

ENVIRONMENTAL MANAGEMENT PLAN REPORT

**ENVIRONMENTAL SCOPING ASSESSMENT (ESA) FOR THE EXPLORATION OF INDUSTRIAL
MINERALS, PRECIOUS METALS, BASE AND RARE METALS MINERAL GROUPS ON EPL
NO.8100, LOCATED IN UIS DISTRICT, ERONGO REGION – NAMIBIA**

COMPILED BY




SS CONSULTANTS

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1. OVERVIEW

1.1 Project Background

The Ministry of Mines and Energy (MME) has granted the proponent an Exclusive Prospecting License (EPL) with the primary purpose of exploring industrial minerals, base and rare metals, and precious metals deposits. To proceed with the exploration activities, the proponent is required to obtain an Environmental Clearance Certificate (ECC) as mandated by the Environmental Management Act. As per the Environmental Management Act (EMA) (2007) and its 2012 Environmental Impact Assessment (EIA) Regulations, the proponent must conduct an Environmental Impact Assessment (EIA) to identify and evaluate all potential environmental impacts associated with the project. The extent of these impacts will inform the development of an effective Environmental Management Plan (EMP) that will facilitate the management of these impacts by implementing appropriate mitigation measures. The EMP outlines the proponent's approach to managing the exploration, potential mining, and processing operations within the EPL area, with a focus on minimizing negative effects and maximizing positive ones on the receiving environment. 8100 is located approximately 20 km south of Uis town, within Daures Constituency in the Erongo Region. Covering an approximate area of 13445.929 hectares of state land, the EPL can be accessed via the D1930 road from Uis, which passes through the middle of the EPL. The locality of the EPL is depicted **Error! Reference source not found..**

