



ECC-79-193-REP-38-A

**ENVIRONMENTAL COMPLIANCE REPORT**  
**EXPLORATION ACTIVITIES ON MDRL 3287, ERONGO REGION, NAMIBIA**

**ENVIRONMENTAL CLEARANCE CERTIFICATE - RENEWAL APPLICATION**

*PREPARED FOR*  
ELEVATE URANIUM (PTY) LIMITED



**November 2021**

## TITLE AND APPROVAL PAGE

<b>Project Name:</b>	Environmental compliance report for the exploration activities on MDRL 3287, in the Erongo Region, Namibia.
<b>Project Number</b>	ECC-79-193-REP-38-A
<b>Client Name:</b>	Marenica Minerals (Pty) Ltd - Elevate Uranium Limited
<b>Ministry Reference:</b>	APP - 003393
<b>Status of Report:</b>	NA
<b>Date of issue:</b>	November 2021
<b>Review Period</b>	NA

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**DEFINITIONS AND ABBREVIATIONS**

ECC	Environmental Compliance Consultancy
EMA	Environmental Management Act
EMP	Environmental Management Plan
MDRL	Mineral Deposit Retention Licence
MEFT	Ministry of Environment, Forestry and Tourism

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# 1 INTRODUCTION

## 1.1 PROJECT INTRODUCTION

Elevate Uranium Limited, previously known as Marenica Energy Limited changed its name in June 2021. The parent company Elevate Uranium is an Australian Securities Exchange Listed Company. The MDRL is owned Marenica Minerals which is a consortium comprising Marenica Energy Ltd (75%), Xanthos Mining (Pty) Ltd (20%) and Millenium Minerals (Pty) Ltd (5%). Xanthos Mining (Pty) Ltd and Millenium Minerals (Pty) Ltd are both Namibian registered companies, which holds the Mineral Deposit Retention Licence 3287 (MDRL 3287).

Marenica Minerals (Pty) Ltd (herein referred to as the proponent), is seeking to continue with exploration opportunities and activities on MDRL 3287. The proponent holds a current and valid environmental clearance certificate for exploration activities on MDRL 3287, for which a renewal is being applied. As part of this application, an environmental compliance review has been undertaken to determine the status of compliance with the Environmental Management Plan. MDRL 3287 is located 8km west of Klein Spitzkoppe.

In terms of the Environmental Management Act, No. 7 of 2007, a renewal application for the EPL's environmental clearance certificate is required. As part of this application an environmental compliance review of the work undertaken on site and status of compliance with the Environmental Management Plan (EMP) is to be submitted to the competent authority, Ministry of Environment, Forestry and Tourism (MEFT).



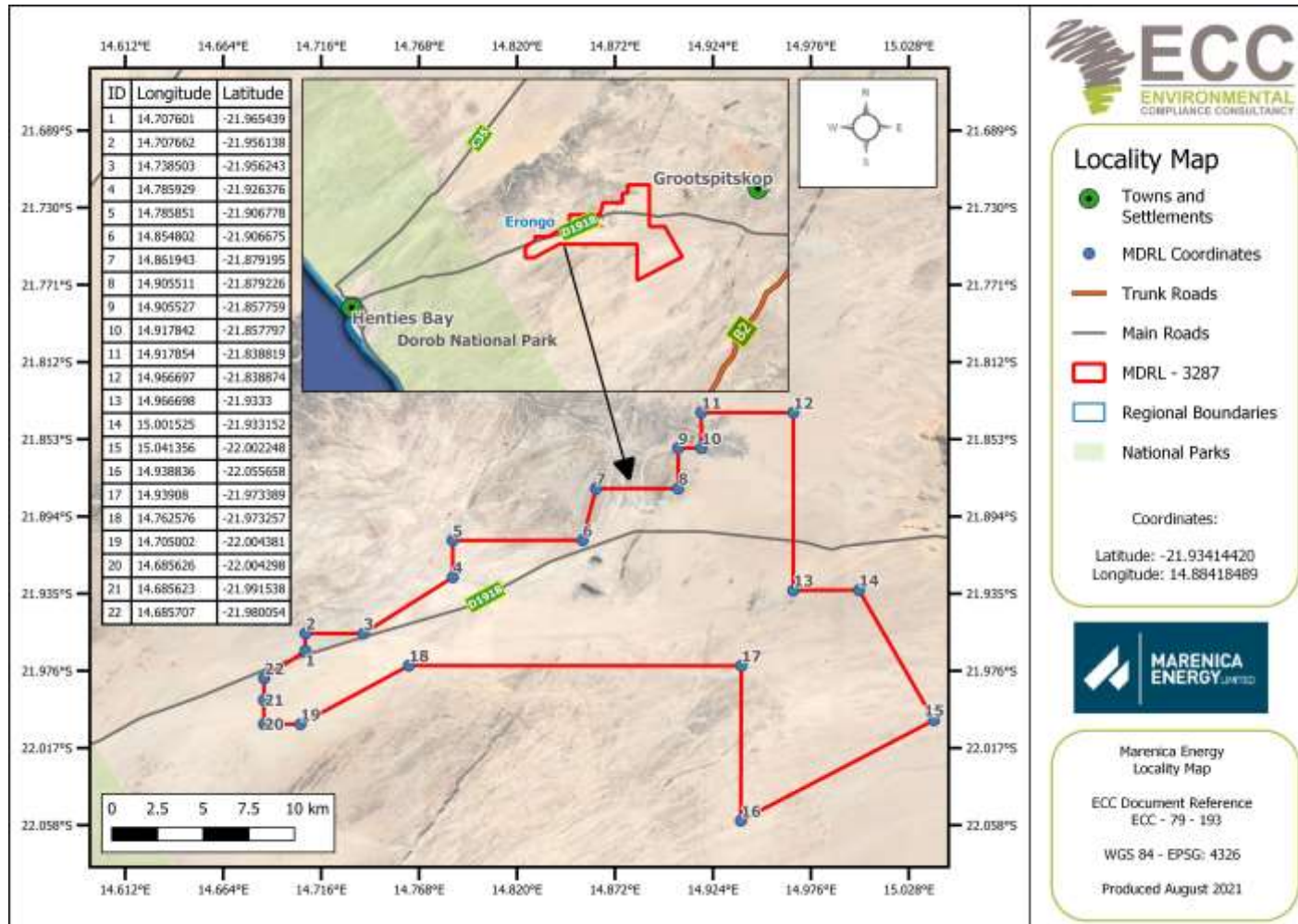


FIGURE 1 – LOCALITY MAP OF MDRL 3287

## 1.2 THE PROPONENT OF THE PROJECT

The details of the proponent are set out in Table 1.

**TABLE 1 - PROPONENTS DETAILS**

CONTACT	POSTAL ADDRESS	EMAIL ADDRESS	TELEPHONE
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## 1.3 ENVIRONMENTAL CONSULTANCY

Environmental Compliance Consultancy (ECC) is a Namibian registered consultancy and environmental practitioner, registration number CC/2013/11401. ECC has prepared this document on behalf of the proponent. ECC operates exclusively in the environmental, social, health and safety fields for clients across Southern Africa in the public and private sector. The curriculum vitae of the authors of this report are contained in Appendix B. ECC is independent of the proponent and has no vested or financial interests in the proposed project except for fair remuneration for professional services rendered.

