

Updated Environmental Management Plan (EMP):

THE PROPOSED EXPLORATION ON THE EXCLUSIVE PROSPECTING LICENSE (EPL) No. 7352 LOCATED NORTHWEST OF DORDABIS IN THE KHOMAS REGION

Document Version: **DRAFT**

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1 INTRODUCTION

1.1 Project Background

Lodestone Namibia (Pty) Ltd (The Proponent) was granted the Exclusive Prospecting License (EPL) No. 7352 by the Ministry of Mines and Energy (MME). The EPL ownership is valid between 25 April, 2019 and 24 April 2022. The 7116.8473-ha EPL is located about 20 km northwest of Dordabis Settlement. The locality of the EPL site is shown in **Figure 1**. The EPL covers parts of Farms Elisenhohe 88, Tsatsachas 87, Alt Stolzenfeld 442, and Coas 457, as indicated in **Figure 2**. The EPL is prospective to Base and Rare Metals and Precious Metals.

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

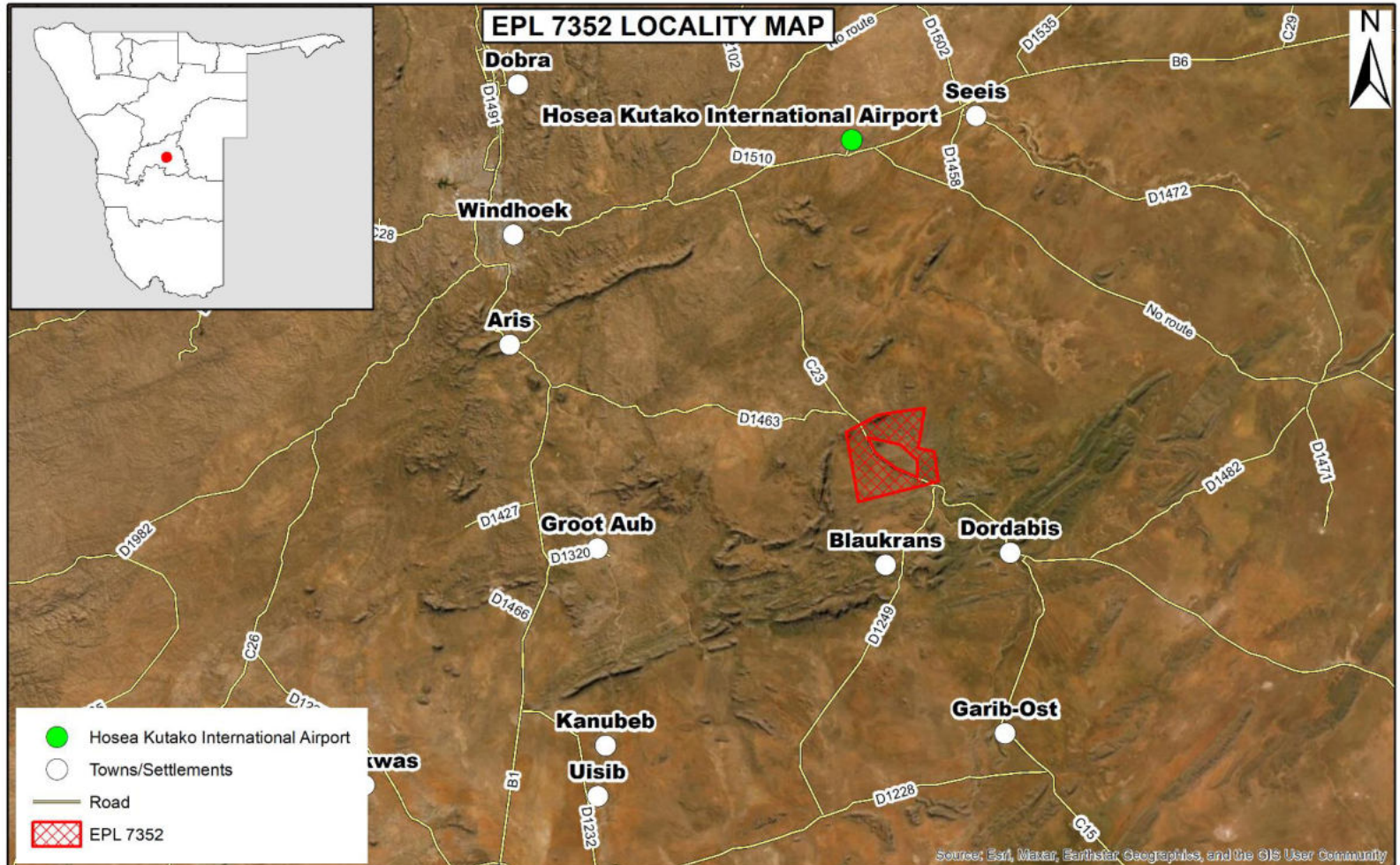
3.1 The construction of facilities for any process or activities which requires a license, right of other forms of authorization, and the renewal of a license, right or other form of authorization, in terms of the Minerals (Prospecting and Mining Act, 1992).

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.

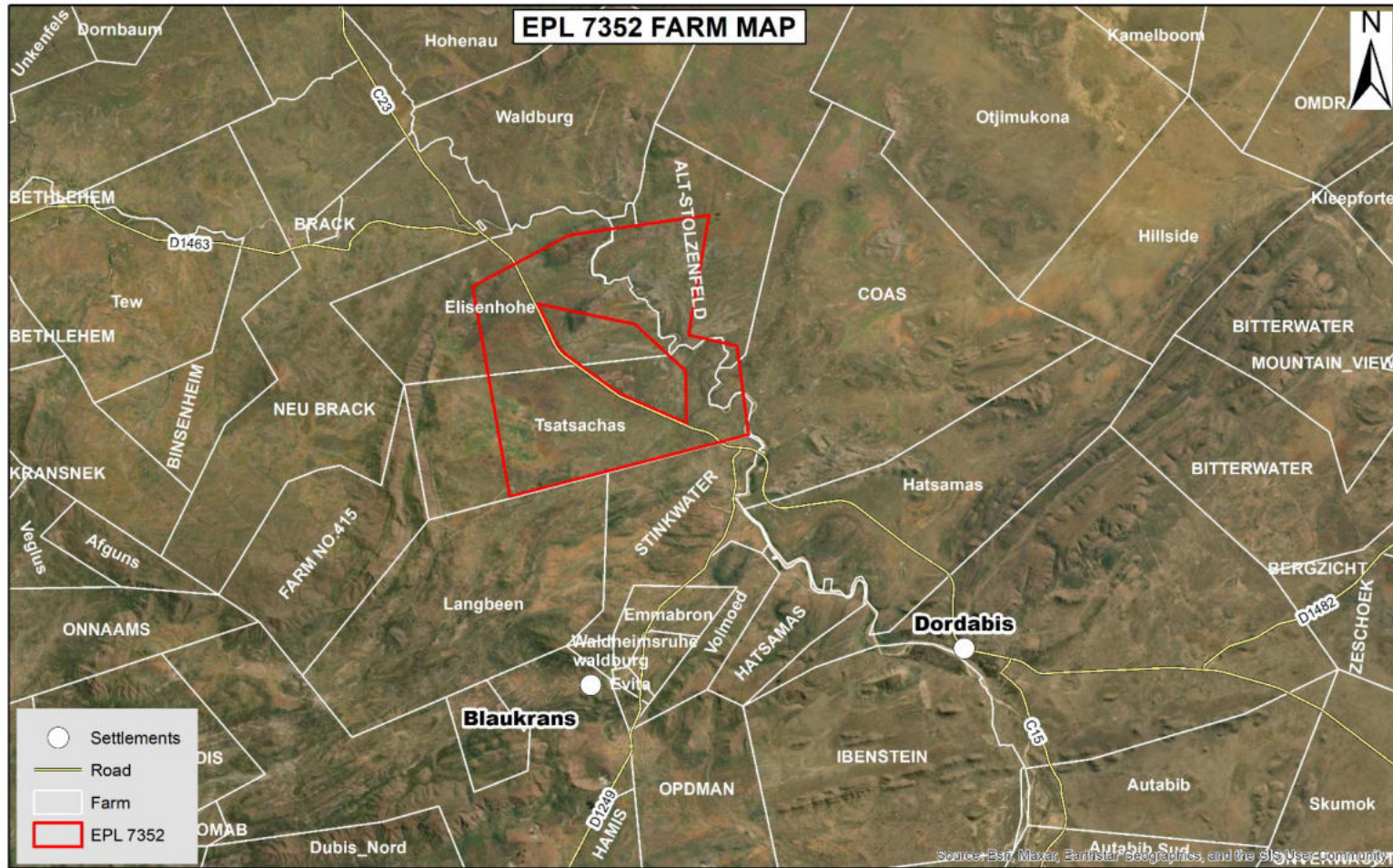
This document has been prepared as a legal requirement by Section 8 of the EMA, No. 7 of 2007 and its 2012 EIA regulations. The compilation of this EMP is also one of the outputs required of the Environmental Consultant (Environmental Assessment Practitioner (EAP), by The Proponent. It is required of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

- Prepare a detailed Environmental Management Plan that can be used as guide to monitor compliance to the recommendations made in the EIA and to assist in managing and monitoring activities throughout the operation and maintenance of the proposed exploration and prospecting activities on the EPL.
- The Environmental Consultant must clarify in the EMP, the roles and responsibilities of the Proponent, the contractors and any other identified stakeholders



	Cartographer: SL Johannes Date: October 2022	Lodestone Namibia (Pty) Ltd Region: Khomas commodities: BRM, PM 17.484784, -22.842608	Coordinate System: GCS WGS 1984 Datum: WGS 1984 Units: Degree	
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Figure 1: EPL 7352 Locality Map





 <p>Excel Dynamic Solutions PTY LTD</p>	<p>Cartographer: SL Johannes Date: October 2022</p>	<p>Lodestone Namibia (Pty) Ltd Region: Khomas Commodities: BRM, PM 17.484784, -22.842608</p>	<p>Coordinate System: GCS WGS 1984 Datum: WGS 1984 Units: Degree</p>	
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Figure 2: EPL 7352 Farms Map

1.2 Appointed Environmental Consultant

To ensure that the proposed activity is compliant with the national environmental legislation, the project Proponent appointed an independent environmental consultant, Excel Dynamic Solutions (Pty) Ltd, to compile an updated EMP, to guide operations of prospecting and exploration activity on EPL 7352.

