ONGANJA MINING COMPANY (PTY) LTD

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P.O.Box 5059 WINDHOEK Republic of Namibia

25th March, 2022

BY HAND

ATTENTION: Mr Timoteus Mufeti

Environmental Commissioner

The Office of the Environmental Commissioner Ministry of Environment, Forestry and Tourism Private Bag 13306 WINDHOEK Namibia

Dear Sir

SUBMISSION OF APPLICATION FOR RENEWAL OF ENVIRONMENTAL CLEARANCE CERTIFICATE FOR MINING LICENCE 84A, B AND C

We respectfully submit herewith, our Application for Renewal of Environmental Clearance with respect to the above-mentioned Mining Licences.

This application comprises the following:

- Form 1 Renewal Application with attached N\$300 Revenue Stamps
- 2. Summary report
- Environmental Management Plan audit.
- 4. Copy of the original Environmental Clearance

We trust this application will be favourably reviewed.

Yours faithfully

Robert Carr General Manager MINISTRY OF ENVIRONMENT. FORESTRY AND TOURISM 2 8 MAR 2022 RECEIVED 2

Signature:.....

Directors: R. G. Carr* V.F.W. Petzel* I. I. Namaseb * (*Namibian)

ONGANJA MINING COMPANY (PTY) LTD

RENEWAL APPLICATION: ENVIRONMENTAL CLEARANCE CERTIFICATE

with respect to

MINING LICENCE 84A, B and C



25th March, 2022



FRONTISPIECE: View of part of the crushing circuit at Onganja Mine, during the rebuilding phase. The photo shows No.2 and No.3 conveyors with the vibrating screen under the central roof. The reconstruction of the entire crushing circuit has now been completed. Currently, the milling and flotation circuits, housed in the large building in the far background, are being refurbished. It is anticipated that the reconstruction phase will be completed by June, 2022 and that the mine will be in production during the second half of the year.

ANNEXURE 1 FORMS

Form 1

REPUBLIC OF NAMIBIA

ENVIRONMENTAL MANAGEMENT ACT, 2007

(Section 32)

APPLICATION FOR ENVIRONMENTAL CLEARANCE CERTIFICATE



PART A: DETAILS OF APPLICANT

- 1. Name: (person or business) ONGANJA MINING CO (PTY) LID
- 2. Business Registration / Identity No. (if applicable)
- 3. Correspondence Address: P.O. Box 5059, AUSSPANNPLATZ
- 4. Name of Contact Person: ROBERT CARR
- 5. Position of Contact Person: GENERAL MANAGER SPECTOR
- 6. Telephone No.: 061-234798
- 7. Fax No .: Cell No .: 0811491059
- 8. E-mail Address: (if any) onganjamining@iway.na

[☐] Tick (☐) the appropriate box

PART B: SCOPE OF THE ENVIRONMENTAL CLEARANCE CERTIFICATE

1. The environmental clearance certificate is for: EXPLORATION AND
MINING ACTIVITIES ON MINING LICENCE
□ *An, o, C
2. Details of the activity(s) covered by the environmental clearance certificate:
[Note: Please attach plans to show the location and scope of the designated activity(s), and use
additional sheets if necessary:
Title of Activity: EXPLORATION AND MINING
Nature of Activity: EXPLORATION AND MINING
Location of Activity: WINDHOEK-OKAHANDJA DISTRICTS
Scale and Scope of Activity: SMALL-SCALE OPERATIONS

PART C: DECLARATION BY APPLICANT

FOR A FULL REPORTING AND PHOTOGRAPHIC RECORD OF THE ABOVEMENTIONED ACTIVITIES, PLEASE REFER TO THE FULL SET OF BI-ANNUAL ENVIRONMENTAL DEPORTS SUBMITTED BY THE COMPANY

SUMMARY REPORT FOR THE ENVIRONMENTAL CLEARANCE RENEWAL APPLICATION FOR MINING LICENCES 84A, B, AND C

OVERVIEW

Onganja Mining Company (Pty) Ltd is a small local company conducting exploration and underground mining activities on the above-mentioned Mining Licences. During the reporting period, operations have focussed on exploration and the construction of the ore crushing and beneficiation plant. All activities have been fully reported on, with supporting photographs in each of the last six Biannual Environmental Reports submitted. The company is environmentally conscious, and strives to conduct all of its activities in compliance with environmentally correct practice.