All compliance and regulatory requirements regarding this document should be forwarded by email or posted to the following address:

**Environmental Compliance Consultancy**

PO BOX 91193

Klein Windhoek, Namibia

Tel: +264 81 669 7608

Email: [info@eccenvironmental.com](mailto:info@eccenvironmental.com)

## 1.4 PURPOSE OF REPORT

The purpose of this report is to document the findings of an environmental compliance audit, which accompanies the renewal application for the environmental clearance certificate for MDRL 3287.

This compliance report is subjected to periodical auditing as the project's exploration activities progress. The approved EMP for the existing environmental clearance certificate is audited in order to monitor the proceeds of the project and ensure that all measures stipulated in the document are met and effectively adhered to, as required by the Department of Environmental Affairs (DEA). In an event where the project activities are altered, the EMP is required to be revised and amended accordingly.

As per the Environmental Management Act, No. 7 of 2007 and its EIA Regulations of 2012, exploration activities on MDRL 3287 cannot be undertaken without a valid environmental clearance certificate. The exploration activities at MDRL 3287 proposes to assess the viability nuclear fuel minerals that can be found in the MDRL 3287 area. The proposed methods of exploration will have minimal impacts, as they are done on a small scale and rehabilitation of the natural vegetation will be done as per the approved EMP.

## 2 BACKGROUND TO MDRL 3287

This section provides a brief history of the exploration licence MDRL 3287, to provide context of the granting of the MDRL, the consenting of the environmental clearance certificate, and works undertaken to date on the MDRL site.

Since acquiring the EPL 3287 Marenica Project in 2006, the Company has conducted extensive exploration and resource drilling to establish the current resource inventory and completed studies. The Company has also completed extensive metallurgical testwork and developed a proprietary **U-pgrade™** process which significantly lowers the operating cost compared to conventional processing.

The final outcome of the resource estimate and 2017 Study were that with the low resource grade found and high-cost structure, a U<sub>3</sub>O<sub>8</sub> price of >US\$100/lb would be required for development using conventional processing technology.

### Metallurgical Developments

Elevate Uranium developed the **U-pgrade™** metallurgical beneficiation process to lower the cost base for development of calcrete hosted ores. **U-pgrade™** has the potential to achieve some outstanding results on the low-grade Marenica ore.

Application of the **U-pgrade™** process has provided an opportunity for development of the Marenica Uranium Project with a rise in U<sub>3</sub>O<sub>8</sub> price.

The **U-pgrade™** process is applicable to all calcrete hosted ores in Namibia and has provided Elevate Uranium with the catalyst to explore for calcrete hosted ores of higher grade than the Marenica Project. Elevate Uranium has explored on the EPL's it holds, in the last financial year alone, Elevate Uranium has spent NAD 12,793,850 on the exploration for Nuclear Fuels in Namibia.

Elevate Uranium are targeting application of the **U-pgrade™** process to higher grade projects in Namibia over the coming years. Elevate Uranium has estimated the following costs for a 300ppm U<sub>3</sub>O<sub>8</sub> calcrete ore producing 2Mlb/a of U<sub>3</sub>O<sub>8</sub>.

The application to transfer the EPL licence into an MDRL was granted in 2019. Ongoing exploration activities have since then taken place when the first environmental clearance certificate was issued.

For the exploration activities that took place between the period of (2019-2022), an environmental clearance certificate was granted on the 31 January 2019 and is valid until the 30 January 2022.



## 2.1 PROPOSED RENEWAL AND ACTIVITIES

The proposed activities once the environmental clearance certificate is renewed include:

- Geophysical surveys (airborne electromagnetic survey, ground HLEM surveys, etc);

## 3 ENVIRONMENTAL COMPLIANCE AUDIT

The Proponent like most of the mining industry in Namibia and Australia, the COVID-19 pandemic has had some impact on operations, although thankfully to date these have been relatively minor. The pandemic restricted exploration activities in Namibia for a short period of time during April and May 2020, and although the Erongo region of Namibia entered a second lockdown period in June 2020, mining and exploration were exempt and the proponent's exploration program continued. Due to restricted vehicle movements and reduced industry activity during this pandemic the airborne pollution in many countries has been reduced, and countries can now see the benefit of reduced pollution levels. This is likely to reinforce the value and benefits of reliable base load low carbon emission energy that is generated by nuclear.

The uranium prices for the reporting period remained below the trigger point, however the price fluctuated significantly due to the economic turmoil of the Covid pandemic. The year started on a low note with a price of USD 24/lb, with a peak at USD 34/lb, but it ended the year off at USD 27/lb, and as a result of the fluctuations, work on the ground remains dormant awaiting the first indications of a firm recovery in pricing. For this reasons no monitoring visits on site have been conducted.

### 3.1 ANNUAL COMPLIANCE AUDIT

The approved EMP covers all adverse environmental impacts, including any additional potential impacts that may result from the exploration activities at MDRL 3287. The EMP provides the technical details for each mitigation, monitoring and institutional measure, including the impact(s) to which it relates and the conditions when required, together with designs, equipment descriptions and operating procedures as granted.

TABLE 2 - EXPLORATION EMP AUDIT

ASPECT	MANAGEMENT OBJECTIVES	MANAGEMENT ACTIONS	COMPLIANCE	COMMENTS / RECOMMENDATIONS
<b>AIR QUALITY</b>  sampling use of roads and excavation	Increased dust levels and reduction in air quality. Affects safety, worker's health risk and visual impact to tourists.  1. Affects safety 2. Worker's health risk 3. Visual impact to tourists	Periodic wetting of the road surfaces using sea water, particularly in areas where a significant safety risk exists	<b>N/A no exploration taking place</b>	Nil
		Restriction of vehicles speeds on site.		
		Limiting disturbance to soils by remaining on existing tracks within the EPL, thereby maintaining the integrity of the soil surface,		
		The provision of personal protective equipment to all those employees potentially exposed to silica dust through the provision of adequate facemasks.		

ASPECT	MANAGEMENT OBJECTIVES	MANAGEMENT ACTIONS	COMPLIANCE	COMMENTS / RECOMMENDATIONS
<b>FLORA AND FAUNA</b>  sampling, use of roads and excavation / pits	Loss of flora and fauna	All attempts must be made to prevent its destruction, especially considering the sparse distribution of such vegetation as well as its slow growth.  No trenching activities will take place outside the boundaries of the EPL area and vegetated areas should be avoided as far as practically possible.	<b>N/A no exploration taking place</b>	Nil
		A. Established vegetation must not be destroyed during mineral deposit retention activities	<b>N/A no exploration taking place</b>	Nil
		B. Existing vehicle tracks must be used as far as practically possible	<b>N/A no exploration taking place</b>	Nil
		C. Staff awareness must be ensured so as to prevent the unwanted destruction of vegetation	<b>N/A no exploration taking place</b>	Nil
		D. Strictly disciplinary measures shall be applied to staff members caught poaching or attempting to trap wildlife	<b>N/A no exploration taking place</b>	Nil
		E. The prevention of litter and the adequate disposal of domestic wastes to prevent attracting pest	<b>N/A no exploration taking place</b>	Nil

