



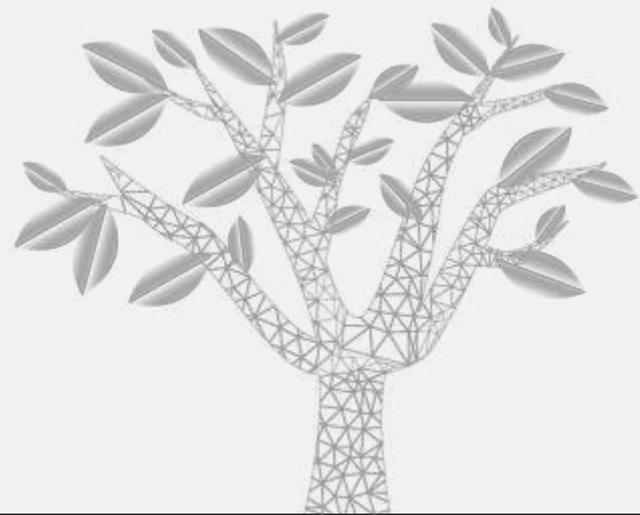
**MARVIN**  
**ENVIRONMENTAL PROJECT**  
CONSULTANTS CC

*Experts in Sustainable Development*

**URAPLANT MINING (PTY) LTD**

**ENVIRONMENTAL MANAGEMENT  
PLAN FOR THE PROPOSED  
EXPLORATION ACTIVITIES ON EPL  
7800 IN KHOMAS AND HARDAP  
REGION**

**MARCH 2022**





# CONTENTS

<b>1</b>	<b>Aims.....</b>	<b>6</b>
<b>2</b>	<b>EMP Objectives .....</b>	<b>6</b>
<b>3</b>	<b>LEGAL REQUIREMENTS .....</b>	<b>7</b>
<b>4</b>	<b>ENVIRONMENTAL MANAGEMENT COMMITTEE.....</b>	<b>7</b>
<b>4.1</b>	<b>TRANSLATION OF EMP INTO COMPANY POLICY .....</b>	<b>8</b>
<b>4.2</b>	<b>MITIGATION ACTIONS.....</b>	<b>8</b>
<b>4.3</b>	<b>RISK PREPAREDNESS AND RESPONSE PLAN.....</b>	<b>8</b>
<b>4.4</b>	<b>GRIEVANCE MECHANISM .....</b>	<b>9</b>
<b>4.4.1</b>	<b>Timely Action.....</b>	<b>9</b>
<b>4.4.2</b>	<b>Accepting the Grievance.....</b>	<b>9</b>
<b>4.4.3</b>	<b>Identifying the Problem .....</b>	<b>9</b>
<b>4.4.4</b>	<b>Collecting the Facts .....</b>	<b>9</b>
<b>4.4.5</b>	<b>Analysing the cause of the Grievance .....</b>	<b>9</b>
<b>4.4.6</b>	<b>Taking Decision.....</b>	<b>10</b>
<b>4.4.7</b>	<b>Implementing the Decision.....</b>	<b>10</b>
<b>4.5</b>	<b>EXTERNAL COMMUNICATIONS.....</b>	<b>10</b>
<b>4.6</b>	<b>RECOMMENDATIONS.....</b>	<b>10</b>
<b>4.7</b>	<b>Reporting .....</b>	<b>10</b>
<b>5</b>	<b>the way forward.....</b>	<b>24</b>
<b>5.1</b>	<b>Way forward for the scoping report.....</b>	<b>24</b>
<b>6</b>	<b>Conclusion.....</b>	<b>24</b>
	<b>.....</b>	<b>25</b>

## LIST OF TABLES

Table 3-1:	Permits and authorization .....	7
Table 4-1:	Composition of Environmental Management Committee .....	7
Table 4-2:	Environmental Mitigation Measures to geological filed mapping and ground geological survey.....	11
Table 4-3:	Environmental Management Measures to Geochemical Sampling campaign and Sample Analysis	15
Table 4-4:	Environmental Management Measures- Drill Site Establishment.....	16
Table 4-5:	Environmental Management Measures- Drilling.....	18
Table 4-6:	Environmental Management Measures- Social Issues and Training .....	21
Table 4-7:	Environmental Management Measures- Closure and Rehabilitation.....	22