2. BIANNUAL REPORTING

Since the last Environmental Clearance was issued to the company on 16th April, 2019 (a copy of which is attached), the company has submitted fully-supported Biannual Environmental Reports in terms of the requirements of the Act, by due date.

This application for the Renewal of the Environmental Clearance Certificate, is therefore also supported by these reports, which are illustrated with photographs relevant to its activities on the ground.

3. ENVIRONMENTAL MANAGEMENT PLAN AUDIT

Since the inception of the Environmental Management Plan the company has complied with its provisions to the best of its ability, and believes that it has done so, successfully. In support of this, an EMP Audit is herewith attached, and is drawn from the original EMP, with updated implementation status and comment provided. This forms a record of its environmental performance.

The EMP is a dynamic document, which comprises an on-going part of the company's activities on the Licences. The original EMP format is retained in the audit.

4. ON-GOING ACTIVITIES ON THE MINING LICENCES

As said, the work carried out on the Mining Licences includes surface exploration, underground prospecting shaft and mining development as well as the reconstruction of the ore crushing and beneficiation plant.

4.1 EXPLORATION ACTIVITIES

Exploration activities included geological mapping, electromagnetic and electrical ground resistivity geophysical surveys and hand-dug trenches to assist mapping exercises. Once such activities are fully completed, surface rehabilitation as required, is carried out. All activities are carried out by hand, and no earthmoving equipment is used. All activities carried out have been reported on and are illustrated with photographs in the Biannual Environmental Reports, as submitted to MEFT.

4.2 UNDERGROUND ACTIVITIES

Underground activities are conducted on a "small mine" scale, and in compliance with applicable legislation as per the Explosives Act, Mining Regulations, Labour Act and the Environmental Act. Again, such activities are reported on in the Biannual Environmental Reports submitted by the company. During the reporting period, very little underground work was carried out, as it had been largely completed up to the point of ore production. Once the orebody had been reached, the next step was to evaluate the nature and quality of the ore, and then decide on the final flowsheet for ore beneficiation and copper concentrate production. The work to implement this flowsheet then followed:

4.3 ORE PROCESSING PLANT RE-CONSTRUCTION

It was decided that the copper concentrate should be produced by using conventional crushing, milling and flotation circuits. To achieve this, part of the old and disused conveyor system in the crushing circuit could be reconstructed. The ore crushing system was replaced and two jaw crushers were installed with a vibrating screen incorporated into the circuit. A smaller ball mill was installed and twelve new flotation cells were built by an engineering works in Windhoek. These are to be installed shortly, once their steel support structures have been completed.

(A).

R.G. Carr General Manager 25th March, 2022

ENVIRONMENTAL MANAGEMENT PLAN SUMMARY AUDIT FOR EXPLORATION AND MINING ON MINING LICENCES 84A, B AND C FOR THE 3-YEAR PERIOD 1st JANUARY, 2019 - 31st DECEMBER, 2021

ASPECT	IMPACT	MANAGEMENT ACTIONS/OBJECTIVES	IMPLEMENTATION STATUS
Social and Environmental	Performance		
Management and Monitoring	Social and Environmental Performance	Adhere to all Namibian Legislation, including Best Practice Guidelines. Implementation of all aspects of the EMP during the exploration and mining phases	Implemented and on-going Implemented and on-going
Consultation and Disclosure	Social and Environmental Performance	 Maintain open and direct lines of communication with Interested and Affected Parties (I&APs) with regards to environmental matters. Consult with I&APs throughout the project process and adequately incorporate I&APs' concerns. 	This is current, especially with the landowner This is being done
Grievance Mechanism	Social and Environmental Performance	 Implement a grievance mechanism for receiving and resolving any concerns and grievances related to the project's social and environmental performance throughout the project life cycle. Inform all I&APs about the mechanism. Address concerns promptly and transparently and in a culturally appropriate manner. Keep a register of all concerns/issues received from I&APs, as well as the measures taken to address these. 	This mechanism is by direct contact with parties concerned Done This is also attended to This is in hand.
Training, including awareness and inductions	Social and Environmental Performance	Train employees and contractors in matters related to the project's social and environmental performance and Namibia's regulatory requirements. Ensure adequate environmental awareness training for all senior site personnel. Give environmental induction presentations to all site personnel prior to work commencement (note that rehabilitation issues need to be addressed, i.e. the need to avoid damage as far as possible and from the start.	This is attended to through discussion with and training of employees This is a subject of routine discussion with employees This is done, and forms part of on-going training of and engagement with employees.
Health, Safety and Securit	у		
Occupational Health and Safety	Social and Environmental Performance	 Prepare a Health and Safety Plan. Adhere to all Namibia's Health and Safety Regulations (Labour Act, 1992: Regulations) 	This is attended to