ASPECT	MANAGEMENT OBJECTIVES	MANAGEMENT ACTIONS	COMPLIANCE	COMMENTS / RECOMMENDATIONS
		animals		
		G. The enforcement of speed restrictions on all roads / tracks to prevent accidents with animals	<b>N/A no exploration taking place</b>	Nil
		H. Rehabilitation as soon as possible, including careful rehabilitation of the topsoil to promote vegetation growth	<b>N/A no exploration taking place</b>	Nil
<b>LANDSCAPE AND TOPOGRAPHY</b>  Pits and excavation Stockpiling Tracks	Change of topography. Visual effects on tourist views and deterioration of landscape	A. The adequate control of dust generated within the sampling areas, including the access roads	<b>N/A no exploration taking place</b>	Nil
		B. Adequate disposal methods for all waste types, including domestic waste, scrap metal etc.	<b>N/A no exploration taking place</b>	Nil
		C. Reducing the visibility of structures, including water tanks, bulk fuel tanks etc.	<b>N/A no exploration taking place</b>	Nil
		D. Reducing the visibility of open trenches, pits, and stockpiles through ongoing rehabilitation	<b>N/A no exploration taking place</b>	Nil
		E. Limited or selected rehabilitation of present disturbed areas	<b>N/A no exploration taking place</b>	Nil

ASPECT	MANAGEMENT OBJECTIVES	MANAGEMENT ACTIONS	COMPLIANCE	COMMENTS / RECOMMENDATIONS
		F. Promotion of a culture of awareness amongst all employees involved with sensitivity of tourism to visual impacts as a result of activities in this area.	<b>N/A no exploration taking place</b>	Nil
		G. Rehabilitation as soon as possible	<b>N/A no exploration taking place</b>	Nil
<b>SOIL AND EROSION</b>  Movement of vehicles Earth moving	Disruption of surface micro-topography. Compaction and modification of the subsurface layers. Increased erosion potential of soils by wind erosion. Loss of seeds in the upper layer. Reduction in topsoil quality.	A. Prohibit use of vehicles off established and well-used tracks	<b>N/A no exploration taking place</b>	Nil
		B. Rehabilitate areas as soon as possible	<b>N/A no exploration taking place</b>	Nil
		C. Store topsoil and restore	<b>N/A no exploration taking place</b>	Nil

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## 4 REHABILITATION PLAN

All impacts caused by the proponent during exploration activities, will be rehabilitated should no further use of the land be required.

### 4.1 REHABILITATION ACTIVITIES

Rehabilitation measures include the following:

- Remove all construction equipment, surplus materials and temporary structures, fences and works of every kind;
- The sale/removal of all waste types from the project site to a recognized dump site;
- Break up bunds and all other concrete slabs (if applicable) and remove these, together with all waste concrete, to a recognized waste dump;
- Burn all uncontaminated, non-hazardous combustible substances (i.e. wood, cardboard, paper and food scraps) in a waste pit;
- Any other waste should be removed from site to an appropriate landfill facility (e.g. Henties Bay or Swakopmund);
- Oil spills should be cleaned up immediately. Contaminated soils should be disposed of at an approved disposal site (e.g. Walvis Bay);
- Bury all uncontaminated construction rubble (i.e. waste concrete) in a waste pit;
- Demolish buildings, if applicable;
- The surface of used roads should be broken up (scarified) to alleviate compaction and increase the rate of vegetation regeneration;
- Any sample pits or tracks that were previously created by the proponent and no longer used shall be rehabilitated as soon as possible and should not be left to the end of the exploration campaign;
- Whilst some historic tracks and sample pits were not created by the proponent, it would be best practice for the proponent to rehabilitate this legacy and improve the site conditions;
- New sample pits shall be rehabilitated once not envisaged to be used further through filling in the pits with overburden and covering with top soil;
- Once new tracks are no longer used, they shall be rehabilitated to avoid further soil erosion. This shall be undertaken immediately after use or concurrently with the exploration program;



- Once new trenches are no longer in use, they shall be rehabilitated through filling in the trenches with overburden and covering with top soil;
- The camp site shall be rehabilitated at the end of the exploration work, including the removal of the infrastructure and concrete slab, and historic hydrocarbon spills and waste shall be cleared from site; and
- All rehabilitation shall be undertaken in a manner so that the natural flow pattern of the landscape is not obscured.

#### 4.2 REHABILITATION MONITORING

To ensure rehabilitation is successful, the following shall be undertaken. Fixed photo points shall be established, and photos taken:

- Prior to any further exploration work are undertaken and thereafter periodically to visually assess rehabilitation processes over time; and
- At sites with previous activities and thereafter periodically to visually assess rehabilitation processes over time.

## **5 CONCLUSION AND RECOMMENDATIONS**

All proposed activities shall be carried out in compliance with the relevant requirements and conditions of the granted licence in accordance with the approved EMP. It is recommended that the proponent continue to adhere to all environmental legislation and company standards to ensure that best practical environmental protection continues as the project activities progress.

## APPENDIX A: ENVIRONMENTAL CLEARANCE CERTIFICATE



REPUBLIC OF NAMIBIA

### MINISTRY OF ENVIRONMENT AND TOURISM

Tel: (00 26481) 204 2111  
Fax: (00 26481) 332 057

Cnr Robert Mugabe &  
Dr Kenneth Kaunda Street  
Private Bag 13308  
Windhoek  
Namibia

Enquiries: Mr. Josafat K Hiwana  
E-mail: [josafat.hiwana@met.gov.na](mailto:josafat.hiwana@met.gov.na)

29 January 2019

#### OFFICE OF THE ENVIRONMENTAL COMMISSIONER

The Managing Director  
Marenica Minerals (Pty) Ltd  
P.O. Box 332  
Usakos  
Namibia

Dear Sir/Madam

**SUBJECT: ENVIRONMENTAL CLEARANCE CERTIFICATE FOR MINERAL DEPOSIT RETENTION LICENCE (MDRL) 3287 SITUATED IN HENTIES BAY DISTRICT, ERONGO REGION**

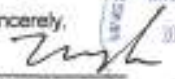
The Environmental Management Plan submitted is sufficient as it made provisions of the environmental management concerning the proposed activities. From this perspective, regular environmental monitoring and evaluations on environmental performance should be conducted. Targets for improvements should be established and monitored throughout this process.

This Ministry reserves the right to attach further legislative and regulatory conditions during the operational phase of the project. From this perspective, I issue the environmental clearance certificate with the following condition; that the key recommendations in the Environmental Management Plan shall be followed.

On the basis of the above, this letter serves as an environmental clearance certificate for the project to continue. However, this clearance letter does not in any way hold the Ministry of Environment and Tourism accountable for any misleading information, nor any adverse effects that may arise from this project's activities. Instead, full accountability rests with Marenica Minerals (Pty) Ltd.

This environmental clearance is valid for a period of 3 (three) years, from the date of issue unless withdrawn by this office.