## ACRONYMS AND ABBREVIATIONS

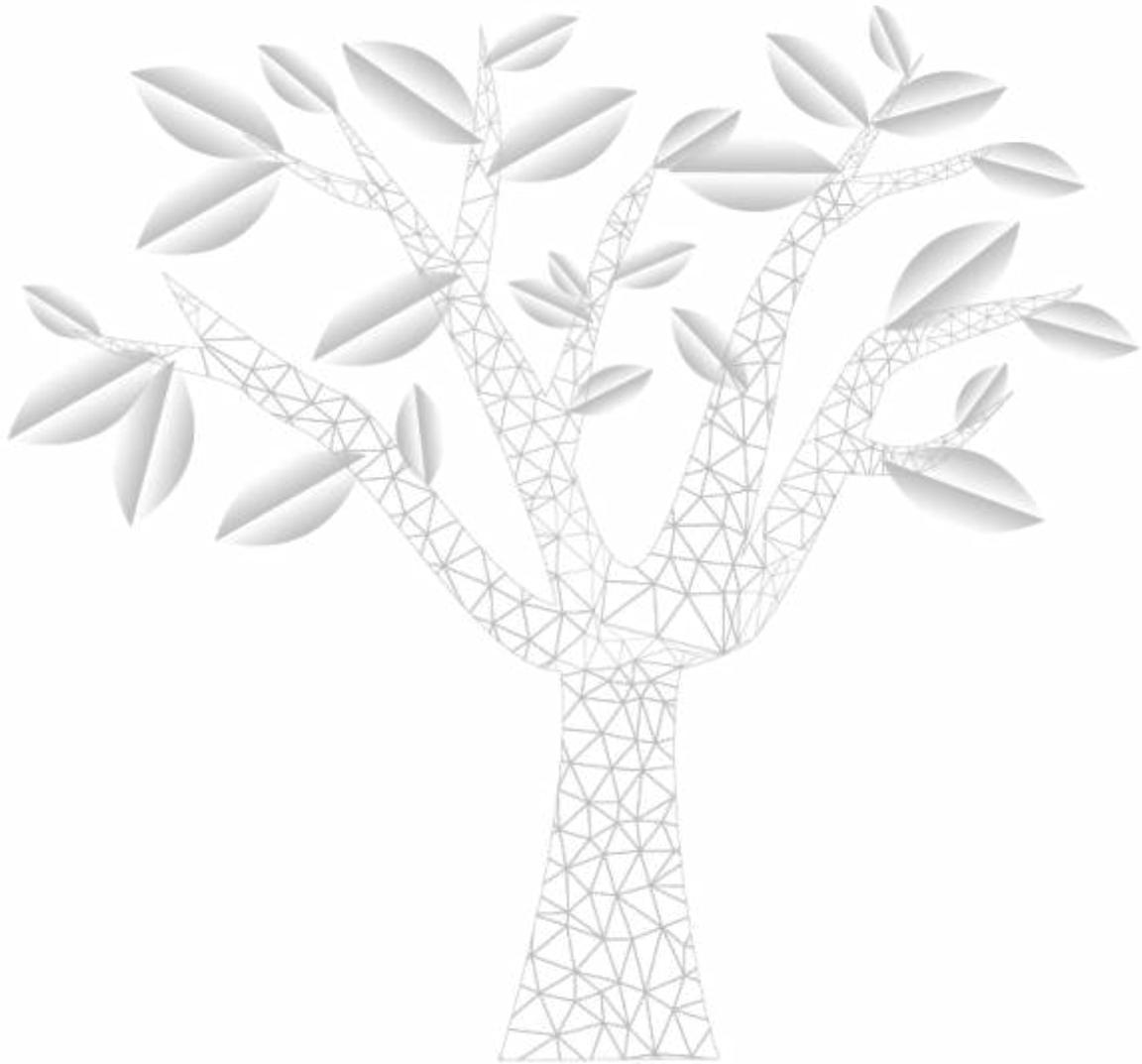
Below a list of acronyms and abbreviations used in this report.

Acronyms	Definition
EAPAN	Environmental Assessment Professionals' Association of Namibia
EPL	Exclusive Prospecting License
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
MET	Ministry of Environment and Tourism
MET: DEA	Ministry of Environment and Tourism: Department of Environmental Affairs
Target area	The area of the EPL intended for exploration activities
TLB	Tractor-Loader-Backhoe
MME	Ministry of Mines and Energy

### Units used in the report

Unit	Definition
°C	degrees centigrade
cm/s	centimetres per second
g	grams
g/ℓ	grams per litre
g/m <sup>2</sup>	grams per square metre
km	kilometres
km/h	kilometres per hour
km <sup>2</sup>	square kilometres
m	metres
m <sup>3</sup> /day	cubic metres per day
mg/ℓ	milligrams per litre
Mℓ	megalitre (1,000 m <sup>3</sup> )
MLD	megalitres per day
mm	millimetres
m/s	metres per second
ppt	parts per thousand
tons/km <sup>2</sup>	tons per square kilometre
>	greater than
<	less than

%	percent
$\mu\text{g}/\ell$	micrograms per litre
$\mu\text{M}$	Micromole
$\mu\text{m}$	Micron



## 1 AIMS

The aim of the Environmental Management Plan (EMP) is to detail the actions required to effectively implement mitigation and management measures. These actions are required to minimise negative impacts and enhance positive impacts associated with the proposed Exploration activities on EPL 7800.