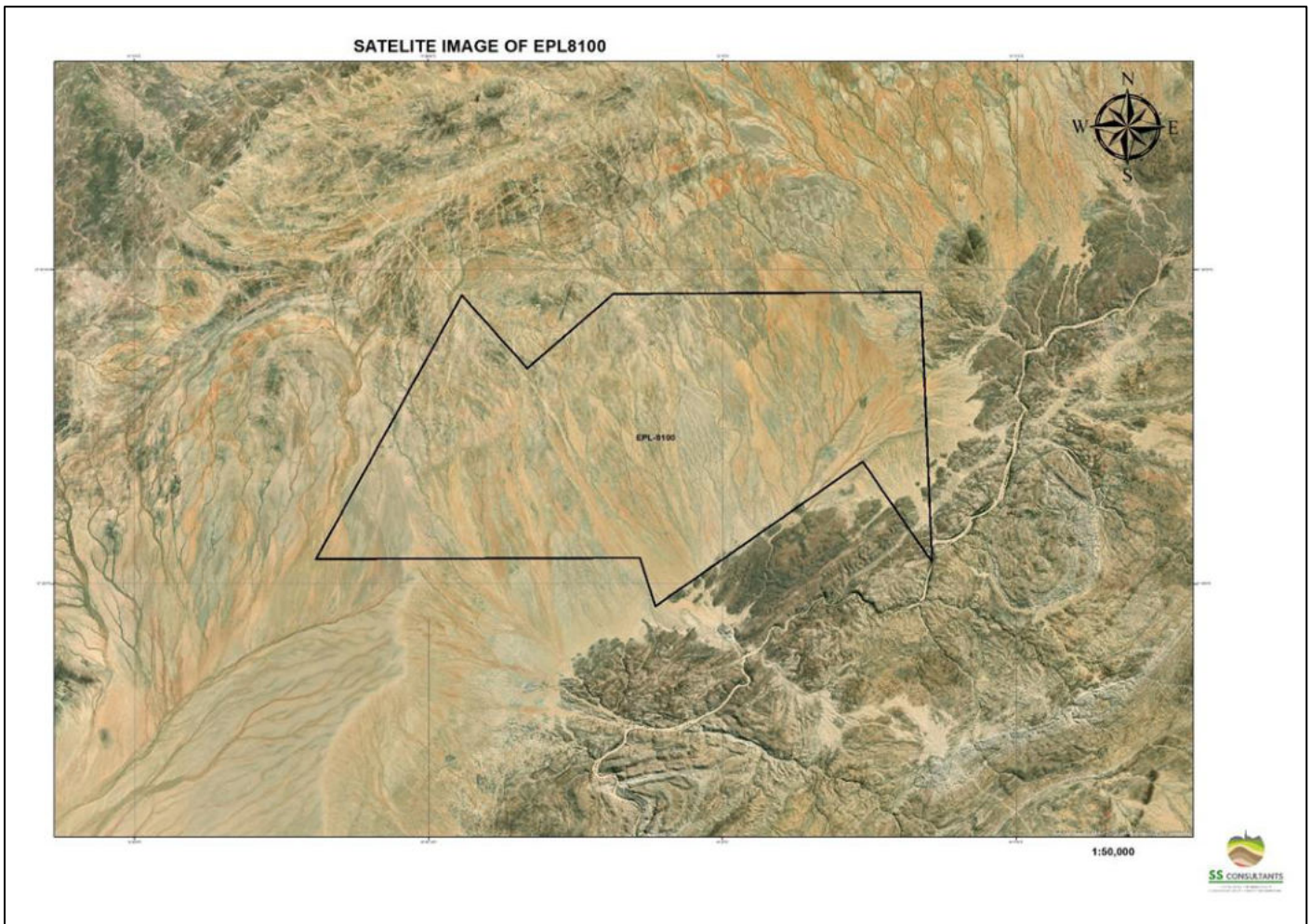


Figure 0-1: Locality Map for EPL 8100.

1.2. Purpose of the EMP

The Environmental Management Plan (EMP) serves as a comprehensive tool outlining specific actions necessary to implement mitigation measures for a proposed project. It is a legally binding document, and individuals who violate its provisions may face imprisonment or fines. The EMP aims to minimize negative impacts and maximize positive ones. It assigns roles and responsibilities for successful implementation of environmental management strategies by the proponent

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Including a draft of the EMP in the scoping Environmental Assessment (EA) process is mandatory. The identified risks and impacts from the Environmental Impact Assessment (EIA) are incorporated into the practical implementation of the EMP. Continuous management of the EMP should be maintained throughout the project's life to ensure effective responsiveness to any changes and positive monitoring results throughout the project's lifecycle.

The overall objectives of the EMP are as follows:

- Implement measures to avoid and minimize adverse impacts of the proposed project.
- Ensure compliance with regulatory authority stipulations and guidelines.
- Enhance the value of environmental components where feasible.
- Protect environmental resources such as biodiversity, ecosystems, natural resources, and social aspects.
- Respond to unforeseen events and provide feedback for continual improvement in environmental performance.

The following phases are addressed in this EMP:

- **Phase 1: Initial Desktop study and prospecting activities** – Before the exploration activities start, required legislative and administrative sorting must be carried out. This is done to prepare for the proposed exploration activities.
- **Operation** - the period during which the exploration activities will be operational.
- **Decommissioning** – This phase is implemented when the proposed development's lifetime ends.

1.3. Environmental Assessment Practitioner (EAP)

SS Consultants, an independent environmental consultant, was tasked by the proponent to conduct the required Environmental Assessment (EA) and prepare an Environmental Management Plan (EMP) for the proposed development. According to the Environmental Act of 2007, the EMP must be submitted to the Environmental Commissioner at the Department of Environmental Affairs (DEA) of the Ministry of Environment, Forestry, and Tourism (MEFT), along with the scoping EA report, as a supporting document to apply for an Environmental Clearance Certificate (ECC).

The EMP will serve as guidance for both Contractors and the Proponent during the proposed exploration operations, ensuring that environmental impacts are minimized or avoided wherever possible. Additionally, the EMP will be used in the process of reviewing the EIA scoping report for decision-making purposes.

1.4. Legal Requirements

In order to be considered, the EMP must meet the requirements specified in Section 8 (j) of the EIA Regulations. The review of the legal framework serves to inform the Proponent, affected and interested communities, as well as the decision-makers at the Ministry of Environment, Forestry, and Tourism: Department of Environmental Affairs (MEFT: DEAF) about the expectations and necessary elements of the EMP. The EMP not only adheres to the Environmental Management Act but also incorporates other relevant regulations, such as the Minerals (Prospecting and Mining) Act No. 33 of 1992 (Minerals Act), which pertains to exploration activities. This Act governs the exploration, prospecting, mining, disposal, and control of minerals in Namibia and addresses related matters.

The proponent bears the responsibility of ensuring that both the proposed activity and the EIA process comply with the principles of the Environmental Management Action Plan (EMAP). Moreover, they must ensure that any contractors appointed by them also adhere to the relevant Acts and regulations.