1.3 The Aim of the Environmental Management Plan (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 EA, as it synthesizes all the proposed mitigation and monitoring actions, set to a timeline and with specific assigned responsibilities. It provides a link between the impacts identified in the EA process and the required mitigation measures to be implemented 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 - the operation and maintenance phase, and the decommissioning and rehabilitation phase:

- **Operation and Maintenance** - This is the phase where The Proponent carries out exploration and prospecting activity for the target resource on site.
- **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 a decline in commodity market price. Before the decommissioning phase, The Proponent will needs to have site rehabilitation measures in place.

Environmental Monitoring Requirements: In order 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 EMP will be used by The Proponent, employees and/or contractors to provide management measures to be undertaken during the exploration and prospecting 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.

2 LEGAL OBLIGATIONS GOVERNING THE PROPOSED ACTIVITIES

Upon issuance of the ECC and obtaining any other necessary and required documentation, the Proponent will prepare for the administrative and technical aspects needed for the actual prospecting and exploration works on the EPL.

The prospecting and exploration and associated activities ought to adhere to certain local, regional, national as well as international legal framework. The legal requirements provided herein are those regarding permits or licensing required of the Proponent and/or renewal of permits throughout the exploration phase. These legal requirements are provided under **Table 1**.

Table 1: Applicable and required permits/authorizations/licenses for the proposed prospecting and exploration activities

Legislation/Policy/Guideline	Relevant Provision	Implication for the Project and Contact Institution/Person
Environmental Management Act (EMA) No. 7 of 2007	<p>The Act requires that projects with significant environmental impacts are subject to an environmental assessment process (Section 27).</p> <p>The Act details principles which are to guide all EAs.</p>	<p>The EMA and its regulations should inform and guide this ESA process.</p> <p>Should the ECC be issued to the Proponent, it should be renewed every 3 years, counting from the date of issue.</p>
Environmental Impact Assessment (EIA) Regulations Government Notice 28-30 (Government Gazette 4878))	<p>Details requirements for public consultation within a given environmental assessment process (Government Notice 30 Section 21).</p> <p>Details the requirements of a Scoping Report (Government Notice 30 Section 8) and an Assessment Report (Government Notice 30 Section 15).</p>	<p>Contact details at the Department of Environmental Affairs and Forestry (DEAF), Ministry of Environment, Forestry and Tourism (MEFT)</p> <p>Office of the Environmental Commissioner</p> <p>Tel: +264 (0) 61 284 2701</p>
Minerals (Prospecting and Mining) Act (No. 33 of 1992)	<p>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.</p> <p>Section 54(2): details provisions pertaining to the decommissioning or abandonment of a mine.</p>	<p>The Proponent should ensure that all necessary permits/authorization for these EPL are obtained from the Ministry of Mines and Energy (MME).</p> <p>Contact details at the Ministry of Mines and Energy:</p> <p>Mining Commissioner's Office</p> <p>Tel: +264 61 284 8167</p>

Legislation/Policy/Guideline	Relevant Provision	Implication for the Project and Contact Institution/Person
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. Contact details at the Ministry of Mines and Energy: Petroleum Affairs Tel: +264 61 284 8291
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.	The protection of employees and contractors' labour rights and occupational health safety
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, known to occur within the project boundaries, and require to be removed, a Permit should be obtained from the nearest Forestry Office (MEFT) prior to removing them. Contact Details at MEFT (Forestry Division Head Office), Directorate of Forestry: Tel: +264 (0) 61 208 7320

Legislation/Policy/Guideline	Relevant Provision	Implication for the Project and Contact Institution/Person
		<p>Email address: Johnson.ndokosho@gmail.com</p>
<p>National Heritage Act (Act No. 27 of 2004)</p>	<p>The Act makes provision for the protection and conservation of places and objects of heritage significance and the registration of such places and objects. Part V Section 46 of the Act prohibits removal, damage, alteration, or excavation of heritage sites or remains, while Section 48 sets out the procedure for application and granting of permits such as might be required in the event of damage to a protected site occurring as an inevitable result of development. Part VI Section 55 Paragraphs 3 and 4 require that any person who discovers an archaeological site should notify the National Heritage Council. Section 51 (3) sets out the requirements for impact assessment.</p> <p>Should any objects of heritage significance be identified during the site clearing and excavations, the work must cease immediately in the affected sites and the necessary steps taken to seek authorisation from the Council.</p>	<p>The Proponent is advised to make an application to the National Heritage Council for a Consent to allow Detailed Archaeological and Heritage Assessment Study of the EPL area.</p> <p>Contact details of the National Heritage Council of Namibia</p> <p>Tel: +264 (0) 61 301 903</p>
<p>The National Monuments Act No. 28 of 1969</p>	<p>The Act enables the proclamation of national monuments and protects archaeological sites.</p>	
<p>The Road Traffic and Transport Act No. 52 of 1999 and its 2001 Regulations</p>	<p>Provides for the control of traffic on public road and the regulations pertaining to road transport, including the licensing of vehicles and drivers.</p>	<p>Mr Eugene de Paauw (Roads Authority- specialist Road legislation), Tel: +264 (0) 61 284 7072</p>

3 DRAFT EMP IMPLEMENTATION, ROLES & RESPONSIBILITIES

As the project Proponent, Lodestone Namibia (Pty) Ltd is ultimately responsible for the implementation of the EMP. However, they may delegate this responsibility at any time, as they deem necessary during the project phases (usually an environmental control officer or safety, health, and environmental person). The roles and responsibilities of all the parties involved in the effective implementation of this EMP are as follows:

3.1 Competent Environmental Monitoring Authorities (DEAF and Others)

The Department of Environmental Affairs and Forestry (DEAF) is responsible for enforcing compliance with the EMA, its regulations and full implementation of this EMP. The DEAF is also responsible for the reviewing of bi-annual reports submitted by the Proponent and grant ECC renewal after every 3 years following an environmental audit.

Further Monitoring institutions may include, but are not limited to:

- **The National Heritage Council of Namibia:** for archaeological and heritage resources (sites and objects).
- **Ministry of Mines and Energy:** for compliance to the relevant prospecting and exploration requirements, including petroleum products' storage and handling on site.

3.2 The Exploration Manager (or the Proponent)

The Manager, *who may also be the Proponent*, is responsible for the following:

- Development and management of schedules for daily activities in compliance with the EMP.
- Managing/overseeing the implementation of this EMP, and updating and maintaining it when necessary.
- Ensuring that relevant commitments contained in the Management Action Plan are adhered to.
- Ensuring that the relevant staff is trained in procedures entailed in their duties.
- Through consultations and cooperation with the ECO/SHE officer, issuing fines to individuals who may be in breach of the EMP provisions, and if necessary, removing such individuals from the site.
- Setting up and managing the schedule for the day-to-day activities.
- Ensuring all environmental, health and safety incidents are recorded and documented.

3.3 Safety, Health and Environmental (SHE) Officer or Environmental Control Officer (ECO)

The SHE or ECO (as appropriate) is responsible for ensuring that project activities are completed on time, efficiently and sustainably. The ECO/SHE Officer's duties and responsibilities include:

- Planning and carrying out site inductions to the workers on-site and visitors to the worksite(s).
- Ensuring compliance with relevant environmental and related authorisations and license conditions.
- Ensuring that the requirements of the EMP are carried out during applicable activities throughout the project life span.
- Monitoring the overall implementation of the EMP
- Identifying and appointing of appropriately qualified specialists (were necessary) to undertake the programmes in a timeous manner and to acceptable standards.

3.4 Public Relations Officer (PRO)

The Public Relations Officer (May also be the project manager) is responsible for the following tasks:

- Managing all public relations issues.
- Coordination with all relevant interested and affected parties/stakeholders
- Liaison between the affected property owners and the Proponent.
- Ensuring effective communication with stakeholders (affected farmers or landowners or occupiers of land), media (if necessary) and the public.
- Preparing and submitting public relations reports, if required.
- Collaborating with personnel and maintaining project-related open communication among personnel.

3.5 Archaeology: Chance Finds Procedure (CFP) Implementation Roles

The following personnel have been assigned responsibilities as per the Chance Finds Procedure (**Appendix 1**) as per the provided Archaeological and Heritage Assessment Studies conducted for the proposed activities:

A. Operator

To exercise due caution if archaeological remains are found

B. Foreman

To secure site and advise management timeously

C. Superintendent

To determine safe working boundary and request inspection

D. Archaeologist

To inspect, identify, advice 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 of the following sections.

4 ENVIRONMENTAL MANAGEMENT & MONITORING ACTION PLANS

The EMP includes environmental management action plan and a monitoring plan. The management action plan outlines the mitigation measures provided to the potential negative impacts associated with the proposed project. The aim of this action plan is to avoid the identified potential impacts where possible, and where avoidance is impossible, measures are provided to reduce impact significance.

4.1 Key potential Negative Impacts

The key identified potential negative impacts are as follows:

- Impacts on Biodiversity and Land (Clearing of Vegetation, Alien Invasive Plants, Wildlife and Livestock, Birds, Fire)
- Impact on Water Resources
- Generation of dust
- Generation of waste
- Visual impacts (scars) on landscape,
- Potential Impact on Surrounding Soils
- Vibrations and noise from exploration works
- Possible disturbance to heritage/archaeological resources
- Potential occupational health and safety risks,
- Vehicular traffic safety
- Impacts associate with closure and decommissioning of exploration works. (rehabilitation)

4.2 The Management and Mitigation of Potential Key Negative Impacts

The management and mitigation measures for the potential adverse impacts are presented in **Table 2** for the planning, operational and maintenance phases.

The required management and mitigation plan actions are presented in the table as: (a) Environmental aspect and issues for which management actions are required, (b) proposed impact mitigation measures, (c) key performance indicator (KPI) for monitoring success levels of management actions, (d) responsible person(s) for implementing the proposed management actions, (e) resources required for implementing management actions and monitoring and (f) implementation timeframes for the proposed management actions.