**The EMP (Environmental Management Plan) is commitment by the proponent to incorporate environmental protection in daily operations. The EMP gives the commitments, which form the environmental contract between Uraplant Mining (PTY) Ltd (PTY) Ltd and the Government of the Republic of Namibia; represented by the Ministry of Environment, Forestry and Tourism (MEFT).**

It is important to note that an EMP is a living document in that it will be updated and amended as new information (e.g. environmental data), policies, authority guidelines and technologies develop. The conceptual management measures proposed to mitigate the potential impacts are detailed in the action plans below.

## 2 EMP OBJECTIVES

The overall environmental objectives are identified to ensure Uraplant Mining (PTY) Ltd implements this EMP across the board of all exploration activities on all the EPL (7800);

- To ensure continues engagement with the landowners prior to and during exploration activities to enhance the proponent's relationship with landowners and avoid potential community grievances':
- Ensure protection of fauna and flora and where necessary removal of vegetation is undertaken with the consent of the landowners and yet avoiding protected and or endemic flora and fauna
- Manage the aspect of air quality by implementing measures that would avoid elevated dust emissions
- Implement a chance find procedure in an event of a discovery of an archaeological artefact ;
- Manage the aspect of noise impact on the EPL where target sites are in close proximity with the receptors.
- Implement rehabilitation measures required to mitigate potential loss of land capability
- To ensure appropriate waste management measures are implemented
- To avoid and mitigate any potential soil pollution;
- To implement health and safety measures across all exploration activities

- Ensure appropriate closure and rehabilitation of all drill sites.

### 3 LEGAL REQUIREMENTS

Before commencement of the proposed exploration activities, the following environmental certifications and documentations shall be required.

Table 3-1: *Permits and authorization*

Certification and documentation	Institution/competent authority
Environmental Clearance Certificate	Ministry of Environmental, Forestry and Tourism
Domestic and industrial wastewater and effluent discharge permits	Ministry of Agriculture, Water and Land Reform
Ground survey method statement	Environmental Management Committee
Method statement for Soil and Rock Surveys	Environmental Management Committee
Rehabilitation and exit operation plan	Environmental Management Committee
Baseline Environmental Monitoring plan	Environmental Management Committee
SOPs (Standard operation procedures)	Environmental Management Committee

### 4 ENVIRONMENTAL MANAGEMENT COMMITTEE

Within the structure of the proponent, must establish as an Environmental Management Committee (EMC). There is no need for the proponent to recruit new employees as this will constitute persons who are employed by the proponent. For specialized environmental services, the proponent may hire an IEC (independent environmental consultant) on contract basis.

Below are proposed committee members as well as required competency and responsibilities.

Table 4-1: *Composition of Environmental Management Committee*

Personnel	Competence	Responsibilities
Environmental management representative	Should be in employment of the proponent. Should be a senior staff member with a management position in the company. Preferably a Geologist/Head of Exploration.	<ul style="list-style-type: none"> <li>• Represent management on environmental safety and occupational issues related to ground survey, rock and soil sampling.</li> <li>• Provide support and avail resources needed to endorse and implement the EMP.</li> </ul>

Environmental safety and occupational representative (ESOR)	Should be in employment of the proponent. A minimum of grade 12, sufficient knowledge of exploration activities and ethics at work place. Preferably a Site Supervisor.	<ul style="list-style-type: none"> <li>• Represent employees' environmental safety and occupational concerns related to underwater hull cleaning operations.</li> <li>• Ensure other employees comply to conditions as required in the environmental compliance certificates or permits.</li> <li>• The ESOR may call off the exploration activities if: <ul style="list-style-type: none"> <li>-Illegal activities are suspected.</li> <li>-Excessive dust arises from activities related to this project other than natural or other events.</li> <li>-Where untoward situation arises that may constitute a hazard to human life or environment and the equipment or other assets.</li> </ul> </li> </ul>
Independent Environmental Consultant (IEC)	Master's degree or BSc. in the field of environmental or natural resources management, marine biology or water science. Knowledge of environmental impact assessment, EMP implementation and baseline environmental monitoring is compulsory. Field survey co-ordination and laboratory analytical skills will an added advantage.	<ul style="list-style-type: none"> <li>• The overall responsibility of the IEC is to draft the Proponent's ensure environmental compliance and certification with GRN policies and legislation.</li> <li>• IEC will advise the EMC in issues with regard to EMP implementation and environmental rehabilitation.</li> </ul>

#### 4.1 TRANSLATION OF EMP INTO COMPANY POLICY

The proponent is required to formulate and endorse an environmental policy. This will be a written statement committing the proponent to adhere to the EMP and it will describe how the proponent shall prevent, reduce as well as rehabilitate the environment.