1.5. Assumptions and Limitations

This Environmental Management Plan (EMP) has been formulated while considering the following assumptions and constraints:

- The EMP is based on the scoping-level Environmental Impact Assessment (EIA) conducted for the proposed exploration on EPL 8100, which also includes an Archaeological and Cultural Heritage Impact Assessment Report.
- The mitigation measures outlined in this EMP are directly related to the risks and impacts identified in the scoping report. These risks and impacts were determined based on the provided project description and site investigation.
- It is essential to understand that the EMP is not a fixed document and can be modified as the project progresses or if there are changes to the project's scope. Any alterations to the project's scope will necessitate a reassessment of the impacts, and appropriate mitigation measures will be formulated accordingly.

2. ROLES AND RESPONSIBILITIES

The successful implementation and monitoring of the mitigation measures are crucial to fulfilling all the commitments outlined in the Environmental Management Plan (EMP) concerning the avoidance and reduction of identified impacts. The EMP and its monitoring program are ongoing processes, commencing from the project's design phase and continuing throughout development, operation, and, if applicable, decommissioning. Given this, it is of utmost importance that the proponent bears the entire responsibility for ensuring the efficient implementation of the EMP, as required, and ensuring robust monitoring practices are in place. The key individuals responsible for the effective implementation of the EMP may be assigned to the same person to streamline the process.:

- Proponent's Representative
- Environmental Control Officer

- Contractors and Subcontractors.

2.1. Proponent's Representative (PR)

The Proponent has identified a suitably qualified individual to assign the role of PR for all phases of exploration i.e. planning and design, operation, and decommissioning phase.

The following are the responsibilities for the PR:

- Act as the on-site project manager and implementing agent.
- Appoint the Environmental Control Officer (ECO);
- Make sure that the Employer's tasks and responsibilities are properly implemented and are in compliance with the relevant legislation and the EMP for the project.
- Ensure that all the necessary environmental authorizations and permits have been obtained before any project's work related to such permits.
- Assist the Contractor in finding environmentally responsible solutions to challenges that may arise (in cases where serious threats occur, or high impacts to or on the environment caused by the project, the workers may stop work.)
- The Employer must be informed of the reasons for the stoppage as soon as possible.
- The PR has the authority to issue fines for transgressions of basic conduct rules and/or contravention of the EMP;
- Should the Contractor or his/her employees fail to show appropriate consideration for the environmental aspect related to the EMP, the PR can have person (s) and/or equipment removed from the site or work suspended until the matter is resolved.
- Report to the Employer on the implementation of this EMP on site (with input from the ECO and/or independent environmental auditor);
- Maintain open and direct communication between the Employer, ECO, Contractor and I&As with regards to environmental matters, and;
- Attend regular site meetings and inspections.

2.2. Environmental Control Officer

To effectively manage the implementation of the EMP, the proponent must designate a responsible person, referred to as the Environmental Control Officer (ECO), to oversee and monitor the on-site implementation of the EMP. This responsibility encompasses all phases, starting from planning and design through to operation and decommissioning. The proponent or the Project Representative (PR) may opt to assign this role to a single individual for all phases or appoint separate ECOs for each phase to supervise the implementation of the EMP. The ECOs will have the following responsibilities:

- Overseeing the implementation of the EMP: Ensuring that all measures and actions outlined in the EMP are carried out as planned and within the specified timeframes.
- Conducting regular inspections: Performing on-site inspections to monitor compliance with the EMP's requirements and identifying any potential environmental issues or deviations.
- Documenting observations and findings: Keeping detailed records of inspections, findings, and any corrective actions taken to address environmental concerns.
- Reporting: Preparing regular reports on the status of EMP implementation, environmental performance, and any incidents or non-compliance issues discovered during inspections.
- Collaborating with stakeholders: Engaging with relevant parties, including project staff, contractors, regulatory authorities, and local communities, to ensure awareness and understanding of environmental responsibilities and requirements.
- Ensuring adherence to environmental regulations: Confirming that all project activities align with relevant environmental laws, regulations, and permit conditions.
- Implementing mitigation measures: Overseeing the application of appropriate mitigation measures to minimize environmental impacts and ensure adherence to best environmental practices.
- Responding to emergencies: Being prepared to take prompt action and follow

emergency response procedures in the event of environmental incidents or accidents.

2.3. Contractors and Subcontractors

Contractors and subcontractors play a significant role in ensuring environmental protection and compliance during the exploration phase. By fulfilling their responsibilities, contractors and subcontractors contribute to the successful execution of the environmental assessment, ensuring that the project is carried out in an environmentally responsible and sustainable manner.