Yours sincerely,

  
Teofilus Nghibila  
ENVIRONMENTAL COMMISSIONER



**"Stop the poaching of our rhinos"**

All official correspondence must be addressed to the Permanent Secretary

## **APPENDIX B: CONSULTANT'S CV**



**ECC**  
ENVIRONMENTAL  
COMPLIANCE CONSULTANCY



ECC-76-193-REP-41-A

## ENVIRONMENTAL MANAGEMENT PLAN

EXPLORATION ACTIVITIES ON MDRL 3287, ERONGO REGION, NAMIBIA

PREPARED FOR  
ELEVATE URANIUM (PTY) LIMITED



NOVEMBER 2018

## TITLE AND APPROVAL PAGE

<b>Project Name:</b>	Exploration activities on MDRL 3287, in the Erongo Region, Namibia
<b>Project Number:</b>	ECC-76-193-REP-41-D
<b>Client Name:</b>	Marenica Minerals (Pty) Ltd - Elevate Uranium Limited
<b>Ministry Reference:</b>	APP - 003393
<b>Status of Report:</b>	Final for Government Submission
<b>Date of issue:</b>	October 2018 – updated November 2021
<b>Review Period</b>	NA

### Environmental Compliance Consultancy Contact Details:

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**DEFINITIONS AND ABBREVIATIONS**

EIA	Environmental Impact Assessment
EMA	Environmental Management Act
EMP	Environmental Management Plan
MDRL	Mineral Deposit Retention Licence
MET	Ministry of Environment and Tourism
MME	Ministry of Mines and Energy
PM	Project Manager

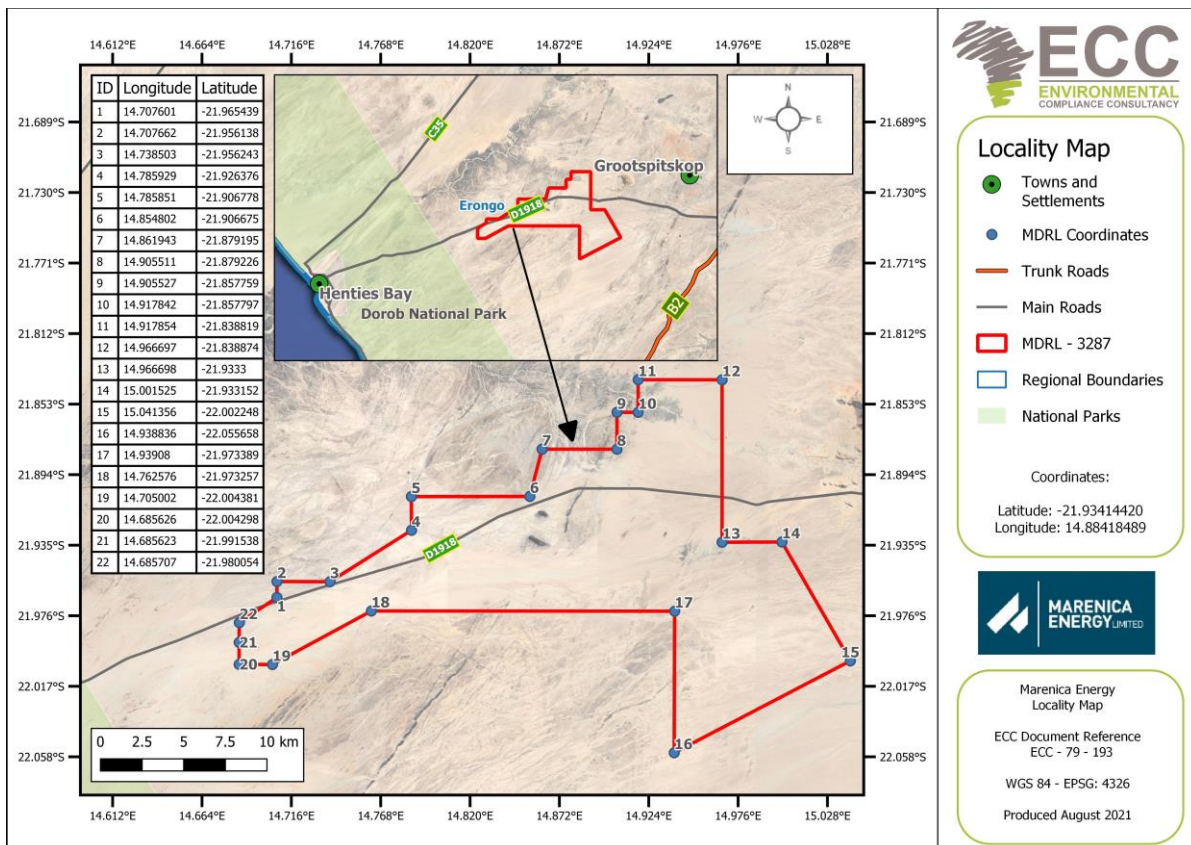
# 1. INTRODUCTION

## 1.1. PROJECT BACKGROUND

Elevate Uranium Limited, previously known as Marenica Energy Limited changed its name in June 2021. The parent company Elevate Uranium is an Australian Securities Exchange Listed Company that owns 100% of the Namibian Company Marenica Minerals (Pty) Ltd'. Marenica Minerals Namibia (Pty) Ltd is a wholly subsidiary of Elevate Uranium, which holds the Mineral Deposit Retention licence 3287 (MDRL 3287).

Marenica Minerals (Pty) Ltd (herein referred to as the proponent), holds a current and valid environmental clearance certificate for exploration activities on MDRL 3287, for which a renewal is being applied. The proponent has also developed a uranium concentration process that is unique and ground-breaking, lowering the extraction cost of uranium at the deposit, this process has various environmental benefits. This *U*-pgrade™ technology can be applied to surficial uranium deposits and is capable of concentrating uranium by a factor of up to 50 times, thereby reducing the feed to a leaching circuit dramatically.

The proponent is seeking to explore further uranium mining opportunities and proposes to undertake exploration activities on for base, rare and precious metals, nuclear fuel, and industrial minerals in the Erongo Region. MDRL 3287 is located 8km west of Klein Spitzkoppe. A locality map of the site is provided in Figure 1.



**FIGURE 1 - LOCALITY MAP OF MDRL 3287**

## 1.2. ENVIRONMENTAL REGULATORY REQUIREMENTS

The proposed project is considered as a listed activity as set out in the Environmental Management Act, No. 7 of 2007 and its Environmental Impact Assessment Regulation, No. 30 of 2012 (herein referred to as the EIA Regulations). A renewal application for an environmental clearance certificate is to be submitted. An Environmental Management Plan (EMP) is required to be submitted as part of the renewal process, as well as to support the decision-making process. This report presents the EMP and has been undertaken in accordance with the requirements of the Environmental Management Act, No. 7 of 2007 and associated Regulations.

## 1.3. PURPOSE AND SCOPE OF THIS REPORT

This EMP provides a logical framework, mitigation measures and management strategies for the exploration activities associated with the proposed project, in this way ensuring that the potential environmental and social impacts are mitigated and minimised as far as practically possible and that statutory and other legal obligations are adhered to and fulfilled. Outlined in the EMP are the protocols, procedures and roles and responsibilities to ensure the management arrangements are effectively and appropriately implemented.

This EMP forms an appendix to the environmental scoping report and has been based on the findings of the assessment; therefore, the environmental scoping report should be referred to for further information on the proposed project, assessment methodology, applicable legislation, and assessment findings.