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Table 2: Management Action Plan for the Planning, Prospecting & Exploration Phases

Aspect	Impact	Management & Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Person	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 SHE 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>A SHE officer or Environmental control Officer (ECO) is appointed.</p>	-Proponent	-Records of EMP implementation Plans and Systems	Pre-exploration (project activities)
Authorizations	Lack of Agreements, Permits/ Licenses	<p>-All the required agreements and licenses or permits should be applied for and signed, before commencement of works on the EPL, or as required.</p> <p>-The permits, agreements referred to herein include land access & land use agreements, compensation agreements (if necessary), Rehabilitation</p>	<p>-All applicable permits and licenses to be obtained from relevant authorities and kept on site for records keeping and future inspections</p> <p>-Access and Rehabilitation Agreements signed</p>	-Proponent	-Permits and Licenses	Prior to exploration works

Aspect	Impact	Management & Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Person	Resources	Timeline
		commitment agreements, as well as petroleum storage permits (if necessary).	and obtained from landowners or occupiers of land on time, prior to planned commencement date of onsite works		Signed Land Access and Use Agreements	
Communication between the Proponent and property owners	Lack of communication (proper liaison) between property/farm and Proponent with regards to land use	<p>-The Proponent should appoint a Public Relations Officer (PRO) to liaise with the land owners and/or custodian</p> <p>-The PRO should be introduced to the farm/property owners and share contact details prior to undertaking activities, for easy communication during the exploration activities.</p> <p>-A clear communication procedure/plan, which includes a grievance mechanism should be compiled</p>	<p>-A PRO is appointed</p> <p>-Ongoing Stakeholders' and Public Engagement & Consultation throughout the project cycles, when and as required</p>	-Proponent	<p>-Complaint's logbook</p> <p>-PRO contact details to be provided to the affected farmers/landowners</p> <p>-Records of Stakeholders' and Public Consultations</p>	PRO appointment (Prior to project activities) and their responsibilities throughout the rest of the project phases
Employment	Creation of employment opportunities for the locals	<p>-Preference for employment of general and semi-skilled workers should be prioritised towards local residents. Employment of non-residents, especially should be justified,</p> <p>-Equal opportunity should be provided for men and women, when and where possible.</p>	<p>-Number of locals employed for exploration activities</p> <p>-Consultation with the relevant local authority office and local development committee</p>	-Proponent in collaboration with the Exploration Manager (if necessary)	<p>-Record of employees</p> <p>-Constituency Council office to assist in identifying unemployed people</p>	Pre-project activities and when necessary, throughout project operation.

Aspect	Impact	Management & Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Person	Resources	Timeline
			-Notification via the Constituency Office			
Specialised procurement of services	Exploration contractors and other services.	The Proponent should use locally derived services where practically possible	-Number of hired contractors	Proponent Site/Project Manager	-Record of hired or contracted companies or services providers	Pre-project activities and when necessary, throughout
Corporate Social Responsibility (CSR)	Social commitment failures	-Consider providing and/or contributing to local service needs as per community requests (submitted in writing, and with written agreements). -The Proponent should fulfil their promises of CSR, upon proper consultation with the local development committees to establish the community's needs.	-Visible commitment to ensure that the CSR agreed upon is fulfilled	-Proponent	-Office of the Constituency Councillor -Local Development Committee to monitor implementation of the CSR	Throughout the prospecting & exploration phase
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	-Compliance monitoring conducted monthly for the	-SHE Officer	Bi-annual Environmental Audit reports	Throughout the operation phase and as required

Aspect	Impact	Management & Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Person	Resources	Timeline
		<p>site and to old workers (as a refresher) every 6 months.</p> <p>-All site personnel should be aware of necessary health, safety, and environmental considerations applicable to their respective work</p> <p>-The implementation of this EMP must be monitored.</p> <p>-The site should be inspected, and a compliance audit done throughout the project activities, monthly and compliance monitoring reports submitted to the DEAF bi-annually.</p> <p>-An EMP non-compliance penalty system should be implemented on site.</p>	<p>exploration phase and should be recorded</p> <p>-EMP Refresher training for employees/workers every 6 months</p> <p>-Timely renewal of the Environmental Clearance Certificate (ECC) every 3 years</p>		Record the EMP training conducted	
Pastoral land	Impact on grazing areas	<p>-Any unnecessary removal or destruction of grazing land, due to exploration activities should be avoided.</p> <p>-Vegetation found on the site, but not in the targeted exploration areas should not be removed but left to preserve biodiversity and grazing land.</p>	<p>-Little damage on grass cover and vegetation</p> <p>-Maximum effort implemented to curb loss of grazing areas with the EPL</p>	<p>-Exploration Manager</p> <p>-SHE Officer</p>	-None	Throughout the phases

Aspect	Impact	Management & Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Person	Resources	Timeline
		<p>-Workers should refrain from driving off road and creating unnecessary tracks that may contribute to soil erosion and loss of grazing land.</p> <p>-Environmental awareness on the importance of the preservation of grazing land for local livestock should be provided to the workers</p>				
Communication between the Proponent and other neighbouring land users and custodians	Lack of communication (proper liaison) between other land users and Proponent with regards to land use	<p>The PRO should be introduced to and share communication contact details with the neighbouring land users to facilitate communication during the exploration activity.</p> <p>The Proponent should compile a clear communication procedure/plan which should include a grievance and response mechanism.</p>	<p>PRO is part of the project personnel.</p> <p>Ongoing Stakeholders' and Public Engagement & Consultation throughout the project cycles, when and as required</p>	PRO	<p>Complaint's logbook</p> <p>PRO contact details to be provided to the affected land users.</p> <p>Records of Stakeholders' and Public Consultations</p>	Throughout the project activities
Land use (physical soils)	Physical soil/land disturbance and loss of topsoil	-Overburden should be handled more efficiently during exploration works to avoid	-No proliferation of informal vehicle tracks.	SHE Officer/ECO	-Complaint's logbook	Throughout the exploration phase

Aspect	Impact	Management & Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Person	Resources	Timeline
		<p>erosion when subjected erosional processes.</p> <p>-Prevent creation of huge piles of waste rocks by performing sequential backfilling, especially the exploration trenches.</p> <p>-Stockpiled topsoil and overburden waste rocks should be used to backfill the explored and disturbed site areas/spots during (where possible) and at the end of the exploration program.</p> <p>-Soils that are not within the intended and targeted footprints of the site areas should be left undisturbed and soil conservation implemented as far as possible.</p> <p>-Project vehicles/machinery should stick to access roads provide and or meant for the project operations but not to unnecessarily create further tracks on site by driving everywhere resulting in soil compaction</p>	<p>-No new erosion gullies.</p>			

Aspect	Impact	Management & Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Person	Resources	Timeline
Water resources	Over-abstraction (Water demand and availability)	<p>The Proponent should be water-use conscious and consider voluntary water use reduction by sticking to their proposed threshold volumes or less when possible.</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. Water used to cool off operational equipment may 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>	<p>- Water supply agreements</p> <p>Proof/ recording/ quantification of water saving efforts.</p>	<p>Proponent</p> <p>Site/Project Manager</p>	<p>Water supplier</p> <p>Proponent</p> <p>Water storage tanks on site</p>	<p>Once off supply agreement</p> <p>Throughout the phase</p>
Soil and water resources	Soil and water pollution	Oil and wastewater spill control preventive measures should be in place on site to manage soil contamination, and prevent spills from reaching surface and ground water bodies.	-No complaints of pollutants on the soils and eventually in the water due to exploration activities	-SHE Officer	<p>-Complaint's logbook</p> <p>-Waste containers</p>	Throughout exploration phase

Aspect	Impact	Management & Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Person	Resources	Timeline
		<p>Some of the preventive measures that can be implemented include:</p> <p>(a) 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>(b) Maintain equipment and fuel storage tanks to ensure that they are in good condition to prevent leaks and spills.</p> <p>(a) The oil storage and use locations should be visually inspected for container or tank condition and spills.</p> <p>(b) Maintain a fully provisioned, easily accessed spill kit. Spill kits should be located throughout the active project sites contain the floor dry absorbent material and absorbent booms, pads, mats. These would be suitable for ground surface areas that are covered mainly by hard rocks.</p> <p>-All project employees should be sensitized to the impacts of soil pollution and advised to</p>	<p>-No visible oil spills on the ground or contaminated/polluted spots.</p>		<p>-Non-permeable material to cover the ground surface at areas where hydrocarbons and potential pollutants are utilized.</p>	

Aspect	Impact	Management & Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Person	Resources	Timeline
		<p>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 and mentor new workers as they get hired.</p> <p>-Exploration 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.</p>				

Aspect	Impact	Management & Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Person	Resources	Timeline
		<p>-In cases of accidental fuel or oil spills on the soils from vehicles, machinery and equipment, the polluted soil should be removed immediately and disposed of in a designated waste type container for later disposal. The removed polluted soil should either be completely disposed of or cleaned/treated and returned to where it was taken from on site. It may also be replaced with cleaner soil.</p> <p>-Although fuel (diesel) required for exploration equipment will be stored in a tank, drip trays must be readily available on this trailer and monitored to ensure that accidental fuel spills along the tank trailer path/route around the exploration sites are cleaned on time (soon after the spill has happened).</p> <p>-Polluted soil must be collected and transported away from the site to an approved and appropriately classified hazardous waste treatment facility.</p>				

Aspect	Impact	Management & Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Person	Resources	Timeline
		<p>-Washing of equipment contaminated by hydrocarbons, as well as the servicing of vehicles should take place at a dedicated area, where contaminants are prevented from contaminating soil or water resources.</p> <p>-Toilet water should be treated by periodically emptying before reaching capacity and transported to a wastewater treatment facility.</p>				
Biodiversity	Loss of Fauna and Flora	<p>Flora:</p> <p>The Proponent should avoid unnecessary removal of vegetation, to promote 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 vehicles and machinery should be restricted to existing roads and tracks to prevent unnecessary damage to the vegetation.</p>	<p>-Incident reports of illegal hunting of wildlife by the project crew/workers.</p> <p>-No complaints of livestock theft, snaring or killing of livestock and wildlife by the project personnel</p> <p>-No disturbance to unmarked areas.</p> <p>No complaints from locals regarding</p>	-SHE Officer	<p>- Barricading tape (to indicate working areas)</p> <p>-Complaint's logbook</p>	During site set up, and throughout the exploration phase

Aspect	Impact	Management & Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Person	Resources	Timeline
		<p>Onsite vegetation should not be cut, damaged, or used for any project related activities without prior approval from the Parks Division.</p> <p>Plants found along the exploration site, should not be removed. Therefore, care should be taken when prospecting and exploration activities are implemented.</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, therefore large scale vegetation clearing should only be applied where necessary and within the development footprint.</p> <p>Plants on sites should not be unnecessarily removed. Care should be taken when</p>	<p>unauthorised vegetation removal or cutting down of trees</p>			

Aspect	Impact	Management & Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Person	Resources	Timeline
		<p>extracting mineral species without destroying the vegetation and its surrounding.</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, if any, to prevent disturbances in the current preserved ecosystems.</p> <p>Environmental awareness on the importance of floral biodiversity preservation should be provided to the workers.</p> <p>Any identified alien invasive species may immediately be eradicated</p> <p>Fauna:</p> <p>-Workers should refrain from disturbing, killing or stealing livestock and wildlife, as well as small soil and rock outcrops' species found on site.</p> <p>-Poaching of wildlife from the area is strictly prohibited.</p>			<p>-Anti-poaching unit of the Namibian Police Force</p> <p>-MEFT's Wildlife Protection Unit</p>	