The responsibilities of the Contractors and Subcontractors include:

- **Implementation of Mitigation Measures:** The contractors and subcontractors are responsible for effectively implementing the mitigation measures outlined in the Environmental Management Plan (EMP) to minimize environmental impacts.
- **Monitoring and Reporting:** The Contractors and subcontractors will participate in monitoring activities as required and report any environmental incidents or non-compliance promptly to the relevant authorities and project management.
- **Training and Awareness:** The contractors and subcontractors will ensure that their staff are trained and aware of the environmental requirements and responsibilities relevant to their roles.
- **Waste Management:** The Contractors and subcontractors will ensure the proper handling, disposal, and recycling of construction waste and hazardous materials will be carried out in line with approved procedures and regulations.
- **Biodiversity Conservation:** The Contractors and subcontractors will take measures to protect local biodiversity and habitats, especially in ecologically sensitive areas.
- **Water and Air Quality:** The Contractors and subcontractors will implement practices to protect water bodies and air quality, including proper management of stormwater and dust control measures.

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- Cultural Heritage: The Contractors and subcontractors will precautions to avoid disturbance to cultural heritage sites or artifacts and report any findings as required.
- Community Engagement: The contractors and subcontractors will engage with local communities, listen to their concerns, and address them appropriately during project activities.
- Emergency Response: The Contractors and subcontractors will always be prepared to respond to environmental emergencies and cooperate with the project team in the event of incidents.
- Environmental Performance Improvement: Continuously seek ways to improve environmental performance throughout the project's lifecycle.

3. ENVIRONMENTAL MANAGEMENT PLAN ACTIONS

The Environmental Management Plan (EMP) outlined in this Report is a dynamic document developed based on the findings of the scoping report. It is subject to continuous updates throughout the implementation of the proposed project. The EMP incorporates relevant Namibian environmental regulations, policies, as well as other local and international best practices concerning exploration projects. To address potential impacts, the EMP includes detailed action plans outlining management measures aimed at mitigating adverse effects. These measures are designed to ensure environmental compliance and sustainability during the project's execution.

3.1. Key Potential environmental impacts to be managed

From the EA, potential impacts per project phase have been identified and are summarised in the tables under subchapters 3.1, 3.2 to 3.5 as well as in the Scoping Report.

Table 0-1: Summary of key potential environmental impacts per project phase

	Project Phase	Potential impacts identified in the EA
1	Pre-Operation	Biodiversity and archaeological impacts
2	Operation	Health and safety, soil, surface and groundwater contamination, wildlife disturbance, dust, noise, environmental degradation, erosion, archaeological and social impacts.
3	Decommissioning	Loss of employment and soil, surface and groundwater contamination.

Management actions need to be employed to manage the potential impacts. The potential impacts rated in the EA and carried out for the proposed exploration development are presented in the following tables. The management actions were formulated based on the three project phases:

- Planning and design phase (pre-exploration) (**Table 0-2**).
- Operation and maintenance phase management actions (during exploration activities)
- **Table 0-3**).
- Decommissioning phase (**Table 0-4**)

The delegated personnel will assess the mitigation measures in detail and align their commitment to the specific management actions detailed in the table of the next subchapters.

Phase 1: Planning and Design Management Actions

The management requirements detailed in **Table 0-2** must be executed before any exploration activities commence on site. Also, necessary preliminary legislative and administrative arrangements must be set up in preparation for the proposed exploration activities.

Table 0-2: Planning and design management actions

Aspect	Management Requirement	Responsible PERSON/S	TARGET DATE
Labour Recruitment	Provisions mapped out to reduce the use of local labour should be inclusive within tenders concerning the: <ul style="list-style-type: none"> • Facilitation to allow equal treatment, non-discrimination, and equal opportunity of workers, and to establish, maintain, and improve the worker-management relationship, and promote compliance with national employment and labour laws. • Provision stating that all unskilled and skilled labour primarily considered people from local communities and should be included within tenders concerning the exploration operations. 	Eino Efeinge Telela Shaanika (the Proponent)	Ongoing