This EMP is a live document and shall be reviewed at predetermined intervals, and or updated when the scope of works alters, or when further data / information can be added. All personnel working on the project will be legally required to comply with the standards set out in this EMP.

The scope of this EMP includes all activities carried out during the exploration stage in search of base, rare and precious metals, and industrial minerals on MDRL 3287 .

## 1.4. MANAGEMENT OF THIS EMP

The proponent will hold the environmental clearance certificate for the proposed project and shall be responsible for the implementation and management of this EMP. Prior to the exploration activities commencing, this EMP shall be reviewed, amended as required and approved ready for implementation. The implementation and management of this EMP and thus the monitoring of compliance shall be undertaken through daily duties and activities and monthly inspections.

This EMP shall be circulated to all contractors and shall be made available on the Environmental Compliance Consultancy's (ECC) website.

### 1.5. LIMITATIONS, UNCERTAINTIES AND ASSUMPTIONS OF THIS EMP

This EMP does not include measures for compliance with statutory occupational health and safety requirements. This will be provided in the safety management plan to be developed by the proponent.

Where there is any conflict between the provisions of this EMP and any contractor's obligations under their respective contracts, including statutory requirements (such as licences, project approval conditions, permits, standards, guidelines, and relevant laws), the contract and statutory requirements are to take precedence.

The information contained in this EMP has been based on the project description as provided in the environmental scoping report. Where the design or construction methods alter, this EMP may require updating and potential further assessment undertaken.

### 1.6. ENVIRONMENTAL CONSULTANCY AND ASSESSMENT PRACTITIONER

ECC, a Namibian consultancy registration number 2013/11401, has prepared this EMP on behalf of the proponent. ECC operates exclusively in the environmental, social, health and safety fields for clients across Southern Africa, in the public and private sector. ECC is independent to the proponent and has no vested or financial interest in the proposed project.

### 1.7. STRUCTURE OF THIS EMP

The report has the following structure:

- Chapter 1 – Introduction
- Chapter 2 – Project Management Personnel
- Chapter 3 – Communication and Training
- Chapter 4 – Compliance and Enforcement
- Chapter 5 – Environmental and Social Management
- Chapter 6 – Implementation of the EMP

## 2. PROJECT MANAGEMENT PERSONNEL

### 2.1. THE PROPONENT

The proponent shall provide a project team to oversee and undertake the preparation and exploration activities, which shall be composed of the proponent's personnel and contractors. A nominated role shall be identified to ensure the management and implementation of this EMP is throughout the duration of the project.

### 2.2. ORGANISATIONAL STRUCTURE, ROLES AND RESPONSIBILITIES

The proponent shall be responsible for:

- Ensuring all members of the project team, including contractors, comply with the procedures set out in this EMP;
- Ensuring that all persons are provided with sufficient training, supervision, and instruction to fulfil this requirement; and
- Ensuring that any persons allocated specific environmental responsibilities are notified of their appointment and confirm that their responsibilities are clearly understood

Contractors shall be responsible for ensuring and demonstrating that all personnel employed by them are compliant with this EMP, and meet the responsibilities listed above.

The key personnel and environmental responsibilities of each role through the project life are presented in **Error! Reference source not found..**

**TABLE 1 - KEY PERSONNEL AND THEIR RESPECTIVE RESPONSIBILITIES**

ROLE	RESPONSIBILITIES & DUTIES
Proponent	<ul style="list-style-type: none"> <li>- Responsible for the management and implementation of the EMP;</li> <li>- Ensure environmental policies is communicated to all personnel throughout the proposed project and that employees understand the guidelines of the EMP;</li> <li>- Responsible for providing the resources required to complete the project tasks;</li> <li>- Appoint a site manager and project Manager; and</li> <li>- Ensure all workers are inducted on safety measures.</li> </ul>
Project Manager (PM)	<ul style="list-style-type: none"> <li>- Overseeing exploration activities;</li> <li>- Monitoring daily operations and ensure adherence by personnel to the EMP;</li> <li>- Maintain the community issues and concerns register and keep records of complaints; and</li> <li>- Maintain an up-to-date register of employees who have completed site induction.</li> </ul>



ROLE	RESPONSIBILITIES & DUTIES
Site Manager	<ul style="list-style-type: none"> <li>- Ensuring that all contract workers, sub-contractors and visitors to the site are conversant with the requirements of this EMP, relevant to their roles on site and adhere to this EMP at all times;</li> <li>- Reporting any non-compliance or accidents to the PM;</li> <li>- Receiving, recording and responding to complaints;</li> <li>- Ensure adequate resources are available for the implementation of the EMP;</li> <li>- Report non-compliance to the PM;</li> <li>- Ensure safe and environmentally sound operations; and</li> <li>- Responsible for the management, maintenance, and revisions of this EMP.</li> </ul>
Employees	<ul style="list-style-type: none"> <li>- Adhere to measures set out in the EMP;</li> <li>- Ensure they have undertaken a site induction; and</li> <li>- Report any operations or conditions which deviate from the EMP as well as any non-compliant issues or accidents to the Environmental Manager</li> </ul>

### 2.3. CONTRACTORS

Any contractors hired during the exploration activities and accessory works for the project duration shall be compliant with this EMP, and shall be responsible for the following:

- Undertaking activities in accordance with this EMP as well as relevant policies, procedures, management plans, statutory requirements, and contract requirements;
- Implementing appropriate environmental and safety management measures;
- Reporting of environmental issues, including actual or potential environmental incidents and hazards, to the site manager and/or PM; and
- Ensuring appropriate corrective or remedial action is taken to address all environmental hazards and incidents reported by employees and subcontractors.

### 2.4. EMPLOYMENT

The proponent and all contractors shall comply with the requirements of the Republic of Namibia Regulations for labour, health and safety, and any amendments to these regulations. The following shall be complied with:

- In liaison with local government and community authorities the proponent shall ensure that local people have access to information about job opportunities and are considered first for construction / maintenance contract employment positions;
- The number of job opportunities shall be made known together with the associated skills and qualifications. The maximum length of time the job is likely to last for shall be clearly indicated;
- Foreign workers with no proof of permanent legal residence shall not be hired; and

- Every effort shall be made to recruit from the pool of unemployed workers living in the local area.

### 3. COMMUNICATION AND TRAINING

#### 3.1. COMMUNICATIONS

During exploration, the PM and site manager shall communicate site wide environmental issues to the Project Team through the following means (as and when required):

- Site induction;
- Audits and site inspections;
- Toolbox talks, including instruction on incident response procedures; and
- Key project specific environmental issues briefings.

This EMP shall be distributed to the exploration team including any contractors and personnel working on the exploration site to ensure that the environmental requirements are adequately communicated. Key activities and environmentally sensitive operations shall be briefed to workers and contractors.

During the exploration activities, communications between the management team shall include discussing any complaints received and actions to resolve them; any inspections, audits, or non-conformance with this EMP; and any objectives or target achievements.

#### 3.2. COMPLAINTS HANDLING AND RECORDING

Any complaints received verbally by any personnel on the project site shall be recorded by the receiver, including the name and contact details of the complainant, date and time of the complaint, and the nature of complaint. The information shall be given to the Project Manager who is overall responsible for the management of complaints and will provide a written response to the complainant. The PM shall inform the site manager of issues, concerns, or complaints. It is the duty of the Project Manager to maintain a complaint register that details the name of the complainant, date and time of complaint, action taken to resolve the issues and date of complaint handover.