#### 4.2 MITIGATION ACTIONS

All the mitigatory action raised are interlinked to environmental Aspects identified during the EIA process Table 4-2 to 4-7 provide a summary of identified issues and corresponding management plans (section 6 of this EMP). **Mitigation actions that are required to reduce or minimize negative impacts are described in table.**

#### 4.3 RISK PREPAREDNESS AND RESPONSE PLAN

Risk is an event that may or may not happen; whereas an impact is what will happen if a risk occurs. Risks poses a significant impact to people, the environment or property. Although they may or not happen, there is a need to be prepared to response to risks at all times.

All response actions should be geared toward the following priorities in the order below:

- **Safety** of people (always First);
- **Protection** of the Environment, and
- **Protection** of Assets.

Emergence Preparedness and Response Management shall be implemented through by following (5) steps as follow: prevent, mitigate, prepare, rehabilitate and recover.

#### **4.4 GRIEVANCE MECHANISM**

The procedure for the management of internal grievances will be enforced as follows:

##### **4.4.1 Timely Action**

This should be the first action; the sooner a grievance is settled, the lesser it will affect the operation's performance.

##### **4.4.2 Accepting the Grievance**

The supervisor shall recognize and accept the employee grievance as and when it shall be expressed. Acceptance shall not necessarily mean agreeing with the grievance; it rather shows the supervisor's willingness to look into the complaint objectively and dispassionately.

##### **4.4.3 Identifying the Problem**

The grievance expressed by the employee shall be at times simply emotionally, over-toned, imaginary or vague. The supervisor, therefore, shall be required to identify or diagnose the problem stated by the employee.

##### **4.4.4 Collecting the Facts**

Once the problem is identified as a real problem, the supervisor should, then, collect all the relevant facts and proofs relating to the grievance. The facts so collected shall be separated from the opinions and feelings to avoid distortions of the facts.

##### **4.4.5 Analysing the cause of the Grievance**

Having collected all the facts and figures relating to the grievance, the next step involved in the grievance procedure shall be to establish and analyse the cause that led to grievance. The analysis of the cause shall involve studying various aspects of the grievance such as the employees past history, frequency of the

occurrence, management practices, union practices, etc. Identification of the cause of the grievance helps the management to take corrective measures to settle the grievance and also to prevent its recurrence.

#### **4.4.6 Taking Decision**

In order to take the best decision to handle the grievance, alternative courses of actions shall be worked out. These are, then, evaluated in view of their consequences on the aggrieved employee, the union and the management. Finally, a decision taken shall best suited the given situation. Such decision should serve as a precedent both within the department and the company.

#### **4.4.7 Implementing the Decision**

The decision shall be immediately communicated to the employee and also implemented by the competent authority.

In case, it is not resolved, the supervisor once again needs to go back to the whole procedure step by step to find out an appropriate decision or solution to resolve the grievance.

### **4.5 EXTERNAL COMMUNICATIONS**

External communications shall be handled in line with company procedures.

### **4.6 RECOMMENDATIONS**

It is recommended that:

- The proponent strictly adheres to EMP and rehabilitate areas for them to recover;
- Environmental monitoring should undertake to assess recovery, and
- Data from environmental rehabilitation should be kept and availed to GRN authorities when requested.

### **4.7 REPORTING**

Environmental rehabilitation and monitoring should be reported regulating authority when requested. This should be done either by submitting quarterly or annual reports.

Table 4-2: Environmental Mitigation Measures to geological filed mapping and ground geological survey.

Activity	Potential Impact	Management and Mitigation Measures	Action Plan	
			Frequency	Responsible Parties
Geological field Mapping and ground geophysical survey	Socio-economic	<ul style="list-style-type: none"> <li>- Honour agreements set out in the site (land)-access contracts</li> <li>- Consult with local farmers/communities and provide feedback regarding activities</li> <li>- Provide contact details to a designated person, who will serve as liaison between community and the exploration teams</li> <li>- Farm owners to be provided with a list of all people working on site</li> <li>- All staff operating on site will be provided with identification and proof that they are working for the proponent.</li> </ul>	Duration of survey	Head of Exploration and Site supervisor
	Ecosystem diversity/sensitive habitats	<ul style="list-style-type: none"> <li>- The proponent shall appoint an IEC (independent environmental Consultant) to advise on environmental matters before commencement of intrusive activities (i.e. creating cut lines, access tracks, etc.).</li> <li>- After removal of grass and topsoil the site should be rehabilitated to original state to allow regrowth and recovery.</li> <li>- Land degradation is major threat to habitats and exploration that may contribute to further degradation shall be avoided or when undertaken the proponent shall submit to the IEC a rehabilitation plan.</li> </ul>	Duration of survey	EMC (environmental management committee)