Aspect	Impact	Management & Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Person	Resources	Timeline
		<p>- Avoid sites with large trees with raptors nests in them.</p> <p>-Environmental awareness on the importance of biodiversity preservation should be provided to the workers.</p>				
Land Use	Conflict between neighbouring land uses and exploration activities	<p>Prospecting and 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.</p> <p>Project works should be limited to the active EPL sites only.</p> <p>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 various existing land uses within and around the EPLs.</p>	<p>Land access and use permits/authorizations.</p> <p>Compliance with conditions set within operational permits by relevant and affected authorities.</p> <p>Little to no complaints of significant interference from the neighbouring land users</p>	<p>PRO</p> <p>Proponent</p> <p>SHE Officer/ECO</p>	Proponent Relevant authorities (MEFT, MME, etc.)	Throughout the Operational phase
Illegal hunting	Illegal hunting of wildlife	<p>No wildlife hunting is permitted.</p> <p>Site personnel should refrain from killing/poaching or intentionally disturbing wildlife,</p>	<p>Incident reports of illegal hunting of wildlife by the exploration crew.</p>	SHE Officer	Complaint's logbook	During site set up, and throughout

Aspect	Impact	Management & Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Person	Resources	Timeline
		or any faunal species found on site and around the EPL.			MEFT Parks' Division Anti-poaching Police Unit	operational phase
Air Quality	Air quality (dust)	<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>-The Proponent should ensure that the exploration schedule is limited to the number of days of the week agreed upon in access agreements.</p> <p>-Dust control measures may be considered to suppress dust, in the event that there are local complaints of high levels of dust generation.</p> <p>-Dust masks, eye protective glasses and other respiratory personal protective equipment (PPE) such as face masks should be provided to the workers at drilling sites, where they are exposed to dust.</p> <p>-The impact mitigation measures should be acknowledged in the relevant</p>	<p>-Dust suppression measures implemented</p> <p>-Visible efforts to curb high levels of dust</p>	<p>-Exploration Manager</p> <p>-SHE Officer</p>	<p>-Grievance logbook</p> <p>-Dust suppression water tanks</p>	Throughout the phases

Aspect	Impact	Management & Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Person	Resources	Timeline
		<p>farm access agreements as required by law on commercial farms. This should also apply to resettled/communal farms, if any.</p> <p>-Drilling and excavating equipment should be regularly maintained to ensure drilling and excavation efficiency and so to reduce dust generation and harmful gaseous emissions.</p>				
<p>Littering and Waste management (General waste and sanitation)</p>	<p>Environmental pollution</p>	<p>-Workers should be sensitized to dispose of waste in a responsible manner and not to litter.</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, and no waste must be left on the sites.</p> <p>-The exploration site should be equipped with separate waste bins for hazardous and general/domestic waste.</p>	<p>-A register of all waste types generated on site is kept on site.</p> <p>-All waste disposal permits from relevant authorities are available on site.</p> <p>-No littering on and around the project site</p>	<p>-Proponent</p> <p>-Exploration Manager</p> <p>-SHE Officer</p>	<p>-Funds to acquire waste storage bins/ drums; and transport all waste from the site.</p> <p>-Waste storage containers</p>	<p>Throughout the phases.</p>

Aspect	Impact	Management & Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Person	Resources	Timeline
		<p>-Hazardous waste, including emptied chemical containers should be safely stored on site where they cannot be accessed and used by uniformed locals for personal use. These containers can then be transported to the nearby approved hazardous waste sites for safe disposal. No waste should be improperly disposed of on site or in the surroundings, i.e., on unapproved waste sites.</p> <p>-Oil spills should be taken care of by removing and treating soils affected by the spill.</p> <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</p>				

Aspect	Impact	Management & Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Person	Resources	Timeline
		<p>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 sites.</p>				
	<p>Wastewater generated by exploration workers living on-site.</p>	<p>-Washing of hydrocarbon contaminated equipment, 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> <p>-Sewage waste should be stored as per the portable chemical toilets supplied on site and regularly disposed of at the nearest wastewater treatment facility.</p> <p>-Emptying of chemical toilets according to the manufacturer's specifications.</p> <p>-All wastewater and hydrocarbon substances and other potential pollutants</p>	<p>-Adequate toilet facilities on site.</p>	<p>-Exploration Manager</p> <p>-SHE Officer</p>	<p>-Chemical toilets, waste treatment agents/chemicals</p> <p>-Wastewater discharge permits</p>	<p>At site setup and throughout exploration phase</p>

Aspect	Impact	Management & Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Person	Resources	Timeline
		<p>associated with the project activities should be contained in designated containers on site and later disposed of at the nearest approved waste sites in accordance with MAWLR's Water Environment Division standards on wastewater discharge into the environment. This is to ensure that these hazardous substances do not infiltrate into the ground and affect the local groundwater quality.</p>				
Noise	Noise	<p>-Noise from project vehicles and equipment on the working sites of the EPL should be at acceptable levels.</p> <p>-Exploration hours should be restricted to between 08h00 and 17h00, or at the times agreed upon in writing between the Proponent and land owners, in order to avoid noise pollution and vibrations generated by exploration equipment before or after hours, as agreed upon.</p> <p>-When operating the drilling machinery onsite, workers should be equipped with</p>	<p>-Noise generating activities such as drilling limited to weekdays only.</p> <p>-PPE provided to workers operating noisy equipment and in noisy site areas.</p>	<p>-Exploration manager</p> <p>-SHE Officer</p>	<p>-Clearly written placards with operational hours in a day placed at one of the visible access roads to sites</p>	Throughout the project phases

Aspect	Impact	Management & Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Person	Resources	Timeline
		<p>personal protective equipment (PPE) such as earplugs to reduce exposure to excessive noise.</p> <p>-The transportation of exploration materials, equipment and machinery should be limited to once or twice a week only.</p> <p>-Target exploration sites that may be found to be within less than 1 km from the residences (farmhouses) should be avoided at all costs. This is done to preserve tranquillity of the residents.</p>				
Health and Safety	Occupational & Community Health and Safety	<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,</p>	<p>-Compilation of Comprehensive Health and Safety Plan</p> <p>-Regular health screening of workers</p> <p>-Bi-annual health and safety audits done.</p> <p>-All onsite workers and visitors equipped with PPE.</p>	<p>-Exploration Manager</p> <p>-Proponent</p> <p>-SHE Officer</p>	<p>-Health and Safety Policies</p> <p>-Funds to acquire health and safety related equipment. and to pay for employee medical services</p> <p>-First Aid training for at least 1 personnel at each work site</p>	

Aspect	Impact	Management & Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Person	Resources	Timeline
		<p>dust masks, safety glasses, etc.</p> <p>-Heavy vehicle, equipment and fuel storage site should be properly secured, and appropriate warning signage placed where visible.</p> <p>-Drilled exploration boreholes that are no longer in use or waiting to be used after drilling should be properly marked for visibility and capped/closed off.</p> <p>-Ensure that after completion of the exploration, drill cuttings are put back into the holes and the holes filled and levelled, or removed from site to a suitable dumping facility.</p> <p>-An emergency preparedness plan must be compiled, and all personnel appropriately trained.</p> <p>-Workers must not be allowed to consume any intoxicants prior to and during working hours, nor allowed on site when under the influence, as this may lead to mishandling of equipment, resulting in injuries</p>				

Aspect	Impact	Management & Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Person	Resources	Timeline
		and other health and safety risks. -Any potential dangerous or risky areas identified on site must be equipped with cautionary signs.				
Fires	Accidental fire outbreak	-Portable fire extinguishers should be provided on site. -No open fires to be created by project personnel. -Potential flammable areas and structures should be marked as such with clearly visible signage.	-No Fires recorded (due to presence of workers)	-Exploration Manager -SHE Officer	-Fire extinguishers (1 per vehicle) and 1 per working site	Throughout the phases
Archaeology and heritage	Accidental disturbance and destruction of archaeological or heritage objects and sites	-The management and mitigations or recommendation to minimize impact on archaeological and heritage resources are not available. The only provisional recommendation to the study hereto is that: The Proponent is advised to make an application to the National Heritage Council for a Consent to allow a Detailed Assessment of the area in relation to the proposed activity	-Preservation of all artefacts that are discovered around project area -Cessation of work upon discovery/unearthing of unknown objects	-Exploration Manager -SHE Officer -Archaeologist	-Technical Consultant (Archaeologist to help identify and advise on heritage object discovery) -Salvage equipment -Flag tapes -GPS (site marking)	-Archaeologist to be present on-site during excavations

Aspect	Impact	Management & Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Person	Resources	Timeline
		believed to be an archaeological or heritage site.				
Social conflicts	Job seeking, and differing norms and cultures	<p>-The Proponent should prioritize the employment of local people, and only if necessary and due to lack of skills in the area, non-resident workers may be given some opportunities. This is to avoid the influx of outsiders into the area for works that can be done the locals.</p> <p>-The locals to be employed during the project phases should be provided with the necessary training of skills required for the project to avoid bringing in non-resident workers. This way, skills development and transfer is ensured in the local communities.</p> <p>-non-resident workers that may be employed (due to their unique work skills) on site should be sensitized on the importance of respecting the local values and norms, to ensure a harmonious coexistence with local</p>	<p>-No complaints of property theft or damage related to project workers</p> <p>-More local workers who are familiar with the values, and way of living in the area</p>	<p>-Exploration Manager</p> <p>-SHE Officer</p>	<p>-Grievance logbook</p> <p>-Employment Code of Conduct</p>	Throughout the phases

Aspect	Impact	Management & Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Person	Resources	Timeline
	Property intrusion and disturbance	<p>communities during the duration of the project.</p> <p>-The Proponent should inform their workers on the importance of respecting the locals' properties by not intruding or damage their homes, fences or snaring and killing their livestock.</p> <p>-Any workers found guilty of intruding private property should be dealt with as per their employer' (Proponent)'s code of employment conduct</p> <p>-Site workers should be advised to respect the community and local's private properties, values, and norms.</p> <p>-No worker should be allowed to wander in people's private yards or fences without permission.</p> <p>-Site workers are not allowed to kill or in any way disturb local livestock.</p> <p>-No worker should be allowed to, without permission, cut down or damage trees belonging to property owners.</p>	<p>-Project workers are educated on what is expected of them while on site in relation to the private and public properties</p> <p>-No complaints of damage to private or public properties by project workers or activities</p>	<p>-Exploration Manager</p> <p>-PRO</p> <p>-SHE Officer</p>	<p>-Anti-property intrusion or damage pamphlets or placards placed at every exploration site</p> <p>-Fines for any intentional damage or disturbance of private or public property</p>	Throughout the phases