ASPECT	IMPACT	MANAGEMENT ACTIONS/OBJECTIVES	IMPLEMENTATION STATUS
		 Relating to the Health and Safety of Employees at Work). Hold five-minute safety talks in the morning; encourage all staff to identify and report any health or safety hazards. Occupational Health and Safety Training to be provided to all employees. Ensure that qualified first aid can be provided. Provide and ensure that active use of Personal Protective Equipment (PPE) (e.g. protective glasses and dust masks in dusty working conditions, overalls, gloves, safety shoes and hard hats). 	Employees are encouraged to have a healthy diet Safety in the workplace is routinely emphasised These matters are attended to This has been addressed PPE is issued to all employees, who are required to use such equipment appropriately
Exploration Activities	- 17	nd had a mind store of	20
Exploration Area / Driller Campsite	Disturbance of fauna and flora and habitat alteration	 No trees or natural vegetation may be removed for the making of fires. Do not introduce non-indigenous/alien invasive plant species. Keep the camp area clean and neat; store food in secure containers. No wild animal may be killed, injured, hunted, captured, disturbed, or fed. No unnecessary off-road driving will be allowed. No trespassing on adjoining properties is allowed and no livestock/game/vegetation is to be interfered with. 	This is adhered to This is adhered to This is complied with This is complied with This requirement is complied with
	Pollution of biophysical environment (air, soil and water)	 No fires will be allowed, unless specific areas have been identified and set aside for the cooking of food. Cooking appliances are to be properly maintained and ventilated. Pit latrines (or portable toilets; 1 toilet per 30 employees; preferred 1:15) to be provided and used at the work force dwellings or in the exploration area. Use bio-degradable detergents on site. Enforce proper waste (hazardous and non-hazardous) management practices 	This is complied with This is complied with Complied with Again, this is complied with

ASPECT	IMPACT	MANAGEMENT ACTIONS/OBJECTIVES	IMPLEMENTATION STATUS
	Occupational Health and Safety	 Ensure that employees are trained in the use of appropriate fire fighting equipment and ensure that such equipment is on hand at all times. Comply with all safety regulations re. electricity supply. Supply potable water for human consumption and other domestic uses. Make suitable arrangements, as far as practicable, for the maintenance of health, the prevention and overcoming of outbreaks of disease and of adequate first aid services. 	This is done, as applicable This is done Potable water is provided for domestic use Workers are encouraged to maintain high standards of personal hygiene
Presence of Exploration Crew and Activities	Disturbance of fauna and flora and habitat alteration	 A permit is required prior to the picking, cutting/chopping/picking off, taking, gathering, uprooting, damaging or destroying, or transporting any protected tree and/or plant. Keep the exploration areas clean and neat. No wild animal may be killed, injured, hunted, captured, disturbed, or fed. Avoid off-road driving. Implement and maintain track discipline with maximum speed limits (e.g. 30 km/h). No trespassing on adjoining properties is allowed and no livestock/game/vegetation is to be interfered with. 	Complied with when applicable This is company policy This is also company policy This is only done when required This is followed This is also company policy
	Pollution of biophysical environment (air, soil and water)	 Fuel tanks, gas cylinders and chemicals are to be properly stored and transported. Pit latrines to be provided and used at the workforce dwellings or in the exploration area. Ensure proper waste (hazardous and non-hazardous) management practices (as per Waste Management Plan). 	Complied with Complied with Also complied with
Exploration/Mining Activities (trenching, drilling, shaft sinking and U/G developmnt)	Loss of or damage to archaeological material	All staff (i.e. exploration personnel, contractors, subcontractors, company employees, etc.) to be made aware of the provisions of the National Heritage Act 27 of 2004 with regard to the protection of all archaeological sites and the need to report any new finds. • Careful examination of the area before any site preparation/trenching/drilling is undertaken.	This is complied with Again, this is complied with