Activity	Potential Impact	Management and Mitigation Measures	Action Plan	
			Frequency	Responsible Parties
		<ul style="list-style-type: none"> <li>- Open fires shall be prohibited on sites. Employees and contractors will use gas cookers for all cooking needs.</li> </ul>		
	Geomorphology and landscape	<ul style="list-style-type: none"> <li>- Use of renewable energy should be encouraged.</li> <li>- Oil and chemical spills should be avoided or minimized.</li> <li>- Solid waste may only be disposed at approved waste facilities.</li> </ul>		EMC
	Biodiversity/flora	<ul style="list-style-type: none"> <li>- The harsh climate in all EPLs expose fauna diversity to higher risks of biodiversity loss and overexploitation. The proponent shall implement a zero-tolerance policy with regards to cutting trees and collecting of firewood. This applies to employees of the proponent as well as employees of contractors working for the proponent.</li> <li>- There is already one invasive plant especially in the Nossob river basin. No plant maybe further introduced.</li> </ul>		EMC
	Biodiversity/fauna	<ul style="list-style-type: none"> <li>- No poaching or similar activities shall be allowed.</li> <li>- There shall be a vehicle speeds of 40km/h to minimise accidental road kills of small mammals, reptiles and other fauna.</li> <li>- Through environmental awareness, employees and contractors shall be shown the value of biodiversity and the need to conserve the species and habitats that occur within the project area.</li> <li>- No construction of fence may be allowed as they obstruct the migratory routes of game animals.</li> </ul>		EMC

Activity	Potential Impact	Management and Mitigation Measures	Action Plan	
			Frequency	Responsible Parties
		<ul style="list-style-type: none"> <li>- Pets should be avoided or kept under control and activities that may lead to introduction of invasive species should be avoided.</li> </ul>	Duration of survey	EMC
	Air quality	<ul style="list-style-type: none"> <li>- Vehicle speeds will be limited to 40km/h on access routes to limit dust.</li> <li>- National Road Safety Regulations that applies to usage of seatbelts and adhering to speed limits within gravel road tarred roads is to apply</li> </ul>	Duration of survey	Head of Exploration Site supervisor
	Heritage	<ul style="list-style-type: none"> <li>- In the event that archaeological resources are discovered, a chance find emergency procedure will be implemented which includes the following: <ul style="list-style-type: none"> <li>o All work at the find will be stopped to prevent damage;</li> <li>o An appropriate heritage specialist will be appointed to assess the find and related impacts; and</li> <li>o Permitting applications will be made to the necessary authorities, if required.</li> </ul> </li> <li>- In the event that any graves are discovered during the exploration activities, these will be avoided and preserved as a first priority. If damage is unavoidable, prior to damaging or destroying any identified graves, permission for the exhumation and relocation of graves must be obtained from the relevant descendants (if known) and the relevant local and provincial authorities.</li> </ul>	Duration of survey	Head of Exploration Site supervisor

Activity	Potential Impact	Management and Mitigation Measures	Action Plan	
			Frequency	Responsible Parties
		- Permits will be required for the removal of protected tree species. (Refer to Section 5.3)		

Table 4-3: Environmental Management Measures to Geochemical Sampling campaign and Sample Analysis

Activity	Potential Impact	Management and Mitigation Measures	Action Plan	
			Frequency	Responsible Parties
Soil and rock sampling	<b>Socio-economic</b>	<ul style="list-style-type: none"> <li>- Refer to socio-economic management measures relating to ground surveying (Table 4-2)</li> </ul>	Planning. Duration of survey	Head of Exploration Site supervisor
	<b>Biodiversity</b>	<ul style="list-style-type: none"> <li>- Refer to biodiversity management measures relating to ground surveying (Table 4-2)</li> <li>- Rehabilitate all excavations sites by infilling and topsoil replacement.</li> <li>- Rehabilitate access tracks and cut lines by ripping, unless the land owner wishes to continue using the access tracks for his/her farming activities.</li> <li>- Farm owners should be invited to carry out site inspections following rehabilitation in order to ensure that it has been carried out suitably.</li> <li>- Uraplant Mining (PTY) Ltd (PTY) Ltd policy is to open and close pit/ excavations within single days in order to minimise the risks associated with excavations.</li> </ul>	Duration of survey	Head of Exploration Site supervisor