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	<ul style="list-style-type: none"> • Specific employment procedures ensuring local firms enjoy preference during tender adjudication should be included within tenders that have to do with the exploration operations. • Provisions promoting gender equality pertaining to recruitment should be included within tenders concerning the exploration operations. 		
Occupational Health and Safety	<ul style="list-style-type: none"> • Development and submitting of the Emergency Preparedness and Response Plan. • Commit to all the Namibian Health and Safety Regulations under the Labour Act and Exploration and Mining Safety Regulations. • Training on Occupational health and Safety Training for all the employees. • There should be always a qualified first aid. • Active and correctly usage of all Personal Protective Equipment (PPE). 	<ul style="list-style-type: none"> • PR/ECO/Contractors 	<ul style="list-style-type: none"> • Ongoing

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<p>EMP Implementation and Monitoring</p>	<ul style="list-style-type: none"> • Ensure that the EMP is executed during all exploration project phases. • Adhering effectively to all relevant legislation and this EMP. • Providing regular meetings as a reminder of all the EMP details and doing site inspections. 	<ul style="list-style-type: none"> • PR/ECO/ Contractors 	<ul style="list-style-type: none"> • Ongoing
<p>Consultation with affected communities</p>	<ul style="list-style-type: none"> • Conduct ongoing informed consultation and participation with the affected communities (community, local and traditional authorities) prior to any exploration activities commencement and throughout the activities to provide them with the following information. <ul style="list-style-type: none"> ○ Detailed work plan with regards to the exploration activities. ○ Discussion of access agreements. ○ Discussion of compensation (as necessary). 	<ul style="list-style-type: none"> • Eino Efeinge Telela Shaanika / PR/ ECO 	<ul style="list-style-type: none"> • Ongoing

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	<ul style="list-style-type: none"> ○ Any other concerns or information requirements that the farmers may have. ○ Implementing the grievance mechanism with the affected communities to ensure that all the concerns and grievances related to the project are received, noted, and resolved. ○ Resolve the affected communities' issues and concern promptly and transparently and in a culturally fitting way. ○ An allegiance by the exploration company for the rehabilitation of the site when exploration activities are decommissioned. 		
Archaeology	<ul style="list-style-type: none"> ● An archaeological expert must be contracted to conduct a detailed archaeological survey and monitoring once targets have been identified for drilling and/or other mechanically assisted exploration. Should a heritage or archaeological site be uncovered, 	<ul style="list-style-type: none"> ● Eino Efeinge Telela Shaanika 	<ul style="list-style-type: none"> ● During phase two and

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	an Archaeological Chance Finds Procedure should be applied as outlined in Appendix K of the Scoping Report.		phase three
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Phase 2: Operational Phase Management Actions

The management actions for the operational phase during which the exploration activities are listed in

Table 0-3.

Table 0-3: Operation phase management actions

Environmental Feature	Potential Impact	Management Actions	Responsible Person(s)	Target Date
Waste Management	Visual impact and soil contamination	<ul style="list-style-type: none"> • The exploration site should always be kept tidy. • The exploration activities should strictly happen within the project footprint. • All domestic and general waste accumulated daily should be cleaned and contained daily. • No waste may be buried or burned. 	<ul style="list-style-type: none"> • PR/ECO/Contractors 	<ul style="list-style-type: none"> • Ongoing

		<ul style="list-style-type: none"> • Waste containers (bins) should be emptied regularly and removed from site to the nearest municipal waste disposal site. • All recyclable waste needs to be taken to the nearest recycling depot. • Several, separate waste containers (bins) for hazardous and domestic / general waste must be provided on site. • Employees should be sensitised to dispose of waste in a responsible manner and not to litter. • All the wastes must be removed from site after the completion of the project. 		
Hazardous Waste	Soil and groundwater	<ul style="list-style-type: none"> • All heavy operation vehicles and equipment on site must be supplied 	<ul style="list-style-type: none"> • PR/ECO/Contractors 	<ul style="list-style-type: none"> • Phase two and Phase three of

	contamination	<p>with a drip tray to prevent spill-outs</p> <ul style="list-style-type: none"> • All heavy operation vehicles should be maintained regularly to avoid oil leakages. • Maintenance and washing of operation vehicles must happen only at a designated workshop. 		the project
Groundwater	Groundwater contamination	<ul style="list-style-type: none"> • The usage of the toilets instead of the veld must be strictly adhered to. • If grey water can be collected from ablution facilities at the contractors' camp it should be recycled and: <ul style="list-style-type: none"> ○ Used for dust suppression; ○ Used to water vegetable gardens or to support a small nursery in local communities (as and when agreed upon by such 	<ul style="list-style-type: none"> • All the Employees and Contractors 	<ul style="list-style-type: none"> • Ongoing