Aspect	Impact	Management & Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Person	Resources	Timeline
Vehicular Traffic	Traffic safety	<p>-The transportation of exploration materials, equipment and machinery should be kept to a minimum to reduce the pressure on local roads.</p> <p>-Heavy truck loads should comply with the maximum allowed speed limit for respective vehicles while transporting materials and equipment/machinery on the public and access roads (40km/h)..</p> <p>-Drivers of all project phases' vehicles should be in possession of valid and appropriate driving licenses, and adhere to the road safety rules.</p> <p>-Drivers should drive slowly (40km/hour or less) and be on the lookout for livestock and wildlife as well as residents/travellers.</p> <p>-The Proponent should ensure that the site access roads are well equipped with temporary road signs conditions to cater for vehicles travelling to and</p>	<p>-Site access road permits obtained, and requirements fulfilled</p> <p>-No complaints from members of the public regarding vehicular traffic issues related to the project</p> <p>-All personnel operating the project vehicles and machinery are appropriately licensed and possession of valid driving licenses.</p> <p>-The vehicles are driven at the recommended speed.</p> <p>-Demarcated areas for parking, offloading, and loading zones are on sites</p>	<p>-Exploration Manager</p> <p>-SHE Officer</p>	<p>-Vehicular traffic compliance to be included in the annual environmental audit reporting</p>	<p>Throughout the phases.</p>

Aspect	Impact	Management & Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Person	Resources	Timeline
		<p>from site throughout the project's life cycle.</p> <ul style="list-style-type: none"> -Project vehicles should be in a road worthy condition and serviced regularly to avoid accidents owing to mechanical faults. -Vehicle drivers should only make use of designated site access roads provided, and as agreed. -Vehicle's drivers should not be allowed to operate vehicles while under the influence of alcohol or any other intoxicants. -Sufficient parking areas for all project vehicles should be provided for and clearly demarcated on sites. -The Proponent should make provision for safe offloading and loading areas for materials and equipment on sites. -No heavy trucks or project related vehicles should be parked outside the project site boundary or demarcated areas for such purpose. -To control traffic movement on site, deliveries should be 				

Aspect	Impact	Management & Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Person	Resources	Timeline
		<p>carefully scheduled. This should ideally be during weekdays and between the working hours.</p> <p>-If site access roads are in poor conditions, they should be upgraded to an acceptable standard to accommodate project related vehicles.</p>				
Local resources and services infrastructure	Overuse of existing roads and water resources	<p>-The Proponent should consider re-using and recycling water on site to limit abstraction of fresh water from the local sources.</p> <p>-The amount of heavy vehicles transporting material and services to site should be kept at a minimum, with a schedule arranged as efficiently as possible.</p> <p>-The Proponent should consider frequent maintenance of local roads around their operations to ensure that the roads are in a good condition for other roads users from and outside the area</p>	<p>The local roads are frequently maintained by the Proponent and movement of heavy trucks is limited</p> <p>-Water saving measures are implement</p>	<p>-Proponent</p> <p>-Exploration Manager</p>	<p>-Road maintenance excavator/bulldozer</p> <p>-onsite water storage tanks</p>	Throughout the phases

4.3 Rehabilitation and Decommissioning measures

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 the rehabilitation program, characteristics of the site, nature of disturbance, rehabilitation methods, as well as resource availability.

The management and mitigation measures (action plan) for the rehabilitation and decommissioning of explored sites and site works, respectively are presented in **Table 3**.

Table 3: Management and Mitigation Measures to rehabilitate the explored sites and decommissioning of the site works

Aspect	Impact	Management & Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Person	Resources	Timeline
Rehabilitation	Explored and damaging of site land and soils	<ul style="list-style-type: none"> -All project related exploration boreholes that are no longer in use should be backfilled and capped. -Utilize stockpiled subsoil and topsoil to fill the excavated pits/trenches progressively back, i.e., stockpiled topsoil should be levelled during exploration activities. -Backfilling of all excavated pits and trenches with loose material, but not only be filled with sand alone, as wind will scours the sand and re-establish the holes. -Provision of both financial and technical resources for progressive rehabilitation and post-exploration activities should be made. 	<ul style="list-style-type: none"> -Capped boreholes and backfilled pits -No stockpiled topsoil (topsoil is levelled after completion of each work) -Visible signs of stockpiled topsoil -Annual update of finances reserved for decommissioning and rehabilitation 	-Proponent	<ul style="list-style-type: none"> -Record of boreholes drilled, and pits excavated (if any) -Waste containers on sites -Photo records of backfilled sites -Records of campsite and other structures onsite Records of finances set aside for decommissioning activities 	Pre-site abandonment
Decommissioning	Structures and infrastructure	<ul style="list-style-type: none"> -All accumulated waste (hazardous, solid, and general) up until the cessation of exploration activities will be removed site and transported to 	<ul style="list-style-type: none"> -No sign of waste or littering seen on site and around site areas -project structures and infrastructure Campsite dismantled, 	-Proponent		

Aspect	Impact	Management & Mitigation Measure(s)	Key Performance Indicator (KPI)	Responsible Person	Resources	Timeline
		designated off site waste management facilities -Removal of project vehicles and equipment from the site and taken to designated parking facility off site. -All project support structures such as ablution facilities, campsites, temporary field offices 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.	and materials taken away from site			

4.4 Environmental and Social Monitoring

To support and ensure that the proposed management and mitigation measures are achieving the desired results throughout the project phases, a monitoring plan must be implemented alongside the mitigation plan. **Table 4** presents the required environmental and social monitoring in terms of the potential impacts identified, parameters to be monitored and monitoring objective. Table 4 also includes the reporting structures for monitoring, frequency, methods to be used, reporting structure, any thresholds that apply and relevant recommended actions. The monitoring exercise will be done according to the relevant project stage or phase; and for monitoring of mitigation implementation in the prospecting and exploration phase, the reporting structure ends with the Exploration Manager.

Table 4: Monitoring requirements to manage and mitigate the potential adverse impacts

Impact	Parameter to be Monitored	Monitoring Objective	Key Performance Indicator (KPI)	Methods of Monitoring	Frequency	Responsible Party	Reporting structure	Threshold	Action if threshold is exceeded
Air quality									
Increase in dust generation, which might negatively affect occupational and residential respiratory health.	Complaints from public about increased in dust generation.	To reduce public complaints and prevent negative changes in air quality due to exploration activities	No complaints from the public about increased dust generation.	Inspection of complaints logbook.	Weekly	SHE Officer	SHE Officer> Exploration Manager	A logged complaint	Dust suppression around working areas to reduce fugitive dust
Hydrocarbon emissions from vehicles	Complaints from the public about increased vehicles fumes	Same as above.	No complaints from the public about increased vehicle emissions	Inspection of complaints logbook.	Weekly	SHE Officer	SHE Officer> Exploration Manager	A logged complaint	Servicing of vehicles and machinery by a certified service provider
Poaching (Illegal hunting)									
Illegal hunting of wildlife	Reported poaching incidents by projects team	To prevent illegal hunting of wildlife	Incidents reports of illegal hunting of wildlife by exploration workers.	Consultation with the local Police Service for reported	Weekly	SHE Officer	SHE Officer> Exploration Manager> local Police Service (Anti-poaching Unit)	An incidents report logged with the local	Appropriate action will be decided by the local Police Service

Impact	Parameter to be Monitored	Monitoring Objective	Key Performance Indicator (KPI)	Methods of Monitoring	Frequency	Responsible Party	Reporting structure	Threshold	Action if threshold is exceeded
				incidents of poaching.				Police Service	
Habitat loss (Biodiversity)									
Localised loss of habitat and vegetation	Loss of habitat	To prevent loss of habitat outside areas of interest	No disturbance to unmarked areas within the project area	Visual observation	Weekly	SHE Officer	SHE Officer> Exploration Manager	Vegetation clearance outside of marked areas.	Rehabilitation of affected areas to the satisfaction of the SHE Officer
Occupational and Community Health and Safety									
No health and safety plan for exploration activities.	Compiled health and safety plan for exploration activities.	To prevent health and safety impacts	No significant health and safety incidents (i.e., serious injuries or loss of life)	Visual observation Inspection of complaints logbooks	Daily/ weekly	SHE Officer and Exploration Manager	SHE Officer> Exploration Manager	Health and safety incident	Remedy the consequences
Potential increase in outbreak of wildfires due to project activities	Occurrence of wildfires	To prevent environment damage caused by wildfires	No wildfires recorded (due to presence of exploration workers)	Visual observation	Daily	SHE Officer	SHE Officer> Exploration Manager > local police service	Outbreak of wildfires due to the exploration workers	Rehabilitation of affected areas
Archaeology and cultural heritage (to be updated upon completion of the required Detailed Archaeological and Heritage Assessment Study)									
Potential disturbance of archaeological and cultural heritage resources	Presence or unearthing of archaeological or cultural heritage resources	To prevent destruction of artefacts and sites	Preservation of all artefacts and sites that are discovered within the site boundary or around the project site area	Inspection of records of findings	Daily	SHE Officer Operator	Operator>Foreman> Superintendent>SHE Officer>Project Archaeologist>National Heritage Council (NHC)	Unearthing of archaeological or cultural heritage resources	Cease all activities on site and wait for NHC to inspect site and give further instructions / actions

Impact	Parameter to be Monitored	Monitoring Objective	Key Performance Indicator (KPI)	Methods of Monitoring	Frequency	Responsible Party	Reporting structure	Threshold	Action if threshold is exceeded
Employment creation and Corporate Social Responsibility (CSR)									
Creation of employment	Creation of employment opportunities	To ensure that locals benefit from the project	Number of locals employed during exploration activities	Inspection of employment records	Monthly	Exploration Manager	Exploration Manager or Proponent	Number of those employed	None
Noise									
Potential increase in noise	Above ambient noise levels.	To ensure that generated noise does not disturb residents.	Complaints from residents about noise generated.	Inspection of complaints logbook	Weekly	SHE Officer	SHE Officer> Exploration Manager	A logged complaint about above normal noise levels	Revision of site activities
Vehicular Traffic									
Increase in traffic density on declared Roads Authority (RA) roads or damage to these.	Complaints from the public about increase in traffic on the roads. Complaints about damage to RA roads caused by movement of project vehicles and machinery.	To ensure continued ease of access to RA roads by residents	No complaints from the public about increase of off traffic due to exploration activities	Inspection of logbooks	Weekly	SHE Officer	SHE Officer> Exploration Manager > Roads Authority	A logged complaint about traffic increase or damage to RA roads	Find alternative access roads for the workforce. Rehabilitation of affected roads
Social nuisance: Property invasion/disturbance and damage									
Potential intrusion or	Unauthorized intrusion and	To prevent crashes	No complaints of property damage	Liaison with property	Monthly	PRO	Exploration Manager (or Proponent)>PRO>Landowner	Arising new complaints	PRO to warn the personnel