The workforce shall be informed about the complaints register, its location and the person responsible, in order to refer local residents or the general public who wish to lodge a complaint. The complainant shall be informed in writing of the results of the investigation and action to be taken to rectify or address the matter(s). Where no action is taken, the reasons why are to be recorded in the register.

The complaints register shall be kept for the duration of the project and will be available for government or public review upon request.

### 3.3. TRAINING AND AWARENESS

All personnel working on the project shall be competent to perform tasks that have the potential to cause an environmental impact. Competence is defined in terms of appropriate education, training, and experience.

#### 3.3.1. SITE INDUCTION

All personnel involved in the project shall be inducted to the site with specific environment and social awareness training, and health and safety issues. The environment and social awareness training shall ensure that personnel are familiar with the principles of this EMP, the environment and social aspects and impacts associated with their activities, the procedures in place to control these impacts and the consequences of departure from these procedures.

The PM shall ensure a register of completed training is maintained.

The Site Induction should include, but not limited to the following:

- A general site-specific induction that outlines:
  - o What is meant by “environment” and “social”;
  - o Why the environment needs to be protected and conserved;
  - o How exploration activities can impact on the environment; and
  - o What can be done to mitigate against such impacts;
- The inductee’s role and responsibilities with respect to implementing the EMP;
- The sites environmental rules;
- Details of how to deal with, and who to contact if environmental problems should they occur;
- Basic vegetation clearing principals and species ID sheets;
- The potential consequences of non-compliance with this EMP and relevant statutory requirements; and
- The role of responsible people for the project.

## 4. REPORTING, COMPLIANCE AND ENFORCEMENT

### 4.1. ENVIRONMENTAL PERFORMANCE MEASUREMENT

#### 4.1.1. SUMMARY OF ENVIRONMENTAL RISKS AND MITIGATION MEASURES

Chapter 5 provides a register of environmental risks and issues, which identifies mitigation and monitoring measures, as well as roles responsible. This register will be subject to regular review by the PM and updated when necessary.

The PM and site manager will use this register to undertake monthly inspections (see next section) to ensure the project is compliant with this EMP.

#### 4.1.2. COMPLIANCE MONITORING

A copy of this EMP shall be on site throughout the exploration works and shall be available upon request. It is the responsibility of the PM and site manager to ensure this EMP is complied with through their daily roles. Daily inspections will be undertaken by the site manager (or nominated site supervisor). Any environmental problems or risks identified shall be notified to the PM and actioned as soon as is reasonably practicable.

##### 4.1.1.1. MONTHLY COMPLIANCE MONITORING

Monthly internal inspections during exploration activities shall be undertaken by the site manager to check that the standards and procedures set out in this EMP are being complied with and pollution control measures are in place and working correctly. Any non-conformance shall be recorded, including the following details: brief description of non-conformance; the reason for the non-conformance; the responsible party; the result (consequence); and the corrective action taken and any necessary follow up measures required.

### 4.2. REPORTING

Annual Reports shall be submitted to the Mining Commissioner. The reporting requirements for the site are illustrated in TABLE .

**TABLE 2 - REPORTING FREQUENCY**

TYPE OF LICENCE	MONTHLY	QUARTERLY	ANNUALLY
MDRL	N/A	N/A	Yes

### 4.3. NON-COMPLIANCE

#### 4.3.1.1. NON-COMPLIANCE EVENT

Where it has been identified that works are not compliant with this EMP, the PM shall employ corrective actions so that the works return to being compliant as soon as possible. In instances where the requirements of the EMP are not upheld, a Non-Conformance and Corrective Action Notice shall be produced. The Notice shall be generated during the inspections and the PM shall be responsible for ensuring a corrective action plan is established and implemented to address the identified shortcoming.

A non-compliance event / situation, for example, is considered if:

- There is evidence of contravention of this EMP and associated indicators or objectives;
- The site manager and or contractor have failed to comply with corrective or other instructions issued by the Environmental Manager or qualified authority; or
- The site manager and or contractor fail to respond to complaints from the public.

Works shall be stopped in the event of a non-compliance, until corrective action(s) has been completed

#### 4.3.2. DISCIPLINARY ACTION

This EMP is a legally binding document and non-compliance with it shall result in disciplinary action being taken against the perpetrator/s. Such action may take the form of (but is not limited to):

- Fines / penalties;
- Legal action;
- Monetary penalties imposed by the proponent on the contractor;
- Withdrawal of license/s; and
- Suspension of work.

The disciplinary action shall be determined according to the nature and extend of the transgression / non-compliance, and penalties are to be weighed against the severity of the incident.

### 4.4. ENVIRONMENTAL PERMITS

Whilst the Water Resources Management Act, 2013 is not enforced, it is best practice to adhere to the stipulations. A licence to abstract and use water maybe required if boreholes are to be created, however this is unlikely.

Some vegetation shall be cleared on the project's site to allow exploration activities to commence. It is unlikely that an area greater than 15ha shall be cleared, therefore a permit under the Forest Act, 2001 is not required.

## 5. ENVIRONMENTAL AND SOCIAL MANAGEMENT

### 5.1. OBJECTIVES AND TARGETS

Environmental objectives for the project are as follows:

- Zero pollution incidents;
- Minimal vegetation clearing and earthworks
- Protect local flora and fauna; and
- Use natural resources effectively and efficiently.

### 5.2. REGISTER OF ENVIRONMENTAL RISKS AND ISSUES

An environmental review of the proposed project has been completed to identify all the commitments and agreements made within the environmental scoping report. From this, a schedule of environmental commitments and risks has been produced, which details deliverables including measures identified for the prevention of pollution or damage to the environment during exploration.

