<p>cleaned and contained daily to prevent environmental pollution.</p> <p>-Separate waste containers (bins) for hazardous and domestic / general waste must be provided on site to avoid mixing of waste.</p>	All workers involved in this phase.		A logged complaint	workers utilise waste containers provided.
Transport	Transportation of workers to and from site	<p>-Project workers will be transported, in an SUV, bus (or similar suitable passenger vehicle) to and from site to ensure workers safety.</p> <p>-No off-road driving</p>	EHS Officer/ECO	Daily	A logged complaint about bad form of transport affecting occupational safety and health of workers	
Vehicular traffic safety	Increase in local traffic flow.	<p>-All drivers of the project vehicles should be in possession of valid and appropriate driving licenses to operate such vehicles.</p> <p>-Project vehicles should be in a road worthy condition and serviced regularly to avoid accidents because of mechanical faults of vehicles.</p> <p>-Vehicle drivers should not be allowed to operate vehicles while under the influence of alcohol.</p>	EHS Officer/ECO	Weekly	A logged complaint about traffic increase or damage to roads	Find alternative access roads for the team. Rehabilitation of affected roads

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Environmental Feature	Impact	Monitoring Actions	Responsible person(s) / Implementation responsibility	Frequent	Threshold	Action if threshold is exceeded
		-No heavy trucks or project related vehicles should be parked on biologically sensitive areas.				

2.5 Decommissioning and Rehabilitation Phase

Successful rehabilitation requires careful consideration of the local ecological context in combination with rehabilitation goals. The most important steps in undertaking a successful rehabilitation are planning and environmental awareness (environmental education) on the importance of progressive rehabilitation (or post-activity rehabilitation) and its importance to the environment. Furthermore, to successfully implement the planned rehabilitation, practically, this will depend on a few factors, namely the rehabilitation program, characteristics of the site, nature of disturbance, rehabilitation methods, as well as resources availability.

Rehabilitation of the EPL site may include the re-vegetation of areas with species consistent with surrounding vegetation; refilling of trenches in such a way that subsoil is replaced first and topsoil replaces last.

Any excavated pits should not only be filled with sand alone, as wind will scour the sand and re-establish the holes. Necessary landscaping of exploration areas will be undertaken upon completion of each stage of operational.

Site Specific Rehabilitation Plan

To ensure that they do their best to rehabilitate the disturbed areas, the Proponent intends to:

- Utilize stockpiled subsoil and topsoil to back fill the excavated pits/trenches.
- Make financial provision that will be used for post-operational rehabilitation program.
- Backfilling of all pits and trenches with loose materials.
- Levelling of topsoil that was stockpiled for mining purposes.
- Removal of project vehicles and equipment from the site and taken to designated parking facility off site.
- All project support structures such as ablution facility (toilet and washroom system), and storage containers/tanks shall be demolished, and the waste taken to designated sites. The site areas on which these structures were set up will be rehabilitated to pre-operational state.

- All accumulated waste (hazardous, solid, and general) up until the cessation of exploration activities will be removed site and transported to designated off site waste management facilities.

Decommissioning and rehabilitation will involve the following:

- Necessary landscaping will be undertaken upon completion of each phase of operation
- Capping or backfilling of all excavated pits with loose materials.
- Collecting and disposing domestic waste at the nearest landfill/ dumpsite.
- Leveling the stockpiled topsoil during exploration phase.
- Any temporary setup of camps should be dismantled, and the area should be rehabilitated as far as possible to its original state

4 ENVIRONMENTAL MONITORING AND REPORTING

To minimize the "medium" and uphold the "low" significance ratings of impacts identified and assessed in the ESA report. Monitoring reports are to be compiled and submitted to the DEAF for archiving on a bi-annual basis (every 6 months throughout the project operations) or as required by the Environmental Commissioner (as per the ECC conditions). This practice will make any considerations for ECC renewal easy when it is about to expire. Therefore, the Proponent should meritoriously monitor and submit the reports to the DEAF. The submission is not only done for record keeping purposes, but also in compliance with the environmental legislation.

5 CONCLUSIONS AND RECOMMENDATIONS

Potential positive and negative impacts stemming from the exploration activities were acknowledged, assessed and mitigation measures made thereof. The mitigation measures indorsed in the ESA report and management action plans provided in the draft Environmental Management Plan can be considered adequate to elude and/or reduce the risks to acceptable levels. Therefore, Excel Dynamic Solutions (Pty) Ltd assures that these measures are sufficient to enable environmentally sustainable and safe exploration works on the EPL. It is recommended that a written approval for the ECC may be issued on condition that the provided management measures and action plans are effectively implemented on site and monitored.

APPENDIX 1: CHANCE FINDS PROCEDURE (after KINAHAN, 2020)

Areas of proposed development activity are subject to heritage survey and assessment at the planning stage. These surveys are based on surface indications alone, and it is therefore possible that sites or items of heritage significance will be found during development work. The procedure set out here covers the reporting and management of such finds.

Scope: The “*chance finds*” procedure covers the actions to be taken from the discovery of a heritage site or item to its investigation and assessment by a trained archaeologist or other appropriately qualified person.

Compliance: The “chance finds” procedure is intended to ensure compliance with relevant provisions of the National Heritage Act (27 of 2004), especially Section 55 (4): “*a person who discovers any archaeological objectmust as soon as practicable report the discovery to the Council*”. The procedure of reporting set out below must be observed so that heritage remains reported to the NHC are correctly identified in the field.

Manager/Supervisor must report the finding to the following competent authorities:

- National Heritage Council of Namibia (061 244 375)
- National Museum (061 276800),
- National Forensic Laboratory (061 240461).

Archaeological material must NOT be touched. Tempering with the materials is an offence under the heritage act and punishable upon conviction by the law.

Responsibility:

- Operator:** To exercise due caution if archaeological remains are found
- Foreman:** To secure site and advise management timeously
- Superintendent:** To determine safe working boundary and request inspection
- Archaeologist:** To inspect, identify, advise management, and recover remains

Procedure:

Action by person identifying archaeological or heritage material:

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Damaran Exploration Namibia (Pty) Ltd

EMP: EPL No. 7327

- a) If operating machinery or equipment stop work
- b) Identify the site with flag tape
- c) Determine GPS position if possible
- d) Report findings to foreman

Action by foreman

- a) Report findings, site location and actions taken to superintendent
- b) Cease any works in immediate vicinity

Action by superintendent

- a) Visit site and determine whether work can proceed without damage to findings
- b) Determine and mark exclusion boundary
- c) Site location and details to be added to project GIS for field confirmation by archaeologist

Action by Archaeologist

- a) Inspect site and confirm addition to project GIS
- b) Advise NHC and request written permission to remove findings from work area
- c) Recovery, packaging and labelling of findings for transfer to National Museum

In the event of discovering human remains

- a) Actions as above
- b) Field inspection by archaeologist to confirm that remains are human
- c) Advise and liaise with NHC and Police
- d) Recovery of remains and removal to National Museum or National Forensic Laboratory, as directed.