Impact	Parameter to be Monitored	Monitoring Objective	Key Performance Indicator (KPI)	Methods of Monitoring	Frequency	Responsible Party	Reporting structure	Threshold	Action if threshold is exceeded
damage/destruction of private or public properties	or damage to properties	and tensions between the Proponent and the land/property owners	or intruding by project personnel	owners or occupiers of land			s/Occupiers of land or custodian		on respecting people's properties. If persists then Code of Conduct to be implemented
Environmental Pollution									
Environmental pollution from solid waste during exploration activities.	Scattered litter	To prevent littering at the general project area	No visible litter around the project area	Visual observation	Daily	SHE Officer	SHE Officer> Exploration Manager	Visible littering around project site	Clean-up of the affected areas and ensuring exploration workers utilise waste containers provided.
Soil and water pollution	Complaints from farmers or occupiers of land within the project sites	To prevent contamination of site soils and water sources/bodies on site	No complaints from farmers about visible pollution on site	Inspection of complaints logbooks	Weekly	SHE officer	SHE Officer> Exploration Manager	A logged complaint	Further consultations with the farm/landowners or custodian
Site Rehabilitation									
Soil and land disturbance because of exploration activities.	Abandoned and stockpiled topsoil as well as very disturbed land surface	To prevent major soil and land damage by project activities	No major soil and land disturbance	Visual observation	Daily	SHE Officer	SHE Officer> Exploration Manager	Visible soil and land disturbance	Effective progressive backfilling of topsoil and rocks

Impact	Parameter to be Monitored	Monitoring Objective	Key Performance Indicator (KPI)	Methods of Monitoring	Frequency	Responsible Party	Reporting structure	Threshold	Action if threshold is exceeded
Rehabilitation dissatisfaction	Satisfaction of farmers towards rehabilitation measures taken by Proponent	To prevent leaving the exploration sites in a damaged/un-rehabilitated condition	Land/farm owners satisfied with the rehabilitation measures	Visual observation	weekly	SHE Officer	SHE Officer > Exploration Manager	Visible soil and land disturbance	Effective progressive backfilling of topsoil and rocks, and revegetation, where necessary

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.

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, advice management, and recover remains.

Procedure:

Action by person identifying archaeological or heritage material

- 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 an 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.

The competent authorities' contact details to report archaeological sites or objects (Exploration Manager and contractor) are as follows:

- National Heritage Council (NHC) of Namibia (061 244 375) or direct contact with the Regional Heritage Officers at the NHC 061 301 903
- National Museum (+264 61 276800),
- National Forensic Laboratory (+264 61 240461).



Environmental Audit Report for Exclusive Prospecting License (EPL) No. 7352 Located Northwest of Dordabis in the Khomas Region

ECC Number: ECC- 00422

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1 INTRODUCTION

1.1 Project Background

This environmental audit report is prepared on behalf of Lodestone Namibia (Pty) Ltd (hereinafter referred to as *Lodestone Namibia* or *The Proponent*), the holder of Exclusive Prospecting License (EPL) 7352. Lodestone Namibia was issued an Environmental Clearance Certificate (ECC-00422) on 13 December, 2019, to permit exploration works on EPL 7352 until 13 December 2022.

This environmental audit report provides a summary of the environmental performance on EPL 7352 up to April, 2022. The environmental audit report is prepared as per the requirements of the Environmental Impact Assessment (EIA) Regulations No. 30 of 2012 gazetted under the Environmental Management Act, (EMA), 2007, (Act No. 7 of 2007), and a condition of the Environmental Clearance Certificate (ECC) issued for works on the EPL.

The EPL is 7116.8473 ha in size, and it is granted for Base and Rare Metals and Precious Metals, as the prospective commodities. The locality map of EPL 7352 is shown in **Figure 1**.

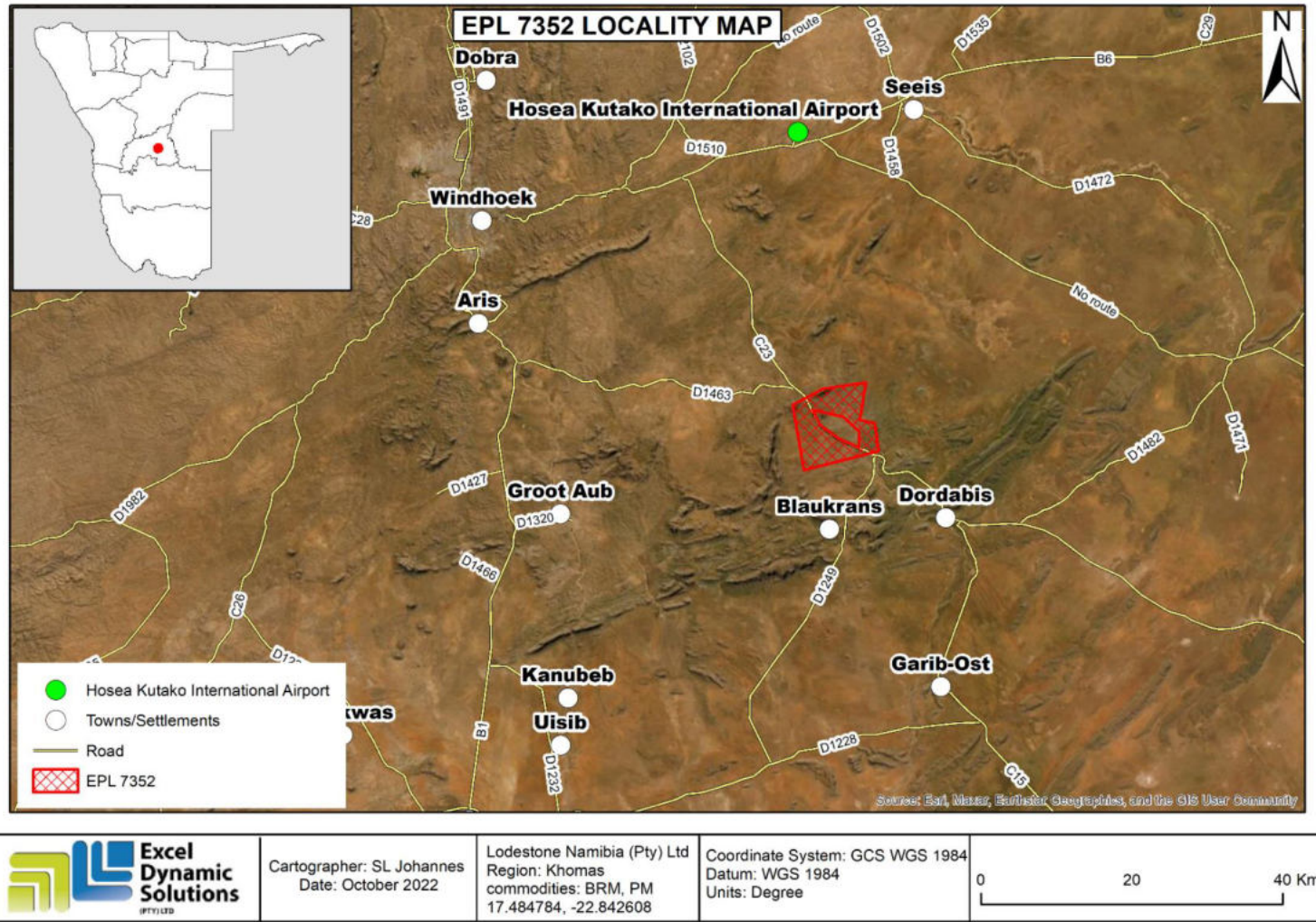


Figure 1: The Locality of EPL 7352

1.2 Purpose of the Environmental Compliance (Audit) Report

An Environmental Audit Report provides the link between the impacts identified in the EIA Process and the required environmental management on the ground during project implementation and operation, as assessed during compliance monitoring.

The compilation of this Environmental Audit Report is one of the requirements (scope of work) presented to EDS by Lodestone Namibia, to ensure environmental compliance with reference to the Environmental Management Plan (EMP), which has been prepared as a legal requirement by Section 8 of the Environmental Management Act (EMA), No.7 of 2007 and its 2012 Environmental Impact Assessment (EIA) Regulations.

This Environmental Audit Report serves to document the progress made on the prospecting and exploration works of EPL 7352. The phases of the proposed exploration activities are summarized below:

- **Operation and maintenance** - This is the phase during operation where the proponent carries out prospecting/exploration works and undertakes related activities on site. It is also the phase during which maintenance of the area, equipment and machinery is expected to be done by the Proponent.
- **Environmental Monitoring Requirements** - In order to support and ensure that the proposed mitigation measures are achieving the desired results, a monitoring plan must be implemented alongside the mitigation plan.
- **Decommissioning and Rehabilitation** – This is the phase during which the exploration activities cease. The decommissioning of the exploration operations occurs once exploration activities are completed, and may also be considered due to unfavourable exploration results or a decline in the target commodity market price. During the operational phase and before decommissioning, the Proponent will need to put site rehabilitation measures in place.

It is expected from Lodestone and their employees and/or contractors, in guiding them during the exploration work, to ensure that impacts on the environment are avoided or limited if they cannot be avoided completely.

1.3 Appointed Environmental Assessment Practitioner

Lodestone Namibia appointed Excel Dynamic Solutions (Pty) Ltd as the external Environmental Control Officer (ECO) to ensure EMP compliance, with the conditions of authorization, in performing environmental monitoring and auditing, in order to produce the environmental compliance report. This document was compiled by Ms. Rose Mtuleni, and reviewed by Mr. Nerson Tjelos.

2 EMP ROLES AND RESPONSIBILITIES

As the EPL holder, Lodestone Namibia is ultimately responsible for the implementation of the EMP, and has delegated the responsibility for the effective implementation of the EMP to Excel Dynamic Solutions (Pty) Ltd.

2.1 Environmental Management Action Plan and Audit

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. It is therefore important for the Proponent/Environmental Manager to be sure to adhere to the management actions.