**TABLE 3 – ENVIRONMENTAL RISKS AND ISSUES, AND MITIGATION AND MONITORING MEASURES**

ACTIVITY	POTENTIAL IMPACTS	MANAGEMENT/MITIGATION MEASURES	MONITORING REQUIREMENTS	RESPONSIBILITY
Use of Plant and equipment (on the ground)	– Safety	<ul style="list-style-type: none"> <li>– Plant and equipment shall be brought onto site as and when required and stored in specific areas.</li> <li>– Amenities (e.g., portable toilets) shall be provided and set up in a suitable location (if required).</li> </ul>	– Daily observations	<ul style="list-style-type: none"> <li>– Project Manager</li> <li>– Site Manager</li> </ul>
	– Aerial emissions	<ul style="list-style-type: none"> <li>– All plant to be shut down or throttled back between periods of use.</li> </ul>	– Daily observations	<ul style="list-style-type: none"> <li>– Project Manager</li> <li>– Site Manager</li> </ul>
	– Potential loss of oil and fuel causing ground contamination	<ul style="list-style-type: none"> <li>– Refueling shall be undertaken in a designated area.</li> <li>– All stationary vehicles and machinery must have drip trays to collect leakages of lubricants and oil</li> <li>– In the event of pollution, polluted soils must be collected and dumped at an approved site</li> </ul>	– Daily observations	<ul style="list-style-type: none"> <li>– Project Manager</li> <li>– Site Manager</li> </ul>
	– Water contamination	<ul style="list-style-type: none"> <li>– Water during drilling should be retained in a lined pond to prevent pollution</li> <li>– A ‘good housekeeping’ policy shall be adopted across the construction and maintenance working areas.</li> </ul>	– Daily observations	<ul style="list-style-type: none"> <li>– Project Manager</li> <li>– Site Manager</li> </ul>
	– Dust generation	<ul style="list-style-type: none"> <li>– Use existing access roads and tracks where possible</li> <li>– Apply dust suppression method such as water spraying during drilling operations</li> <li>– Restricted speeds (&lt;30km/h)</li> <li>– Provide protective masks and eyeglasses to employees in dusty working environments</li> <li>– Specific activities that may generate dust shall be avoided during high wind events, e.g., soil preparation activities</li> </ul>	– Daily observations	<ul style="list-style-type: none"> <li>– Project Manager</li> <li>– Site Manager</li> </ul>
	– Noise generation	<ul style="list-style-type: none"> <li>– Noise shall be minimized as much as possible during construction works.</li> <li>– Limit working hours to 7am to 6pm weekdays and 7am until 1pm on Saturday.</li> </ul>	– Daily observations	<ul style="list-style-type: none"> <li>– Project Manager</li> <li>– Site Manager</li> </ul>



ACTIVITY	POTENTIAL IMPACTS	MANAGEMENT/MITIGATION MEASURES	MONITORING REQUIREMENTS	RESPONSIBILITY
		<ul style="list-style-type: none"> <li>- Inform local communities and residents of scheduling and duration of noisy activities through notices or face-to-face communications.</li> <li>- Regular maintenance and servicing of vehicles, plant, and equipment.</li> <li>- All plant to be shut down or throttled back between periods of use.</li> <li>- Provide earmuffs to employees working in close proximity to excessive noise</li> <li>- Workers must not be subjected to working in noise levels above the threshold of 85dB (A) for longer than 8 hours</li> </ul>		
Use of airborne equipment (remote sensing drone, helicopter)	- Noise generation	<ul style="list-style-type: none"> <li>- Only use remote sensing equipment between 7am and 5pm</li> <li>- No flying is to be conducted on Sundays and on public holidays</li> </ul>	- Daily observations	<ul style="list-style-type: none"> <li>- Project Manager</li> <li>- Site Manager</li> </ul>
Vegetation Clearance	- Alien species	<ul style="list-style-type: none"> <li>- Ensure the correct removal of alien invasive vegetation from the proposed development area and prevent the establishment and spread of alien invasive plants due to the development activities.</li> <li>- Ensure the potential introduction and spread of alien plants is prevented</li> <li>- All project or earth moving equipment must have an internal weed and seed inspection completed prior to equipment being used on site</li> <li>- Invasive plants shall be removed as per the National Park Management Strategy.</li> </ul>	<ul style="list-style-type: none"> <li>- Monitor daily the removal of the alien invasive vegetation.</li> <li>- Check the tyres of vehicles after use on site</li> </ul>	<ul style="list-style-type: none"> <li>- Employees</li> <li>- Project manager</li> </ul>
	- Dust generation	<ul style="list-style-type: none"> <li>- Apply speed restrictions</li> <li>- Avoid off road driving</li> </ul>	- Daily observations	<ul style="list-style-type: none"> <li>- Project Manager</li> <li>- Site Manager</li> </ul>
	- Reduced soil quality	<ul style="list-style-type: none"> <li>- Use existing tracks where possible.</li> <li>- Refueling to occur in designated areas with drip trays</li> <li>- Avoid natural drainage lines</li> </ul>	- Daily observations	<ul style="list-style-type: none"> <li>- Project Manager</li> <li>- Site Manager</li> </ul>
	- Injure or kill animals	<ul style="list-style-type: none"> <li>- Relocate slow moving reptiles and amphibians away from the construction area</li> </ul>	- Daily observations	<ul style="list-style-type: none"> <li>- Project Manager</li> <li>- Site Manager</li> </ul>

ACTIVITY	POTENTIAL IMPACTS	MANAGEMENT/MITIGATION MEASURES	MONITORING REQUIREMENTS	RESPONSIBILITY
		<ul style="list-style-type: none"> <li>- No driving off designated access routes (into the bush) / off-road driving</li> <li>- No snares or catching of animals for pets or food.</li> <li>- No animals or birds may be collected, caught, consumed, or removed from site by the contractor or personnel on site.</li> </ul>		
	<ul style="list-style-type: none"> <li>- Removal of vegetation – loss of flora and fauna, protected/important species</li> </ul>	<ul style="list-style-type: none"> <li>- Use existing tracks where possible.</li> <li>- Route new tracks around established and protected trees, and clumps of vegetation</li> <li>- Identify rare, endangered, threatened, and protected species. Demarcate and avoid cutting down, and clearly highlight to construction workers so that they are avoided</li> <li>- Avoid natural drainage lines</li> </ul>	<ul style="list-style-type: none"> <li>- Daily visual inspection during construction of new access tracks/widening</li> </ul>	<ul style="list-style-type: none"> <li>- Project Manager</li> <li>- Employees</li> <li>- Site Manager</li> </ul>
Site and ground Preparation – creation of access tracks and areas for setting up drill rigs	<ul style="list-style-type: none"> <li>- Creation of dust</li> </ul>	<ul style="list-style-type: none"> <li>- As above</li> </ul>	<ul style="list-style-type: none"> <li>- Daily observations</li> </ul>	<ul style="list-style-type: none"> <li>- Project Manager</li> <li>- Site Manager</li> </ul>
	<ul style="list-style-type: none"> <li>- Heritage remains</li> </ul>	<p>Discovery of unearthed archaeological remains to be uncovered, the following measures (chance find procedure) shall be applied:</p> <ul style="list-style-type: none"> <li>- Works to cease, area to be demarcated with appropriate tape by the site supervisor, and the Site Manager to be informed;</li> <li>- Site manager to visit the site and determine whether work can proceed without damage to findings, mark exclusions boundary and inform the Environment and Social Manager with the GPS position if possible;</li> <li>- If works cannot proceed without damage to findings, site manager to inform the Environmental Manager who will get in touch with an archaeologist who will provide advise;</li> <li>- Environment Manager (ECC) / Archaeological Specialist to evaluate the significance of the remains and identify appropriate action, for example, record and remove; relocate or leave in situ (depending on</li> </ul>	<ul style="list-style-type: none"> <li>- Daily observations</li> </ul>	<ul style="list-style-type: none"> <li>- Project Manager</li> <li>- Site Manager</li> </ul>