Table 4-4: Environmental Management Measures- Drill Site Establishment

Activities	Potential Impact	Management and Mitigation Measures	Action Plan	
			Frequency	Responsible Parties
<ul style="list-style-type: none"> <li>- Access the drill site using a new access track where necessary</li> <li>- Set-up drilling machine with drip trays and groundsheets</li> <li>- Strip vegetation and topsoil (up to 300mm where available)</li> <li>- Temporarily store topsoil adjacent to drill site</li> <li>- Set-up mobile ablution facilities</li> <li>- Set-up fuel and lubricants storage area</li> <li>- Waste management</li> </ul>	Air quality – dust and gaseous emissions	<ul style="list-style-type: none"> <li>- The movement of drilling related vehicles on the unpaved access track will be on a small scale</li> <li>- Vehicle speeds will be limited to 30km/h on site (40km/h on access routes)</li> <li>- Vehicles and the drilling rig will be maintained in good working order</li> <li>- Minimise new access route development (routes to be approved by land owners prior to development)</li> </ul>	Duration of survey	Head of Exploration Site supervisor
	Noise	<ul style="list-style-type: none"> <li>- Vehicles will travel maximum 30 km/hour near houses/settlements</li> <li>- No operations are to be conducted at night</li> </ul>	Duration of survey	Head of Exploration Site supervisor
	Biodiversity	<ul style="list-style-type: none"> <li>- Refer to biodiversity management measures relating to ground surveying and sampling (Table 9-3)</li> <li>- Honour agreements set out in the site-access contracts, specifically relating to the areas utilised for tourism, hunting and livestock farming. Special consideration should be given to the sensitive hunting season.</li> <li>- All contractors should bring to site appropriate mobile toilet facilities for the exploration workers.</li> </ul>	Duration of survey	Head of Exploration Site supervisor
	Land use	<ul style="list-style-type: none"> <li>- Access agreements to be prepared and approved prior to drill site establishment.</li> <li>- The footprint of the area to be disturbed will be minimised as far as is practically possible.</li> <li>- Areas used as laydown areas are to be raked and/or ploughed to encourage re-vegetation.</li> <li>- Agree on relevant compensation with land-owners where land uses are impacted.</li> </ul>	Duration of survey	Head of Exploration Site supervisor
	Heritage	<ul style="list-style-type: none"> <li>- Refer to heritage management measures relating to ground surveying and sampling (Table 9-3)</li> </ul>	Duration of survey	Head of Exploration Site supervisor
	Socio-economic	<ul style="list-style-type: none"> <li>- Refer to socio-economic management measures relating to ground surveying (Table 9-3)</li> </ul>	Duration of survey	Head of Exploration Site supervisor

Activities	Potential Impact	Management and Mitigation Measures	Action Plan	
			Frequency	Responsible Parties
	Waste Management	<ul style="list-style-type: none"> <li>- Suitable receptacles (Wheelie Bins) for waste disposal should be available at all exploration sites. These receptacles will be clearly marked for different waste types.</li> <li>- Ensure all Receptacles have lid tops to prevent waste from being blown away</li> <li>- Waste shall be separated and recycled / re-used where possible.</li> <li>- No burning or burying of waste material will be allowed on site.</li> <li>- Employees and contractors will be shown the importance of correct waste disposal as well as waste minimisation and recycling.</li> <li>- Waste will be removed from site and disposed of at a suitable licensed waste disposal facility.</li> <li>- Hazardous waste (including hydrocarbon contaminated material/soil) will be disposed of at a licenced hazardous waste disposal facility.</li> <li>- Written evidence of safe disposal of waste will be kept.</li> <li>- Ensure daily inspection of waste bins and waste bin area to ensure waste is managed appropriately</li> </ul>	Duration of survey	Head of Exploration Site supervisor

Table 4-5: Environmental Management Measures- Drilling

Activities	Potential Impact	Management and Mitigation Measures	Action Plan	
			Frequency	Responsible Parties
<ul style="list-style-type: none"> <li>- Drill borehole</li> <li>- Contain all drilling water in the sump and allow to settle</li> <li>- Log the drill core and place on core trays</li> <li>- Maintain ablution facilities</li> </ul>	<b>Contamination of soil/Hydrocarbon spillages</b>	<ul style="list-style-type: none"> <li>- In all areas where there is storage of hazardous substances (i.e. hydrocarbons), there will be containment of spillages on impermeable floors and bunded trays that can contain 110% of the volume of the hazardous substances.</li> <li>- Regular inspection of hazardous storage area is required</li> <li>- Regular environmental awareness through Training should include potential risks associated with hydrocarbons.</li> <li>- Uraplant Mining (PTY) Ltd will establish environmental awareness in employees and contractors</li> <li>- All refuelling and any maintenance of vehicles will take place on impermeable surfaces.</li> <li>- Pollution will be prevented through basic infrastructure design and through maintenance of equipment.</li> <li>- Spill kits will be readily available on site. Employees and/or contractors will be shown to use the spill kits to enable containment and remediation of pollution incidents.</li> <li>- A PVC lined sump will be used for collection of oils and silt contained in the drilling water</li> <li>- Any spills will be contained and cleaned up immediately</li> <li>- Non-toxic and biodegradable drilling lubricant will be used</li> </ul>	On-going for all drilling activities	Head of Exploration Site supervisor
	<b>Groundwater and surface water contamination</b>	<ul style="list-style-type: none"> <li>- Refer to management measures relating to contamination of soils</li> <li>- Licenses in terms of the Water Resource Management Act (Act No. 11 of 2013) will be obtained shall the need to drill boreholes for water abstraction purposes arise.</li> <li>- Contractors should bring appropriate Mobile toilet facilities for the exploration site.</li> </ul>	On-going for all drilling activities	Head of Exploration Site supervisor