		<p>communities); and/or</p> <ul style="list-style-type: none"> ○ Used to clean equipment. • All run off materials such as hydrocarbons, wastewater and other potential contaminants should be contained on site appropriately and disposed of in accordance with municipal wastewater discharge standards, so that they do not reach to ground or surface water systems. • Wastewater (excluding sewage) should be drained into lined / impermeable catch pits, big enough for daily / weekly usage without overflowing. Water from these catch pits should be removed from site to the nearest wastewater treatment facility by 		
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		<p>an approved wastewater removal company.</p> <ul style="list-style-type: none"> • Employees must properly be trained on the groundwater impact awareness., • There must be an established and maintained emergency preparedness and response system that facilitates space for responding to any accidental and emergency situations to prevent and mitigate any harm to people and the environment. This can account for major / minor spills and firefighting at the exploration site during exploration activities (with consideration of air, groundwater, soil and surface 		
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		water).		
Soil	Soil contamination	<ul style="list-style-type: none"> • Spill control preventative measures should be put in place to control soil contamination. • An impermeable liner should be placed on site to prevent contamination from reaching to surrounding soils and groundwater systems. • Potential contaminants such as hydrocarbons and wastewater should be placed in appropriate containers on site and be disposed of in accordance to municipal wastewater discharge standards to ensure that they do not contaminate soils in the area. • Soil contamination should be 	<ul style="list-style-type: none"> • PR/ECO 	<ul style="list-style-type: none"> • Ongoing

		<p>monitored on site daily by PR and monthly by ECO.</p> <ul style="list-style-type: none"> • ECO(s) should ensure that enough number of drip trays are available on-site and that these are utilised in the event of leakage from construction trucks or vehicles. • Contaminated soils onsite that may have resulted from leakage/spillage from construction vehicles or equipment should be removed to a depth dependent on the size of the spill and disposed at a designated landfill. The removed soil must be replaced with clean soil. 		
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<p>Biodiversity</p>	<p>Loss of Biodiversity</p>	<ul style="list-style-type: none"> • Recommendations and mitigation measures as provided by the vegetation study with regards to the protection of biodiversity in the area should be adhered to and monitored during exploration activities. • Trees with a trunk size of 150 mm and bigger should be surveyed, marked with paint (readily visible) and protected. • Trees that are not within the footprint should be left to preserve biodiversity in the area. • If cleared, the numbers of protected, endemic and near endemic species removed should be documented. 	<ul style="list-style-type: none"> • PR/ECO/Contractors 	<ul style="list-style-type: none"> • Ongoing
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		<ul style="list-style-type: none"> • Trees and plants protected under the Forest Act No 12 of 2001 must not be removed without a valid permit from the local Department of Forestry. 		
Terrestrial environment	Noise and dust	<ul style="list-style-type: none"> • The dust generated during the exploration activities should be reduced by means of water spray. • If attainable, wastewater should be treated to an acceptable water quality level, so that it can be used for dust suppression. • Noise levels during exploration activities should be kept within the allowable standards for urban areas. • Noise levels should adhere to the SANS restrictions on noise. 	<ul style="list-style-type: none"> • PR/ECO/Contractors 	<ul style="list-style-type: none"> • Ongoing

		<ul style="list-style-type: none"> • The working hours should be restricted to daytime due to the use of heavy equipment, power tools and the movement of heavy vehicles. • Noisy equipment should be off when not used to avoid noise pollution on site and its surroundings. • Workers should wear ear plugs when performing noisy tasks and should be rotated regularly to avoid exposing them to excessive noise for a long period of time in a day. • Workers should be equipped with personal protective equipment (PPE) such as earplugs to reduce 		
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		<p>noise exposure.</p> <ul style="list-style-type: none"> Workers should ensure that they always wear the PPE on work sites. 		
Health and Safety	Health and safety impacts	<ul style="list-style-type: none"> The contractor(s) should ensure that all personnel are equipped with personal protective equipment (PPE), such as coveralls, gloves, safety boots, safety glasses and hard hats always. Workers should ensure that they always wear their PPE at work, in an appropriate way. Alcohol should be prohibited during working hours. No workers should be allowed on site if under the influence of 	<ul style="list-style-type: none"> PR/ECO/Contractors 	<ul style="list-style-type: none"> Ongoing