ACTIVITY	POTENTIAL IMPACTS	MANAGEMENT/MITIGATION MEASURES	MONITORING REQUIREMENTS	RESPONSIBILITY
		<p>the nature and value of the remains);</p> <ul style="list-style-type: none"> <li>- Inform the police if the remains are human; and</li> <li>- Obtain appropriate clearance or approval from the competent authority, if required, and recover and remove the remains to the National Museum or National Forensic Laboratory as direct.</li> </ul>		
Fuel handling and storage	<ul style="list-style-type: none"> <li>- Loss of containment leading to ground or groundwater contamination .</li> </ul>	<p><b><u>Safe delivery and handling:</u></b></p> <ul style="list-style-type: none"> <li>- Training employees and Toolbox Talks.</li> <li>- Good housekeeping across site.</li> <li>- Fuel is handled with care</li> <li>- Spill kits to be at designated areas across site or available for use during refueling, fuel delivery or use. Absorption material should be available and at hand. Where saw dust is used it should be cleaned up immediately and not left for long periods as this poses a fire hazard.</li> <li>- Any major spill is reported to the PM once containment has been achieved.</li> <li>- Plant and equipment to be well maintained and serviced regularly.</li> <li>- In the field, use of hydrocarbons under 200 liters can be used for mobile refueling or servicing.</li> </ul> <p><b><u>Storage:</u></b></p> <ul style="list-style-type: none"> <li>- All tanks to be stored on a non-porous floor and bunded area.</li> <li>- Bund to be capable of storing at least 110% of the volume of the tank</li> <li>- All containers to be suitable for use and not damaged.</li> <li>- Tanks are locked at all times</li> <li>- Spill kits available at storage locations and around site in suitable locations.</li> </ul> <p><b><u>Refueling</u></b></p> <ul style="list-style-type: none"> <li>- Drip tray to be used during refueling of vehicles and on a permeable</li> </ul>	<ul style="list-style-type: none"> <li>- Daily observations when fuels are delivered and handled</li> <li>- Supervision during refueling</li> <li>- Weekly observations monitor containment and storage</li> </ul>	<ul style="list-style-type: none"> <li>- Project Manager</li> </ul>

ACTIVITY	POTENTIAL IMPACTS	MANAGEMENT/MITIGATION MEASURES	MONITORING REQUIREMENTS	RESPONSIBILITY
		flat surface where possible. – Funnel should be available and used to avoid spillage during decanting		
Generation of waste	– Nuisances (odors and visual) – Land use – Litter (nuisance and ecological risk)	– Training and toolbox talks. – Good housekeeping across site. – All working areas shall apply good housekeeping. – Implement the waste management hierarchy across site: Avoid, reuse, recycle, then disposal through burning or dump. – Waste shall be collected and shall be removed on a regular basis to avoid pests and bad odours – It is unlikely that hazardous material and wastes will be produced, however in the event that they do, they shall be managed in a safe and responsible manner so as to prevent contamination of soils, pollution of water and/or harm to people or animals as a result of the use of these materials. Hazardous and non-hazardous waste shall be stored separately at all times.	– Daily observations – Weekly checks	– Project Manager – Employees
Resource use	– Inefficient use of water	– Use water effectively and efficiently – Recycle, treat and reuse	– Daily observations	– Project Manager – Employees
Job creation	– Employment creation and skills development opportunities during the exploration phase.	– Maximise local employment and local business opportunities to promote and improve the local economy. – Enhance the use of local labour and local skills as far as reasonably possible. Where the required skills do not occur locally, and where appropriate and applicable, ensure that relevant local individuals are trained. – Ensure that goods and services are sourced from the local and regional economy as far as reasonably possible.	– Daily observations – Weekly checks	– Project Manager – Employees

## 6. REHABILITATION PLAN

Due to the sensitive ecology of the area, as well as the fact that it is in a national park, which makes it sensitive for both biodiversity and tourism as a land use to visual impacts rehabilitation measures applied after prospecting activities is essential. All impacts caused by the proponent during exploration activities, must be rehabilitated should no further use of the land be required.

### 6.1. REHABILITATION ACTIVITIES

Rehabilitation measures include the following:

- Remove all construction equipment, surplus materials and temporary structures, fences and works of every kind;
- The sale/removal of all waste types from the project site to a recognized dump site;
- Break up bunds and all other concrete slabs (if applicable) and remove these, together with all waste concrete, to a recognized waste dump;
- Burn all uncontaminated, non-hazardous combustible substances (i.e. wood, cardboard, paper and food scraps) in a waste pit;
- Any other waste should be removed from site to an appropriate landfill facility (e.g. Henties Bay or Swakopmund);
- Oil spills should be cleaned up immediately. Contaminated soils should be disposed of at an approved disposal site (e.g. Walvis Bay);
- Bury all uncontaminated construction rubble (i.e. waste concrete) in a waste pit;
- Demolish buildings, if applicable;
- The surface of used roads should be broken up (scarified) to alleviate compaction and increase the rate of vegetation regeneration;
- Any sample pits or tracks that were previously created by the proponent and no longer used shall be rehabilitated as soon as possible and should not be left to the end of the exploration campaign;
- Whilst some historic tracks and sample pits were not created by the proponent, it would be best practice for the proponent to rehabilitate this legacy and improve the site conditions;
- New sample pits shall be rehabilitated once not envisaged to be used further through filling in the pits with overburden and covering with top soil;
- Once new tracks are no longer used, they shall be rehabilitated to avoid further soil erosion. This shall be undertaken immediately after use or concurrently with the exploration program;

- Once new trenches are no longer in use, they shall be rehabilitated through filling in the trenches with overburden and covering with top soil;
- The camp site shall be rehabilitated at the end of the exploration work, including the removal of the infrastructure and concrete slab, and historic hydrocarbon spills and waste shall be cleared from site; and
- All rehabilitation shall be undertaken in a manner so that the natural flow pattern of the landscape is not obscured.

With regard to trenches, stockpiles, and waste dumps, it is recognized that once the overburden has been removed, a 30% swell factor of the overburden is anticipated. It will therefore be necessary to find alternative uses and permanent stockpiling points for the material, that cannot be accommodated in the trenches when backfilling during rehabilitation. Furthermore, it is vitally important that the shallow topsoil layer is conserved during prospecting activities. Soils in arid areas store seeds in the upper layers for extended periods of time until the germination conditions of seeds are met. These seeds will be very valuable to the rehabilitation process, as they will provide a source of plant material. Separate stripping of differentiated soil layers will therefore be necessary for rehabilitation.

The following rehabilitation measures are therefore required for trenches, pits and waste dumps:

- Used pits and trenches must be backfilled, compacted marginally (to prevent slumping) and contoured to follow the natural contours of the land; and
- Where topsoil is available (containing the valuable seedbed), this topsoil should be spread evenly over areas requiring rehabilitation.
- When rehabilitation is complete there must be little or no evidence of the sampling activities, which have taken place in the area.

## 6.2. REHABILITATION MONITORING

To ensure rehabilitation is successful, the following shall be undertaken. Fixed photo points shall be established, and photos taken:

- Prior to any further exploration work are undertaken and thereafter periodically to visually assess rehabilitation processes over time; and
- At sites with previous activities and thereafter periodically to visually assess rehabilitation processes over time.

## 7. IMPLEMENTATION OF THE EMP

This EMP:

- A. Has been prepared pursuant to a contract with the proponent;
- B. Has been prepared on the basis of information provided to ECC up to August 2018;
- C. Is for the sole use of the proponent, for the sole purpose of an EMP;
- D. Must not be used (1) by any person other than the proponent or (2) for a purpose other than an EMP; and
- E. Must not be copied without the prior written permission of ECC.

ECC has prepared the EMP on the basis of information provided by the proponent, specialist reports and the Environmental Scoping Report.