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

- Phase 1: Operation (surveys, drilling, sampling...) (**Table 2**)
- Phase 2: Monitoring (**Table 3**)
- Phase 3: Decommissioning and Rehabilitation

The responsible persons at Lodestone Namibia should assess these commitments in detail and should acknowledge their commitment to the specific management actions detailed in the EMP. The compliance, thereof, is measured in **Tables 2 and 3**.

2.2 Key Potential Environmental Impacts to be managed

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

- Impacts on Biodiversity and Land (Clearing of Vegetation, Alien Invasive Plants, Wildlife and Livestock, Birds, Fire)
- Impact on Water Resources
- Generation of dust
- Generation of waste
- Visual impacts (scars) on landscape,
- Potential Impact on Surrounding Soils
- Vibrations and noise from exploration works
- Possible disturbance to heritage/archaeological resources
- Potential occupational health and safety risks,
- Vehicular traffic safety
- Impacts associate with closure and decommissioning of exploration works. (rehabilitation)

3 ENVIRONMENTAL AUDIT

3.1 Project Activity Summary and Compliance Audit

Detailed exploration activity on the EPL commenced in October 2020, with bulk sample drilling, which ended in November 2020. The bulk sample drilling entailed the drilling of eight (8) diamond core drill holes strategically placed to intersect the mineralised material within the Southern Ore Body which represent the first five (5) years of mining. The spatial distribution of the drill holes was planned in order to obtain a representative sample of the first five (5) years of life of mine. The 5-year mine model design was based on the exploration data obtained during the first four (4) drilling exploration phases and Resource Block model estimated in 2013 and updated in 2015.

The process basically included clearing and preparation of drill pads, siting of the drilling location, drilling and post site rehabilitation (**Figure 2**).

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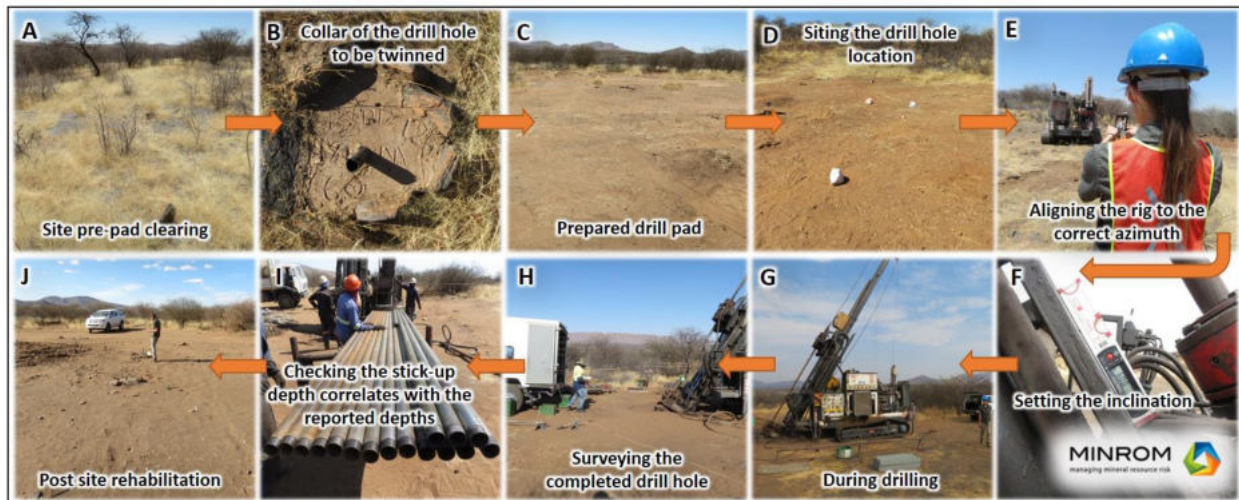


Figure 2: The drilling process - EPL 7352

Source: Minrom Consulting, 2022

After drilling, core is transported to the coreyard as set up by Proponent on Farm Tsatsachas, for logging. The storage area at the core shed consists of a level concrete pad with a corrugated iron roof and two (2) shipping containers (**Figure 3**).



Figure 3: Storage at the core yard and shipping containers

The current baseline is expected to be reviewed and progress inspected according to the EMP provided as part of the application for the ECC (ECC – 00422), rendering compliance report a requisite part of environmental monitoring on EPL 7352.

3.2. Phase 1: Operation Phase Management Action Plan

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

Table 3: Management Action Plan for the Operation Phase and EMP Audit

Environmental Feature	Management Actions	Observations	Compliance comment	Corrective Action/Recommendation
EMP training	<ul style="list-style-type: none"> Employees appointed for operation and maintenance on respective site must ensure that all personnel are aware of necessary health, safety and environmental considerations applicable to their respective works. 	Contractors working on the project have been informed of all the OHS&E issues	COMPLIANT	N/A
Monitoring	<ul style="list-style-type: none"> The ECO or the Proponent should monitor the implementation of this EMP. 	Undertaken on a weekly basis	COMPLIANT	N/A
	<ul style="list-style-type: none"> An EMP non-compliance penalty system should be implemented on site 	No general non-compliance penalty system in place for the exploration project.	PARTIALLY COMPLIANT	Implement a non-compliance penalty system based on the environmental features identified in the project's EMP, in order to ensure effectiveness of EMP mitigation measures for exploration works.

Environmental Feature	Management Actions	Observations	Compliance comment	Corrective Action/Recommendation
Visual Impacts (sense of place)	<ul style="list-style-type: none"> All the necessary options to improve the aesthetic of the site should be considered and incorporated in the activities of the prospecting and exploration program. 	The site is kept tidy and shows consideration of the natural aesthetic of the site, particularly preservation of surrounding vegetation	COMPLIANT	N/A
Biodiversity	<ul style="list-style-type: none"> Vegetation found on the site, but not in the targeted areas of exploration should not be removed, but left to preserve biodiversity on the site. 	No vegetation has been removed on the sites surrounding drilling sites.	COMPLIANT	N/A
	<ul style="list-style-type: none"> Shrubs, trees or grasses found along and around drilling and sampling areas on sites, should not be unnecessarily removed. Therefore, care should be taken when exploring for target mineral without destroying the vegetation. 	All staff are made aware.	COMPLIANT	N/A
	<ul style="list-style-type: none"> Workers should refrain from killing or snaring animals found on the site. 	All staff are made aware.	COMPLIANT	N/A

Environmental Feature	Management Actions	Observations	Compliance comment	Corrective Action/Recommendation
	<ul style="list-style-type: none"> Environmental awareness on the importance of biodiversity preservation should be provided to the workers 	This measure is not separately implemented, but addressed through the two measures above, on protection of animals and vegetation.	COMPLIANT	N/A
	<ul style="list-style-type: none"> Any identified alien invasive species may immediately be eradicated 	Workers will be made aware of the existence of alien invasive species, and trained to identify and eradicate them.	COMPLIANT	N/A
	<ul style="list-style-type: none"> When selecting drilling sites, avoid sites with large trees with raptors nests in them 	Sites with large trees are avoided, to protect and preserve vegetation and bird species.	COMPLIANT	N/A
Employment	<ul style="list-style-type: none"> Preference for casual and general labour during the operational phase should be given to the local residents the EPL. 	Local employment for general labour purposes is prioritised	COMPLIANT	N/A
	<ul style="list-style-type: none"> No recruitment should be done on site. 	No recruitment is done on site	COMPLIANT	N/A

Environmental Feature	Management Actions	Observations	Compliance comment	Corrective Action/Recommendation
Air Quality	<ul style="list-style-type: none"> Exploration schedule should be limited to weekdays, and between 08h00 and 17h00, or the times agreed upon between Proponent and land owners. This will keep the vehicle-related dust levels minimal in the area. 	The work hours are adhered to.	COMPLIANT	N/A
	<ul style="list-style-type: none"> Vehicles and machinery on site must be serviced regularly to prevent emission of harmful gases. 	Vehicles are regularly serviced	COMPLIANT	N/A
Waste Generation	<ul style="list-style-type: none"> Workers must be sensitised to responsible waste disposal methods. 	Waste is collected and removed from the site regularly.	COMPLIANT	N/A
	<ul style="list-style-type: none"> After each daily works, the Proponent must ensure that there is no waste left at the site of works. 	The site manager inspects the site for waste after works for the day are completed.	COMPLIANT	N/A
	<ul style="list-style-type: none"> All domestic and general operational waste produced on a daily basis must be contained until such that time it is transported to designated waste sites. 	Domestic/general waste is collected and contained on site until it can be disposed off.	COMPLIANT	N/A
	<ul style="list-style-type: none"> No waste may be buried or burned on site or anywhere else. 	No waste is burned on-site.	COMPLIANT	N/A

Environmental Feature	Management Actions	Observations	Compliance comment	Corrective Action/Recommendation
	<ul style="list-style-type: none"> The exploration site should be equipped with separate waste bins for hazardous, general/domestic and/or recyclable waste. 	<p>There is no hazardous waste used or generated on site.</p>	<p>COMPLIANT</p>	<p>N/A</p>
	<ul style="list-style-type: none"> A penalty system for irresponsible disposal of waste on site and anywhere in the area should implemented. 	<p>No general non-compliance penalty system in place for the exploration project. -Waste disposal methods are included in the induction and adhered to.</p>	<p>PARTIALLY COMPLIANT</p>	<p>Implement a non-compliance penalty system based on the environmental features identified in the project's EMP, in order to ensure effectiveness of EMP mitigation measures throughout exploration works.</p>
<p>Health and Safety</p>	<ul style="list-style-type: none"> As part of their induction, the workers should be provided with an awareness training of the risks of mishandling equipment and materials on site. 	<p>Implemented. Induction/Training is provided for all new recruits.</p>	<p>COMPLIANT</p>	<p>N/A</p>
	<ul style="list-style-type: none"> During operations on site, employees should be properly equipped with personal protective equipment (PPE) such as coveralls, gloves, safety boots, earplugs, safety glasses, hard hat etc. 	<p>The required PPE is provided to workers.</p>	<p>COMPLIANT</p>	<p>N/A</p>

Environmental Feature	Management Actions	Observations	Compliance comment	Corrective Action/Recommendation
	<ul style="list-style-type: none"> Workers should not be allowed to consume any intoxicants prior to and during working hours as this may lead to mishandling of equipment which results into injuries and other health and safety risks. 	Consumption of alcohol/intoxicants is prohibited on sites during working hours.	COMPLIANT	N/A
	<ul style="list-style-type: none"> Employees should not be allowed on site if under the influence of any intoxicants. 	Consumption of alcohol/intoxicants is prohibited on sites during working hours.	COMPLIANT	N/A
	<ul style="list-style-type: none"> No burning of waste must be allowed. Fire-fighting equipment must be available at all work stations. Potential flammable areas and structures should be marked as such with clearly visible signage 	No burning of waste on site Fire-fighting equipment must be available at all work stations	COMPLIANT	N/A
Noise	<ul style="list-style-type: none"> During exploration, the operational times must be set such that, no activity is carried out during the night or too early in the mornings. 	No activities are carried out during the early and late hours on the sites.	COMPLIANT	N/A