		<p>drugs and alcohol.</p> <ul style="list-style-type: none"> • An appropriate location should be indicated on the site for the parking of operation vehicles and must be demarcated to be visible to everyone. • Public access to the exploration site should be prohibit. 		
Exploration labourers		<ul style="list-style-type: none"> • The Proponent should ensure that locals got the priority for employment of any type of a job. • Portable toilets (i.e., easily transportable) should be available on site. • Separate bathrooms or toilets should be available for men and women and should clearly be indicated as such. • Sewage waste needs to be 	<ul style="list-style-type: none"> • Eino Efeinge Telela Shaanika 	<ul style="list-style-type: none"> • Ongoing

		<p>removed on a regular basis to the nearest approved sewage disposal site.</p> <ul style="list-style-type: none"> • Workers responsible for cleaning the toilets should be provided with latex gloves, rubber boots, overalls, masks and all the necessary PPE for cleaning. • No workers may reside on-site for the entire duration of the exploration period. Only a security guard will be allowed to sleep on-site (if there will be any). • The proponent or contractor should draft a Communication Plan, which should outline as a minimum the following: <ul style="list-style-type: none"> ○ How stakeholders, who require ongoing 		
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		<p>communication for the duration of the exploration period, will be identified and recorded and who will manage and update these records.</p> <ul style="list-style-type: none"> ○ How these stakeholders will be engaged throughout the project lifetime. ○ Provision should be made for a grievance mechanism – outlining how to discover and assess the issues raised and determine how to address them, inclusive of further 		
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		<p>steps of arbitration if feedback is deemed unsatisfactory.</p> <ul style="list-style-type: none"> ○ There should be continues engagement with the stakeholders and affected communities to ensure they are aware of the relevant communication channels and that they are part of the project decision making where needed. 		
Water	Groundwater contamination	<ul style="list-style-type: none"> • No wastewater / effluent should be allowed to leave the site premises without proper control. 	<ul style="list-style-type: none"> • PR/ECO/Contractor 	<ul style="list-style-type: none"> • Ongoing

		<ul style="list-style-type: none"> • The disposals should be done in accordance with municipal wastewater discharge standards. • Daily maintenance of exploration equipment and vehicles should be done to detect early spills or leakages. • An emergency responsive plan should be available for major / minor spills at the exploration site during operation (with consideration of air, groundwater, soil and surface water) to prepare the workers on how to respond to any emergency. • Groundwater impact awareness should be raised among the employees involved in this phase. 		
Wildlife and	Disturbance of	<ul style="list-style-type: none"> • Working hours should be 	<ul style="list-style-type: none"> • Eino Efeinge Telela 	<ul style="list-style-type: none"> • Prior to the

Stock animals	wildlife and stock theft	<p>committed to during the day so that the wildlife can roam freely at night.</p> <ul style="list-style-type: none"> The contractor is to compile a Non-Theft Policy to which all workers are to comply with. All exploration workers are to cohere to the Non- Theft Policy. 	Shaanika / PR/ECO/Contractors	<p>project commencement (in the employment contract).</p> <ul style="list-style-type: none"> Ongoing
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Phase 4: Rehabilitation and Decommissioning Management Actions

The table below presents the management action for decommissioning phase.

Table 0-4: Decommissioning phase management actions

Environmental Feature	Impact	Management Actions	Responsible Person/s	Target date
Employment	Loss of	<ul style="list-style-type: none"> The Proponent should tell the 	<ul style="list-style-type: none"> Eino Efeinge Telela 	<ul style="list-style-type: none"> At least 6

	employment	<p>employees well in advance, of any intentions to cease the exploration activities, and the expected date of such.</p> <ul style="list-style-type: none"> • The Proponent should encourage and raise awareness of the possibilities for work in other industrial sectors. • Conduct a skills training programme during the operations phase. 	Shaanika (proponent)/PR/ECO/Contractors	<p>months before the project closure</p> <ul style="list-style-type: none"> • Ongoing
Rehabilitation	Groundwater contamination	<ul style="list-style-type: none"> • During the initial prospecting phase, only limited surface rock and soil sampling will take place and it is unlikely that any damage be left by this activity. • All waste, inoperative samples, and any other remains from the site must be removed. 	• PR/ECO/Contractors	<ul style="list-style-type: none"> • Throughout the entire phase 2 and Phase 3.