ASPECT	IMPACT	MANAGEMENT ACTIONS/OBJECTIVES	IMPLEMENTATION STATUS
	Clearing of vegetation for exploration activities	 Do not clear any vegetation more than six months in advance of when it is required. Bulldozer blading and clear cutting to be avoided (excavators and backhoes do a neater job), also clearing with heavy machinery. Leave large trees standing where possible. Reduce the visual impact of vegetation clearance as far as possible. Use hand tools to cut lines; survey lines or walking tracks to not exceed 1m in width. Only use biodegradable and then also only small lengths of tape. Restrict exploration activities to previously demarcated areas where feasible; all other areas will be regarded as "no go" zones in order to minimize the impact on the surrounding land. 	This requirement is complied with This is also complied if such situation arises This is company policy This is also standard company policy Again, this is complied with Also complied with, where practically feasible
	Soil erosion	 Sediment mobilization and transport: reduce or prevent soil erosion (schedule activities to avoid heavy rainfall periods; contour and minimize length and steepness of slopes; mulching to stabilize exposed areas; re-vegetate areas promptly, and design channels and ditches for post-construction flow). Note that the area(s) towards and adjacent to the drainage line(s) are easily eroded and further development may exacerbate this problem. 	Attention is paid to this consideration
		 Road design: limit access road gradients to reduce run-off induced erosion; provide adequate road drainage based on road width, surface material, compaction and maintenance. 	This is done. Drainage berms are also constructed
		 Structural (slope) stability: provide effective short-term measures for slope stabilization, sediment and subsidence control until long-term measures can be implemented; adequate drainage systems to minimize and control infiltration. 	This is also attended to when required
		 Any excavated subsoil and rock also to be stockpiled for backfilling. 	This is standard procedure

ASPECT	IMPACT	MANAGEMENT ACTIONS/OBJECTIVES	IMPLEMENTATION STATUS	
Use of Explosives for Blasting	Occupational Health and Safety	and Safety of explosives is in accordance with the	The state of the s	Complied with
		Assign certified blasters / explosives experts to conduct the blasts.	Complied with	
		 Actively manage blasting activities in terms of loading, priming, and firing explosives, drilling 	Complied with	
		 near explosives, misfired shots and disposal. Implement specific warning devices (e.g. horn signals, flashing lights) and procedures before 	Complied with	
		Conduct specific personnel training on	Complied with	
		explosives handling and safety management. Implement blasting-permit procedures for all personnel involved in explosives (i.e. the handling, transport, storage, charging, blasting, and destruction of unused or surplus explosives). Following a blast, wait for the smoke and fumes to clear before returning to the blast area. Check (by qualified personnel) blasting sites post blast, and prior to resumption of work, for	Complied with, with inputs from African Explosives Limited, Namibia	
			Complied with	
			Complied with	
		 malfunctions and unexploded blasting agents If a misfire is found, restrict access to the blast area and only allow those personnel required to remove the hazard: i) do not extract explosives 		
		from a charged/misfired hole; if this presents a hazard, remove the explosives by washing them out with water (if the misfire is under water, blow them out with air); ii) if there are misfires while using cap and fuse, keep all personnel clear of the blast area for at least one hour; do not permit drilling/digging until all misfired holes have been detonated.	Complied with	
		Implement specific audited procedures, in accordance to the Regulations of the Explosives Act 26 of 1956, for all activities related to explosives (handling, transport, storage, charging, blasting, and destruction of unused or surplus explosives).	Complied with, with inputs from African Explosives Limited, Namibia, and members of the NamPol Explosives Division, when required.	