Activities	Potential Impact	Management and Mitigation Measures	Action Plan	
			Frequency	Responsible Parties
	Air quality deterioration	<ul style="list-style-type: none"> <li>- Vehicle speeds will be limited to 40km/h on access routes and 30Km/h on residential farm property or through settlements to limit dust.</li> <li>- The movement of drilling related vehicles on unpaved access track will be on a small scale.</li> <li>- Water sprays can be used around the lay-down area when a drill-site is located near settlements.</li> </ul>	On-going for all drilling activities	Head of Exploration Site supervisor
	Noise generation	<ul style="list-style-type: none"> <li>- Drilling will only be conducted during the day when drill sites are located close to inhabited homesteads.</li> <li>- Drilling plans and schedules will be discussed and agreed upon with land owners prior to initiation.</li> <li>- Vehicles will travel maximum 30 km/hour near houses/settlements.</li> </ul>	On-going for all drilling activities	Head of Exploration Site supervisor
	Land use	<ul style="list-style-type: none"> <li>- Refer to land use management measures relating to drill site establishment.</li> </ul>	On-going for all drilling activities	Head of Exploration Site supervisor
	Social – provision of toilet facilities	<ul style="list-style-type: none"> <li>- Provide appropriate mobile toilet facilities (Chemical) for the exploration workers on the site.</li> <li>- Ensure that sewerage- effluent tanks if required or installed at the exploration site are managed properly.</li> <li>- Ensure that mobile toilets are working properly and are cleaned at least weekly, so they do not pollute the surrounding environment or create hygiene problems.</li> <li>- The contractor should ensure regular servicing of mobile toilets</li> <li>- All sewerage from the chemical toilets and tanks will be pumped out by a contractor when required.</li> <li>- Personnel may not relieve themselves in the surrounding bush.</li> </ul>	On-going for all drilling activities	Head of Exploration Site supervisor

Activities	Potential Impact	Management and Mitigation Measures	Action Plan	
			Frequency	Responsible Parties
Water abstraction	Groundwater quantity	<ul style="list-style-type: none"> <li>- No abstraction of water is anticipated.</li> <li>- The farming water reservoir will be used as per terms of agreement with the farm owner to extract an amount of approximately 3 cubic meters per day.</li> <li>- Shall the need arise to draw more 3 cubic meter of water per day due to operational demand, the farm owner shall be informed and the current terms of agreement on the extraction of water from the farming reservoir shall be amended to include the additional required water quantity. The quantity of water required should not affect the day to day farming activities in the area.</li> <li>- Shall the need arise to drill boreholes for water abstraction purposes, water levels will be measured prior to abstraction, during abstraction (daily) and after completion. Levels will be reported to Farm owners. Water abstraction permit conditions will apply.</li> <li>- Should water be reached during drilling the farm owners will be informed? Should the Farm owners wish it; the holes will be cased and left for use by the community (liability relating to the boreholes will then be transferred to the Farm Owners).</li> </ul>	On-going for all drilling activities	Head of Exploration Site supervisor

Table 4-6: Environmental Management Measures- Social Issues and Training

Activities	Potential Impact	Management and Mitigation Measures	Action Plan	
			Frequency	Responsible Parties
Employees – social issues	<b>Violence, health and safety issues</b>	<ul style="list-style-type: none"> <li>- Have zero tolerance to alcohol in the workplace.</li> <li>- After taking leave, before returning to work employees should be in isolation for 7 days minimum. This is preventing spread of COVID-19.</li> <li>- Establish a HIV / AIDS / TB workplace policy and wellness programme.</li> <li>- Only People working for Uraplant Mining (PTY) Ltd or their contractors will be allowed to stay at the on-site accommodation.</li> <li>- First Aid Kits should be at all sites and drill camp to be used when needed.</li> <li>- Ambulance/ Emergency numbers should be written and placed at all exploration.</li> </ul>	Once- Closure of drill site	Head of Exploration Site supervisor and IEC
Training & Awareness		<ul style="list-style-type: none"> <li>- All individuals who work on, or visit, the sites are aware of the contents of the EMP.</li> </ul>	On-going	Head of Exploration Site supervisor