Environmental Feature	Management Actions	Observations	Compliance comment	Corrective Action/Recommendation
	<ul style="list-style-type: none"> Exploration hours should be restricted to between 08h00 and 17h00, or the hours agreed upon by the Proponent, to avoid noise generated by exploration equipment and the movement of vehicles before or after hours. 	<p>No activities are carried out during the early and late hours on the sites.</p>	<p>COMPLIANT</p>	<p>N/A</p>
	<ul style="list-style-type: none"> When operating the drilling machinery onsite, workers should be equipped with personal protective equipment (PPE) such as earplugs to reduce noise exposure 	<p>Workers are provided with the correct PPE required.</p>	<p>COMPLIANT</p>	<p>N/A</p>
<p>Soils</p>	<ul style="list-style-type: none"> Spill control preventative measures should be put in place to manage soil contamination, no matter how small the amount of pollution (spill) is. 	<p>There is no hazardous liquids/waste used on this site. Minor fuel/oil spills are attended to immediately.</p>	<p>COMPLIANT</p>	<p>N/A</p>
	<ul style="list-style-type: none"> Site soils should not be unnecessarily disturbed. 	<p>The exploration activity only occurs on the sites of interest on the EPL. Sites of interest are rehabilitated after completion of works</p>	<p>COMPLIANT</p>	<p>N/A</p>

Environmental Feature	Management Actions	Observations	Compliance comment	Corrective Action/Recommendation
	<ul style="list-style-type: none"> Overburden material should be handled efficiently during exploration operations to avoid erosion when subjected erosional processes. 	overburden was placed back on top of trench/pitting material	COMPLIANT	N/A
	<ul style="list-style-type: none"> Prevent the creation of huge piles of waste materials by performing sequential backfilling where possible 	Drillholes are Backfilled. The boreholes are capped after completion of works	COMPLIANT	N/A
Archaeology and cultural heritage	<ul style="list-style-type: none"> Caution should be exercised when carrying out excavations associated with the exploration activities in the event that archaeological/heritage remains are discovered. 	No sites of heritage/archaeological significance discovered on sites at this stage.	COMPLIANT	N/A
	<ul style="list-style-type: none"> The worksite/exploration manager should familiarise themselves with the National Heritage Council's regulations 	The Environmental Consultant will provide updates and information to the Project through EMP updates.	COMPLIANT	N/A
Communication	<ul style="list-style-type: none"> The Proponent should appoint a Public Relation Officer (PRO) to liaise with the farmers/landowners. 	Relationships with farmers/landowners established.	COMPLIANT	N/A

Environmental Feature	Management Actions	Observations	Compliance comment	Corrective Action/Recommendation
	<ul style="list-style-type: none"> The PRO should be introduced to the farm owners and his or her contact details provided to them prior to undertaking activities for easy communication during the exploration activities. 	Relationships with farmers/landowners established.	COMPLIANT	N/A
	<ul style="list-style-type: none"> The Proponent should compile a clear communication procedure/plan which should include a grievance mechanism 	Relationships with farmers/landowners established.	COMPLIANT	N/A
	<ul style="list-style-type: none"> The Proponent should enter into a written agreement with landowners before carrying out exploration on their land. 	Relationships with farmers/landowners established,	COMPLIANT	N/A
COVID-19	<ul style="list-style-type: none"> The workers should be engaged in health talks and training about the dangers of infections such as COVID-19. 	Included in Induction	COMPLIANT	N/A
	<ul style="list-style-type: none"> Provision of any available public health education information to workers. 	Included in induction	COMPLIANT	Provide COVID-19 information to workers, including information on sites for testing, vaccination etc.

3.2 Phase 2: Monitoring Phase Action Plan

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

Table 4: Monitoring Plan and EMP Audit

Environmental Feature	Management Actions/Monitoring Objectives	Frequency (Effective upon commencement of operations)	Observation	Compliance	Recommended Action
Soils	All measures should be considered to prevent the loss of top soil.	Weekly	Areas that are not part of the exploration/extraction process area remain undisturbed. Land clearing is limited. Backfilling of drill holes is carried out. Overburden is placed back on top of trench material	COMPLIANT	N/A
Monitoring	The ECO or the Proponent/Contractor should monitor the implementation of the EMP, in order to ensure compliance.	Daily	Regularly monitored EPL is audited by an Environmental Consultant.	COMPLIANT	N/A

Environmental Feature	Management Actions/Monitoring Objectives	Frequency (Effective upon commencement of operations)	Observation	Compliance	Recommended Action
	The ECO(s) should inspect the site throughout the exploration period and after completion.	Daily	Environmental audits occur and will continue until rehabilitation and closure phase of the exploration activities.	COMPLIANT	N/A
Biodiversity	Clear only minimal access tracks when necessary, to maintain as much of the remaining natural vegetation on site and to prevent habitat loss outside areas of interest for exploration.	Weekly	Minimal new tracks created on sites, to access sites for drilling.	COMPLIANT	N/A
	No equipment should be left leaning on or on top of shrubs or trees on site, during and after exploration work.	Weekly	At end of program all equipment and materials are removed from site.	COMPLIANT	N/A
Health and Safety	Exploration workers should be trained on how to properly handle materials and equipment on site (if they do not have the skills) in order to avoid injuries.	Daily/Weekly	.Material and equipment handling safety is included in Induction	COMPLIANT	N/A

Environmental Feature	Management Actions/Monitoring Objectives	Frequency (Effective upon commencement of operations)	Observation	Compliance	Recommended Action
	Exploration equipment and material transported to site should be securely fastened to the vehicles, to ensure that the material and equipment do not collapse and cause injury during transportation.	Daily/Weekly	Regularly monitored. Adhered to. Equipment is transported safely to and from the sites.	COMPLIANT	N/A
	The proponent and ECO/SHE Officer should ensure that all personnel are provided with appropriate personal protective equipment (PPE), such as gloves, safety boots, safety glasses and hard hats at all times during exploration (operation) hours on site to prevent injuries and/or loss of life.	Daily/Weekly	Appropriate PPE is provided to all workers. .	COMPLIANT	N/A

Environmental Feature	Management Actions/Monitoring Objectives	Frequency (Effective upon commencement of operations)	Observation	Compliance	Recommended Action
	No employee should be allowed to consume alcohol or any other intoxicants prior to and during working hours as this may lead to mishandling of equipment which may result into injury and/or other health and safety risks.	Daily/Weekly	Regularly monitored	COMPLIANT	N/A
Neighbours to the site	Exploration works schedule should be limited to normal working hours, between 08h00 and 17h00, or to the hours agreed upon between Proponent and landowners/residents. This is to ensure that noise generated during operation does not disturb residents.	Weekly	The working hours are adhered to.	COMPLIANT	N/A
Waste	The exploration site must be kept tidy at all times.	Daily	Regularly monitored and management procedures adhered to.	COMPLIANT	N/A

Environmental Feature	Management Actions/Monitoring Objectives	Frequency (Effective upon commencement of operations)	Observation	Compliance	Recommended Action
	All domestic and general construction waste produced on a daily basis must be collected and contained daily to prevent environmental pollution.	Daily	Regularly monitored and management procedures adhered to	COMPLIANT	N/A
	Avoid combining of hazardous and non-hazardous waste by providing separate waste containers (bins) for hazardous and domestic / general waste	Daily	Regularly monitored and management procedures adhered to	COMPLIANT	N/A
Transport	Exploration workers should be transported to and from site in a suitable passenger vehicle, preventing frequent exposure to high levels of dust.	Daily	Regularly monitored Management procedures adhered to	COMPLIANT	N/A
Vehicular traffic safety	All drivers of project vehicles must be in possession of valid and appropriate driving licenses to operate such vehicles.	Weekly	Regularly monitored Management procedures adhered to.	COMPLIANT	N/A

Environmental Feature	Management Actions/Monitoring Objectives	Frequency (Effective upon commencement of operations)	Observation	Compliance	Recommended Action
	Project vehicles should be in a road worthy condition and regularly serviced in order to prevent accidents as a result of mechanical faults.	Weekly	Service undertaken as and when necessary.	COMPLIANT	N/A
	Vehicle drivers should not be allowed to operate vehicles while under the influence of alcohol or any other intoxicants.	Weekly	Monitored Regularly	COMPLIANT	N/A
	No heavy trucks or project related vehicles should be parked next to the residents' properties or obstruct local traffic in any way.	Weekly	Regularly monitored. Adhered to.	COMPLIANT	N/A

SUMMARY OF COMPLIANCE

This environmental audit has identified 40 management actions and 18 monitoring actions. After observation, two (2) out of the 40 management actions have been identified as ***Partially-Compliant***. Thirty-eight (38) of the management actions were observed as ***Compliant***. All 18 monitoring actions were identified as ***Compliant***. The large proportion of *Compliant* action recorded for the environmental audit, therefore, renders the Proponent generally Compliant to the management and monitoring action plans for the project.

Lodestone Namibia have, thus far, paid attention to the environmental aspects and compliance of this project. There were no issues of Non-Compliance identified during this Environmental Audit.

This environmental audit has identified two issues of partial compliance, which may be regarded jointly as one issue, requiring a single solution/intervention. The identified issue has, thus far, had no significant negative effects to the exploration operations, the employees and the environment; and is, therefore, regarded as minor. The issue of Partial Compliance identified is:

1. There is no general non-compliance penalty system in place for the exploration project (including waste management actions)

Although, considered minor at this stage, an environmental management penalty system for the project will be relevant in the cases of observed irresponsible and/or unsustainable activity in the environment.

4 CONCLUSION AND RECOMMENDATIONS

The minor non/partial-compliances identified in this environmental audit report need corrective action in order for the operations of Lodestone Namibia (Pty) Ltd to reach a 100% Compliance rate. Recommendations for corrective action are as follows:

- Implement a penalty system for EMP Compliance to enforce accountability towards environmental management within exploration operations.

The potential positive and negative impacts of the exploration activities were identified, assessed and mitigation measures made thereof. Mitigation measures need to be adhered to at all times. Most importantly, monitoring of the environmental components described in the Environmental Management Plan must be conducted by the Proponent and an appointed Environmental Officer or any applicable Competent Authority.

The next site inspection will be undertaken in May/June 2023, and a resultant biannual report will be produced thereafter.