		<ul style="list-style-type: none"> • All sample bags, plastic waste, survey pegs, materials used for sump creation etc. from site at completion of sampling schedule must be detached. • Site should be returned to as close as possible to its original condition. • Re-contour and rip the drill site before the site is finally decommissioned. • Fill holes, rip up, rake track, and spread stockpiled topsoil back over the entire new tracks made, to allow re-vegetation. • Make sure that the ECO did a site inspection prior to and after rehabilitation to check rehabilitation efforts of each 		
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		drill site.		
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4. SITE CLOSURE AND REHABILITATION

Rehabilitation involves the restoration of areas impacted by exploration activities to their original state as much as possible. Its primary goal is to revive the damaged or disturbed environment back to its pre-exploration condition. The rehabilitation plan encompasses addressing various aspects, such as the access road, vehicle tracks, vegetation removal, abandoned exploration drill holes, and the restoration of areas covered by sampling stockpile and rock piles.

To achieve this, the disturbed areas will be covered with collected topsoil and evenly spread. Whenever feasible, all native plant species removed from these areas will be replanted. The ultimate vision for project closure is to create a safe, stable, and environmentally friendly landscape that supports integrated, self-sustaining, and value-generating opportunities, leaving a positive and lasting legacy.

4.1. Site closure and rehabilitation activities

All waste, including hazardous and domestic waste, will be transported offsite to licensed landfills in Uis or other nearby towns like Henties Bay or Omaruru for proper disposal. Any areas that have been damaged or contaminated will be thoroughly cleaned, treated as necessary, and restored as closely as possible to their original state.

Specific actions to be taken during the rehabilitation process include:

- Removing camping structures.
- Unfastening equipment on-site.
- Clearing associated infrastructures such as storage tanks, solar panels, and heavy-duty generators.
- Rehabilitating and closing access tracks created where roads were absent, in consultation with landowners, as part of standard closure procedures.
- Utilizing existing secondary roads in the area to prevent damage to the main road.
- Utilizing recovered topsoil and subsoil to restore the original soil profile.

To minimize environmental impact, the rehabilitation actions will be carried out concurrently with phase three (3) of the exploration activities, rather than waiting until the end of the project's lifetime. This approach will help reduce damage to the environment during the exploration process.

4.2. Remediation of Contaminated Areas

Contaminated soil containing hydrocarbons will be appropriately addressed by removing and excavating it in accordance with the disposal requirements set by the nearest town council at suitable sites. The management of removed soils will be tailored based on the nature and extent of the contamination. Furthermore, all equipment that has been used for storing or transporting chemicals will be thoroughly cleaned and disposed of at a suitable disposal facility.

4.3. Waste Management

Waste management activities will include:

- Hazardous waste will be managed, properly handled, classified and disposed.
- No burning and burying of waste within the footprint of the project or around its surrounding
- Nonhazardous substances will be disposed of in the nearby landfill sites.
- If required, temporary salvage yards will be fenced for security reasons, particularly where these are located close to public roads.
- All the project equipment must be stored in a well-demarcated area, and all the hazardous substances must be in well-labelled containers to avoid spill-offs.

5. CONCLUSION

According to the Environmental Management Plan (EMP) recommendations, SS Consultants is confident that the proposed exploration activities, as described in Chapter 2 of the scoping report, have the potential to be granted an Environmental Clearance Certificate. This is contingent upon strict adherence to the EMP and compliance with all legal requirements related to the development. The EMP should serve as an on-site and living guiding document throughout all phases of the project, with regular auditing to ensure effective

implementation. Parties responsible for any breaches of the EMP should be held accountable for any required rehabilitation.

Overall, the potential environmental impacts of the proposed project are expected to have a low probability of occurrence, limited extent, and low magnitude and temporary duration on the receiving environment (physical, biological, socioeconomic environments, and ecosystem functions). The report serves as a framework for combining mitigation measures and applicable legal tools to ensure both environmental compliance and protection of the ecosystem. To ensure successful implementation of the proposed mitigations and effective environmental management during exploration activities, the proponent must allocate sufficient human and financial resources.

6. RECOMMENDATIONS FOR MONITORING

For the environmental impacts to be avoided and/or minimized, the monitoring measures below must be implemented:

- Monitoring of the implementation of mitigation measures to ensure success as set out in the EMP has been complied with.
- Non-compliance is to be recorded and discussed at weekly site meetings and timeous remedial actions taken.
- Should dust and noise complaints be received, moderation measures should be implemented such as water spraying, and continued communication should be held with the aggrieved parties until the noise and dust matters are clarified.

7. REFERENCES

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