Table 4-7: Environmental Management Measures- Closure and Rehabilitation

Activities	Potential Impact	Management and Mitigation Measures	Action Plan	
			Frequency	Responsible Parties
<p>General closure activities:</p> <ul style="list-style-type: none"> <li>- Close drill holes (unless otherwise agreed with the Farm owner)</li> <li>- Remove water from the sump and drip trays</li> <li>- Remove oils and silt from drip trays and store until disposal to permitted hazardous landfill site</li> <li>- Backfill the sump once it has dried out (dome to allow for subsidence) and plug borehole (unless an agreement is in place with community for alternative uses)</li> </ul>	<p><b>Groundwater and surface water contamination</b></p>	<ul style="list-style-type: none"> <li>- In all areas where there is storage of hazardous substances (i.e. hydrocarbons), there will be containment of spillages on impermeable floors and bunded trays that can contain 110% of the volume of the hazardous substances.</li> <li>- All refuelling and any maintenance of vehicles will take place on impermeable surfaces.</li> <li>- Pollution will be prevented through basic infrastructure design and through maintenance of equipment.</li> <li>- Spill kits (drip trays) will be readily available on site. Employees and/or contractors will be shown how to use the spill kits to enable containment and remediation of pollution incidents.</li> <li>- Any spills will be contained and cleaned up immediately</li> </ul>	Once- Closure of drill site	Head of Exploration Site supervisor
	<p><b>Noise pollution</b></p>	<ul style="list-style-type: none"> <li>- Vehicles will travel maximum 30 km/hour near houses/settlements.</li> </ul>	On-going	Head of Exploration Site supervisor
	<p><b>Contamination of soils</b></p>	<ul style="list-style-type: none"> <li>- Refer to management measures relating to contamination of soil</li> </ul>	On-going and closure	Head of Exploration Site supervisor
	<p><b>Biodiversity</b></p>	<ul style="list-style-type: none"> <li>- Refer to rehabilitation requirements relating to biodiversity in Table 8-2.</li> </ul>	On-going and closure	Head of Exploration
	<p><b>Air quality deterioration</b></p>	<ul style="list-style-type: none"> <li>- Vehicle speeds will be limited to 60km/h on access routes to limit dust.</li> <li>- The movement of drilling related vehicles on unpaved access track will be on a small scale.</li> </ul>	On-going	Head of Exploration Site supervisor

Activities	Potential Impact	Management and Mitigation Measures	Action Plan	
			Frequency	Responsible Parties
<ul style="list-style-type: none"> <li>- Move drill core trays, ablation facilities, water bowser, stores and drill rig from the site</li> <li>- Dispose of any general waste to a permitted landfill site</li> <li>- Remove temporary fencing</li> <li>- Rip and plough compacted areas</li> <li>- Replace topsoil over disturbed area</li> <li>- Rehabilitate access track by ripping</li> <li>- GPS marker to identify drill site</li> </ul>	Soil erosion	<ul style="list-style-type: none"> <li>- Impacted footprints are to be raked and/or ploughed to encourage re-vegetation</li> <li>- Access routes will be ripped unless the land owners wish for them to remain.</li> <li>- A monitoring program will be implemented to establish re-vegetation progress</li> <li>- Agree on relevant compensation with land-owners where land used for hunting purposes is impacted</li> </ul>	Starts at closure, continues for a pre-determined time (as stated in agreements)	Head of Exploration Site supervisor
	Waste management	<ul style="list-style-type: none"> <li>- Decommission ablation facilities</li> <li>- Ensure that all waste generated during activities is removed from the site and disposed of appropriately</li> </ul>	Once off	Head of Exploration, IEC and Site supervisor
	Land use	<ul style="list-style-type: none"> <li>- Farm owners will be invited to carry out site inspections following rehabilitation in order to ensure that it has been carried out suitably.</li> </ul>	Post-closure	Head of Exploration Site supervisor and IEC

## **5 THE WAY FORWARD**

### **5.1 WAY FORWARD FOR THE SCOPING REPORT**

The way forward for the EIA scoping phase is as follows:

- Submit this report to MME as the Competent Authority who will then forward it to MEFT for a decision record.

## **6 CONCLUSION**

The environmental aspects associated with the proposed exploration activities on EPL (7800) have been successfully identified and assessed as part of this EIA Scoping process. Relevant mitigation measures have been provided and are included in the EMP that accompanies this scoping report. It must be taken into consideration that, constant engagement with the landowners prior to exploration activities is vital in the success of the proposed project.



MARVIN  
ENVIRONMENTAL PROJECT

CONSULTANTS CC

*Experts in Sustainable Development*

Contact Marvin Sanzila

+264 85 732 8952 / 0814788279

marvinconsultants@outlook.com