ASPECT	IMPACT	MANAGEMENT ACTIONS/OBJECTIVES	IMPLEMENTATION STATUS
Drill rig, vehicles, generators	Pollution of biophysical environment	 Use biodegradable and non-toxic drill fluids/additives. All diesel generators on site to be placed on a tarpaulin sail. Oil traps to be installed in appropriate places to collect potential toxic materials. Immediately report and clean up any accidental hydrocarbon spill. 	This is complied with Complied with when warranted Complied with when warranted Also a requirement that is complied with
Change in Land Use	Name and the same		
Camp- and Exploration Sites	Change in land use (agricultural to industrial/explora- tion/mining)	 Restrict exploration activities to demarcated areas; all other areas will be regarded as "no go" zones in order to minimize the impact on the surrounding land. 	Activities are restricted to the areas within the Mining Licences
Resource Use		and the state of t	
Water Management	Resource use / depletion of natural resources	 Ensure prudent use of water in all activities. Re-circulate non-potable water whenever possible, when relevant. Water storage tanks to be insect and animal-proof and to be covered to reduce evaporation. 	This is standard procedure This would be done where feasible This is done
Hazardous Materials Man	agement		
Hazardous materials management	Social and Environmental Performance Occupational Health	Establish hazardous materials management priorities. Avoid, or minimize the use of hazardous materials. Prevent uncontrolled releases of hazardous materials to the environment or uncontrolled reactions that may result in fire or explosion. Make sure of engineering controls; implement management controls to address residual risks not prevented or controlled through engineering controls. Implement hazard communication and training	These are in place and monitored This is complied with This is an important aspect of operation that is complied with These two aspects are catered for This is done
	and Safety	programmes. Provide and ensure the active use of PPE.	This is done This is a company requirement
Waste Management			1
Waste management: non- hazardous and hazardous	Pollution of biophysical environment	 Prepare and submit a Waste Management Plan before exploration commences. Where waste cannot be recovered/re-used, it should be treated, destroyed and disposed of in an environmentally sound manner. 	This has been done and is in place This is complied with

ASPECT	IMPACT	MANAGEMENT ACTIONS/OBJECTIVES	IMPLEMENTATION STATUS
		Institute and maintain good housekeeping and operating practices, littering is not allowed. Non-hazardous and hazardous waste to be collected and stored separately. Non-hazardous waste: refuse (that will not be recycled/reused/incinerated) to be stored in covered refuse bins, collected on a regular basis and disposed of at the Kupferberg landfill. Hazardous waste: recycle petroleum (fuels and lubricants) waste products and collect and recycle batteries. The remainder to be transported to a recognised hazardous waste disposal site (e.g. Windhoek).	Company policy is to strictly prevent any form of littering, by providing proper litter receptacles. Good housekeeping practices are part of strict company policy. This is complied with This is also complied with Waste oils are delivered to the City of Windhoek oil disposal facility at its premises in Pullman Street, Windhoek
Waste management, sanitary	Pollution of biophysical environment	 Pit latrines to be provided and used at the workforce dwellings and workplace 	This is done
Rehabilitation & Decomm	issioning		
Rehabilitation	Social and Environmental Performance	 Rehabilitation (of trenches and drill sites) to take place on a continuous basis. Disturbed areas to be backfilled with rocks and subsoil, and then the topsoil/vegetation layers. Drill cuttings to be disposed of in suitable nearby trenches or ground hollows. Manually rip (using picks or rakes) disturbed areas where compaction has taken place; avoid creating parallel furrows (this will promote erosion). Reshape all disturbed areas (including temporary detours and turnouts) to their original contours. 	This is complied with This is also complied with when drilling takes place This is attended to if such situations arise This is carried out where feasible, to the best of our ability





MINISTRY OF ENVIRONMENT AND TOURISM

Tel: (00 26461) 284 2111 Fax: (00 26461) 232 057

Enquiries: Mr. Josafat K Hiwana E-mail: josafat.hiwana@met.gov.na Cnr Robert Mugabe & Dr Kenneth Kaunda Street Private Bag 13306 Windhoek Namibia

16 April 2019

OFFICE OF THE ENVIRONMENTAL COMMISSIONER

The Managing Director Onganja Mining Company (Pty) Ltd P.O. Box 5059 Ausspannplatz Windhoek Namibia

Dear Sir/Madam

SUBJECT: ENVIRONMENTAL CLEARANCE CERTIFICATE FOR THE EXPLORATION AND UNDERGROUND MINING IN MINING LICENSE (ML) 84 A-C, IN OTJOZONDJUPA AND KHOMAS REGIONS RESPECTIVELY

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. All relevant permitting authority must be properly consulted and written consent obtained from them.

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 Onganja Mining Company (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,

Fredrick Mupati Sikabongo

DEPUTY ENVIRONMENTAL COMMISSIONER

PIBSU

"Stop the poaching of our rhinos"

All official correspondence must be addressed to the Permanent Secretary